



The June 13, 2013 meeting will be held at:

Carollo Engineers
2880 Gateway Oaks Drive, Suite 300
Sacramento, CA 95833
<http://www.carollo.com>

(916) 565-4888

9:30 a.m. – 1:00 p.m.

Upcoming Meetings:

- Tri-TAC Meeting July 11, 2013 – 9:30 – 12:00 – **Conference Call**
- Tri-TAC Special Webinar: Biological Objectives - July 15, 2013 at 10:00 a.m.
(see flyer)

Carollo Engineers Sacramento Office
2880 Gateway Oaks Drive, Suite 300
Sacramento, CA 95833

From EAST BAY

Take I-80 East towards Sacramento

Right after the City of Davis be sure to stay on **I-80 towards Reno (DO NOT TAKE I-80 TOWARDS SOUTH LAKE TAHOE)**

Take the West El Camino Exit – make a right.

Turn left at Gateway Oaks Drive.

Follow Gateway Oaks Drive until you reach 2880 Gateway Oaks Drive on your right hand side. We are in Suite 300.

From the AIRPORT

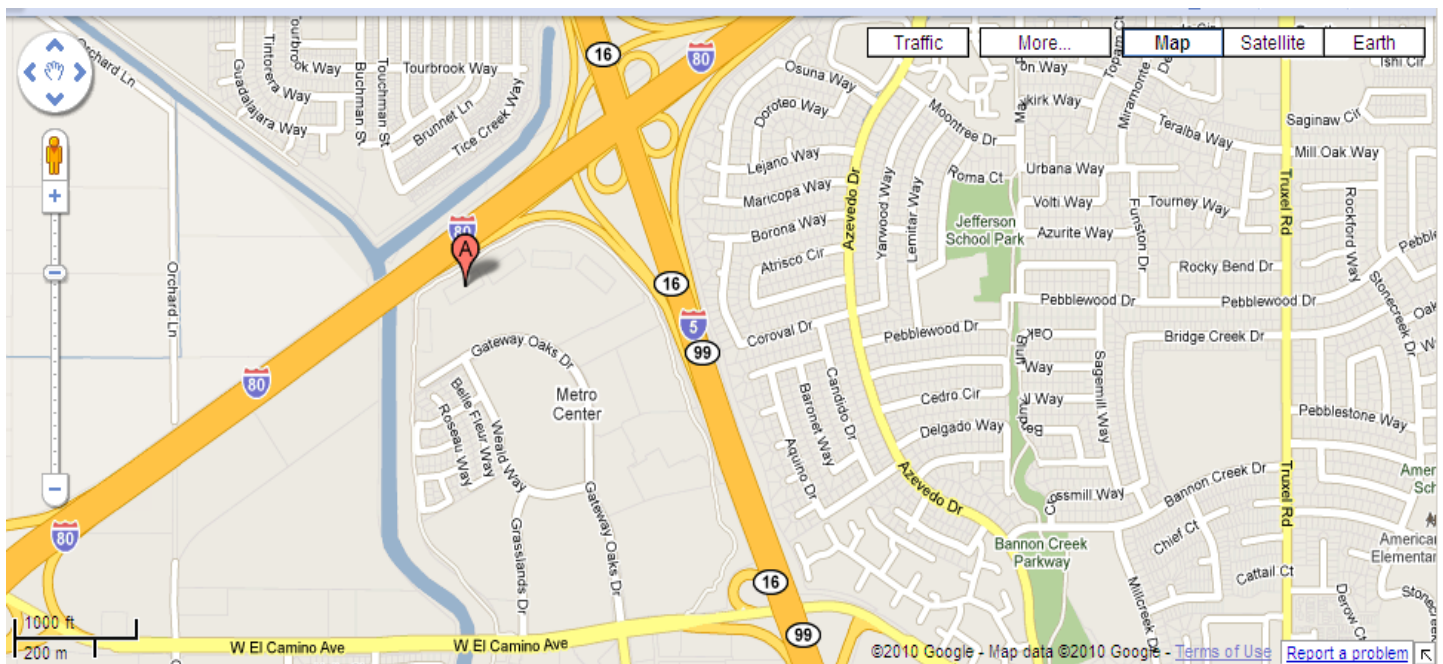
Take I-5 South towards Los Angeles

Exit right to I-80 West (towards San Francisco)

Take the West El Camino Exit, and turn left on West El Camino.

Turn left on Gateway Oaks Drive.

Follow Gateway Oaks Drive until you reach 2880 Gateway Oaks Drive on your right hand side. We are in Suite 300.





TRI-TAC MEETING

Carollo Engineers
2880 Gateway Oaks Drive, Suite 300
Sacramento, CA 95833
(916) 565-4888

THURSDAY, June 13, 2013

9:30 A.M. – 1:00 P.M.

9:30 A.M. – 10:00 A.M. – GENERAL MEETING

1. Introductions
2. Future Meeting Schedule and Locations, Committee Assignments and Sign-In Roster
3. Debrief from Summit Partners Meeting
4. WEF Layperson's Guide to Wastewater
5. Key Legislation of Interest and Status (State - AB 371, SB 727, AB 803, Federal –SA 1100, SA 1103)
6. Update on Volumetric Wastewater Pricing Stakeholder Group
7. Cross-Media Issues Update
 - a. Triclosan Comment Letter (Page 7)
 - b. Pyrethroid Study
 - c. Other Pesticide Steering Committee Updates
8. Update on Hot Topic Issues In Water and Land Committees
9. Brief Updates from Other Organizations (CWEA, WEF, Regional Associations, etc.)
10. Tri-TAC Special Webinar on Biological Objectives - July 15 10:00 A.M. (Page 12)

10:00 A.M. – 12:00 P.M. – WATER & LAND COMMITTEE MEETINGS

1. Water Committee Agenda & Attachments (Page 13-19)
2. Land Committee Agenda & Attachments (Page 20)
3. Committee Issue Summaries (Page 21 & 27)

12:00 P.M. – 1:00 P.M. – SPECIAL PRESENTATION

1. Bob Seyfried – Senior Civil Engineer, SRCSD
Status of Efforts to Contest NPDES Permit Requirements for
Nutrient Removal and Tertiary Filtration

TRI-TAC SPONSOR REPRESENTATION 2013
(June 2013)

League of California Cities (LOCC)	CASA	CWEA	
Jason Rhine	Sharon Green Ben Horenstein Roberta Larson Terrie Mitchell, Tri-TAC Chair	James Clark Jim Colston Bob Gillette Tom Grovhoug Jon Hay	Chandra Johannesson Jackie Kepke, Tri-TAC Vice Chair Hugh Logan Alec Mackie Monica Oakley

Tri-TAC Liaison Representation

BACWA: Dave Williams
CASA: Roberta Larson, Greg Kester
SCAP: John Pastore

CVCWA: Debbie Webster
CWEA: Phil Scott, Alec Mackie
LOCC: Jason Rhine

COMMITTEES

AIR	LAND	WATER	
Chair: Air Committee On Ad-hoc Basis only	Co-Chairs: Vince De Lange Tom Meregillano	Co-Chairs: Shannon Bishop & Jason Lofton Finance Subcommittee Chair: Dave Bruns	
Interested Participants	Interested Participants	Interested Participants	
Terry Ahn Frank Caponi Stephanie Cheng James H. Clark Sarah Desalauriers Zeynep Erdal Kris Flaig Sharon Green Patrick Griffith Bobbi Gustafson Ron Hipkiss Kirk Howard Greg Kester Vlad Kogan John Pastore Amanda Roa Lisa Rothbart Jim Sandoval Randy Schmidt Jennifer Shepardson Kevin Steet Debbie Webster	Matt Bao Layne Baroldi Stephanie Cheng James Clark Melissa Fischer Bonnie Jones Diane Gilbert Jones Robert Gillette Eric Have Jon Hay Ron Hipkiss Al Javier Bonnie Jones Zachary Kay Greg Kester Matt Krup Derrick Lee Ajay Malik Mike Moore Octavio Navarrette Michelle Pla Tim Potter John Pugliarese Lisa Rothbart Kelly Sarber Mike Sullivan Caroline Quinn Sandy Warren Debbie Webster	Matt Bequette Rebecca Bjork Phil Bobel Barbara Buikema Amy Chastain Stephanie Cheng James Clark Paul Cobian Jim Colston Mike Connor Vicky Conway Linda Dorn Andy Eggleston Lorien Fono Rebecca Franklin Levi Fuller Dan Gallagher Preeti Ghuman Nicole Granquist Donald Gray (Gabb) Sharon Green Tom Grovhoug Bobbi Gustafson Tom Hall LeAnne Hamilton Lisa Haney Beverley Hann Ben Horenstein Al Javier Chandra Johannesson Jim Kelly	Jackie Kepke, Tri-TAC Vice Chair Roberta Larson Melody LaBella Phil Markle Patricia McGovern Tom Meregillano Terrie Mitchell, Tri-TAC Chair Kelly Moran Andy Morrison Mitchell Mysliwicz Karen North Monica Oakley Laura Pagano John Pastore Michelle Pla Tim Potter Paul Prange Daniel Rynn Amanda Roa Lisa Rothbart Phil Scott Jennifer Shepardson Christopher Stacklin Martin St. George Curt Swanson Bonnie Teaford Melissa Thorne David Tucker Lysa Voight Debbie Webster

TRI-TAC LOCATIONS & 2013 SCHEDULE
(EFFECTIVE JUNE 4TH, 2013)

TRI-TAC MEETING DATE¹	LOCATION/HOTEL	COMMENTS
JANUARY 10, 2013	Conference Call	CASA – January 16 - 18 Indian Wells, CA
FEBRUARY 14, 2013	Boy Scout Council 1001 Davis Street San Leandro, CA 94577	CASA D.C. Conference February 25 – 27
MARCH 14, 2013	Carollo Engineers 2880 Gateway Oaks Drive, Suite 300 Sacramento, CA 95833	
APRIL 11, 2013	Conference Call	CWEA – April 16-19 Palm Springs, CA CASA – April 24-26 Newport Beach, CA
MAY 9, 2013	Orange County Sanitation District 108 44 Ellis Avenue Fountain Valley, CA 92708	Shuttle bus offered from John Wayne Airport at about 8:40am.
JUNE 13, 2013	Carollo Engineers 2880 Gateway Oaks Drive, Suite 300 Sacramento, CA 95833	
JULY 11, 2013	Conference Call	
AUGUST 8, 2013	No Meeting	CASA – August 21-24 San Diego, CA
SEPTEMBER 12, 2013	Boy Scout Council 1001 Davis Street San Leandro, CA 94577	
OCTOBER 10, 2013	Orange County Sanitation District 108 44 Ellis Avenue Fountain Valley, CA 92708	Shuttle bus offered from John Wayne Airport at about 8:40am. WEFTEC Oct. 5 – 9 Chicago, IL
NOVEMBER 14, 2013	Conference Call	
DECEMBER 12, 2013	Sacramento Facility TBD	Tri-TAC Retreat December 12-13 at EBMUD Lake Pardee Facilities
¹ If you would like to add an agenda item or schedule a presentation for an upcoming meeting, please contact one of the committee co-chairs at least 14 days before the designated meeting date ² If you would like an “after Tri-TAC” meeting noted in the agenda package, please contact Terrie Mitchell at least ten days before the designated meeting date. ★ Air Committee is meeting on an Ad-Hoc Basis.		

