EBDA

EAST BAY DISCHARGERS AUTHORITY
2651 Grant Avenue
San Lorenzo, CA 94580-1841
(510) 278-5910
FAX (510) 278-6547

A Joint Powers Public Agency

COMMISSION MEETING AGENDA

Thursday, February 20, 2025

4:00 PM

Oro Loma Sanitary District Boardroom
2655 Grant Avenue, San Lorenzo, CA

Teleconference link: https://us02web.zoom.us/j/89796898677
Call-in: 1(669) 900-6833 and enter Webinar ID number: 897 9689 8677

1. **Call to Order**
2. **Pledge of Allegiance**
3. **Roll Call**
4. **Public Forum**

C O N S E N T C A L E N D A R

MOTION **5. Commission Meeting Minutes of January 16, 2025**

6. List of Disbursements for January 2025 – See Item No. FM4

7. Treasurer's Report for January 2025 – See Item No. FM5

R E G U L A R C A L E N D A R

INFORMATION **8. General Manager's Report**
(The General Manager will report on EBDA issues.)

INFORMATION **9. Report from the Managers Advisory Committee**
(The General Manager will report on Managers Advisory Committee activities.)

INFORMATION **10. Report from the Financial Management Committee**
(The General Manager will report on the meeting.)

INFORMATION **11. Report from the Operations and Maintenance Committee**
(The Operations & Maintenance and General Managers will report on the meeting.)

INFORMATION **12. Report from the Regulatory Affairs Committee**
(The General Manager will report on the meeting.)

MOTION **13. Motion Authorizing the General Manager to Execute a Professional Services Agreement with H.T. Harvey and Associates for a Biosolids Suitability Assessment in the Amount of $40,275 – See Item No. RA8**
(The Commission will consider the motion.)

INFORMATION **14. Items from the Commission and Staff**
(The Commission and staff may address items of general interest.)

15. Adjournment

Any member of the public may address the Commission at the commencement of the meeting on any matter within the jurisdiction of the Commission. This should not relate to any item on the agenda. It is the policy of the Authority that each person addressing the Commission limit their presentation to three minutes. Non-English speakers using a translator will have a time limit of six minutes. Any member of the public desiring to provide comments to the Commission on an agenda item should do so at the time the item is considered. It is the policy of the Authority that oral comments be limited to three minutes per individual or ten minutes for an organization. Speaker's cards will be available in the Boardroom and are to be completed prior to speaking.

In compliance with the Americans with Disabilities Act of 1990, if you need special assistance to participate in an Authority meeting, or you need a copy of the agenda, or the agenda packet, in an appropriate alternative format, please contact the Administration Manager at the EBDA office at (510) 278-5910 or juanita@ebda.org. Notification of at least 48 hours prior to the meeting or time when services are needed will assist the Authority staff in assuring that reasonable arrangements can be made to provide accessibility to the meeting or service.

In compliance with SB 343, related writings of open session items are available for public inspection at East Bay Dischargers Authority, 2651 Grant Avenue, San Lorenzo, CA 94580. For your convenience, agenda items are posted on the East Bay Dischargers Authority website located at http://www.ebda.org.

Next Scheduled Commission meeting is
Thursday, March 20, 2025 at 4:00 pm

GLOSSARY OF ACRONYMS

ACWA	Association of California Water Agencies
AQPI	Advanced Quantitative Precipitation Information
AMP	Asset Management Plan
ANPRM	Advanced Notice of Proposed Rulemaking
BAAQMD	Bay Area Air Quality Management District
BACC	Bay Area Chemical Consortium
BACWA	Bay Area Clean Water Agencies
BPA	Basin Plan Amendment
BCDC	Bay Conservation and Development Commission
BOD	Biochemical Oxygen Demand
CARB	California Air Resources Board
CASA	California Association of Sanitation Agencies
CBOD	Carbonaceous Biochemical Oxygen Demand
CDFA	CA Department of Food & Agriculture
CEC	Compound of Emerging Concern
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CMMS	Computerized Maintenance Management System
COH	City of Hayward
CPUC	California Public Utilities Commission
CSL	City of San Leandro
CTR	California Toxics Rule
CVCWA	Central Valley Clean Water Association
CVSAN	Castro Valley Sanitary District
CWA	Clean Water Act
CWEA	CA Water Environment Association
DO	Dissolved Oxygen
DPR	Department of Pesticide Regulation
DSRSD	Dublin San Ramon Services District
DTSC	Department of Toxic Substances Control
EBDA	East Bay Dischargers Authority
EBRPD	East Bay Regional Park District
EIS/EIR	Environmental Impact Statement/Report
EPA	United States Environmental Protection Agency
FOG	Fats, Oils and Grease
GASB	Government Accounting Standards Board
HEPS	Hayward Effluent Pump Station
JPA	Joint Powers Agreement
LAVWMA	Livermore-Amador Valley Water Management Agency
LOCC	League of California Cities
MAC	Managers Advisory Committee
MCC	Motor Control Center
MCL	Maximum Contaminant Level
MDF	Marina Dechlorination Facility
MG	Million Gallons
MGD	Million Gallons per Day
MMP	Mandatory Minimum Penalty
MOU	Memorandum of Understanding
MSS	Mixed Sea Salt
N	Nitrogen
NACWA	National Association of Clean Water Agencies
NBS	Nature-Based Solutions
NGO	Non-Governmental Organization
NOX	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPS	Non-Point Source

GLOSSARY OF ACRONYMS

O&M	Operations & Maintenance
OLEPS	Oro Loma Effluent Pump Station
OLSD	Oro Loma Sanitary District
OMB	Office of Management and Budget
P	Phosphorous
PAHs	Polynuclear Aromatic Hydrocarbons
PCBs	Polychlorinated Biphenyls
PLC	Programmable Logic Controller
PFAS	Per and Polyfluoroalkyl Substances
POTW	Publicly Owned Treatment Works
QA/QC	Quality Assurance / Quality Control
Region IX	Western Region of EPA (CA, AZ, NV & HI)
ReNUWIt	Re-Inventing the Nation's Urban Water Infrastructure Engineering Research Center
RFP	Request For Proposals
RFQ	Request For Qualifications
RMP	Regional Monitoring Program
RO	Reverse Osmosis
RRF	Renewal and Replacement Fund
RWB	Regional Water Board
RWQCB	Regional Water Quality Control Board
SBS	Sodium Bisulfite
SCADA	Supervisory Control and Data Acquisition
SCAP	Southern California Alliance of POTWs
SEP	Supplementary Environmental Project
SFEI	San Francisco Estuary Institute
SFEP	San Francisco Estuary Partnership
SLEPS	San Leandro Effluent Pump Station
SRF	State Revolving Fund
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflow
SWRCB	State Water Resources Control Board
TDS	Total Dissolved Solids
TIN	Total Inorganic Nitrogen
TMDL	Total Maximum Daily Load
TP	Total Phosphorus
TRC	Total Residual Chlorine
TSO	Time Schedule Order
TSS	Total Suspended Solids
UEPS	Union Effluent Pump Station
USD	Union Sanitary District
UV	Ultraviolet Treatment
VFD	Variable Frequency Drive
VOCs	Volatile Organic Compounds
WAS	Waste Activated Sludge
WDR	Waste Discharge Requirements
WEF	Water Environment Federation
WET	Whole Effluent Toxicity or Waste Extraction Test
WIN	Water Infrastructure Network
WLA	Waste Load Allocation (point sources)
WPCF	Water Pollution Control Facility
WQBEL	Water Quality Based Effluent Limitation
WQS	Water Quality Standards
WRDA	Water Resource Development Act
WRF	Water Research Foundation
WWTP	Wastewater Treatment Plant
WWWIFA	Water and Wastewater Infrastructure Financing Agency

CONSENT CALENDAR

Consent calendar items are typically routine in nature and are considered for approval by the Commission with a single action. The Commission may remove items from the Consent Calendar for discussion. Items on the Consent Calendar are deemed to have been read by title. Members of the public who wish to comment on Consent Calendar items may do so during Public Forum.

Item No. 5 Commission Meeting Minutes of January 16, 2025
Item No. 6 List of Disbursements for January 2025 – See Item No. FM4
Item No. 7 Treasurer's Report for January 2025 – See Item No. FM5

Recommendation
Approve Consent Calendar

ITEM NO. 5 COMMISSION MEETING MINUTES OF JANUARY 16, 2025

1. Call to Order

Chair Young called the meeting to order at 4:00 P.M. on Thursday, January 16, 2025 at the Oro Loma Sanitary District, 2655 Grant Avenue, San Lorenzo, CA 94580.

2. Pledge of Allegiance

3. Roll Call

Present:	Jennifer Toy	Union Sanitary District
	Ralph Johnson	Castro Valley Sanitary District
	Bryan Azevedo	City of San Leandro
	Angela Andrews	City of Hayward
	Shelia Young	Oro Loma Sanitary District
Absent:	None	
Attendees:	Jacqueline Zipkin	East Bay Dischargers Authority
	Howard Cin	East Bay Dischargers Authority
	Juanita Villasenor	East Bay Dischargers Authority
	Erica Gonzalez	Legal Counsel
	Alex Ameri	City of Hayward
	David Donovan	City of Hayward
	Hayes Morehouse	City of San Leandro
	Jimmy Dang	Oro Loma Sanitary District
	Paul Eldredge	Union Sanitary District
	Roland Williams	Castro Valley Sanitary District
	Kateryna Pryor	Foster & Foster, Inc

4. Public Forum

No members of the public were present.

C O N S E N T C A L E N D A R

5. Commission Meeting Minutes of December 19, 2024
6. List of Disbursements for December 2024
7. Treasurer's Report for December 2024

Commissioner Andrews moved to approve the Consent Calendar. The motion was seconded by Commissioner Azevedo and carried with the following vote:

Ayes:	Toy, Johnson, Azevedo, Andrews, Young
Noes:	None
Absent:	None
Abstain:	None

R E G U L A R C A L E N D A R

8. Resolution Fixing the Employer Contribution Under the Public Employees' Medical and Hospital Care Act at an Equal Amount for Employees and Annuitants and Adding Premium Reimbursements for Eligible Participants

The GM introduced Kateryna Pryor of Foster & Foster, Inc, the Authority's contracted actuary. Commissioner Andrews moved to approve the item. The motion was seconded by Commissioner Toy and carried with the following vote:

Ayes:	Toy, Johnson, Azevedo, Andrews, Young
Noes:	None
Absent:	None
Abstain:	None

9. General Manager's Report

The General Manager (GM) provided status updates on the Authority's transition to Fremont Bank and the EBDA branded apparel order. Due to the President's Day holiday, the Financial Management and Operations & Maintenance committees must reschedule February meetings. The GM discussed a draft risk assessment on the potential human health risks associated with PFAS released by the Environmental Protection Agency.

10. Report from the Managers Advisory Committee (MAC)

The General Manager provided an update on the activities of the MAC, including guest speakers from the San Francisco Public Utilities Commission (SFPUC). The SFPUC is launching an effort to seek funding for wastewater infrastructure and nutrient projects.

11. Report from the Financial Management Committee

The GM reported on the January 13 meeting of the Financial Management Committee. The Committee recommended approval of the revisions to the Purchasing and Internal Controls and the Fraud Prevention policies. Lastly, the Committee supported the changes in other post-employment benefits.

12. Motion to Approve Revisions to the Internal Controls and Fraud Prevention Policy

Commissioner Johnson moved to approve the item. The motion was seconded by Commissioner Andrews and carried with the following vote:

Ayes:	Toy, Johnson, Azevedo, Andrews, Young
Noes:	None
Absent:	None
Abstain:	None

13. Motion to Approve Revisions to the Purchasing Policy

Commissioner Andrews moved to approve the item. The motion was seconded by Commissioner Johnson and carried with the following vote:

Ayes: Toy, Johnson, Azevedo, Andrews, Young
Noes: None
Absent: None
Abstain: None

14. Report from the Operations and Maintenance Committee

The Operations and Maintenance (O&M) Manager and GM reported on the January 13, 2025 meeting and O&M activities. The O&M Manager provided updates on ongoing projects, including the Hayward Effluent Pump Station (HEPS) Effluent Pump Replacement Project and station control upgrades at the Oro Loma Effluent Pump Station (OLEPS). The General Manager provided updates on the Cargill brine project and the Advanced Quantitative Precipitation Information (AQPI) Program.

15. Items from Commission and Staff

Commissioner Andrews announced a toiletry drive for the Los Angeles wildfire victims taking place on January 25 at Southland Mall in Hayward. Commissioner Azevedo invited everyone to a Martin Luther King Day clean-up at Halcyon Park in San Leandro.

16. Adjournment

Chair Young adjourned the meeting at 4:37 pm.

Jacqueline Zipkin
General Manager

ITEM NO. 8 GENERAL MANAGER'S REPORT
The General Manager will discuss items of interest to EBDA.

ITEM NO. 9 REPORT FROM THE MANAGERS ADVISORY COMMITTEE

MANAGERS ADVISORY COMMITTEE
AGENDA

Monday, February 3, 2025
2:00 pm

Via Zoom

1. **Nutrients**
   a. **Modeling Trading Opportunities – welcome Stanford guests**
   b. **Compliance Milestone Reporting**
2. **Biosolids Check-in**
3. **AI Information Sharing – how are you using/thinking about AI at your agency?**
4. **FY 25/26 EBDA Budget Special Study Brainstorm**
5. **EBDA Commission Agenda**
6. **Managers Information Sharing**

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A Joint Powers Public Agency

ITEM NO. 10

FINANCIAL MANAGEMENT COMMITTEE AGENDA

Tuesday, February 18, 2025

12:30 PM

East Bay Dischargers Authority
2651 Grant Avenue, San Lorenzo, CA

Committee Members: Andrews (Chair); Toy

FM1. Call to Order

FM2. Roll Call

FM3. Public Forum

FM4. Disbursements for January 2025
(The Committee will review the List of Disbursements.)

FM5. Treasurer's Reports for January 2025
(The Committee will review the Treasurer's Report.)

FM6. Insurance Program Review
(The Committee will review changes from the Authority's insurance providers.)

FM7. State Controller's Special District Financial Transactions Report Fiscal Year 2023/2024
(The Committee will review the report submitted to the State Controller's Office.)

FM8. Adjournment

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Next Scheduled Financial Management Committee is
Monday, March 17, 2025

ITEM NO. FM4 DISBURSEMENTS FOR JANUARY 2025

Disbursements for the month of January totaled $427,637.21.

Reviewed and Approved by:

Angela Andrews, Chair Date
Financial Management Committee

Jacqueline T. Zipkin Date
Treasurer

EAST BAY DISCHARGERS AUTHORITY
List of Disbursements
January 2025

Check #	Payment Date	Invoice #	Vendor Name	Description	Invoice Amount	Disbursement Amount
26694	01/31/2025	042238D	PUMP REPAIR SERVICE	HEPS EFFLUENT PUMP REPLACEMENT	75,498.00	112,313.00
26694	01/31/2025	042239D	PUMP REPAIR SERVICE	HEPS EFFLUENT PUMP REPLACEMENT	36,815.00	
26671	01/15/2025	7399	CSRMA	POOLED LIABILITY PROGRAM RENEWAL	45,765.00	45,765.00
26696	01/31/2025	003153	UNION SANITARY DISTRICT	UEPS O&M, PG&E, FM MAINTENANCE - NOV	38,139.82	38,139.82
26693	01/31/2025	7047	ORO LOMA SANITARY DISTRICT	OLEPS O&M, ADMIN BUILDING, SKYWEST - OCT	35,106.15	35,106.15
26687	01/31/2025	398716	CITY OF SAN LEANDRO	MDF O&M, EFFLUENT MONITORING, FM MAINTENANCE - NOV	21,816.58	21,816.58
26695	01/31/2025	17923	REGIONAL GOVERNMENT SERVICES	MANAGEMENT AND ADMINISTRATIVE SERVICES	8,425.65	8,425.65
26673	01/15/2025	222411	MEYERS NAVE	LEGAL SERVICES - BRINE PROJECT	8,002.00	8,277.00
26673	01/15/2025	222412	MEYERS NAVE	LEGAL SERVICES - NUTRIENTS PERMIT	275.00	
26676	01/15/2025	13287	REDWOOD PUBLIC LAW, LLP	LEGAL SERVICES	7,739.00	7,739.00
26682	01/31/2025	58198	CALCON	FORCE MAIN VAULT UPGRADES	5,633.66	7,314.06
26682	01/31/2025	58196	CALCON	SKYWEST REPLACED VALVE BOX RADIO	1,020.30	
26682	01/31/2025	58197	CALCON	HEPS PLC PROGRAMMING	660.10	
26691	01/31/2025	34608	FOSTER & FOSTER	ACTUARIAL CONSULTING SERVICES	5,000.00	5,000.00
26679	01/15/2025	4246-0445-5568-7627	U.S. BANK	PURCHASING CARD EXPENSES	2,976.63	2,976.63
26681	01/31/2025	0125-24	BEECHER ENGINEERING, INC	ELECTRICAL ENGINEERING SERVICES	1,680.00	1,680.00
26686	01/31/2025	52205707	CITY OF HAYWARD	EMPLOYEE BENEFIT PROGRAMS - JAN	1,377.18	1,377.18
26688	01/31/2025	51734	CRANE TECH INC	OLEPS 15-TON BRIDGE CRANE ANNUAL INSPECTION & CERTIFICATION	1,075.00	1,075.00
26683	01/31/2025	725243	CALTEST	LAB TESTING SERVICES	949.72	949.72
26678	01/15/2025	489415	SOUTHERN COUNTIES LUBRICANTS LLC	HEPS PUMP OIL	449.34	748.89
26678	01/15/2025	489168	SOUTHERN COUNTIES LUBRICANTS LLC	HEPS PUMP OIL	299.55	
26680	01/31/2025	2963612	ALLIANT INSURANCE	POLLUTION LIABILITY INSURANCE RENEWAL	722.26	722.26
26667	01/15/2025	726194	CALTEST	LAB TESTING SERVICES	677.32	677.32
26689	01/31/2025	4167	DAVISON SYSTEMS, LLC	CMMS SUBSCRIPTION RENEWAL	500.00	500.00
26685	01/31/2025	8449	CAYUGA INFORMATION SYSTEMS	IT SERVICES	498.75	498.75
26669	01/15/2025	OCT-DEC 2024	CHARLES V. WEIR	QUARTERLY HEALTH PREMIUM REIMBURSEMENT	442.74	442.74
26672	01/15/2025	OCT-DEC 2024	KARL D. ROYER	QUARTERLY HEALTH PREMIUM REIMBURSEMENT	442.74	442.74
26675	01/15/2025	37292574	PITNEY BOWES INC	DIGITAL MAILING SYSTEM POSTAGE ACCOUNT	300.00	300.00
26674	01/15/2025	275770346	ORKIN	MDF PEST CONTROL SERVICE	253.99	253.99
26677	01/15/2025	CD_000999865	RINGCENTRAL INC	DIGITAL PHONE SERVICE	210.24	210.24
26670	01/15/2025	57387	COMPUTER COURAGE	WEBSITE HOSTING	150.00	150.00
26692	01/31/2025	11994	MBC CUSTODIAL SERVICES INC	JANITORIAL SERVICES - DEC	130.00	130.00
26690	01/31/2025	44777800001	EBMUD	ADMIN WATER SERVICE	86.20	86.20
26684	01/31/2025	4275902-CAL	CALTRONICS	COPIER USAGE AND MAINTENANCE	80.19	80.19

EAST BAY DISCHARGERS AUTHORITY
List of Disbursements
January 2025

Check #	Payment Date	Invoice #	Vendor Name	Description	Invoice Amount	Disbursement Amount
26668	01/15/2025	4263117	CALTRONICS	COPIER SUPPLIES SHIPPING	15.00	15.00
					303,213.11	**303,213.11**
				ELECTRONIC PAYMENTS		
	01/31/2025	5105948980-0	PG&E	GAS & ELECTRIC SERVICE	47,064.59	47,064.59
	01/09/2025	10000001773286	CALPERS	HEALTH PREMIUMS - JAN	8,319.94	8,319.94
	01/10/2025	100000017737285	CALPERS	PENSION CONTRIBUTION, CLASSIC 12/16 - 31/2024	5,877.93	5,877.93
	01/21/2025	100000017769767	CALPERS	PENSION CONTRIBUTION, CLASSIC 1/01 - 15/2025	5,877.93	5,877.93
	01/22/2025	6250386	MISSION SQUARE	DEFERRED COMPENSATION CONTRIBUTION 1/15/2025	2,281.89	2,281.89
	01/13/2025	6070631	MISSION SQUARE	DEFERRED COMPENSATION CONTRIBUTION 12/31/2024	2,115.22	2,115.22
	01/23/2025	1002368908	STATE COMPENSATION INSURANCE FUND	WORKERS COMPENSATION PREMIUM - JAN	893.00	893.00
	01/21/2025	51048304397166	AT&T	MDF TELEPHONE SERVICE	403.73	403.73
	01/06/2025	2501212215	INTERMEDIA.NET INC	EMAIL EXCHANGE HOSTING	91.36	91.36
	01/23/2025	6102501442	VERIZON WIRELESS	WIRELESS PHONE SERVICE	63.79	63.79
				TOTAL ELECTRONIC PAYMENTS	**72,989.38**	**72,989.38**
				PAYROLL		
	01/30/2025		ADP, LLC	PAYROLL PERIOD: 1/16-31/2025	26,775.02	26,775.02
	01/14/2025		ADP, LLC	PAYROLL PERIOD: 1/01-15/2025	24,463.02	24,463.02
	01/03/2025		ADP, LLC	PAYROLL FEES, 12/16-31/2024	105.74	105.74
	01/24/2025		ADP, LLC	PAYROLL FEES, 1/01-15/2025	90.94	90.94
				TOTAL PAYROLL	**51,434.72**	**51,434.72**
				TOTAL DISBURSEMENTS	**427,637.21**	**427,637.21**

ITEM NO. FM5 TREASURER'S REPORT FOR JANUARY 2025

The cash balance as of January 31, 2025 is $4,873,352.02. EBDA's LAIF balance is $1,344,893.94, and the average monthly effective yield for January is 4.366%. EBDA's CAMP balance is $1,616,634.34, and CAMP's 7-day yield is 4.52%.

Approval is recommended.

EAST BAY DISCHARGERS AUTHORITY

TREASURER'S REPORT

January 2025

FUND	FUND DESCRIPTION	BEGINNING CASH BALANCE	DEBITS (INCREASE)	CREDITS (DECREASE)	ENDING CASH BALANCE
12	OPERATIONS & MAINTENANCE	$ 1,270,324	$ 1,039,450	$ 289,177	$ 2,020,597
13	PLANNING & SPECIAL STUDIES	$ (310,690)	$ 626,510	$ 275	$ 315,546
14	RECLAMATION O & M (SKYWEST)	$ 64,294	$ -	$ 8,407	$ 55,888
15	BRINE ACCEPTANCE	$ 137,305	$ -	$ 8,825	$ 128,479
31	RENEWAL & REPLACEMENT	$ 2,433,107	$ 40,688	$ 120,954	$ 2,352,842
	TOTALS	$ 3,594,341	$ 1,706,649	$ 427,637	$ 4,873,352
	Ending Balance per STR				$ 4,873,352

Jan-25
2/12/2025

SUPPLEMENTAL TREASURER'S REPORT

DATE	TRANSACTION	RECEIPT	DISBURSEMENT CHECKING	PAYROLL	PAYROLL TRANSFER	LAIF	CAMP	WELLS FARGO CHECKING BALANCE	WELLS FARGO PAYROLL BALANCE	FREMONT CHECKING BALANCE	LAIF BALANCE	CAMP BALANCE	TOTAL CASH
12/31/24	BALANCE							583,270.30	71,350.37	100.00	1,329,432.28	1,610,187.65	3,594,340.60
01/02/25	DIVIDENDS	6,446.69					6,446.69	583,270.30	71,350.37	100.00	1,329,432.28	1,616,634.34	3,600,787.29
01/03/25	DEPOSIT	2,100.00						585,370.30	71,350.37	100.00	1,329,432.28	1,616,634.34	3,602,887.29
01/03/25	PAYROLL FEES			105.74				585,370.30	71,244.63	100.00	1,329,432.28	1,616,634.34	3,602,781.55
01/06/25	ELECTRONIC BILL PAY		91.36					585,278.94	71,244.63	100.00	1,329,432.28	1,616,634.34	3,602,690.19
01/09/25	DEPOSIT - ORO LOMA	374,032.35						959,311.29	71,244.63	100.00	1,329,432.28	1,616,634.34	3,976,722.54
01/09/25	ELECTRONIC BILL PAY		8,319.94					950,991.35	71,244.63	100.00	1,329,432.28	1,616,634.34	3,968,402.60
01/10/25	ELECTRONIC BILL PAY		5,877.93					945,113.42	71,244.63	100.00	1,329,432.28	1,616,634.34	3,962,524.67
01/13/25	DEPOSIT	1,006.20						946,119.62	71,244.63	100.00	1,329,432.28	1,616,634.34	3,963,530.87
01/13/25	ELECTRONIC BILL PAY		2,115.22					944,004.40	71,244.63	100.00	1,329,432.28	1,616,634.34	3,961,415.65
01/14/25	PAYROLL			24,463.02				944,004.40	46,781.61	100.00	1,329,432.28	1,616,634.34	3,936,952.63
01/15/25	DISBURSEMENT		67,998.55					876,005.85	46,781.61	100.00	1,329,432.28	1,616,634.34	3,868,954.08
01/15/25	INTEREST	15,461.66				15,461.66		876,005.85	46,781.61	100.00	1,344,893.94	1,616,634.34	3,884,415.74
01/21/25	DEPOSIT - CSL	130,727.90						1,006,733.75	46,781.61	100.00	1,344,893.94	1,616,634.34	4,015,143.64
01/21/25	ELECTRONIC BILL PAY		403.73					1,006,330.02	46,781.61	100.00	1,344,893.94	1,616,634.34	4,014,739.91
01/21/25	ELECTRONIC BILL PAY		5,877.93					1,000,452.09	46,781.61	100.00	1,344,893.94	1,616,634.34	4,008,861.98
01/22/25	ELECTRONIC BILL PAY		2,281.89					998,170.20	46,781.61	100.00	1,344,893.94	1,616,634.34	4,006,580.09
01/23/25	ELECTRONIC BILL PAY		63.79					998,106.41	46,781.61	100.00	1,344,893.94	1,616,634.34	4,006,516.30
01/23/25	ELECTRONIC BILL PAY		893.00					997,213.41	46,781.61	100.00	1,344,893.94	1,616,634.34	4,005,623.30
01/24/25	PAYROLL FEES			90.94				997,213.41	46,690.67	100.00	1,344,893.94	1,616,634.34	4,005,532.36
01/27/25	DEPOSIT - USD	452,596.54						1,449,809.95	46,690.67	100.00	1,344,893.94	1,616,634.34	4,458,128.90
01/30/25	DEPOSIT - CVSAN	149,296.75						1,599,106.70	46,690.67	100.00	1,344,893.94	1,616,634.34	4,607,425.65
01/30/25	DEPOSIT - LAVWMA	574,980.54						2,174,087.24	46,690.67	100.00	1,344,893.94	1,616,634.34	5,182,406.19
01/30/25	PAYROLL			26,775.02				2,174,087.24	19,915.65	100.00	1,344,893.94	1,616,634.34	5,155,631.17
01/31/25	ELECTRONIC BILL PAY		47,064.59					2,127,022.65	19,915.65	100.00	1,344,893.94	1,616,634.34	5,108,566.58
01/31/25	DISBURSEMENT		235,214.56					1,891,808.09	19,915.65	100.00	1,344,893.94	1,616,634.34	4,873,352.02
	TOTAL	1,706,648.63	376,202.49	51,434.72	-	15,461.66	6,446.69						
	CURRENT BALANCE							1,891,808.09 ①	19,915.65 ②	100.00 ③	1,344,893.94 ④	1,616,634.34 ⑤	4,873,352.02

Reconciliation - 1/31/2025

①	Bank Statement Balance	$ 2,127,292.65
	Less: Outstanding Checks	235,484.56
		$ 1,891,808.09
②	Payroll Bank Statement	$ 19,915.65
③	Fremont Bank	$ 100.00
④	LAIF Statement	$ 1,344,893.94
⑤	CAMP Statement	$ 1,622,883.38
	Less: Accrual Income Dividend	6,249.04
		$ 1,616,634.34

The Supplemental Treasurer's Report is prepared monthly by the General Manager. It also serves as EBDA's cash and investments reconciliation.

