



ITEM NO. 13

OPERATIONS & MAINTENANCE COMMITTEE AGENDA

Monday, April 14, 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. 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
April 14, 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, May 12, 2025**

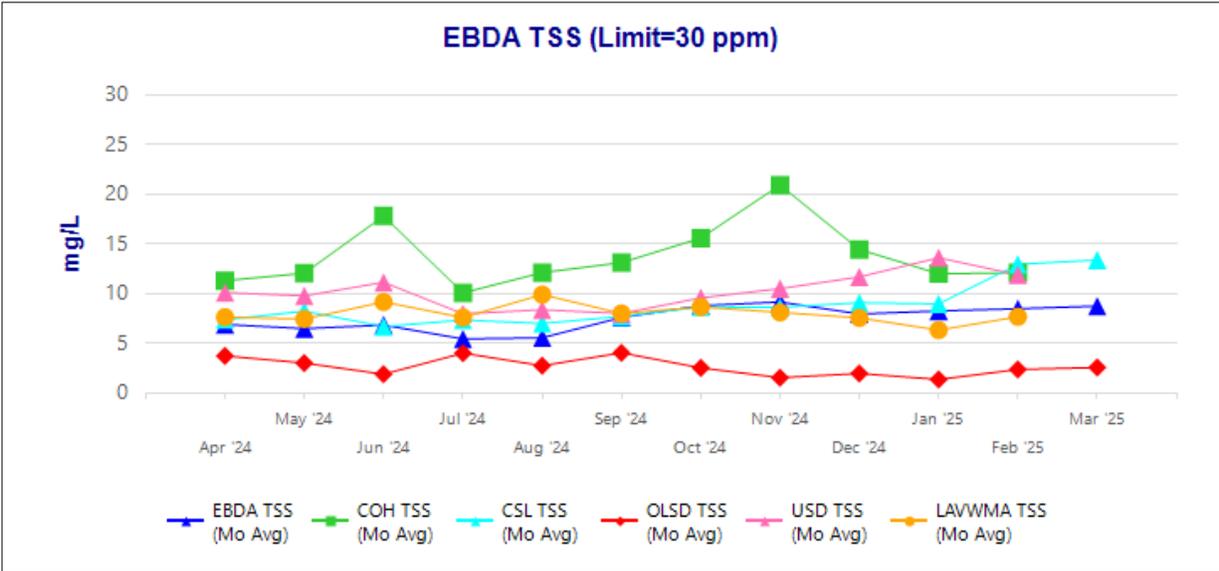
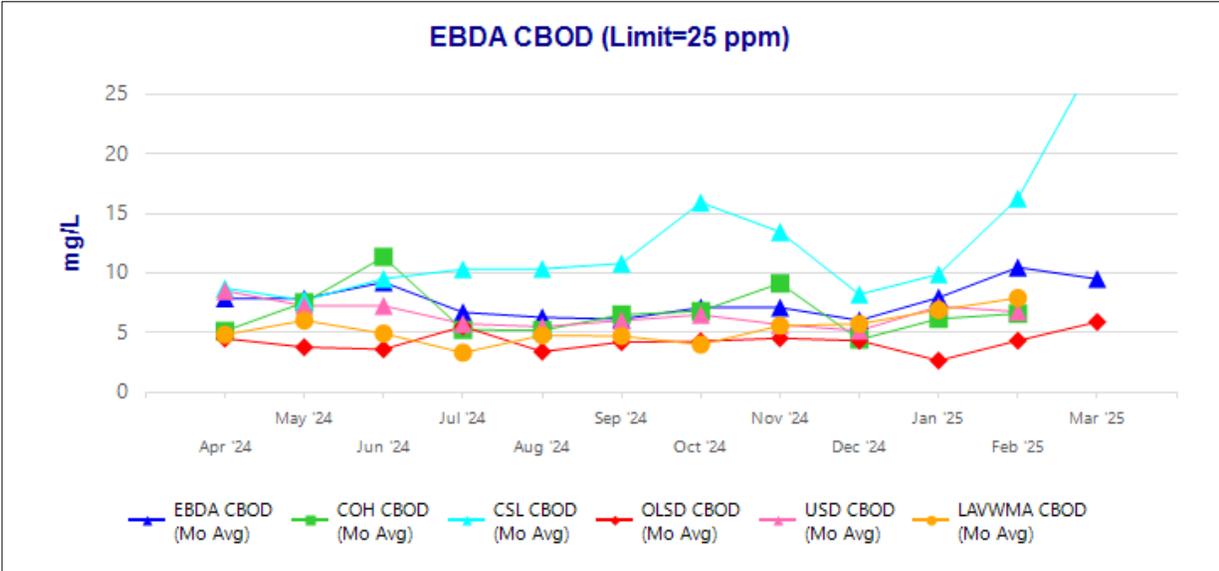
ITEM NO. OM4 EBDA PERMIT COMPLIANCE

Recommendation

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

Discussion

EBDA and its members continued our NPDES compliance in February, and preliminary March data indicates compliance as well, with one exception. San Leandro’s Water Pollution Control Plant experienced an upset in late March that led to exceedances of CBOD limits. San Leandro staff are working to determine the cause of the upset, including investigating whether an industrial discharge may be impacting the process. Member Agency CBOD and TSS performance are shown below. A table with bacterial indicators follows.



EBDA Bacterial Indicators

Date	FECAL	ENTERO
	MPN/ 100mL	MPN/ 100mL
Limit (90th Percentile)	1100	1100
Limit (Geomean)	500	280
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
December 2024 Geomean	22	5
January 2025 Geomean	25	5
2/3/2025	350	2
2/4/2025	17	22
2/5/2025	NA	10
2/10/2025	110	10
2/11/2025	17	22
2/12/2025	NA	17
2/17/2025	17	10
2/18/2025	49	8
2/24/2025	31	13
2/25/2025	49	6
February 2025 Geomean	44	10
3/3/2025	17	13
3/4/2025	17	15
3/5/2025	NA	2
3/10/2025	13	2
3/11/2025	31	10
3/17/2025	17	20
3/18/2025	23	47
3/24/2025	49	29
3/25/2025	11	57
3/31/2025	17	15
March 2025 Geomean	20	13

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

Vibration testing was completed on the two new HEPS pumps, and both new pumps tested well below the allowable vibration limits. Both pumps have been operating for almost three months without any major issues. As previously discussed, one of the new pumps makes an unusual intermittent noise, though it does not appear to impact operations. The pump manufacturer is so confident in the performance of their pumps that they have agreed to double the length of the warranty on all four pumps because of the noise from the one pump. The new extended warranty starts the date that each pump is placed in service. On April 11, Pump Repair Service is going to remove the next old pump, and on April 15, DW Nicholson is going to start work on the new concrete pump pad.

Oro Loma Effluent Pump Station (OLEPS)

Alameda County Department of Environmental Health Inspection

On March 18, 2025, the Alameda County Department of Environmental Health, Hazardous Materials Division, Certified Unified Program Agency (CUPA) conducted an inspection of EBDA & OLEPS. The inspection focused on the following four programs:

- Hazardous Materials Business Plan
- Hazardous Waste Generator – Small Quantity Generator
- Aboveground Petroleum Storage Act – Tier II
- Clean Water Program

The inspection included review of Oro Loma’s Spill Prevention Control and Countermeasure (SPCC) Plan, which includes OLEPS and EBDA’s Hazardous Materials Business Plan; Waste Manifests; Aboveground Storage Tank (AST) documentation; Training Records; and information reported to the California Environmental Reporting System (CERS). The inspection also included a site inspection of OLEPS.

There was one item identified during the inspection, and corrective documentation was returned to the Alameda County Department of Environmental Health within two days of receiving the inspection reports. The item was “failed to maintain documentation of arrangements with the local fire department and other emergency response agencies; or if none exist, failed to document that the attempt to make arrangements was made.”

Completing the Arrangements with Local Authorities Log is a new requirement. Below is a list the of the “Local Authorities” contacted by EBDA:

- Police Department - Alameda County Sheriff's Department
- Fire Department - Alameda County Fire Department
- Emergency Response Contractors - Safety-Kleen & Clean Harbors
- Equipment Suppliers - Sunbelt Rentals
- Hospitals - Eden Medical Center & Concentra Urgent Care
- Other Emergency Response Teams(s) - Oro Loma Sanitary District Operations & Maintenance Departments

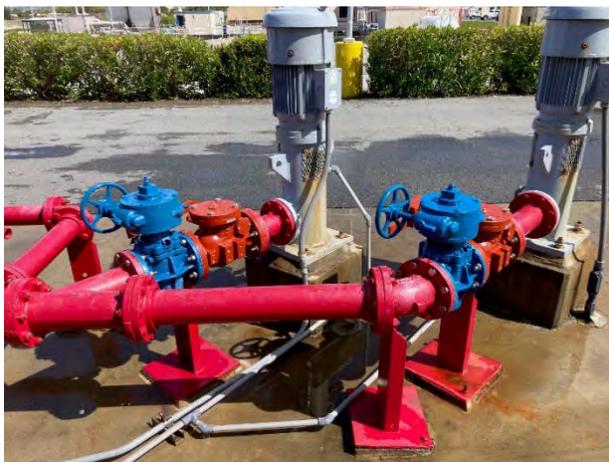
The inspection reports and a redacted version of the completed Arrangements with Local Authorities Log are attached.

