

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

MEETING DATE: April 9, 2025

ITEM: 4

Executive Officer's Report

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**Water Boards Stopped Work on Navy Base Realignment and Closure Facilities
(Jessica Watkins)**

On March 26, 2025, Deputy Director Phillip Crader of the State Water Resources Control Board (State Water Board) directed Department of Defense (DoD) Program staff at the State and Regional Water Boards to cease work at Navy Base Realignment and Closure facilities on March 31, 2025. Starting July 1, 2025, the Water Boards' DoD Program staff may resume work as the program will be entering into a new fiscal year budget. Water Boards' staff may be able to resume work earlier if the Navy can obtain additional funding for the Water Boards to support work efforts as requested by the Department of Toxic Substances Control (DTSC) on February 24, 2025.

During the stop work order, Regional Water Board DoD Program staff will cease working on the investigation and cleanup of the following seven Navy facilities:

- Alameda Naval Air Station, Alameda
- Concord Naval Weapons Station, Concord
- Hunters Point Naval Shipyard, San Francisco
- Mare Island Naval Shipyard, Vallejo
- Moffett Field Naval Air Station, Mountain View
- Point Molate, Richmond
- Treasure Island Naval Station, San Francisco

These DoD facilities comprise many individual cleanup sites, as most DoD facilities are like small industrial cities with a variety of pollution sources (e.g., landfills, gas stations, storage tanks, storm drains, pipelines, wash racks, dry cleaners).

The stop work order includes a request to extend our document review deadlines to ensure that Water Board DoD Program staff have enough time meet our obligations and our commitment to communities to ensure that the environmental impacts associated with past and present activities at military facilities are thoroughly investigated and appropriate remedial action taken as necessary to protect public health, welfare, and the environment.

Background

The DoD Program is funded in two-year periods through the Defense State Memorandum of Agreement (DSMOA). We are currently in the first year of the two-year cycle for fiscal years 2024/25 and 2025/26 (i.e., 2024-2026). As part of the Defense State Memorandum of Agreement 6-Step process, State Water Board submitted the Water Boards' budget estimate for 2024-2026 to DTSC, which manages the statewide Defense State Memorandum of Agreement budget on behalf of state agencies. The budget estimate was based on estimated personnel hours to support the work details outlined in each facility's Joint Execution Plan. The Joint Execution Plans are essentially a work plan for each facility that establishes the scope of services agreed upon by the DoD and state regulatory agencies.

The table below shows that the Navy only awarded 59% of the Water Boards’ budget estimate for fiscal year 2024/25. The Navy did not make corresponding reductions to the scopes of work in the Joint Execution Plans.

| Defense State Memorandum Of Agreement Account | State Water Board Budget Estimate (FY2024/25) | State Water Board Approved Amount | Percent of Budget Estimate Awarded by Navy |
|--|--|--|---|
| Navy BRAC | \$1,535,835 | \$916,169 | 59% |

Regional Water Board staff has been proactively communicating with our partners at the State Water Board, Navy, and U.S. EPA about the budget shortfall. As early as September 2024, Regional Water Board staff alerted the State Water Board and Navy that despite our best efforts to conserve and stretch the budget (e.g., cancelling attendance at non-essential meetings), the Regional Water Board expected to run out of budget by January 2025 for high priority Navy sites such as the Alameda Naval Air Station, Hunters Point Naval Shipyard, and Treasure Island Naval Station. The importance of our work at these facilities was highlighted during our [DoD Program Update](#) to the Board in February 2024.

Program Staffing Impacts

There are currently 16 DoD facilities in our Region undergoing investigation and cleanup (including the 7 Navy BRAC facilities). DoD Program oversight is provided by 10 staff across 2 sections in the Groundwater Protection and Waste Containment Division; this was previously 12 staff, but we lost two positions in July and December 2024 as part of efforts to reduce statewide operating expenses. DoD Program staff spend about 30 percent of their time overseeing Site Cleanup Program (SCP) cases, which is covered by case-specific cost-recovery resources, and to a lesser extent Underground Storage Tank (UST) Program cases.

