Permits Committee
Report to BACWA Board

Committee meeting on 2/11/2025
Executive Board Meeting Date: 3/21/2025
Committee Chair: Meg Herston, Fairfield-Suisun Sewer District

Committee Request for Board Action: None

42 attendees participated remotely, including representatives from 18 member agencies, the CWEA Lab Committee, and one guest speaker.

Analyzing Chronic Toxicity Results using the Test of Significant Toxicity

Alex Anderson, Technical Manager and Head of R&D at McCampbell Analytical, led a training session on the Test of Significant Toxicity (TST). Since the State Water Board's Toxicity Provisions went into effect in 2023, the TST has been the required statistical method for interpreting whole effluent toxicity results to comply with NPDES permits. Presentation highlights included:

- An explanation of how the TST mathematically compares whole effluent toxicity test results from two different concentrations, usually a control and the Instream Waste Concentration, to determine whether they are statistically different by an unacceptable threshold determined by the regulatory agency (in this case the Water Boards).
- Details about how the TST incentivizes data quality, because higher-quality data reduces the probability of a non-toxic sample being mistakenly declared as toxic. This can be accomplished by adding replicates (which increases cost) or by reducing test variance through the use of better laboratory quality control procedures, such as feeding protocols.
- The presentation also covered how to read laboratory reports (typically produced by the software program CETIS), how to use the TST Spreadsheet Tool provided by the State Water Board, and how to interpret the results of species sensitivity screening studies.

For more information, see the presentation slides.

Upcoming NPDES Permits

The group discussed the reasonable potential analysis for dissolved oxygen in the FSSD Tentative Order NPDES Permit.

Climate Change Update

Volunteers were recruited to help test drive a planned update of the Regional Water Board's 2021 Climate Change Information Request. Regional Water Board staff have found that the information from the survey is useful for NPDES permitting and related Water Board programs.

Oher Announcements

- EPA's proposed Methods Update Rule 22 (Dec. 2024) would remove PCB Aroclor methods (608.3, 625.1) from the list of approved Clean Water Act methods. Regional Water staff have confirmed that PCB compliance monitoring using Aroclors will **not** change until the permit is reissued (c. early 2028), even if the rule is finalized.
- EPA is currently soliciting comments on the Draft Human Health Water Quality Criteria for PFOS, PFOA, and PFBS and the Draft Biosolids Risk Assessment for PFOS and PFOA.
- For the Nutrient Watershed Permit, responses to BACWA's Request for Information on nutrient removal planning for the Group Annual Report are due February 19th.
- The BACWA Recycled Water Committee and Northern California WateReuse chapter are planning to host a workshop on the recycled water / nutrient removal nexus in spring 2025.

Next Meeting: Tuesday, April 8th, Virtual
BACWA Annual Members Meeting: Friday, May 2nd