OLEPS Water System

On March 17, DW Nicholson replaced two of the valves and two check valves on the discharge side of the water pumps at OLEPS. This water system provides cooling water for the OLEPS Effluent Pumps Right Angle Gear Drives. The work was completed for a total cost of \$11,837 for parts and labor. This replacement was paid for out of the Fund 31 RRF Small Projects Fund. During this replacement, the condition of the rest of the system was assessed, and it was determined that the remaining three valves and the strainer should be replaced. A project will be added to the FY 2025/2026 RRF Project List.



Old Valves & Check Valves



New Valves & Check Valves

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 (ATs) at OLEPS. Mr. Beecher will present his recommendations to the MAC at its next meeting. The two new ATs will improve the reliability of the pump station

in the event of a power outage. If PG&E power fails, the OLEPS emergency generator is the primary backup power source. 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 ATSS 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 March 2025, the Skywest Recycled Water System operated for two days and produced 1.11 million gallons of recycled water.

Marina Dechlorination Facility (MDF)

No change; all equipment is operational.

Force Main

Eden Landing Levee Breach

The California Department of Fish and Wildlife (CDFW), Bay Delta Region 3 manages the Eden Landing Ecological Reserve. CDFW first became aware of a levee breach near EBDA's 60-Inch force main in late January of 2025, which they believe occurred in December 2024 during large winter storms and King Tides. In mid-February, CDFW notified EBDA, and staff immediately engaged DCM Consulting, Inc. (DCM), EBDA's contract geotechnical engineer, to evaluate potential impacts of the breach on the pipeline. DCM determined that the levee breach itself is not an immediate threat to the force main, but the levee repair could be. DCM prepared a Technical Memorandum (TM) that was forwarded to CDFW (see attached). EBDA has requested that CDFW actively engage EBDA in planning and implementing the repair.

Operations Center

No change; all equipment is operational.

Miscellaneous Items

Underground Service Alerts

EBDA received eight (8) Underground Service Alert (USA) tickets during the month of February 2025. Two required an Electronic Positive Response (EPR), and of the two, one required a call and email to the excavator, and field verification.

Wet Weather

During the month of March 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 March 2025 (in inches) was as follows:

Oakland	Hayward	Livermore
1.07	1.72	1.93

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 made the decision to re-evaluate the pipeline route. Cargill is continuing to refine the route and is also investigating an alternative that would upgrade and repurpose a former Shell pipeline. Cargill’s preliminary schedule shows construction beginning sometime between 2027 and 2030 depending on permitting, with operation commencing between 2031 and 2033.

Cargill has requested that EBDA consider a 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, including an EIR Addendum that analyzes mitigation measures for species for which the endangered species listing status changed following EIR certification. Once negotiated, the Project Approval Agreement would be superseded by the final Operating Agreement. Additional information on the Project Approval Agreement and California Environmental Quality Act (CEQA) documentation can be found in Item No. FM7.

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. A 2-day workshop with agencies and program managers is scheduled for June 2025.

Sonoma Water, which has acted as program manager and grant administrator for the project since its inception, is in the process of reaching out to participating agencies regarding future funding needs. This includes funding for installation of a C-band radar to

complete the regional radar network, as well as long-term funding to the Center for Western Weather and Water Extremes (CW3E) at Scripps Institution of Oceanography, UC San Diego, for AQPI system operation, maintenance, and improvements. This local funding would begin in Fiscal Year 2026-2027, and would supplement state and federal funding that the team is also seeking. More information will be provided to the Commission as the specific request becomes clear.



ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)
 1131 HARBOR BAY PARKWAY
 ALAMEDA, CA 94502-6577
<https://deh.acgov.org/hazmat/>
 (510) 567-6702

INSPECTION REPORT - SUMMARY OF VIOLATIONS AND COMMENTS

Facility Name: EAST BAY DISCHARGERS AUTHORITY CERS ID: 10188879 Purpose: Routine Date: 03/18/2025
 Address: 2651 GRANT AVE SAN LORENZO CA 94580

Aboveground Petroleum Storage Act - Tier II

Additional Comments: On site at East Bay Dischargers Authority located at 2651 Grant Ave. San Lorenzo for the APSA Tier II inspection. There were no violations observed during this inspection.

Hazardous Waste Generator - Small Quantity Generator

6 - Maintained record of arrangements with emergency response agencies or attempt to make arrangements
Observation: Owner/Operator failed to maintain documentation of arrangements with the local fire department and other emergency response agencies; or if none exist, failed to document that the attempt to make the arrangements was made.
Class: MINOR VIOLATION
Code Section: 22 CCR 12 66262.16(b)(6)(F)2, 66262.17(a)(6), 66262.256(b)
Correct By: 04/17/2025
Corrective Action: Document arrangements that have been made with local fire department and other emergency response agencies, or, if attempts were made unsuccessfully, document that attempts to make arrangements were made.

Additional Comments: On site at East Bay Dischargers Authority located at 2651 Grant Ave. San Lorenzo for the HW Generator inspection.

As many have heard, the Generator Improvement Rule (GIR) went into effect on Monday, July 1, 2024. The rulemaking reorganized several sections of the California Code of Regulations (CCR) and made other updates to align with federal requirements. For additional information and resources, follow the links below.

- GIR information webpage – for general information.
- GIR rulemaking webpage – for information on the rule making.
- Regulatory crosswalk – for a comparison of the 'old' California Code of Regulations (CCR) citation with the 'new' CCR citation under the GIR.
- Frequently asked questions (FAQ) (Link can also be found on right-hand side in the Hazardous Waste Links of the GIR information webpage) – answers to questions you may have regarding GIR.
- Quick Reference Guide (QRG) and CERS | California Environmental Reporting System template and instructions (towards the top of the GIR information webpage, look for the 'template' link) - note that the QRG is a new requirement for individual large quantity generators to have succinct information available for emergency responders in the event they need to be called out to address an emergency. Emergency Response Contingency Plan does not satisfy QRG requirements. Submitting the QRG along with the contingency plan on CERS is acceptable. However, a copy of the QRG must also be kept at the LQG facility.

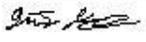
The numbering of some Federal Regulations has changed and California regulations may not yet reflect the renumbering, see Federal Register Vol. 81, No. 288 for a crosswalk of the previous citation to the new citations.

Hazardous Materials Business Plan

Additional Comments: On site at East Bay Discharger Authority located at 2651 Grant Ave. San Lorenzo for the HMBP inspection. There were no violations observed during this inspection.

This inspection report is a "NOTICE TO COMPLY". Please correct all violations immediately and submit proof of correction to ACDEH. ACDEH may re-inspect your facility to verify compliance.

Minor violations that are uncorrected 30 days after the date of inspection, and Class I and Class II violations are subject to formal enforcement action. Enforcement may include civil and/or criminal penalties under applicable local, state and/or federal laws or regulations. Formal enforcement action and/or penalty assessment may be initiated at any time without further notice and penalties may be calculated from the date of the violation.

Signature: 	
Inspector Name: Timothy Hildreth	Date: 03/18/2025

Owner/Facility representative who granted consent to inspect the facility		Owner/Facility representative who reviewed the inspection report	
Printed Name: Howard Cin	Signature: 	Printed Name: Howard Cin	Signature: 
Title/Position: Operations and Maintenance Manager	Date: 03/18/2025	Title/Position: Operations and Maintenance Manager	Date: 03/18/2025



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INSPECTION REPORT

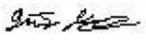
Hazardous Materials Business Plan

Facility Name: EAST BAY DISCHARGERS AUTHORITY **CERS ID:** 10188879 **Purpose:** Routine **Date:** 03/18/2025
Address: 2651 GRANT AVE SAN LORENZO CA 94580

NVO = No Violation Observed **Out** = Out of compliance **N/O** = Not Observed **N/A** = Not applicable

