2024 Annual Pollution Prevention Report

for the

City of Livermore

NPDES Permit #: CA0038008

Period Covered by this Report: January 1, 2024 through December 31, 2024

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CITY OF LIVERMORE CALIFORNIA
WATER RESOURCES

City of Livermore
2024 Annual Pollution Prevention Report

Report Cover Sheet

NPDES Permit Holder: City of Livermore, Alameda County, California
Report Date: February 28, 2025
Period Covered by This Report: 01/01/2024 through 12/31/2024

Name of Wastewater Treatment Plant:

City of Livermore Water Reclamation Plant (LWRP)

NPDES Permit Number:

CA 0038008

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I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

2/19/25
Date

Signature of Official

Anthony Smith
Water Resources Division Manager, City of Livermore

Table of Contents

City of Livermore
2024 Annual Pollution Prevention Report

1. Water Reclamation Plant

The Livermore Water Reclamation Plant (LWRP) provides wastewater collection, treatment, and disposal for approximately 87,955 Livermore residents (according to the 2020 Census), local business, industry, and a few areas outside of the City limits including Sandia National Laboratory (SNL) and the Ruby Hills development. The LWRP is located on approximately 40 acres on the Western edge of the City. The down gradient location of the Plant allows most of the City's sewage to be collected by gravity.

The LWRP treated an average of 5.678 million gallons of wastewater per day in 2024. The maximum treated during this period was observed in February 2024 with an average influent of 6.924 million gallons per day. A portion of the LWRP influent is treated to reclaimed water standards and reused within the City. The major utilization of LWRP recycled water was used to irrigate landscaped areas at the LWRP, the municipal airport, Las Positas golf course, Las Positas Junior College, and landscaping along Isabel Avenue/Highway 84; in addition, the reclaimed water is used to provide fire protection for the airport hangars and local businesses. Additionally, recycled water is used for restroom toilets and landscaping in the Oaks Business Park development located near the intersection of Isabel Avenue and West Jack London Blvd.

The LWRP completed the last expansion in July 1993; this increased the firm reliable rated capacity of the plant to accommodate an average dry weather flow of 8.5 MGD. Based on this data the plant can currently accommodate future growth in the service area. Daily monitoring of treatment processes and equipment performance at LWRP helps to ensure continuous compliance with all currently established requirements. Process control samples are taken daily, and analytical results are used to adjust process parameters. The plant's Supervisory Control and Data Acquisition (SCADA) system monitors, controls and notifies operators of malfunctions. All historical data is backed up and saved on a regular basis. To help ensure that critical equipment can be relied upon, the City has a preventative and corrective maintenance program. Maintenance requirements for equipment are catalogued within the computerized maintenance management system (CMMS) and work orders are tracked to ensure that maintenance is performed.

Under the pretreatment program, the City issues wastewater discharge permits on an annual basis to each significant industrial user (SIU), and any other users determined to be of potential concern to the LWRP. The permits contain a statement of duration, a statement of non-transferability, applicable effluent limitations, self-monitoring and reporting requirements, and a statement of applicable penalties. In addition to the self-monitoring performed by SIUs, the City conducts inspections and sampling of each SIU a minimum of once per year. The City has developed an Enforcement Response Plan (ERP) which lists the escalating enforcement procedures used by the City to enforce

Federal, State, and Local discharge limitations and regulations. The pretreatment program maintains an inventory of industrial businesses in the City by working with other City departments, reviewing business license information, reviewing planning and building project referrals, and conducting business and industrial park survey inspections. In addition, City staff performing inspections under the Stormwater and Pollution Prevention Programs identify facilities of concern to the pretreatment program.

Industrial contributions account for approximately 10% of the total flow to the LWRP. The largest users, Lawrence Livermore National Laboratory & Sandia National Laboratory, comprised combined average daily discharge of 254,155 gallons, which represented approximately 4.48 percent of the total influent flow on the average day to the LWRP in 2024.

The City's Pretreatment Program helps educate citizens groups and industrial users about the needs and problems associated with operating a wastewater treatment plant by providing informational brochures and facility tours. For more information on public activities by the City see section 12.0 entitled "Public Participation Summary".

Tetra Tech Inc., a USEPA contractor, conducted a Pretreatment Compliance Audit (PCA) of the City of Livermore's Industrial Pretreatment Program on April 20-21, 2017. On February 20, 2018, the City of Livermore received a copy of the "Pretreatment Compliance Audit Final Summary Report" sent by the San Francisco Regional Water Quality Control Board. The City submitted a detailed response addressing each of the "Required" actions and "Recommendations" that were contained in the Pretreatment Compliance Audit Summary Report to the San Francisco Bay Regional Water Quality Control Board on April 16, 2018.

The City of Livermore is a part of the statewide "California Water/Wastewater Agency Response Network" (CalWARN). The CalWARN agreement provides the basis for providing and receiving aid between wastewater treatment and collection system agencies in times of major emergencies. Safeguards to minimize accidental discharge from the wastewater treatment plant are built into the design and operation of facilities and equipment. Storage tanks are constructed with the required 110% of secondary capture volume to mitigate any accidental discharge. These are inspected periodically to ensure their integrity. Scenarios for accidental discharge from plant process tanks have been reviewed and it is concluded that any discharge would be minimal. If a discharge should occur, the plant under-drain system would capture and direct all such discharges to the LWRP lined holding basin for proper treatment. The City of Livermore's Engineering Division manages the Capital Improvement Program (CIP) for the Water Resources Division (WRD). All WRD sections contribute to the planning and budgeting efforts for current and future CIP projects. The Engineering Division has assigned an Associate Engineer to implement and manage the CIP for WRD-related projects, as well as any emergency projects that may arise. The Engineering Division is adequately staffed to support current needs of the WRD.

The following provides a summary of the major CIP projects that were planned and/or commenced during the reporting period:

Sanitary Sewer System

Point Repairs

During 2024, repairs done in-house within the city's existing sanitary sewer system consisted of 2 mainline repairs, 5 lateral spot repairs, and 5 manhole rehabilitations. Also, the city used on-call contractors to perform repairs which consisted of 1 manhole rehabilitation and 1 sewer mainline replacement identified during CCTV inspection. Spot repairs are identified as mainline or lower lateral problems found during regular maintenance cleaning or televised sewer inspection by Collection Systems Section staff. Typical repairs include the replacement of pipes with severe offset joints, broken pipe segments, short sags, and damaged manhole channels.

Annual Sanitary Sewer Replacement – CIP Project 201803 / 202203

In some cases, the sewer inspection activities referenced above lead to the identification of pipeline segments that require full replacement instead of spot repair. These identified pipeline segments are replaced using trenchless or opencut construction methods. These pipeline segments usually are replaced as part of a single Capital Improvement Project every few years.
In 2024, the City of Livermore continued to plan for an upcoming Sanitary Sewer Replacement project. This project is currently in the design and review stage. The completion has been delayed due to resource constraints, but the following activities were accomplished in 2024:

- The City conducted an extensive site evaluation along the alignment of the proposed sewer improvements to confirm sewer lateral and existing utility infrastructure locations. A number of conflicts with existing utilities were identified. The City has evaluated options for design modifications to resolve these conflicts, roadway impacts, and associated restoration.
- The City coordinated right of entry agreement with Livermore Area Recreation and Park District (LARPD) to provide staging area during construction.
- The City coordinated utility conflicts with California Water Service.
- The project is nearing the end of design and construction is expected to begin in summer of 2025. Project completion is expected in summer of 2026.

Treatment Plant

WRP Primary and Secondary Treatment Improvements

The WRP Primary and Secondary Treatment Improvements Project includes modifications to the Influent Pump Station, Primary Effluent Pump Station, Primary Clarifiers, Secondary Clarifier No. 2 and Odor Control system. Replacing aged equipment will increase the efficiency and reliability of plant operations. Structural rehabilitation will extend the useful life of treatment systems. Adding an open channel grinder will allow for bypassing the bar screen should the bar screen fail, improve treatment, and reduce maintenance of downstream equipment. Increasing the size of the odor control treatment system will increase ventilation, reduce odors, and reduce future corrosion. The odor control system will be expanded to include the primary effluent pump station and the grit building. A notice to proceed with construction was issued in September 2022. The project has reached the substantial completion, and the contractor has vacated the site.

UV Disinfection System Replacement

The aging UV system requires replacement to increase system reliability, reduce operation and maintenance costs, and meet all the regulatory compliance requirements. A capital project is underway to replace the existing UV lamp modules and other supporting components. The design is completed, and construction has started in April 2024. The new system is anticipated to be fully in operation by Spring of 2026 with minimal impact on current operations.

SCADA Server Replacement Project

The recent SCADA Master Plan identified the replacement of the WRP SCADA servers as a priority. This project, kicked off in April 2022, will replace obsolete server hardware and software to establish a more reliable platform for all SCADA applications and all subsequent SCADA Master Plan projects. This project will also upgrade the existing Human-Machine Interface applications while implementing foundational aspects of the SCADA Master Plan. The new system has been fully operational since Spring 2024.

SCADA Network Upgrade Project

The recent SCADA Master Plan also identified upgrades to the SCADA network as another important component of improving the overall SCADA system. This project will replace existing network cables and equipment to establish a self-healing ring topology for improved SCADA system communication reliability. This project was kicked off in September 2023 and is currently under the 90% design. The project is scheduled to be completed by Spring 2026.

