

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 85-19  
NPDES NO. CA0037834

REISSUING WASTE DISCHARGE REQUIREMENTS FOR:

CITY OF PALO ALTO  
SUBREGIONAL WATER QUALITY CONTROL PLANT  
PALO ALTO  
SANTA CLARA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter called the Board) finds that:

1. The City of Palo Alto (hereinafter discharger) by application dated October 2, 1984 has applied for reissuance and amendment of waste discharge requirements under the National Pollutant Discharge Elimination System, NPDES Permit No. CA0037834.
2. The discharger presently discharges dry weather (1983) flow of 27.8 million gallons per day (mgd) from its advanced secondary treatment facility at 2501 Embarcadero Way, Palo Alto. Treatment facilities consist of barminutor screens, gravity sedimentation with skimming of floatables, treatment over a fixed film reactor, nitrification in activated sludge aeration basins, dual media filtration, disinfection by chlorination and dechlorination with sulfur dioxide. Sludge disposal consists of combined gravity thickening of primary and secondary sludges, followed by dewatering by centrifuge, multihearth incineration and metals recovery in a smelter off-site. Plans are underway to replace the centrifuges with belt filter presses. The facility has a current dry weather design capacity of 30.6 mgd. This facility treats domestic and industrial wastewater from the Cities of Palo Alto, Mountain View, Los Altos, Los Altos Hills, Stanford University, and East Palo Alto Sanitary District. The treated wastewater is discharged from the treatment plant to an unnamed slough (37deg 27min 11sec N latitude and 122deg 06min 36sec W longitude) into waters of South San Francisco Bay and its tributaries south of Dumbarton Bridge, all waters of the United States.

The discharger submitted an amended NPDES Permit dated December 21, 1984 providing a time schedule and technical report, "Water Quality Control Plant Capacity Study", dated May 1983 and updated March 8, 1984, to increase dry weather capacity to 38.0 mgd by January 1, 1988 to assure adequate capacity and consistent compliance with waste discharge requirements through 1995. The project plan and time schedule are satisfactory.

3. This discharge is presently governed by Waste Discharge Requirements Nos. (NPDES Permit) 79-164 and Time Schedule Order Nos. 81-13. This Order amends and reissues Waste Discharge Requirements; amended Time Schedule Order amendments are found in Order No. 85-20.

4. The Regional Board adopted a revised Water Quality Control Plan for San Francisco Bay Region (Basin Plan) on July 21, 1982. The Basin Plan contains water quality objectives for South San Francisco Bay and contiguous waters.
5. The beneficial uses of South San Francisco Bay and contiguous water bodies are:
  - o Water contact recreation
  - o Non-contact water recreation
  - o Wildlife Habitat
  - o Preservation of Rare and Endangered Species
  - o Estuarine and Cold Fresh Water Habitat
  - o Fish migration and spawning
  - o Industrial service and process supply
  - o Shellfish harvesting
  - o Navigation
  - o Commercial and Sport Fishing
6. The current discharge location is prohibited under the Basin Plan due to its location south of the Dumbarton Bridge, lack of 10 to 1 initial dilution and discharge to a dead-end slough. Public access to the actual discharge location is limited. The discharger is a member of the South Bay Dischargers Authority which is currently undergoing a Board ordered study to establish supporting data to request Board consideration to allow continuous discharge in the existing location under Basin Plan exception criteria. Time Schedule Order No. 85-20 adopted by the Board allows for the study and delay in implementing the Basin Plan Prohibitions. Additionally, the discharger must comply with Board Resolution No. 84-11 requiring compliance with this Permit's prohibitions by July 1, 1988 under the EPA's Municipal Compliance Policy and the States' NPDES Compliance Policy. Time Schedule Order No. 85-20 also includes the Municipal Compliance Plan time schedule.
7. An Operations and Maintenance Manual is maintained by the discharger for purposes of providing plant and regulatory personnel with a source of information describing all equipment, facilities, and recommended operating strategies, process control monitoring, and maintenance activities necessary to assure consistent compliance and/or minimize non-compliance and upsets. In order to remain a useful and relevant document, this manual should be kept updated to reflect significant changes in plant facilities or activities.
8. The discharger has an EPA approved Local Pretreatment Program for source control and application of pretreatment standards.
9. This Order serves as an NPDES Permit, reissuance of which is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.
10. The discharger and interested agencies and persons have been notified of the Board's intent to reissue requirements for the existing and proposed discharges and have been provided with the opportunity for a public

hearing and the opportunity to submit their written views and recommendations.

11. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that the discharger in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder and the provisions of the Clean Water Act as amended and regulations and guidelines adopted thereunder shall comply with the following:

A. Discharge Prohibitions:

1. Discharge of waste to waters of San Francisco Bay south of Dumbarton Bridge or tributaries thereto is prohibited.
2. Discharge of waste not receiving initial dilution of at least 10 to 1 is prohibited.
3. Discharge of waste to dead-end sloughs or confined waterways is prohibited.
4. There shall be no bypass or overflow of untreated wastewater to waters of the state at the treatment plant or from the collection system under the control of the discharger.
5. The average dry weather flow shall not exceed 30.6 mgd. Average shall be determined over any continuous three-month period during the dry weather months. This capacity may be increased to 38 mgd with the completion of the Phase I facilities shown on Table 7-6 of the technical report titled "Water Quality Control Plant Capacity Study" as described in Finding 2. This capacity increase shall become effective only upon submission of documentation satisfactory to the Executive Officer certifying reliable, and satisfactory operations and capacity.

B. Effluent Limitations:

1. The discharge of an effluent containing constituents in excess of the following limits is prohibited:

<u>Constituent</u>	<u>Units</u>	<u>Monthly Average</u>	<u>7-Day Average</u>	<u>Maximum Daily</u>	<u>Instantaneous Maximum</u>
a. BOD	mg/l	10	-	20	-
b. Suspended Solids	mg/l	10	-	20	-
c. Oil & Grease	mg/l	5	-	10	-
d. Settleable Matter	ml/l-hr	0.1	-	-	0.2
e. Turbidity	NTU	-	-	-	10
f. Chlorine Residual	mg/l	-	-	-	0.0

2. The discharge shall not have a pH of less than 6.5 nor greater than 8.5.

3. The survival of test organisms acceptable to the Executive Officer in 96-hour bioassays of the effluent shall achieve a median of 90% survival for three consecutive samples and a 90% percentile value of not less than 70% survival based on the ten most recent consecutive samples.

4. Representative samples of the effluent shall not exceed the following limits for the measurement period indicated [a]:

<u>Constituent</u>	<u>Unit of Measurement</u>	<u>6 month median</u>	<u>Daily maximum</u>
Arsenic	mg/l	0.01	0.02
Cadmium	mg/l	0.02	0.03
Total Chromium	mg/l	0.01	0.02
Copper	mg/l	0.2	0.3
Lead	mg/l	0.1	0.2
Mercury	mg/l	0.001	0.002
Nickel	mg/l	0.1	0.2
Silver	mg/l	0.02	0.04
Zinc	mg/l	0.3	0.5
Cyanide	mg/l	0.1	0.2
Phenolic Compounds	mg/l	0.5	1.0
Total Identifiable Chlorinated Hydrocarbons [b]	mg/l	0.002	0.004

Notes for Effluent Limitation B.5.:

[a.] These limits are intended to be achieved through secondary treatment, source control and application of pretreatment standards.

[b.] Total Identifiable Chlorinated Hydrocarbons shall be measured by summing the individual concentrations of DDT, DDD, DDE, aldrin, BHC, chlordane, endrin, heptachlor, lindane, dieldrin, polychlorinated biphenyls, and other identifiable chlorinated hydrocarbons.

5. The arithmetic mean of values for BOD and Suspended Solids in effluent samples collected in a period of 30 consecutive days shall not exceed 15 percent of the arithmetic mean of respective values for influent samples collected at approximately the same times during the same period (i.e. 85 percent removal).

6. At some point in the treatment process, the waste shall not exceed a median MPN for Total Coliform Organisms of 23/100ml nor a maximum of 240/100ml, as determined from the results of the previous consecutive five (5) days for which analysis have been completed.