Tri-TAC Meeting Attendance-May 9th
Orange County Sanitation District

Matt Bao, LACSD
Layne Baroldi, Synagro
Shannon Bishop, LACSD
Dindo Carrillo, OCSD
Paul Cobian, City of LA
Rebecca Franklin, City of San Bernardino
Melissa Fischer, LACSD
Preeti Ghuman, LACSD
Diane Gilbert Jones, City of LA
Sharon Green, LACSD
Patrick Griffith, LACSD
Bobby Gustafson, San Bernardino Water
Eric Have, Encina Wastewater Authority
Jon Hay, Black Veatch
Al Javier, Eastern Municipal Water District
Jacqueline Kepke, East Bay Municipal Utility District
Adam Link, CASA
Alec Mackie, JWC Environmental
Phil Markle, LACSD
Tom Meregillano, OCSD
Mitchell Mysliwicz, Larry Walker Associates
John Pastore, SCAP
Hassan Rad, City of LA
Lisa Rothbart, OCSD
Jennifer Shepardson, City of San Bernardino Water
Christopher Stacklin, OCSD
Seth Carr, City of LA



Terrie L. Mitchell
Tri-TAC Chair
Sacramento Regional County Sanitation District
10060 Goethe Road
Sacramento, CA 95827
(916) 876-6092
mitchellt@sacsewer.com

Via Electronic Mail

May 28, 2013

Sandra O'Neill
Office of Pesticide Programs (OPP)
Regulatory Public Docket (7502P)
U.S. Environmental Protection Agency (U.S. EPA)
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Re: Triclosan Registration Review Preliminary Work Plan Case # 2340 (Docket ID Number EPA-HQ-OPP-2012-0811)

Dear Ms. O'Neill:

Tri-TAC appreciates the opportunity to provide comments on the Registration Review Preliminary Work Plan (work plan) for Triclosan. As background, Tri-TAC is a technical advisory group for publicly owned treatment works (POTWs) in California. It is jointly sponsored by the California Association of Sanitation Agencies, the California Water Environment Association, and the League of California Cities. The constituency base for Tri-TAC collects, treats, discharges or reclaims wastewater and manages biosolids for most of the sewered population of California.

Tri-TAC is interested in the Triclosan Registration Review process because Triclosan is an aquatic toxicant and its uses have expanded rapidly. For example, linens, clothing, blankets, pillows, carpets, food service containers, food trays, tiles, toilets, toothbrushes, adhesives, and mops, to name just some listed in the work plan, will all likely be washed at some time during their useful life. Upon washing, these products may release Triclosan into wash water, which will then go down an indoor drain and enter wastewater collection systems and treatment facilities. Once there, Triclosan is relatively stable and may either pass through the treatment facility to surface water or partition to biosolids.

Tri-TAC members treat millions of gallons of wastewater that is then discharged to fresh or salt water bodies, including local creeks and rivers, bays, and the Pacific Ocean. These waterways provide crucial habitat to a wide array of aquatic species and waterfowl. It is therefore essential that the Triclosan registration and review processes adequately consider potential

impacts to wastewater quality, so that such impacts to the beneficial uses of the receiving water are *prevented*.

If the registration review process fails to prevent toxic releases of pesticides to the aquatic environment, an undue burden to address the problem is placed on local governments. Acute or chronic toxicity is one of the most common adverse impacts of pesticides in effluents and surface waters. Under the Clean Water Act, wastewater facilities are often required to conduct and pay for accelerated tests weekly for a minimum of six weeks if toxicity is observed. Should toxicity be observed in two or more of these weekly accelerated tests, the discharger is required to implement a toxicity identification evaluation (TIE), to identify what is causing toxicity, the cost of which can vary widely from \$10,000 to well over \$100,000 depending on complexity and persistence of the toxicant.

Once identified, the cost to treat or remove the toxicity causing compound(s) can vary dramatically. Often, there are few ways for a discharger to mitigate the problem other than extremely costly treatment plant upgrades. The California State Water Board is currently considering a regulatory proposal that would move toxicity from a narrative standard to a numeric standard. Exceedances would not only trigger the expensive test described above, but would also be subject to both fines and citizen lawsuits.

In addition, when surface water bodies become impaired by pesticides, wastewater facilities may be subject to additional requirements established as part of Total Maximum Daily Loads (TMDLs) set for the water bodies by U.S. EPA and state water quality regulatory agencies. While there are no current impairments identified due to Triclosan, future impairment designations are possible based on the growing body of evidence regarding its impacts in aquatic ecosystems. A number of pesticide-related TMDLs have been adopted or are in preparation in California. The cost to wastewater facilities and other dischargers to comply with TMDLs can be up to millions of dollars per water body per pollutant. This process will continue as long as pesticides are approved for uses that result in water quality impacts; it is therefore imperative that EPA exercise its regulatory authority to fully assess the potential for Triclosan to impact water quality and for EPA to take action to ensure that any impacts are prevented or fully mitigated.

As such, Tri-TAC recommends the following to allow for a more complete approach to risk assessments that may result in discharges to wastewater treatment facilities:

- Need Comprehensive Federal Review of All Triclosan Uses-the list of covered uses in this registration review is extensive, however, there are many other uses of Triclosan not covered by this registration review that are of equal concern to Tri-TAC. Any use of Triclosan that may be washed down indoor drains poses a threat to our members' compliance with stringent regulatory requirements under the Clean Water Act. We believe that the registration review should include a cumulative environmental risk assessment that incorporates all uses of Triclosan, including those regulated under the Federal Food, Drug and Cosmetic Act (FFDCA) by the Food and Drug Administration (FDA).

- Require All Necessary Aquatic Toxicity Studies in Work Plan- Tri-TAC is concerned that this work plan indicates a lack of understanding of how different listed uses of Triclosan may reach the environment, and therefore which ecological studies are needed. To address the data gaps in the work plan, we request that all the following studies be performed for *both* Triclosan and methyl Triclosan either through data requirements or by acceptable open literature: acute and chronic freshwater fish, acute and chronic estuarine/marine fish, acute and chronic freshwater crustacean, acute and chronic estuarine/marine crustacean, acute and chronic freshwater mollusk, acute and chronic estuarine/marine mollusk, acute and chronic freshwater benthic invertebrate, and acute and chronic estuarine/marine benthic invertebrate.
- Improved Conceptual Model Needs Further Refinement- Tri-TAC appreciates that EPA has incorporated a more nuanced conceptual model of environmental releases, particularly the inclusion of potential impacts to wastewater treatment organisms. To further refine this model, we ask that EPA include all uses other than textiles that have the potential to release Triclosan to wastewater facilities and the environment.
- Municipal Wastewater Modeling Necessary- to accurately inform an environmental risk assessment for Triclosan, the EPA should conduct Down-the-Drain modeling that is typical for discharges to municipal wastewater treatment facilities.
- Evaluate Potential Impacts to Wastewater Treatment Organisms- as depicted in the work plan's environmental release conceptual model, microorganisms that treat wastewater may be impacted by Triclosan in wastewater. These microorganisms do the basic work of removing fecal matter and dissolved organics in sewage; if a pesticide enters a treatment plant in sufficient quantities, it is possible it could harm these crucial microorganisms. To support the analysis of municipal wastewater treatment plan process interference, EPA must have sufficient data to evaluate how wastewater treatment organisms may be affected by Triclosan. We request that EPA require a sludge respiration inhibition test (EPA OPPTS Guideline 850.6800)
- Evaluate Impacts to Biosolids- because some portion of the Triclosan released to wastewater treatment facilities is likely to partition to the solid phase, Tri-TAC is concerned about Triclosan's impact on agencies' management options for biosolids. Indeed, several studies have shown uptake and bioaccumulation of Triclosan by certain terrestrial plants grown in biosolids-treated soil. We therefore agree with the Australian government's risk assessment for Triclosan that releases of Triclosan to biosolids need further evaluation, and we urge EPA to require field studies that identify the impacts, if any, to biosolids management options including land application, incineration and surface disposal. Such studies are important to accurately quantify fate, exposure, and risk from the use of pesticides that will likely partition into biosolids if discharged to wastewater treatment facilities.

Additionally, the Bay Area Clean Water Agencies (BACWA) has submitted comments further detailing these provided by Tri-TAC, which we support and incorporate by reference.

Thank you very much for the opportunity to provide our comments. If you have any questions, please contact Melody LaBella, at (925) 229-7370 or mlabella@centralsan.org.

