



Discharge Regulations & Future Impacts on the RWF

Transportation and Environment Committee

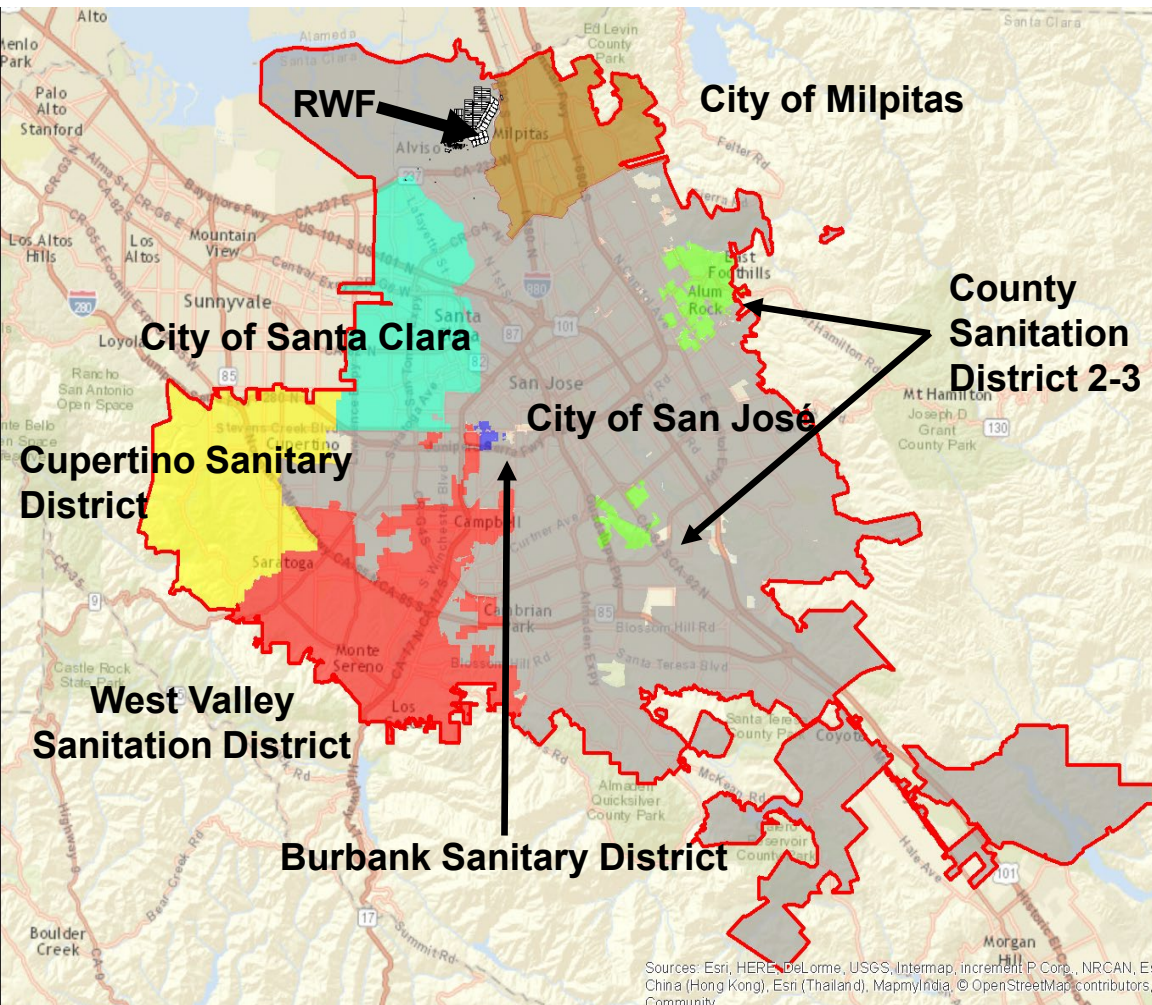
May 2, 2022

*Eric Dunlavey
Jason Nettleton
Jennifer Voccola Brown*



**San José-
Santa Clara
Regional
Wastewater
Facility**

Regional Wastewater Facility



- Operating since 1956
- Largest advanced wastewater facility in West
 - 167 MGD capacity
 - 2,600-acre site
- Serves
 - 1.5 million people
 - 17,000 businesses
 - 8 cities & County areas
- Subject to multiple permits