C. Receiving Water Limitations:

1. The discharge of waste shall not cause the following conditions to exist in waters of the state at any place:

a. Floating, suspended, or deposited macroscopic particulate matter, or foam;

b. Bottom deposits or aquatic growths;



1. The requirements prescribed by this Order supersede the requirements prescribed by Order No. 79-164. Order No. 79-164 is hereby rescinded.
2. Where effluent concentration limits in mg/l are contained in this permit, the following mass emission limitations shall also apply as follows:

Mass Emission Limit in (lbs/day), (kg/day) = Concentration limit in mg/l x (8.34), (3.79) x Actual Flow in mgd averaged over the time interval to which the limit applies.

3. The discharger shall comply with all sections of this Order immediately upon adoption except as stipulated in Time Schedule Order No. 85-20 and the compliance time schedule as shown below to assure adequate capacity and consistent compliance (reference Finding 2. and Discharge Prohibition A.5):

<u>Task</u>	<u>Date Due</u>
a. Document preliminary plan completion	July 1, 1985
b. Document final plan completion	May 1, 1986
c. Document complete financing and award of construction contract.	July 1, 1986
d. Document commencement of construction	August 1, 1986
e. Provide updated report on available capacity and forecasted connections.	October 1, 1986 October 1, 1987
f. Provide construction status reports	January 1, 1987 July 1, 1987 October 1, 1987
g. Document completion of construction and operational level attained and submit updated Operations and Maintenance Manual.	January 1, 1988

The discharger shall submit to the Board, on or before each compliance report date, a report detailing his compliance or noncompliance with the specific schedule date and task. If noncompliance is being reported, the reasons for such noncompliance shall be stated, the efforts taken to meet compliance, plus an estimate of the date when the discharger will be in compliance. The discharger shall notify the Board by letter when he has returned to compliance with the time schedule.

4. The discharger shall review and update his Operations and Maintenance Manual annually, or in the event of significant facility or process changes, shortly after such changes have occurred. Annual revisions, or letters stating than no changes are needed shall be submitted to

the Regional Board by April 15 of each year beginning 1986. A time schedule for completion of the initial revision shall be submitted by July 1, 1985. Documentation of operator input and review shall accompany each annual update.

5. The discharger shall review and update by July 1, 1985 and annually thereafter its contingency plan as required by Board Resolution No. 74-10. The discharge of pollutants in violation of this Order where the discharger has failed to develop and/or implement a contingency plan will be basis for considering such discharge a willful and negligent violation of this Order pursuant to Section 13387 of the California Water Code.
6. The discharger shall implement its approved industrial Pretreatment Program in accordance with legal authorities, policies, and procedures described in its pretreatment document and in accordance with the federal Clean Water Act, Section 402(b)(8) and (9) and federal pretreatment regulations in 40 CFR 403.
  - a. The permittee shall maintain an adequate revenue program and enforce prohibitions of any applicable National Pretreatment Standards established by the U.S. Environmental Protection Agency (EPA).
  - b. The discharger shall comply with the requirements titled "Pretreatment of Industrial Wastewater" (Attached) and "Requirements for Pretreatment Annual Report" (Attached) and shall be subject to enforcement actions, penalties, fines and other remedies as provided for therein and by California law. The sampling and monitoring requirements may be modified upon request of the discharger and written approval of the Executive Officer.
7. The discharger shall comply with the attached self-monitoring program as adopted by the Board and as may be amended by the Executive Officer.

The Regional Board through the Aquatic Habitat Program, is currently evaluating appropriate bioassay methods for wastewater dischargers within San Francisco Bay. Once methods have been recommended for use in a regulatory monitoring program and approved by the Board, the self-monitoring program may be modified to implement appropriate bioassay methods.

The U.S. Environmental Protection Agency has developed a policy for the Development of Water Quality Based Permit Limitations for Toxic Pollutants. This permit may be modified or reissued to implement this policy.

8. The discharger shall comply with all items of the attached "Standard Provisions, Reporting Requirements and Definitions" dated April 1977 with the exception of Provision A.12. and Reporting Requirements B.2. and B.3.

Item C.2. of the Standard Provisions shall be amended to read as

follows:

"The 30 day (monthly) average discharge is the total discharge by weight during a 30 consecutive day (month) period, respectively, divided by the number of days in the period that the facility was discharging. Where less than daily sampling is required by this permit, the 30-day (month) average discharge shall be determined by the summation of all the measured discharges by weight divided by the number of days during the 30 consecutive calendar day period (month) when the measurements were made. For other than 30-day (month) periods, compliance shall be based upon the average of all measurements made during the specified period."