During the stop work order, DoD Program staff will continue to work on other funded active and closed military facilities (e.g., Travis Air Force Base, Military Ocean Terminal Concord), Site Cleanup Program cases, and Underground Storage Tank cases. DoD Program staff will also take on additional Site Cleanup Program and Underground Storage Tank program cases. The Toxics Cleanup Division has identified a list of Site Cleanup Program and Underground Storage Tank program cases that DoD Program staff are able to take on to be able to continue to work during the stop work order. State Water Board has confirmed that it is acceptable to increase billing to the Site Cleanup Program and Underground Storage Tank programs for the rest of the fiscal year to accommodate the reduced DoD billing.

Halo Ranch Mitigation Bank (Elizabeth Morrison and Keith Lichten)

On February 4, 2025, the Bank Enabling Instrument for the Halo Ranch Mitigation Bank (Bank), located on a 123-acre parcel alongside the Petaluma River in Sonoma County, was signed. The purpose of the Bank is to compensate for unavoidable impacts to, and conserve and protect waters of the U.S. and the State.

The Bank Enabling Instrument sets forth the agreement regarding the establishment, use, operation, and maintenance of the Bank. The Bank Enabling Instrument details how the Bank Sponsor will preserve, restore, and/or establish and then manage and maintain Waters of the U.S. and State, and includes a Development Plan, an Interim Management Plan, a Long-term Management Plan, and Endowments. The Bank will be conserved and managed in perpetuity via a recorded Conservation Easement. Other signatory agencies of the Bank Enabling Instrument are the U.S. Army Corps of Engineers and U.S. Environmental Protection Agency.

Mitigation banks provide compensatory mitigation credits for off-site project aquatic and species impacts and are particularly useful for projects with small impacts, where on-site mitigation is not feasible. The signatory agencies have agreed to an amount of 'credits types' for the Bank, as well as a 'Service Area', a project needs to be within the Bank's Service Area to purchase credits from the Bank. A percentage of the credits are released over a period of years as performance criteria are met.

The Bank will restore and enhance tidal wetlands, seasonal wetlands, and a creek on agricultural lands. The mosaic of restored waters will mimic the historical condition of the area and provide valuable ecosystems services for the watershed, including water quality improvement, sea-level resilience, wildlife habitat, and storm surge protection.



Figure 1: Halo Ranch Mitigation Bank, Petaluma River, February 2025

13267 Order Requiring PFAS Investigations at 12 Closed Landfills (Keith Roberson)

On March 10, Executive Officer Eileen M. White, on behalf of the Board, issued Order R2-2025-0005 pursuant to California Water Code section 13267 requiring 12 closed landfills to perform per- and polyfluoroalkyl substances (PFAS) investigations. This Order is similar to State Water Board Order WQ 2019-0006-DWQ issued in 2019 that required PFAS sampling of landfill leachate and groundwater at almost 200 landfills across California, including 27 disposal sites in our Region (10 active landfills and 17 closed disposal facilities). Regional Water Board Order R2-2025-0005 requires PFAS sampling at 12 closed landfills that were not included in the State Water Board Order. This will increase the number of landfills in our Region with PFAS data to 39. Most of the 12 additional landfills are located along the margin of the San Francisco Bay and are vulnerable to sea level rise.

The sampling performed in response to the 2019 State Water Board order revealed that PFAS are essentially ubiquitous in landfill leachate (although not all landfills have leachate monitoring wells or collection capability). PFAS were found in groundwater monitoring wells at the vast majority of landfills as well, although groundwater concentrations were significantly lower than leachate concentrations, as was expected. An analysis of PFAS concentrations in our regional landfills found that, in general, PFAS concentrations in leachate at the 10 active landfills were much higher than in leachate at the older, closed landfills (see Table 1, below). The reverse was found to be true in groundwater, with higher PFAS concentrations associated with the older, closed landfills. We believe this reflects that the older landfills were constructed without composite base liners (required since 1993); the landfills that remain active have a significant proportion of disposal cells that were built with composite base liners, and these provide much better leachate containment, as reflected in the ratios of groundwater concentrations to leachate concentrations shown in Table 1 below.