INSPECTION CATEGORY		COMPLIANCE				INSPECTION CATEGORY		COMPLIANCE				
ADMINISTRATION	Class	NVO	OUT	N/O	N/A	REMOTE, UNSTAFFED	Class	NVO	OUT	N/O	N/A	
1. Established/implemented a business plan when handling hazardous materials in reportable quantities		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	17. Remote unstaffed facility exemption requirements are met when not submitting a business plan		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Business plan electronically submitted initially, annually, or triennially		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AGRICULTURAL HANDLERS		Class	NVO	OUT	N/O	N/A
3. Business plan readily available to site personnel responsible for emergency response or training		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Agricultural handler exemption requirements are met when not submitting an emergency response plan		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Business plan reviewed and electronically certified as complete/accurate on or before the due date		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	19. Agricultural handler exemption requirements are met when not submitting a training program		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. Updated within 30 days of 100% increase or new haz; change of address/owner/name; or change in ops		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	20. Warning signs posted on buildings where pesticides, petroleum, or fertilizers are stored		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Actual or threatened release reported to the unified program agency and Cal OES		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	SALE/PROVISION RECORD		Class	NVO	OUT	N/O	N/A
7. Property owner notified in writing that business is in compliance with business plan requirements		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	21. Hazardous materials sale or provision records submitted to UPA within 5 days of request		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. Lessee provided copy of business plan to owner within 5 days after request		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TRANSFER DISCLOSURE		Class	NVO	OUT	N/O	N/A
OWNER/OPERATOR INFORMATION		Class	NVO	OUT	N/O	N/A	22. Notified UPA, when instructed to do so, of hazardous materials transfer		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Business Owner/Operator ID and Business Activities pages electronically submitted and are accurate		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GENERAL FACILITY REQUIREMENTS		Class	NVO	OUT	N/O	N/A
INVENTORY		Class	NVO	OUT	N/O	N/A	23. Administration/Documentation - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Complete and accurate Hazardous Materials Inventory information electronically submitted		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	24. Administration/Documentation - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CONSUMER PRODUCT/RETAIL ESTABLISHMENT		Class	NVO	OUT	N/O	N/A	25. Training - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Consumer product reported when stored at place of manufacture, warehouse, or where dispensed		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	26. Training - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Consumer product at retail establish. reported if exemption criteria not met or if required by UPA		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	27. Operations/Maintenance - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
SITE MAP		Class	NVO	OUT	N/O	N/A	28. Operations/Maintenance - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Site Map with all required content electronically submitted		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	29. Release/Leaks/Spills - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
EMERGENCY RESPONSE PLAN		Class	NVO	OUT	N/O	N/A	30. Release/Leaks/Spills - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Electronically submitted adequate response plan/procedures for release/threatened release of hazmat		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	TRAINING PROGRAM		Class	NVO	OUT	N/O	N/A
TRAINING PROGRAM		Class	NVO	OUT	N/O	N/A	31. Abandonment/Illegal Disposal/Unauthorized Treatment - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Established and electronically submitted adequate training program		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	32. Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16. Provided initial and annual training and maintained training records for a minimum of three years		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>							

- There were no violations observed during this inspection.
- See attached Summary for additional information.

Signature: 	
Inspector Name: Timothy Hildreth	Date: 03/18/2025

Owner/Facility representative who granted consent to inspect the facility		Owner/Facility representative who reviewed the inspection report	
Printed Name: Howard Cin	Signature: 	Printed Name: Howard Cin	Signature: 
Title/Position: Operations and Maintenance Manager	Date: 03/18/2025	Title/Position: Operations and Maintenance Manager	Date: 03/18/2025



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INSPECTION REPORT

Hazardous Waste Generator - Small Quantity Generator

Facility Name: EAST BAY DISCHARGERS AUTHORITY **CERS ID:** 10188879 **Purpose:** Routine **Date:** 03/18/2025
Address: 2651 GRANT AVE SAN LORENZO CA 94580

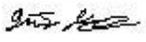
NVO = No Violation Observed **Out** = Out of compliance **N/O** = Not Observed **N/A** = Not applicable

INSPECTION CATEGORY		COMPLIANCE				INSPECTION CATEGORY		COMPLIANCE			
RECORDKEEPING/ DOCUMENTATION: ID NUMBER	Class	NVO	OUT	N/O	N/A	HAZARDOUS WASTE MANAGEMENT: DISPOSAL	Class	NVO	OUT	N/O	N/A
1. Obtained ID# and maintained ID# through completion of annual eVQ.		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	30. Disposed of hazardous waste at an authorized location		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. RCRA SQG maintained ID# by notifying DTSC by Sept 1 each year renotifications are required		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	31. Quarantined HW not removed/ transferred/disposed without permission by authorized agent or a court		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
RECORDKEEPING/ DOCUMENTATION: CONTINGENCY PLAN	Class	NVO	OUT	N/O	N/A	HAZARDOUS WASTE MANAGEMENT: ACCUMULATION TIME LIMITS	Class	NVO	OUT	N/O	N/A
6. Maintained record of arrangements with emergency response agencies or attempt to make arrangements	MINOR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	32. VSQG disposed of waste within 180 days of accumulation start date (90 days for AHW)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
RECORDKEEPING/ DOCUMENTATION: TRAINING	Class	NVO	OUT	N/O	N/A	33. SQG disposed of hazardous waste within 180 days of accumulation start date (90 days for AHW)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Employees thoroughly familiar with all waste handling and emergency procedures		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	35. Met all requirements for hazardous waste satellite accumulation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
RECORDKEEPING/ DOCUMENTATION: MANIFEST	Class	NVO	OUT	N/O	N/A	HAZARDOUS WASTE MANAGEMENT: CONTAINER MANAGEMENT	Class	NVO	OUT	N/O	N/A
11. Prepared a Uniform Hazardous Waste Manifest for transportation of hazardous waste		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	36. Labeled all containers or portable tanks containing hazardous waste		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Properly completed all Uniform Hazardous Waste Manifests		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	37. Accumulated hazardous waste in containers that are in good condition		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Completed all Uniform Hazardous Waste Manifest exception reporting requirements		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	38. Hazardous waste accumulated in lined and/or compatible containers		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Signed copy of Uniform Hazardous Waste Manifest kept for 3 years		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	39. Containers of hazardous waste closed except when adding or removing waste		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Sent a legible copy of each Uniform Hazardous Waste Manifest to the DTSC within 30 days of shipment		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	40. Inspects all hazardous waste storage areas at least weekly		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. All consolidated manifest requirements are met		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	41. Incompatible waste in containers managed properly to prevent a reaction		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18. Exempt used oil management operating log records are retained for 3 years		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	49. Empty containers > 5 gallons properly managed		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Owner/Operator retained copy of manifest or bill of lading for spent lead acid batteries for 3 years		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	HAZARDOUS WASTE MANAGEMENT: TANK MANAGEMENT	Class	NVO	OUT	N/O	N/A
RECORDKEEPING/ DOCUMENTATION: WASTE DETERMINATION	Class	NVO	OUT	N/O	N/A	50. Stationary tanks marked with "Hazardous Waste", hazards of waste, and the accumulation start date		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20. Determined if waste generated is hazardous waste		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	51. Continuously fed hazardous waste tanks are equipped with an overflow protection device		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21. Kept records of any test results, waste analyses, or other determinations		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	52. Daily inspections of the hazardous waste tank systems conducted		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
22. Determined land disposal restrictions for hazardous waste		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	53. Weekly inspections of the hazardous waste tank system conducted		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
RECORDKEEPING/ DOCUMENTATION: REPORTING	Class	NVO	OUT	N/O	N/A	54. Removed hazardous waste from tanks, equipment, and discharge confinement structures upon closure		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23. Program data reported electronically, and accurately, when required		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	55. Uncovered hazardous waste tanks have 2 feet of freeboard unless equipped with adequate containment		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24. Submitted Recyclable Materials Report every two years		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>						
25. Remote Waste Consolidation Site Annual Notification submitted		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>						
HAZARDOUS WASTE MANAGEMENT: DISPOSAL	Class	NVO	OUT	N/O	N/A						

29. Registered hazardous waste transporter used to transport hazardous waste		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	HAZARDOUS WASTE MANAGEMENT: RECYCLABLE MATERIALS	Class	NVO	OUT	N/O	N/A
					67. Recyclable material is managed properly		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