ITEM NO. FM6 INSURANCE PROGRAM REVIEW

Recommendation
For the Committee's information only; no action is required.

Strategic Plan Linkage
3. **Financial:** Develop financial strategies and practice sound fiscal management to ensure wise use of ratepayers' resources.
    b. Proactively manage expenditures to stay within adopted budget.

Background
The Authority is a member of the California Sanitation Risk Management Authority JPA (CSRMA). CSRMA offers shared risk and group purchase programs to its members. The shared risk programs, which include Pooled Liability, are member owned and operated. Interest-earning funds are placed on deposit with CSRMA, where they are used to pay claims and related expenses. Funds not spent or reserved are refunded to members through retrospective rating adjustments and dividend payments. In addition, members have access to an array of group purchase programs including primary insurance, auto physical damage, and storage tank programs.

Discussion
Pooled Liability Program (PLP)
The Authority participates in CSRMA's Pooled Liability Program (PLP), which provides members with third-party liability coverage specifically designed to meet the exposures faced by the wastewater industry. The PLP, which renewed on December 31, 2024, provides members with General, Auto, Errors and Omissions, Employment Practices, and Excess Liability coverages. The CSRMA Executive Board approved the renewal with the total coverage limits in the PLP at $25,750,000. The reinsurance agreements now include PFAS and Cyber exclusions. In addition, the CSRMA Board recently implemented the Employment Practices Liability (EPL) Deductible Reduction Incentive Program. Members who meet the eligibility requirements will maintain their EPL deductible at $25,000. Total costs for the PLP program increased by 17.66%, due to many factors including increased exposures, loss development in the PLP, and re/insurance market conditions. While the program premiums increased overall, the cost for individual members varies based on changes in exposure. As shown in the summary table below, EBDA's PLP premium increased for 2025. PLP participants will not receive a dividend this year due to minimum threshold requirements in CSRMA's Dividend Policy & Procedure.

Property Program
The CSRMA Property Program 2024/2025 renewal costs increased by 8.8%. In July 2021, CSRMA implemented a pooled layer for the Property Program funded by program participants in response to the hardening insurance market. Catastrophic events, inflation, and increased costs to rebuild/replace damaged structures are driving property insurance rate increases.

Additional CSRMA Coverage

Additional coverages afforded by CSRMA to the Authority include:

- Public Entity Vehicle Physical Damage Program – Physical damage coverage for the Authority owned vehicle.
- Pollution Liability Program – Third-party pollution legal liability and clean-up for above ground storage tank exposure at OLEPS.
- Public Official Bond Program – Surety bonds for the General and Operations & Maintenance Managers.

Workers' Compensation

The Authority does not participate in the CSRMA Workers' Compensation Program due to the minimum premium requirement of $15,000. Instead, the Authority purchases workers' compensation coverage through the State Compensation Insurance Fund.

The following table summarizes the Authority's insurance costs and increases from last year:

Insurance Program	2025 Cost	Change from 2024
Pooled Liability	$45,765	$7,589
Property	$41,819	$3,407
Public Entity Vehicle Physical Damage	$311	$3
Pollution Liability Program	$722	--
Public Official Bond Program – 3 years	$4,376	--
Workers' Comp	$10,716	$180

ITEM NO. FM7 STATE CONTROLLER'S SPECIAL DISTRICT FINANCIAL TRANSACTIONS REPORT FISCAL YEAR 2023/2024

Recommendation
For the Committee's information only; no action is required.

Strategic Plan Linkage
3. **Financial:** Develop financial strategies and practice sound fiscal management to ensure wise use of ratepayers' resources.

Background
The Special District Financial Transactions Report is required to be submitted each year to the State Controller's Office (SCO) by January 31. The report is prepared in conformance with requirements set by the SCO and submitted electronically.

Discussion
In accordance with the Authority's Audit Policy, Cropper Accountancy, the contract auditor, prepared this year's annual report. Although this report aligns with the Authority's audited financial statements and does not introduce any new information, it is provided for the Committee's review and knowledge of its submission.

SPECIAL DISTRICT FINANCIAL TRANSACTIONS REPORT
COVER PAGE

Special District Name: East Bay Dischargers Authority

Fiscal Year: **2024** ID Number: **12500108500**

Certification:
I hereby certify that, to the best of my knowledge and belief, the report forms fairly reflect the financial transactions of the special district in accordance with the requirements as prescribed by the California State Controller.

Special District Fiscal Officer

Signature	General Manager Title
Jacqueline Zipkin Name (Please Print)	January 24, 2025 Date

Per Government Code section 53891(a), this report is due within seven months after the close of the fiscal year or within the time prescribed by the Controller, whichever is later. The report shall contain underlying data from audited financial statements prepared in accordance with generally accepted accounting principles, if this data is available.

If submitted manually, please complete, sign, and mail this cover page to either address below:

Mailing Address:
Local Government Reporting Section - Special District
Local Government Programs and Services Division
California State Controller's Office
P.O. Box 942850
Sacramento, CA 94250

Express Mailing Address:
Local Government Reporting Section - Special District
Local Government Programs and Services Division
California State Controller's Office
3301 C Street, Suite 740
Sacramento, CA 95816

The Financial Transactions Report was successfully submitted to the State Controller's Office on 1/24/2025 2:47:10 PM

Special District Name: East Bay Dischargers Authority
Special Districts' Financial Transactions Report
General Information

Fiscal Year: 2024

District Mailing Address

Street 1: 2651 Grant Avenue ☐ Has Address Changed?
Street 2:
City: San Lorenzo State: CA Zip: 94580
Email: juanita@ebda.org

Members of the Governing Body

	First Name	M. I.	Last Name	Title
Member 1	Anjali		Lathi	Chair
Member 2	Fred		Simon	Vice-Chair
Member 3	Ralph		Johnson	Commissioner
Member 4	Angela		Andrews	Commissioner
Member 5	Bryan		Azevedo	Commissioner
Member				

District Fiscal Officers

	First Name	M. I.	Last Name	Title	Email
Official 1	Jacqueline	T	Zipkin	General Manager	jzipkin@ebda.org
Officials					

Report Prepared By

First Name: Katy M. I. Last Name: Klamp
Telephone: (925) 932-3860 Email: katy@cropperaccountancy.com

Independent Auditor

Firm Name: Cropper Accountancy Corporation
First Name: John M. I. Last Name: Cropper
Telephone: (925) 932-3860

1. Is this district a component unit of a City, County, or Special District (Choose one)? If “Yes”, answer question 2. ○ Yes ◉ No

2. Is this district a blended component unit (BCU) or a discretely presented component unit (DPCU) of a City, County, or Special District (Choose one)? Refer to the Financial Transactions Report (FTR) instructions for definitions of these terms. If the district is a BCU, answer questions 3 - 5.

○ BCU ○ DPCU

3. Is financial data of this BCU included in the financial statements or Annual Comprehensive Financial Report (ACFR) of a City, County, or Special District (Choose one)?

○ City ○ County ○ Special District

4. In which City, County, or Special District financial statements or ACFR is the financial data of this BCU included?

City name:
County name:
Special District name:

5. Is financial data of this BCU included in the City, County, or Special District FTR (Choose one)? ○ Yes ○ No

6. In preparing the District's financial transactions reports for governmental fund type accounts, which basis of accounting was used? (Choose one):

○ Cash basis ○ Modified cash basis ○ Modified accrual basis ○ Full accrual basis ◉ N/A

7. In preparing the District's financial transactions reports for proprietary fund type accounts (Internal Service Funds and Enterprise Funds), which basis of accounting was used? (Choose one):

○ Cash basis ○ Modified cash basis ○ Modified accrual basis ◉ Full accrual basis ○ N/A

8. In preparing the District's financial transactions reports for fiduciary fund type accounts, which basis of accounting was used? (Choose one):

○ Cash basis ○ Modified cash basis ○ Modified accrual basis ○ Full accrual basis ◉ N/A

Special District Name: East Bay Dischargers Authority
Special Districts' Financial Transactions Report
Sewer Enterprise Fund
Statement of Revenues, Expenses, and Changes in Fund Net Position

Fiscal Year: 2024

	Operating Revenues	
R01.	Service Charges	5,575,112
R02.	Permit and Inspection Fees	
R03.	Connection Fees	
R04.	Standby and Availability Charges	
R05.	Service-Type Assessments	
R06.	Service Penalties	
R07.	Other Operating Revenues	39,094
R08.	**Total Operating Revenues**	$5,614,206
	Operating Expenses	
R09.	Transmission	
R10.	Treatment and Disposal	3,761,939
R11.	Taxes	
R12.	Personnel Services	
R13.	Contractual Services	
R14.	Materials and Supplies	
R15.	General and Administrative Expenses	1,483,781
R16.	Depreciation and Amortization Expenses	912,488
R17.	Other Operating Expenses	
R18.	**Total Operating Expenses**	$6,158,208
R19.	**Operating Income (Loss)**	$-544,002
	Nonoperating Revenues	
R20.	Investment Income	147,603
R21.	Rents, Leases, Concessions, and Royalties	
	Taxes and Assessments	
SD22.	Current Secured and Unsecured (1%)	
SD23.	Voter-Approved Taxes	
SD24.	Pass-through Property Taxes (ABX1 26)	
SD25.	Property Assessments	
SD26.	Special Assessments	
SD27.	Special Taxes	
SD28.	Prior-Year Taxes and Assessments	
SD29.	Penalties and Cost of Delinquent Taxes and Assessments	
	Intergovernmental – Federal	
R30.	Aid for Construction	
R31.	Other Intergovernmental – Federal	271,435
	Intergovernmental – State	
R32.	Aid for Construction	
SD33.	Homeowners Property Tax Relief	
SD34.	Timber Yield	

R35.	In-Lieu Taxes	
R36.	Other Intergovernmental – State	
R37.	Intergovernmental – County	
R38.	Intergovernmental – Other	
R39.	Gain on Disposal of Capital Assets	
R40.	Other Nonoperating Revenues	96,479
R41.	**Total Nonoperating Revenues**	$515,517
	Nonoperating Expenses	
R42.	Interest Expense	
R43.	Loss on Disposal of Capital Assets	420,000
R44.	Other Nonoperating Expenses	348,913
R45.	**Total Nonoperating Expenses**	$768,913
R46.	**Income (Loss) Before Capital Contributions, Transfers, and Special and Extraordinary Items**	$-797,398
	Capital Contributions	
R47.	Federal	
R48.	State	
R49.	Connection Fees (Capital)	
R50.	County	
R51.	Other Government	
R52.	Other Capital Contributions	
R53.	**Total Capital Contributions**	$0
R54.	**Transfers In**	825,241
R55.	**Transfers Out**	-825,241
	Special and Extraordinary Items	
R55.5	Special Item	
R55.6	Extraordinary Item	
R55.7	**Total Special and Extraordinary Items**	$0
R56.	**Change in Net Position**	$-797,398
R57.	**Net Position (Deficit), Beginning of Fiscal Year**	$27,355,753
R58.	**Adjustment**	
R59.	Reason for Adjustment	
R60.	**Net Position (Deficit), End of Fiscal Year**	$26,558,355
	Net Position (Deficit)	
R61.	Net Investment in Capital Assets	23,993,135
R62.	Restricted	0
R63.	Unrestricted	2,565,220
R64.	**Total Net Position (Deficit)**	$26,558,355

Special District Name: East Bay Dischargers Authority
Special Districts' Financial Transactions Report
Statement of Net Position
Proprietary Funds

Fiscal Year: 2024

		Enterprise	Internal Service
	Assets		
	Current Assets		
	Cash and Investments		
R01.	Unrestricted	3,815,396	
R02.	Restricted		
R03.	Accounts Receivable (net)	32,094	
R04.	Taxes Receivable		
R05.	Interest Receivable (net)	21,640	
R05.5	Lease Receivable		
R06.	Due from Other Funds		
R07.	Due from Other Governments	266,321	
R08.	Inventories	153,441	
R09.	Prepaid Items	41,653	
R10.	Other Current Assets 1	2,646	
R11.	Other Current Assets 2		
R12.	Total Current Assets	$4,333,191	$0
	Noncurrent Assets		
R13.	Cash and Investments, Restricted		
R14.	Investments		
R14.5	Lease Receivable		
R15.	Other Loans, Notes, and Contracts Receivable		
	Capital Assets		
R16.	Land	442,339	
R17.	Buildings and Improvements	20,565,243	
R18.	Equipment	905,768	
R18.5	Infrastructure	36,369,660	
R18.6	Lease Assets (Lessee)	6,450	
R19.	Other Intangible Assets – Amortizable		
R20.	Construction in Progress	674,523	
R21.	Intangible Assets – Nonamortizable		
R22.	Other Capital Assets		
R23.	Less: Accumulated Depreciation/Amortization	-34,970,848	
R23.5	Net Pension Asset		
R23.6	Net OPEB Asset		
R24.	Other Noncurrent Assets 1		
R25.	Other Noncurrent Assets 2		
R26.	Total Noncurrent Assets	$23,993,135	$0
R27.	**Total Assets**	$28,326,326	$0
	Deferred Outflows of Resources		

R28.	Related to Pensions	611,194	
R28.5	Related to OPEB	32,294	
R28.6	Related to Debt Refunding		
R29.	Other Deferred Outflows of Resources		
R30.	**Total Deferred Outflows of Resources**	$643,488	$0
R31.	**Total Assets and Deferred Outflows of Resources**	$28,969,814	$0
	Liabilities		
	Current Liabilities		
R32.	Accounts Payable	552,075	
R33.	Contracts and Retainage Payable	105,690	
R34.	Interest Payable		
R35.	Due to Other Funds		
R36.	Due to Other Governments	747,524	
R37.	Deposits and Advances		
R38.	Compensated Absences		
R39.	Long-Term Debt, Due Within One Year	0	0
R40.	Other Long-Term Liabilities, Due Within One Year		
R41.	Other Current Liabilities 1	6,450	
R42.	Other Current Liabilities 2		
R43.	Total Current Liabilities	$1,411,739	$0
	Noncurrent Liabilities		
R44.	Deposits and Advances		
R45.	Compensated Absences	135,426	
R46.	General Obligation Bonds		
R47.	Revenue Bonds		
R48.	Certificates of Participation		
R49.	Other Bonds		
R50.	Loans (Other Long-Term Debt)		
R51.	Notes (Other Long-Term Debt)		
R52.	Other (Other Long-Term Debt)		
R53.	Construction Financing – Federal		
R54.	Construction Financing – State		
R54.5	Lease Liability		
R55.	Lease-Obligations (Purchase Agreements)		
R56.	Net Pension Liability	587,810	
R57.	Net OPEB Liability	5,159	
R58.	Other Noncurrent Liabilities 1		
R59.	Other Noncurrent Liabilities 2		
R60.	Total Noncurrent Liabilities	$728,395	$0
R61.	**Total Liabilities**	$2,140,134	$0
	Deferred Inflows of Resources		
R62.	Related to Pensions	169,506	
R62.5	Related to OPEB	101,819	
R62.6	Related to Debt Refunding		
R62.7	Related to Leases		

R63.	Other Deferred Inflows of Resources		
R64.	**Total Deferred Inflows of Resources**	$271,325	$0
R65.	**Total Liabilities and Deferred Inflows of Resources**	$2,411,459	$0
R66.	**Total Net Position (Deficit)**	$26,558,355	$0
	Net Position (Deficit)		
R67.	Net Investment in Capital Assets	23,993,135	
R68.	Restricted		
R69.	Unrestricted	2,565,220	
R70.	**Total Net Position (Deficit)**	$26,558,355	$0

Special District of East Bay Dischargers Authority
Special District Financial Transactions Report
Footnotes

Fiscal Year: 2024

FORM DESC	FIELD NAME	FOOTNOTES
SewerEnterpriseFund	(R07)OtherOperatingRevenues	Sale of reclaimed water $36,000 Other operating revenue $3,094
SewerEnterpriseFund	(R31)OtherIntergovernmentalFederal	Federal grant managed by the Association of Bay Area Governments (ABAG)
SewerEnterpriseFund	(R40)OtherNonoperatingRevenues	Cargill reimbursements $76,479 Zone 7 brine $20,000
SewerEnterpriseFund	(R44)OtherNonoperatingExpenses	Cargill project costs totaling $76,478 Federal grant expenses of $271,435 Bruce Wolfe memorial $1,000
SewerEnterpriseFund	(R54)TransfersIn	Transfers of capital assets to Operating and Maintenance fund from Renewal and Replacement fund
SewerEnterpriseFund	(R55)TransfersOut	Transfers of capital assets to Operating and Maintenance fund from Renewal and Replacement fund
ProprietaryFunds	(R01)Entpr-Unrestricted	Collections in 2023 were slower, and there were timing issues.
ProprietaryFunds	(R10)Entpr-OtherCurrentAssets1	Deposits
ProprietaryFunds	(R20)Entpr-ConstructioninProgress	2024 had ongoing projects in CIP for operations center and Oro Loma pump station
ProprietaryFunds	(R41)Entpr-OtherCurrentLiabilities1	Current portion of ROU lease liability
ProprietaryFunds	(R43)Entpr-TotalCurrentLiabilities	There was more due to member agencies in 2024 than 2023.

Total Footnote: 11

EAST BAY DISCHARGERS AUTHORITY
2651 Grant Avenue
San Lorenzo, CA 94580-1841
(510) 278-5910
FAX (510) 278-6547

A Joint Powers Public Agency

ITEM NO. 11

OPERATIONS & MAINTENANCE COMMITTEE AGENDA

Wednesday, February 19, 2025

4:00 PM

East Bay Dischargers Authority
2651 Grant Avenue, San Lorenzo, CA

Committee Members: Young (Chair); Azevedo

OM1. Call to Order

OM2. Roll Call

OM3. Public Forum

OM4. EBDA Permit Compliance
(The Committee will be updated on EBDA's NPDES compliance.)

OM5. Status Report
(The Committee will be updated on EBDA's O&M activities.)

OM6. Renewal and Replacement Fund Recap
(The Committee will review the current status of the Authority's Renewal and Replacement Fund projects.)

OM7. Adjournment

Any member of the public may address the Commission at the commencement of the meeting on any matter within the jurisdiction of the Commission. This should not relate to any item on the agenda. It is the policy of the Authority that each person addressing the Commission limit their presentation to three minutes. Non-English speakers using a translator will have a time limit of six minutes. Any member of the public desiring to provide comments to the Commission on an agenda item should do so at the time the item is considered. It is the policy of the Authority that oral comments be limited to three minutes per individual or ten minutes for an organization. Speaker's cards will be available in the Boardroom and are to be completed prior to speaking.

In compliance with the Americans with Disabilities Act of 1990, if you need special assistance to participate in an Authority meeting, or you need a copy of the agenda, or the agenda packet, in an appropriate alternative format, contact Juanita Villasenor at juanita@ebda.org or (510) 278-5910. Notification of at least 48 hours prior to the meeting or time when services are needed will assist the Authority staff in assuring that reasonable arrangements can be made to provide accessibility to the meeting or service.

Agenda Explanation
East Bay Dischargers Authority
O&M Agenda
February 19, 2025

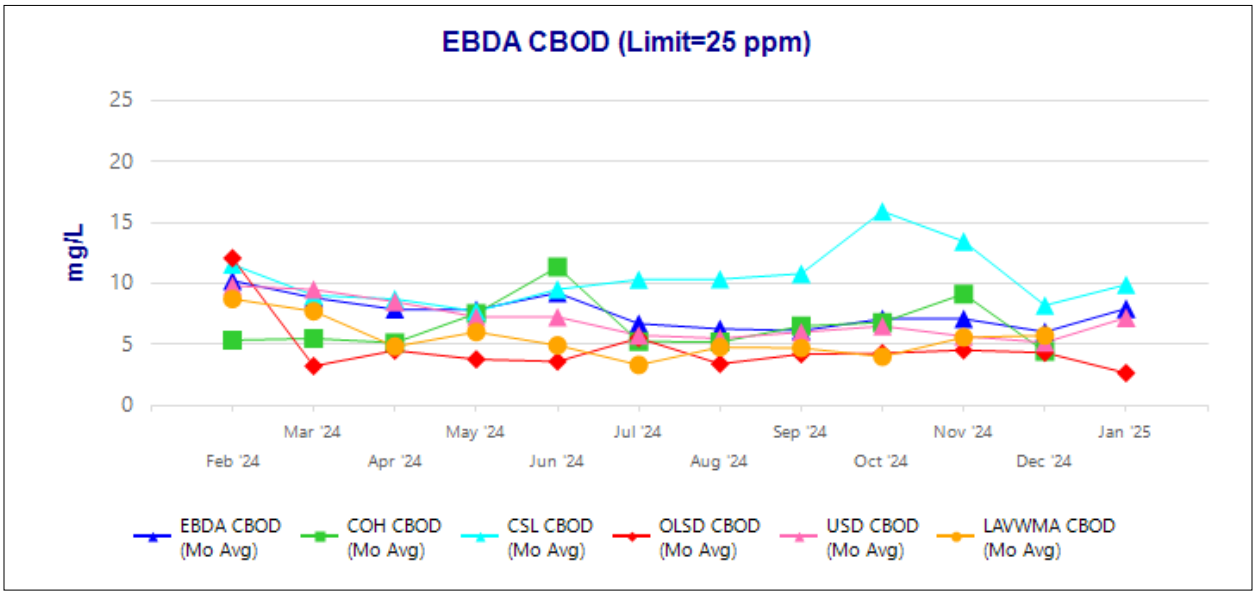
In compliance with SB 343, related writings of open session items are available for public inspection at East Bay Dischargers Authority, 2651 Grant Avenue, San Lorenzo, CA 94580. For your convenience, agenda items are posted on the East Bay Dischargers Authority website located at http://www.ebda.org.

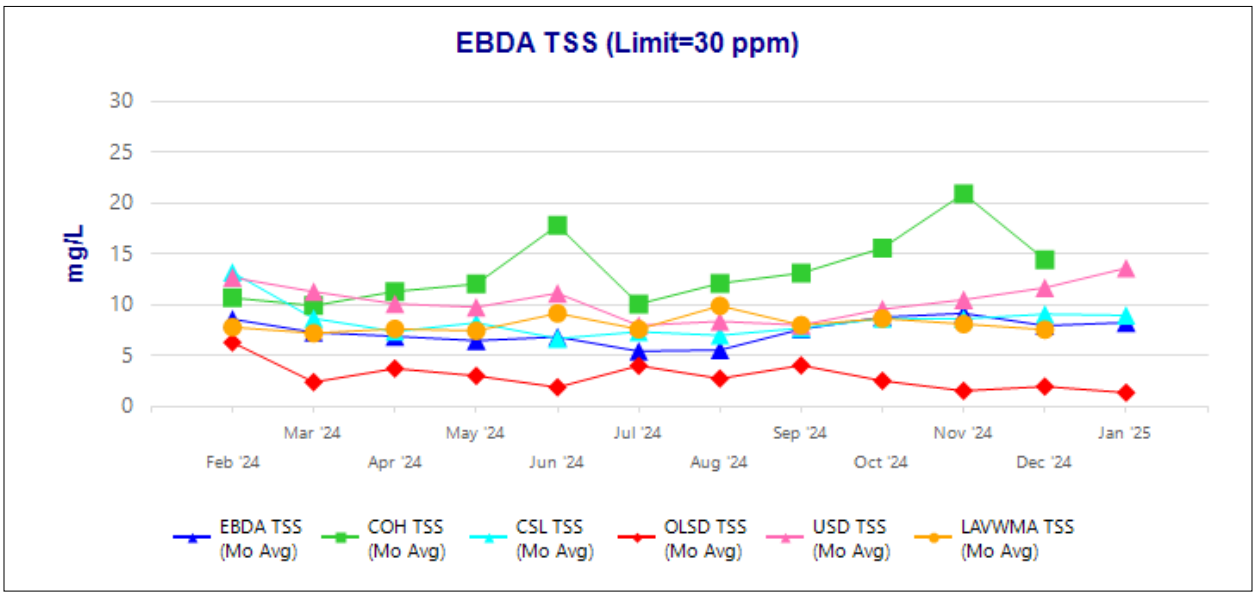
Next Scheduled Operations and Maintenance Committee is Monday, March 17, 2025

ITEM NO. OM4 EBDA PERMIT COMPLIANCE

Recommendation
For the Committee's information only; no action is required.

Discussion
EBDA and its members continued our NPDES compliance in December, and preliminary January data indicates compliance as well. Member Agency CBOD and TSS performance are shown below. A table with bacterial indicators follows.