Very truly yours,



Terrie Mitchell
Tri-TAC Chair

cc: Steve Bradbury, Director, U.S. EPA Office of Pesticide Programs
Susan Lewis, Acting Director, U.S. EPA U.S. EPA Office of Pesticide Programs,
Antimicrobials Division
James Breithaupt, U.S. EPA U.S. EPA Office of Pesticide Programs, U.S. EPA Office of
Pesticide Programs, Risk Assessment and Science Support Branch
Lance Wormell, U.S. EPA Office of Pesticide Programs, Regulatory Management Branch II
Sandra O'Neill, U.S. EPA Office of Pesticide Programs, Regulatory Management Branch II
Philip Ross, U.S. EPA Office of General Counsel
Andrea Medici, U.S. EPA Office of General Counsel
Srinivas Gowda, U.S. EPA Office of Pesticide Programs, Risk Assessment and Science
Support Branch
Pat Jennings, U.S. EPA Office of Pesticide Programs, Risk Assessment and Science Support
Branch
William Erickson, U.S. EPA Office of Pesticide Programs, Risk Assessment and Science
Support Branch
Najm Shamim, U.S. EPA Office of Pesticide Programs, Risk Assessment and Science
Support Branch
Donna Randall, U.S. EPA Office of Pesticide Programs, Risk Assessment and Science
Support Branch
Steven Weiss, U.S. EPA Office of Pesticide Programs, Risk Assessment and Science Support
Branch
Rick P. Keigwin, Jr., U.S. EPA Office of Pesticide Programs, Pesticide Re-Evaluation
Division
Betsy Southerland, Director, U.S. EPA Office of Water, Office of Science and Technology
Randy Hill, Acting Director, U.S. EPA Office of Water, Office of Wastewater Management
David Smith, Acting Director, Water Division, U.S. EPA Region 9
Debra Denton, Water Division, U.S. EPA Region 9
Patti TenBrook, Life Scientist, U.S. EPA Region 9
Richard Breuer, California State Water Resources Control Board
Tom Mumley, California Regional Water Quality Control Board, San Francisco Bay Region
Janet O'Hara, California Regional Water Quality Control Board, San Francisco Bay Region

Ms. O'Neill

Triclosan Registration Review Case #2340 (Docket ID Number EPA-HQ-OPP-2012-0811)

May 28, 2013

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Nan Singhasemanon, California Department of Pesticide Regulation

Kelly D. Moran, Urban Pesticides Pollution Prevention Project

Jennifer Jackson, Jackson Environmental

Greg Kester, California Association of Sanitation Agencies

Chris Hornback, Senior Director, Regulatory Affairs, National Association of Clean Water Agencies

Tri-TAC Special Session & Webinar

Biological Objectives in California Causal Assessment Evaluation and Guidance

July 15, 2013 from 10am-12pm
Location: Southern CA Coastal Water Research Project



Presented by: Ken Schiff, Southern California Coastal Water Research Project

- The State Water Board is currently developing biological objectives for perennial and wadeable streams. The goal of this effort is to set biological expectations that ensure the protection of aquatic life.
- If a stream does not meet the biological expectations, regulated and regulatory agencies must work together to identify the cause of the impact so it can be remediated.
- In most instances, this cause identification process will require conducting a causal assessment.

This presentation/webinar will provide stakeholders with an introduction on available draft guidance for conducting a causal assessment for streams not meeting biological expectations in California. A draft copy of the Assessment and Guidance Document can be downloaded at:

http://www.waterboards.ca.gov/plans_policies/docs/biological_objective/3_causalassessment.pdf

SCCWRP Conference Room
3535 Harbor Blvd., Suite 110
Costa Mesa, CA 92626

(<http://www.sccwrp.org/ContactUs/Directions.aspx>)

Please RSVP to Molly Ranes at mranes@casaweb.org by July 10
and identify if you will be attending in person or via webinar

Tri-TAC Water Committee Agenda – April 11, 2013

ITEM #	Topic	LEAD	Time (min)	Relevant material
Discussion Items:				
1.	State Water Board Resource Alignment	Adam Link	10	http://www.waterboards.ca.gov/water_issues/programs/rap/Attachment
2.	Enforcement Policy- SSO Penalties	Melissa Thorne	20	http://www.swrcb.ca.gov/water_issues/programs/enforcement/docs/enf_policy_final111709.pdf
3.	Biological Objectives	Phil Markle	20	http://www.waterboards.ca.gov/plans_policies/docs/biological_objective/ca_usl_asmt_wkpln.pdf
4.	State Water Board Update on Mercury Projects	Debbie Webster/ Shannon Bishop	10	http://www.swrcb.ca.gov/water_issues/programs/mercury/
Updates				
1.	SSS WDR MRP	Adam Link/ Monica Oakley	10	
2.	State Water Board Cadmium & Hardness Policy	Mitchell Mysliwec	10	
3.	Statewide Nutrient Strategy	Tom Grovhoug Mitchell Mysliwec	15	
4.	North Coast Region Board Update on Water Quality Objectives	Shannon Bishop	10	http://www.waterboards.ca.gov/north_coast/water_issues/programs/basin_plan/130221_wqo/130221_wqo_amendment.pdf
Items that are out there:				
Triclosan Comment Letter to EPA	Melody LaBella	http://www.tritac.org/documents/letters/TRI-TAC-Triclosan-Registration-Review-Letter.pdf		

Water Board Staff Evaluation of NPDES Stakeholder Cost of Compliance Proposals

I. Establish Processes for Streamlining Monitoring Requirements in NPDES Permits

Proposal 1	State Water Board develop, in conjunction with stakeholders, a process to review existing compliance monitoring programs to identify opportunities to streamline routine monitoring requirements.
<p>WB staff comments/concerns: More detail on the proposal would be helpful to our review. For example, is the idea to review permit requirements for all existing permits at one time (as a short term project) or to review permits on an individual basis when they come up for renewal (ongoing process). In many cases, the Regional Boards already work with affected entities to refine permit conditions and remove unneeded monitoring requirements. A formal process, including guidelines, for evaluating monitoring requirements could bring additional consistency to NPDES program implementation, but monitoring requirements are often site-specific and facility-specific, and therefore attempting to standardize requirements may not be useful. In some cases there is limited flexibility to change monitoring requirements and/or frequency due to the provisions of the State Implementation Policy or other regulatory requirements.</p> <p>In general we agree that there could be value in developing general informal guidance for how staff should conduct permit by permit evaluations of monitoring requirements. Implementing this proposal will require expenditure of staff resources and would potentially divert staff from existing NPDES priority work. A prescriptive regulatory "cook book" approach for how to set monitoring requirements would be complex and probably not helpful, while consuming large amounts of staff and stakeholder time to develop.</p>	
Proposal 2	If a wastewater treatment plant has demonstrated a long record of good compliance for a certain parameter, allow for the reduction in monitoring frequency of that parameter.
<p>WB staff comments/concerns: We generally agree with the proposal and the Water Boards have already been reducing monitoring frequency for constituents where a history of good compliance has been demonstrated. Specific examples of situations where discharges have demonstrated a record of good compliance and have been denied reduced monitoring frequency would be helpful and add some additional context to the proposal.</p> <p>It may be helpful to develop general guidance that defines the constituents and situations that should trigger an assessment of whether monitoring frequency can/should be reduced or even eliminated. Formal guidance adopted as a regulation would potentially be difficult and counterproductive. Interpretation of what is reasonable is different for different stakeholders and is site-specific. Establishing a formal regulation would likely be difficult to develop and to justify and may have the unintended consequence of reducing flexibility to modify permit conditions in manner more beneficial to the permittee.</p>	
Proposal 3	When two or more relatively similar parameters are required to be monitored in an NPDES permit, the Water Boards should allow for a reduction or elimination of the monitoring requirements for one or more of the parameters.
<p>WB staff comments/concerns: We agree in concept with this proposal, and we have often selected a single constituent to represent a group of related constituents. This works well for some constituents like salts, where we can monitor electrical conductivity as a surrogate for TDS, chlorides, etc. The specific example cited of TSS and turbidity is problematic. TSS is part of the definition of secondary</p>	

Water Board Staff Evaluation of NPDES Stakeholder Cost of Compliance Proposals

treatment, so must be included as an effluent limit and be monitored in POTW NPDES Permits. Turbidity is one of the primary indicators of proper functioning of tertiary filters, and can be monitored continuously, so turbidity is needed for tertiary filtration POTWs. We agree with use of surrogates when consistent with state and federal requirements, but compliance monitoring is required for constituents with effluent limits.

II. Eliminate Monitoring and Reporting Requirements That Are Not Relevant to the Specific Permit at Issue or are Otherwise Unnecessary

Proposal 4	The requirement to prepare an SEMP should be based on the potential to cause or contribute to the exceedance of a water quality objective (i.e. a reasonable potential analysis (RPA)), similar to the requirements for other constituents).
<p>WB staff comments/concerns: We agree that SEMPs are not needed for all discharges under all circumstances. Once a SEMP is prepared and implemented, routine redrafting of the SEMP when the permit is renewed should not be needed. However, salt is a major problem within R5 and for most areas using water exported from R5. R5 salinity control is not just directed at achieving water quality objectives, but tries to reduce salt concentrations in waterbodies whenever feasible. Low salinity waters, such as the Sacramento River, provide dilution to waters with higher salinity, and provide dilution for ocean water carried by tidal action and Delta pumping into the Delta. Delta salinity control requires release of fresh water from storage to maintain Delta salinity, so any increased salt concentrations in the Sacramento River can require additional releases from reservoirs at some times of the year to maintain compliance with Delta salinity objectives, reducing available water supplies for other purposes. SEMPs are not required of all dischargers, and SEMPs do not need to be redone with every permit renewal unless there are significant salt issues with the specific discharge.</p> <p>Pollutant reduction is not prohibited if RP does not exist. The State and Federal anti-degradation policies allow degradation of high quality waters only when there are offsetting societal benefits – the SEMPs seek to minimize degradation of all waters, and particularly high quality waters.</p>	

Proposal 5	Consideration must be given to whether a Constituent Study or PPP adds value by providing new and meaningful information before it is required in a permit. If Constituent Studies must be required, a clear definition of what they should entail (and when they should be assigned) should be prepared for use by all Water Boards so that they are assigned consistently.
<p>WB staff comments/concerns: Additional clarity would be helpful. The proposal appears to be designed, in part, to rectify a problem that we believe has already been addressed (for the most part). Regional Boards have reviewed and corrected this inconsistency, but there may still be some permits with this issue. It would be helpful if specific examples were provided.</p> <p>The Water Boards may require a constituent study where there are indications that there is Reasonable Potential (RP) for a specific constituent, but there are not enough data to actually come to a conclusion on RP. Usually this is caused by a very small data set, or data sets have detected (but not quantified) concentrations that might be high enough to exceed water quality objectives if lower detection levels were required. In these instances, we require a special study of that constituent to develop additional data to determine RP. If we have already determined RP and set an effluent limit, there would not be a valid reason for including a constituent study in a permit.</p>	

Water Board Staff Evaluation of NPDES Stakeholder Cost of Compliance Proposals

To grant time schedules with MMP protection the Water Boards are sometimes required by the Water Code to require the discharger to complete a Pollution Prevention Plan. In some cases this is not useful, but there is no other option. For ammonia, a PPP may be desirable/useful in some cases because there may be operational or other changes that could reduce ammonia in the effluent while treatment facilities are being upgraded to meet ammonia effluent limits.

