



September 21, 2018

Mr. Bill Johnson
 Chief, NPDES Wastewater and Enforcement Division
 California Regional Water Quality Control Board
 San Francisco Bay Region
 1515 Clay Street, Suite 1400
 Oakland, CA 94612

SUBJECT: SFRWQCB Comments on San Francisco Wastewater Long Term Control Plan Synthesis & Update

Dear Mr. Johnson:

The San Francisco Public Utilities Commission (SFPUC) has received and reviewed the San Francisco Regional Water Quality Control Board's (Regional Water Board) September 7, 2018 comments on the SFPUC's March 30, 2018 submittal of a *Long Term Control Plan Synthesis and Update* (LTCP Synthesis) as required by section VI.C.5.c.v of the Southeast Water Pollution Control Plant, North Point Wet Weather Facility and Bayside Wet Weather Facilities permit, NPDES No. CA0037664 (SEP Permit).

The SFPUC LTCP Synthesis submittal to the Regional Water Board addresses the required elements specified in the SEP Permit. A description of the bases for this position is further summarized in an attachment to this letter. We offer this as preliminary information on the SFPUC's perspective to assist in preparing for a discussion on next steps to address any Regional Water Board outstanding concerns.

This is the first time, since completing construction of the transport/storage box system in the 1990s, that the Regional Water Board has requested a report of this nature. The permit provision requiring submittal of the LTCP Synthesis is unique to the SEP Permit, and, to SFPUC's knowledge is not specifically described in the United States Environmental Protection Agency's *Combined Sewer Overflows Guidance for Permit Writers* (EPA 832-B-95-008). Considering this, and the relatively general nature of the permit terms, it is not unexpected that the Regional Water Board may have had a different understanding about the scope of the submission. We welcome the prospect of cooperatively working with the Regional Water Board to ensure that our expectations are aligned going forward.

We understand that the Regional Water Board intends to reissue the NPDES permit for the Oceanside Water Pollution Control Plant (OSP) soon, and intends that the permit include requirements relating to Long Term Control Plans. In advance of the permit reissuance, we are particularly interested in ensuring that we have a mutual

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understanding of the intent of the original SEP permit requirement for the LTCP Synthesis, and that any outstanding questions regarding the March 30, 2018 submittal are resolved consistent with the permit terms. Undertaking this effort will assist in avoiding future miscommunications and support an efficient discussion of LTCP-related permit terms during the OSP permitting process.

We look forward to meeting with you and your staff to ensure all concerns are addressed in advance of the planned upcoming permit actions, and ask that you provide some specific dates for us to meet and discuss a pathway to move forward.

Sincerely,

A handwritten signature in blue ink that reads "Amy Chastain". The signature is written in a cursive style with a large initial "A".

Amy Chastain, Regulatory Manager
Wastewater Enterprise
San Francisco Public Utilities Commission

cc: Greg Norby, Assistant General Manager, SFPUC
Jessica Watkins, Water Resource Control Engineer, Regional Water Board

Attachment

SFPUC Preliminary Response to Regional Water Board Comments on LTCP Synthesis

Comment 1:

Regional Board 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).

SFPUC Response: As understood by the SFPUC in preparing the LTCP Synthesis, a Long-Term Control Plan is generally contemplated by the applicable regulations and guidance to provide for the design and construction of improvements to control combined sewer overflows (CSOs). The documents summarized in the SFPUC's LTCP Synthesis represent those documents that comprise the Long-Term Control Plan that was implemented to achieve the current level of system performance by the SFPUC. These are the documents that the SFPUC concluded were relevant to complying with the permit terms for preparation of the LTCP Synthesis. In contrast, the documents listed in the Regional Water Board's comments are outside of the scope of the existing, implemented LTCP, i.e., they do not reflect the design and construction of improvements as implemented by SFPUC to address CSOs. All of the documents cited by the Regional Water Board, except for the *Collection System Validation Report*, describe operational aspects of the combined sewer system that resulted from implementation of the LTCP. In preparing its report, the SFPUC concluded that such documents, which also reflect current conditions related to wet weather discharge controls, relate to operation and monitoring of the existing system but are not part of the LTCP itself (as constructed through the 1990s). The *Collection System Validation Report* was the result of a conceptual planning exercise "to provide a potential roadmap for achieving cost-effective higher levels of CSD control...should the SFPUC decide that it is in the public interest to do so." As an internal planning report, prepared to inform early stages of capital planning for future possible improvements, the *Collection System Validation Report* is not part of the LTCP as implemented and cannot be construed as a comprehensive analysis of wet weather control options or a commitment to implement those select options addressed in the report.

Comment 2:

Regional Board 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 requirements in the Order need to be updated during the next permit reissuance.

SFPUC Response: The submittal describes the analyses performed by the SFPUC to determine whether modifying operation of the existing system could increase

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treatment of wet weather flows. The analyses determined that the system, as currently operated, is highly optimized. The SFPUC did identify one opportunity to marginally increase treatment of wet weather flows through increased use of storage in the Sunnydale portion of the system. Apart from this potential operational change, the SFPUC found that the existing requirements are still appropriate.

Comment 3:

Regional Board 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.

SFPUC Response: SFPUC does not understand the basis for the Regional Water Board's position on this issue. The requirement to describe additional measures must be read in the context that the permit confirms that the LTCP "shall continue to reflect the historical long-term average annual design goals for combined sewer discharges" and the specific examples listed in the permit "e.g., implementing and promoting green infrastructure and low impact development that enhances stormwater detention and percolation" The LTCP Synthesis, in fact, described additional measures – in the form of completed and planned grey and green infrastructure – that could provide additional wet weather control.

Comment 4:

Regional Board 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.

SFPUC Response: This requirement was included in the permit at the request of the SFPUC. The SFPUC's intent was to facilitate an evaluation of opportunities to reduce the use of disinfection chemicals, not to evaluate the replacement of enterococcus as a performance metric. The SFPUC, like many agencies in the Bay area, relies on the use of sodium bisulfite to achieve compliance with its total residual chlorine effluent limitation. The evaluation was intended to explore whether lower levels of sodium bisulfite could be used during wet weather, while still ensuring attainment of existing requirements related to chlorine residual concentrations. The SFPUC believes that the issues intended to be addressed by this permit term were included in the LTCP Synthesis.

Comment 5:

Regional Board Comment: SFPUC proposed to continue the current monitoring program "with modifications to be discussed with the Regional Water Board

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during the permit re-issuance processes for the Westside and Bayside Permits.”
This response does not comply with the requirement.

SFPUC Response: The SFPUC proposed continuing the existing monitoring program currently described in the SEP Permit. The SFPUC believes that this conclusion is technically justified and is consistent with the requirement specified in the permit. The offer to discuss modifications was made by the SFPUC in the interests of cooperating with the Regional Water Board due to the recognition that the Regional Water Board may see the need for changes to the existing monitoring program.