2. Source Control Section

The City of Livermore Water Resources Division's Source Control Section implements the City's Pollution Prevention, Pretreatment, and Stormwater Programs. During the third quarter of this reporting period, the Source Control Supervisor retired and the position was assumed in an "acting" capacity by the Source Control Coordinator; this resulted in a decrease in staff available for inspections/sampling/permitting/pollution prevention activities and an increased workload for the three remaining Source Control Inspectors. The projected recruitment date for the supervisor position is February 2025. In addition, the Water Resources Division Communications Representative left the position in the first quarter of the reporting period, resulting in a significant loss of ability to complete the City's usual pollution prevention activities; this position is expected to be filled during the 2025 reporting year.

Under the Pretreatment Program, the City issues wastewater discharge permits on an annual basis to each significant industrial user (SIU) and any other users determined to be of potential concern to the LWRP. The permits contain a statement of duration, a statement of non-transferability, applicable effluent limitations, self-monitoring and reporting requirements, and a statement of applicable penalties. In addition to the self-monitoring performed by SIUs, the City conducts inspections and sampling of each permitted facility at least once a year. The City has developed an Enforcement Response Plan (ERP) which lists the escalating enforcement procedures used by the City to enforce Federal, State, and Local discharge limitations and regulations. The pretreatment program maintains an inventory of industrial businesses in the City by working with other City departments, reviewing business license information, reviewing planning and building project referrals, and conducting business and industrial park survey inspections. Source Control sections staff also performs inspections under the Stormwater and Pollution Prevention Programs to identify facilities of concern for the Pretreatment Program.

The City of Livermore is subject to the requirements of the Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018 NPDES permit (MRP 3.0) issued to the City of Livermore and the Alameda County Clean Water Program. This permit requires the City to implement the following:

a. Perform commercial and industrial facility inspections of all facilities with the potential to impact stormwater every five years.
b. Review plans to ensure that the stormwater treatment design and controls are incorporated into new developments.
c. Inspect stormwater treatment controls to verify proper functioning and maintenance.
d. Identify and abate illicit discharges.
e. Perform public outreach educating residents about stormwater pollution and pollution prevention.

3. Previous Report Comments

The City of Livermore received comments from the San Francisco Regional Water Quality Control Board regarding its 2023 Annual Report indicating that the City's Pollution Prevention Program requirements were fulfilled.

4. Pollutants of Concern and Source Reduction Tasks

Mercury

Mercury remains the first pollutant of concern for the LWRP Pollution Prevention Program as required by our NPDES permit. Current mercury sampling data continues to demonstrate that the LWRP's effluent remains well below the current effluent limit contained in our permit.

The Mercury Reduction Menu prepared by EIP Associates for the Bay Area Pollution Prevention Group (BAPPG) was used to identify and evaluate potential sources and control strategies. The Mercury Reduction Menu summarized mercury reduction programs for sources such as hospitals/clinics, dental offices, laboratories, educational institutions, and the more general group of commercial businesses and households. Comparing this Menu to the LWRP service area yielded some potential sources to evaluate further, such as Valley Memorial Hospital (currently Stanford Health Care - Valleycare Medical Center), dental offices, Lawrence Livermore National Laboratory, and Las Positas College. While the flow to the LWRP is roughly 90% domestic, our service area does contain businesses with the potential for elevated mercury levels.

The following tables provide a description of the Proposed Mercury Program Tasks, as well as a status report summarizing the status of each proposed task.

Proposed Mercury Reduction Tasks

Regional Efforts

Proposed Task	Status/Description/*Discussion*
Participate w/Regional Board staff and BAPPG to define "baseline" mercury P2 program	**Status:** **Ongoing**. Continue to work with BAPPG and Regional Board staff to identify the minimum tasks in acceptable mercury P2 program for various agencies. Possible components: • Minimum source ID efforts • Required Program Elements or a Menu of Elements to pick from • "Tiered" requirements by POTW size or compliance needs
Participate in BAPPG Dental Subcommittee	**Status:** **Completed**. Participated in the Dental Subcommittee to evaluate Dental BMPs, Self-certification and Inspection Checklists, and outreach materials.
Contribute to Regional training efforts as possible (CWEA, WRPPN, etc.)	**Status:** **Ongoing**. Participate in CWEA P3S Committee to help provide conferences and/or presentations as time allows.

Hospital/Medical Offices

Proposed Task	Status/Description/*Discussion*
Evaluate Valley Memorial Hospital Sampling Data	**Status:** **Completed**. Review historic mercury sampling data for Valley Memorial Hospital (VMH) to determine if we can estimate a loading, or if all data is below detection limits. If possible, estimate loading from VMH. *Historical sample data for 1997-2002 was reviewed. Almost all the Hg analysis data was reported as Non-Detect, as the results were below the 0.0002 mg/l detection limit.*
Conduct Education/Outreach at Valley Memorial Hospital	**Status:** **Completed.** Provide mercury outreach materials to VMH staff for distribution. Offer outreach presentations to VMH staff and conduct up to three presentations for staff if requested. Staff has distributed mercury outreach material including a self-assessment audit checklist. *No requests for presentations had been received.*

Dental Offices	
Proposed Task	**Status/Description/*Discussion***
Revise Dental Program to bring into compliance with 40 CFR Part 441	**Status: Completed**.
Maintain Dental Office Database	**Status: Ongoing.** Review business license listing, internet, or other sources to update a comprehensive list of all dental offices in Livermore. *Staff continues to update this facility list while implementing the Dental Mercury Pollution Prevention Permit Program*.
Collect samples from representative dental offices to evaluate loading	**Status: Completed**.
Permit Dental Offices using CDA and BAPPG Dental Self-certification Checklists	**Status: Ongoing.** Mail mercury outreach packets to all local dentists. Packets include dental practice information regarding amalgam use and mercury waste disposal, and two self-certification statements declaring that the facility has implemented the California Dental Association and BAPPG's accepted best management practices (BMPs) relating to amalgam use and mercury waste disposal.
Audit Dental Offices using BAPPG Dental Inspection Checklist	**Status: Ongoing.** Contact dental offices to set up site visits/inspections. Meet with office manager or ES&H staff to explain program. Conduct walk-through of mercury handling procedures, separator cleaning practices, and disposal of mercury-containing wastes. Verify that facilities are implementing the BMPs as stated in their self-certification statements. Provide additional outreach materials as appropriate. *All dental facilities will receive an audit a minimum of once during the 2020-2025 permit cycle.*

Lawrence Livermore National Laboratory	
Proposed Task	**Status/Description/*Discussion***
Review sampling data to evaluate loading	**Status: <u>Ongoing.</u>** LLNL submits sampling data for their Sewer Monitoring Facility on a monthly basis, which is evaluated by the assigned Source Control Inspector upon receipt.
Conduct Education/Outreach to LLNL and Sandia staff	**Status: <u>Ongoing</u>.** Inform LLNL Wastewater Monitoring and Guidance Group to inform them of mercury issue. Determine which areas of LLNL have on-going or current mercury discharges. Target area with current mercury use for outreach efforts. Develop targeted outreach, including bulletins, lab sink "reminder" stickers, etc. Perform general mercury outreach through LLNL newsletter, and at employee outreach events.
Evaluate plumbing/trap cleaning opportunities	**Status: <u>Completed</u>.** Determine areas of historic mercury use & possible contamination or legacy pollutants in sewer system. Conduct trunk line sampling, if possible, to identify potential "hotspots". Review sampling from historic trunk line cleaning or sewer relining activities. Review cost/benefit of cleaning sewers to reduce leaching of mercury from sewer sediments. *LLNL submitted evaluation on August 7, 2008.*
Review LLNL "internal" mercury discharge limit	**Status: <u>Completed</u>.** Review "average" mercury concentrations of retention tank discharges to determine if significant amounts of mercury are being discharged from current operations. Evaluate amount or percentage of mercury discharged above LWRP local limits but below LLNL Internal Discharge Limits to quantify reduction possible through enforcing LWRP limit for all internal LLNL discharges. *LLNL submitted evaluation on August 7, 2008.*

Other Commercial Businesses	
Proposed Task	**Status/Description/*Discussion***
Review past sampling and local limits submittal to evaluate loading	**Status: Ongoing.** Review loading calculations from Local Limits submittal to estimate the contribution from permitted industrial users and/or unpermitted commercial users. Use this value in source identification estimates to improve mass-balance. *Staff routinely reviews monitoring data from permitted facilities and addresses mercury-related issues as required.*
Conduct Education/Outreach	**Status: Ongoing.** If any permitted industrial users are identified with significant mercury loading, provide educational materials and outreach visits to inform them of the mercury program. *Staff routinely reviews monitoring data from permitted facilities and addresses mercury-related issues as required.*
Encourage proper disposal of lamp and mercury-containing equipment	**Status: Addressed by Universal Waste Rule/CUPA.** Distribute information on Universal Waste Rule provided by the Livermore Pleasanton Fire Department (LPFD) or Department of Toxic Substances Control during future inspections, if available. *Although LPFD is tasked with enforcing the Universal Waste Rule as the CUPA, Source Control staff will continue to encourage and promote proper disposal of lamp and mercury-containing equipment.*

Livermore Water Reclamation Plant	
Proposed Task	**Status/Description/*Discussion***
Prohibit Dry Weather Diversion from Stormwater Pump Stations to LWRP	**Status: Completed; February 2009**

Residential	
Status/Description/*Discussion*	**Status/Description/*Discussion***
Support SB 633 Mercury Products Ban	**Status: Completed.**
Review past sampling and local limits submittal to evaluate loading	**Status: Completed.**
Conduct Education/Outreach	**Status: Ongoing.** Distribute "general" outreach information on wastewater and stormwater pollution prevention (including mercury information as available) at community events. Distribute mercury information to residents participating in the thermometer take-back program at LWRP. *The Water Resources Division continues to perform this task by participating in community events.*
Conduct Mercury Thermometer Take-Back Program	**Status: Completed.** Distribute mercury-free digital thermometers in exchange for old mercury-containing ones. This program was terminated in 2018.