III. Facilitate Use of Regulatory Tools by Making Processes more Clear and Consistent

Proposal 6	The State Water Board should establish more clear and consistent guidelines for how WERs and translator studies can and should be used and encourage the Regional Water Boards to be more open to these options. In addition, the Water Boards should allow for (or facilitate) rationalized or watershed based translator studies for use by multiple dischargers.
<p>WB staff comments/concerns: We are not aware of specific situations where good WER or Translator studies are not being implemented. There may be a difference in opinion, however, as to what constitutes an adequate study. Translators must be site specific under federal regulations, but watershed based studies are currently used for WER (at least in R5). A Basin Plan amendment for site specific objectives for multiple San Francisco Bay segments utilizing WERs and translator studies was conducted for copper in Region 2. This has been a costly but successful process for dischargers. There are likely additional opportunities to implement these approaches in other areas, but additional resources would be needed from both the Water Boards and the discharges. Guidance on use of these studies from one POTW for permits on another POTW may be helpful tool for the Water Boards. Another factor to consider is that there have been objections to this approach from other stakeholders.</p>	
Proposal 7	The process for allowance and denial of dilution credits needs to be more clearly defined, and the State Water Board should establish more clear and consistent guidelines for how mixing zone studies and dilution credits can and should be used.
<p>WB staff comments/concerns: From our perspective dilution credits are often approved, but there can commonly be disagreements on the amount of dilution that should be granted. We can't be arbitrary, but dilution and mixing zones are discretionary under federal and state law and regulations. There may be instances where proposals for dilution meet all technical criteria, but there are overriding considerations that cause denial, such as for a discharge to already heavily stressed waterbodies where increased loadings may not be warranted. Allowance of dilution credits has been an ongoing policy discussion for Region 2 and Region 5, in general dischargers believe additional dilution credit should be granted, but there is often opposition from other stakeholders. Development of a statewide rule for the application of dilution credits may be equally as complex and time consuming as the current process, and potentially difficult to implement and lack flexibility.</p> <p>The process for reopening permits to adjust effluent limits for new studies, data, etc. requires a lot of staff time, so we will usually defer the changes to the next permit cycle unless the changes are critical to discharger planning or compliance.</p>	

IV. Establish a More Progressive Approach to Sanitary Sewer Overflow (SSO) Enforcement Actions

Proposal 8	<p>Enforcement actions need to be far more progressive in nature. When approaching SSO enforcement, the first step should be an inspection of a sanitary sewer system by Water Board staff and if necessary, required actions specified by the applicable regulatory agency, including a Notice of Violation when appropriate. Penalties should not be administered unless these lower level activities are proven to be unsuccessful. Municipal agencies strive to protect water quality and comply with all regulatory requirements, and even just a list of required actions through an official letter can be very effective in controlling SSOs.</p>
<p>WB staff comments/concerns: We understand that the NPDES POTW stakeholder group may be revising this particular proposal. It would be helpful if the stakeholders could provide some specific examples of SSO penalties that have been levied for minor violations where, in their view, a progressive enforcement approach was not used. In general, we agree that SSO enforcement should be progressive and we already strive to take enforcement in a progressive manner. We acknowledge the cost of paying penalties can be high and potentially detract from municipal budgets that support other compliance activities. Formal SSO enforcement action is typically reserved for more serious violations to correct long term patterns of violation or to create an incentive to complete avoided or needed capital improvements. While enforcement should be progressive, it is important to note that SSOs are a major human health issue and can be a significant aquatic ecosystem issue, so an effective enforcement program is important.</p>	

V. Reduce Sanitary Sewer Spill Reporting Requirements for Smaller Spills

Proposal 9	<p>Reduce or eliminate the individual spill reporting requirement for smaller spills that are under a certain threshold or do not reach waters of the state. Alternatively, if reporting is still required, the Water Boards should allow batch reporting in groups of 10 or 25 small SSOs, or allow reporting of such spills once a year in an annual report.</p>
<p>WB staff comments/concerns: Water Board staff has been working with stakeholders on this issue. We expect a revised MRP to be adopted soon that may address many or all of the reporting concerns that have been raised. We therefore recommend deferring further discussion on this specific proposal until the revised MRP is adopted.</p>	

VI. Consider Alternative Approaches to Addressing De Minimis Sources in TMDLs

Proposal 10	<p>TMDLs need to recognize that there are a number of approaches other than merely setting low limits for entities that are de minimis sources for the specific constituent, particularly when the only way to meet those limits is costly and energy-intensive advanced treatment.</p>
<p>WB staff comments/concerns: We agree that there are situations where more flexibility in TMDL development and implementation could be more cost effective and more efficient, but US EPA needs to be brought in to this discussion. Our experience in trying to reduce effluent limits or monitoring or studies for small sources in a TMDL is that US EPA will not approve a TMDL that does not address all NPDES permitted sources. The TMDL implementation plan can recognize small sources and have</p>	

Water Board Staff Evaluation of NPDES Stakeholder Cost of Compliance Proposals

reduced efforts for those sources, but they must be addressed to some extent. Some Regions are in the process of developing permit language for previously adopted TMDLs and looking for creative ways to reflect the flexibility in TMDLs. The proposed R5 OP Pesticide TMDL would not require an effluent limit if the pesticides are not detected in the effluent, which is an improvement over USEPA's position of requiring an effluent limit whether or not the constituent is detected. In Region 1, staff is investigating the potential for incorporating a trading program (offsets) in the TMDLs being developed for nutrients in Laguna de Santa Rosa. Expanded use of trading programs may have value, but they must be designed to prevent "hot spots" so that Offsets achieve water quality objectives in the waterbody as whole.

VII. Implement a Phased Approach to TMDLs

Proposal 11	State Water Board should move towards a phased implementation approach that selects the most appropriate approach as the first step for certain statewide water quality objectives (and TMDLs).
WB staff comments/concerns: We agree. We usually encourage source control as an initial implementation step, but sometimes we can't provide extended schedules for implementation/compliance due to NPDES compliance schedule policies. Federal law requires us to consider all sources of impairment, but there is flexibility with how loads (and responsibility) are allocated, and our Impaired Waters (TMDLs) Guidance includes adaptive implementation. We do not have the flexibility to find that costs are too high to require a POTWs to implement wasteload allocations (federal requirement), but additional flexibility and cost savings may be achieved through offset programs. The applicability of cost sharing approaches and allocations of costs is often a judgment/policy call that is case specific (e.g., pass through constituents, responsible party is not financially viable) and depends on the constituents being addressed. Court decrees, which may preclude extensive stakeholder process, represent another constraint to the use of cost sharing, phasing, and adaptive approaches.	

VIII. Clarify and Consistently Apply the Processes for Revising Water Quality Standards

Proposal 12	The Water Boards need to define a pathway to regulatory success for studies to support changes to beneficial use designations and water quality objectives. This could involve creating a task force of regulatory agency staff (from the Water Boards and USEPA), regulated community representatives, and other interested parties to explore the feasibility of creating a more certain regulatory environment for these alternative mechanisms, such as development of screening criteria, a procedures manual, and a mediation process for use if disputes arise.
WB staff comments/concerns: We don't object to exploring this proposal further or to creating a joint task force to evaluate options to provide increased regulatory certainty for changes to uses or objectives. It is inherently easier to add a use than to remove one, since it is easier to prove a use exists than to prove it does not. Additionally, US EPA's definition of existing use criteria makes it difficult to remove uses. Conducting the studies, however, will never guarantee an outcome will be beneficial to the POTW (for example if study demonstrates that a use exists). CVSALTS is looking at this exact issue for identifying and correcting inappropriate or incomplete beneficial use designations, and trying to deal with large numbers of waterbodies at the same time, not one by one. It may be useful to evaluate past attempts to remove uses and determine the reasons why the efforts have been unsuccessful. Region 5 also helped clarify issues for de-designation of MUN uses for New Alamo Creek. That knowledge is being applied to other waterbodies, but it's still a lengthy process.	

Water Board Staff Evaluation of NPDES Stakeholder Cost of Compliance Proposals

Proposal 13	The Water Boards need to develop a methodology for proper designation and de-designation, which includes taking a big picture view of the value of these tools, how these actions are taken and whether they are appropriate. There also needs to be a better balance between the volume of studies and evidence required to de-designate a waterbody versus the level of information routinely used to designate uses in the first instance.
WB staff comments/concerns: See above.	