9. This Order expires February 20, 1990. The discharger must file a report of waste discharge in accordance with Title 23, Chapter 3, Subchapter 9 of the California Administrative Code not later than 180 days in advance of such expiration date as application for issuance of new waste discharge requirements.
10. This Order shall serve as a National Pollutant Discharge Elimination System Permit pursuant to Section 402 of the Clean Water Act or amendments thereto, and shall become effective 10 days after date of its adoption provided the Regional Administrator, Environmental Protection Agency, has no objection. If the Regional Administrator objects to its issuance, the permit shall not become effective until such objection is withdrawn.

I, Roger B. James, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region on February 20, 1985.

ROGER B. JAMES  
Executive Officer

Attachments:

Standard Provisions & Reporting Requirements, April 1977  
Self-Monitoring Program  
Resolution No. 74-10  
Pretreatment of Industrial Wastewater  
Requirements for Pretreatment Annual Report

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

AMENDED  
AND  
REISSUED

SELF-MONITORING PROGRAM

FOR

CITY OF PALO ALTO  
REGIONAL WATER QUALITY CONTROL PLANT  
PALO ALTO  
SANTA CLARA COUNTY

NPDES NO. CA 0037834  
ORDER NO. 85-19

CONSISTS OF

PART A  
(dated January 1978)

AND

PART B

Ordered 12/19/79,  
Revised 11/23/82,  
Reissued 2/20/85

PART B

I. DESCRIPTION OF SAMPLING STATIONS

A. INFLUENT AND INTAKE

<u>Station</u>	<u>Description</u>
A-001	At any point in the treatment facilities headworks at which all waste tributary to the system is present and preceding any treatment.

B. EFFLUENT

<u>Station</u>	<u>Description</u>
E-001	At any point in the outfall from the treatment facilities between the point of discharge and the point at which all waste tributary to that outfall is present. (May be the same as E-001-D).
E-001-D	At any point in the disinfection facilities for Waste E-001 at which point adequate contact with the disinfectant is assured.

C. RECEIVING WATERS

<u>Station</u>	<u>Description</u>
C-1	At a point, in the unnamed slough, located 50 feet from the point of discharge.
C-2	At a point in the unnamed slough, located within 1,000 feet from the point of discharge.
C-3	At a point near the center of the discharge channel just bayward from the PG&E power lines (formerly C-4).
C-R	At a point in Mayfield Slough between the public boat launching ramp and the confluence of Mayfield and Charleston Slough.

Offshore Stations

Offshore samples shall be taken along radial lines extending from Station C-3 as shown on attached map (Drawing No. 2) and as described below:

Line D-1 extends due east from C-3.

Line D-2 extends northeast by east from C-3.

Line D-3 extends northeast from C-3.

Line D-4 extends northeast by north from C-3.

Line D-5 extends due north from C-3.

Line D-6 extends northwest by north from C-3.

Stations shall be designated at 1,000 feet intervals along these radii as follows:

D-X-1	1,000 feet from C-3 along line D-X.
D-X-2	2,000 feet from C-3 along line D-X
D-X-3	3,000 feet from C-3 along line D-X
etc....	

D. LAND OBSERVATIONS

<u>Station</u>	<u>Description</u>
P-1 thru P-'n'	Located at the corners and midpoints of the perimeter fence line surrounding the treatment facilities. (A sketch showing the locations of these stations will accompany each report).

E. GROUNDWATER OBSERVATIONS

<u>Station</u>	<u>Description</u>
G-1 thru G-'n'	Future groundwater monitoring wells to be specified by the Executive Officer to monitor Land Disposal Site for sewage sludge.

E. OVERFLOWS AND BYPASSES

<u>Station</u>	<u>Description</u>
OV-1 thru OV-'n'	Bypass or overflows from manholes, pump stations or collection system.

II. SCHEDULE OF SAMPLING AND ANALYSIS

The schedule of sampling and analysis shall be that given as Table I.