INSPECTION CATEGORY		COMPLIANCE				INSPECTION CATEGORY		COMPLIANCE			
HAZARDOUS WASTE MANAGEMENT: USED OIL	Class	NVO	OUT	N/O	N/A	UNIVERSAL WASTE: ELECTRONIC DEVICES/CRT/PV MODULES	Class	NVO	OUT	N/O	N/A
68. Generator does not intentionally contaminate used oil with other hazardous wastes		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	94. Accepts 100kg or generates 5000 kg/yr of E-waste/CRTs/PV modules & reports to DTSC Feb 1 annually		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAZARDOUS WASTE MANAGEMENT: USED OIL AND FUEL FILTERS	Class	NVO	OUT	N/O	N/A						
69. Properly manages used oil filters and fuel filters		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	UNIVERSAL WASTE: EXPORTING NOTIFICATION	Class	NVO	OUT	N/O	N/A
HAZARDOUS WASTE MANAGEMENT: LEAD ACID BATTERIES	Class	NVO	OUT	N/O	N/A						
70. Meets requirements for handling/storing/transporting lead acid batteries		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	95. UWH sending devices/CRTs/CRT glass to any foreign destination completed and submitted notification		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
71. Meets all requirements when accepting spent lead-acid batteries		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		UNIVERSAL WASTE: UW MANAGEMENT	Class	NVO	OUT	N/O
72. Properly manages, stores and labels all damaged lead-acid batteries		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	96. UWH labeled all universal waste		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAZARDOUS WASTE MANAGEMENT: CERTIFIED APPLIANCE RECYCLERS	Class	NVO	OUT	N/O	N/A	97. UWH accumulated universal waste for no longer than 1 year		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
73. Obtained Certified Appliance Recycler certification (CAR) from the DTSC		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	98. UWH meets all accumulation standards for universal waste aerosol cans		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
74. CAR properly managed all MSRSH as hazardous waste		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		99. Universal waste aerosol cans managed to prevent fire, explosion and unauthorized release		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
75. CAR maintains documentation regarding removal and management of MRSH from appliances		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	100. Notified UPA of aerosol can processing procedures prior to starting this process		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAZARDOUS WASTE MANAGEMENT: REUSABLE SOILED TEXTILES	Class	NVO	OUT	N/O	N/A	101. UWH properly prepares, handles and retains shipping papers for all universal waste shipped		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
76. Properly managed reusable soiled textile materials prior to being sent for laundering		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		102. UWH transfers or disposes all universal waste to an appropriate destination facility		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HAZARDOUS WASTE MANAGEMENT: LABORATORY WASTE	Class	NVO	OUT	N/O	N/A	103. UWH properly cleaned up and contained spills of universal waste		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
77. Laboratory waste managed in accordance with HSC 25200.3.1(b)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		UNIVERSAL WASTE: TRAINING	Class	NVO	OUT	N/O
78. Laboratory waste treated in accordance with HSC 25200.3.1(c)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	104. UWH complied with all universal waste training requirements		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAZARDOUS WASTE MANAGEMENT: UNAUTHORIZED TREATMENT	Class	NVO	OUT	N/O	N/A		GENERAL FACILITY REQUIREMENTS	Class	NVO	OUT	N/O
79. Obtained a HW facilities permit or grant of authorization prior to treating hazardous waste		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	105. Administration/Documentation - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GENERAL FACILITY OPERATIONS: SITE SAFETY	Class	NVO	OUT	N/O	N/A	106. Administration/Documentation - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
80. Posted valid emergency information next to the telephone		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	107. Training - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
81. Emergency coordinator on the premises or on call		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	108. Training - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
82. Facility equipped with all required emergency equipment		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	109. Operations/Maintenance - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
83. Tests and maintains all required safety equipment at the facility		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	110. Operations/Maintenance - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
84. Maintains adequate aisle space		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	111. Release/Leaks/Spills - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
85. Maintains and operates the facility to minimize the possibility of fire/explosion/release		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		112. Release/Leaks/Spills - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
UNIVERSAL WASTE: >5000 KG	Class	NVO	OUT	N/O	N/A	113. Abandonment/Illegal Disposal/Unauthorized Treatment - General		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
91. UWH notified the EPA and obtained a federal ID number prior to storing 5,000 kg or more of RCRA UW		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		114. Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
92. UWH obtained an ID# from DTSC prior to storing >5,000 kg of UW when a fed ID# is not required		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>						
UNIVERSAL WASTE: ELECTRONIC DEVICES/CRT/PV MODULES	Class	NVO	OUT	N/O	N/A						
93. UWH of PV modules/e-devices/CRTs/CRT glass that doesn't treat waste submitted required info to DTSC		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>						

- There were no violations observed during this inspection.
- See attached Summary for additional information.

Signature: 	
Inspector Name: Timothy Hildreth	Date: 03/18/2025

Owner/Facility representative who granted consent to inspect the facility		Owner/Facility representative who reviewed the inspection report	
Printed Name: Howard Cin	Signature: 	Printed Name: Howard Cin	Signature: 
Title/Position: Operations and Maintenance Manager	Date: 03/18/2025	Title/Position: Operations and Maintenance Manager	Date: 03/18/2025



ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)
 1131 HARBOR BAY PARKWAY
 ALAMEDA, CA 94502-6577
<https://deh.acgov.org/hazmat/>
 (510) 567-6702

INSPECTION REPORT

Aboveground Petroleum Storage Act - Tier II

Facility Name: EAST BAY DISCHARGERS AUTHORITY **CERS ID:** 10188879 **Purpose:** Routine **Date:** 03/18/2025
Address: 2651 GRANT AVE SAN LORENZO CA 94580

NVO = No Violation Observed **Out = Out of compliance** **N/O = Not Observed** **N/A = Not applicable**

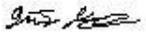
INSPECTION CATEGORY		COMPLIANCE				INSPECTION CATEGORY		COMPLIANCE				
REQUIREMENT TO PREPARE AND IMPLEMENT	Class	NVO	OUT	N/O	N/A	GENERAL SPCC REQUIREMENTS: DISCHARGE REPORTING/RESPONSE/ DISPOSAL/PREDICTION	Class	NVO	OUT	N/O	N/A	
1. SPCC has been prepared		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	24. SPCC Plan addressed countermeasures for discharge discovery, response and cleanup		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. SPCC plan has been prepared that meets all applicable requirements		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	25. SPCC Plan addresses disposal methods for recovered materials		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. SPCC has been implemented		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	26. SPCC contains procedures for reporting a discharge		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. SPCC onsite If facility staffed 4 hrs/day, or at the nearest field office if not so attended		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	27. SPCC organized so discharge procedures are readily usable if the facility has no response plan		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Qualified Facility's SPCC plan has been self or PE certified.		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	28. SPCC predicts direction, rate of flow, total quantity of oil that could be released from a discharge		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Facility prepared appropriate SPCC when no longer meeting Tier I/II requirements		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GENERAL SPCC REQUIREMENTS: CONTAINMENT		Class	NVO	OUT	N/O	N/A
SPCC AMENDMENTS		Class	NVO	OUT	N/O	N/A	30. SPCC addresses the appropriate general containment/diversionary structures/equipment		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Facility has amended SPCC as necessary		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	31. Appropriate (general) containment/diversionary structures/equipment have been provided		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. SPCC has been implemented within 6 months of amendment		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GENERAL SPCC REQUIREMENTS: IMPRACTICABILITY		Class	NVO	OUT	N/O	N/A
13. Tech amendments certified when a change in facility design/operations occurs, & by PE when required		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	32. Impracticability of containment/diversionary items, if claimed, is PE demonstrated and certified		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
FIVE YEAR REVIEW		Class	NVO	OUT	N/O	N/A	33. Periodic integrity/leak testing performed with impracticability claim		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. 5 year review performed on SPCC and documented		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	34. If claiming impracticability of containment/diversionary items a contingency plan has been included		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
GENERAL SPCC REQUIREMENTS		Class	NVO	OUT	N/O	N/A	35. If claiming impracticability written commitment of manpower, equipment, and materials provided		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. SPCC in writing, follows code seq/cross ref, good eng practice, mgt approval, items not in place		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GENERAL SPCC REQUIREMENTS: TRAINING		Class	NVO	OUT	N/O	N/A
16. SPCC Plan discusses conformance with all SPCC rule requirements, & state rules/regsguidelines.		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	36. Employee training and spill prevention briefings discussed in SPCC plan		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GENERAL SPCC REQUIREMENTS: ENVIRONMENTAL EQUIVALENCE		Class	NVO	OUT	N/O	N/A	37. Training provided for op/maint of equip, discharge procedures, laws/regsg, general fac ops, and SPCC		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Environmental Equivalence, if claimed, is addressed in SPCC, other than for secondary containment.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	38. Person has been designated as accountable for discharge prevention and reports to management		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GENERAL SPCC REQUIREMENTS: TIER II ALTERNATIVE MEASURES		Class	NVO	OUT	N/O	N/A	39. Spill prevention briefings are conducted annually		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. PE certified enviro equivalence, impracticability, and produced water containers/piping, if needed		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	GENERAL SPCC REQUIREMENTS: SECURITY		Class	NVO	OUT	N/O	N/A
19. PE required attestations in the SPCC Plan for alternative measure claim at a Tier II facility		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	40. SPCC addresses security measures-lighting, access to handling/storage, valves/pumps/transfer equip		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
GENERAL SPCC REQUIREMENTS: FACILITY DESCRIPTION/STORAGE/DIAGRAM		Class	NVO	OUT	N/O	N/A	41. Handling areas, valves, pumps/starter controls, load/unload connections secured, lighting adequate		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Physical layout of the facility is adequately and accurately described in SPCC		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	GENERAL SPCC REQUIREMENTS: LOADING/UNLOADING RACKS		Class	NVO	OUT	N/O	N/A
21. SPCC Plan addresses the type of oil and storage capacity for all fixed and portable containers		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	42. SPCC adequately discusses facility tank car and tank truck loading/unloading rack		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
22. SPCC contains an adequate facility diagram		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	43. Loading rack containment has capacity to contain single largest compartment of tank car/truck		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
GENERAL SPCC REQUIREMENTS: DISCHARGE REPORTING/RESPONSE/ DISPOSAL/PREDICTION		Class	NVO	OUT	N/O	N/A						
23. SPCC adequately addresses discharge prevention measures for routine handling, loading/unloading		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>							