IX. Consider Impacts to Design Approach and Related Costs When Considering Defining Compliance Parameters

Proposal 14	<p>Though this approach could be relevant for many areas, two examples of wastewater treatment costs that demonstrate this principle are as follows:</p> <ol style="list-style-type: none"> 1. Change allowable chlorine residual from 0 all of the time to <0.2 for more than 5 minutes per day. Every treatment plant that dechlorinates its effluent with sulfur dioxide or sodium bisulfite adds an excess to ensure compliance if anything unexpected goes wrong. For many agencies, the excess of sodium bisulfite often exceeds 1 ppm. In Region 2, these excess additions are often done for outfalls receiving initial dilution approaching 100:1. The oxygen demand of this excess sodium bisulfite far exceeds the ecological benefits associated with 0 ppm of chlorine residual every second of every day. 2. Define nutrient removal in terms of annual loads or seasonal loads rather than “maximum daily” concentrations. The ecological relevance of nutrient concentrations is more associated with weeks to months (or seasons) than minutes to days. In addition, nutrients can be quickly washed from a system during a rainy winter so nutrient loading during times of the year when the water residence time is long, winds are weak, and strong stratification is possible are the critical times of concern for nutrient concentrations.
<p>WB staff comments/concerns: We agree with the chlorine residual proposal and similar approaches have been adopted when the discharger has provided studies demonstrating that small chlorine discharges are not adverse. We recognize these studies can be costly for the discharger. The proposal could be addressed by a statewide chlorine policy, which has been identified as a potential Water Board project for a number of years, but has not been pursued due to intervening priorities. It would be beneficial to develop a chlorine policy, but resources are needed.</p> <p>We also agree with the nutrient concepts, but longer term averages may not be appropriate to protect against aquatic toxicity (e.g., ammonia toxicity) or public health (e.g., nitrate MCL). In some cases, longer term averages may be appropriate but the science is needed to provide support. This issue may be addressed through the Water Boards Nutrient Numeric Endpoints project. Federal requirements generally require monthly, weekly or daily limits, but with supporting science we can deviate in some circumstances. Aspects of the SIP could also be updated to address some of these concerns.</p> <p>Region 5 has adopted longer term limits for some non-CTR constituents, but there has been resistance from USEPA and other stakeholders.</p>	

Tri-TAC BIOSOLIDS LAND COMMITTEE

AGENDA

June 13, 2013

Carollo Engineers, Sacramento CA

Item No.	Topics	Lead Person	Est. Time (minutes)	Attachments
1.	CASA Strategic Planning Retreat Summary	V. De Lange	10	
2.	Regulatory/Legislative/Legal Updates <ul style="list-style-type: none"> ▪ Ordinances Update <ul style="list-style-type: none"> - Imperial - San Luis Obispo - Solano (+Measure E) ▪ Kern (Measure E/Litigation/AB 371) ▪ AB 997 Composting – Anaerobic Digestion 	G. Kester/L. Baroldi G. Kester/D. Gilbert G. Kester		
3.	State and Regional Updates <ul style="list-style-type: none"> ▪ CalRecycle FOG/Food Waste Digestion ▪ CalRecycle 75% Diversion Plan ▪ CDFR Regulations on Rendering 	G. Kester G. Kester/V. De Lange G. Kester	15	
4.	EPA and Nationwide Updates <ul style="list-style-type: none"> ▪ EPA Disinvestment in Biosolids ▪ Biosolids Solid Waste Definition/EPA MACT Standards ▪ Arsenic Cancer Slope Factor ▪ New Proposed FDA Rules 	G. Kester	15	
5.	Regional Facilities Updates <ul style="list-style-type: none"> ▪ Bay Area Agencies ▪ So. Cal. & C.V. ▪ IERCF ▪ Westlake Farms ▪ TIRE 	B. Gillette, B. Jones T. Meregillano/E. Have M. Bao M. Bao D. Gilbert	15	
6.	Industry Association Updates <ul style="list-style-type: none"> ▪ WEF ▪ CASA ▪ CWEA ▪ SCAP ▪ BACWA ▪ CVCWA 	G. Kester/V. De Lange G. Kester J. Hay M. Bao M. Krupp B. Gillette	10	
7.	Emerging Contaminants <ul style="list-style-type: none"> ▪ Pyrethroid Working Group ▪ Trace Organics Activities 	G. Kester	10	
8.	Biosolids Research <ul style="list-style-type: none"> ▪ WEF Biogas Study ▪ Other 	G. Kester	5	
9.	Conferences/Webinars <ul style="list-style-type: none"> ▪ CBA Symposium, Sept 18-19, 2013 	All	5	
10.	Information Sharing	All	10	

Tri-TAC Water Committee Key Issue Summary

(as of
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Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Links	Lead(s)	Next Steps	Due Date
1	<p>Whole Effluent Toxicity</p> <ul style="list-style-type: none"> State is developing a new Toxicity Policy that will dictate how toxicity is reported and enforced. 	<ul style="list-style-type: none"> Draft State Toxicity Policy issued in 2011 would establish/ require: <ul style="list-style-type: none"> numeric limits for chronic toxicity use of Test of Significant Toxicity (TST) as statistical method to determine toxicity (concerns it will lead to more false positive results); use of marine organisms in >1,000 mg/L salinity waters which affects current use of flow-through testing for acute-toxicity single test failure triggers violation and accelerated monitoring RWQCB discretion on inclusion of acute toxicity in permits and whether to allow for dilution 	<ul style="list-style-type: none"> State Board held a workshop late August. Stakeholders thought that the proposed policy would initiate too many changes at once. Instead, it might be easier to breakdown the changes into phases, thus reducing impacts on stakeholders. The phasing logistics still need to be discussed and other board members need to be introduced to the idea. The initial ideas on phasing would focus on gathering a data set with the new TST without having penalties associated with the results. Stakeholders could use this data to determine the real effect of the TST in the regulatory setting. We should define the successful criteria needed to move from phase 1 to phase 2. Running the "test" of phase 1 would be expensive for POTWs, and we may want to consider running phase 1 test on POTWs over a certain size. We need to address the potential issue of anti-backsliding and the differences between acute testing versus chronic testing. Tri-TAC voiced concern with uncertainty in the WET Policy and SB plans to address our concerns to a certain degree. Storm Water representatives weren't interested in our proposed phasing approach. 	<p>State Board Page</p>	<p>Bobbi Larson, Phil Markle</p>	<ul style="list-style-type: none"> Work group is looking at numeric water quality standard impacts on discharges to erroneously (based on false positive tests) listed 303(d) water bodies. We may have to write a proposal for phasing the policy and present it to the Board at the hearing. Jon recommended that our proposal be specific on the phasing—it may take a lot of work to create this document. We should create a document that highlights the comments received in the comment letters and how the phased approach would address those comments (this would explain why the phasing approach is the best way to move forward.) We need to reach out to POTWs to see if they are OK with our proposal. 	
2	<p>Recycled Water Policy</p> <ul style="list-style-type: none"> State Water Board is modifying the monitoring requirements for CECs in the policy to implement the Expert Panel's recommendations. 		<ul style="list-style-type: none"> State Board revised the water monitoring requirements for recycled water. Comments are due in July on the most recent draft. State Water Board is amending the recycled water policy to address monitoring for CECs. An expert panel informed the Board and it seems that they will focus on ground water recharge and not irrigation uses of the recycled water. It seems that the policy on CECs is getting close to closure and a majority of our concerns are being addressed. 		<p>Bobbi Larson</p>	<ul style="list-style-type: none"> Work on draft comment letter (possibly joint letter with other associations) 	
3	<p>Nutrient Policy</p> <ul style="list-style-type: none"> This effort is part of a statewide initiative, supported by the U.S. EPA Region IX and the SWRCB, to establish numeric water quality standards, expressed as NNEs, for State Waters 	<ul style="list-style-type: none"> Any POTW that discharges to inland surface water will be affected under the policy. Adoption of a statewide approach to nutrient control will affect NPDES permitting, 303(d) listings, and TMDL development. Possible outcomes associated with the policy include stringent numeric endpoints for total nitrogen and phosphorus. 	<ul style="list-style-type: none"> Small group of stakeholders met with the State Board to discuss possible approaches to the statewide nutrient policy. Stakeholders advocated for a policy that is based in science, doesn't have predetermined low limits, and an open process. The QUAL-2 model will likely result in very low nutrient numbers that are very conservative and unlikely to be regularly attainable by POTWs. . Restarting process for the SF Bay, led by R2. Will look at relationship between nutrient concentrations and harmful algal blooms. Will also look at DO, which is becoming increasingly important. Nutrient conference is being proposed for SFBay 		<p>Tom Grouvhog</p>	<ul style="list-style-type: none"> Develop a strategy Possibly investigate how the State of Utah (or other states) have addressed the nutrient standard changes. 	

Tri-TAC Water Committee Key Issue Summary
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Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Links	Lead(s)	Next Steps	Due Date
			estuary.				
4	CECs <ul style="list-style-type: none"> Pharmaceuticals and other trace constituents of emerging concern (CECs) are ubiquitous in wastewater at low concentrations and have unknown effects on aquatic organism 	<ul style="list-style-type: none"> The State Board, along with Southern California Coastal Water Research Project (SCCWRP), has been working with the Ecosystems Advisory Panel to determine next regulatory steps. The panel will recommend monitoring wastewater for CECs, and possibly bioanalytical assays to test for toxic effects 	<ul style="list-style-type: none"> The Water Board is trying to decide how to implement the Ecosystem Advisory Panel report on CECs. The panel created an initial list of CECs for monitoring. However, a study needs to be done to evaluate the different types of receiving water and treatment types. There are options to pay for this study: SWAMP surcharges could increase in NPDES permit fees, state board could direct certain POTWs to pay for the study, the state board could not do the study, or stakeholders could volunteer to participate and fund the study. WERF may be a source of funding if stakeholders decide to manage the study. Jon Bishop will likely recommend that the Board accept our recommendation that POTWs initiate studies on their own accord. CECs may be an important topic for Board Member Felicia Marcus. 	Draft Report	Chris Stacklin	<ul style="list-style-type: none"> Wait for final report and await Determine our preference for how this study should be conducted and funded. 	
5	Statewide Mercury Policy <ul style="list-style-type: none"> Policy will likely incorporate methylmercury objectives being developed along with control plans for mercury impaired waterbodies Mercury Control Program for Reservoirs will be developed first and will address all mercury impaired reservoirs included on the 2010 303(d) list Future elements of the policy could include control programs for future impaired reservoirs, rivers/creeks/streams/enclosed bays/coastal bays/estuaries/lagoons impaired by mercury, NPDES permitted sources, and nonpoint sources 	<ul style="list-style-type: none"> Any wastewater that discharges to a mercury-impaired waterbody will eventually be included under the policy The State Board is considering ways to harmonize efforts with existing TMDLs If control program for NPDES permitted sources is developed implementation measures such as mercury-specific pollution prevention, installation of amalgam separators for dental offices, and improving wastewater treatment may be required. 	<ul style="list-style-type: none"> State Board will be holding CEQA Scoping Meetings: Sacramento- March 5, Oakland- March 6, Redding- March 8, and Riverside- March 12 Tri-TAC provided comments urging them to harmonize with existing TMDLs and link implementation to impairment Existing TMDLs will likely be grandfathered in 	State Board Mercury Page	Tom Grovhoug	<ul style="list-style-type: none"> Continue to provide input at public meetings and submit comments 	
6	Methylmercury Objectives <ul style="list-style-type: none"> State Board is developing methylmercury fish tissue objective The scientific underpinnings for the criteria development are still under consideration 	<ul style="list-style-type: none"> If point source dischargers cannot comply with criteria, then an implementation strategy would be included in permits 	<ul style="list-style-type: none"> State Board is restarting this effort continuing from the alternatives developed in 2006. The project will move in parallel with the Statewide Mercury Policy The objectives will likely be a part of the final Statewide Mercury Policy 	State Board Mercury Page	Tom Grovhoug	<ul style="list-style-type: none"> Working with State Water Board and to iron out issues 	
7	Biological Objectives <ul style="list-style-type: none"> The State Board is developing a framework to develop biological objectives 	<ul style="list-style-type: none"> If biological impairment is found to be caused by a pollutant, it could impact how NPDES permits are written and permit limits. 	<ul style="list-style-type: none"> The current evaluation will focus on invertebrates but they may add algae criteria in the future. Tri-TAC sent a letter in February to State Board with 	State Board Biological Objectives Page	Phil Markle	<ul style="list-style-type: none"> Finalized BO documents were not available at the time of the 	