Tritium

In 1997, Tritium was selected as a pollutant of concern to protect LWRP's recycling and reuse opportunities using the newly built microfiltration/reverse osmosis facility. The reverse osmosis facility was shut down in 1999, and there are no plans at the present time to utilize this facility.

Tritium remains on the list as the second pollutant of concern since it's routinely used by Lawrence Livermore National Lab (LLNL) as a target material for laser experiments to produce energy. LLNL provides a split of one daily sample each month to an off-site contract analytical lab. The analytical results continue to be well below the Department of Energy's annual tritium limit of 5 Curies.

Copper and Cyanide

LWRP's NPDES permit requires that copper and cyanide remain listed as pollutants of concern. Source Control Section staff conducts activities to address these targeted pollutants, including a comprehensive inspection/survey and sampling program of vehicle service facilities, commercial printers, metal finishers, semiconductors, electronic component manufacturers, photo processors, and other commercial and industrial users on an on-going basis. For additional information on the program, please see "Section 8 - Discussion of Current Efforts and Progress".

Fat, Oils and Grease (FOG)

FOG was selected as a pollutant of concern to help the LWRP meet the primary objectives of the FOG Control Program contained in the City's Sanitary Sewer Management Plant (SSMP). The Program's primary objectives include the following items: proper management of residential and Food Service Establishment (FSE) fats, oils, and grease (FOG); proper operation and maintenance of FSE grease removal devices (GRDs); proper operation and maintenance of tallow bins; and proper record keeping of GRDs and tallow bins. As part of the FOG Control and Stormwater Programs, oil/grease interceptors are inspected twice a year by Collections/Source Control Section staff; and oil/grease traps, Big Dippers, Trapzillas, tallow bins and maintenance records are inspected once every three years by Source Control Section staff. During this reporting period, 210 FOG (Interceptor) inspections were performed

Source Control and Collection Sections staff continue to map Livermore's Food Service Establishments in the City's Geographical Information (GIS) System to effectively manage the FOG Control Program. This tool has enabled Collections/Source Control Section staff to track the following: existing and new FSEs with and without GRDs, vacant properties with GRDs, date of last FSE/GRDs' inspections, condition of GRDs, and potential sources for Sanitary Sewer Overflows (SSOs). In addition, the GIS System helps Collections Section staff identify and monitor FOG Hot Spots downstream of existing FSEs with GRDs in "Problem" or "Poor" condition.

Collections Section staff cleans and maintains the entire Collection's system every three years. Staff has identified some sanitary sewer mainlines with needing additional cleaning and are scheduled every 18 months. As a result of the FOG Control Program and the City’s aggressive inspection/cleaning/maintenance/television schedule, there has been a decrease in the total Sanitary Sewer Overflows (SSOs) since 2005.

Please see the following table for SSO details.

City’s Sanitary Sewer Overflows (SSOs) Results 2005-2024

Calendar Year	Number of SSOs attributed to FOG	Total Number of SSOs
2005	1.5	17
2006	1	8
2007	0	3
2008	0	3
2009	2	2
2010	1	5
2011	1	6
2012	0	0
2013	0	4
2014	0	3
2015	0	1
2016	1	4
2017	2	3
2018	0	7
2019	0	3
2020	0	5
2021	2	4
2022	0	2
2023	0	5
2024	0	3

Pharmaceuticals

The City of Livermore Water Resources Division, with the assistance of the Livermore Police Department (LPD), hosted the annual “Livermore Drug Take-Back Events” from 2008 to 2011 to help residents safely and properly dispose of unwanted prescription and over-the-counter drugs. Since 2010, pharmaceuticals have been identified as a pollutant of concern based on the growing concerns and documented prescience of these compounds in water and wastewater.

From 2012 to present, LPD staff, with the assistance of the Drug Enforcement Administration (DEA), continues to host biannual “Livermore Drug Take-Back Day”. These DEA National Prescription Drug Take-Back Days remain popular and successful events as demonstrated by the total pounds collected. To date, the program has collected a total of 11,862.5 pounds of pharmaceutical waste.

Please see the following table for a summary of drug take back events hosted by the City of Livermore:

Livermore / DEA National Prescription Drug Take-Back Day Results 2012-2024

Event Date	Pounds Collected
April 28, 2012	772.0
September 29, 2012	491.0
April 27, 2013	831.3
October 26, 2013	469.2
April 27, 2014	540.7
September 29, 2014	467.3
September 26, 2015	547.0
April 30, 2016	500.0
October 17, 2016	200.0
April 29, 2017	1,029.2
October 28, 2017	602.1
April 28, 2018	847
October 27, 2018	596
April 27, 2019	684
October 26, 2019	436
October 24, 2020	592
April 24, 2021	703.2
October 23, 2021	212.8
April 24, 2022	509.7
April 22, 2023	243
October 28, 2023	234
April 27, 2024	355
October 26, 2024	355
Total Pounds collected to Date	**11,862.5**

<u>Polychlorinated Biphenyls (PCBs)</u>

History of PCB Requirements and Reduction Efforts

The Mercury Watershed Permit Order No. R2-2007-0077 was amended in 2011 by Order No. R2-2011-0012 to add waste discharge requirements for Polychlorinated Biphenyls (PCBs). The amendment contains effluent limitations, monitoring, reporting, and source identification and control requirements. PCBs were not identified as a significant pollutant of concern because the LWRP influent and effluent samples analyzed for regulatory compliance on February 5, 2014, and August 6, 2014, were non-detectable, and the East Bay Discharger Authority's (EBDAs) 2014 monthly effluent samples for regulatory compliance were non-detectable. (EBDA's monthly limit for PCB's is 0.012 ppb and maximum daily effluent is 0.017 ppb.) The City continues to be in compliance with the effluent limits specified in Order R2-2011-0012; however, Provision C.7 of Order No. R2-2011-0012 requires the City to submit source identification and control evaluation results. To satisfy this requirement, the City continues to include a PCBs status report update in its Annual Pollution Prevention Reports.

PCBs are synthetic chemicals which are no longer produced in the United States, but as a result of its past use are still found as a legacy pollutant in the environment. PCBs were used as coolants and lubricants in transformers, capacitors, and other electrical equipment because of their superior thermal and electrical insulating properties. The manufacture of PCBs was banned in the U.S. in 1979 based on evidence that PCBs accumulate in the environment and can cause harmful health effects. Products made before 1979 that may contain PCBs include old fluorescent lighting fixtures, electrical devices with PCB-containing capacitors, and hydraulic oils. Today, PCBs can still be released into the environment from poorly maintained hazardous waste sites, illegal or improper dumping of PCB wastes, leaks or releases from electrical transformers, and disposal of PCB-containing consumer products into landfills not designed to handle hazardous waste.

Order No. R2-2011-0012 Amended the Mercury Watershed Permit Order No. R2-2007-0077 to include PCBs effluent limits and monitoring and reporting requirements. The City, listed as a municipal discharger, is subject to the Order's requirements. Provision V.C.7 of this order requires the City to evaluate and identify controllable sources of PCBs to the treatment plant. The Provision identifies these sources as:

- PCBs contributions to wastewater from industrial equipment; and
- PCBs contributions to wastewater from buildings with PCB-containing sealants that are scheduled for remodeling or demolition and identified as pilot projects required by the Municipal Regional Stormwater Permit Order No. R2-2015-0049 (MRP) Provision C.12.b.

Current Requirements and Reduction Efforts:

The City of Livermore is part of the East Bay Dischargers Authority and was issued Order No. R2-22-0025 (NPDES Permit No. CA0038008) for the Livermore Water Reclamation Plant on July 13, 2022. The City is also a member of the Bay Area Clean Water Agencies (BACWA). The NPDES permits issued to BACWA members impose requirements for PCBs that are most efficiently fulfilled as a group. Please see the attached BACWA letter submitted to the San Francisco Regional Water Quality Control Board on January 15, 2024. This letter provides a summary of the actions implemented to address Receiving Water Quality Monitoring, TMDL/SSO Support, Mercury and PCBs Watershed Permit Support, and Implementation of Copper Action Plans.

5. Employee Outreach Efforts

The Water Resources Division conducts outreach events and promotes opportunities for City staff to ensure they are aware of the City's pollution prevention efforts and to identify ways to reduce and prevent pollutant discharges from City facilities. In addition, staff is regularly provided opportunities to attend webinars and conferences to further their knowledge of P2 programs, requirements, and efforts.

6. Public Outreach Efforts

The Water Resources Division's Environmental Education Program is comprised of four components: (1) Events, (2) Programs, (3) Professional Training, and (4) Miscellaneous Outreach. The following is an overview of each component:

- Events: Staff attends local events such as festivals, farmers' markets, and creek clean-up events to educate the public about pollution prevention. Staff also place conditions and requirements on Special Use Permits issued to event vendors regarding proper disposal of used cooking oil wastes and litter/garbage removal.
- Programs: Staff routinely provide tours of the Livermore Water Reclamation Plant and provide educational opportunities via in-class elementary school programs focused on stormwater pollution, wastewater treatment, and water conservation.
- Professional Training: Water Resources Division staff provide City programs' information to professionals at workshops and conferences.
- Miscellaneous Outreach: Staff develops general stormwater and sewer pollution prevention messages that appear in various newsletters, utility bills, websites, and social media accounts.