INSPECTION CATEGORY		COMPLIANCE				INSPECTION CATEGORY		COMPLIANCE					
GENERAL SPCC REQUIREMENTS: LOADING/UNLOADING RACKS		Class	NVO	OUT	N/O	N/A	SPCC REQUIREMENTS FOR ONSHORE FACILITIES: EFFLUENT TREATMENT		Class	NVO	OUT	N/O	N/A
44. Vehicular departure warning system in place at facility with a loading/unloading rack			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	73. Discharge from effluent treatment facilities which discharge to navigable waterways observed			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GENERAL SPCC REQUIREMENTS: BRITTLE FRACTURE		Class	NVO	OUT	N/O	N/A	SPCC REQUIREMENTS FOR ONSHORE FACILITIES: RESPONSE TO RELEASE		Class	NVO	OUT	N/O	N/A
46. Brittle fracture evaluation of field-constructed aboveground tanks performed			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	74. Visible discharges promptly corrected and any accumulation of oil in diked areas promptly removed.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GENERAL SPCC REQUIREMENTS: OIL-FILLED OPERATION EQUIPMENT		Class	NVO	OUT	N/O	N/A	SPCC REQUIREMENTS FOR ONSHORE FACILITIES: MOBILE/PORTABLE CONTAINER		Class	NVO	OUT	N/O	N/A
47. Oil filled operational equipment containment standards are met			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	75. Adequate secondary containment provided for mobile/portable storage containers			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: DRAINAGE		Class	NVO	OUT	N/O	N/A	SPCC REQUIREMENTS FOR ONSHORE FACILITIES: PIPING		Class	NVO	OUT	N/O	N/A
48. Facility drainage or drainage controls adequately discussed			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	76. SPCC Plan discusses aboveground piping, buried piping, piping inspections, and vehicle warnings.			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
49. Facility drainage adequately restrained unless conditions met			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	77. Buried piping is inspected for deterioration if exposed and repaired if corrosion damage is found			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
50. Valves used for drainage are manual (not flapper-type) to prevent a discharge			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	78. Buried piping is corrosion protected with protective wrapping, coating, or cathodic protection			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
51. Drainage from undiked areas or diversion systems designed to retain final discharge in facility			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	79. Terminal connection capped/blank flanged at transfer point & origin marked if not in service/standby			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
52. Lift pumps provided for treated drainage waters when more than one treatment unit			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	80. Pipe supports designed to minimize abrasion and corrosion, and allow for expansion and contraction			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: BULK STORAGE CONTAINER-SPCC PLAN/COMPATIBILITY		Class	NVO	OUT	N/O	N/A	81. Aboveground valves, piping, and appurtenances are regularly inspected			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
53. Adequate discussion of all bulk storage containers located at the facility			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	82. Integrity/leak tested buried piping when installed, modified, constructed, relocated, or replaced			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
54. Material and construction of all containers are compatible with the material stored			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	83. Vehicle traffic warned of aboveground piping or other oil transfer operations			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: SECONDARY CONTAINMENT		Class	NVO	OUT	N/O	N/A	EXCLUDED TIUGA REQUIREMENTS		Class	NVO	OUT	N/O	N/A
55. Adequately sized secondary containment provided and maintained for bulk storage containers			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	84. Excluded TIUGA <55 gal has secondary containment, inspected monthly and log of inspections kept			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
57. Secondary containment and leak detection provided for TIUGA piping if not viewable on all sides			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	OIL FILLED ELECTRICAL EQUIPMENT		Class	NVO	OUT	N/O	N/A
58. Containment systems are sufficiently impervious to contain oil			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	85. Oil filled electrical equipment exclusions have been met, and where not met is included in SPCC plan			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: DRAINAGE INSPECTIONS/RECORDS		Class	NVO	OUT	N/O	N/A	GENERAL FACILITY REQUIREMENTS		Class	NVO	OUT	N/O	N/A
59. Rainwater in diked areas is inspected before draining			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	87. Tank Facility Statement or Business Plan has been submitted			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
60. Records maintained of drainage from diked areas			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	88. Spills/releases of 42 gallons or more of petroleum reported upon discovery to Cal OES & UPA or 911			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: CATHODIC PROTECTION		Class	NVO	OUT	N/O	N/A	89. APSA program fee paid			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
61. Buried section of partially buried or bunkered metallic tank has corrosion protection			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	90. All/any permanently closed tanks are properly closed under the definition in 40 CFR 112.2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: INSPECTIONS & TESTING		Class	NVO	OUT	N/O	N/A	91. Substantial Harm Criteria certification maintained at the facility as required			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
62. SPCC discusses procedures to test/inspect storage containers for integrity per industry standards			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	92. Administration/Documentation - General			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
63. Tanks inspected and tested by qualified person in accordance with industry standards			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	93. Administration/Documentation - General Local Ordinance			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
64. Aboveground containers tested or inspected for integrity based on industry standards			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	94. Training - General			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
65. TIUGAs meet requirements for direct viewing or inspections/ leak detection			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	95. Training - General Local Ordinance			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
66. Written Inspection/testing procedures kept, inspection/testing records signed, kept for 3 years			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	96. Operations/Maintenance - General			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: STEAM RETURN/EXHAUST		Class	NVO	OUT	N/O	N/A							
67. Steam return/exhaust lines that discharge to watercourse are monitored or have treatment system			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
SPCC REQUIREMENTS FOR ONSHORE FACILITIES: OVERFILL PREVENTION		Class	NVO	OUT	N/O	N/A							
68. SPCC adequately describes overfill prevention methods, and devices/systems used for each container			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>							

71. Each container installation has a liquid level sensing device.		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	97. Operations/Maintenance - General Local Ordinance		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
72. Liquid level sensing devices regularly tested to ensure proper operation		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	98. Release/Leaks/Spills - General		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

INSPECTION CATEGORY		COMPLIANCE				INSPECTION CATEGORY		COMPLIANCE			
GENERAL FACILITY REQUIREMENTS	Class	NVO	OUT	N/O	N/A	GENERAL FACILITY REQUIREMENTS	Class	NVO	OUT	N/O	N/A
99. Release/Leaks/Spills - General Local Ordinance		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	101. Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
100. Abandonment/Illegal Disposal/Unauthorized Treatment - General		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>						

- There were no violations observed during this inspection.
 See attached Summary for additional information.

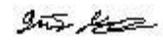
Signature: 	
Inspector Name: Timothy Hildreth	Date: 03/18/2025

Owner/Facility representative who granted consent to inspect the facility		Owner/Facility representative who reviewed the inspection report	
Printed Name: Howard Cin	Signature: 	Printed Name: Howard Cin	Signature: 
Title/Position: Operations and Maintenance Manager	Date: 03/18/2025	Title/Position: Operations and Maintenance Manager	Date: 03/18/2025



Reason for Inspection: <input type="checkbox"/> First Inspection <input checked="" type="checkbox"/> Routine Inspection <input type="checkbox"/> Response to Complaint <input type="checkbox"/> Follow-Up					Follow-up Inspection Due:
NAME OF FACILITY EAST BAY DISCHARGERS AUTHORITY			SITE ADDRESS 2651 GRANT AVE SAN LORENZO CA 94580		
CONTACT NAME Howard Cin		PHONE (510) 278-5910	BUSINESS TYPE/ACTIVITY Water Treatment Plant		SIC 9511 (see OSHA) <input type="checkbox"/> High priority facility
Is the property owner different than the facility owner? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no If yes, complete the following:					
NAME			PHONE		
MAILING ADDRESS ,					
Is the facility covered under any other programs or permits? (check all that apply) <input type="checkbox"/> None <input type="checkbox"/> Sanitary Sewer					
<input type="checkbox"/> Air quality		<input checked="" type="checkbox"/> Hazmat business plan		<input type="checkbox"/> Underground storage tanks	
<input type="checkbox"/> Fire department (hazmat storage)		<input checked="" type="checkbox"/> Hazmat waste generator		<input type="checkbox"/> Aboveground storage tanks	
		<input type="checkbox"/> Retail Food Facility		<input type="checkbox"/> Other _____	
Is the facility covered under a stormwater permit? <input checked="" type="checkbox"/> Does not need coverage <input type="checkbox"/> No, but may need to be (Refer to Regional Board)					
<input type="checkbox"/> Individual		<input type="checkbox"/> General: Does the facility have a SWPPP? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no			
N/A = Not Applicable; PTNL = POTENTIAL for Pollutant Discharge: 1 = low potential, 2 = medium potential, 3 = high potential					
BMP = Best Management Practice: 0 = BMPs are effective, 1 = BMPs are fairly/almost effective, 2 = BMPs are not effective, 3 = No BMPs are implemented					
NSW = Non-Stormwater Discharge					
AREAS OF ACTIVITY	N/A	Potential	Effectiveness	Actual Discharge	REMARKS: Describe recommendations, requirements, and time to implement. Check box if remark is a requirement
		PTNL	BMP	NSW	
A. Outdoor Process/Manufacturing Areas	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/> None Note:
B. Outdoor Material Storage Areas	<input type="checkbox"/>	1	0	<input type="checkbox"/>	<input type="checkbox"/> None Note: ConVault Diesel Tank with Triple Containment.
C. Outdoor Waste Storage/Disposal Areas	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/> None Note:
D. Outdoor Vehicle and Heavy Equipment Storage, Maintenance Areas	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/> None Note:
E. Outdoor Parking Areas and Access Roads	<input type="checkbox"/>	1	0	<input type="checkbox"/>	<input type="checkbox"/> None Note: All parking areas drain to three drains outside which goes back through the water treatment plan then to the well for discharge to the Bay.
F. Outdoor Wash Areas	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/> None Note:
G. Rooftop Equipment	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/> None Note:
H. Outdoor Drainage from Indoor Areas	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/> None Note:
I. Other (describe)	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/> None Note:
COMMENTS/REMARKS/REQUIREMENTS Structural Control present <input type="checkbox"/> Maintenance required in storm drain system <input type="checkbox"/> yes <input checked="" type="checkbox"/> no					
Routine site inspection performed to evaluate the potential for site/business operations to impact quality of on-site stormwater discharges. The Regional Water Quality Control Board requires that all cities within Alameda County perform regular stormwater inspections at industrial/commercial businesses.					
DOCUMENT ANY EXPOSURE TO ON-SITE STORM DRAINS: No storm drain. Water drains to POTW.					
Number of BMP brochures distributed? 0 Describe:					
PRIORITY FOR RE-INSPECTION: <input type="checkbox"/> 1; First <input type="checkbox"/> 2; Second <input checked="" type="checkbox"/> 3; Third					<input type="checkbox"/> Referred to:
ENFORCEMENT: <input checked="" type="checkbox"/> None <input type="checkbox"/> Verbal Notice <input type="checkbox"/> Administrative Action <input type="checkbox"/> Administrative Action w/ Penalty &/or Cost <input type="checkbox"/> Legal Action <input type="checkbox"/> Warning Notice <input type="checkbox"/> Recovery					