Tri-TAC Water Committee Key Issue Summary
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Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Links	Lead(s)	Next Steps	Due Date
	(biocriteria) that assign narrative or numeric benchmarks to protect aquatic life beneficial uses.		<p>comments on the Scientific Basis for development of Biological Objectives.</p> <ul style="list-style-type: none"> • John Bishop talked to CVCWA about focusing comments on the “no project” alternative as the way to proceed with this policy. If we can comment that there are no “reference” streams in certain regions, we might show that this idea won’t work. • Based on conversations with the regulators, it seems that their intent is to protect high quality streams. If this is the objective, we should try to steer the BO towards that goal. • Central Valley ecoregion has almost no area that can be considered “reference” and south coast has very little, so they need way to deal with this. Highly modified channels are also a problem. • Science Advisory Panel believes they can apply a statistical method to develop biological objectives in these areas. • Everyone will have to prevent degradation of the stream that has no reference condition. 			<p>February comment letter, so Tri-TAC needs to monitor the BO process to see when formal documents are available for review.</p> <ul style="list-style-type: none"> • Tri-TAC should form a workgroup – SRCSD will be involved, Dan Jackson from EBMUD. 	
8	<p>SSS WDR</p> <ul style="list-style-type: none"> • The Monitoring and Reporting Program for the SSS WDR is being revised by the State Board 	<ul style="list-style-type: none"> • State Water Board held a public workshop on January 24, 2012 to discuss the SSS WDR next steps. They have indicated that the next draft will contain the following revisions: <ul style="list-style-type: none"> ○ Removed some reporting requirements ○ Remove mandatory reporting of Private Lateral Spills, and require enrollees to keep internal records of them • State Board is proposing updates to the MRP in lieu of updating the entire WDR. • Require private collection systems that discharge to private treatment works to enroll, but do not require private collection systems tributary to other sanitary sewer systems to enroll 	<ul style="list-style-type: none"> • A small group of stakeholders held meetings with the State Board to discuss the changes to the MRP. The group is making progress towards a finalized MRP. • The new MRP will likely have three categories of SSOs.State Board wants to have the updated MRP finalized by May 2013. 	Draft SSS WDR	Bobbi Larson, Monica Oakley	<ul style="list-style-type: none"> • Stakeholder group submitted their latest MRP proposal to the State Board on March 6, 2013. We are waiting to hear back from their staff. 	

Tri-TAC Water Committee Key Issue Summary
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Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Links	Lead(s)	Next Steps	Due Date
9	Delta Issues <ul style="list-style-type: none"> Standing topic to discuss issues in the Delta that can have statewide impact. Delta plan is moving forward, 6th draft should be out in next week. Key issues is that water quality authority should reside with State and Regional Board Notice that longfin smelt is ESA smelt. Threat is low flow in SF Bay estuary and ammonia. State Board is updating Bay Delta Plan 	<ul style="list-style-type: none"> Ammonia discharged from POTWs has been suggested to be disrupting the food-web, and ultimately contributing to the decline of pelagic fish populations in the Bay-Delta estuary This rationale was used by the Central Valley RWQCB to support requiring Sacramento Regional County Sanitation District to upgrade to nitrification, at an estimated cost of \$800 million Various studies to resolve uncertainties related to the impacts of ammonia are underway SRSD has very tight pathogen limits that can't be met by disinfection that may be precedent setting for other POTWs 	<ul style="list-style-type: none"> Water Agencies submitted comments on draft permits for CCCSD and Vallejo, citing ammonia research and requesting nitrification In permit adopted Feb 2012, Regional Board required CCCSD to perform nutrient studies The Delta Stewardship Council released the final draft of the Delta Plan in September 2012. State Water Board is holding a hearing on the potential changes to San Joaquin River flows and Southern Delta WQ on March 20 and 21. 		Terrie Mitchell	<ul style="list-style-type: none"> Continue to track issues as they emerge and act on those with state-wide significance 	
10	Ocean Plan Amendment <ul style="list-style-type: none"> A California Ocean Plan amendment is proposed to address designation of, and implementation provisions for, State Water Quality Protection Areas, including both ASBS and non-ASBS (called "General Protection") SWQPAs 	<ul style="list-style-type: none"> The Resolution specified that no new limiting conditions or prohibitions are to be imposed on wastewater outfalls as a result of a SWQCB-General Protection or as a result of non-ASBS SWQPAs themselves. The Resolution stated that no conditions are to be included in permits that require the removal or relocation of municipal wastewater outfalls, in recognition of the public service and investment that these facilities provide. 	<ul style="list-style-type: none"> Comment letter submitted and Tri-TAC testified at State Water Board hearing The State Board seems to recognize the importance of the existing sewer infrastructure and the potential impacts of Ocean Plan changes. State Board may adopt the amendment at the second October board meeting. California Ocean Plan amendment specifies that no new regulatory requirements will be imposed on existing POTW outfalls The State Board indicated that they won't write NPDES permit requirements based only on the MPAs. Does this mean that they can find other reasons to write limits in the permit to address MPA issues? 		Sharon Green	<ul style="list-style-type: none"> Await for response to comments from State Water Board 	
11	EPA Ammonia Criteria <ul style="list-style-type: none"> EPA is in process of updating the current WQC for ammonia to incorporate new data and sensitive freshwater mussel ammonia toxicity data. This latest update is intended to eventually replace their current WQC for freshwater (marine criteria are unaffected by this update) and will result in much lower WQC than the previous update. 	<ul style="list-style-type: none"> In a 2009 update, EPA proposed a single national criterion for ammonia assuming freshwater mussels are present The mussels present assumption results in extremely low objectives and is not appropriate for the majority of CA waters where freshwater mussels are not present 	<ul style="list-style-type: none"> EPA's request for Scientific Views "closed" in April 2010, final adoption of the criteria has not been proposed at this time. 		Tom Grouvhog/ Phil Markle	<ul style="list-style-type: none"> Track and provide comments when necessary 	
12	EPA Water Quality Criteria <ul style="list-style-type: none"> EPA is proposing changes to the water quality criteria regulations regarding administrator determinations, attainable uses, triennial reviews, compliance schedules, antidegradation, and variances. 	<ul style="list-style-type: none"> Key elements likely to be included in the regulation: <ul style="list-style-type: none"> Antidegradation- States must adopt binding anti degradation requirements and minimum implementation methods Attainable uses- when use is not attainable, State must specify next highest attainable use 	<ul style="list-style-type: none"> The regulation is being reviewed by the Office of Management and Budget and will be released in Spring 2012 for comment. 		Shannon Bishop	<ul style="list-style-type: none"> Track and provide comments when necessary Work with NACWA on comments 	