The following table provides a summary of all outreach conducted during the 2024 reporting period:

Event Details				Results
Date	**Focus**	**Event Name**	**Organizer**	**Comments**
1/20/2024	Creek Cleanup	Creek Cleanup: Medeiros Parkway	Living Arroyos	40 volunteers. 31 bags of trash removed = 403 gallons of trash removed. You can download trash data from these events by creating an account on https://www.coastalcleanupdata.org/ Photos and stats can be found on Living Arroyos Facebook page
2/1/2024	Careers	Livermore High School Career Fair	Livermore High School	Spoke to approximately 18 students about WRD-related careers, passed out Bayworks career guide information, and passed out water bottles
2/3/2024	Creek Cleanup	Creek Cleanup: Adopt a Creek Spot Site 9 @ Heather Lane	Living Arroyos	25 volunteers. 8 bags of trash removed = 104 gallons of trash removed. You can download trash data from these events by creating an account on https://www.coastalcleanupdata.org/ Photos and stats can be found on Living Arroyos Facebook page
2/8/2024	Pollution Prevention	LVJUSD Science Odessey	Livermore Valley Joint Unified School District	50 visitors to the booth 8 students received awards
3/16-18/2024	General, Careers, Pollution Prevention	Alameda County Science and Engineering Fair	Lead Coordinator – Dublin-San Ramon Services District	502 registered students presented a total of 376 projects
3/23/2024	General	Nature Storytime	Library / Livermore Area Recreation and Park District (LARPD)	Nature Storytime, Sat., 3/23/24, 2-3pm, Sycamore Grove Park (5049 Arroyo Rd.). Children. Enjoy a water-themed story time then explore the creek with a Ranger..
4/6/2024	Creek Cleanup	Creek Cleanup: Stanley Reach	Living Arroyos	26 volunteers. 16 bags of trash removed = 208 gallons of trash removed. You can download trash data from these events by creating an account on https://www.coastalcleanupdata.org/ Photos and stats can be found on Living Arroyos Facebook page

Event Details				Results
Date	**Focus**	**Event Name**	**Organizer**	**Comments**
4/6-7/2024	Conservation, IPM	[Bringing Back the Natives Garden Tour]	Bringing Back the Natives Garden Tour	543 viewers on Saturday. 398 viewers on Sunday. Source Control provided 100 each of: Most Wanted Bugs in Your Garden (OWOW) Non-toxic Pest Control Recipes (ACCWP) Less Toxic Products pocket brochure (OWOW)
4/24/2024	Pollution Prevention	Sandia National Labs Earth Day	Sandia National Labs	SC set up a booth and provided brochures and information on pollution prevention. Approximately 60 people visited the booth during the event.
4/27/2024	Med Disposal	Drug Take-Back Event	Livermore Police Department	355 lbs. collected
5/18/2024	Creek Cleanup	Creek Cleanup: Robertson Park	Living Arroyos	30 volunteers. 11 bags of trash removed = 140 gallons of trash removed. You can download trash data from these events by creating an account on https://www.coastalcleanupdata.org/ Photos and stats can be found on Living Arroyos Facebook page
6/1/2024	General	Del Valle 101	Library/LARPD	Del Valle 101, June 1, 11 a.m., Civic Center Library Storytime Room. All Ages. Learn about the amenities available at Del Valle Regional Park. From boating to hiking to camping and more, there is lots of outdoor fun to be had at this beautiful park.
6/13/2024	Pollution Prevention	[Livermore Farmers Market]	Livermore Downtown, Inc. (LDI)	Brought the storm drain model, provided brochures, and spoke to residents about pollution prevention. Approximately 50 people visited the booth.
7/5/2024	General	Nature Storytime	Library/LARPD	Nature Storytime, Fri. July 5, 10 a.m., Sycamore Grove Park (5049 Arroyo Rd.). Children. Enjoy a water-themed story time then explore the creek with a Ranger.

Event Details				Results
Date	**Focus**	**Event Name**	**Organizer**	**Comments**
7/31/2024	General	Fun in the Park with LARPD - Water Play	Library	Children's water play day at the May Nissen Park; stormwater coloring books made available for kids to take home.
8/1-30/2024	General	Water Quality Month	Library	Library set up a display of informational materials, giveaways, and books to celebrate Water Quality Month.
9/7/2024	General	Nature Storytime	Library/LARPD	Nature Storytime, Fri. July 5, 10 a.m., Sycamore Grove Park (5049 Arroyo Rd.). Children. Enjoy a water-themed story time then explore the creek with a Ranger.
9/7/2024	Creek Cleanup	Livermore Community Service Day: Creek Cleanup at Stanley Reach	Living Arroyos/City of Livermore	14 volunteers placed straw mulch to help prevent erosion Photos and stats can be found on Living Arroyos Facebook page
9/12/2024	Pollution Prevention	Field Trip to City Hall	City Manager's Office	2 classes with 25-26 students and 1 teacher per class (approximately 52 total) Marilyn Ave school STEAM Academy came for a tour of City Hall, the library, and the Police Department. While they were in City Hall, they played the "Protect the Bay" game, played the "Where Does it Go" bean bag toss game, and received Clean Water Program coloring books and pencils.
9/14/2024	Storm Drains	Science in Stockman's Park	Quest Science Center	Donated storm drain accordion brochure, I Am Ready coloring books, and crayons for the "Weather Wonders" themed event. Approximately 40 adults and 15 kids visited the booth.

Event Details				Results
Date	**Focus**	**Event Name**	**Organizer**	**Comments**
9/16-22/2024	Pollution Prevention	Pollution Prevention Week	Water Resources Division (WRD)	Social media postings regarding pollution prevention Three separate social media posts during the week, each posted on Facebook, Instagram, X (Twitter), and Nextdoor
9/19/2024	Pollution Prevention	Key to the City - Water Resources Division presentation and tour	WRD	18 people participated in Key to the City Night at WRD and were provided with verbal education and multiple pamphlets/brochures/flyers/freebies on both stormwater and wastewater topics
9/21/2024	Creek Cleanup	Coastal Clean-Up Day (Creeks to Bay Day)	Living Arroyos	172 volunteers and 1,480 pounds of trash removed from 10 cleanup sites. You can download trash data from these events by creating an account on https://www.coastalcleanupdata.org/ Photos and stats can be found on Living Arroyos Facebook page
9/27/2024	Pollution Prevention	Field Trip to City Hall	City Manager's Office	4 classes with 25-26 students and 1 teacher per class (approximately 104 total) Joe Mitchell School came for a tour of City Hall, the library, and the Police Department. While they were in City Hall, they played the "Protect the Bay" game, played the "Where Does it Go" bean bag toss game, and received Clean Water Program coloring books and pencils.
10/7-15/2024	Careers	Water Professionals Appreciation Week Proclamation	WRD	Presented at WRD All-staff meeting on 10/2/24 by the Mayor and City Manager

Event Details				Results
Date	**Focus**	**Event Name**	**Organizer**	**Comments**
10/19/2024	Flooding	Flood Preparedness Open House	Zone 7	Engineering Division had a booth to share flood insurance information and storm safety tips. WRD provided multiple giveaways including coloring/activity books, crayons, bookmarks, seed packets, and various pamphlets. An estimated 100 people visited the booth.
10/26/2024	Med Disposal	Drug Take-Back Event	Livermore Police Department	355 lbs. collected
11/16/2024	Creek Cleanup	Creek Clean up - Arroyo Las Positas	Living Arroyos	33 volunteers removed 750 gallons of trash removed. You can download trash data from these events by creating an account on https://www.coastalcleanupdata.org/ Photos and stats can be found on Living Arroyos Facebook page
12/7/2024	Creek Cleanup	Creek Clean up - Arroyo Las Positas	Living Arroyos	34 volunteers removed 715 gallons of trash removed. You can download trash data from these events by creating an account on https://www.coastalcleanupdata.org/ Photos and stats can be found on Living Arroyos Facebook page

Miscellaneous Outreach

In addition to in-person programs and events, the City of Livermore promotes pollution prevention through (1) websites, (2) utility billing messages and inserts, (3) newsletters, and (4) social media.

Websites

The City of Livermore administers or contributes content to multiple websites that have messaging related to wastewater and stormwater, including preventing pollution, properly disposing of household waste, reducing garden runoff, and general information about local watersheds.

- **City of Livermore website (www.livermoreca.gov)**
- **Livermore Sanitation website (www.livermoresanitation.com)**
- **Livermore Recycles website (www.livermorerecycles.org)**

- **Tri-Valley Waterwise website (www.trivalleywaterwise.com)**
- **Living Arroyos website (www.livingarroyos.org / www.trivalleycreeks.org)**
- **Alameda Creek Watershed Forum (www.acwforum.org)**

Utility Billing Messages

The City of Livermore issues monthly bills to its non-residential sewer service customers. Each of these bills is printed with messages which regularly focus pollution prevention activities such as proper disposal of hazardous waste and reporting storm drain pollution.

The below table lists the messages that were included during the 2024 reporting year.