III. MODIFICATION OF PART A, DATED JANUARY 1976:

Not applicable paragraphs of Part A: C.1, C.3, C.4

I, Roger B. James, Executive Officer, hereby certify that the following Self-Monitoring Program:

1. Has been developed in accordance with the procedures set forth in this Regional Board's Resolution No. 7316 in order to obtain data and document compliance with waste discharge requirements established in Regional Board Order No. 85-19.
2. Has been amended and ordered by the Regional Board on February 20, 1985.
3. May be reviewed at any time subsequent to the adoption date above upon written notice from the Executive Officer or upon consideration of a request by the discharger; revisions may be ordered by the Executive Officer.

ROGER B. JAMES  
Executive Officer

Attachments:

- Table I with notes
- Receiving Water Sampling Location Map.

**TABLE I**  
**SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSIS (1,7,10)**  
 CITY OF PALO ALTO

Sampling Station	A-001	E-001 (7)		E-001 -D(7)	C (13)	P	OV
TYPE OF SAMPLE	C-24	(4) G	C-24	Cont G	G	O	O
Flow Rate (mgd)				D			
BOD, 5-day, 20° C, or COD (mg/l & kg/day) (1,5)	3/W		3/W				
Chlorine Residual & Dosage (mg/l & kg/day) (1,8)		2H	or cont.				
Settleable Matter (ml/1-hr. & cu. ft./day) (1)		D					
Total Suspended Matter (mg/l & kg/day) (1,3)	3/W		3/W				
Oil & Grease (mg/l & kg/day) (1,2)		M					
Coliform (Total or Fecal) (MPN/100 ml) per req't (1)				3/W	2/M		
Fish Toxicity, 96-hr. <del>LD50</del> % Survival in undiluted waste (5,6)			M				
Ammonia Nitrogen (mg/l & kg/day)			W(9)		2/M		
Nitrate Nitrogen (mg/l & kg/day)			2W(9)		3M		
Nitrite Nitrogen (mg/l & kg/day)			2W(9)		3M		
Total Organic Nitrogen (mg/l & kg/day)			2W(9)		3M		
Total Phosphate (mg/l & kg/day)			2W(9)		3M		
Turbidity (Nephelometric Jackson Turbidity Units)			W		2/M		
pH (units)		D			2/M		
Dissolved Oxygen (mg/l and % Saturation)		D			2/M		
Temperature (°C)		D			2/M		
Apparent Color (color units)			W		2/M		
Secchi Disc (inches)					2/M		
Sulfides (if DO < 5.0 mg/l) Total & Dissolved (mg/l)		D			2/M		
Arsenic (mg/l & kg/day)			Q(12)				
Cadmium (mg/l & kg/day)			Q(12)				
Chromium, Total (mg/l & kg/day)			Q(12)				
Copper (mg/l & kg/day)			Q(12)				
Cyanide (mg/l & kg/day)			Q(12)				
Silver (mg/l & kg/day)			Q(12)				
Lead (mg/l & kg/day)			Q(12)				

**TABLE I (continued)**  
**SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSIS (1,7,10)**  
 CITY OF PALO ALTO WQCP (CONT.)

Sampling Station	A-001	E-001 (7)	E-001 D (7)	C (13)	P	OV
TYPE OF SAMPLE	C-24	Q(4) C-24	Cont Q(4)	G	O	O
Mercury (mg/l & kg/day)		Q(12)				
Nickel (mg/l & kg/day)		Q(12)				
Zinc (mg/l & kg/day)		Q(12)				
PHENOLIC COMPOUNDS (mg/l & kg/day)		Q(11)				
All Applicable Standard Observations		D		2/M	2/W	E
Bottom Sediment Analyses and Observations						
Total Identifiable Chlorinated Hydrocarbons (mg/l & kg/day)		Q(11)				
Non-dissociated Ammonium Hydroxide as N (mg/l)				2/M		
Organic & Metallic Pollutant (see letter 5/9/84)	Y	Q(12)				

LEGEND FOR TABLE

TYPES OF SAMPLES

- G = grab sample
- C-24 = composite sample - 24-hour
- C-X = composite sample - X hours  
(used when discharge does not continue for 24-hour period)
- Cont = continuous sampling
- DI = depth-integrated sample
- BS = bottom sediment sample
- O = observation