Tri-TAC Water Committee Key Issue Summary
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Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Links	Lead(s)	Next Steps	Due Date
		<ul style="list-style-type: none"> • Triennial review- current criteria should be examined • Variance- requirements will be specified 					
13	EPA Integrated Permitting <ul style="list-style-type: none"> • EPA effort to integrate municipal stormwater and wastewater plans in relation to the CWA. The integrated planning process will potentially identify efficiencies in implementing overlapping and competing requirements that arise from separate wastewater and stormwater projects, including capital investments and operation and maintenance requirements. 	<ul style="list-style-type: none"> • The integrated permitting approach could be beneficial for POTWs because it is intended to help municipalities meet their CWA obligations by optimizing their infrastructure improvement investments through the appropriate sequencing of work. • Is there a way to harmonize with Porter Cologne in California? • EPA integrated permitting document came out as a draft. This is driven by urban mayors. There wasn't a lot of substance, although one issue raised was removing 5-yr permit cycle 	<ul style="list-style-type: none"> • EPA held several listening session in January and February 2012 and is developing a draft framework document to describe the integrated planning concept, likely to be released in Spring 2012 • Had a call to set up work group to come up with list of issues that should be considered 		Ben Horenstein/ Jackie Kepke	<ul style="list-style-type: none"> • Continue tracking this effort along with NACWA • Review draft framework document when released 	
14	Electronic Reporting <ul style="list-style-type: none"> • Agencies are now required to electronically report compliance data to their regional boards via CIWQS • State Board is working on eSMR 2.5 that will allow for electronic submittal of EPA required self-monitoring data 	<ul style="list-style-type: none"> • Errors are often propagated when the data are made public, and they are also often presented out of context (e.g. presenting exceedences as violations) • Errors are difficult to correct • Finalization of eSMR 2.5 will require a different data file type to be submitted electronically 	<ul style="list-style-type: none"> • State Board is beta-testing eSMR 2.5 • Full implementation likely required by Summer 2012 • Once released, State Board will provide training for the new program 		Shannon Bishop	<ul style="list-style-type: none"> • Working with State Water Board to beta test system • Participate in State Board CIWQS User Group 	
15	EPA Dental Amalgam <ul style="list-style-type: none"> • October 26, 2011 - EPA released its 2010 Effluent Guidelines Program Plan announcing its intent to adopt guidelines on the use of dental amalgam by dentists 	<ul style="list-style-type: none"> • Agencies are concerned that dentists' offices will be regulated as part of POTWs' pretreatment program • EPA will likely create a new category so that dentists will not be categorized as SIUs • They may also grandfather in existing regional dental amalgam programs 	<ul style="list-style-type: none"> • EPA had planned to propose a rule in 2011 and finalize in 2012, but they appear to be behind schedule. Expect to hear something in the fall. • EPA will likely create a new category so that dentists will not be categorized as SIUs • They may also grandfather in existing regional dental amalgam programs 		Tim Potter	<ul style="list-style-type: none"> • Comment on draft guidelines when they are released 	
16	Pesticides <ul style="list-style-type: none"> • Cross-media issue • Most pesticides, including pyrethroids, are currently unregulated in wastewater other than by narrative toxicity standards. Some pesticides are toxic to sensitive organisms at extremely low concentrations. • Nanoparticles and some biocides have potential to interfere with biological treatment processes • Some pesticides like triclosan, fipronil, and nanosilver are considered CECs 	<ul style="list-style-type: none"> • In the future, POTWs could be regulated for pyrethroids, which they can't control and are toxic to sensitive organisms at very low levels. Engagement at this stage could steer regulators to adopt strategies favoring source control • Other pesticides may contribute to levels of regulated pollutants (e.g., copper, silver), cause or contribute to effluent toxicity, interfere with biosolids management options, challenge water recycling programs, or cause process interference. • POTWs are participating in a long-term joint program with stormwater and the water boards to work cooperatively with pesticide regulators to use their pesticide regulatory authorities prevent pesticide-related POTW compliance and operational problems. 	<ul style="list-style-type: none"> • Pesticide Work Group is continuing to work with pyrethroid manufacturers and DPR toward conducting a statewide survey of pyrethroids in POTW influent, effluent, and biosolids. 		Pesticide Work Group: Greg Kester, Linda Dorn, Preeti Ghuman, Phil Markle, Dave Snyder, Melody LaBella, Karin North, Kelly Moran	<ul style="list-style-type: none"> • Comment on upcoming EPA review work plans for two pyrethroids (Resmethrin, Prallethrin). 	

Tri-TAC Water Committee Key Issue Summary
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Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Links	Lead(s)	Next Steps	Due Date
17	<p>DTSC Safer Consumer Products Regulation</p> <ul style="list-style-type: none"> The Department of Toxic Substances control is developing new regulations that will allow chemicals to be controlled without recourse to the legislature. 	<ul style="list-style-type: none"> This could be an important tool for POTWs to prevent the discharge of toxic substances to their influent. 	<ul style="list-style-type: none"> BAPPG commented on DTSC's draft Green Chemistry regulations in December 30, 2011, and Tri-TAC and CASA issued letter of support for these comments Green Chemistry workshop was held in early September and comments are due by October 11th. 	Draft DTSC Regulations	Karin North, Melody LaBella, Kelly Moran	<ul style="list-style-type: none"> Comment on Green Chemistry regulations due on October 11th. BACWA will write letter and Tri-TAC may sign on the letter if warranted. 	

Tri-TAC Land Committee Key Issue Summary

(as of June 4, 2013)

Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Lead(s)	Next Steps	Due Date
Goal: Support Long-term Viability of Land Application Options						
1	<p>Local County Ordinances</p> <ul style="list-style-type: none"> ▪ Imperial ▪ San Luis Obispo: Ordinance placing restrictions on Class B biosolids land application. ▪ Solano Ordinance: Ordinance requires agencies to divert a portion of biosolids to Class A or B2E facility by 2012; annual progress reporting. ▪ Solano Measure E (1984): This measure restricts waste imported from other counties and is currently in litigation. If upheld and enforced, 90% of imported waste (up to 820,000 tpy) would be banned. ▪ AB 845, Ma, Solid Waste Place of Origin – This bill prohibits an ordinance enacted by a city or county from otherwise restricting or limiting the importation of solid waste into a privately-owned solid waste facility in that city or county based on place of origin. ▪ Kern (Measure E): A voter-approved ordinance that would prevent land application of biosolids in unincorporated parts of the county. A legal challenge was brought in state court in Jan 2011 after dismissal of a federal appeal by the 9th Circuit, in Nov 2010. A Preliminary Injunction (PI) was granted by Tulare County Judge Hicks in Jun 2011. ▪ AB 371 Sewage Sludge was introduced by Assembly member Rudy Salas (D-Bakersfield). This bill authorizes the Kern County Board of Supervisors to prohibit, by ordinance, the land application of sewage sludge in unincorporated areas in the county. The bill essentially circumvents what has been litigated over the past seven years in response to the voter-approved Measure E which attempted the same ban. 	<ul style="list-style-type: none"> ▪ Potential loss of existing and future land application practices. ▪ Increased biosolids management costs (e.g., longer hauling distances, more expensive alternative practices). 	<ul style="list-style-type: none"> ▪ Imperial: Advocacy efforts to challenge ordinance ban on biosolids is on hold until a final decision on Kern County Measure E case is made. ▪ San Luis Obispo: On 3/12/13, the Board of Supervisors (BOS) unanimously approved the extension of the existing interim biosolids ordinance until March 2017 as requested by County staff and supported by wastewater agencies/CASA. By extending the interim ordinance until 2017, the County is provided time to review current science/key issues and consult with others, in order to draft a new ordinance. The BOS committed to providing funding through the budget process to allow the Department of Health the ability to perform due diligence as they work on a new ordinance. During public testimony, a statement was made that Kellogg ceased using biosolids for producing compost. ▪ The Inland Empire Composting Regional Authority Project Manager (Jeff Ziegenbein) confirmed that Kellogg is no longer selling and marketing compost products containing biosolids. ▪ Solano: The Board of Supervisors would like a court decision as to whether Solano's Measure E is moot under AB 845. No decision yet on whether to pursue a summary judgment under AB 845. ▪ AB 845 (Ma), Solid Waste Place of Origin: Signed by the Governor. ▪ Kern (Measure E): Kern filed a petition to the California Supreme Court to review a recent ruling from the Fifth Appellate District, which granted to publish its opinion affirming the preliminary injunction against the Kern County ordinance banning the land application of biosolids. ▪ AB 371: Strong advocacy efforts by CASA and individual agencies assisted in stopping this bill from being heard on the assembly floor on 5/16. 	G. Kester D. Gilbert L. Baroldi	<ul style="list-style-type: none"> ▪ Currently on hold ▪ San Luis Obispo: Attend Board of Supervisors meeting. ▪ Kern (Measure E): Continue to track appeal of PI. ▪ None. 	

Tri-TAC Land Committee Key Issue Summary

(cont'd)

Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Lead(s)	Next Steps	Due Date
Goal: Sustain and Develop Biosolids Management Options with Focus on Sustainability						
2	FOG/Food Waste Digestion Program Regulation <ul style="list-style-type: none"> ▪ CalRecycle vs. State/Regional Board oversight 	<ul style="list-style-type: none"> ▪ Ensure that existing and future programs are regulated under NPDES permit framework by Water Boards rather than under SW regulations by CalRecycle. ▪ Review and comment on draft/proposed regulations that may impact existing and planned programs. 	<ul style="list-style-type: none"> ▪ CASA and Tri-TAC member agencies continue to work with CalRecycle and SWRCB to develop language to exempt POTWs from processing/storage permits and proposed NDPEs permit language. 	G. Kester	<ul style="list-style-type: none"> ▪ G.Kester to hold discussions with SWRCB (J. Gonzales) and CalRecycle (B. Holmes). 	
3	CalRecycle 75% Recycling, Composting or Source Reduction of Solid Waste by 2020	<ul style="list-style-type: none"> ▪ May prohibit agencies from claiming recycling credits for utilizing biosolids as an alternative daily cover (ADC) for landfills. 		G. Kester	<ul style="list-style-type: none"> ▪ CASA/Tri-TAC members to work with CalRecycle on ADC issue. 	
4	Rendering Facility Regulations <ul style="list-style-type: none"> ▪ California Department of Food & Agriculture (CDFA) 	<ul style="list-style-type: none"> ▪ Ensure that existing and planned FOG acceptance programs are not subject to rendering facility permitting requirements by CDFA. 	<ul style="list-style-type: none"> ▪ New rendering regulations effective 4/1/13 from CDFA governing inedible kitchen grease (FOG) and manifests to track it. Some highlights of the new regulations include and require: <ul style="list-style-type: none"> - An exemption from rendering requirements for wastewater plants accepting inedible kitchen grease from grease traps or interceptors. - A requirement that the transporter be licensed by CDFA and maintain a manifest system. - Receiving facilities may now accept manifest information electronically, can enter into an agreement to allow the transporter to sign manifest on their behalf, but must maintain a copy of the manifest for two years. 	G. Kester	<ul style="list-style-type: none"> ▪ G. Kester to follow up with CDFA regarding slaughter house exemption. 	
5	Biosolids Solid Waste Definition	<ul style="list-style-type: none"> ▪ CISWI rules could have applied to POTWs utilizing methane in an internal combustion (IC) engine. 	<ul style="list-style-type: none"> ▪ EPA released a clarification letter that it did not intend to define methane transported in a pipe for combustion in an IC engine as a solid waste. 	G. Kester	<ul style="list-style-type: none"> ▪ Ensure clarification letter is widely distributed. 	
7	FDA – Proposed Food Safety Rule	<ul style="list-style-type: none"> ▪ Proposed rule may spur potential controversy. 	<ul style="list-style-type: none"> ▪ On 1/16/13, FDA published (in the Federal Register) proposed rules for the handling, storage, and safety of produce in the U.S. The use of biosolids is mentioned in the proposed rule; use is permissible as long as it is in compliance with EPA regulations (CFR503). B. Bastian and B. Brobst (EPA staff) have offered their services in providing responses to comments received. Comments are due 5/16/13. 	G. Kester	<ul style="list-style-type: none"> ▪ Support proposed rule. ▪ G. Kester to review proposed regulations. 	
8	EPA Disinvestment in Biosolids	<ul style="list-style-type: none"> ▪ May reduce EPA's oversight of biosolids management activities. 	<ul style="list-style-type: none"> ▪ EPA has reconsidered its original intent to disinvest in biosolids program oversight. EPA is proposing to hire two full-time personnel in Region 7 who will be handling all biosolids compliance issues and may oversee annual report review. ▪ G. Kester discussed disinvestment issues with EPA in D.C. 		<ul style="list-style-type: none"> ▪ Support EPA staffing in Region 7. 	
9	WEF – NBP Update	<ul style="list-style-type: none"> ▪ May impact EMS Certification Program. 	<ul style="list-style-type: none"> ▪ Ned Beecher was hired to support the EMS certification program. 	G.Kester/ V. De Lange	<ul style="list-style-type: none"> ▪ Continue to track and monitor. 	
10	Legislation Congressman Serrano – Labeling Bill	<ul style="list-style-type: none"> ▪ May impact land application of biosolids. 	<ul style="list-style-type: none"> ▪ Introduced on 1/4/13, H.R. 213 Serrano - A bill to amend the Food, Drug, and Cosmetic Act and the egg, meat, and poultry inspection laws to ensure that consumers receive notification regarding food products produced from crops, livestock, or poultry raised on land on which sewage sludge was applied. ▪ Last Action: Referred to the House of Agriculture Committee on 1/4/13. 	L. Baroldi	<ul style="list-style-type: none"> ▪ Continue to track and monitor. 	

