

STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Anna Gallagher)  
MEETING DATE: June 10, 2020

ITEM: **5B**

SUBJECT: **U.S. Department of Navy, Treasure Island Wastewater Treatment Plant and Wastewater Collection System, San Francisco, San Francisco County – Reissuance of NPDES Permit**

CHRONOLOGY: January 2015 – NPDES Permit reissued

DISCUSSION: This Revised Tentative Order (Appendix A) would reissue the NPDES permit for the Treasure Island Wastewater Treatment Plant, which serves approximately 2,500 people on Treasure Island and Yerba Buena Island in San Francisco. The plant provides secondary treatment for approximately 0.34 million gallons per day of wastewater for discharge through a deep-water outfall to Central San Francisco Bay.

The plant is owned by the U.S. Navy, which has designated the Treasure Island Development Authority (TIDA) as its contract operator. TIDA delegates operation and maintenance of the plant and its collection system to the San Francisco Public Utilities Commission pursuant to a Memorandum of Understanding that is subject to renewal annually.

As part of a comprehensive redevelopment of Treasure Island, the U.S. Navy is in the process of incrementally transferring ownership of the plant and its collection system to TIDA. The transfer is expected to be complete by 2022.

During the coming permit term, San Francisco plans to construct a new wastewater treatment plant (the Treasure Island Water Resource Recovery Facility) to replace the existing plant. San Francisco will own, operate, and maintain the new plant, which it expects to complete in 2024. TIDA plans to decommission the existing plant when the new plant becomes operational.

TIDA also plans to rehabilitate or replace the entire collection system in phases as it redevelops the island. These upgrades began in 2018 and will continue over the next 15 to 20 years. When TIDA completes the upgrades, it will transfer ownership of the entire collection system to San Francisco.

The new Treasure Island Water Resource Recovery Facility will be located adjacent to the existing plant and will provide tertiary treatment of wastewater from Treasure Island and Yerba Buena Island. Once the Island redevelopment is complete, the plant is expected to serve 8,000 homes and various new commercial facilities. It will be designed to treat an average dry weather flow of 1.3 million gallons per day and a peak wet weather flow of 3.9 million gallons per day. The new plant will distribute approximately 0.43 million gallons per day of tertiary-treated effluent to its service area for reuse in landscape irrigation, urban farming, and dual plumbing. Effluent in excess of recycled water demands will be pumped to a constructed wetland adjacent to

the new plant for polishing treatment. After wetland treatment, the effluent will be discharged through a new shallow-water outfall to Central San Francisco Bay.

The Revised Tentative Order proposes more stringent technology-based and water quality-based effluent limitations for the Treasure Island Water Resource Recovery Facility than for the existing plant. These changes reflect the new plant's higher level of treatment and its discharge location, which will receive less initial dilution than the existing outfall provides.

San Francisco and the U.S. Navy submitted comments (Appendix B) on a draft order distributed for review. We prepared a response to those comments (Appendix C) that explain changes reflected in the Revised Tentative Order. We revised the order to clarify details about monitoring requirements, facility operations, and expected ownership transfers. We also clarified that neither Discharge Prohibition III.A nor III.E authorizes discharges to waters of the State. Finally, we made editorial changes in Fact Sheet section VIII.C (Public Participation) to reflect that the public hearing was held virtually.

We disagreed with certain comments. In particular, San Francisco objected to receiving water limitations in the tentative order that prohibit discharges causing violations of water quality standards, or creating pollution, contamination, or nuisance. San Francisco is concerned that these requirements create uncertainty for the discharger as to whether it is complying with the permit.

As explained in the Response to Comments, we disagree. The receiving water limitations are consistent with the Clean Water Act, NPDES regulations, State water quality standards, and State law, and they serve as backstops in the event that the effluent limitations and other permit provisions prove to be inadequate. The same receiving water limitations appear in nearly all NPDES permits in the Region, including San Francisco's NPDES permits.

RECOMMEN-  
DATION: Adoption of the Revised Tentative Order

FILE: CW-266328

APPENDICES: A. Revised Tentative Order  
B. Comments  
C. Response to Comments

# Appendix A

## Revised Tentative Order

# Appendix B

## Comments

In accordance with Section 11546.7 of the California Government Code, an electronic version of the comments received have not been posted online as they do not meet specified accessibility standards. For an electronic copy of the comments, please see the contact information provided in Fact Sheet section VIII.G of the revised tentative order.

Appendix C  
Response to Comments