EBDA Bacterial Indicators

Date	FECAL MPN/ 100mL	ENTERO MPN/ 100mL
Limit (90th Percentile)	1100	1100
Limit (Geomean)	500	280
February 2024 Geomean	**8**	**15**
March 2024 Geomean	**6**	**7**
April 2024 Geomean	**9**	**3**
May 2024 Geomean	**12**	**4**
June 2024 Geomean	**60**	**9**
July 2024 Geomean	**59**	**5**
August 2024 Geomean	**153**	**21**
September 2024 Geomean	**109**	**13**
October 2024 Geomean	**33**	**4**
November 2024 Geomean	**24**	**2**
12/2/2024	23	6
12/3/2024	79	< 2
12/9/2024	2	4
12/10/2024	11	< 2
12/16/2024	< 2	10
12/17/2024	4	2
12/23/2024	2	2
12/24/2024	70	8
12/30/2024	3200	97
12/31/2024	220	8
December 2024 Geomean	**22**	**5**
1/1/2025	NA	13
1/6/2025	33	20
1/7/2025	310	< 2
1/8/2025	79	2
1/13/2025	22	6
1/14/2025	33	< 2
1/15/2025	4	NA
1/20/2025	4	< 2
1/21/2025	7	8
1/27/2025	49	8
1/28/2025	NA	10
January 2025 Geomean	**25**	**5**

ITEM NO. OM5 STATUS REPORT

Union Effluent Pump Station (UEPS)

No change; all equipment is operational.

Hayward Effluent Pump Station (HEPS)

Effluent Pump Replacement Project
On January 20, vibration testing was completed on the two new HEPS pumps. The vibration testing report was sent to the pump manufacturer, and staff is waiting for their response. Both new pumps tested well below the allowable vibration limits, and both have been operating for several weeks without any issues except for an unusual intermittent noise from one of the pumps, which was previously discussed. Once the noise issue is resolved and the pump manufacturer clears both new pumps, work will start on the third new pump.

Oro Loma Effluent Pump Station (OLEPS)

Automatic Transfer Switch Upgrade
Todd Beecher, EBDA's contract electrical engineer, has updated the OLEPS electrical system single line diagrams and completed a design memorandum for two new automatic transfer switches (ATSs) at OLEPS. EBDA staff is in the process of reviewing the design, and then Mr. Beecher will present his recommendations to the MAC. The two new ATSs will improve reliability of the pump station in the event of a power outage. If PG&E power fails, the OLEPS emergency generator is the primary source of backup power. Currently, if the emergency generator fails to start, operators can manually switch to the secondary source of backup power from OLSD. The installation of two new ATSs will allow the switch from primary to secondary backup to occur automatically. This ATS work is being completed as part of Phase 2 of the OLEPS Electrical Upgrades. Replacement of the breakers and refurbishment of the Main Switchboard was completed in Phase 1 of the OLEPS Electrical Upgrades last year.

Skywest Pump Station

Recycled Water Production
During the month of January 2025, the Skywest Recycled Water System operated for two days and produced 1.12 million gallons of recycled water.

Marina Dechlorination Facility (MDF)

No change; all equipment is operational.

Force Main

Hayward Marsh Restoration Project Construction Access Route
The East Bay Regional Park District (EBRPD) is leading a project to restore the Hayward Marsh to a tidal marsh, in alignment with the Hayward Regional Shoreline Adaptation Master Plan. Hayward Marsh had previously provided wastewater polishing for a portion of USD flow. That treatment function was phased out in 2019 by mutual agreement between USD, EBDA, and EBRPD, and the associated discharge permit was rescinded in 2022.

The proposed marsh restoration and sea-level rise resiliency project is currently in design, and implementation will require significant amounts of fill to be brought into the site. EBRPD staff contacted EBDA because the anticipated construction route includes trucks filled with soil, as well as empty trucks leaving the site, to transverse EBDA's force main. EBRPD is tentatively planning to start soil import in Summer 2025, pending permits. The duration of soil import is dependent on availability of fill material, and could possibly take 5-10 years, with additional construction activities taking place after soil import is complete.

EBDA staff engaged DCM Consulting, Inc. (DCM), EBDA's contract geotechnical engineer, to prepare a Technical Memorandum (TM) providing recommendations and requirements for construction access for the project over the EBDA force main. DCM has performed this type of geotechnical engineering review for EBDA in the past and has also worked with EBDA's Member Agencies. The TM prepared by DCM and forwarded to the EBRPD is attached at the end of the O&M status report. EBDA staff is currently working with EBRPD staff to memorialize the recommendations and commitments EBRPD is making prior to the start of construction.

Operations Center

No change; all equipment is operational.

Miscellaneous Items

Underground Service Alerts
EBDA received thirteen (13) Underground Service Alert (USA) tickets during the month of January 2025. Five required an Electronic Positive Response (EPR) and calls/emails to the excavators, and of the five, four required field verification.

Wet Weather
During the month of January 2025, there were no significant rain events that required the operation of an OLEPS diesel pump, and there were no capacity exceedance events.

Total rainfall for the month of January 2025 (in inches) was as follows:

Oakland	Hayward	Livermore
0.24	0.34	0.20

Special Projects

Cargill Brine Project

As discussed at previous Commission Meetings, following certification of the Final Environmental Impact Report (EIR) for the proposed project, Cargill informed EBDA staff that they have made the decision to re-evaluate the "Bayside" pipeline route. Cargill is continuing to refine the route and expects it to be very similar to the Bayside alternative outlined in the EIR. Cargill is continuing to meet with landowners along the new proposed route. Cargill is also investigating an alternative that would upgrade and repurpose a former Shell pipeline.

Cargill's preliminary schedule shows revised CEQA analysis in 2025, and construction beginning sometime between 2027 and 2030 depending on permitting, with operation commencing between 2031 and 2033. Cargill has requested that EBDA consider an interim Project Approval Agreement between the parties that would allow Cargill to begin construction on elements of the project that do not directly affect EBDA, such as reconfiguration of intakes and pond structures at Cargill's Newark salt facility. Staff is currently working with Cargill to negotiate this agreement and expects to bring it to the Commission for consideration in the coming months. The Agreement would be accompanied by findings and a resolution to approve the EIR. Once negotiated, the Project Approval Agreement would be superseded by the final Operating Agreement.

Advanced Quantitative Precipitation Information (AQPI) Project

The regional AQPI project continues to move forward with the goal of improving the prediction of rainfall events in the Bay Area. Following a series of delays, the East Bay radar was installed at Rocky Ridge in Las Trampas Regional Wilderness Park in December 2022, and data from the site became available in December 2023. The AQPI Program Management team developed an updated website and data management tools for the 2024-2025 wet season. Agencies are currently developing additional tools to make the data more accessible for use in decision-making.

DCM Consulting, Inc.

P.O. Box 225, Lafayette, CA 94549, Telephone: 925.322.9590

Technical Memorandum

www.dcmconsults.com

To:	Howard Cin East Bay Dischargers Authority (EBDA)	Date:	February 7, 2025
From:	Dave Mathy DCM Consulting, Inc.	File:	No. 431
Subject:	East Bay Regional Park District (EBRPD) Hayward Marsh Restoration – Construction Access Route Crossing East Bay Dischargers Authority (EBDA) 60-inch Force Main Pipeline Hayward, California		

1.0 INTRODUCTION

This technical memorandum presents the results of a geotechnical engineering review of currently available EBRPD site development plans for restoration of Hayward Marsh in Hayward, California with respect to potential impacts on EBDA's pipeline system. The EBDA pipeline system (i.e., EBDA Transport System) consists of approximately 11.5 miles of reinforced concrete pipe (RCP) force main (i.e., pressurized) extending along the eastern margin of San Francisco Bay from Union City to San Leandro. The pipeline transports treated wastewater effluent from Union Sanitary District, the City of Hayward, Oro Loma Sanitary District, Castro Valley Sanitary District, the City of San Leandro, and the Livermore/Amador Valley Water Management Agency to EBDA's outfall pipeline in San Francisco Bay. At the Hayward Marsh Restoration project site, the EBDA force main pipeline is a 60-inch inside diameter reinforced concrete pipe (RCP) located north and east of the marsh land. While no marsh restoration earthwork will occur over the EBDA pipeline current Hayward Marsh Restoration plans illustrate a Construction Access Route passing over EBDA's 60-inch RCP at the location shown in Figure A.

Figure A – Location of EBRPD Construction Access Route to Whitesell St. crossing over EBDA's 60-inch RCP force main pipeline. The Construction Access Route will be on the south side of the drainage channel west of Whitesell St.

See Figures 1 and 2 for illustrations of the EBRPD Marsh Restoration Plan and the crossing location.

The following documents have been provided to DCM Consulting, Inc. by EBDA for this geotechnical engineering evaluation of potential impacts of the EBRPD Marsh Restoration Construction Access Route crossing over the EBDA 60-inch RCP force main pipeline.

- East Bay Regional Park District
  Restore Hayward Marsh – Project Overview
  65% Plan
  Sheet No. 2
  By: Upright Engineering
  Dated: 7/17/24

- Technical Memorandum
  EBRPD Restore Hayward Marsh: Task 2 – Conduct Relevant Studies
  Geotechnical Conditions and Conceptual Recommendations Memorandum
  By; GEI Consultants
  Dated: December 23, 2020

- East Bay Dischargers Authority (EBDA)
  Force Main Between Hayward and Alvarado
  Plan and Profile Sta. 58+50 to Sta. 73+50
  By: Kennedy Engineers
  Dated: August 2, 1977

- East Bay Dischargers Authority
  Transport System Inspection and Condition Assessment
  By: Brown and Caldwell
  Dated: October 11, 2021

- Geotechnical Report
  City of Hayward
  Hayward Water Pollution Control Plant
  By: Engeo
  Dated: November 2, 2023

2.0 PROJECT DESCRIPTION

The EBDA 60-inch RCP force main pipeline was constructed in the late 1970's (circa 1977) by conventional open cut trenching. Figure 3 at the end of this technical memorandum is the Record Drawing, Plan and Profile for the 60-inch RCP force main pipeline in the vicinity of the Hayward Marsh. The EBRPD Construction Access Route is at approximately Station 64 + 00 on the EBDA Record Drawing. The 1977 ground surface elevation at the crossing location was about El. 5 (note 100 feet was added to all elevations to avoid negative numbers). The 1977 EBDA Record Drawings and elevations are based on NGVD 29 (National Geodetic Vertical Datum 1929). Current baseline elevations are based on NAVD 88 (North American Vertical Datum 1988). To convert the Record Drawing elevations to NAVD 88 in the Hayward Marsh area add 2.76 feet to NGVD 29 elevations. Therefore, the

undisturbed ground surface elevation over the top of the EBDA 60-inch RCP force main pipeline should be taken as El. 7.76.

The cover on the EBDA 60-inch RCP force main pipeline as shown in the 1977 Record Drawings was about 5 feet (see Figure 3). This is the cover thickness in the presently undisturbed marsh area south of the drainage channel shown in Figure A and Figures 1 and 2.

The drainage channel currently present between Whitesell St. and the marsh area was constructed between 1980 and 1982 (taken from www.historicaerials.com). The railroad spur on the north side of the drainage channel and the commercial property at 25495 Whitesell Street on the south side of the drainage channel were also constructed between 1980 and 1982. The short berms on the north and south sides of the drainage channel and the railroad spur are at about the same elevation (see Photos 1 and 2).

From Google Earth, the elevation of the top of berms on each side of the drainage channel and railroad spur are equal at about El. 11. At the crossing location the drainage channel berms appear to have been raised by about 3 feet over the undisturbed original marsh elevation (see Photo 2). Therefore, the cover over the EBDA 60-inch RCP force main pipeline at the southern berm and EBRPD Construction Access Route is about 8 feet.

EBRPD plans are to use the southern berm of the drainage channel as the Marsh Restoration Construction Access Route. This route will be used by both loaded and empty transfer trucks bringing import fill to the marsh restoration project. All construction traffic using the Construction Access Route will enter/exit from and to Whitesell Street and as such, all construction traffic must conform to H20 loading requirements (i.e., be street/highway legal).

Photo 1 – View of drainage channel from Whitesell St. looking west. This channel was constructed after the EBDA pipeline, most likely resulting in locally reduced cover on the RCP force main. The EBRPD Construction Access Route will be on the south side berm of the drainage channel (photo left, red line). To photo right are the north side berm and railroad spur tracks.

The thickness of berm fill above natural grade at the EBDA crossing (i.e., the grade in 1977 at the time of EBDA pipeline construction) is approx. 3 feet.

Photo taken on January 2, 2025.

Photo 2 – View of drainage channel from railroad spur looking southwest. This channel was built after the EBDA pipeline, most likely resulting in locally reduced cover on the 60-inch RCP force main.

Note that the top of the EBDA pipeline is at sea level (i.e., El. 0 in 1977).

Photo taken on January 2, 2025.

2.1. Condition of EBDA 60-inch RCP Force Main

In 2018 Brown and Caldwell completed a comprehensive inspection and condition assessment for the entire EBDA Transport System facilities (e.g., pipelines, manholes, valves, and fittings, etc.). Brown and Caldwell's findings, conclusions and recommendations were transmitted to EBDA in their inspection and condition assessment report dated October 11, 2021. Brown and Caldwell completed interior and exterior inspections of the 11.5-mile-long Transport System pipelines at discrete locations including just south of the planned EBRPD Construction Access Route. Brown and Caldwell concluded that the Transport System pipelines were in good condition. Following are some excerpted quotes from the Brown and Caldwell report:

- "Despite its approximate 40-year age and exposure, the transport system pipelines and concrete manhole structures show no signs of structural damage or deterioration." (page 6);
- "Joints are sound and the pipe is generally smooth." (page 29)
- "Based on expert analysis and the current observed condition of the asset, the authority should expect a remaining useful life of 50 to 100 years." (page 41)

Based on the Brown and Caldwell inspection and condition assessment report it is safe to assume that the EBDA 60-inch RCP force main pipeline at the proposed EBRPD Construction Access Route crossing is in good condition.

2.2. Geotechnical Conditions

The geologic setting of the Hayward Marsh area is well described in the Geotechnical Conditions and Conceptual Recommendations Technical Memorandum by GEI dated December 23, 2020. The Hayward Marsh is located on the eastern margin of San Francisco Bay and as such is underlain by variable thickness of Young Bay Mud. Young

Bay Mud is a geologically recent accumulation of sediments within San Francisco Bay consisting of fine-grained soils (silts and clays) exhibiting extremely weak shear strength and high compressibility under surcharge loading. The thickness of Young Bay Mud deposits is greatest within the Bay and thins out around the immediate Bay margins. The Young Bay Mud is underlain by older sediments consisting of much stronger, less compressible clays, silts and sands. Figure 4 excerpted from the GEI TM includes contours of the thickness of Young Bay Mud underlying the wetlands area. As seen in Figure 4 the EBRPD Access Route crossing of EBDA's 60-inch RCP force main pipeline is upgradient (i.e., east) of the Young Bay Mud deposits. Figure 4 also illustrates the locations of subsurface exploration – Cone Penetration Test (CPTs) by GEI. CPT-1 is closest to the crossing location, about 1,400 feet to the west. Figures 5 and 6 excerpted from the GEI TM are plots of the CPT-1 profile. As seen in CPT-1 the soils at the invert depth of the EBDA 60-inch RCP force main pipeline are medium stiff clays with a Standard Penetration Test blow count N-value of N = 8. Laboratory testing of native soils from CPT-1 at depths of 11.5 to 12 feet below ground surface include Liquid Limit = 78% and Plasticity Index = 57 which classifies as a high plasticity clay to organic clay (CH to OH).

Also in the vicinity of the crossing location is the City of Hayward's Water Pollution Control Plant (WPCP). Figure 7 is an excerpt from the most recent geotechnical investigation completed at the WPCP by Engeo showing test boring B-2, about 800 feet north of the crossing. As seen in test boring B-2 the soils at the invert depth of the EBDA 60-inch RCP force main pipeline are stiff clays with a Standard Penetration Test blow count of N = 13.

Both the GEI CPT-1 and Engeo test boring B-2 indicate that the EBDA 60-inch RCP force main pipeline should not be underlain by soft and highly compressible Young Bay Mud. Both CPT-1 and B-2 (see Figures 5 through 7) indicate that the EBDA 60-inch RCP force main pipeline should be directly underlain by medium stiff to stiff fine-grained clays.

With respect to geotechnical conditions the most significant unknown is the composition, consistency and strength of the drainage channel berm soils placed 45 years ago (i.e., circa 1980 to 1982).

3.0 CONCLUSIONS

The following conclusions are based on the project description and geotechnical conditions summarized above.

1. At the crossing location the depth of cover on the EBDA 60-inch RCP force main pipeline as depicted in the 1977 Record Drawings (Figure 3) is 5 feet. With construction of the drainage channel shown in Photos 1 and 2 and berm construction on the north and south sides of the channel in about 1980 to 1982, the depth of cover on the EBDA 60-inch RCP at the drainage channel raised berms is now approximately 8 feet. Assuming that all wetlands restoration construction traffic follows the south side berm of the drainage channel and conforms to H20 loading (i.e., street/highway legal), the applied live loading on the EBDA 60-inch RCP with 8 feet of cover will be less than 1 psi.

   Applied live loads of 1 psi are nominal for a 60-inch RCP in good condition.

2. Soils directly supporting EBDA's 60-inch RCP force main pipeline should consist of medium stiff to stiff clays (i.e., no Young Bay Mud). These medium stiff to stiff clay soils will provide reliable support for the 60-inch RCP with low potential for long-term consolidation settlement from the approximate 3 feet of drainage channel berm fill added over the pipeline in 1980 to 1982.

As long as no new fill is added to the drainage channel berm over the EBDA 60-inch RCP there should be no settlement from native soil consolidation and live loads associated with the construction access route.

3. Impact loading caused by transfer trucks driving over a rough, rutted, or bumpy surface of the drainage channel berm, especially with fully loaded transfer trucks, will result in live impact loading on the underlying EBDA 60-inch RCP force main pipeline far in excess of the standard H20 highway/street loading.

4. At present we have no geotechnical design reports or construction testing reports (e.g., fill compaction tests) for the drainage channel berm. We do not know if the drainage channel berm was designed for long-term, repetitive construction traffic. Long-term berm stability is a concern for the EBDA 60-inch RCP force main pipeline. Given the close proximity of the top of pipe to the toe of the drainage channel berm (see Photo 1 and 2), slope failure of the berm could impact the EBDA pipeline.

5. A unique aspect of evaluating potential impacts of EBRPD's Construction Access Route over the EBDA 60-inch RCP force main pipeline is the planned long duration of the Wetlands Restoration project at 5 to 10 years. Many site conditions can change over 10 years so it is incumbent upon EBDA and EBRPD to periodically and regularly inspect the crossing location and ensure that the Construction Access Route is maintained smooth, that no fill is added to the drainage channel berm and that the drainage channel berm shows no signs if instability (e.g., surface slumping, surface cracking parallel to the channel, etc.)

6. Because of the protracted duration of traffic on the construction access route and uncertainties associated with the depth of cover, and geotechnical conditions including berm stability under protracted live loading, the EBDA 60-inch RCP force main pipeline should be monitored and documented, specifically the elevation of the top of pipe and any changes in that elevation. Specific recommendations for pipeline monitoring are included in the following section of this technical memorandum.

4.0 RECOMMENDATIONS

1. A detailed topographic survey should be completed for the area of the Construction Access Route over the EBDA 60-inch RCP force main pipeline including the elevations of the unimproved ground north and south of the drainage channel, the elevations of the top of the drainage channel berms, the slopes of the drainage channel sides and the elevation of the bottom of the drainage channel.

2. The 60-inch EBDA force main pipeline should be potholed at the crossing location on each side of the drainage channel berm/construction access route (i.e., just north of the north berm and just south of the south berm) by vacuum excavation to:

    a. Determine the location and alignment of the EBDA pipeline under the drainage channel and berm. This pipeline crossing location should be clearly marked for additional recommendations for monitoring (see recommendation 5).

b. Verify the existing pipeline top of pipe elevation and cover depth at the south berm, presently assumed at 8 feet. Cover depth of less than 8 feet will require reevaluation of the conclusions and recommendations of this technical memorandum.

c. Determine the existing pipeline top of pipe elevation and depth of cover within the drainage channel at the toe of the south side berm.

3. Limit construction traffic on the access route to rubber-tired vehicles (e.g., transfer trucks) conforming to H20 highway and street legal loading and track-mounted construction equipment to a track contact pressure of less than 10 psi.

4. Install a Surface Settlement Monitoring Point in the drainage channel berm directly over the EBDA 60-inch RCP force main pipeline to monitor the surface of the berm for any change in elevation (i.e., berm settlement from long-term repetitive construction traffic). See Figure 8 for an example of a surface settlement monitoring point (SSMP).

   Survey monthly during active construction traffic on the access route. Recommended action levels:

   - Report any berm settlement of more than 1 inch;
   - Stop work at any berm settlement of more than 2 inches. At this point carefully inspect the berm and check elevations of the top of the EBDA 60-inch RCP force main pipeline.

5. Install Utility Monitoring Points on each side of the drainage channel south berm and construction access route near the top of the berm but outside the construction access route traffic path. See Figure 9 for an example of a utility monitoring point.

   Survey monthly during active construction traffic on the access route. Recommended action levels:

   - Report any 60-inch RCP force main pipeline settlement of more than 0.5 inches;
   - Stop work at any 60-inch RCP force main pipeline settlement of more than 1 inch. At this point evaluate mitigation measures to eliminate construction traffic loading on the EBDA 60-inch force main pipeline (e.g., at-grade bridge).

6. Do not allow localized stockpiling of soils or construction materials or construction equipment on the EBDA easement.

5.0 LIMITATIONS

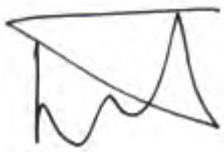
This technical memorandum has been prepared for the exclusive use of EBDA for evaluation of potential impacts of EBRPD's Hayward Marsh Restoration project construction on EBDA's 60-inch RCP force main pipeline as described herein. This technical memorandum may not be used for any other purpose or for any other project. The Hayward Marsh Restoration project is a long-duration earthwork project requiring import fill. The wetlands

restoration is anticipated to take 5 to 10 years to complete as import fill becomes available. The protracted duration earthwork activities and construction traffic on the Construction Access Route described herein presents unique conditions for the EBDA pipeline crossing. Periodic and regularly scheduled inspections of the pipeline crossing for the 5-to-10-year wetlands restoration duration should be completed by EBDA. Any change in site conditions from those described herein should be re-evaluated for impacts on the EBDA 60-inch force main pipeline.

This technical memorandum does not include an evaluation of the drainage channel berm stability and potential impacts of long-term construction equipment traffic on berm stability.

Within the limitations of scope, schedule and budget, DCM Consulting Inc.'s services have been provided in accordance with generally accepted practices in the field of geotechnical engineering as practiced in the San Francisco Bay Area. The conclusions and recommendations in this technical memorandum are based on the author's professional knowledge, experience, and judgement. No warranty or other conditions express or implied should be understood.

Let me know if you have any questions or need any additional review of EBRPD's Hayward Marsh Restoration project for potential impacts on the EBDA 60-inch RCP force main pipeline.



David C. Mathy
C.E. 28082
G.E. 569

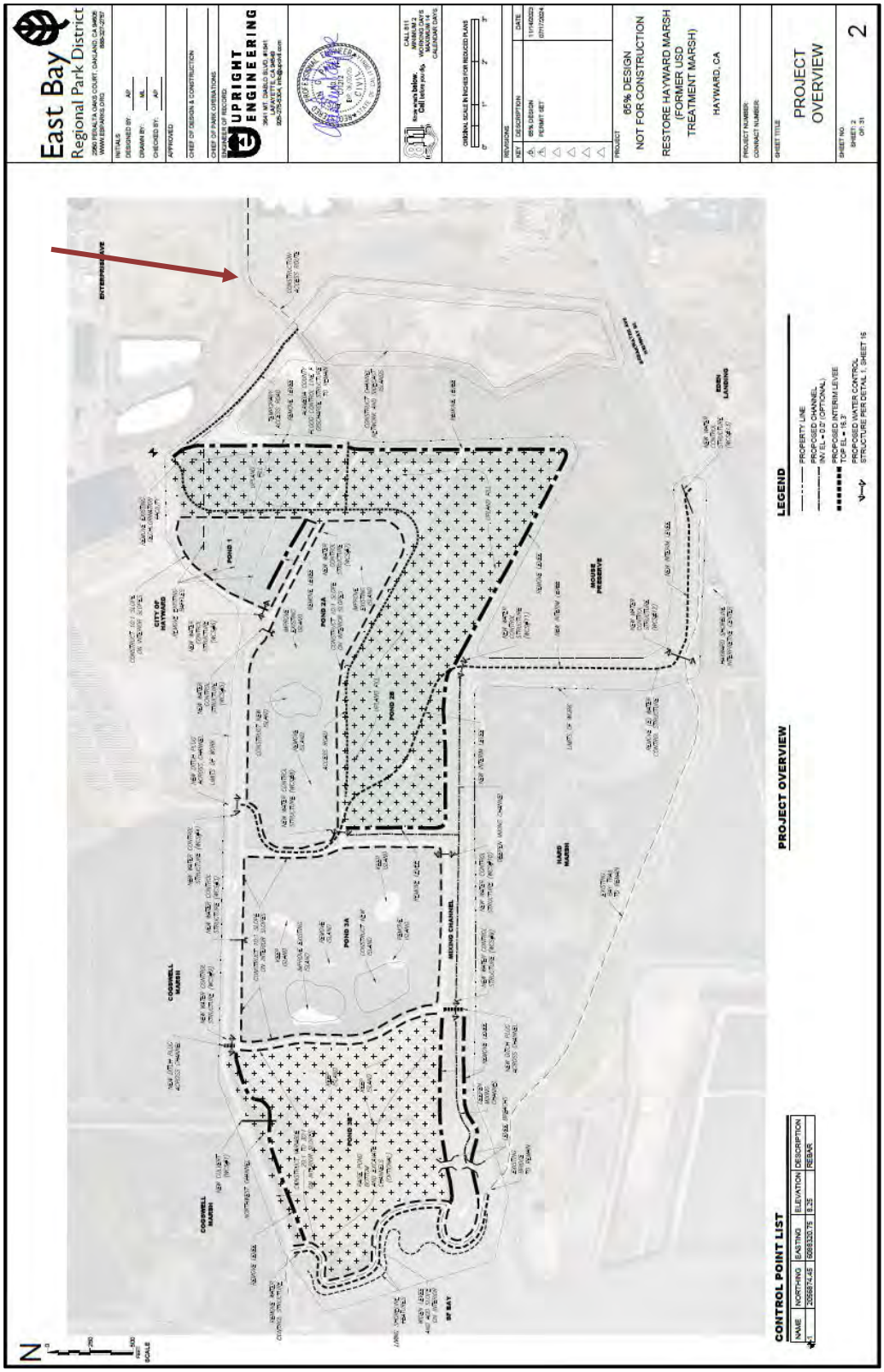


Figure 1 – East Bay Regional Park District, Hayward Marsh Restoration Site Plan. Red arrow is crossing location (see also Figure A)
See Figure 2 for close up of crossing location.