Facility Representative: 
Howard Cin, Operations and Maintenance Manager

Inspector: 
Timothy Hildreth, Hazardous Materials Specialist

Arrangements with Local Authorities Log

Business Name: East Bay Dischargers Authority
Business Address: 2651 Grant Avenue, San Lorenzo, CA 94580
CERS ID (if applicable): 10188879

In compliance with 22 CCR 66262.16(b)(6)(F)2; 66262.256, Generators must maintain records documenting arrangements with six local authorities, tabulated below. These records may include this form and/or other supporting documentation that either confirm such arrangements actively exist or, in cases where no arrangements exist, confirm that attempts to make such arrangements were made. Please ensure this form and/or any other records are readily available on-site at the facility for review and validation. Uploading this form to CERS is not required.

**Please note, submission of the Hazardous Materials Business Plan (HMBP) in the California Environmental Reporting System (CERS) does not satisfy the requirement for making, or attempting to make, arrangements with the six local authorities.*

Local Authority	Name of Authority	Date of Communication	Type of Communication	Describe Arrangements Made, If Any
<i>Example</i>	<i>Oakland Police Department</i>	<i>7/1/2024</i>	<i>verbal, email, mailed letter</i>	<i>none, 24hr spill response, etc.</i>
Police Department	Alameda County Sheriff's Department	4/2/2025	Call 510-667-7721	None
Fire Department	Alameda County Fire Department	4/2/2025	Call 925-422-7594 [REDACTED]	None
Emergency Response Contractors	Safety-Kleen & Clean Harbors	4/2/2025	Call 408-294-8778 888-375-5336	24 Hour Spill Response
Equipment Suppliers	Sunbelt Rentals	4/2/2025	Call 510-394-6206	24 Hour Equipment Rental
Hospitals	Eden Medical Center & Concentra Urgent Care	4/2/2025	Call 510-537-1234 510-343-8300	None
Other Emergency Response Teams(s)	Oro Loma Sanitary District Operations & Maintenance	4/2/2025	Call Joe Carlini [REDACTED] Joe McCauley [REDACTED]	24 Hour Spill Response

To: Howard Cin
East Bay Dischargers Authority

From: Dave Mathy
DCM Consulting, Inc.

Subject: Eden Landing Ecological Reserve
North Creek Marsh Levee Breach
and EBDA 60-inch Transport Pipeline
Hayward, California

Date: March 28, 2025

File: No. 437

1.0 INTRODUCTION

This technical memorandum presents the results of a geotechnical engineering evaluation of site conditions at a levee breach within Eden Landing Ecological Reserve in Hayward, California (see Figure 1 for site location). The State of California Department of Fish and Wildlife (CDFW), Bay Delta Region 3 manages the Eden Landing Ecological Reserve. CDFW first became aware of the levee breach in late January of 2025 (see Figure A-1 for levee breach location as provided by CDFW). CDFW believes that the levee breach occurred in December 2024 during large winter storms and King Tides. East Bay Dischargers Authority’s (EBDA) Transport Pipeline, 60-inch RCP Force Main, crosses the Eden Landing Ecological Reserve and is in close proximity to the levee breach (see Figure 2).



Figure 1 – Location of levee breach in Eden Landing Ecological Reserve south of SR 92 and Arden Road in Hayward, California.

See Figure 2 for close-up view of the levee breach location and EBDA’s Transport Pipeline alignment.

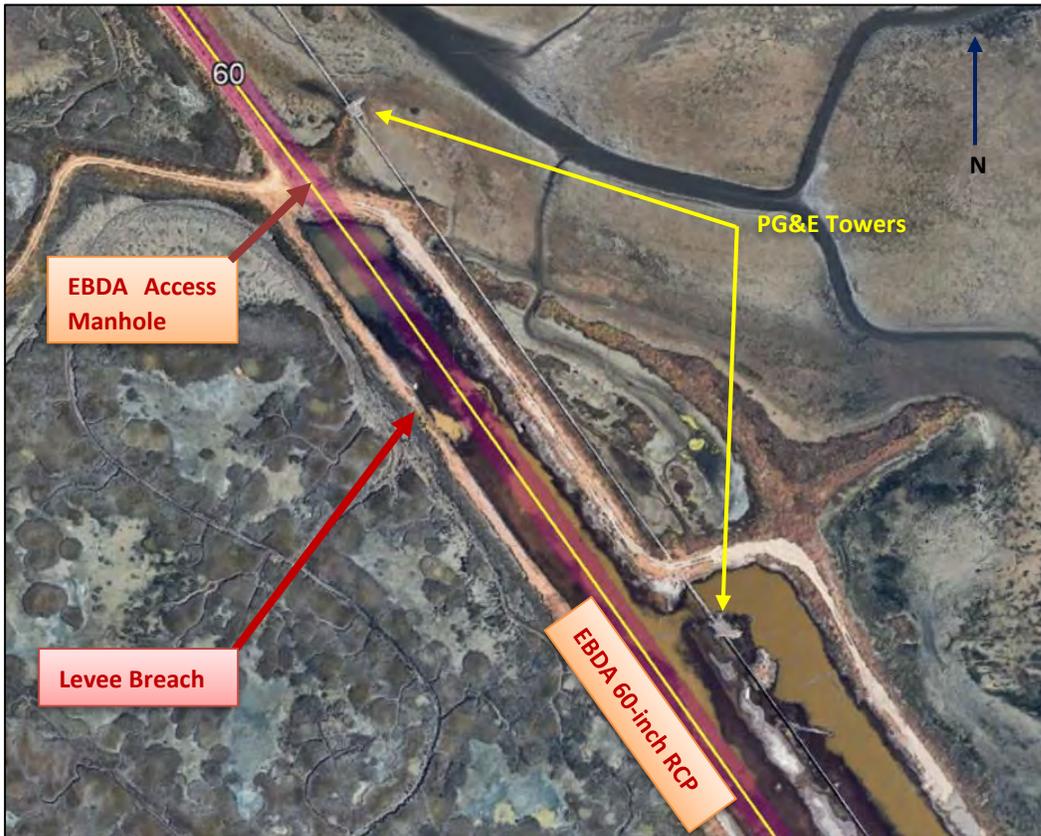


Figure 2 – Excerpt from EBDA Transport Pipeline, 60-inch RCP, Force Main alignment mapping on Google Earth imagery.

At this location the EBDA Transport Pipeline is a 60-inch inside diameter reinforced concrete pipe (RCP) Force Main.

PG&E towers (yellow arrows) are noted for reference.

Note existing levees parallel to and on each side of the EBDA Transport Pipeline alignment.

The EBDA Access Manhole shown is at EBDA Transport Pipeline Station 150+10 (see Figure A-2 for EBDA Transport Pipeline Plan and Profile). The levee breach is approximately 300 feet south of the Access Manhole at EBDA Station 150+10.

As shown in Figure 2 the EBDA Transport Pipeline is not located beneath the subject levee and levee breach. The EBDA Transport Pipeline alignment is parallel to the levee and approximately 40 feet northeast of the levee breach. The following site photographs have been provided by CDFW and EBDA.



Photo 1 – View of levee breach, looking south.

Dashed red line is the approximate EBDA Transport Pipeline alignment, approx. 40 feet northeast of the levee breach.

Photo provided by CDFW (Ref. 2). Per CDFW the levee breach is about 30 feet across by 30 feet wide by 10 feet high (Ref. 3).

Annotation by DCM.



Photo 2 – Close up view of levee breach looking south at the south side remaining levee.

Dashed red line is the approximate EBDA Transport Pipeline alignment.

Photo provided by CDFW. Per CDFW the breached levee is approximately 10 feet high (Ref. 3).

Annotation by DCM.



Photo 3 – View of levee and EBDA Transport Pipeline alignment looking south.

Dashed red line is the approximate EBDA Transport Pipeline alignment, about 40 feet northeast of levee breach. Note existing levees on both sides of the Transport Pipeline alignment.

EBDA Access Manhole at Station 150+10 at photo bottom center.

The levee breach is approximately 300 feet south of the Access Manhole at EBDA Station 150+10.

Photo provided by EBDA.

Annotation by DCM.

EBDA Access Manhole Station 150+10



Photo No. 4 – View of levee breach looking southwest. Note washed out levee soil on the east (inland) side of the levee.

Dashed red line is the approximate EBDA Transport Pipeline alignment about 40 feet northeast of levee breach.

Photo provided by EBDA.

Annotation by DCM.

EBDA has requested that DCM Consulting, Inc. (DCM) review the current site conditions and levee breach and provide conclusions and recommendations for protection of EBDA's 60-inch RCP Transport Pipeline.