Regulatory Permits: Water & Air Quality

Permit	Permit Effective	Expected Reissuance	Regulator
Air Emissions Permits			
Title V – Federal Air Operating Permit	March 2017	May 2022	EPA/BAAQMD
Permit to Operate	July 2021	Renewed Annually	BAAQMD
Wastewater Discharge Permits			
RWF NPDES Permit	April 2020	April 2025	SF Water Board
Nutrients NPDES Permit for POTWs	July 2019	July 2024	SF Water Board
Mercury and PCBs NPDES Permit for POTWs	December 2017	December 2022	SF Water Board

New/Updated BAAQMD Regulations

- Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants
- Regulation 11, Rule 18 – Reduction of Risk From Air Toxic Emissions at Existing Facilities
- Regulation 13, Rule 4 – Sewage Treatment and Anaerobic Digestion



BAAQMD Engagement

- Work Group Formed During Adoption of Regulation 2, Rule 5
 - Bay Area Clean Water Agencies (BACWA)
 - BAAQMD Management
 - Reports to BAAQMD Board of Directors
- Project/Permit Experience
 - Source Test Group
 - Enforcement
 - Engineering (permits)



Regulatory Permits: Water & Air Quality

Permit	Permit Effective	Expected Reissuance	Regulator
Air Emissions Permits			
Title V – Federal Air Operating Permit	March 2017	May 2022	EPA/BAAQMD
Permit to Operate	July 2021	Renewed Annually	BAAQMD
Wastewater Discharge Permits			
RWF NPDES Permit	April 2020	April 2025	SF Water Board
Nutrients NPDES Permit for POTWs	July 2019	July 2024	SF Water Board
Mercury and PCBs NPDES Permit for POTWs	December 2017	December 2022	SF Water Board

Updated Regulations: Nutrient Limits

- Nitrogen Limits 2024
- Bay science studies will inform need for further reductions
- Proactive monitoring and collaborative engagement by staff



Potential Regulations: CECs

Constituents of Emerging Concern



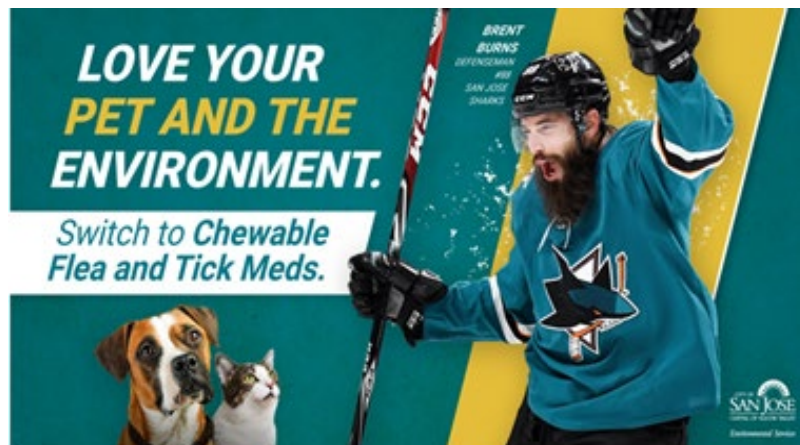
PFAS

Forever chemicals

Broad uses

Ubiquitous

Image from:
mn-net.com



SB 1383 Regulation Integration into Operations

- Sludge Dewatering Facility 2025
- Biosolids Transition Strategy has co-benefits
 1. Odor Management
 2. Positions RWF better for diversion to meet SB 1383



Conclusion – Ongoing Actions

- **Continue Tracking** Regulations and Legislation
 - Positions taken are science-based and practical
- **Engaging** with Regulators
 - Establish stronger connection with BAAQMD Leadership
 - Maintain relationship with Water Board
- **Building Flexibility** into Capital Projects
 - Adapting where/when needed as regulations change