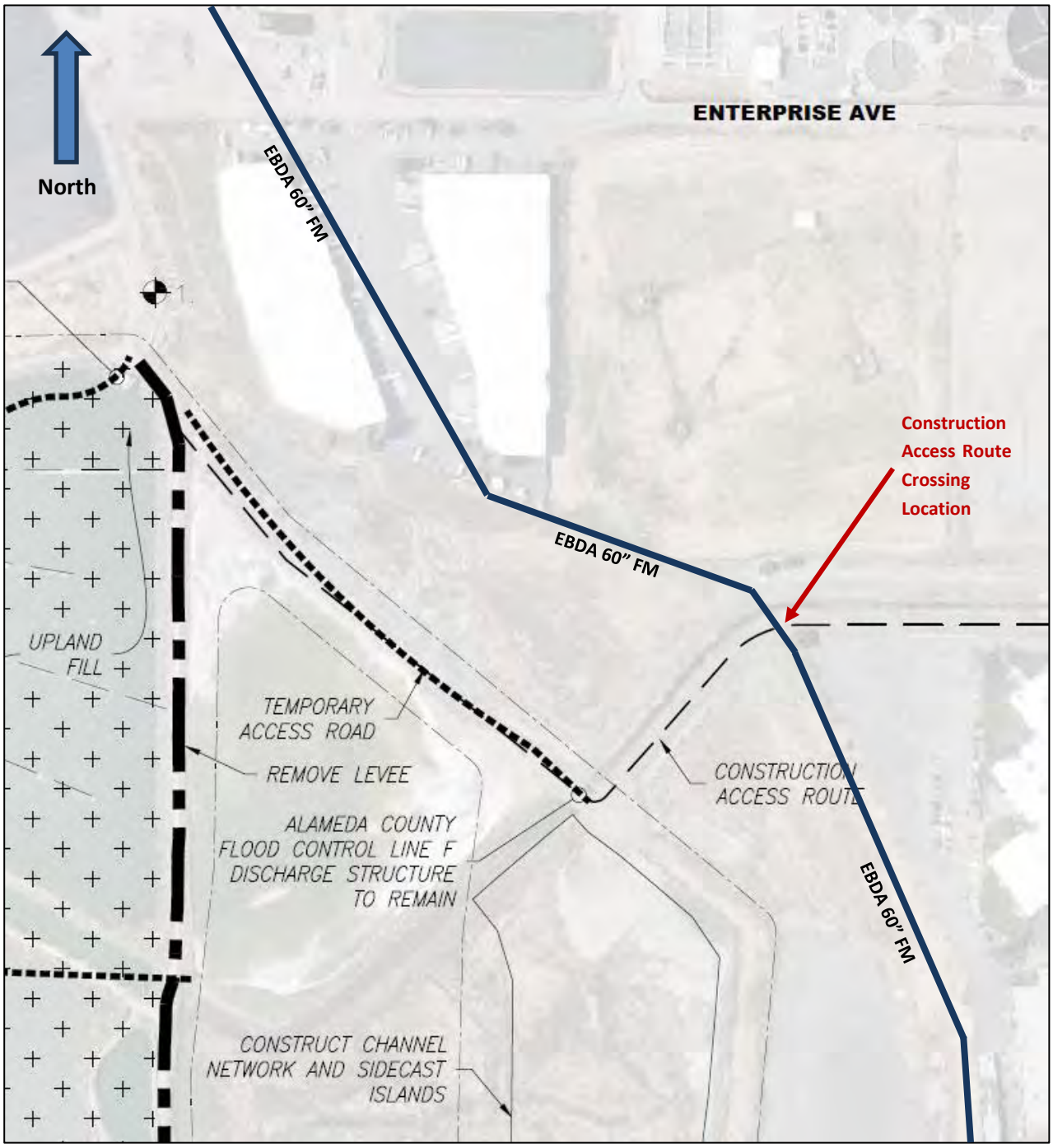


Figure 2 – Location of EBRPD Construction Access Route crossing over EBDA's 60-inch RCP Force Main pipeline. Import fill transfer trucks (both loaded and empty) are to use this construction access route that leads to Whitesell St. and Enterprise Ave.

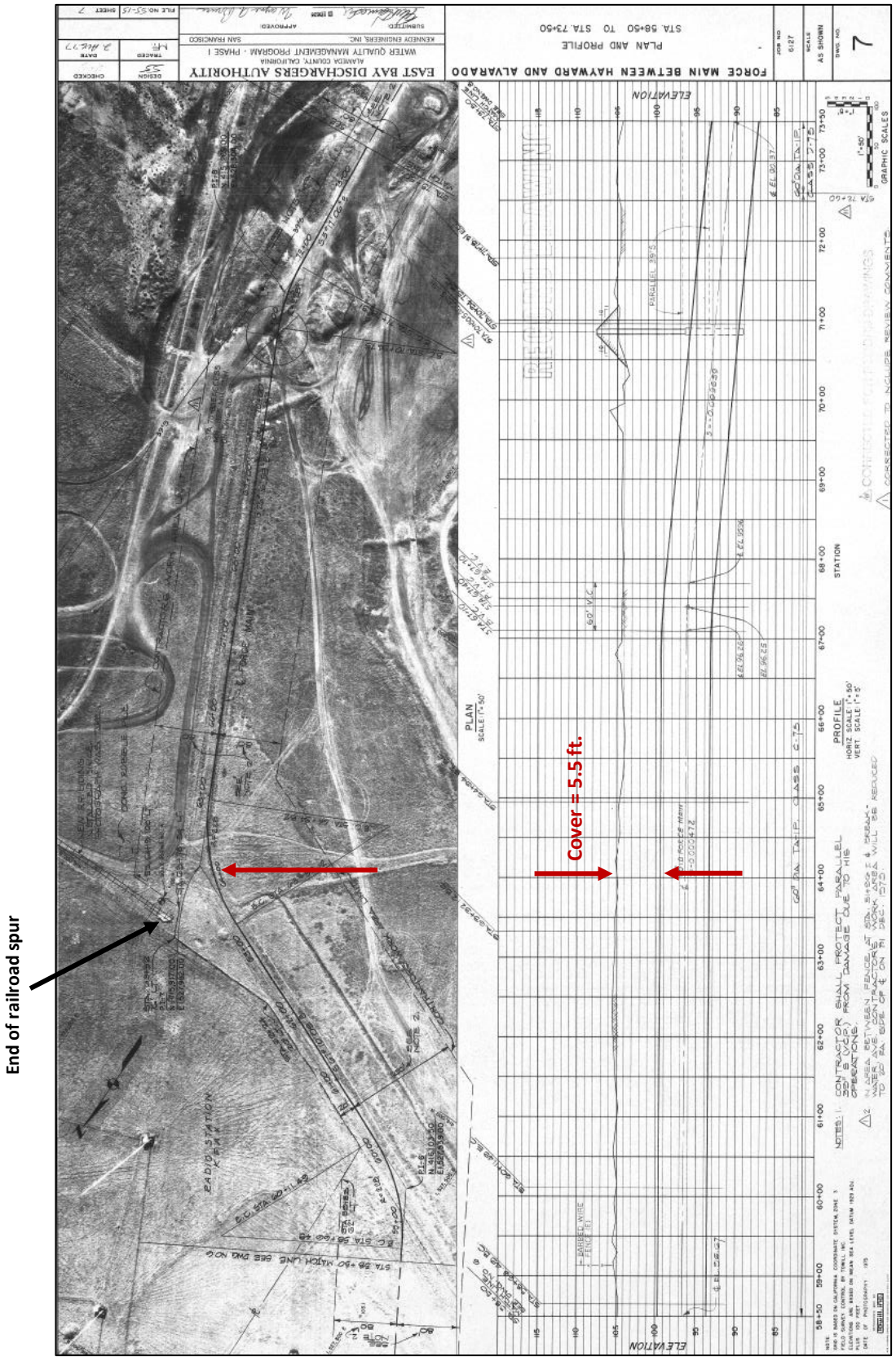


Figure 3 – EBDA 60-inch RCP Force Main, 1977 plan and profile at the EBRPD construction access road crossing.
Note, cover on the pipeline is approx. 5.5 feet in 1977. Note that the drainage channel does not show up on this plan and profile as it was extended to Whitesell St between 1980 and 1982.

Ground Surface Elevation, 1977 = El. 5.
Datum is NGVD 1929.
For current NAVD 1988 Elevation add 2.76 ft.

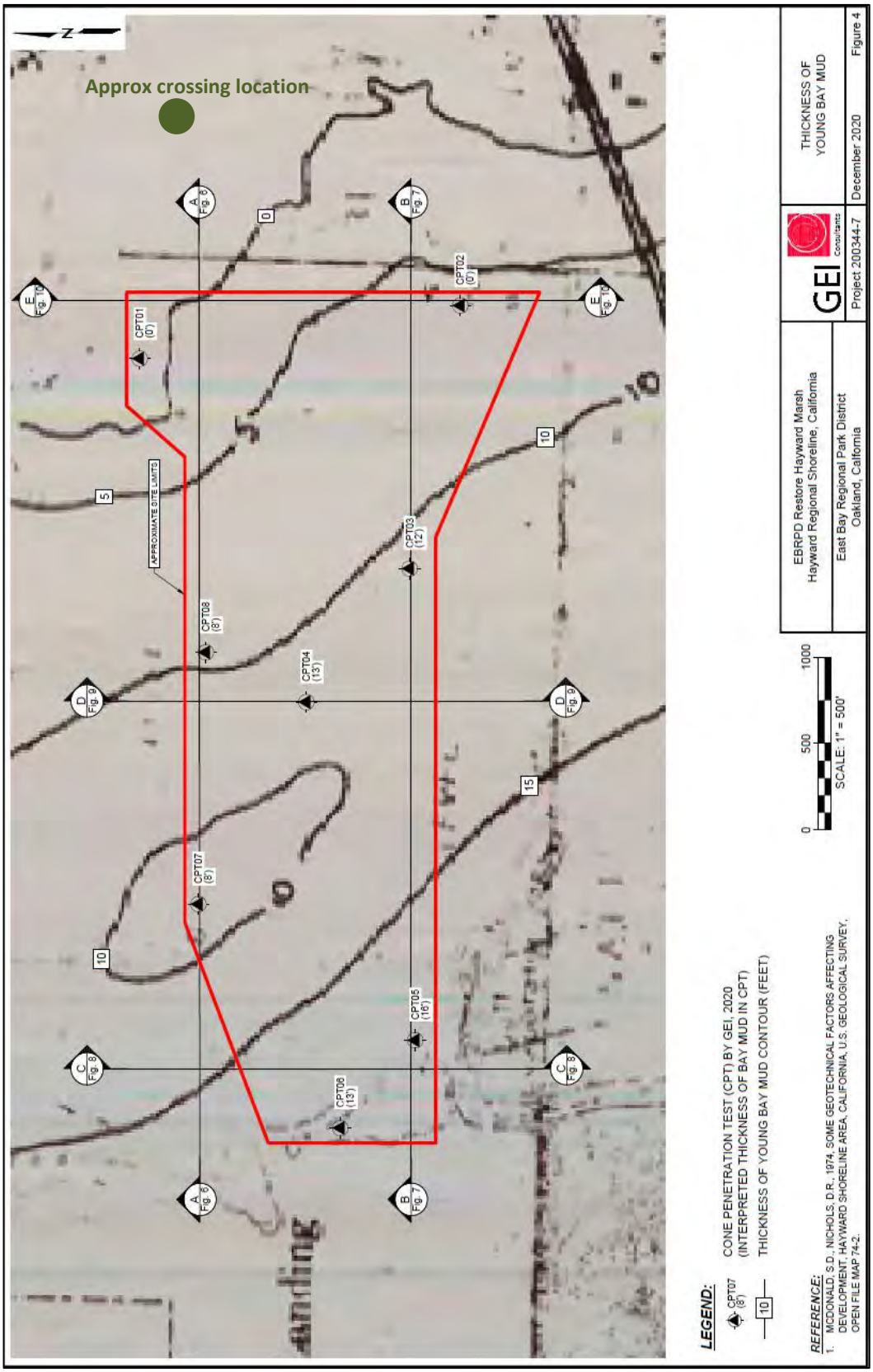


Figure 4 – GEI exploration map with Young Bay Mud Thickness Contours

Note the crossing location, shown in green, is upgradient (east) of the Young Bay Mud

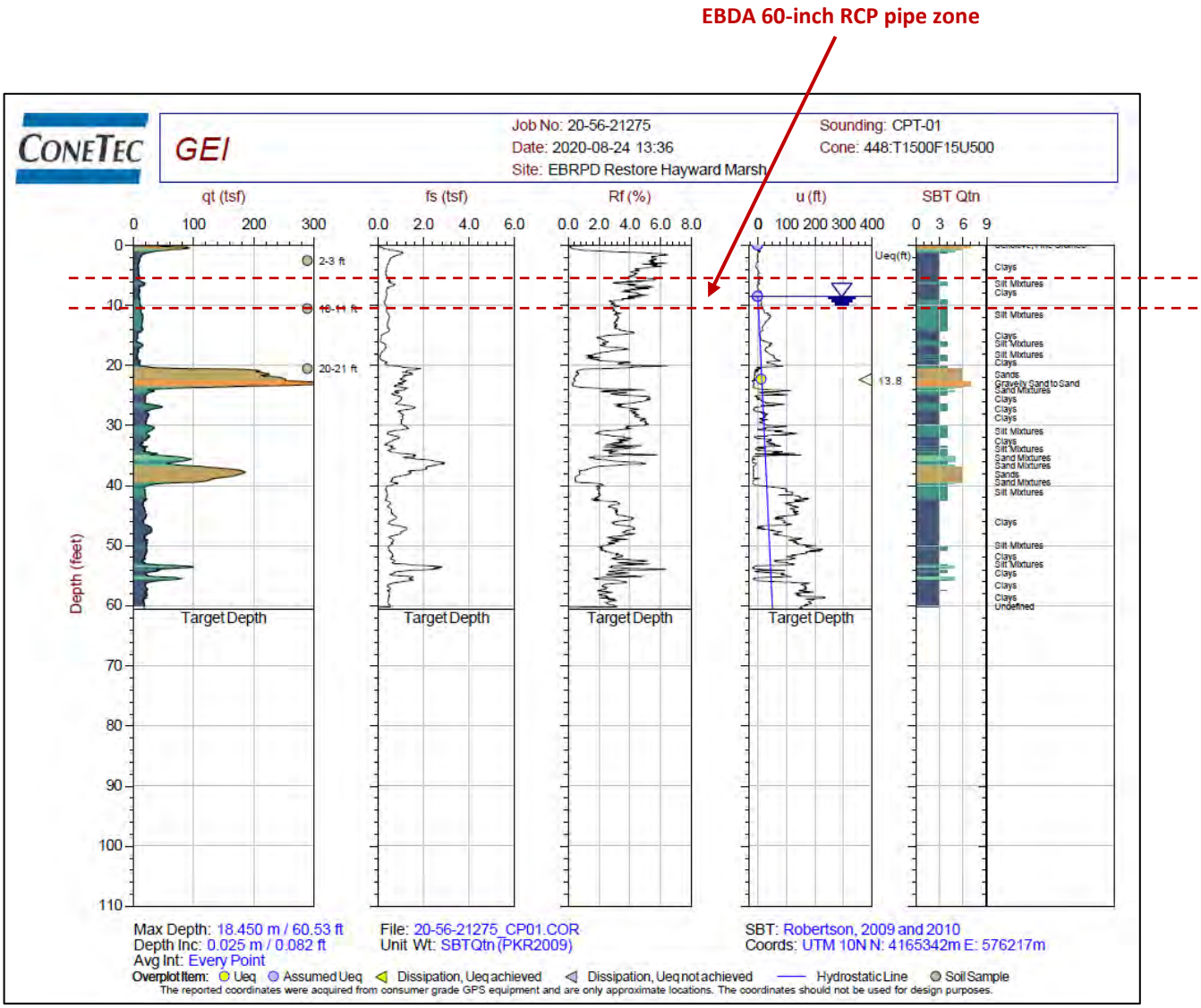


Figure 5 – Plot of CPT 01 by GEI, soil type at and below the invert depth of the EBDA 60-inch RCP force main are silt mixtures and clays

CPT 01 is approximately 1,400 feet west of the EBDA 60-inch RCP force main pipeline and EBRPD Construction Access Route crossing.

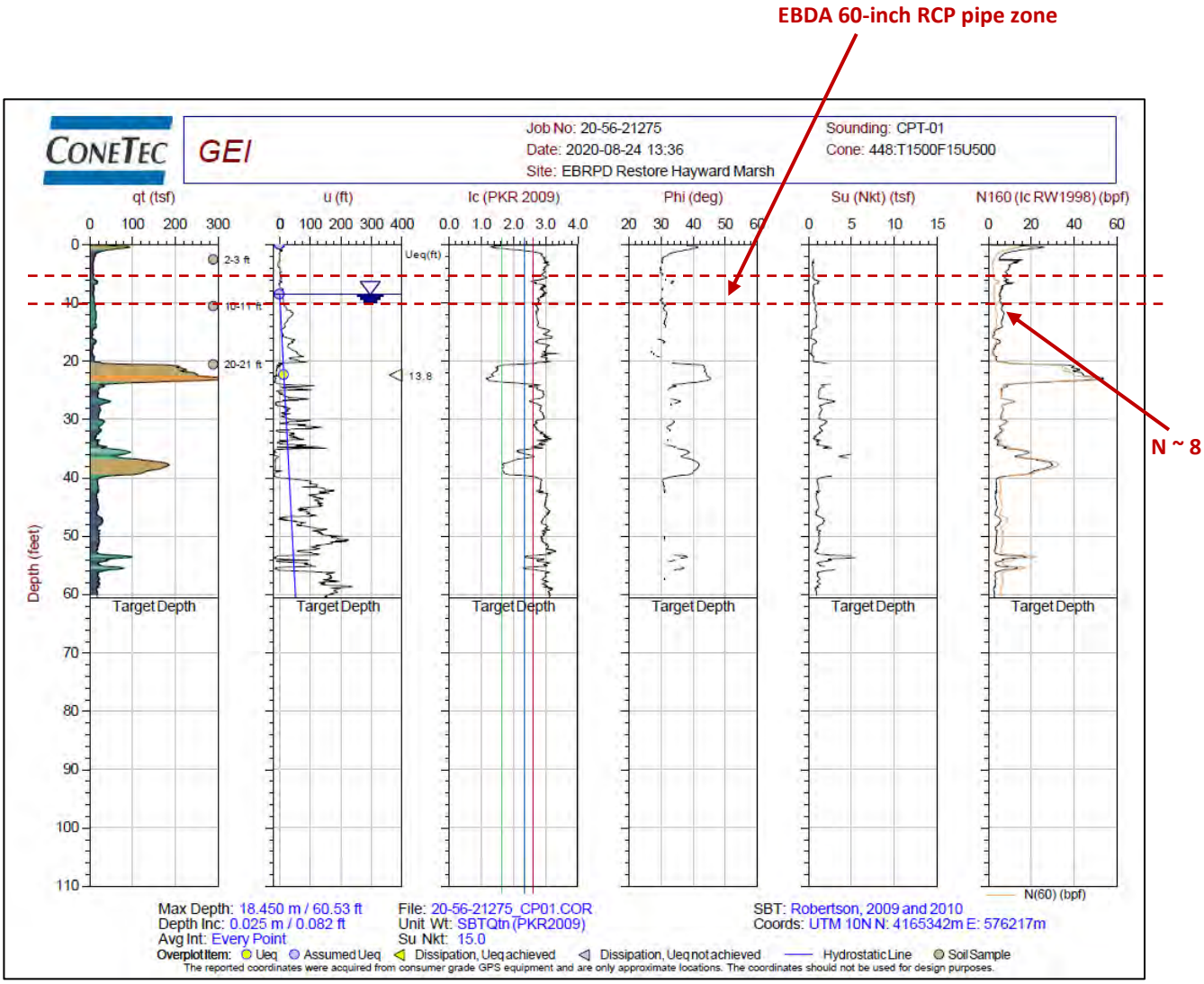
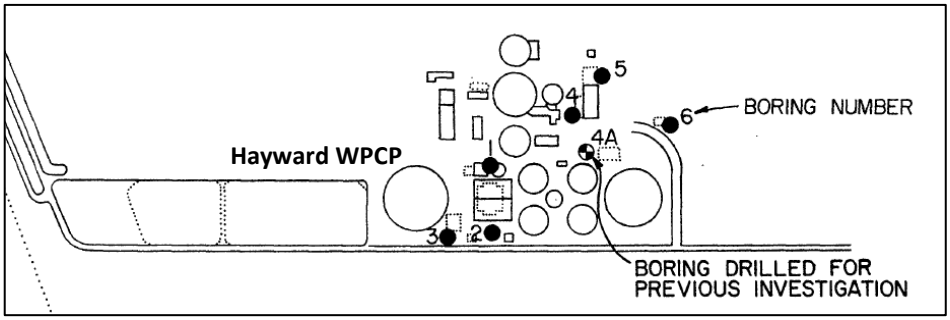


Figure 6 – Advanced Plot of CPT-01 with Standard Penetration Test (SPT) blow count correlation N1(60).

N1(60) is approx. N = 8 at the invert depth of the EBDA 60-inch RCP force main = medium stiff clays

No Bay Mud in CPT-01, see also Figure 4 for Young Bay Mud thickness contours.



EBDA 60-inch RCP pipe zone, top of pipe ~ El. 0

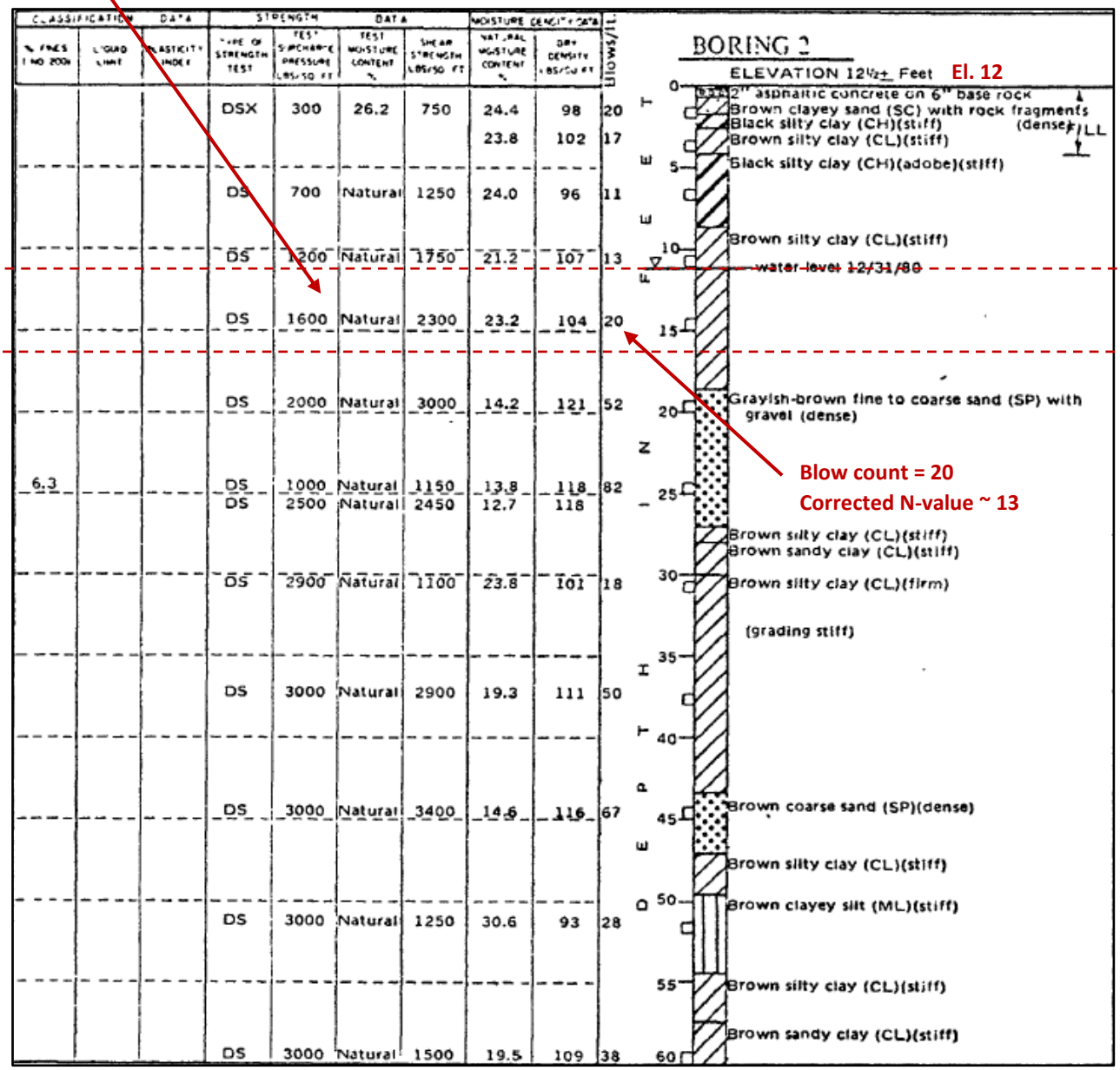


Figure 7 – Test Boring B-2 at southern border of Hayward WPCP in 1981, shortly after EBDA construction approx. 800 feet north of crossing. (B-3 only drilled to 15 feet bgs)
Note soils at and below the invert depth of the EBDA 60-inch RCP force main = **Brown, Stiff, Silty Clays (N ~13).**