Our new Order requires the dischargers to submit a sampling and analysis workplan by May 10, 2025. Order R2-2025-0005 requires some information that was not required by the 2019 State Water Board order; it requires PFAS sampling of stormwater and landfill gas condensate, in addition to sampling of landfill leachate and groundwater. It also requires analysis using a newer USEPA-approved method that quantifies 41 different PFAS compounds, as opposed to the 24 compounds that were quantified using the previously recommended method.

| Landfill | Total PFAS in Leachate (ng/L) | Total PFAS in Groundwater (ng/L) | GW/Leachate Ratio |
|--------------------------|-------------------------------|----------------------------------|-------------------|
| Active Landfills | | | |
| Potrero Hills | 34,713 | 2,123 | 6% |
| Newby Island | 20,740 | 2,689 | 13% |
| Vasco Road | 20,027 | 1,346 | 7% |
| Ox Mountain | 17,346 | 596 | 3% |
| Guadalupe | 16,425 | 457 | 3% |
| Keller Canyon | 13,330 | 67 | 0.5% |
| Redwood | 9,554 | <2.0 | ~0 |
| Clover Flat | 4,987 | 336 | 7% |
| Kirby Canyon | 4,451 | 100 | 2% |
| Acme (C&D only) | 2,897 | 58 | 2% |
| Closed Landfills | | | |
| West Contra Costa | 13,540 | 7,220 | 53% |
| Zanker Road | 12,288 | 175 | 1.4% |
| Santa Clara | 8,267 | 2,257 | 27% |
| West Winton | 4,648 | 1,378 | 30% |
| Highway 237 | 4,438 | 204 | 5% |
| Solano | 3,965 | 1,965 | 50% |
| Brisbane | 2,430 | 2,451 | 100% |
| Burlingame | 2,023 | 1,396 | 69% |
| Marsh Road | 1,897 | 516 | 27% |
| Story Road | 1,131 | 755 | 67% |
| East 3 rd Ave | 1,078 | 1.9 J | ~0 |
| Mussel Rock | 906 | 7.7 | 0.8% |
| Palo Alto | 40 | 177 | 442% |
| Pleasanton | NS | 105 | -- |
| Petaluma | NS | ND | -- |

| Landfill | Total PFAS in Leachate (ng/L) | Total PFAS in Groundwater (ng/L) | GW/Leachate Ratio |
|-----------------------------------|-------------------------------|----------------------------------|-------------------|
| Closed Landfills Continued | | | |
| Pinole Point | NS | 48 | -- |
| Napa Pipe | ND | ND | -- |

Table 1: PFAS Investigation Results at San Francisco Bay Regional Landfills required by State Water Board Order WQ 2019-0006-DWQ

Notes:

C&D = construction and debris

J = estimated value

ND = not detected

ng/L = nanogram per liter

NS = not sampled

Zone 7 Water Agency Opens Chain of Lakes PFAS Treatment Facility in Pleasanton (Carina Cornejo and Kimberlee West)

On March 26, Regional Water Board staff Alec Naugle (Toxics Cleanup Division Manager), Carina Cornejo, and Kimberlee West gathered with Tri-Valley officials, residents, and Zone 7 Water Agency staff members to celebrate the opening of Zone 7 Water Agency's newest state-of-the-art water treatment facility. The facility uses an ion exchange treatment process to remove per- and polyfluoroalkyl substances (PFAS chemicals) from groundwater at the Chain of Lakes supply wells in Pleasanton. Alec spoke on behalf of the Regional Water Board to congratulate Zone 7 Water Agency and honor our collaborative efforts to manage PFAS contamination in the Livermore Valley Groundwater Basin. Zone 7 Water Agency invited our staff to the ribbon-cutting ceremony due to our ongoing collaboration with the agency and strong support for project funding.

The treatment facility is the second of three that Zone 7 Water Agency has completed. Together, the facilities allow Zone 7 Water Agency to conjunctively manage the water supply, which involves recharging imported surface water when it is most plentiful and pumping it out as needed. The Chain of Lakes facility can treat about 10 million gallons per day to supply the Tri-Valley with safe, reliable drinking water that surpasses state and federal drinking water standards.



Photos: (Left) Alec Naugle presenting remarks at Zone 7 Water Agency Chain of Lakes PFAS Treatment Facility ribbon cutting event. (Right) Zone 7 and Water Board representatives gathering in front of the Chain of Lakes PFAS treatment vessels. From left to right: Valerie Pryor – Zone 7 Water Agency General Manager; Carina Cornejo – Regional Water Board PFAS case manager; Kimberlee West – Regional Water Board PFAS case manager; Alec Naugle – Regional Water Board Division Manager; Ken Minn – Zone 7 Water Agency Groundwater Resources Manager.