2.0 REFERENCES

The following references have been used by DCM for this project geotechnical review.

1. East Bay Dischargers Authority
Force Main Between Hayward and Alvarado
Drawing Nos. 1 through 57
By: Kennedy Engineers
Dated: August 8, 1977
2. East Bay Dischargers Authority
Transport Pipeline Force Main Alignment Mapping
on Google Earth Imagery
By: EBDA
undated
3. Email and Levee Breach Photographs
From: Garrett Allen (CDFW)
To: Jackie Zipkin (EBDA)
Dated: February 11, 2025
4. Emails with Site and Levee Breach Photographs
From: Howard Cin (EBDA)
To: DCM
Dated: March 3, 2025
5. USGS Open-File Report 2006-1037
Quaternary Deposits, Central San Francisco Bay
Witter, Knudson, et al, 2006

3.0 GEOTECHNICAL CONDITIONS

The levee breach and EBDA Transport Pipeline are located within mapped Bay Mud deposits (see Figure A-3). The upper Bay Mud, referred to as Young Bay Mud is a very recent still water sediment deposited around San Francisco Bay since the last Ice Age (i.e., over the last 10,000 years). The thickness of Young Bay Mud varies from 0 feet around the margins of the Bay to about 100 feet along the east shore of the Peninsula. Young Bay Mud is composed of dark grey silty clay, with thin layers of silt and fine sand and varying amounts of organics and shell fragments. Young Bay Mud is in a normally consolidated state with exceptionally low shear strength and exceptionally high compressibility. Typical Young Bay Mud physical and engineering characteristics are:

- Unified Soil Classification System (USCS) Soil Classification: Fat Clay (CH) and Elastic Silt (MH)
- Dry unit weights: very low at 40 to 65 pcf
- Moisture content: very high approaching 100%
- Plasticity: very high with typical Plasticity Index (PI) of 35 to 50
- Shear Strength: very low with typical undrained shear strengths (S_u) of 200 to 400 psf
- Compressibility: very high with typical Compression Index (C_c) of 1.2 to 1.8
- Permeability: very low with typical (k) of 1×10^{-6} cm/sec to 1×10^{-9} cm/sec

Given these physical and engineering properties, construction on and within Young Bay Mud is exceptionally challenging, especially earthwork construction such as rebuilding the breached levee. With its very low shear strength and bearing capacity specialized earthwork equipment (e.g., low ground pressure) is required to avoid sinking into and becoming mired in the Bay Mud. With its high clay content and high moisture content, drying out saturated Young Bay Mud for compaction as engineered levee fill is especially difficult and time consuming. With its low shear strength and low permeability rapid filling on Young Bay Mud can produce mud waves when the Young Bay Mud does not have sufficient time to consolidate under load (e.g., the new fill sinks into the Young Bay Mud pushing a mud wave out from the base of fill).

4.0 CONCLUSIONS

1. As shown in Figure 2 and Photos 1 through 4 the EBDA Transport Pipeline is not located beneath the subject levee and levee breach. The EBDA Transport Pipeline alignment is parallel to the levee and approximately 40 feet northeast of the levee breach.
2. The levee breach is the result of an erosion failure with high surface waters (e.g., King Tides) and storm waves acting on the Bay side of the levee and overtopping the levee (see washed out levee soil deposition on the inland side of the levee in Photo 4).
3. There is no imminent danger to the EBDA Transport Pipeline from the levee breach. The EBDA Transport Pipeline at this location has always been under groundwater (and seasonal surface waters) within the wetlands area and is not adversely impacted by additional surface waters from the levee breach or tidal action on those waters.
4. Opposite the levee breach location, the depth of cover on the EBDA Transport Pipeline is about 4 to 5 feet (see Figure A-2).
5. The soils directly underlying the levee and EBDA Transport Pipeline are most likely Young Bay Mud (see Figure A-3) with very low shear strength and very low permeability. These low strength soils are very sensitive to loading and earthwork construction, specifically fill placement and rate of loading. Rapid loading (i.e., rapid levee filling to about 10 feet high) can overstress the Young Bay Mud resulting in

shear failure, fill sinking and creation of a mud wave of displaced Young Bay Mud reaching several tens of feet laterally.

Generation of a mud wave during levee reconstruction can impose lateral loading on the EBDA Transport Pipeline causing opening of segmented 60-inch RCP pipe joints.

6. Heavy earthwork construction equipment crossing over the EBDA Transport Pipeline within Young Bay Mud with only 4 to 5 feet of cover (i.e., within the existing wetlands) can punch through the Young Bay Mud causing mud waves or point loading on the 60-inch RCP pipeline.
7. The existing levee system within Eden Landing Ecological Reserve may not be wide enough or strong enough for heavy earthwork construction equipment and import fill transfer trucks to access the levee breach (see Photos 1 and 2). If the levee breach is accessed from the north there is approximately 2,300 feet of existing levee to traverse that closely parallels the EBDA 60-inch Transport Pipeline (see Figures A-4 and A-5). Given the close parallel proximity of this levee to the EBDA Transport Pipeline, levee stability during construction access is critical. Failure of this levee could adversely impact the EBDA Transport Pipeline by levee and Young Bay Mud displacement or mud wave generation.

Also, the EBDA 60-inch Transport Pipeline will be crossed at existing levees such as at the San Francisco Bay Trail levee (see Figures A-5 and A-6). Planned EBDA Transport Pipeline crossings at existing levees need to be evaluated on a case-by-case basis as a function of levee condition, specific construction equipment to be used and depth of cover on the EBDA Transport Pipeline.

8. The very real concern for protection of the EBDA Transport Pipeline is construction activity by CDFW in accessing and reconstructing the levee breach. The following recommendations contain constraints on construction means and methods and recommendations intended to protect the EBDA Transport Pipeline during CDFW's levee reconstruction earthwork activities.

5.0 RECOMMENDATIONS

1. EBDA should be given the opportunity to review the CDFW work plan for reconstructing the levee breach including:
 - a. geotechnical investigation and geotechnical engineering recommendations for levee reconstruction;
 - b. earthwork construction equipment access route(s) crossing the Transport Pipeline;
 - c. earthwork construction equipment (make, model and weight) and import fill transfer trucks (make, model and weight) to be used;
 - d. proposed earthwork levee reconstruction plan including subgrade preparation, rate of filling limitations and compaction standards and methods; and
 - e. geotechnical instrumentation plan (e.g., access route levee stability monitoring, breached levee stability monitoring during filling and settlement monitoring plan, etc.).

2. Existing levees, and specifically the continuation of the levee north and south of the levee breach (see Figure 2 and Photos 1 and 2) and the parallel levee directly northeast of the EBDA Transport Pipeline alignment (see Figure 2 and Photo 3) may not be wide enough or strong enough to support earthwork construction equipment. CDFW will need to evaluate existing levee stability with respect to earthwork equipment traffic loading to ensure that the levees can safely support the planned construction equipment.

Levee failure during construction equipment access (e.g., on the existing levee north and south of the levee breach and on the existing levee directly northeast of the EBDA Transport Pipeline alignment) will likely generate a mud wave that could adversely impact EBDA's Transport Pipeline.

3. Existing levees within Eden Landing Ecological Reserve to be used for construction equipment access, for example from the north public parking area at the end of Eden Landing Road (see Figure A-4) and specifically approximately 2,300 feet of existing levee from San Francisco Bay Trail to the EBDA Access Manhole at Station 150+10 that closely parallels the EBDA Transport Pipeline (see Figure A-5) need to be carefully evaluated by CDFW for levee stability with respect to planned construction equipment traffic loading.

Levee failure during construction equipment access (e.g., on the 2,300-foot stretch of existing levee from the San Francisco Bay Trail to EBDA Access Manhole at Station 150+10) would likely generate levee and Young Bay Mud displacement and a mud wave that could adversely impact the EBDA Transport Pipeline.

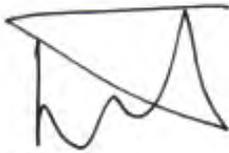
4. The EBDA Transport Pipeline alignment parallel to the levee failure and between EBDA Access Manholes at Station 150+10 and Station 173+67 (approximately 2,300 feet) should be field marked with signage on all levee access routes crossing the Transport Pipeline, within wetlands, square to the levee breach, and at no more than 250-foot spacings within wetlands. Signage to advise Contractors of the presence of EBDA's 60-inch RCP Transport Pipeline Force Main, directing Contractors to protect the EBDA Transport Pipeline during construction and to only cross the EBDA Transport Pipeline at designated locations.

If the construction access route is from the north parking area at the end of Eden Landing Road, similar signage should be placed along the 2,300-foot stretch of levee closely paralleling the EBDA Transport Pipeline (see Figure A-5).

5. Where earthwork construction equipment must pass over the EBDA Transport Pipeline, designated crossing locations at existing levees should be determined (crossings should not be allowed in wetlands areas). Designated crossing locations should include crane mats or steel plates or other suitable bridging materials placed to spread out live wheel or track loading and minimize the risk of equipment loads causing levee failure or equipment sinking into the levee and Young Bay Mud. The maximum depth of any fills placed on existing levees at designated EBDA Transport Pipeline crossing locations should be limited to one (1) foot.
6. Staging of construction materials (e.g., import fill) or construction equipment should not be allowed anywhere within EBDA's 40-foot-wide right-of-way.