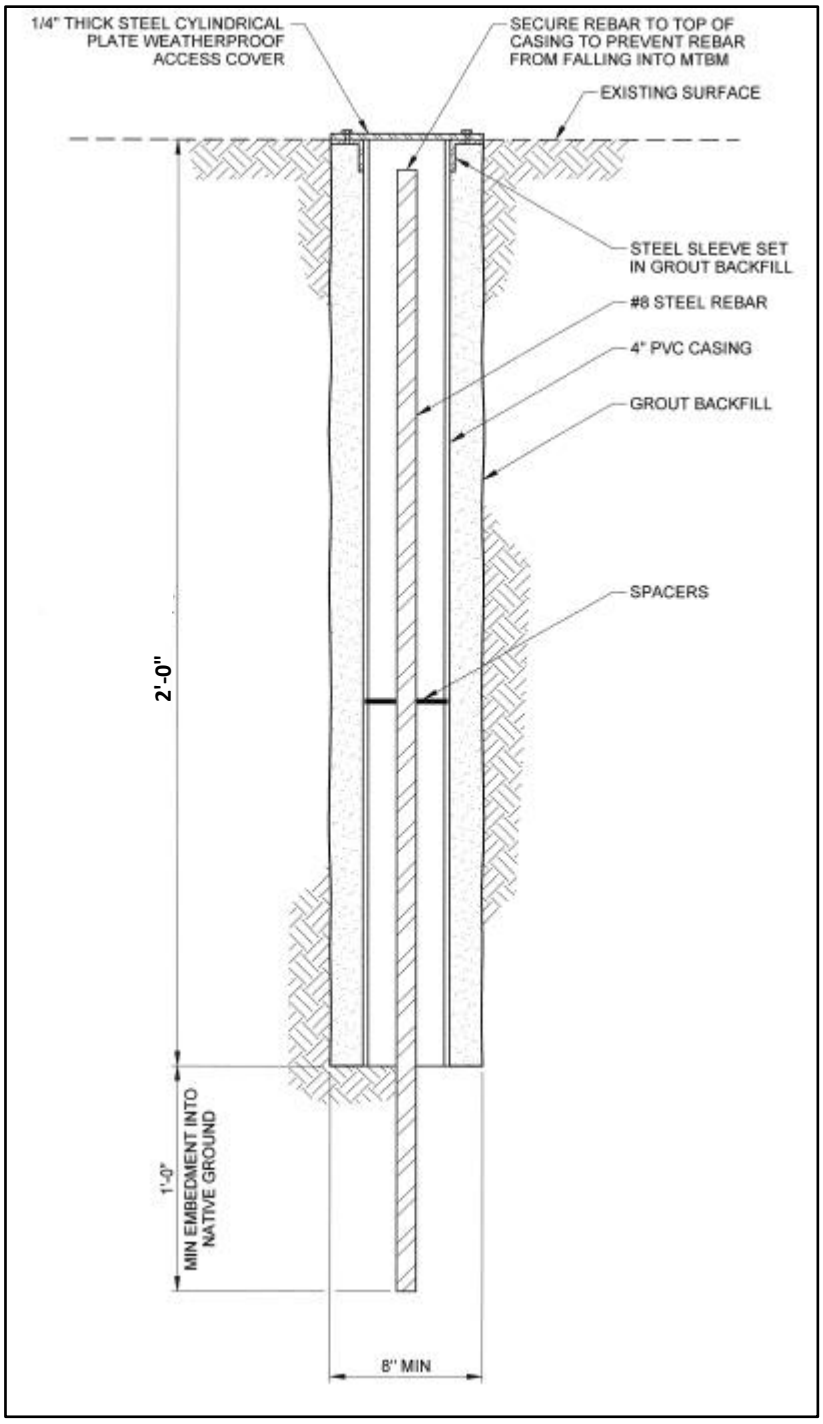


Figure 8 – Example detail for Surface Settlement Monitoring Point (SSMP)

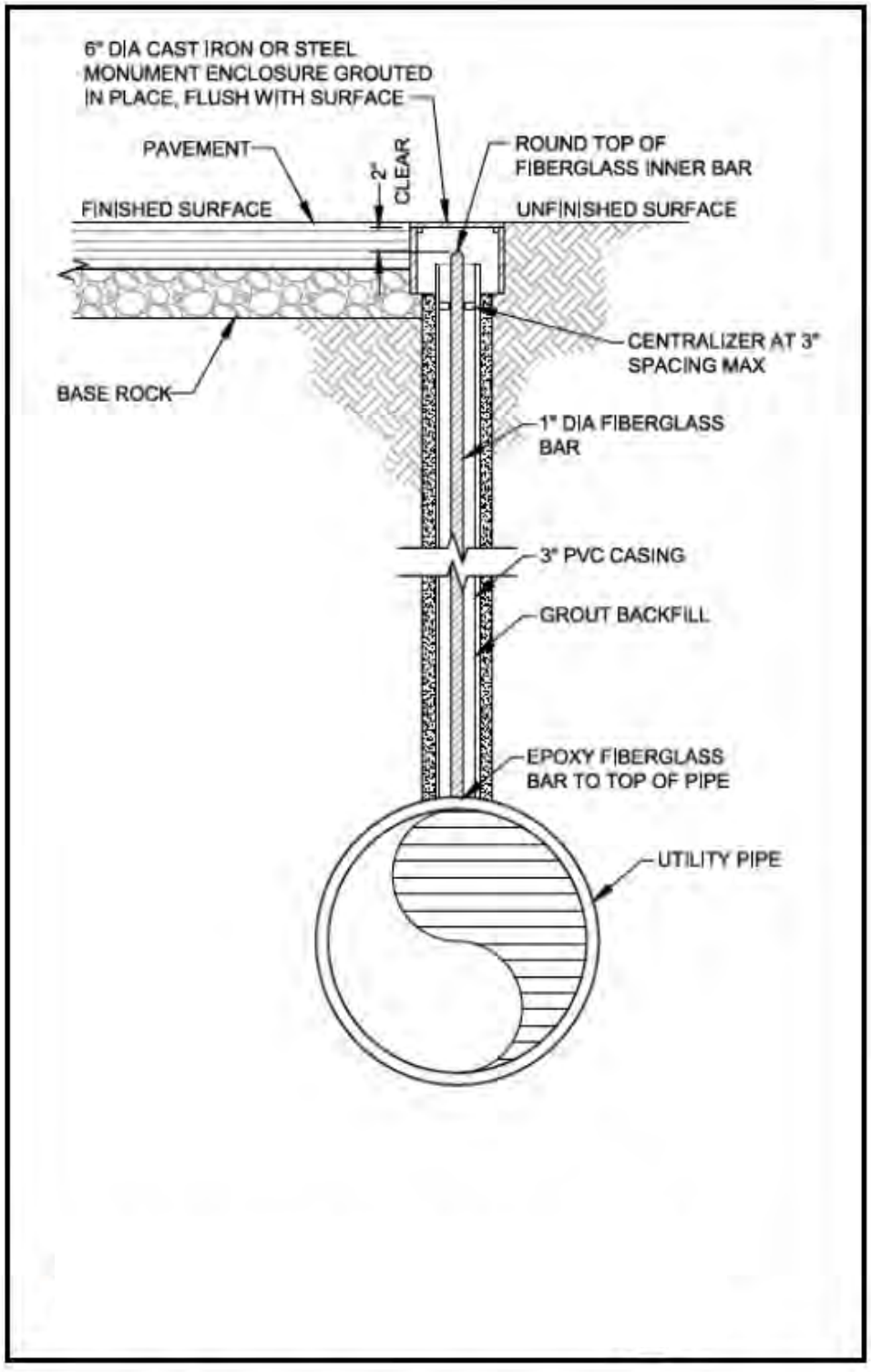


Figure 9 – Example detail for Utility Monitoring Point (UMP)

ITEM NO. OM6 RENEWAL AND REPLACEMENT FUND RECAP

Recommendation
For the Committee's information only; no action is required.

Strategic Plan Linkage
2. **Operations & Maintenance:** Ensure reliable operations and maintenance of the EBDA system to protect public health and the Bay.
    a. Implement EBDA's Asset Management Plan.

Discussion
In May 2024, as part of adopting the Authority's budget, the Commission authorized an annual contribution to the Renewal and Replacement Fund (RRF) for Fiscal Year (FY) 2024/2025 in the amount of $750,000. This amount is consistent with the Authority's Asset Management Plan and has been fixed at this level for the past 5 years. In June 2024, the Commission authorized a list of RRF projects totaling $795,000 for FY 2024/2025, including $100,000 in contingency funds to be used for unplanned projects.

The attached table provides a summary of funds expended this fiscal year-to-date on these projects, as well as projects approved in FY 2023/2024 and prior years that remain active or were recently completed. A total of $1,245,241 was spent in FY 2023/2024, and $687,257 has been spent this fiscal year-to-date. Excluding the HEPS Effluent Pump Replacement Project, which is not completed, EBDA has completed all of the projects in the table 5% under budget on average.

RRF Summary

Updated as of: January 31, 2025

Project Name	FY 2024/2025 YTD Expenditures	FY 2023/2024 Total Expenditures	Prior Years' Expenditures	Total Expenditures through 1/2025	Percent Spent	Percent Complete	Budget Estimate	Projected Completion Date
UEPS Payment #4 of 10 Per JPA		$420,000		$420,000	100%	100%	$420,000	Completed
UEPS Payment #5 of 10 Per JPA	$420,000			$420,000	100%	100%	$420,000	Completed
HEPS Effluent Pump Replacement	$138,543	$507,714	$40,881	$687,138	94%	75%	$730,000	October 2025
OLEPS, MDF & Office Roof Replacement		$50,462	$458,390	$508,851	93%	100%	$550,000	Completed
OLEPS Emergency Outfall		$52,647	$11,935	$64,582	76%	100%	$85,000	Completed
OLEPS Wet Well Gate Repair	$12,492	$33,861		$46,353	62%	100%	$75,000	Completed
MDF Exterior Painting		$38,900		$38,900	86%	100%	$45,000	Completed
EBDA Office Upgrade		$37,085	$6,130	$43,215	108%	100%	$40,000	Completed
Pickup Truck Replacement		$33,567		$33,567	84%	100%	$40,000	Completed
OLEPS Water System Upgrade	$42,350			$42,350	141%	100%	$30,000	Completed
OLEPS Diesel Engine #1 (Pump #2)	$26,741			$26,741	89%	100%	$30,000	Completed
OLEPS Diesel Engine #2 (Pump #3)		$25,389		$25,389	102%	100%	$25,000	Completed
HEPS Generator Radiator Replacement	$23,982			$23,982	96%	100%	$25,000	Completed
HEPS Pond #3 Valve Actuator	$6,565	$10,003		$16,568	110%	100%	$15,000	Completed
Miscellaneous Smaller or Unfinished Projects	$16,584	$35,614		$52,198				
Total	$687,257	$1,245,241	$517,335	$2,449,833			$2,530,000	

EAST BAY DISCHARGERS AUTHORITY
2651 Grant Avenue
San Lorenzo, CA 94580-1841
(510) 278-5910
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A Joint Powers Public Agency

ITEM NO. 12

REGULATORY AFFAIRS COMMITTEE AGENDA

Tuesday, February 18, 2025

9:00 A.M.

East Bay Dischargers Authority
2651 Grant Avenue, San Lorenzo, CA 94580

Committee Members: Johnson (Chair); Young

RA1. Call to Order

RA2. Roll Call

RA3. Public Forum

RA4. EBDA NPDES Compliance – See Item No. OM4
(The Committee will review NPDES Permit compliance data.)

RA5. Regulatory Reporting Checklist
(The Committee will review a checklist of completed regulatory reporting items.)

RA6. NPDES Annual Report
(The Committee will review the Authority's Annual Report submittal.)

RA7. PFAS Updates
(The Committee will receive updates on regulations and legislation related to PFAS.)

RA8. Motion Authorizing the General Manager to Execute a Professional Services Agreement with H.T. Harvey and Associates for a Biosolids Suitability Assessment in the Amount of $40,275
(The Committee will consider the motion.)

RA9. Adjournment

Any member of the public may address the Committee at the commencement of the meeting on any matter within the jurisdiction of the Committee. This should not relate to any item on the agenda. Each person addressing the Committee should limit their presentation to three minutes. Non-English speakers using a translator will have a time limit of six minutes. Any member of the public desiring to provide comments to the Committee on any agenda item should do so at the time the item is considered. Oral comments should be limited to three minutes per individual or ten minutes for an organization. Speaker's cards will be available and are to be completed prior to speaking.

In compliance with the Americans with Disabilities Act of 1990, if you need special assistance to participate in an Authority meeting, or you need a copy of the agenda, or the agenda packet, in an appropriate alternative format, please contact the Administration Manager at (510) 278-5910 or juanita@ebda.org. Notification of at least 48 hours prior to the meeting or time when services are needed will assist the Authority staff in assuring that reasonable arrangements can be made to provide accessibility to the meeting or service.

In compliance with SB 343, related writings of open session items are available for public inspection at East Bay Dischargers Authority, 2651 Grant Avenue, San Lorenzo, CA 94580. For your convenience, agenda items are also posted on the East Bay Dischargers Authority website located at http://www.ebda.org.

Next Scheduled Regulatory Affairs Committee Meeting
Tuesday, April 15, 2025 at 9:00 a.m.

ITEM NO. RA5 QUARTERLY REPORTING CHECKLIST

Recommendation
For the Committee's information only; no action is required.

Strategic Plan Linkage
1. **Regulatory Compliance:** Proactively meet or exceed regulatory requirements for protection of the environment and public health.

Background
Authority staff maintains a checklist of all regulatory reporting and related tasks to ensure timely and complete reporting.

Discussion
The following checklist is extracted from a complete list of routine regulatory activities addressed throughout the year. The following items were completed during the period of December 1, 2024 – January 30, 2025; there are no outstanding activities.

Authority	*Required Action*	*Occurrence*	*Date Completed*
ADP Business Payroll	Payroll Tax Return Download Quarter 3	Quarterly	1/7/2025
ADP Business Payroll	Print W-2 copies for EBDA payroll file (EE W-2 forms will be delivered)	Annual	1/26/2025
Alameda County	Financial Statements Submittal	Annual	12/4/2024
AlCo Environmental Health	OLEPS CUPA HMBP & Inventory Reporting (CERS ID 10188879)	Annual	1/26/2025
Alliant Insurance Services, Inc	Pollution Liability Insurance Program Renewal	Annual	12/26/2024
Bureau of Labor Statistics	Report monthly employment figures, include Commissioners and Staff	Monthly	1/13/2025
Ca Sanitation Risk Mgmt Authority	Pooled Liability Insurance Program - EPL Incentive Application	Annual	12/12/2024
City of San Leandro	MDF CUPA HMBP & Inventory Reporting (CERS)	Annual	1/26/2025
County of Alameda, Clerk/Recorder	Statement of Facts/Roster of Public Agencies Filing (Post-election changes to Commission)	Annual	1/3/2025
Department of Industrial Relations	Form 300A Posting	Annual	1/14/2025
Division of Occupational Safety & Health	OLEPS Crane Inspection/Certification	Annual	1/21/2025
East Bay Dischargers Authority	Review the Emergency Response Plan and Contingency Plan	Annual	1/13/2025
East Bay Dischargers Authority	Review the OLSD SPCC Plan	Annual	1/30/2025
Internal Revenue Service	Distribute W-2 forms to employees	Annual	1/15/2025
Internal Revenue Service	Distribute *Form 1099 (NEC or MISC)* to vendors/contractors	Annual	1/28/2025
Regional Water Quality Control Board	Recycled Water monthly reports	Monthly	1/30/2025
Secretary of State	Statement of Facts/Roster of Public Agencies Filing (Post-election changes to Commission)	Annual	1/3/2025
State Compensation Insurance Fund	Payroll Report, Semi-Annual Jul 01 - Jan 01	Semi-Annual	1/10/2025
State Controller's Office	Financial Statements Submittal	Annual	12/4/2024
State Controller's Office	Special Districts Financial Transactions Report (FTR)	Annual	1/24/2025
State Water Resources Control Board	Annual Waste Discharge Permit Fee	Annual	12/16/2024
State Water Resources Control Board	NPDES Annual Report	Annual	1/28/2025
State Water Resources Control Board	NPDES Quarterly Report (Oct-Dec)	Quarterly	1/28/2025
State Water Resources Control Board	NPDES monthly reports	Monthly	1/29/2025
Various	Financial Statements Submittal	Annual	12/4/2024
Various	EE Training (See: Log EE_Training)	Monthly	12/12/2024

ITEM NO. RA6 NPDES ANNUAL REPORT

Recommendation
For the Committee's information only; no action is required.

Strategic Plan Linkage
1. **Regulatory Compliance:** Proactively meet or exceed regulatory requirements for protection of the environment and public health.
   b. Maintain consistent compliance with EBDA's National Pollutant Discharge Elimination System (NPDES) Permit.

Background
Each year at the end of January, EBDA is required by its NPDES permit to submit an annual report. The report provides a compendium of the status of EBDA's facilities, major projects undertaken by the Member Agencies, and discharge quality.

Discussion
EBDA's Annual Self-Monitoring Report is attached for the Commission's information.

2024 NPDES SELF-MONITORING PROGRAM ANNUAL REPORT

NPDES PERMIT NO. CA0037869

East Bay Dischargers Authority
City of San Leandro
Oro Loma Sanitary District
Castro Valley Sanitary District
City of Hayward
Union Sanitary District

January 28, 2025

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Section 1: Comprehensive Discussion of Treatment Plant Performance and Compliance

Major milestones and construction projects completed at the EBDA member treatment plants in 2024 included the following:

- Oro Loma/Castro Valley Sanitary Districts (OLSD/CVSan)
    - Installed new 580kW Tesla Megapack to shave peak energy loading from the utility. This is part of a new "micro-grid" battery system that ties all our energy producing equipment into one system. The stored energy will also assist with providing backup power to the treatment process in case of loss of utility connection. This will assist with continued operation of the treatment plant.
    - Continuing to operate a full scale sidestream nitrification process using Microvi's biocatalyst. As constructed, approximately 100,000 gpd of belt press filtrate is treated each day. The sidestream contains approximately 17% of the total influent nitrogen. To date, the process reduces ammonia concentrations by 70%. Staff continues to work to improve the performance with a 90% removal target. The process is designed to reduce ammonia to nitrite or nitrate, which is readily available for denitrification in the mainstream process. Staff is currently working on stress testing the system to test the limits of the technology.
    - Much of the Oro Loma Sanitary District's Capital Program spending has shifted to the collection system. The District is approximately 60% complete with its goal to replace 40 miles of sewer pipe by 2029 at an approximate cost of $60M. The District has completed five of ten planned contracts in 2024, with two currently actively in construction and one out to bid, and expects to award two more in 2025.
    - Oro Loma Sanitary District worked to improve chlorine dosing to EBDA by utilizing the EQ basin to remove peaks and valleys from our influent flow to maintain a chlorine residual setpoint at the disinfection channel.
    - Oro Loma Sanitary District is currently removing 98% ammonia from our influent flow. The District continues to monitor the process and evaluate ways to reduce the total nitrogen in their effluent.
- Union Sanitary District (USD)
    - Enhanced Treatment and Site Upgrade (ETSU) Program phase 1A construction is ongoing. The design for phase 1B is concluding and is expected to be out to bid early in calendar year 2025. Phase 1A will modify the existing aeration basins, add an 8th aeration basin, and relocate existing administrative/operations/maintenance buildings to allow for phase 1B to be built. Phase 1B will construct new secondary clarifiers, return activated sludge pump station (RAS), waste activated sludge pump station (WAS) and new effluent pump station, including new chlorine contact channels.

The completion of the ETSU program will allow USD to be an Early Actor with respect to nutrient removal.

- Construction of a new Standby Generator system is underway and is expected to be completed in 2025. Long lead times for electrical equipment have caused delays in the project's timeline. This project also includes an upgrade to a portion of the facility's electrical distribution system, specifically the replacement of Substation No. 2.
- Replacement of the WAS Gravity Belt Thickeners is in the design phase, aimed at upgrading aging solids process equipment.
- Rehabilitation of Primary Digester No. 6, the plant's second-largest digester, is currently in the design phase.
- The Solids System Evaluation is commencing to review the scopes for currently budgeted CIP projects and to integrate the findings from various recent studies into a cohesive plan for the plant's solids system. The scope will include the development of process optimization strategies, evaluation of alternative technologies, and consideration of future regulatory impacts.

- <u>City of Hayward</u>
  - The work for the Main Switch Board project began in early 2024. The 12KV Switch Gear replacement project was awarded to Carollo in late 2021 and since renamed the Main Switch Board project. While waiting for the long lead items, the contractors have been working on the demolition of old equipment in the building as well as other abandoned electrical equipment around the facility. The project is expected to be completed in early 2026.
  - The nutrient management upgrades and administration building design project was awarded to Brown and Caldwell in August of 2022. Design for the administration building was completed in 2024 and is currently out for bid. The construction project for the administration building will be awarded in the first quarter of 2025. Design for Phase II nutrient upgrades is 60% complete with 90% expected in the first quarter of 2025. Design should be completed by the end of 2025 and will be placed out to bid and awarded in early 2026.
  - BAAQMD issued the permit for the headworks biofilter in 2024, and the Headworks project is now complete.
  - The North Vacuator was removed from service and inspected. It was determined that a major overhaul was needed. The project was put out to bid in the fourth quarter of 2024 and will be awarded in January 2025. Repairs will begin in Spring 2025 and with completion in the Summer of 2025.
- <u>City of San Leandro</u>
  - The City completed a 10-year Capital Improvement Program Plan for the treatment plant and collection system. The Plan delineates projects to extend the longevity of the current assets and recommends replacements

where needed. It also sets a strategy for preparing for additional nutrient reduction.

- The City contracted with HDR Engineering to create a nutrient reduction roadmap based on the specific nutrient load characteristics and treatment plant options. The project commenced in January 2025 and is expected to be completed in Q2 2025. The City expects to start contracting for implementation of the roadmap in late 2025.
- San Leandro City Council approved CEQA for the Treatment Wetland project in May 2024. A soil stabilization pilot test was completed in October 2024, which will inform the requirements for the full-scale project. Earthmoving for the project is expected in late summer 2025, with the remainder of the project scheduled for 2026, to allow time for the placed soil to settle before final grading.
- A microgrid battery system was installed in 2024 but was delayed due to PG&E permitting. Completion of the project is expected in 2025, with commissioning pending PG&E agreement. Digester and aeration improvements are expected to complete by late 2025.

EBDA's major projects in 2024 included the following:

- EBDA continues to implement its Asset Management Plan to ensure appropriate renewal and replacement of infrastructure. The estimated total restoration cost over 20 years is approximately $11.3 million. This includes $420,000 annually through 2030 (for a total of $4.2 million) that EBDA is contributing for capital improvements to the Union Effluent Pump station, per EBDA's Amended and Restated Joint Powers Agreement.
- EBDA advanced the Hayward Effluent Pump Station (HEPS) Pump Replacement project. This project to replace all four pumps and motors was awarded in January 2023, and pumps were delivered in December 2023, with installation beginning in early 2024. Two out of the four pumps have now been installed. Once the pump manufacturer clears the first two new pumps, we will start installation of the third new pump, with a target project completion date of October 2025.
- In August 2025, EBDA completed installation of a new actuator on the City of Hayward's Pond 3 valve. The new actuator has a feedback loop and SCADA interface, allowing for automated diversion of high flows to Pond 3. During wet weather storm events, having better information on SCADA greatly improves EBDA operations. The ability to automatically divert flow to Pond 3 saves EBDA the cost of pumping the flow to Pond 7, which requires using the HEPS pumps, and saves the City the cost of adding sodium hypochlorite to the diverted flow.
- EBDA has commenced the design of two new automatic transfer switches (ATSs) at the Oro Loma Effluent Pump Station (OLEPS). The two new ATSs will improve reliability of the pump station in the event of a power outage. If the PG&E power fails, the OLEPS emergency generator is the primary source of backup power.

Currently, if the emergency generator fails to start, operators can manually switch to the secondary source of backup power from OLSD. The installation of two new ATSs will allow the switch from primary to secondary backup to occur automatically. This ATS work is being completed as part of Phase Two of the OLEPS Electrical Upgrades. Replacement of the breakers and refurbishment of the Main Switchboard was completed in Phase One of the OLEPS Electrical Upgrades last year.

- In June 2024, EBDA replaced the main breaker at the Marina Dechlorination Facility (MDF). This was the first phase of the MDF Electrical Upgrade Project. The next phase includes replacement of the ATS electronic controls.
- Following the Water Board's adoption of the blanket permit amendment for total residual chlorine (TRC), EBDA turned off its continuous feed of sodium bisulfite (SBS) on January 2, 2024. EBDA implemented a new Chlorine Process Control Plan and programming at MDF to ensure that effluent consistently meets the new TRC limit of 0.98 mg/L as a one-hour average. The SBS savings at MDF have already been substantial. The following table shows SBS usage before and after the new TRC effluent limit implementation:

Year	SBS Gallons Used	SBS Expenditure
2023	163,208	$293,988
2024	12,230	$22,793

- EBDA continued its key role in the Transforming Shorelines Project. This project, funded by an EPA Water Quality Improvement Fund grant, includes design of a full-scale horizontal levee south of Oro Loma ("First Mile" project), continued research at Oro Loma's horizontal levee pilot, advancement of pilot wetlands projects at San Leandro and Hayward, and building capacity for nature-based solutions among Bay Area wastewater agencies. In close coordination with East Bay Regional Park District, Hayward Area Shoreline Planning Agency, and San Francisco Estuary Partnership, EBDA has been managing the First Mile project. In 2024, the First Mile team conducted a design charette with stakeholders, completed 30% design drawings and Basis of Design Report, and conducted several rounds of consultation with the Bay Restoration Regulatory Integration Team (BRRIT). The team was also successful in securing additional WQIF funding for the Pivot Points Project, which will fund final design and permitting of the First Mile. The new funding agreement was signed in November 2024, and the next phase of work under the new grant is kicking off in early 2025.
- EBDA has been working closely with Cargill, Inc. to develop a project that would deliver mixed sea salt brine from Cargill's solar salt ponds in Newark to EBDA's transport system for dilution and discharge. In 2023, EBDA's Commission approved an Environmental Impact Report (EIR) for the project, which is available here: https://ebda.org/projects/cargill-partnership/. Following EIR approval, Cargill made the decision to further evaluate an alternate pipeline route that goes along paths near the Bay instead of through City streets that are already congested with utilities. In 2024, Cargill confirmed the feasibility of connecting to EBDA's system

downstream of MDF to avoid corrosion impacts. EBDA expects to resume CEQA analysis in 2025, and Cargill projects construction beginning sometime between 2027 and 2029 depending on permitting, with operation commencing between 2031 and 2033.

- EBDA's Member Agencies recycled 859 million gallons in 2024, a 15% decrease from 2023. For consistency with recycled water totals submitted through GeoTracker, the totals presented below include in-plant reuse.