Bay Area Conservation and Development Commission (BCDC) San Francisco Shoreline Leadership Academy – Groundwater Rise Considerations at Contaminated Sites (Ross Steenson)

On the evening of March 5, 2025, Assistant Executive Officer Ross Steenson presented on Groundwater Rise Considerations at Cleanup Sites at the Exploratorium as part of San Francisco Shoreline Leadership Academy. The Academy is a 15-week training program for San Francisco high school juniors and seniors sponsored by the Bay Conservation and Development Commission (BCDC) and the Port of San Francisco. Participants tour parts of the San Francisco shoreline and receive training on a variety of topics including sea level rise, flooding, beneficial reuse of sediment, and economic development. In addition to weekly virtual and in-person meetings and discussions, participants must create and present a final project that combines their learnings. Upon completion, participants receive an \$1,800 stipend and have a chance to apply for a summer internship with the Port of San Francisco. During the March 5th event, Exploratorium staff introduced groundwater rise with slides and an interactive exercise, BCDC staff presented on environmental justice followed by the San Francisco Bay Regional Water Board presentation, and then the students worked on their projects. Ross Steenson presented similar information on groundwater rise at contaminated sites as that presented during our October 2024, Board meeting along with a summary of state employment opportunities. Fifteen students participated and the presenters received good questions and active participation from all.

Staff Updates (Eileen M. White)



On April 11, 2025, Cleet Carlton will retire after 20 years as an engineering geologist for our site cleanup, landfill, and enforcement programs. He joined the San Francisco Bay Regional Water Board in 2005 as a licensed Professional Geologist with Bachelor and Master of Science degrees in geological sciences from the University of California, Riverside and 18 years of environmental and geotechnical consulting experience. He quickly built a solid reputation as a diligent case manager and thorough investigator with a passion for the Water Board's mission. Recent examples of his casework include enforcement for wetlands fill at the Dhillons' Property (administrative civil liability, attorney general referral, and stipulated judgment) and overseeing cleanup at the Former Prosperity Cleaners site in Marinwood. He co-authored the *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites* and guidance documents for the Interstate Technology and Regulatory Council's Environmental Molecular Diagnostics team, presented on *Groundwater Sustainability Strategies* at the GeoSymposium for State Geologists, and participated in internal committees for groundwater protection, groundwater-surface water interaction, low-threat closure, and sustainable groundwater management. Cleet is a geologist at heart. His photographs of rock outcrops are displayed throughout our office walls, and one of his photographs of San Francisco Bay appears on the cover of our 2024 *Strategic Work Plan*. Although we will miss his diligence and technical input on cases, we are enormously grateful for his service and wish him the best in his well-deserved retirement.

Enforcement Actions (Brian Thompson and James Parrish)

The following tables show the proposed and settled enforcement actions since last month’s report. As the proposed settlements are pending and could come before the Board, ex parte communications are not allowed. Please refer to the [Pending Enforcement Liabilities and Penalties](#) webpage for more information on the details of the alleged violations and proposed settlements.

Proposed Settlements

The following are noticed for 30-day public comment periods. If no significant comments are received by the deadline, the Executive Officer will sign the orders implementing these settlements.

| Discharger | Violation(s) | Proposed Penalty | Comment Deadline |
|---|----------------------------|-------------------------|-------------------------|
| City of Burlingame and North Bayside System Unit | Discharge limit violations | \$6,000 ¹ | March 31, 2025 |
| City of San Mateo and the City of Foster City Estero Municipal Improvement District | Discharge limit violations | \$6,000 | April 3, 2025 |

¹ The penalty would supplement Regional Monitoring Program studies. The Regional Monitoring Program is managed by the San Francisco Estuary Institute to collect water quality information in support of management decisions to restore and protect beneficial uses of the Region’s waters.