Tri-TAC Land Committee Key Issue Summary

(cont'd)

Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Lead(s)	Next Steps	Due Date
11	EPA Maximum Available Control Technology (MACT) Standards	<ul style="list-style-type: none"> Ability to comply with new regulations is currently uncertain. NACWA and NRDC filed a request for reconsideration and advance notice of possible litigation. 	<ul style="list-style-type: none"> Oral arguments were held on 5/3/13 as part of NACWA's litigation challenge to EPA's sewage sludge incineration (SSI) rule, with the Association aggressively challenging EPA's legal basis for its new SSI regulations. NACWA is hopeful for a ruling from the court within the next 3-4 months 	G. Kester/L. Baroldi	<ul style="list-style-type: none"> Continue to track and monitor litigation if filed. 	
12	Arsenic Cancer Slope Factor <ul style="list-style-type: none"> In Feb 2010, EPA proposed a 17-fold increase in the cancer slope factor for inorganic arsenic based on questionable interpretations of available data. 	<ul style="list-style-type: none"> If adopted, the new cancer slope factor would likely impact recycled water, effluent and biosolids limits. 	<ul style="list-style-type: none"> National Academy of Sciences is reviewing the process in which EPA used to develop the arsenic slope factors (IRIS) and the research that supported the slope factor. 	G. Kester	<ul style="list-style-type: none"> Continue to track, monitor, and comment as efforts proceed. 	
13	South Coast AQMD Rule 1110.2 <ul style="list-style-type: none"> Upon adoption in 2008, the rule included a requirement that a technology assessment (TA) be completed by 7/1/10 to demonstrate that commercially-available technologies exist to cost effectively allow compliance with NOx, VOC, and CO limits. 	<ul style="list-style-type: none"> Emission limits would jeopardize ability of IC engines to utilize methane, 	<ul style="list-style-type: none"> 2/7/13 Meeting – SCAQMD – Biogas Impacts on Rule 1110.2 There is a need to work with power companies and negotiate a fair process to accept biogas. 	G. Kester	<ul style="list-style-type: none"> Initiate conversation with power companies on a fair process to accept biogas. 	
Goal: Share Information						
14	Regional Facilities <ul style="list-style-type: none"> <u>Bay Area Agencies</u>: A coalition of 18+ agencies is developing a regional biosolids management facility. <u>Southern CA & Central Valley</u>: Biosolids projects and facilities in Southern and Central Valley regions. <u>Inland Empire Regional Composting Facility (IERCF)</u>: Indoor composting facility located in Rancho Cucamonga, owned by LACSD/IEUA. <u>Westlake Farms</u>: Covered ASP composting facility located in Kings County, CA developed by LACSD. <u>Terminal Island</u>: The City of Los Angeles and its partners operate the Terminal Island Renewable Energy (TIRE) biosolids injection project, which is designed to reduce greenhouse gas emissions and create renewable energy. 	<ul style="list-style-type: none"> Maintain awareness of collaborative efforts to develop regional biosolids management facilities. Understand challenges and lessons learned from new facilities in startup or operation. 	<ul style="list-style-type: none"> <u>Bay Area Agencies</u>: Bay Area Biosolids to Energy: RFP currently being developed and is scheduled to be released this summer. A pilot project with Lawrence Livermore National Laboratory is being planned. <u>Southern CA & Central Valley</u>: <u>OCSD</u>: Released hauling bid. <u>Encina Wastewater Authority (EWA)</u>: EWA conducted a pyrolysis trial on PureGreen pellets. The results were very positive. EWA Biosolids Executive team is continuing negotiations with Pharmgrade for a long term partnership/commitment. K-mart retail deal is still dealing with logistics but progress is being made. Mellano Flowers & Co has taken 150,000 lbs of PureGreen this year and is a major supplier for the Rose Parade in Pasadena. EWA initial research trials at the Center for Agricultural & Horticultural Research showed that PureGreen worked extremely well for Roses. <u>IERCF</u>: Facility continues to operate within its permitted capacity. Modifications to material conveyance are currently in design. Construction is anticipated for summer 2012 and completion in 2013. <u>Westlake Farms</u>: Facility is currently in construction with an anticipated startup date in 2013. <u>Terminal Island</u>: The City of Los Angeles approved a Subsequent Negative Declaration for the TIRE biosolids injection project, which addresses project changes. The current project is operating under an existing Underground Injection (UIC) permit, pending approval of a new UIC permit application that was submitted to EPA in Aug 2011. 	B. Jones T. Meregillano M. Bao D. Gilbert B. Gillette	<ul style="list-style-type: none"> Continue to provide regional biosolids management updates. 	

Tri-TAC Land Committee Key Issue Summary

(cont'd)

Item No.	Description	Issues for POTWs	Meeting Notes/Updates	Lead(s)	Next Steps	Due Date
15	Regional Associations Report	<ul style="list-style-type: none"> ▪ Foster partnerships between regional associations by sharing info regarding new issues of concern, lessons learned, project updates, training and educational programs, and public outreach efforts. 	<ul style="list-style-type: none"> ▪ SCAP: Planning next SCAP regional meeting in Encina. ▪ BACWA: Joint meetings held w/Tri-TAC meetings in San Leandro. ▪ CVCWA: Joint meetings held w/Tri-TAC meetings in Sacramento. ▪ CWEA 	M. Bao V. De Lange B. Gillette G. Kester J. Hay		
16	Conferences/Webinars	<ul style="list-style-type: none"> ▪ Stay abreast of upcoming conferences, local seminars, and webinars. 	<ul style="list-style-type: none"> ▪ California Bioresources Alliance Symposium, Sept 18-19, 2013 	All		
Goal: Address Emerging Issues of Concern						
17	Pyrethroids <ul style="list-style-type: none"> ▪ Pyrethroid Working Group (PWG) 	<ul style="list-style-type: none"> ▪ Potential impacts (positive/negative) to existing programs, public perceptions. ▪ May provide opportunities for direct participation in research/studies to address local concerns/issues. 	<ul style="list-style-type: none"> ▪ Survey is progressing along having completed all three phases of sampling. Results will be shared shortly. 	G. Kester	<ul style="list-style-type: none"> ▪ Continue to work with PWG, DPR, U.S. EPA, and others to make the survey possible. Will need to solicit voluntary survey participation from 20 to 30 POTWs. 	
18	Trace Organics Activities <ul style="list-style-type: none"> ▪ Recognized need to fill data gaps to provide U.S. EPA data to conduct credible risk assessment on trace organics that may be present at low concentrations in biosolids. 	<ul style="list-style-type: none"> ▪ Potential impacts (positive/negative) to existing programs, public perceptions. ▪ May provide opportunities for direct participation in research/studies to address local concerns/issues. 	<ul style="list-style-type: none"> ▪ The Phase 2 report is complete and set for release by early summer. Phase 2 examined unpublished data (largely from manufacturers) to help fill data gaps for 62 constituents identified by U.S. EPA as high priority. Data was found for 29 of them. 	G. Kester	<ul style="list-style-type: none"> ▪ Phase 3 will be scoped with an RFP developed by this fall. Will need to solicit funding from across the country, because this phase will involve actual research. 	
19	Climate Change Legislation	<ul style="list-style-type: none"> ▪ Ensure development of strategic approach to climate change issues. 	<ul style="list-style-type: none"> ▪ CWCCG is focused on resolving the pricing structure approach to renewable feed-in-tariffs with the CPUC. An alternative proposal has been submitted (waiting for response from CPUC). 	G. Kester	<ul style="list-style-type: none"> ▪ Meet with the CPUC to discuss the pricing structure approach to feed-in-tariffs. 	
Goal: Maintain Awareness of Key Research Initiatives						
20	Biosolids Research <ul style="list-style-type: none"> ▪ WEF Biogas Study: Create a robust, consensus data set regarding the current and potential production of biogas from anaerobic digestion at WWTPs in the U.S. 	<ul style="list-style-type: none"> ▪ Potential impacts (positive/negative) to existing programs, public perceptions. ▪ May provide opportunities for direct participation in research/studies to address local concerns/issues. 	<ul style="list-style-type: none"> ▪ WEF Biogas Study: Project team has distributed a data survey and is currently incorporating this information into a database. 	G. Kester		