Pollution Prevention Messages on Non-Residential Sewer Service Bills

Month	2024 Messages
Jan	Commercial activity can cause polluted water to enter the storm drain system and harm our waterways. All businesses can implement common sense best management practices to reduce or eliminate their contribution to stormwater pollution. Learn what your business can do at www.livermoreca.gov/stormwater-smp
Feb	Many commonly used pesticides can be harmful to people and the environment. Learn how to use less-toxic pest prevention methods at your business by visiting www.ourwaterourworld.org
Mar	Disposable wipes that are labeled “flushable” can cause toilet back-ups and clog the sewer system, resulting in costly clean-ups for your home or business. Remember to throw all used wipes away in your garbage cart or bin instead. Learn more at www.flush3p.org
Apr	Have you ever wondered what happens to the water that goes down your drain? Take a virtual tour of the Livermore Water Reclamation Plant to find out! Visit www.livermoreca.gov/wrd-tour to watch today.
May	On May 11, 2020, the Livermore City Council approved a five-year rate schedule for sewer service charges. New rates will go into effect on July 1, 2024, and will be reflected on your August sewer bill. Visit www.livermoreca.gov/wastewater-rates or call (925) 960-4330 for more information.

Jun	Did you know fluorescent light bulbs and tubes cannot be placed in curbside garbage carts or bins? These lights contain small amounts of mercury, which can pose a serious risk to human and environmental health. Visit www.resource.stopwaste.org to find nearby locations where you can safely recycle your fluorescent bulbs.
Jul	Help keep our streams and creeks clean! Wash equipment and vehicles in a designated and/or covered area where wash water is properly plumbed to the sewer. A City of Livermore wastewater discharge permit is required for this activity. Learn more at www.LivermoreCA.gov/WRD-Permits
Aug	On May 11, 2020, the Livermore City Council approved a five-year rate schedule for sewer service charges. New rates went into effect on July 1, 2024, and are reflected on this month's sewer bill. Visit www.livermoreca.gov/wastewater-rates or call (925) 960-4320 for more information.
Sep	Sweep paved areas and pick up litter around storm drains frequently to prevent flooding and pollution. Remember to clean out storm drains annually before it rains to prevent them from clogging.
Oct	Do you have leftover hazardous materials like chemicals, paint, or pesticides that need to be disposed of? Drop off them off at the Livermore Hazardous Waste Facility, located at 5584 Ribera Street. Learn more at www.stopwaste.org
Nov	Pouring fats, oil, & grease (FOG) down sinks can cause backups & clogged pipes. Protect your home or business from plumbing issues by putting small amounts of solid FOG (less than a cup) in your organics cart or bin. Larger amounts & liquid FOG can be dropped off at a Household Hazardous Waste Facility. Visit www.stopwaste.org for facility hours/locations.
Dec	Show your customers that your company cares about the environment by becoming a California Green Business! Along with receiving statewide recognition, businesses often discover that green business practices lead to lower utility bills. Visit www.greenbusinessca.org to learn more.

Pollution Prevention Messages in Solid Waste Service Bills

The City of Livermore contracts its solid waste services through Livermore Sanitation, who include inserts and quarterly newsletters with their bills. These inserts often include information related to pollution prevention and were created in collaboration with the City.

The below table lists the messages that were included during the 2024 reporting year.

Date	Bill Type	Article Topic & Link to Bill Insert
January 2024	Single-Family Residential Quarterly Newsletter	Hazardous Waste Disposal
March 2024	Commercial Business Quarterly Newsletter	Hazardous Waste Disposal for Businesses
April 2024	Single-Family Residential Quarterly Newsletter	Proper Waste Disposal and Pollution Prevention Tips During Spring Cleaning
April 2024	Single-Family Residential Monthly Bill Insert	Integrated Pest Management (IPM) and Paint Disposal
May 2024	Commercial Business Monthly Bill Insert	The California Green Business Program
June 2024	Commercial Business Quarterly Newsletter	Alternate Disposal Options for Unwanted Waste* (*PDF removed from website during website update that occurred in Q3 2024 after acquisition of Livermore Sanitation, Inc. by Waste Connections US, Inc.)
July 2024	Single-Family Residential Quarterly Newsletter	Cooking and Motor Oil Disposal / Proper Battery Disposal
October 2024	Single-Family Residential Quarterly Newsletter	Proper Disposal of Food Waste
November 2024	Single-Family Residential Monthly Bill Insert	Fats, Oils, and Grease (FOG) Disposal
December 2024	Commercial and Multi-Family Quarterly Newsletter	Proper Disposal of Food Waste

Social Media

The City of Livermore administers or contributes content to nine different social media accounts that post messages related to stormwater, including preventing pollution.

Platform	Account Handles
Facebook	@CityofLivermore, @LivermoreRecycles, @TriValleyCreeks, & @LivingArroyos
X (formerly Twitter)	@CityofLivermore, @LivermorePW, @LivingArroyos
Instagram	@CityofLivermore
Nextdoor	City of Livermore

Special Event Messaging

The Source Control Program places conditions and requirements on Special Use Permits issued for community events during the reporting period and distributed the "Food Vendor Operations Best Management Practices" brochure to food vendors. The Source Control conditions and requirements ensure the following: (1) food vendors properly disposing of their used cooking oil and wastewater, (2) event coordinators pick up any litter/debris after the events, and (3) the City of Livermore Streets Section properly sweep the streets after the events.

7. Pollutants of Concern Source Reduction Evaluation

Criteria Used to Evaluate Mercury Control Effectiveness

Evaluating the effectiveness of pollution prevention efforts is a difficult task, especially in the area of very low-level pollutants such as mercury. The LWRP has high and consistent removal efficiency rates with regards to mercury, copper, and cyanide. Additionally, the LWRP's effluent consistently meets water quality objectives for all pollutants. Therefore, evaluating effectiveness by examining effluent data is not an effective tool. Influent concentrations, however, may be used as a potential effectiveness measurement where possible.

The following table outlines the criteria used to determine the effectiveness of this program. A current update or description of the effectiveness measured is contained in ***"Italics"*** under the "Objective/Goal" column for those items evaluated during this reporting period.

Overall Effectiveness – LWRP Monitoring		
Evaluation Criteria	**Description**	**Objective/Goal**
Influent Monitoring	Review LWRP influent mercury data	Observe a decrease in mercury concentration. However, decreases may be difficult to see due to low levels.
Sludge Monitoring	Review LWRP sludge monitoring data	Observe a decrease in mercury concentration. Also, unlikely to be observed due to low levels.
Source Identification	Review mercury mass-balance to LWRP to evaluate if all major sources have been identified	Develop a Source Identification with a mass balance within 5% of observed LWRP loading.

Overall Effectiveness – Dental Program		
Evaluation Criteria	**Description**	**Objective/Goal**
Number and Percentage of dental offices provided with outreach materials.	Compare total # of facilities provided with information to total # of facilities present	Provide mercury outreach information to 100% of dental offices. Goal achieved with issuance of pollution prevention permits and materials distributed to all dental facilities identified in service area.
Number and percentage of dental offices inspected.	Inspect a subset of the dental facilities each year to review mercury handling practices and distribute BMPs.	Inspect 20% of the dental facilities per year after inception of the outreach effort. *All Dental Facilities will be inspected once during the 2020-2025 permit cycle. Staff is currently in process of completing all inspections by the end of June 2025 as required by its Dental P2 Permit Program.*
Number and percentage of dental offices implementing BMPs.	Review number of facilities implementing BMP from inspection data or other survey activities	All dental facilities covered under a Dental Amalgam Pollution Prevention permit requiring implement
Reduction in mercury discharge from dental offices.	Conduct sampling before & after outreach, self-audit, & inspection to identify any reduction in mercury discharge	Identify 10% reduction in mercury from representative office. *Due to normal monitoring variability/ possibility of persistence of legacy mercury discharges in sewer lateral "joints" or "sags" in the laterals from dental offices.* This has been determined to be an infeasible measurement tool.

Criteria Used to Measure Public Outreach Efforts

The data used to measure the effectiveness of our public outreach include (1) the number of events, presentations, and programs, (2) the number of program participants/booth visitors, (3) post-program evaluations filled out by participants, and (4) pre- and post-program student test results.

Modifications to these proposed criteria to describe the goals of each item more fully have been made in response to prior years' comments from Regional Board staff. A list of potential questions to evaluate outreach events was provided by Board staff and will be used as appropriate for targeted outreach activities. Where appropriate, some activities, such as general outreach/education events aimed at raising general awareness or promoting a combination of messages, will continue to be evaluated based on the number of participants, the number of materials distributed, number of impressions, or other activity-based criteria. Wherever possible, additional criteria to assess the impacts of our efforts on increasing awareness or changing behavior have been added.

The following table outlines the criteria used to determine the effectiveness of this program. A current update or description of the effectiveness measured is contained in ***"Italics"*** under the "Objective/Goal" column for those items evaluated during this reporting period.

