CALIFORNIA
Water Boards

Edmund G. Brown Jr.
Governor

Matthew Rodriguez
Secretary for
Environmental Protection

San Francisco Bay Regional Water Quality Control Board

Sent by email only (achastain@sfwater.org)

September 7, 2018
File CW-256499

City and County of San Francisco
San Francisco Public Utilities Commission / Wastewater Enterprise
Southeast Water Pollution Control Plant
ATTN: Amy Chastain, Regulatory Program Manager, Wastewater
750 Phelps Street
San Francisco, CA 94124

Subject: Comments on *San Francisco Wastewater Long Term Control Plan Synthesis* submitted on March 30, 2018.

Dear Ms. Chastain:

This letter transmits comments on the *San Francisco Wastewater Long Term Control Plan Synthesis* submitted to the Regional Water Board on March 30, 2018, pursuant to NPDES Permit CA0037664, Order No. R2-2013-0029, Provision VI.C.5.c.v, which required SFPUC to synthesize and update its Long-Term Control Plan into one document to reflect current circumstances. While we appreciate SFPUC's efforts to prepare the report for both of its NPDES permits and summarize the historical planning process, the report does not adequately address the minimum required elements. The Regional Water Board anticipates further discussion with you regarding these issues.

Comments

1. Provision VI.C.5.c.v of the Order required SFPUC to synthesize and update its Long-Term Control Plan into one document to reflect current circumstances.

   Comment: Appendix A of the report summarizes documents that comprise SFPUC's Long-Term Control Plan through March 1994, but this does not reflect current circumstances. The Long-Term Control Plan should reflect the findings of the following more recent documents: *Collection System Validation Report* (May 2013); *Westside Operations Summary, Baseline* Report (October 2013; revised March 2014); *Characterization of Westside Wet Weather Discharges and the Efficacy of Combined Sewer Discharge Controls* (2014); and *Bayside System Combined Sewer Operations and Maintenance Plan* (August 2015).

2. Provision VI.C.5.c.v(b) of the Order required SFPUC to set forth operational requirements similar to those listed in Provisions VI.C.5.c.iii and VI.C.5.c.iv of the Order to optimize system operations so as to maximize pollutant removal during wet weather and minimize combined sewer discharges.

   Comment: SFPUC did not set forth any new operational requirements, nor did it confirm that the existing requirements are still appropriate. Therefore, we cannot determine whether the requirements in the Order need to be updated during the next permit reissuance.

3. Provision VI.C.5.c.v(c) of the Order required SFPUC to set forth additional measures, to the extent technically and economically feasible, to maximize pollutant removal and minimize combined sewer discharges (e.g., implementing and promoting green infrastructure and low impact development that enhances stormwater detention and percolation).

   Comment: SFPUC did not set forth additional measures. Instead, the report summarizes planning efforts that began in 2012, lists projects that are completed or continue to be investigated, and refers to the *Bayside Sensitive Areas Report* (March 30, 2018). This does not comply with the requirement.

4. Provision VI.C.5.c.v(d) of the Order required SFPUC to develop and propose a metric to evaluate the performance of its wet weather disinfection systems for Discharge Point Nos. 001 through 006.

   Comment: SFPUC did not develop or propose any metrics to evaluate the performance of its wet weather disinfection systems for Discharge Point Nos. 001 through 006. We assume, therefore, that SFPUC accepts enterococcus measurement as a reasonable performance metric, as established through Table 5 of the Order.

5. Provision VI.C.5.c.v(e) of the Order required SFPUC to propose a plan for post-construction compliance monitoring of all wet weather discharges consistent with the *Combined Sewer Overflow Control Policy*.

   Comment: SFPUC proposed to continue the current monitoring program "with modifications to be discussed with the Regional Water Board during the permit re-issuance processes for the Westside and Bayside Permits." This response does not comply with the requirement.

If you have any questions regarding this matter, contact Jessica Watkins at (510) 622-2349 or jessica.watkins@waterboards.ca.gov.

Sincerely,

Bill Johnson

Bill Johnson
Chief, NPDES Wastewater and
Enforcement Division

Copy (sent by email): Ken Greenberg, greenberg.ken@epamail.epa.gov, U.S. EPA, Region 9