

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

STAFF SUMMARY REPORT: James Parrish  
MEETING DATE: February 9, 2022

**ITEM: 7**

**City of San Leandro, City of San Leandro Water Pollution Control Plant – Treatment Wetland, San Leandro, Alameda County – Issuance of NPDES Permit**

**DISCUSSION:**

This Tentative Order (Appendix A) would issue a new NPDES permit for the City of San Leandro to operate a wastewater treatment wetland and discharge through a shallow-water outfall to Lower San Francisco Bay. The City is a member of the East Bay Dischargers Authority (EBDA), a joint powers agency consisting of multiple member wastewater treatment agencies. It currently collects domestic, commercial, and industrial wastewater from a portion of the City and treats it to secondary treatment standards at the City of San Leandro Water Pollution Control Plant before discharging through the EBDA Common Outfall, a deepwater outfall to Lower San Francisco Bay. To demonstrate the feasibility of implementing nature-based solutions for building shoreline resiliency, creating habitat, and improving water quality, the City plans to convert an unused storage basin into a 6.9-acre freshwater treatment wetland. The City will route up to 0.95 million gallons per day of its secondary-treated wastewater through a new nitrification system and then to the treatment wetland for denitrification and photolysis (light-induced decomposition of organic contaminants) prior to discharge.

This Tentative Order is consistent with the permits for several existing treatment wetlands in our Region and may serve as a model for some future treatment wetlands under consideration. For example, it grants an exception to the Basin Plan prohibition against discharges that do not receive a minimum initial dilution of at least 10:1, finding instead that prohibiting the discharge would place an inordinate burden on the City relative to the beneficial uses protected, and that an equivalent level of environmental protection is achieved through alternate means (i.e., by providing nitrification, denitrification, and the removal of trace organic contaminants by passing secondary-treated effluent through the new nitrification system and wetland). The Tentative Order also authorizes mixing zones and dilution credits where warranted (i.e., for ammonia, copper, and cyanide).

We did not receive comments on a tentative order circulated for public review. We corrected a minor typographical error but did not substantively revise the Tentative Order; thus, we expect it to remain uncontested.

**APPENDIX:**

A. Tentative Order

Appendix A  
Tentative Order