Overall Effectiveness – General Outreach / Education		
Evaluation Criteria	**Evaluation Methods and Outreach Goals**	**2024 Progress Towards Outreach Goals**
Number of employee events attended.	Method: Track the number of general outreach events conducted as a measure of program activity Goal: Participate in 3-5 major events or festivals per year. Conduct School outreach as requested.	*Completed.*
Number of employees at employee events.	Method: Measure or estimate the number of employees visiting booths or displays at events. Goal: Maximize the number of people attending event.	The City's Annual Health and Safety Fair has not been reinstated.
Number of community events attended.	Method: Track the number of general outreach events conducted as a measure of program activity.	*Participated in events as detailed in Section 6.0*

	Goal: Participate in 3-5 major events or festivals per year. Conduct School outreach as requested.	
Number of residents at community events.	Method: Measure or estimate the number of employees visiting booths or displays at events. Goal: Maximize the number of people attending events.	*Details in Section 6.0*

Overall Effectiveness – Targeted Residential Programs		
Evaluation Criteria	**Evaluation Methods and Outreach Goals**	**2024 Progress Towards Outreach Goals**
Number of mercury thermometers collected.	Track number of thermometers turned in by residents	Collect and dispose of up to 800 mercury thermometers. Results and evaluation discussed in 2002/2003 Annual Pollution Prevention Report. *This program was concluded in 2018.*
Mercury Thermometer Exchange Program Survey.	Survey of Residents participating in thermometer exchange	Determine how many participants were from our service area, how they found out about the program, why they participated, and were they previously aware of the mercury issue in the bay. A goal will be for 20% of the surveys distributed to be returned. Results and evaluation discussed in 2002/2003 Annual Pollution Prevention Report. *This program was concluded in 2018.*
Pounds of pharmaceutical waste (including, controlled and non-controlled substances) collected at Livermore Drug Take-Back Event.	Track pounds of pharmaceutical waste collected at Livermore Drug Take-Back Event	Since inception of the Take Back Program, the City has collected a total of 11,862.51 lbs. *See table in Section 4.0 for a detailed yearly result of program.*

8. Discussion of Current Efforts and Progress

Mercury/Dental Amalgam

The City of Livermore Water Resources Division implements an effective Dental Mercury Reduction Program which was discussed in “Section 4. Pollutants of Concern and Source Reduction Tasks”. The City’s Dental Mercury Reduction Program is in compliance with 40 CFR Part 441. All dental facilities have been required to install a compliant amalgam separator and submit self-certifications. The City continues to implement and enforce its Dental Amalgam Program.

Tritium

There have been no additional efforts to address tritium discharges by LLNL during this reporting period; however, routine tritium monitoring continues to be performed.

Copper and Cyanide

The City of Livermore Water Resources Division implements an aggressive Source Control Program, which has limited the levels of these potential pollutants in the LWRP influent through enforcement of Federal and local discharge limits. The primary source of copper and cyanide continue to be addressed through the issuance of permit control mechanisms issued to commercial and industrial sources.

Copper

During this reporting period, there were one Notice of Violation issued to East Bay Harley Davidson (vehicle wash rack) for exceeding the 1.00 mg/L total copper local limit. Subsequent resampling demonstrated a return to compliance.

Cyanide

During this reporting period, there were zero Notices of Violation issued for exceeding the 0.04 mg/L total cyanide local limit.

Source Control Section staff ensures that adequate controls or management practices are implemented by local businesses to protect the LWRP. During this reporting period, the concentrations of these pollutants in the LWRP influent were below levels of concern or below method detection limits.

Fats, Oils, and Grease (FOG)

The City of Livermore Water Resources Division implements an effective FOG Control Program which was discussed in “Section 4. Pollutants of Concern and Source Reduction Tasks”. Water Resources Division staff will continue to inspect Food Service Establishments (FSEs) while focusing on pollution prevention issues and verifying that FSEs are meeting FOG Control Program objectives.

Pharmaceuticals

The City of Livermore Water Resources Division will continue to promote the safe and proper disposal of drugs and report the total pounds of prescription drugs collected at Livermore Drug Take-Back Days.

Polychlorinated biphenyls (PCBs)

Source Control Section staff provided City of Livermore Engineering and Building Division staff with the BAPPG Demolition Contractor Brochure that focuses on the proper disposal of PCB-containing caulk and sealants from aged buildings in 2018. In 2019, The City Council of the City of Livermore adopted Resolution No. 2019-093 which was a resolution adopting a program for managing polychlorinated biphenyls in building materials during the demolition and authorizing the City Manager to develop and promulgate policies and requirements to enact the program. Source Control Section staff will continue to identify potential PCBs-containing equipment during Pretreatment and Stormwater inspections and continue to review sampling data from permitted industrial and commercial users.

Additional Efforts

The City of Livermore is part of the East Bay Dischargers Authority and was issued Order No. R2-22-0025 (NPDES Permit No. CA0038008) for the Livermore Water Reclamation Plant on July 13, 2022. The City is also a member of the Bay Area Clean Water Agencies (BACWA). The NPDES permits issued to BACWA members impose requirements for PCBs that are most efficiently fulfilled as a group. Please see the attached BACWA letter submitted to the San Francisco Regional Water Quality Control Board on January 13, 2025. This letter provides a summary of the actions implemented to address Receiving Water Quality Monitoring, TMDL/SSO Support, Mercury and PCBs Watershed Permit Support, and Implementation of Copper Action Plans. In addition, the Bay Area Pollution Prevention Group (BAPPG), a committee of BACWA, completed its 2024 Annual Report, which can be found at https://bacwa.org/document/2024-bappg-annual-report/.

9. Effectiveness Evaluation

Pollution Prevention activities were dedicated towards fulfilling requests for presentations, special events, and plant tours. The tables contained in “Section 7 - Pollutants of Concern Source Reduction Evaluation”, as well as the discussion below, provides a basic summary of the effectiveness of the major tasks conducted to date.

Source Identification Efforts

LWRP Influent Loading

The review of historic influent mercury concentrations and loading was successful in identifying an average loading to be used in mass-balance calculations. Using the 1997-

2001 data produced results within 5% of previous estimates; however, the current estimates are based on much better site-specific data.

Domestic/Residential Sources

Our efforts to quantify the domestic mercury contribution were effective in determining a good estimate of about 66% of the influent mercury loading being attributed to residential sources. The calculations were based on a comprehensive domestic trunk line sampling conducted by Source Control staff in conjunction with the recalculation of LWRP local limits. The calculated loading seems to be consistent with the domestic contribution found by other agencies and will be useful in determining the relative contributions of other sources.

Lawrence Livermore National Laboratory

Our past efforts to quantify LLNL mercury loadings to the LWRP were successful, indicating that LLNL comprises about 14% of our influent loading based on the 1999 influent baseline data. No additional efforts to quantify LLNL's mercury loadings were conducted during this reporting period.

Source Control Staff Training

During this reporting period, staff attended training sessions held at the California Water Environment Association (CWEA) P3S conference in addition to training events sponsored by the Alameda Countywide Clean Water Program (ACCWP) and Bay Area Clean Water Agencies (BACWA).

Regional Efforts

Our efforts to provide leadership and contributions to the CWEA, BACWA, and BAPPG will continue.

10. Future Tasks and Schedule

The following table contains a status update to the list of the major tasks included in the prior year's report. Detailed task descriptions are included in "Section 4 - Pollutants of Concern and Source Reduction Tasks". Additional tasks may be undertaken as they are identified or needed. An update on the progress and any changes to the timeline will be discussed in future reports.

Task	Target Completion Date
Mercury and Silver:	
Help BAPPG/RWQCB Board Staff define “baseline” mercury program	Complete
Meet with LLNL Staff to review current/historical mercury use	Complete
Evaluate plumbing/trap cleaning opportunities at LLNL	Complete
Review the need to reduce the LLNL “internal” mercury discharge limit and identify current mercury discharge sources	Complete
Conduct targeted outreach to LLNL staff as necessary if current sources are identified	Ongoing
Identify and sample representative Dental Facilities	Complete
Perform Dental Facility site visits/inspections	Ongoing
Re-permit/permit Dental Facilities	Ongoing
Mail BAPPG outreach materials to Dental Facilities	Complete
Update the GIS Layer for Dental Facilities with and without amalgam separators	Ongoing
Review Valley Memorial Hospital sampling data/collect additional samples if necessary	Complete
Disseminate Alameda Countywide Clean Water Program’s *Mercury Lamp Best Management Practices* Hand-out to business during General Pretreatment and Stormwater Inspections	Ongoing
Follow-up with commercial and industrial violators through the Pretreatment Program	As Needed
Review mercury data for other commercial and industrial sources	Ongoing
Update the GIS layer for permitted facilities, including Photo Processors, Vehicle Wash Racks, General, Categorical and Significant Industrial Users	Ongoing
Disseminate BAPPG’s Demolition Contractor Brochure	Ongoing

Task	Target Completion Date
Mercury and Silver (continued):	
Support SB 633 Mercury Products Ban	Complete
Provide City Thermometer Take-Back Program	Complete
Copper and Cyanide:	
Follow-up with commercial and industrial violators through the Pretreatment Program	Ongoing
Review copper and cyanide data for other commercial and industrial sources	Ongoing
Update the GIS layer for permitted facilities, including Photo Processors, Vehicle Wash Racks, General, Categorical and Significant Industrial Users	Ongoing
Fats, Oils and Grease (FOG):	
Perform grease trap, Big Dipper and Trapzilla inspections once every three years at Food Service Establishments (FSEs) in FOG Program	Ongoing
Perform semi-annual grease interceptor inspections at Food Service Establishments (FSEs) in FOG Program	Ongoing
Update the GIS layer for Food Service Establishments	Ongoing
FOG Campaign for Water Resource Division's vehicles	Ongoing
Pharmaceuticals:	
Support SB 1014 Safe Medication Management	Complete
Disseminate City's *Safe Medicine Disposal* Hand-out to residents at Livermore Drug Take-Back Days	Ongoing
Task	**Target Completion Date**
Polychlorinated Biphenyls (PCB's):	
Identify potential PCBs-containing equipment during Pretreatment and Stormwater Inspections	Ongoing
Follow-up with commercial and industrial violators through the Pretreatment Program	As needed
Review PCB data for other commercial and industrial sources	Ongoing
Participate on Alameda Countywide Clean Water Program's "PCB Reduction Strategy Workgroup" to help identify properties that possess the potential to have PCBs or legacy PCB contamination on site	Complete

