

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

**STAFF SUMMARY REPORT: Robert Schlipf
MEETING DATE: February 12, 2025**

ITEM: 6B

**City and County of San Francisco and North Bayside System Unit, San Francisco
International Airport Mel Leong Wastewater Treatment Plant and Wastewater
Collection Systems, San Mateo County – Reissuance of NPDES Permit**

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DISCUSSION:

This Revised Tentative Order (Appendix A) would reissue the NPDES permit for the San Francisco International Airport's sanitary and industrial wastewater treatment plants. The sanitary plant treats wastewater from aircraft and airport facilities, including terminal restrooms, hangars, restaurants, and shops. The industrial plant treats wastewater from maintenance shops and vehicle washing, and first-flush stormwater runoff from industrial areas. During the dry season, the plants treat and discharge about 1.0 million gallons per day (MGD) of wastewater through a deepwater outfall shared with other North Bayside System Unit dischargers (i.e., the cities of Burlingame, Millbrae, South San Francisco, and San Bruno). The outfall is located northeast of Point San Bruno, approximately 5,300 feet offshore in Lower San Francisco Bay.

The most significant changes to the discharge anticipated over the coming permit term are that the Airport plans to implement projects that would (1) reduce effluent total inorganic nitrogen concentrations to below 15 mg/L, (2) increase water recycling by an average of 1.0 MGD by constructing an Advanced Water Treatment Plant (to include membrane filtration, reverse osmosis, and UV disinfection), and (3) test PFAS removal by treating combined effluent from the sanitary and industrial Plants with granular activated carbon.

We received comments (Appendix B) from the City and County of San Francisco on the Tentative Order and prepared a response to the comments (Appendix C). San Francisco requests that the Board revise the Tentative Order to remove receiving water limitations and requirements that prohibit the discharge from causing pollution, contamination, or nuisance. As explained in the Response to Comments, we disagree. The receiving water limitations and prohibition against nuisance are consistent with the Clean Water Act, NPDES regulations, State water quality standards, and State Law. The provisions serve as backstops in case effluent limitations and other permit provisions prove to be inadequate. The same receiving water limitations and the prohibition against nuisance appear in nearly all NPDES permits in the Region. San Francisco's comments are consistent with those it made on the San Francisco Oceanside NPDES Permit (R2-2019-0028) (Oceanside permit). That permit is subject to litigation. U.S. EPA's Environmental Appeals Board and the Ninth Circuit Court of Appeals upheld similar provisions in the Oceanside permit. The U.S. Supreme Court heard oral arguments on October 16, 2024, and we expect it to rule sometime this year. San Francisco says it submitted its comments for consistency with its previous comments. We do not expect this item to be contested at the Board hearing.

The Revised Tentative Order reflects some minor formatting changes and includes clarifying language about the startup of new treatment plant units and monitoring locations as requested by San Francisco. These changes are shown in the Response to Comments.

APPENDICES:

- A. Revised Tentative Order
- B. Comments
- C. Response to Comments

Appendix A
Revised Tentative Order

Appendix B

Comments

For an electronic copy of the comments, please contact Robert Schlipf via email at Robert.Schlipf@waterboards.ca.gov or at (510) 622-2478.

Appendix C
Response to Comments