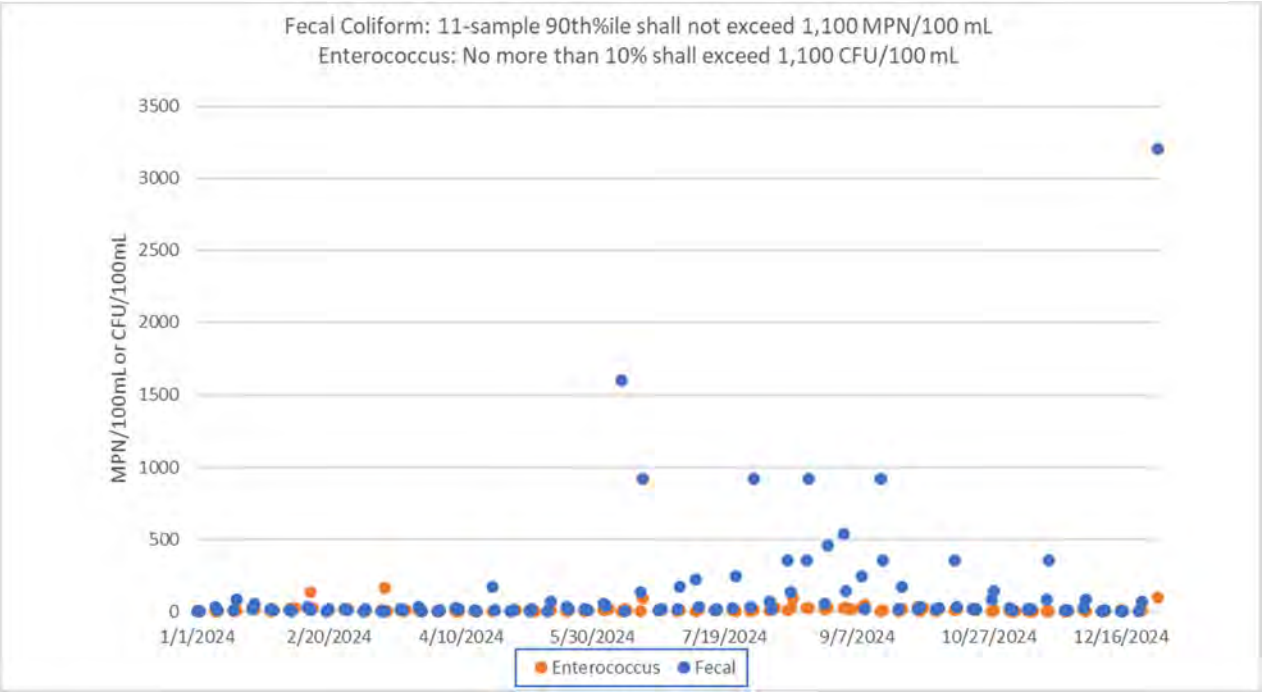
  As shown in the following table, including the LAVWMA agencies, water recycling accounted for nearly 3 billion gallons, about 12% of EBDA's outfall discharge last year of approximately 24.3 billion gallons. Overall, this slightly lower than last year's totals and ratio.

Agency	*2024 Recycled Water Production (MG)*
Hayward	440
San Leandro	30
EBDA Skywest Project	9
Oro Loma Sanitary District	18
Union Sanitary District	362
EBDA Total	**859**
Livermore	485
Dublin San Ramon Services District (DSRSD)	1569
LAVWMA Total	**2054**
Grand Total	**2913**

Bacterial Compliance

The chart that follows presents pathogen data from samples through the year. Note that permit limits are calculated as monthly geometric means or monthly 90%ile samples. Sporadically, at random intervals, a high sample can be detected. This outcome is probably due to the sloughing of pipe biofilms into the sample line. These non-representative events are why permit compliance is determined by geometric means. EBDA and its member agencies worked hard over the past few years to improve chlorine dosing to prevent periodic increases in bacterial contamination, which had occurred in prior years. This increased attention to chlorine dosing has led to consistent compliance with limits. That said, EBDA spends a considerable amount on chlorine to ensure that occasional high fecal coliform values do not compromise compliance, and therefore, we look forward to the removal of fecal coliform limits from our permit, consistent with Basin Plan revisions that were made subsequent to permit adoption.

Figure 1 – EBDA Bacterial Contaminant Performance



Section 2: List of Analyses for Which the Discharger Is Certified

EBDA conducts no analyses of its own. Each member agency is certified by the State Water Resources Control Board for standard water quality tests such as BOD, TSS, pH, DO, enterococcus, and fecal coliform. City of San Leandro staff performs these analyses on the combined effluent. Beginning in 2024, Oro Loma Sanitary District allowed their ELAP certification to lapse, and all compliance samples were analyzed by certified contract laboratories.

All metals and organics analyses are performed by the Authority's contract laboratory, Caltest Analytical Laboratory. Caltest's lab is certified for these analyses. Caltest subcontracts for analytical work on some items, including dioxin and furan compounds and PCBs, to other certified labs.

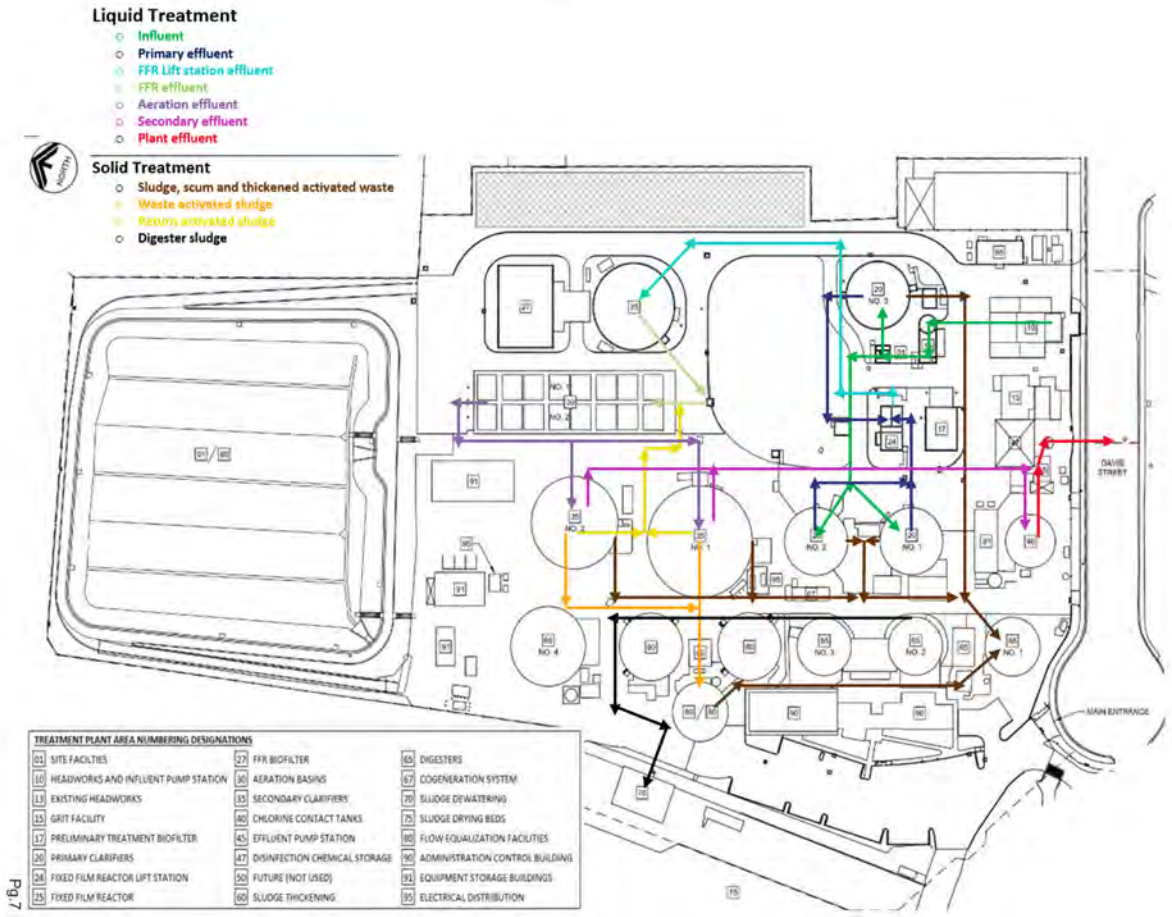
Pacific Eco-Risk (PER), also a certified laboratory, conducts the required acute and chronic toxicity testing for the Authority.

Copies of all laboratory reports are maintained on file at the Authority's office and are available for review upon request. Said reports are not included in this report.

Section 3: Plan View Drawing or Map Showing the Discharger's Facility, Flow Routing, Sampling and Observation Station Locations

Marina Dechlorination Facility

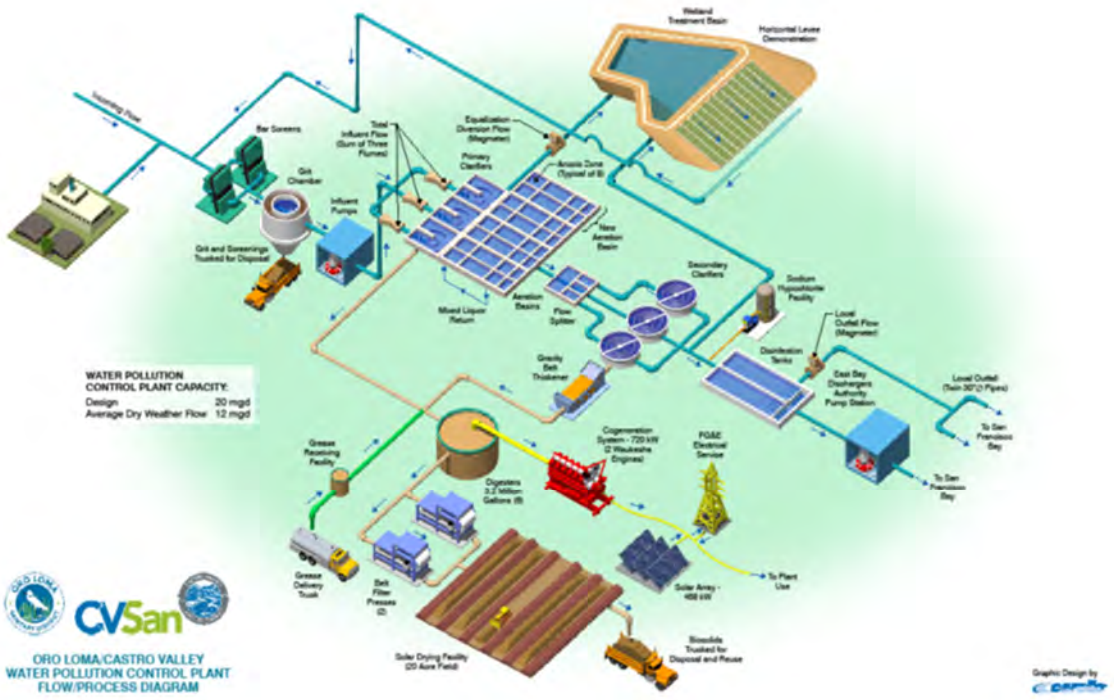
San Leandro Plant – Process Flow Diagram



Pg.7

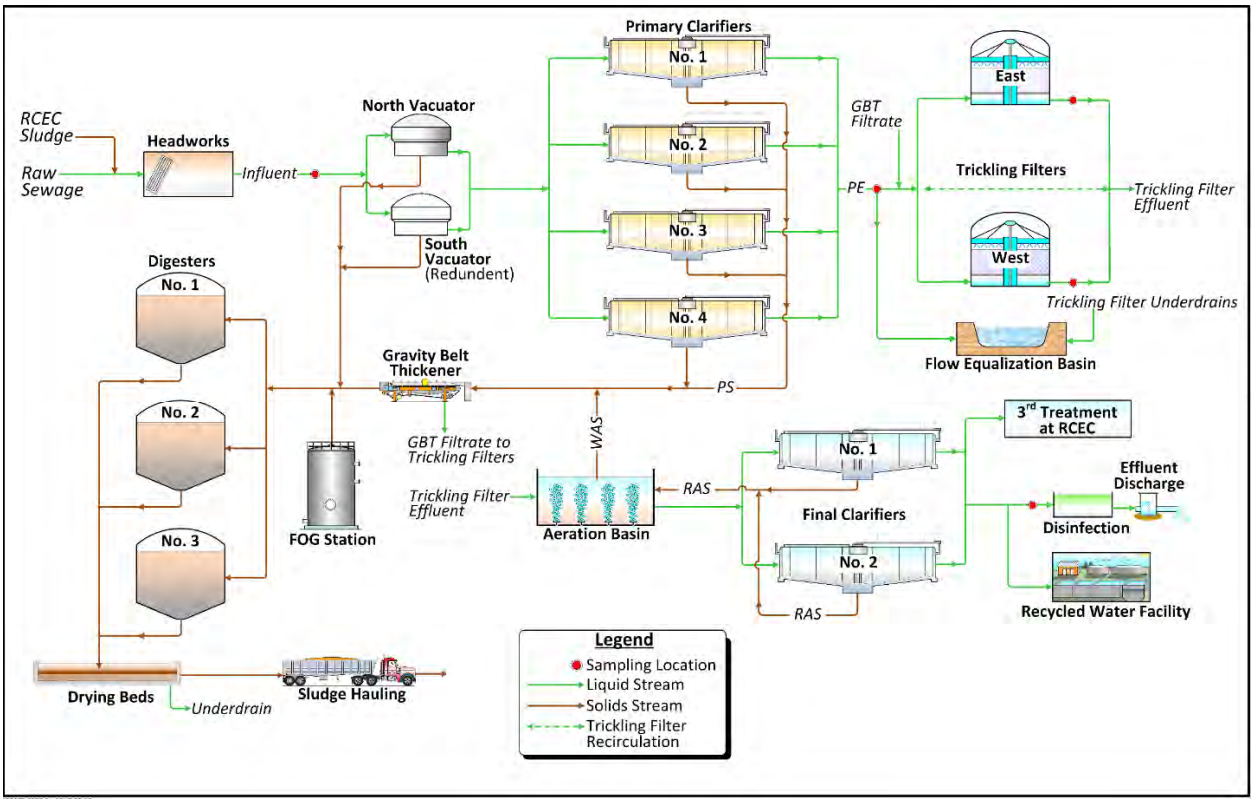
San Leandro Plant – Sampling Locations

OLSD/CVSan Plant – Process Flow Diagram



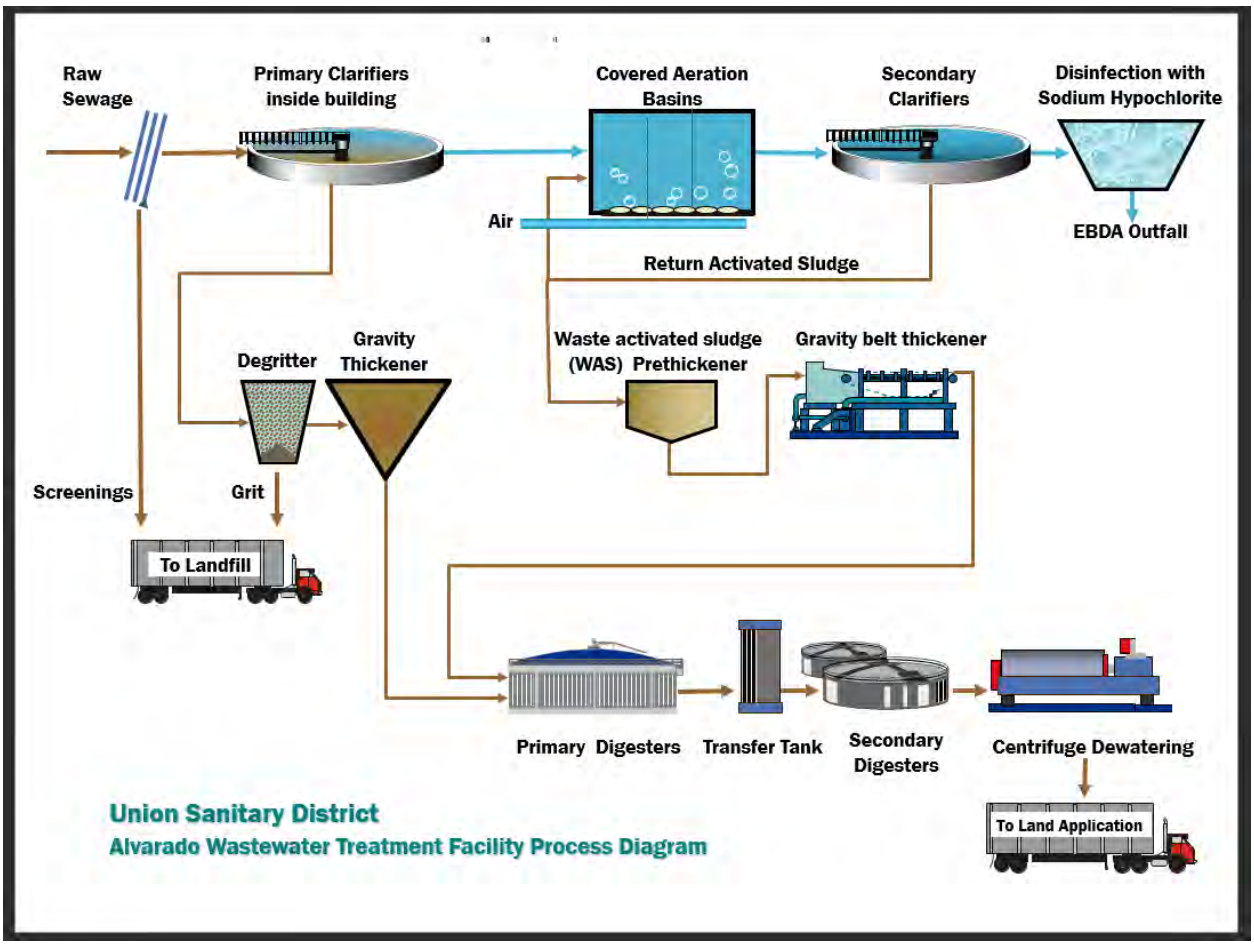
OLSD/CVSan Plant – Sampling Locations

Hayward Plant – Process Flow Diagram



Hayward Plant – Sampling Locations

USD Plant – Process Flow Diagram



USD Plant – Sampling Locations

Section 4: Results of Facility Report Reviews

The tables in this section summarize the status of reviewing and updating the following documents: Operations & Maintenance (O&M) Manual, Contingency Plan, Spill Prevention Plan, and Wastewater Facilities Status Report.

EBDA Facilities

Document	Review Date	Review Procedures	Planned Actions	Schedule
O&M Manual	Jan 2025	Updated on an as-needed basis and reviewed annually by the EBDA O&M Manager. .	The Authority maintains a comprehensive O&M Manual for the joint-use facilities. Chapters of the Manual are regularly reviewed and updated. EBDA's Wet Weather SOP is reviewed annually and updated as needed. In January 2024, the O&M Manual was updated to incorporate a revised Chlorine Process Control Plan for the Marina Dechlorination Facility, consistent with Order No. R2-2023-0023. The Plan describes the process for ensuring that residual chlorine is zero at EBDA's discharge to the Bay, which occurs at the diffusers 37,000 feet offshore 23.5 feet under the water surface.	Performed annually
Contingency Plan	Jan 2025	Updated annually by EBDA O&M and Administration Managers. EBDA is included in the Alameda County's Office of Emergency Service's Utility Unit.	The Emergency Operating Contingency Plan is supported by Operations & Maintenance Agreements between Member Agencies, which are compatible with their existing plans and known to all other local and county agencies for emergency purposes. Operation and maintenance activities are contracted with the Member Agencies for routine work. Emergency work is performed sometimes by Member Agencies and sometimes through contracts with private specialty firms.	Performed annually
Spill Prevention Plan	The SPCC Plan was updated in April of 2024.	Reviewed annually by EBDA O&M Manager	No major changes planned for 2025.	Performed as needed
Wastewater Facilities Status Report	Jan 2025	EBDA continues to implement a comprehensive Renewal and Replacement Program. The Authority has an Asset Management Plan that covers all critical equipment.	In 2024, EBDA completed the following projects: • UEPS payment #4 of 10 for a total of $4.2 M • MDF Main Breaker Replacement • Hayward Pond 3 Valve Actuator Replacement In 2025, the Authority is continuing work on the following upgrades to the EBDA system: • HEPS Pump Replacement Project • OLEPS ATS Replacement	Anticipated Completion: HEPS Pump Replacements, October 2025 OLEPS ATS Replacement, June 2026

San Leandro Treatment Plant

Document	Review Date	Review Procedures	Planned Actions	Schedule
O&M Manual	Sections assigned and updated throughout the year	O&M manuals and SOPs are written and revised as necessary by designated Plant Operators and reviewed by the Operations Supervisor and Plant Manager	Review O&M chapters and SOPs as needed. Continue developing and revising SOPs for plant processes. Additional chapters have been added to the Online O&M Manual and SOPs have been organized for easy access in SharePoint	Performed continuously
Contingency Plan	January 2024	WPCP management reviews, edits and approves	Current contingency plan updated as needed with changes. A significant revision is planned for 2024 with more detailed plans for specific scenarios.	Performed annually
Spill Prevention Plan	November 2023	WPCP management reviews, edits and approves	Currently up to date. No major changes planned for 2025	Performed as needed
Wastewater Facilities Status Report	January 2024		Capital Improvement Project Plan completed in October 2024. Urgent projects identified in the plan are currently in design. Annual Street Overlay and Sewer Point Repair Project is in design. Construction will be completed for microgrid battery backup system and other energy efficiency improvements, pending review by PG&E. Treatment Wetland Pilot Mixing Project successfully completed in 2024. Earthmoving is scheduled for 2025 with piping and installation scheduled for 2026. This project will treat approximately 20% of the ADWF to remove nitrogen and other contaminants through both technological and nature-based processes.	Maintenance and project schedule for 2024

Oro Loma/Castro Valley Sanitary District Treatment Plant

Document	Review Date	Review Procedures	Planned Actions	Schedule
O&M Manual	Ongoing	Continual reviews and revisions as necessary when new processes come online or when modifications are made to current processes.	The District has completed developing a computer based training program for the 25 unit processes in the treatment plant (including the EBDA OLEPS pump station). Staff will continue to train on the modules.	Ongoing
Contingency Plan	November 2024	Management team completed its review and updated document to reflect changes in contact information or equipment/facility changes.	Continue to make updates as needed, at least annually.	Annually
Spill Prevention Plan	April 2024	The District performed a significant update to its plan in 2022 to reflect administrative audit findings from CUPA. It was updated again in 2024 to reflect updated staff members.	Currently up to date and will update as necessary.	As needed
Wastewater Facilities Status Report	January 2024		The District continues to execute its planned 10-year, $168M capital program. The program includes extensive sewer pipe renewal (1.5% of system/year; the District is working to replace 40 miles (15%) of its 271-mile collection system by 2029), Digester Design and Cothickening improvements are underway and will likely be in construction in 2025, and Cogeneration System Replacement in 2030. By the end of 2024, the District had completed 60% of the construction to replace 40 miles of the collection system and began the design for the Digester Rehabilitation Project.	10-Year Capital Plan (Updated December 2024)

Hayward Water Pollution Control Facility

Document	Review Date	Review Procedures	Planned Actions	Schedule
O&M Manual	Ongoing	COH WPCF electronic O&M manuals, including SOP's, are reviewed and updated throughout the year by staff. Revisions are made to Sections and SOP's	Create new SOPs as required and review and update older SOPs throughout the year. Continually review and update O&M sections. Brown and Caldwell will be looking into a fully revised O&M as part of the nutrient management project.	SOP's and O&M sections are reviewed continuously
Contingency Plan	January 2025	The entire plan is reviewed by the WPCF manager with updates and edits made by the Senior Secretary.	Continue to make updates as needed.	Performed annually
Spill Prevention Plan	January 2025	Plan reviewed by WPCF Manager every January. Changes made by Senior Secretary.	Make updates as needed.	Performed annually
Wastewater Facilities Status Report	January 2025	The phase II Facilities Plan was completed in 2020. The city will implement projects as recommended in the 2020 Phase II Facilities Plan.	Complete Capital Improvement Projects according to the 10-year Master Plan CIP. Planned for 2025: • The replacement of the effluent pumps will be completed in 2025. • Construction of the new MSB replacement project will continue. • The admin building project design will go out to bid Q1 and construction will begin in late 2025. • The EQ basin project has been added to the Nutrient Upgrade project. • The phase II nutrient upgrade design will continue in 2025.	10-year Master Plan CIP planning changes are made every year in July with mid-year adjustments made in January/February

Union Sanitary District Treatment Plant

Document	Review Date	Review Procedures	Planned Actions	Schedule
O&M Manual	Ongoing	Plant O&M documents are incorporated into the District's Competency-Based Training Program. USD utilizes Microsoft Sharepoint software to track document review.	Plant management reviews training documents and SOP's as changes occur (i.e., following construction) or as scheduled.	Each individual training module and SOP has a review frequency of 3 years.
Contingency Plan	December 2024	Plant Manager reviews and updates the Contingency Plan annually.	None. Contingency Plan was updated in December 2024.	Complete next review by December 2025.
Spill Prevention Plan	December 2024	Spill Prevention Plan is incorporated into our Contingency Plan and is reviewed at the same time.	None. Spill Prevention Plan was reviewed in December 2024.	Complete next review by December 2025.
Wastewater Facilities Status Report	December 2024	USD's Master Plans address most of the Facilities Evaluation requirements. Our Plant Master Plan is updated every 5 years and Pump Station and Collection System Master Plans are updated as needed. Asset management data is updated on an ongoing basis. CIP and Operating plans and budgets are reviewed and revised annually. **2024 Projects Completed/in-progress:** • Standby Power Upgrade (Construction in progress) • Plant Miscellaneous Improvements (Construction in progress) • Alvarado Influent Valve Box Improvements (Construction in progress) **ETSU: Phase 1A:** • Aeration Basin Modification (Construction in progress) • Campus relocation (Construction in progress)	Complete capital improvements in accordance with 20-year CIP plan. Implement annual rate adjustments for Sewer Service Charges and Capacity Fees in accordance with 10-year financial plan. **2025 Projects Planned:** • WAS Gravity Belt Thickener (In Design) • Anaerobic Digester #6 Rehab (Construction to begin) • Electrical Switchboard and MCC Replacements (In Design) • Gravity Thickener 1&2 Rehab (In Design) **ETSU: Phase 1B:** • New Secondary Clarifiers (Construction to begin) • New Effluent Pump Station (Construction to begin) • New RAS/WAS Pump Station (Construction to begin)	20-year CIP annual update in June. **Master Plans:** • Alvarado Basin MP 2023-25 • Newark Basin MP 2025-27 • Irvington Basin 2027-29 • Pump Station Asset Condition Assessment 2028-31 • Plant Asset Condition Assessment 2025-27 • Plant Solids System/Capacity Assessment 2032-34 • Solids System Evaluation 2025-26

Section 5: BACWA Watershed Permitting and Monitoring

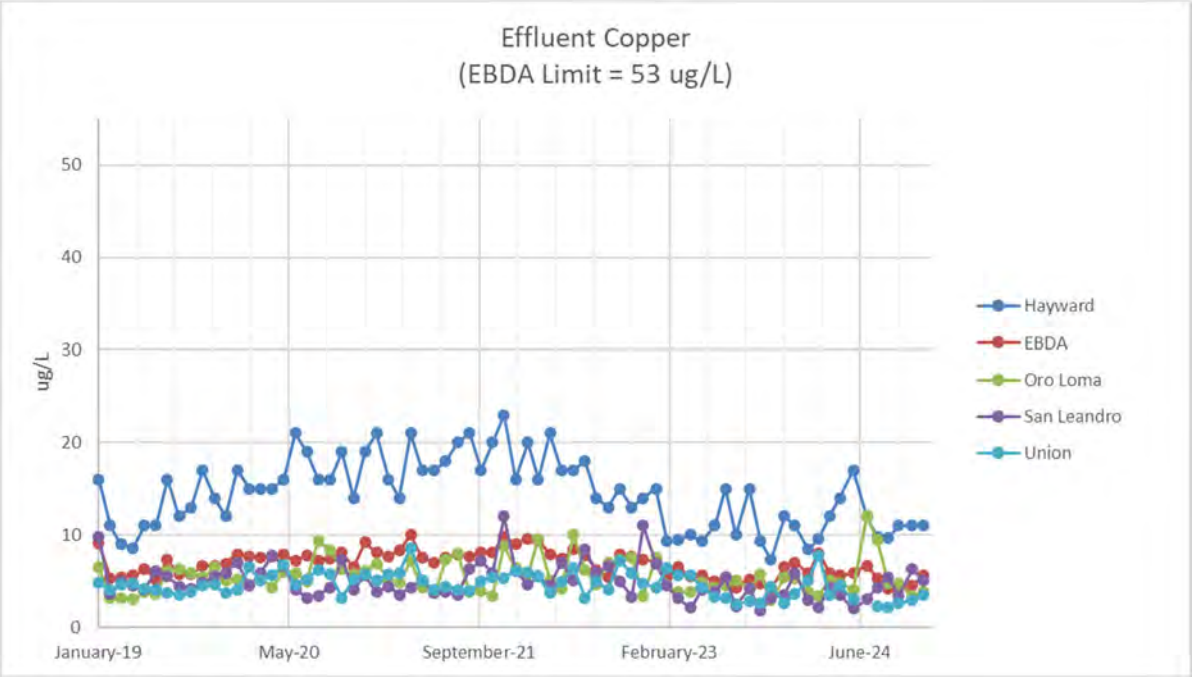
EBDA participates in a number of group processes coordinated by the Bay Area Clean Water Agencies (BACWA) to fulfill permit requirements, including Receiving Water Quality Monitoring, TMDL/SSO Support, Mercury and PCBs Watershed Permit Support, Nutrients Watershed Permit Support, and Implementation of Copper Action. Participation in these items is described in an annual BACWA letter to the Regional Water Board found here:
https://bacwa.org/document/bacwa-npdes-permit-letter-for-calendar-year-2024/

Section 6: Effluent Characterization Study and Report

EBDA regularly monitors and evaluates discharges from the common outfall and each contributing plant's effluent to identify any concerning trends. No significant increases over past performance were noted in 2024 data.