Settled Actions

On behalf of the Board, the Executive Officer approved the following:

| Discharger | Violation(s) | Imposed Penalty | Supplemental Environmental Project |
|--|----------------------------|------------------------|---|
| Advanced Micro Devices, Inc. | Discharge limit violations | \$6,000 | - |
| IQHQ-Spur Ph I, LLC | Discharge limit violations | \$6,000 | - |
| Millbrae Adrian Science Park LLC | Discharge limit violations | \$12,000 | - |
| Santa Clara University | Discharge limit violations | \$12,000 | - |
| Crockett Cogeneration LLP | Discharge limit violations | \$3,000 | - |
| Tesoro Refining & Marketing Company LLC | Discharge limit violations | \$15,000 | - |
| IQHQ ELCO Yards, LP | Discharge limit violation | \$3,000 | - |
| Samuel Merritt University | Discharge limit violations | \$6,000 | - |
| City of Benicia | Discharge limit violations | \$3,000 | - |
| Lockheed Martin Corporation | Discharge limit violations | \$6,000 | \$6,000 ¹ |
| Cedar Fair Entertainment Company | Discharge limit violations | \$21,000 | - |
| City and County of San Francisco (Oceanside Water Pollution Control Plant) | Discharge limit violations | \$6,000 | \$6,000 ¹ |
| City and County of San Francisco (Southeast Water Pollution Control Plant) | Discharge limit violations | \$3,000 | \$3,000 ¹ |

1 The penalty supplements Regional Monitoring Program studies.

401 Water Quality Certification Applications Received (Elizabeth Morrison)

The table below lists those applications received for Clean Water Act section 401 water quality certification from February 13 through March 12, 2025. A check mark in the right-hand column indicates a project with work that may be in the San Francisco Bay Conservation and Development Commission (BCDC) jurisdiction.

| Project Name | City/Location | County | May have BCDC Jurisdiction |
|--|----------------------|---------------|-----------------------------------|
| Geotechnical Borings for the Alameda Harbor Bay Ferry Terminal Modernization Project | Alameda | Alameda | ✓ |
| Driveway & Storm Drain Improvements 935 Shattuck Ave | Berkeley | Alameda | |
| Geotechnical Borings at the Oakland Ferry Terminal | Oakland | Alameda | ✓ |
| Roadway Edge Stabilization Project at Westmoorland Drive | Oakland | Alameda | |
| San Leandro Creek Storm Damage Repair at 1073, 1045 Lee Ave, 881 St Mary's Ave (Zone 13, Line P) | San Leandro | Alameda | |
| Interstate (I-) 680 Alameda Creek Bridge Scour Repair Project | Sunol | Alameda | |
| Amorco Marine Terminal - 2025 MOTEMS Repair Work Project | Martinez | Contra Costa | ✓ |
| Tomato Stand Fish Passage Project along Pinole Creek | Unincorporated | Contra Costa | |
| Retaining Wall Replacement, 59 Ignacio Ln | Novato | Marin | |
| Novato Creek Sediment Maintenance And Wetland Enhancement Project | Novato | Marin | |
| Emergency Rootwad Removal Smith Property Blossom Creek Calistoga | Calistoga | Napa | |
| WETA San Francisco Downtown Ferry Terminal Universal Charging Float | San Francisco | San Francisco | ✓ |

| Project Name | City/Location | County | May have BCDC Jurisdiction |
|--|----------------------|---------------|-----------------------------------|
| Pier 27 Emergency Maintenance Dredging Project | San Francisco | San Francisco | ✓ |
| Brannan Street and Sansome Street Outfall Improvements Project | San Francisco | San Francisco | ✓ |
| India Basin Shoreline Park Project | San Francisco | San Francisco | ✓ |
| Bayfront Canal Maintenance Project | Redwood City | San Mateo | ✓ |
| Paulin Crossing and Landslide Repair Project | Unincorporated | San Mateo | |
| Purisima Pond | Unincorporated | San Mateo | |
| February 2025 Storm-Emergency Repairs | Unincorporated | San Mateo | |
| Steppingstone Wetland Enhancement Project | San Jose | Santa Clara | |
| Rancho Cañada de Pala Preserve Initial Site Improvements Project | Unincorporated | Santa Clara | |
| Montezuma Harbor Maintenance Dredging | Suisun City | Solano | |
| Kellogg Resiliency Project | Suisun City | Solano | |