Implement management of PCBs with Demolition Permits by June 30, 2019	Complete
Task	**Target Completion Date**
Water Resources Division (WRD) Environmental Education Program:	
Revise/Mail *School Program Brochure* and courtesy letter to Schools	Complete
Perform classroom presentations and plant tours	Ongoing
Develop *Pollution Prevention Teaching Tool* for classroom presentations and Sewer Science Labs	Complete
Develop *Where Does Our Water Go Poster* for classroom presentations and Sewer Science Labs	Complete
Develop/Maintain WRD Web Page (including mercury, copper, FOG, "flushable wipes", pharmaceutical and pesticide outreach)	Ongoing
Task	**Target Completion Date**
Water Resources Division (WRD) Environmental Education Program (continued):	
Develop/Post WRD Water and Sewer Bill messages (including mercury, copper, FOG, "flushable wipes", pharmaceutical, pesticide, triclosan and plastic microbead outreach)	Ongoing
Develop WRD Services Brochure	Complete
Update LWRP Process Signs	Complete
Develop LWRP Video	Complete
Disseminate *Think Before You Flush* Brochure regarding proper disposal of FOG, "flushable wipes", pharmaceutical and household hazardous waste.	Ongoing
Disseminate other mercury, copper, FOG, "flushable wipes", pharmaceutical and pesticide literature at outreach events	Ongoing

Attachment

BACWA Pollution Prevention Program
Submittal Letter to San Francisco Regional Water Quality Control Board – January 13, 2025

January 13, 2025

Eileen White, Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, 14th Floor
Oakland, CA 94612

VIA EMAIL: Eileen.White@Waterboards.ca.gov

Subject: NPDES Permit Requirements for Receiving Water Quality Monitoring, TMDL/SSO Support, Mercury and PCBs Watershed Permit Support, and Implementation of Copper Action Plans

Dear Eileen White:

I am writing on behalf of the Bay Area Clean Water Agencies (BACWA) and its members that own and operate publicly-owned treatment works (POTWs) and that have National Pollutant Discharge Elimination System (NPDES) permits to discharge to San Francisco Bay Area waters. The NPDES permits issued to these agencies impose some requirements that are most efficiently fulfilled as a group. The purpose of this letter is to report on behalf of BACWA members that those requirements are being met, including permit provisions related to: (A) Receiving Water Quality Monitoring; (B) Support for the RMP for supplemental monitoring of constituents of emerging concern; (C) Mercury and PCBs Watershed Permit Support; (D) Cyanide Action Plan; (E) Copper Action Plan; (F) Nutrient Watershed Permit Support; and (G) Total Maximum Daily Load Support.

A. Receiving Water Quality Monitoring

Various NPDES permits require that the permittees support the Regional Monitoring Program for Water Quality in the San Francisco Estuary (RMP), administered by the San Francisco Estuary Institute (SFEI), and established by San Francisco Bay Regional Water Quality Control Board (Regional Water Board) Resolution 92-043, adopted April 15, 1992. BACWA members have and continue to fulfill this requirement by participating in and providing funding to the RMP. A letter from SFEI, dated December 30, 2024, confirming BACWA member agencies' contributions to the RMP, is attached for reference.

B. Support for Monitoring of Constituents of Emerging Concern

Individual NPDES permits as issued or as amended by Order R2-2021-0028 require POTWs to provide supplemental funding to the RMP to support additional studies for constituents of emerging concern. POTWs that made supplemental contributions to the RMP per this requirement are listed in the attached letter from SFEI dated December 30, 2024.

In addition to the special studies supported by these supplemental funds (listed below), the priorities of the RMP have been migrating away from legacy contaminants in favor of CECs. The RMP will continue to evaluate the status of legacy contaminants in all matrices, and CECs are being added based on the results of an extensive review of the RMP's Status and Trends (S&T) Program. As of 2024, the following CECs have been added to the S&T Program: PFAS (water, sediment, prey fish, sport fish, bird eggs, marine mammals), bisphenols (water, sediment), and organophosphate esters (water).

Supplemental fees fully or partially funded the following projects in 2024 (dollar amounts were budgeted for 2024):

- Tire and roadway contaminants in wet season Bay water (Year 3; $50k)
- Organophosphate esters, Bisphenols, and other plastic additives in Wastewater ($95.4k)
- PFAS Synthesis and Strategy ($107k)
- PFAS in Bay Water using the TOP Assay ($67.2k)
- Nontargeted analysis of SF Bay Fish (Year 1, $23k)

Several other RMP studies conducted in 2024 were related to CECs but were not specifically supported by supplemental funding from wastewater agencies: Stormwater CECs Monitoring and Modeling ($300k), Land Feature Datasets for Modeling CECs ($20k), and Microplastics in Stormwater Monitoring Pilot Year 1 ($78.1k). Reports on emerging and legacy contaminants published in 2024 included the following:

- Dougherty, J., et al. *Ethoxylated Surfactants in San Francisco Bay Water, Urban Stormwater Runoff, and Wastewater: Summary Report for Water Quality Managers*. SFEI Contribution No. 1202. San Francisco Estuary Institute, Richmond, CA, 2024. https://www.sfei.org/documents/ethoxylated-surfactants-san-francisco-bay-water-urban-stormwater-runoff-and-municipal
- Lin, D., et al. "Residential Wastewater as a Major Source of Per- and Polyfluoroalkyl Substances to Municipal Wastewater." *ACS EST Water*, October 12, 2024. https://doi.org/10.1021/acsestwater.4c00507
- Mahony, A., et al. *Investigation of quaternary ammonium compounds (QACs) in wastewater effluent, influent, biosolids, and environmental matrices in San Francisco Bay.* SFEI Contribution No. 1196. San Francisco Estuary Institute, Richmond, CA, 2024. https://www.sfei.org/documents/investigation-quaternary-ammonium-compounds-qacs-wastewater-effluent-influent-biosolids
- San Francisco Estuary Institute (SFEI). *The Pulse of the Bay*. San Francisco Estuary Institute: Richmond, California, 2024. SFEI Contribution No. 1219. https://www.sfei.org/documents/pulse-bay-contaminants-emerging-concern

C. Mercury and PCBs Watershed Permit Support

The Mercury and PCBs Watershed Permit (NPDES Permit CA0038849) was most recently reissued as Order R2-2022-0038 with an effective date of February 1, 2023. The Mercury and PCBs Watershed Permit requires source control and risk reduction activities by permittees.

In 2024, BACWA's Bay Area Pollution Prevention Group (BAPPG) continued to reach out to dental assistant and dental hygienist students to educate them about proper amalgam management and disposal. This campaign reached approximately 150 students and instructors through in-person visits to the following institutions:

- San José City College (two visits)
- Foothill College, Los Altos
- Santa Rosa Junior College
- College of Marin, Novato
- City College of San Francisco

The instructors have come to rely on these annual visits and have incorporated BAPPG's program into their instructional calendar. Further, this is a relevant audience for other messages, such as wipes and pharmaceutical disposal.

The BAPPG-hosted website Baywise.org was updated in 2024 and contains pollution prevention guidance for dental offices at https://baywise.org/business-resources/pollution-prevention-guidance-for-dental-offices.

The Mercury and PCBs Watershed Permit requires that permittees implement or participate in programs to reduce mercury and PCBs-related risks to humans from the consumption of San Francisco Bay and Sacramento-San Joaquin River Delta fish. In 2024, BACWA conducted planning activities for risk reduction work to be conducted during the remainder of the permit term (2025-2028). BACWA is currently exploring opportunities to fund data collection activities related to the development of subsistence fishing water quality objectives for San Francisco Bay. A draft fish consumption survey questionnaire was completed in 2024 and is available at https://www.sfei.org/projects/consumption-survey-questionnaire-san-francisco-bay-subsistence-fishers. In 2025, BACWA will coordinate with the Water Board and SFEI to provide funding for pilot testing of this survey questionnaire by community-based organizations.

RMP mercury and PCBs sampling in 2024 included ongoing monitoring in three watersheds around the region to further develop calibration data for the Watershed Dynamic Model. Six storms were monitored in this effort. Additionally, the RMP funded PCB sampling both upstream and downstream of the former General Electric Plant in two watershed tributaries to the San Leandro Bay. The two sub-watersheds have been identified as highly polluted in previous RMP sampling efforts. The RMP's Status and Trends Monitoring Program monitors mercury, PCBs, and other contaminants in sport fish on a five-year cycle. Sport fish collection was successfully completed in 2024, and the samples will be processed and analyzed in spring 2025. Data are provided in the following reports:

- Gilbreath, A.; McKee, L.; Heberger, M; and Moran, K. *Sources, Pathways, and Loadings Strategy: 2024 Update*. Regional Monitoring Program for Water Quality in San Francisco Bay, Contribution No. 1189. San Francisco Estuary Institute, Richmond, California, 2024. https://www.sfei.org/documents/rmp-sources-pathways-and-loadings-strategy-2024-update
- Cho, Y.M., et al. *Study of Historic Loading and Spatial Distribution of Polychlorinated Biphenyls (PCBs) using Passive Sampling Devices (PSDs) in the Steinberger Slough and Redwood Creek Complex in San Francisco Bay, California, USA*. SFEI Contribution No. 1223. San Francisco Estuary Institute: Richmond, CA, 2024. https://www.sfei.org/documents/study-historic-loading-and-spatial-distribution-polychlorinated-biphenyls-pcbs-using

D. Cyanide Action Plan

As part of the site-specific objective (SSO) for cyanide, NPDES dischargers are required to calculate the 3-event rolling average of total cyanide concentrations in each segment of the Bay, based on RMP data. In 2024, RMP scientists tabulated results from the cyanide sampling completed during the 2023 water cruise. The results are available in the report listed below below:

- Trinh, M. *2023 Update to Cyanide Rolling Average.* San Francisco Estuary Institute: Richmond, California, 2025. https://www.sfei.org/documents/2023-update-cyanide-rolling-average

The 2023 sample results indicate that ambient cyanide concentrations continue to be below the trigger level of 1.0 µg/L in all five segments of the Bay. The next round of sampling is scheduled for summer 2025.