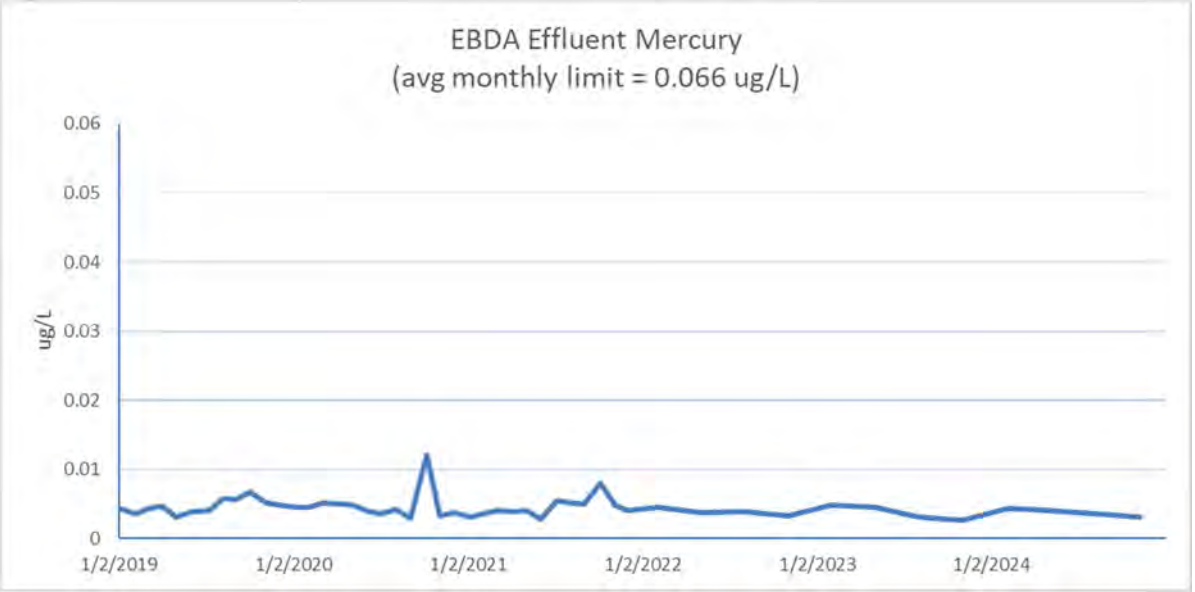
EBDA's five-year trend for copper shows that while individual member agency effluent concentrations have varied, EBDA's common outfall concentration consistently averaged less than 20 ppb, versus a permit limit of 53 ppb (see Figure 3).

Figure 3 – Effluent Copper Trend



EBDA's effluent mercury concentrations also continue to be well below permit limits, as shown in Figure 4.

Figure 4 – Effluent Mercury Trend



ITEM NO. RA7 PFAS UPDATES

Recommendation
For the Committee's information only; no action is required.

Strategic Plan Linkage

C. **Regulatory Compliance:** Proactively meet or exceed regulatory requirements for protection of the environment and public health.
   a. Represent EBDA and the Member Agencies' interests by preemptively engaging in development of emerging regulations and permits and advocating for reasonable, science-based decisions.
   e. Track and share scientific and regulatory developments related to emerging contaminants, and advocate for source control.

Background
Per- and polyfluoroalkyl substances (PFAS) are a large group of human-made substances that are very resistant to heat, water, and oil. PFAS have been used extensively in surface coating and protectant formulations. Common PFAS-containing products are non-stick cookware, cardboard/paper food packaging, water-resistant clothing, carpets, and fire-fighting foam. All PFAS are persistent in the environment, can accumulate within the human body, and have demonstrated toxicity at relatively low concentrations. Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS), two of the most common PFAS compounds, were found in the blood of nearly all people tested in several national surveys.

The regulatory and legislative landscape for drinking water, wastewater, and biosolids has been evolving quickly over the last several months, as has public awareness. This report summarizes the current status of key initiatives.

Discussion
Drinking Water Regulation
As discussed at previous Committee meetings, regulatory efforts to address PFAS to date have primarily focused on drinking water in order to minimize human ingestion of these chemicals. On April 10, 2024, EPA finalized Primary Drinking Water Standards for six PFAS chemicals, establishing enforceable maximum contaminant levels (MCLs) and unenforceable maximum contaminant level goals (MCLGs):

	MCLG	**MCL**
Perfluorooctanoic acid ("PFOA") Perfluorooctane sulfonic acid ("PFOS")	Zero	4 ppt
GenX Chemicals Perfluorohexane sulfonic acid ("PFHxS") Perfluorononanoic acid ("PFNA") Hexafluoropropylene oxide dimer acid ("HFPO-DA")	10 ppt	10 ppt

Mixtures containing two or more GenX or perfluorobutane sulfonic acid ("PFBS")	1 (unitless)*	1 (unitless)

** There is no unit for this this Hazard Index MCL because it is a sum of fractions. EPA is currently developing an online calculator that will add up each fraction that represents average PFAS ratios (e.g., PFHxS/10 ppt + PFNA level/10 ppt) and see if the annual average is greater than the MCL of 1.*

In California, public water systems will also be required to comply with California MCLs, which will be based on the new OEHHA public health goals (PHGs), adopted by California's Office of Environmental Health Hazard Assessment (OEHHA) on April 5, 2024:

	California Public Health Goal
PFOA	0.007 ppt
PFOS	1 ppt

While the proposed MCLs are of obvious concern to drinking water agencies, they are unlikely to directly affect EBDA or our members' wastewater operations. Where wastewater facilities discharge into waterbodies that have the potential to be drinking water sources, there is a chance that the MCLs could be implemented as effluent limits in wastewater permits.

Human Health Water Quality Criteria

Because EBDA discharges to the Bay, any limits on EBDA's effluent would be driven by the potential for impacts to aquatic ecosystems or fish consumption. In December 2024, EPA released draft criteria for human health protection based on fish consumption and water consumption for PFOA, PFOS, and perfluorobutane sulfonic acid (PFBS). The levels, summarized in the table below, are more than 100 times below observed concentrations in rain and are lower than current detection limits.

Table 1. Draft Human Health Criteria (HHC) for Three PFAS.

PFAS	Water + Organism HHC (ng/L; ppt)[1]	Organism Only HHC (ng/L; ppt)[1]
PFOA	0.0009	0.0036
PFOS	0.06	0.07
PFBS	400	500

[1] Values are provided in ng/L units to aid in comparison to method detection limit (MDL).

Human health criteria are not regulatory requirements and do not, on their own, compel any action. They are information for entities, including state regulators, to consider when making policy decisions that protect water quality. In this case, the "Organism Only" criteria could apply to San Francisco Bay if adopted by California, for example into the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). EBDA staff understands that the OEHHA is working on their own criteria that would be also be

considered in any rulemaking.

Hazardous Waste Regulation

As of July 2024, PFOA and PFOS are now designated as hazardous substances under the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) – also known as the Superfund law. The intent of this approach by the U.S. Environmental Protection Agency (EPA) is to invoke a "polluter pays" principle, forcing the chemical companies that produce PFAS compounds to take responsibility for cleaning them up. The Superfund law works by triggering cleanups once contamination exceeds EPA thresholds, and another provision allows the agency to sue for cost recovery. However, the wastewater sector and other industries that are passive receivers of PFAS have argued that we should not be subject to these requirements.

There are unlikely to be any immediate ramifications to wastewater agencies from this designation because the default reportable quantity is one pound per day for PFOA and PFOS, a mass which is unlikely to be reached in wastewater agencies' biosolids or effluent. The rule adoption was also accompanied by an Enforcement Discretion and Settlement Policy that makes clear that "EPA does not intend to pursue entities where equitable factors do not support seeking response actions or costs under CERCLA, including farmers, municipal landfills, water utilities, municipal airports, and local fire departments." However, the wastewater sector is continuing to push for an exemption to counter the risk that the reportable quantity could be lowered in the future. Several bills sponsored by the National Association of Clean Water Agencies (NACWA) are aimed at excluding wastewater agencies from liability.

Biosolids Regulation

On January 14, 2025, EPA released its Draft Sewage Sludge Risk Assessment for PFOA and PFOS (see attached EPA Fact Sheet). The Risk Assessment looked at the risk associated with PFOS and PFOA for a hypothetical farm family exposed to PFAS through land application of biosolids on their property. Based on their modeling, which draws on a very limited set of publications, EPA found that there may be human health risks exceeding the EPA's acceptable thresholds when land-applying sewage sludge that contains 1 part per billion (ppb) of PFOA or PFOS. 1 ppb is considerably lower than the PFAS concentrations found on average in biosolids.

What the draft Risk Assessment fails to do is to put in context the risks that individuals on a farm or elsewhere face from background levels of PFAS found in their food packaging, clothing, cookware, carpeting, and other common sources. Direct home exposure is likely much more significant than biosolids exposure. In addition, the water, fish, and other consumables that EPA assumes the family is eating from their farm would be contaminated with PFAS at background levels above those assumed to be stemming from the biosolids.

In its communication about the Risk Assessment, EPA posits that wastewater treatment

plants can control PFAS in biosolids through source control. However, studies in the Bay Area and elsewhere indicate that in areas without PFAS manufacturing or other industrial uses, the primary inputs of PFAS to wastewater systems come from residential and commercial sources – essentially from consumer products – making it essentially impossible for wastewater agencies to take a source control approach.

The California Association of Sanitation Agencies (CASA) has commissioned an expert panel of academic researchers to review the draft Risk Assessment and develop comments. These comments will be summarized in a template comment letter that will be circulated for agencies to submit in advance of EPA's comment deadline of March 17, 2025. EBDA staff will work with the Managers Advisory Committee (MAC) on a comment strategy.

It is unclear given the posture of the new administration whether the Risk Assessment will be finalized. If it is, the next step would be development of regulations to manage land application of biosolids to reduce risk to acceptable levels. Typically, such management actions are released coincident with the Risk Assessment. However, this draft Risk Assessment was released earlier to meet a 2024 Congressional deadline.

A fact sheet on PFAS in biosolids released by the National Association of Clean Water Agencies (NACWA) in response to the draft Risk Assessment is attached for reference.

Industrial Effluent Limits

Consistent with their assertion that the best approach to managing PFAS in effluent and biosolids is source control, in January 2023, EPA put forward a program plan for Effluent Limitations Guidelines (ELGs) for PFAS. ELGs contain limits for certain industrial categories that can be enforced through wastewater agencies' pretreatment programs. EPA was considering ELGs for the following categories:

- Landfills
- Textile mills
- Metal finishers
- PFAS manufacturing facilities
- Pulp, paper, and paperboard
- Airports

EPA sent its draft PFAS ELGs to the White House in June 2024 for mandatory pre-release review. That process typically takes 90 days, but the PFAS rules had stalled. On January 21, 2025, the US Office of Management and Budget (OMB) withdrew the EPA's proposal for ELGs for PFAS Manufacturers Under the Organic Chemicals, Plastics and Synthetic Fibers Point Source Category, in line with Trump's executive order freezing new regulations pending review. Next steps for EPA on this are unclear at this time.

California Legislation

As noted above, because we are receivers of PFAS, the wastewater community is primarily focused on source control rather than treatment as the most effective way to address PFAS in the environment. CASA has been working with a consortium of environmental advocacy partners, including Environmental Working Group, to sponsor and support legislation targeted at companies producing products containing PFAS. While several bills approved by the legislature over the past several years that banned added PFAS in certain classes of products were vetoed by Governor Newsom, citing state agency cost concerns, a number of others are now on the books:

- **Cosmetics.** Starting January 1, 2025, the Toxic-Free Cosmetics Act of 2020 (AB 2762) and the PFAS-Free Beauty Act of 2022 (AB 2771) ban intentionally added PFAS in cosmetics sold in California.
- **Textiles.** As of January 1, 2025, the California Safer Clothes and Textiles Act of 2022 (AB 1817) prohibits intentionally added PFAS in most clothing and textiles sold in California.
- **Juvenile Products.** Beginning July 1, 2023, intentionally added PFAS is banned in juvenile products sold in California, such as high chairs, strollers, and car seats (AB 652).
- **Food Packaging.** The California Safer Food Packaging and Cookware Act (AB 1200) banned the sale of paper-based food packaging containing PFAS chemicals starting in 2023.
- **Menstrual Products.** Beginning in 2029, AB 2515 prohibits the sale of menstrual products containing PFAS in California.
- **Carpets and Rugs.** In 2021, the California Department of Toxic Substances Control (DTSC) adopted regulations for PFAS in carpets and rugs.
- **Textile and Leather Treatments.** In 2022, DTSC adopted regulations for PFAS in treatments for carpets, upholstery, clothing, and shoes.

CASA and its environmental partners sponsored a bill last session, SB 903 (Skinner), that would have prevented the sale and use of products containing PFAS unless the use of the PFAS in the product is necessary and there is not a safer alternative available. It would have banned the sale of products containing PFAS by 2030, and would have set up a process at DTSC allowing manufacturers to petition for the Department to determine whether the presence of PFAS in their product is a currently unavoidable use. Unfortunately, the Appropriations Committee's fiscal analysis cited $10 million annually and 44 positions at DTSC to implement the program, effectively killing the bill in a year of budget shortfall. CASA and partners have been working with DTSC staff to identify changes to the bill that would bring costs down and plan to reintroduce it this year.

Meanwhile, CASA staff has been contacted by several state legislators who have been moved by recent media coverage about risks of PFAS in biosolids, coupled with the EPA draft Risk Assessment, and who are considering introducing legislation on that topic. It is not clear yet what form legislation on PFAS in biosolids may take, and more will be

understood in the coming months once a bill is introduced. CASA is working with legislative staff to try to counter any harmful proposals, focusing on the fact that land application of biosolids is a common practice regulated under the Clean Water Act that has significant benefits for agriculture and the environment, and that banning or significantly limiting biosolids land application would lead to higher greenhouse gas emissions from synthetic fertilizer use and biosolids transport to landfills.

Research

To better inform the wastewater community's proactive approach to reducing PFAS in the environment, as well as to counter legislative and regulatory actions based on incomplete information, wastewater agencies are continuing to actively support several research projects, including the following:

- National Collaborative PFAS Study: Dr. Ian Pepper at the University of Arizona is leading a team conducting field studies across the U.S. investigating the fate and transport of PFAS on sites applied with biosolids. The team is looking at a variety of soils, climates, and depth to groundwater. A preliminary report was released on January 17, 2025. Findings to date show very little transport of PFAS from biosolids offsite or into groundwater, and PFAS concentrations decreased with increased soil depth. Sites were <1 ppb, regardless of land application loading rate. Concentrations were less than or close to soil screening levels (i.e., the levels considered safe for groundwater protection). Control plots also had measurable PFAS concentrations. Phase 2 will evaluate the potential for crop uptake of PFAS following land application of biosolids.

- U.C. Davis Crop Uptake Study: Dr. Tom Young at U.C. Davis published a paper on January 26, 2025 summarizing his work evaluating uptake of PFAS to dry-farmed oats. This study, which was partially funded by the Bay Area Biosolids Coalition, looked at three sites within 10 miles of each other, one that had received biosolids since 1978, one that had received biosolids since 2017, and one that had not had biosolids. 33 PFAS compounds were measured in the oats, biosolids compost, and soil, and no PFAS were found in the oats at any of the sites, indicating that there was not crop uptake.

- PFAS Sources to Solutions Project: Building on work they completed in 2022 evaluating PFAS concentrations in the Bay and from wastewater treatment plants, San Francisco Estuary Institute (SFEI) is now leading an EPA-funded project called PFAS: Sources to Solutions. The goals of this project are to seek meaningful management actions for PFAS inputs to the Bay. Work will include developing a conceptual model that maps PFAS transport from products to the Bay via runoff and wastewater and identifying product categories most likely to be major contributors to PFAS in wastewater and urban stormwater runoff.

FACT SHEET

Draft Sewage Sludge Risk Assessment for PFOA and PFOS: Information for Wastewater Treatment Plants

January 2025

This fact sheet contains information that may be useful to operators of wastewater treatment plants (WWTPs) in addressing perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) contamination in sewage sludge.

On January 14, 2025, the U.S. Environmental Protection Agency (EPA) released its Draft Sewage Sludge Risk Assessment for Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS). The draft risk assessment indicates that in some scenarios, the EPA's acceptable risk thresholds may be exceeded when sewage sludge containing PFOA and PFOS is land applied for beneficial reuse or surface disposed. The draft risk assessment focuses on people living on or near impacted farms or those that rely primarily on their products. The findings presented in the draft risk assessment are preliminary. The EPA expects to publish a final risk assessment after reviewing public comments and revising the draft risk assessment accordingly. Once finalized, the risk assessment will provide information on risk from use or disposal of sewage sludge and will inform the EPA's potential future regulatory actions under the Clean Water Act (CWA). The EPA is committed to partnering with states, Tribes, territories, and wastewater treatment plants (WWTPs) to reduce risks from PFOA and PFOS that may occur through the management of sewage sludge, including the land application of sewage sludge.

What are sewage sludge and biosolids?

When sewage from households and businesses is sent to a WWTP, the liquids are separated from the solids, producing a nutrient-rich product known as "sewage sludge." The EPA typically uses the term "biosolids" to refer to treated sewage sludge that is intended to be applied to land as a soil conditioner or fertilizer. Sometimes biosolids are distributed to farms. While some states, Tribes, or counties may have additional rules around the use of biosolids, federal rules currently allow biosolids to be applied to pastures, feed crops, and crops for direct human consumption. Biosolids can also be applied to forests, tree farms, golf courses, turf farms, and other types of land. In other cases, biosolids are bagged and sold at stores to the general public and are often used on lawns or in home gardens. Not all WWTPs create biosolids for land application; some incinerate sewage sludge and others send it to a landfill. Biosolids are different from manure or industrial sludge (like pulp from a paper mill), which are also sometimes used as a soil amendment. The EPA does not regulate the land application of manure or industrial sludges in the same manner it does for biosolids.

What are PFOA and PFOS?

PFOA and PFOS are two chemicals in a large class of synthetic chemicals called per- and polyfluoroalkyl substances (PFAS). PFOA and PFOS have been widely studied, and they were once high production volume chemicals within the PFAS chemical class. PFOA and PFOS tend to persist in the environment for long periods of time and have been linked to a variety of adverse human health effects (*see* the EPA's Final Toxicity Assessment for PFOA and Final Toxicity Assessment for PFOS). PFAS manufacturers voluntarily phased out domestic manufacturing of PFOA and PFOS and their uses have been restricted by Significant New Use Rules (SNURs)

issued under the Toxic Substances Control Act (TSCA) (*see* the EPA's Risk Management for PFAS under TSCA). Though concentrations of PFOA and PFOS in people's blood have lowered since the voluntary phase out, blood levels can be elevated in communities where there is significant environmental contamination and exposure.

Learn more about PFAS, the EPA's PFAS Strategic Roadmap, and PFAS exposure in impacted communities.

Why is the EPA concerned about the presence of PFOA and PFOS in sewage sludge?

Although domestic manufacturing of PFOA and PFOS have been phased out and their uses restricted, multiple activities still result in PFOA, PFOS, and their precursors being released to WWTPs.[1] Traditional wastewater treatment technology does not remove or destroy PFOA or PFOS, and these chemicals typically accumulate in the sewage sludge. PFOA and PFOS have strong chemical bonds, which means they do not break down on their own in the environment or in our bodies. The chemicals can move from soils to groundwater or nearby lakes or streams, and be taken up into fish, plants, and livestock. These factors combine to raise questions about the potential risks associated with the presence of PFOA or PFOS in sewage sludge that is land applied as a soil conditioner or fertilizer (on agricultural, forested, and other lands), surface disposed, or incinerated.

What are the potential sources of PFOA and PFOS in sewage sludge?

Current and historical activities that can contribute PFOA and PFOS to sewage sludge include industrial releases (*e.g.*, certain types of firefighting foam, pulp and paper plants), commercial releases (*e.g.*, car washes, industrial launderers), and down-the-drain releases from homes (*e.g.*, use of consumer products like after-market water resistant sprays, ski wax, floor finishes, laundering of stain or water-resistant textiles with PFOA or PFOS coatings). If products containing PFOA or PFOS are disposed of at a lined municipal solid waste landfill, because the most common off-site management practice for landfill leachate is to transfer it to a WWTP, then that landfill's leachate could be a source of PFOA and PFOS to a WWTP. Studies have found that PFOA and PFOS in sewage sludge even at WWTPs that only receive wastewater from residential and commercial users. At different WWTPs across the country, any of these release mechanisms might play a role in PFAS entering the plant and contaminating sewage sludge.

What is a sewage sludge risk assessment?

Risk assessment is a scientific process that is used to understand health risks to people, livestock, or wildlife across the country. The concentration of pollutants found in sewage sludge varies across space and time, depending on industrial and other inputs to individual WWTPs. The presence of a pollutant in sewage sludge alone does not necessarily mean that there is risk to human health or the environment from its use or disposal. The EPA uses sewage sludge risk assessments to help evaluate whether actions, including regulation, are needed to protect those who may experience risks from sewage sludge use or disposal. In this sewage sludge risk assessment, the EPA estimates potential human exposures and risks in modeled scenarios where sewage sludge has been land applied or surface disposed. The draft risk assessment focuses on risks to humans because available data indicate that people are much more sensitive to exposures to PFOA or PFOS than livestock or wildlife. Finally, this risk assessment does *not* assess risks to people in the general population, who often have a diversity of sources for their foods.

[1] *see* the EPA's Preliminary Effluent Guidelines Program Plan 16 and Multi-Industry Per- and Polyfluoroalkyl Substances (PFAS) Study – 2021 Preliminary Report

What does this draft sewage sludge risk assessment suggest?

The draft risk assessment focuses on those living on or near impacted sites (*e.g.,* farm families and their neighbors) or those that rely primarily on their products (*e.g.,* food crops, animal products, drinking water); the draft risk assessment does *not* model risks for the general public. Based on the modeling in the draft sewage sludge risk assessment, the EPA finds that there may be human health risks exceeding the EPA's acceptable thresholds for some modeled scenarios when land-applying sewage sludge that contains 1 part per billion (ppb) of PFOA or PFOS. The EPA also finds that there may be human health risks associated with drinking contaminated groundwater sourced near a surface disposal site when sewage sludge containing 1 ppb of PFOA or sewage sludge containing 4 to 5 ppb of PFOS is disposed in an unlined or clay-lined surface disposal unit. The EPA provides a qualitative description of the potential risks to communities living near a sewage sludge incinerator (SSI) in the draft risk assessment but does not provide quantitative risk estimates due to significant data gaps related to the extent to which incineration in an SSI destroys PFOA and PFOS and the health effects of exposure to products of incomplete combustion.

The draft risk calculations are not conservative estimates because (1) they model risk associated with sewage sludge containing 1 ppb PFOA or PFOS, which is on the low end of measured U.S. sewage sludge concentrations (2) reflect median exposure conditions (*e.g.,* 50th percentile drinking water intake rates) rather than high end exposure conditions, (3) do not take into account non-sewage sludge exposures to PFOA and PFOS (*e.g.*, consumer products, other dietary sources), (4) do not account for the combined risk of PFOA and PFOS, and (5) do not account for additional exposures from the transformation of PFOA and PFOS precursors. As such, risk estimates that account from multiple pathways, multiple sources of exposure, and multiple PFAS would be greater than presented in this draft assessment.