TYPES OF STATIONS

- I = intake and/or water supply stations
- A = treatment facility influent stations
- E = waste effluent stations
- C = receiving water stations
- P = treatment facilities perimeter stations
- L = basin and/or pond levee stations
- B = bottom sediment stations
- G = groundwater stations

FREQUENCY OF SAMPLING

- E = each occurrence
- H = once each hour
- D = once each day
- W = once each week
- M = once each month
- Y = once each year
- 2/H = twice per hour
- 2/W = 2 days per week
- 5/W = 5 days per week
- 2/M = 2 days per month
- 2/Y = once in March and once in September
- Q = quarterly, once in March, June, Sept. and December
- 2H = every 2 hours
- 2D = every 2 days
- 2W = every 2 weeks
- 3M = every 3 months
- Cont = continuous

NOTES FOR TABLE I:

- 1/ During any day when bypassing occurs from any treatment unit(s) in the WPCP, the monitoring program for the effluent shall include the following in addition to the above schedule for sampling, measurement and analyses.
  - a. Composite sample for BOD and Total Suspended Solids.
  - b. Grab samples for Total Coliform, Settleable Matter and Oil and Grease.
  - c. Continuous monitoring of flow.
  - d. Continuous or every hour monitoring of chlorine residual.

During periods of wet weather flows exceeding 45 mgd the above requirement is waived, however normal scheduled effluent monitoring is required.

- 2/ Oil and Grease sampling shall consist of a grab sample. In the event that sampling for oil and grease every two weeks or less frequency shows an apparent violation of the waste discharge permit, 30-day average limitation (considering the results of on or two day's sampling as a 30-day average), then the sampling frequency shall be increased to weekly so that a true 30-day average can be computed and compliance can be determined.
- 3/ Percent removal (effluent vs. influent) shall also be reported.
- 4/ Grab samples shall be taken on day(s) of composite sampling.
- 5/ Sample date for bioassay and for one of all other specified parameters shall coincide with composite sample(s).
- 6/ If a continuous bioassay is to be run, sample may be from E-001 prior to disinfection instead of dechlorinating E-001-D effluent.
- 7/ If any effluent sample is in violation of limits, sampling shall be increased for that parameter to at least daily or greater until compliance is demonstrated in two successive samples. Receiving water violations shall be reported in the monthly report; increased receiving water monitoring may be required.
- 8/ Data shall be reported using forms provided by the Board or an approved equivalent; chlorine residual analyzers shall be calibrated against grab samples as frequently as necessary to maintain accurate control and reliable operation. If an effluent violation is detected, grab samples shall be taken every 30 minutes until compliance is achieved.
- 9/ These parameters shall be tested for on the same composite sample used for the bioassay.
- 10/ All flow other than to the outfall (e.g. sludge, etc.) shall also be reported monthly. Daily records shall be kept of the quantity (cu. yds. or cu. ft.) and solids content (%) of dewatered sludge disposed of and the location of disposal. Modifications of this requirement may be considered with the prior approval of the Executive Officer.
- 11/ One sample quarterly consisting of a 24 hour composite.

- 12/ One sample quarterly consisting of a 30-day composite.
- 13/ Collect grab sample at each station C-1 through C-R on an outgoing tide. If the dissolved oxygen content of any sample taken as above at stations C-3, is below 5.0 mg/l grab sample shall be taken as soon as possible along each of two radial lines most nearly approximating the direction of current flow until dissolved oxygen of or exceeding 5.0 mg/l is found at two successive stations along each radius. All samples shall be taken when the water depth is at least one and one-half feet at the respective station, and in no case shall sampling be required beyond 10,000 feet from station C-3. (See Drawing No. 2 - "O" Stations).

SAN FRANCISCO BAY

SCALE: 1"=600'

PALO ALTO AIRPORT

UNNAMED SLOUGH

POWER LINES

LAKE

DIKE

DUCK POND

PUBLIC BOAT LAUNCHING RAMP

YACHT HARBOR

OLD DISCHARGE POINT (ABANDONED)

MAYFIELD SLOUGH

CHARLESTON SLOUGH

30" CMP

SEWAGE TREATMENT PLANT

REGIONAL WATER QUALITY CONTROL PLANT  
CITY OF PALO ALTO  
RECEIVING WATER MONITORING STATIONS

LEGEND



RECEIVING WATER MONITORING STATION



MARSHLAND