E. Copper Action Plan

The copper action plan contained in many Bay Area POTW permits requires permittees to implement a plan to reduce copper discharges, conduct studies to reduce copper pollutant impact uncertainties, and implement additional measures should the three-year rolling mean in various parts of the Bay exceed site-specific concentration triggers. In 2024, RMP scientists tabulated results from the copper sampling completed during the 2023 water cruise. The results are available in the report listed below:

- Trinh, M. *2023 Update to Copper Rolling Average.* San Francisco Estuary Institute: Richmond, California, 2025. https://www.sfei.org/documents/2023-update-copper-rolling-average

Results indicate that ambient copper concentrations are below the respective trigger levels for all five segments of the Bay. The next round of sampling is scheduled for summer 2025.

The BAPPG-hosted website Baywise.org contains resources for plumbers that focus on the key messages pertaining to copper control: use of ASTM B813 flux, and other best management practices to reduce pipe corrosion. Outreach materials are available at https://baywise.org/business-resources/pollution-prevention-guidance-for-plumbers/

F. Nutrient Watershed Permit Compliance

The Regional Water Board reissued the Nutrient Watershed Permit (NPDES Permit CA0038873) in July 2024 with an effective date of October 1, 2024. On this date, the 2024 Nutrient Watershed Permit (Order R2-2024-0013) replaced the 2019 Watershed Permit (Order R2-2019-0017). Through a nutrient surcharge levied on permittees, BACWA is funding compliance with the following provisions of the 2019 and 2024 Nutrient Watershed Permits on behalf of its members:

- **Group Annual Reporting** (2019 and 2024 Nutrient Watershed Permits) – On February 1, 2024, BACWA submitted the 2023 Group Annual Report on behalf of permittees. The 2023 Group Annual Report covered the period October 2022 - September 2023 and is available online at https://bacwa.org/document/group-annual-report-2024-02-01/. The next Group Annual Report is being prepared per updated requirements in the reissued 2024 Nutrient Watershed Permit, which requires progress reports towards meeting the permit's final effluent limitations for total inorganic nitrogen. The next Group Annual Report will be submitted to the Regional Water Board by the due date of April 1, 2025.

- **Nature-Based Solutions for Nutrient Removal** (2019 Nutrient Watershed Permit only) – Final reports for Phase 1 and Phase 2 of this special study were finalized in June 2023, as required by the 2019 Permit. In 2024, Phase 3 concept designs and cost estimates were completed by SFEI and HDR for Delta Diablo, Fairfield-Suisun Sewer District, and the City of San José. This work utilized remaining funds from the two previous phases and was submitted to the Regional Water Board on September 30, 2024. Facility acceptance letters were submitted to the Water Board and are available upon request. A report featuring case studies of constructed treatment wetlands used by five BACWA member agencies was also provided to the Water Board. All phases of the work, including case studies and the Phase 3 concept designs and cost estimates completed in 2024, are available online at https://bacwa.org/document-category/2nd-watershed-permit-studies/.

- **Monitoring, Modeling, and Subembayment Studies** (2019 and 2024 Nutrient Watershed Permits) – In 2024, BACWA continued to provide financial support for monitoring, modeling and subembayment studies conducted per the San Francisco Bay Nutrient Management Strategy, which is managed by SFEI. BACWA is providing a total of $2,200,000 to SFEI in Fiscal Year 2025, as required by the 2019 and 2024 Nutrient Watershed Permits. BACWA also submits an annual science plan on behalf of dischargers, and the science plan for Fiscal Year 2024 was submitted to the Regional Water Board in advance of the due date of February 1, 2024. Per the reissued 2024 Nutrient Watershed Permit, the next update of the science plan will be submitted to the Regional Water Board by the due date of June 1, 2025.

- **Regional Planning to Reduce Total Inorganic Nitrogen Loads** (2024 Nutrient Watershed Permit only) **–** The reissued 2024 Nutrient Watershed Permit requires completion of a report describing regionwide planning efforts to meet the permit's final effluent limitations. BACWA intends to complete this task on behalf of applicable member agencies (i.e., those listed in Table 4 of R2-2024-0013), beginning with completion of a scoping plan due to the Regional Water Board by July 1, 2025. BACWA has retained consulting firm HDR, Inc., to assist with preparation of the scoping plan.

G. Total Maximum Daily Load Support

Some POTW permits previously included a requirement that permittees report to the Regional Water Board any actions taken in support of Total Maximum Daily Loads (TMDLs) for 303(d) listed pollutants. Support for these efforts has been provided largely through support of the RMP.

In 2014, the RMP convened a Selenium Strategy Team and developed a Selenium Strategy in the Multi-Year Plan. The multi-year plan involves monitoring for selenium in water, clams, and sturgeon to support the North Bay selenium TMDL. Sampling for selenium was paused in 2024 for a review of the data collected through 2023. In addition, RMP funds were budgeted to find analytical partners able to analyze small tissue sample masses associated with non-lethal sampling techniques used for sampling sturgeon muscle tissue. Sampling is expected to resume in 2026.

Please contact me if you have any questions about the information contained in this letter.

Respectfully Submitted,

Lorien Fono, Ph.D., P.E.
Executive Director
Bay Area Clean Water Agencies

Encl: SFEI Letter regarding RMP Participation, December 30, 2024

cc: Bill Johnson, Chief, Wastewater Control and Enforcement Division, Regional Water Board
Xavier Fernandez, Chief, Planning and TMDL Division, Regional Water Board
BACWA Executive Board
Meg Herston, BACWA Permits Committee Chair

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December 30, 2024

Lorien Fono
Executive Director
Bay Area Clean Water Agencies
PO Box 24055, MS 702
Oakland, CA 94623

Dear Dr. Fono,

The Regional Monitoring Program for Water Quality in San Francisco Bay (RMP) is the only comprehensive environmental monitoring program to measure pollutants and trends in the Bay. The RMP, which began in 1993, is a successful partnership of scientists, government, municipalities, and industry to understand and improve the health of the Bay.

The goal of the RMP is to collect data and communicate information about water quality in the San Francisco Estuary in support of management decisions. The accomplishments of the RMP are summarized in the RMP Update and the Pulse. The Pulse was published in October 2024. Current and past Pulses can be downloaded here; RMP Updates can be found here.

In 2024, 35 wastewater treatment facilities collectively contributed the full amount of the core RMP program costs assigned to publicly owned treatment works ($1,903,741; see Table 1 for a complete list of agencies). The process used to determine the core fees for each participant group are outlined in the Program Charter: http://www.sfei.org/documents/charter-regional-monitoring-program-water-quality-san-francisco-bay.

In December 2021, the Water Board adopted Order R2-2021-0028, which requires publicly owned treatment works to provide supplemental funding to the RMP to support additional studies for constituents of emerging concern (CECs). In 2024, 35 wastewater treatment facilities made supplemental contributions to the Program under Order R2-2021-0028 and similar requirements found in reissued individual NPDES permits ($339,994 see Table 1).

Your support is essential to the RMP. Through these financial contributions, the RMP is able to conduct regional monitoring to assess the cumulative impact of multiple sources of pollutants to the Bay, including the growing number of emerging contaminants that are a concern. We thank you and your members for the support and look forward to serving you in 2025.

Sincerely,

Amy E Kleckner

Amy Kleckner
RMP Manager

Table 1

Wastewater Treatment Facilities Contributing to the RMP in 2024 in FY24

POTW Dischargers	Core RMP Fees	Supplemental Fees for CECs Studies(1)
American Canyon, City of	YES	YES
Benicia, City of	YES	YES
Burlingame, City of	YES	YES
Calistoga, City of	YES	YES
Central Contra Costa Sanitary District	YES	YES
Central Marin Sanitation Agency	YES	YES
Delta Diablo	YES	YES
East Bay Dischargers Authority	YES	YES
East Bay Municipal Utilities District	YES	YES
Fairfield-Suisun Sewer District	YES	YES
Las Gallinas Valley Sanitary District	YES	YES
Marin County (Tiburon), Sanitary District No. 5 of	YES	YES
Millbrae, City of	YES	YES
Mt. View Sanitary District	YES	YES
Napa Sanitation District	YES	YES
Novato Sanitary District	YES	YES
Palo Alto, City of	YES	YES
Petaluma, City of	YES	YES
Pinole/Hercules, City of	YES	YES
Rodeo Sanitary District	YES	YES
San Francisco, City and County of, San Francisco International Airport	YES	YES
San Francisco (Southeast Plant), City and County of	YES	YES
San José-Santa Clara Regional Wastewater Facility	YES	YES
San Mateo, City of	YES	YES
Sausalito - Marin City Sanitary District	YES	YES
Sewerage Agency of Southern Marin	YES	YES
Silicon Valley Clean Water	YES	YES
Sonoma Valley County Sanitary District	YES	YES
South San Francisco and San Bruno, Cities of	YES	YES
St. Helena, City of	YES	YES
Sunnyvale, City of	YES	YES
Treasure Island Development Authority	YES	YES
Vallejo Flood and Wastewater District	YES	YES
West County Agency	YES	YES
Yountville, Town of	YES	YES

(1) NPDES Permit CA0037885 (Port Costa Wastewater Treatment Plant) and NPDES CA0037427 (Paradise Cove Treatment Plant) also require supplemental funding of CECs studies, but the requested contribution in 2024 was $0 due to these agencies' small size.