What is the recommended analytical method to measure PFOA and PFOS in sewage sludge?

The EPA recommends using EPA Method 1633 to measure 40 PFAS analytes, including PFOA and PFOS, in sewage sludge. EPA Method 1633 finished multi-laboratory validation and was finalized in January 2024. It is planned to be included in the upcoming Methods Update Rule 22, which was proposed in late 2024.

Learn more about EPA Method 1633 and Methods Update Rules.

What plans exist for PFAS monitoring in sewage sludge nationwide?

The EPA is currently planning the next National Sewage Sludge Survey (NSSS) in collaboration with the POTW Influent PFAS Study. The NSSS will focus on obtaining current national occurrence and concentration data for 40 target PFAS analytes using EPA Method 1633. The data generated by the NSSS will help inform future risk assessments and risk management actions for sewage sludge. A Voluntary Data Submission Portal also will be available throughout the duration of the POTW Influent PFAS Study and NSSS to collect more PFAS data nationwide.

Learn more about the National Sewage Sludge Survey and the POTW Influent PFAS Study.

What does this mean for WWTPs?

The draft risk assessment is not a regulation and does not compel action. The EPA's draft risk assessment indicates that each of the three common use or disposal options may result in elevated risk levels when sewage sludge with typical concentrations of PFOA or PFOS is managed. With the understanding that eliminating these risks is likely not possible at this time, the EPA recommends, in addition to pretreatment to reduce PFAS at the

source, that WWTPs consider management options or practices that can mitigate or lessen risks. The EPA recognizes that WWTPs may have constrained options for sewage sludge management and changes may not be possible, particularly in the near term. The EPA recommends working with your state and regional biosolids coordinators for support in sewage sludge management planning.

The EPA is continuing to recommend that WWTPs monitor sewage sludge for PFAS contamination, identify likely industrial discharges and other sources of PFAS, and implement industrial pretreatment programs where appropriate. Doing so will help prevent downstream PFAS contamination and lower the concentration of PFAS in sewage sludge as described in Section C of the EPA's December 2022 memorandum entitled, "Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs." Current science indicates that **lower levels of PFAS exposure present less risk**, so these efforts to identify and reduce PFOA and PFOS in sewage sludge help protect public health and the environment.

WWTPs may choose to evaluate whether additional risk mitigation actions are appropriate to reduce risk posed by certain sewage sludge use and disposal activities. To reduce potential risk associated with land application, consider land-applying in areas that may be less sensitive to PFOA and PFOS pollution, like areas far from fishable waters or with deep protected drinking water aquifers. Consider avoiding land application in fields used to graze livestock or grow feed, especially for dairy cows. Fields used to grow fruits and grain may be better alternatives to those growing hay or leafy greens like spinach or kale. To reduce potential risk associated with surface disposal of sewage sludge consider using disposal sites with composite liners and leachate collection and treatment systems (understanding how that leachate will be disposed or treated). To better understand potential risks from incineration of sewage sludge consider performance testing incinerators to gain information about potential releases of PFOA, PFOS, and other PFAS that may be generated through incomplete combustion. For example, a recently released air method, OTM-50, can help test emissions for more volatile products of incomplete combustion, in addition to using OTM-45 to monitor for PFAS emissions. For more information, please refer to the EPA's 2024 Interim Guidance on the Destruction and Disposal of PFAS and Materials Containing PFAS.

Are there innovative technologies available to remove and destroy PFAS in sewage sludge?

There are several emerging PFAS destruction technologies (*e.g.*, supercritical water oxidation, plasma gasification, pyrolysis and gasification coupled with a high-temperature thermal oxidizer) for sewage sludge. Most are still in the pilot-scale stage and further research is needed to evaluate potential products of incomplete destruction and capacity limitations. The EPA's 2024 Interim Guidance on the Destruction and Disposal of PFAS and Materials Containing PFAS discusses ORD's PFAS Innovative Treatment Team (PITT)'s research on innovative technologies, and includes a technology evaluation framework for further assessing emerging technologies.

Learn more about the EPA's ORD PITT research effort on innovative PFAS technologies.

Learn more about funding opportunities for capital projects to treat emerging contaminants through the Clean Water State Revolving Fund Emerging Contaminants.

What are the EPA's next steps after the final risk assessment is released?

After the public comment period has closed, the EPA will consider the comments received, revise the draft risk assessment as appropriate, and prepare a final risk assessment. The final risk assessment will help inform the

EPA's potential future regulatory actions under the Clean Water Act (CWA). If the final risk assessment indicates that there are risks above acceptable thresholds when using or disposing of sewage sludge, the EPA expects to propose a regulation under CWA section 405 to manage PFOA and/or PFOS in sewage sludge to protect public health and the environment. During the risk management deliberation process, the results of the final risk assessment may be integrated with other considerations, such as economic costs and treatment feasibility, to reach decisions regarding the need for and practicability of implementing various risk reduction activities.

Learn more about the EPA's recent actions to address PFAS in sewage sludge.

Review the EPA's Frequently Asked Questions on the Draft Sewage Sludge Risk Assessment for PFOA and PFOS.

Learn more about the EPA's Draft Sewage Sludge Risk Assessment for PFOA and PFOS.

The Current State of the Science & Regulations

PFAS in Biosolids

NACWA
THE VOICE FOR A CLEAN WATER FUTURE

PFAS are a large group of man-made chemicals. Many consumer and industrial products and processes have used PFAS for decades because of their ability to resist heat, water, and oil. Until these products are removed from the supply chain, PFAS chemicals will continue to make their way into wastewater and biosolids.

What we know

Biosolids are nutrient-rich organic materials generated when a wastewater treatment facility treats domestic sewage (i.e., treated sewage sludge). Publicly owned treatment works (POTWs) — tasked with treating millions of gallons of domestic, commercial, and industrial wastewater daily—**do not use PFAS** in their operations. However, they can receive PFAS from each of these waste streams. Current research is studying PFAS in biosolids including their ability to move into other media, like water, plants, and animals. Recent research found certain PFAS chemicals in biosolids, including the PFAS chemicals commonly found in toilet paper.[1]

The chemical properties of different PFAS affects their ability to build up in plants and animals. Some PFAS are more likely to stay in the organic rich soils, while others can more easily run-off in water or be taken up by plants.

Regulatory Context

The U.S. Environmental Protection Agency (EPA) has not set standards for PFAS in biosolids. Some states have developed plans to prevent and manage PFAS in biosolids. On January 14, 2025, the EPA released the draft risk assessment for two common PFAS, PFOS and PFOA, in biosolids. The draft risk assessment indicates that in some scenarios, the EPA's acceptable risk thresholds may be exceeded when sewage sludge containing PFOA and PFOS is land applied for beneficial reuse or surface disposed. The draft risk assessment focuses on farm families and their neighbors, who are likely to have much higher potential contact with biosolids than the general public.

The EPA, the United States Department of Agriculture (USDA)[2], and the United States Food and Drug Administration (FDA)[3] are working to understand the following:

- Potential risk of pollutants in land-applied biosolids
- Uptake rate of PFAS in agricultural produce grown on land supplemented with biosolids
- Concentrations of PFAS in the U.S. food supply

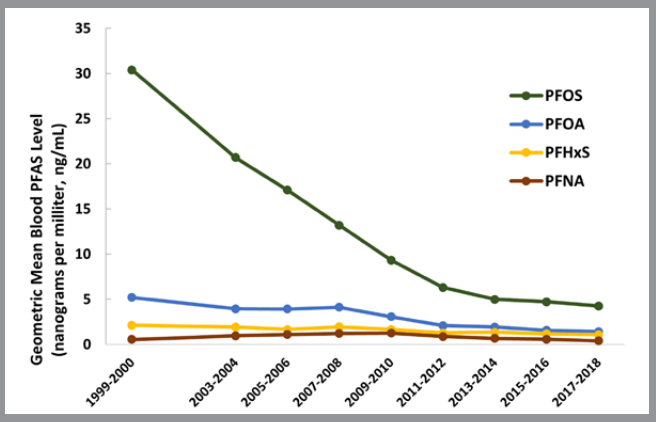
Sources other than biosolids can contribute to PFAS in agriculture, including insecticides, some synthetic fertilizers, and even rainfall.

The FDA has not found PFAS in over 97% of fresh and processed food samples since starting to test in 2019. Most of the samples where PFAS were detected were seafood (e.g., fish and shellfish). Similarly, only 2 (0.1%) of the 3,200 meat and poultry samples tested by the USDA's Food Safety and Inspection Service had detectable levels of PFAS.

PFAS Sources

You can commonly find PFAS in everyday consumer goods including **non-stick cookware**, **food paper packaging**, **cosmetics**, **fabrics and textiles**, and **cleaning products**. **Lithium-ion batteries**, **solar panels**, **fire-fighting foams**, and **medical devices** all use PFAS. PFAS by their very design are intended to be **durable** and **resistant to degradation** and treatment. Thus, PFAS are found in our bodies and our environment.

PFAS Exposure

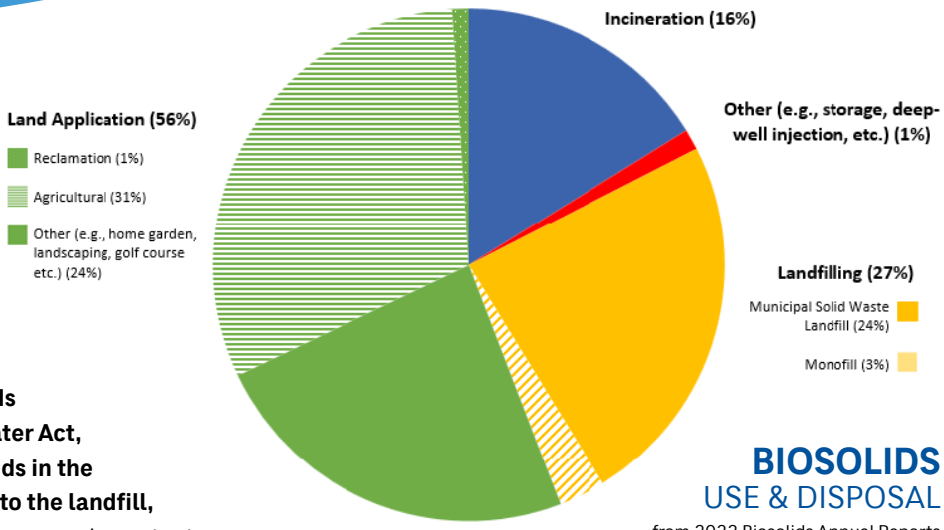


National Report on Human Exposure to Environmental Chemicals, Biomonitoring Data Tables for Environmental Chemicals. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention

PFAS are found in so many consumer and industrial products and applications that everyone has some risk of exposure. Exposure to specific PFAS compounds has been associated with certain health effects, including increases in cholesterol levels, changes in liver enzymes, lower antibody response to some vaccines, small decreases in birth weight, and kidney and testicular cancer.

Almost everyone in the U.S. and other developed countries have measurable amounts of PFAS in their blood. The National Health and Nutrition Examination Survey (NHANES)[4] has been monitoring certain PFAS chemicals in the blood of people living in the United States since 1999. As specific PFAS are phased out of use, which reduces everyday exposure, blood serum levels of those specific PFAS are dropping too.

It is challenging to compare potential risks from different materials or products based on PFAS concentrations alone. That is because each person's exposure to products varies. How often you may eat, touch, or breathe in PFAS associated with various products changes based on the product and how different people use it.



BIOSOLIDS
USE & DISPOSAL
from 2022 Biosolids Annual Reports

Benefits of Biosolid Land Application

Since 1993, land application of biosolids has been regulated under the Clean Water Act, Section 503. As of 2022, 56% of biosolids in the United States are land applied, 27% go to the landfill, and 16% go to an incinerator. Biosolids serve an important function in a sustainable and circular economy. Land applied biosolids offer moisture retention, slow-release nutrients, and carbon sequestration. Biosolids can also be used in other, non-agricultural applications, such as reclaiming lands after wildfires or mining. They also provide a cost-effective alternative to commercially manufactured synthetic fertilizers. Manufactured or synthetic fertilizers can often be prohibitively expensive and come with intensive energy footprints to manufacture. They often have negative water quality impacts because they release nutrients quickly.

Prohibiting land application can have unintended consequences. Those include increased greenhouse gas emissions to produce synthetic fertilizers and from moving biosolids long distances for disposal in a landfill. The cost of synthetic fertilizers to replace biosolids can also create economic hardship on farmers who rely on biosolids.

What's Next?

The EPA's draft risk assessment for PFOS and PFOA in biosolids is not a regulation, and the EPA, Environmental Council of the States (ECOS) and the National Association of State Departments of Agriculture (NASDA) emphasize that one of the most effective short and long term solutions[5] to reducing PFAS in biosolids is to prevent PFAS from entering wastewater treatment facilities in the first place.

The EPA acknowledges that POTWs may have limited options for biosolids management and changes may not be feasible, particularly in the short term. EPA identifies ongoing monitoring, pretreatment programs, and land-application strategies (e.g., distance from waterways, crop type, etc.) as considerations to mitigate potential risk.

A recent study found that up to 50-60% of certain PFAS could be absorbed through the skin from consumer products applied to the skin, like cosmetics.[6] This is an important and more common potential exposure pathway to PFAS than direct exposure to land applied biosolids for most people.

CDM Smith

NACWA
THE VOICE FOR A CLEAN WATER FUTURE

[1] https://www.acs.org/pressroom/presspacs/2023/march/toilet-paper-is-an-unexpected-source-of-pfas-in-wastewater.html
[2] https://www.farmers.gov/protection-recovery/pfas/faq
[3] https://www.fda.gov/food/process-contaminants-food/questions-and-answers-pfas-food
[4] https://www.atsdr.cdc.gov/pfas/data-research/facts-stats/index.html
[5] https://www.epa.gov/system/files/documents/2023-07/Joint-Principles-Preventing-Managing-PFAS.pdf
[6] Ragnarsdóttir, O., Abdallah, M.A.E. and Harrad, S., 2024. Dermal bioavailability of perfluoroalkyl substances using in vitro 3D human skin equivalent models. *Environment International*, 188, p.108772. https://www.sciencedirect.com/science/article/pii/S0160412024003581

ITEM NO. RA8 MOTION AUTHORIZING THE GENERAL MANAGER TO EXECUTE A PROFESSIONAL SERVICES AGREEMENT WITH H.T. HARVEY AND ASSOCIATES FOR A BIOSOLIDS SUITABILITY ASSESSMENT IN THE AMOUNT OF $40,275

Recommendation
Approve a motion authorizing the General Manager to execute an Agreement with H.T. Harvey and Associates.

Strategic Plan Linkage
5. **Resilience:** Champion resilience for communities and the environment through regional leadership and advancing priority programs to support the Member Agencies in achieving their sustainability goals.
    b. Advance concepts for shoreline adaptation and climate resilience.
6. **Internal Collaboration:** Expand cooperation among EBDA Member Agencies to improve economies of scale, reduce duplication of effort, and enhance each Agency's capacity.
    c. Advance a joint Biosolids Management Strategy.

Background
EBDA's member agencies currently use a combination of landfilling, land application as an agricultural soil amendment, and compost for disposal or beneficial reuse of their biosolids. Wastewater agencies across California have been under increasing pressure over the past several years to divert biosolids from landfill to reduce methane emissions as part of the state's Short-lived Climate Pollutant Reduction Strategy. More recently, land application and composting of biosolids have been under mounting public relations, regulatory, and legislative threats due to risks associated with PFAS, as discussed in Item No. RA7.

Meanwhile, there is recognition that around the Bay region, action is needed to improve shoreline resilience to sea level rise. Nature-based flood protection projects along the shoreline will require significant quantities of sediment to achieve desired elevations. The opportunity to reuse fill materials has the potential to bring down costs and accelerate wetland restoration and shoreline resilience. Projects such as the South Bay Salt Ponds Restoration Project and the South San Francisco Bay Shoreline Project require significant amounts of fill. Some of that fill is now being sourced from upland construction projects, and then amended with compost to improve its organic content.

Discussion
Staff is recommending that EBDA engage a team of H.T. Harvey and TRC Solutions, Inc. to evaluate the suitability of biosolids as an amendment to upland soils for use in wetland restoration and ecotone levee projects. The evaluation would review biosolids data through the lens of the Master Quality Assurance Project Plan (Master QAPP) for the U.S. Fish and Wildlife Service Don Edwards National Wildlife Refuge (Refuge). The Master

QAPP establishes methods to evaluate fill material from upland sources for beneficial reuse in the Refuge. If the evaluation indicates that biosolids may be suitable for use in shoreline restoration and resilience projects, the consulting team would facilitate discussions with the regulators that would have governance over such use – the San Francisco Regional Water Quality Control Board (RWQCB) and the Bay Conservation and Development Commission (BCDC).

The ability to use biosolids for restoration and shoreline resilience would be a win-win for EBDA agencies, providing a beneficial outlet for biosolids in the face of decreasing options, while providing a vital source of sediment and organic content for wetland ecosystems.

Staff is recommending a sole source contract for this work with H. T. Harvey and TRC Solutions, Inc. These two firms are uniquely qualified to provide this evaluation for the following reasons:

- The team authored the Master QAPP, which is the key document that will be used to evaluate biosolids for beneficial reuse. During preparation and implementation of the Master QAPP, the team collaborated closely with the RWQCB and BCDC to establish screening methods geared towards maximizing beneficial reuse opportunities without adversely affecting aquatic life.
- From 2018 to the present, H. T. Harvey has served and continues to work as a quality assurance officer, and TRC Solutions serves as a peer reviewer, to implement the Master QAPP.
- H. T. Harvey is contracted to the State Coastal Conservancy to lead the development of restoration plans for a large 60-acre ecotone for the South San Francisco Bay Shoreline Project. As a result, they have firsthand knowledge of the ecotone topsoil preparation requirements for ecotone restoration.
- During preparation of the team's most recent version of the Master QAPP document (completed in November 2024), H. T. Harvey in collaboration with TRC Solutions, RWQCB, and BCDC, developed a method to blend soil material that does not meet wetland reuse criteria with soil that does meet criteria. This method presents an opportunity to assess biosolid reuse potential, by blending biosolids that may not meet wetland surface criteria with other upland soil sources that do. Having developed this assessment method, the H. T. Harvey team is best qualified to use this method to assess biosolid reuse potential.

In EBDA's 2021-2022 Budget, the Commission approved setting aside $100,000 to evaluate the feasibility of an EBDA biosolids collaboration or project. That funding has been carried over in subsequent budgets and has not been used. The EBDA Managers Advisory Committee (MAC) recommended using a portion of those funds to support this evaluation.

East Bay Dischargers Authority – Preliminary Chemical Suitability Assessment of Biosolids for Beneficial Reuse in San Francisco Bay Marsh-Upland Ecotones

December 18, 2024
Proposal No. 11935

The H. T. Harvey & Associates (H. T. Harvey) team is pleased to submit a proposal to the East Bay Dischargers Authority (EBDA) to provide a preliminary assessment of the chemical suitability of Class B biosolids (hereafter, biosolids) produced from the wastewater treatment process for beneficial reuse in San Francisco Bay (Bay) shoreline restoration. We understand that EBDA has been a leader in contributing to multi-benefit projects along the shoreline, including the First Mile Horizontal Levee Project and the Oro Loma Sanitary District living levee demonstration project. We also understand EBDA evaluated the chemical suitability of agricultural lands where topsoil was mixed with biosolids to be restored to tidal wetlands (Bay Area Biosolids Coalition et al. 2022). H. T. Harvey team's proposed study will further EBDA's exploration of options for beneficial reuse of biosolids. Specifically, our team proposes to conduct a preliminary evaluation of the chemical suitability of biosolids mixed with upland soil for use in Bay shoreline tidal marsh-upland ecotone (ecotone) restoration (e.g., for construction of "horizontal levees").

The H. T. Harvey team consists of H. T. Harvey and TRC Solutions, Inc. Our firms have collaborated closely over the past 7 years to develop and implement the Master Quality Assurance Project Plan (Master QAPP) for the U. S. Fish and Wildlife Service Don Edwards National Wildlife Refuge (Refuge). The Master QAPP establishes methods to evaluate fill material from upland sources for beneficial reuse in the Refuge. The H. T. Harvey team coauthored the first version of the Master QAPP with the Refuge in 2017. Since then, the Master QAPP has been used as the basis to screen and import approximately 2,000,000 cubic yards of upland soil and urban stream sediment to the Refuge for levee fill and ecotone habitat creation (specifically, to the South San Francisco Bay Shoreline Project and the South Bay Salt Pond Restoration Project [SBSPRP]). H. T. Harvey serves as a quality assurance officer and TRC Solutions serves as a peer reviewer to implement the Master QAPP. During preparation and implementation of the Master QAPP, our team collaborates closely with the Regional Water Quality Control Board (RWQCB) and the Bay Conservation and Development Commission (BCDC) to establish screening methods geared towards maximizing beneficial reuse opportunities without adversely affecting aquatic life. As a result, our team has an unsurpassed understanding of the Master QAPP and how to collaborate with RWQCB and BCDC to evaluate novel potential beneficial fill materials, such as biosolids.

In our scope of work below, the H. T. Harvey team proposes to work with EBDA to prepare a plan to sample and analyze biosolids for this beneficial reuse evaluation. Sample analysis will be based on the list of contaminants of concern in the Master QAPP. Additional chemicals may be analyzed due to their potential

presence in biosolids and effect on ecological receptors. Based on our preliminary review of the white paper produced by Bay Area Biosolids Coalition et al. (2022), we assume that biosolids on their own may not meet the screening limits in the Master QAPP. However, mixing soil that has minor exceedances of QAPP standards with soil that meets these standards in a ratio to produce a mixture that meets the wetland surface criteria has been acceptable to BCDC, RWQCB, and the California Department of Toxic Substance Control (DTSC) in the past. The SBSPRP has primarily imported terrestrial subsoil with low organic content (less than 1% organic matter by dry weight). To facilitate vegetation establishment, H. T. Harvey typically recommends that topsoil in ecotones have an organic matter content of approximately 2-5% (dry weight basis). Mixing biosolids with lower fertility soil could potentially provide an opportunity to enhance the horticultural suitability of soil used for ecotones while remaining protective of aquatic life. Therefore, following receipt of biosolids sample results, we propose to explore the ratio of biosolids to upland fill soil that could potentially be mixed while remaining protective of aquatic life in wetlands. The outcome of this will be a preliminary evaluation of the ratio (by volume) of biosolids to upland soil, if any, that could potentially be mixed for reuse on upcoming permitted ecotone restoration projects in the Refuge. We will present our teams' findings as a concise technical memorandum, and after discussing the results with EBDA, set up a meeting with RWQCB and BCDC to review the results of the assessment and identify next steps.

Our proposed scope is presented below and our team's fee estimate is provided in Table 1 at the end of the scope of work.

Task 1. Biosolid Sample Plan and Data Review

The H. T. Harvey team will attend a kick-off meeting with EBDA. Then, the team will review the white paper by Bay Area Biosolids Coalition et al. (2022), preliminary chemical testing data on biosolids provided by EBDA, and carry out a limited literature review of ecological contaminants of concern in biosolids. In addition, the team will review basic information on biosolid production provided by EBDA, such as the quantity of biosolids being produced and the sources of the biosolids (e.g., sewer and stormwater run-off, or sewer only). Based on this review, the team will prepare a technical memorandum (3-5 pages) summarizing the findings and providing recommendations for EBDA to sample their biosolids to fill data gaps necessary for the H. T. Harvey team's evaluation. The sampling plan will include a list of relevant contaminant testing standards (for ecological screening), chemical contaminants, testing methods, and reporting limits that the laboratory will need to achieve so that results can be compared to applicable screening limits.

Deliverables:

- Technical memorandum with 1 figure showing EBDA biosolid production locations; with biosolid sample plan and rationale.

Assumptions:

- EBDA will provide relevant background information listed above.
- EBDA will collect and send samples to an appropriate laboratory for sample analysis and provide the results to H. T. Harvey as a lab report and electronic data deliverable (EDD).

Task 2. Analyze Sample Results and Prepare Memorandum Summarizing Potential for Beneficial Reuse

The H. T. Harvey team will compare the biosolids sample results to applicable screening limits for wetland surface criteria in the Master QAPP. The H. T. Harvey team will also review past borrow site submittals for a representative set of upland soil sources that have been approved as wetland surface material for the Shoreline project and/or SBSPRP, then determine the ratio of biosolid material that could have been mixed with up to 3 of these representative soil sources to generate a soil mixture that meets the wetland surface criteria in the Master QAPP. The results of the assessment will be summarized into a concise 4-6 page memorandum and submitted to EBDA for review. The H. T. Harvey team will meet with EBDA to discuss comments on the draft, then we will prepare a final version.

Deliverables:

- Draft and final technical memorandum summarizing potential for biosolid reuse in San Francisco Bay shoreline ecotone soils.

Assumptions:

- Laboratory testing results provided by EBDA will have sufficient accuracy to compare with applicable screening limits.

Task 3. Meet with RWQCB and BCDC to Discuss Results

Following completing of the memorandum in Task 2, if EBDA judges that they would like to proceed with evaluating the potential for beneficial reuse of biosolids, H. T. Harvey will coordinate and lead a virtual 1.5 hour meeting with EBDA and key staff involved in the Master QAPP from the RWQCB and BCDC. The purpose of the meeting will be to discuss the findings in the Task 2 memorandum, the H. T. Harvey team's opinion about the potential suitability of biosolids for beneficial reuse and get feedback from RWQCB and BCDC. Prior to meeting with RWQCB and BCDC, the H. T. Harvey team could meet with EBDA to discuss approaches to blending biosolids with potential import soil sources to achieve a final soil that meets the wetland surface criteria in the Master QAPP. Following the meeting, H. T. Harvey will prepare meeting notes and a list of ideas for next steps.

Deliverables:

- PowerPoint presentation for RWQCB/BCDC meeting
- Meeting notes

Fee Estimate

The H. T. Harvey team will bill time hourly up the maximum Team Not-to-Exceed Fee shown in the table below.

Task	H. T. Harvey	TRC Solutions	Team Not-to-Exceed Fee
Task 1. Biosolid Sample Plan and Data Review	$11,354	$6,000	$17,354
Task 2. Analyze Sample Results and Prepare Memorandum Summarizing Potential for Beneficial Reuse	$9,852	$2,500	$12,325
Task 3. Meet with RWQCB and BCDC	$8,069	$2,500	$10,569
Total	**$29,275**	**$11,000**	**$40,275**

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ITEM NO. 14 ITEMS FROM THE COMMISSION AND STAFF
The Commission and staff may comment on items of general interest.

ITEM NO. 15 ADJOURNMENT