7. All EBDA Transport Pipeline designated crossing locations should be monitored for settlements and displacements. All crossings must be maintained with a smooth surface (i.e., no bumps causing impact loading on the underlying Transport Pipeline).
8. During reconstructing the approximate 10-foot-high levee, the fill surface should be continuously monitored and surveyed for signs of rapid settlement and potential mud wave generation. The CDFW work plan should include contingency measures for the protection of the EBDA 60-inch RCP Transport Pipeline if excessive fill settlement and mud wave generation occur.

Let me know if you have any questions about these conclusions and recommendations.



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



Attachments: Figures A-1 through A-6

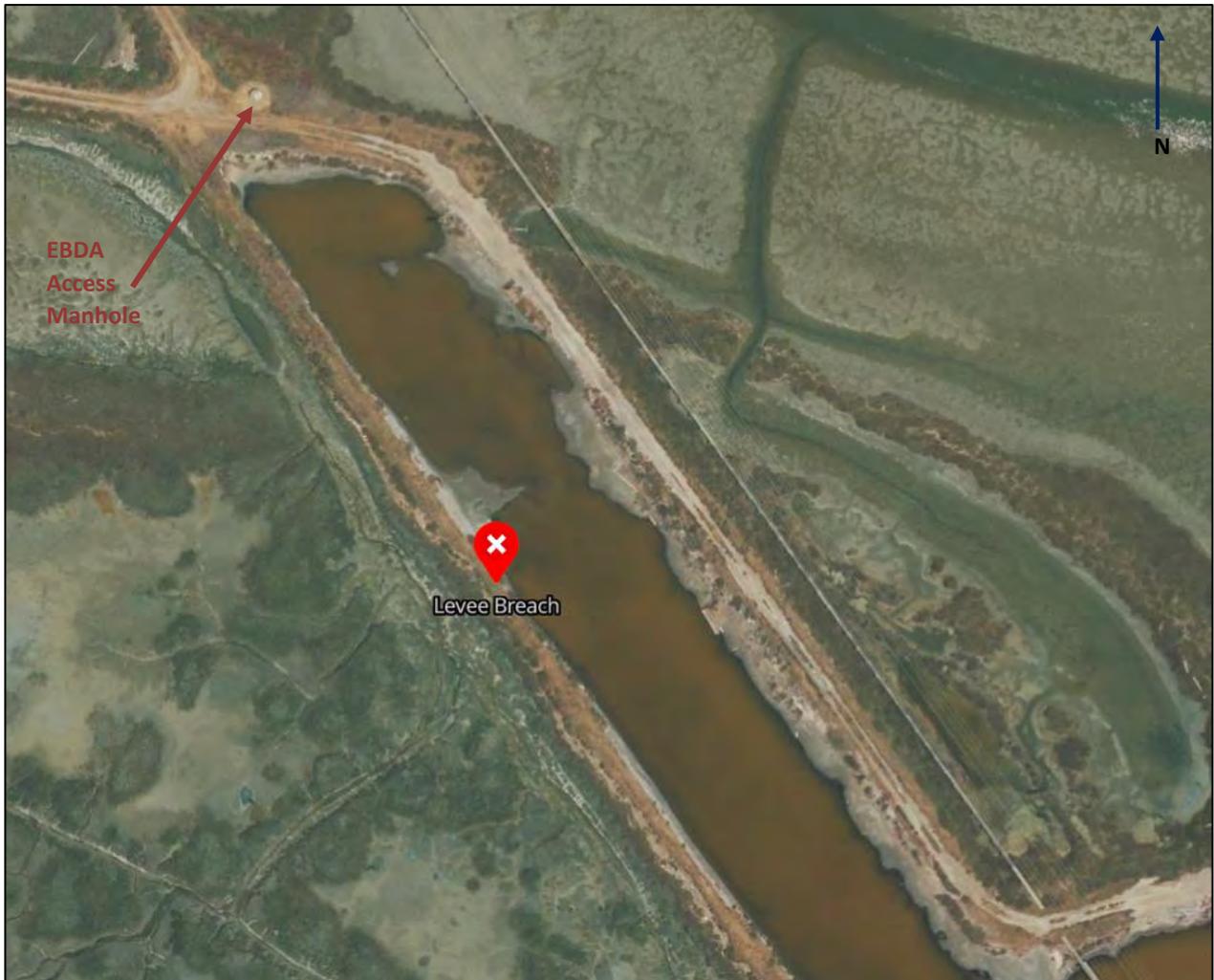
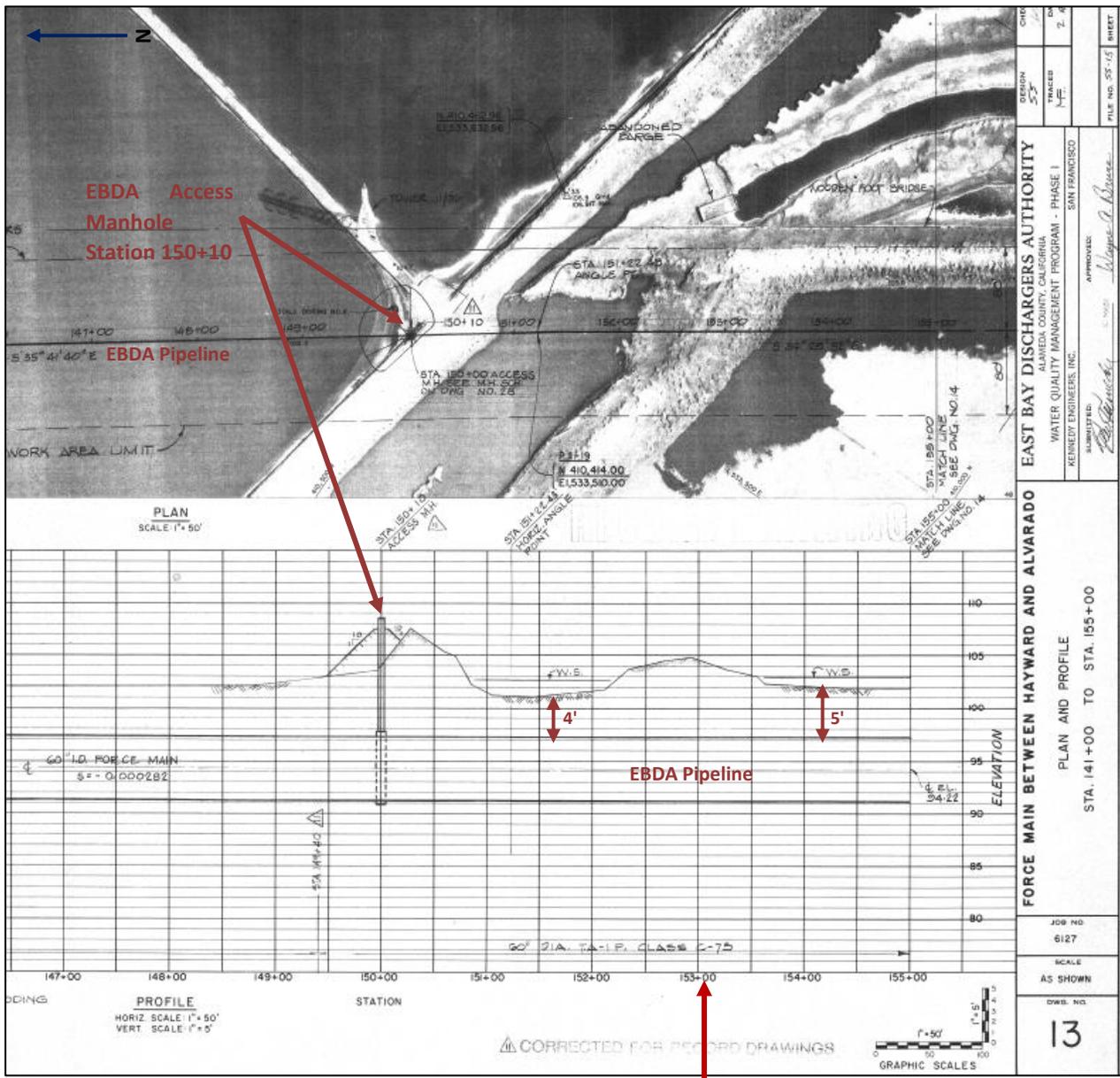


Figure A-1 – Location of levee breach as provided by CDFW in 2/11/25 email to EBDA (Ref. 3).

The EBDA Access Manhole noted is at EBDA Station 150+10 (see Figure A-2). The levee breach is approximately 300 feet south of the EBDA Access Manhole.



Levee breach at EBDA
 Station ~153+10

Figure A-2 – Excerpt from 1977 EBDA Transport Pipeline Force Main Plan and Profile
 The Access Manhole shown in Figure 2 is at Station 150+10. North to left.

Levee Breach is approx. 300 feet south of Access Manhole, at approx. EBDA Station 153+10.

Note that the berm shown around Station 152+00 to 154+00 in the 1977 drawings is no longer present. The depth of cover on the EBDA 60-inch RCP Transport Pipeline Force Main at Station 153 +10 is approximately 4 to 5 feet.

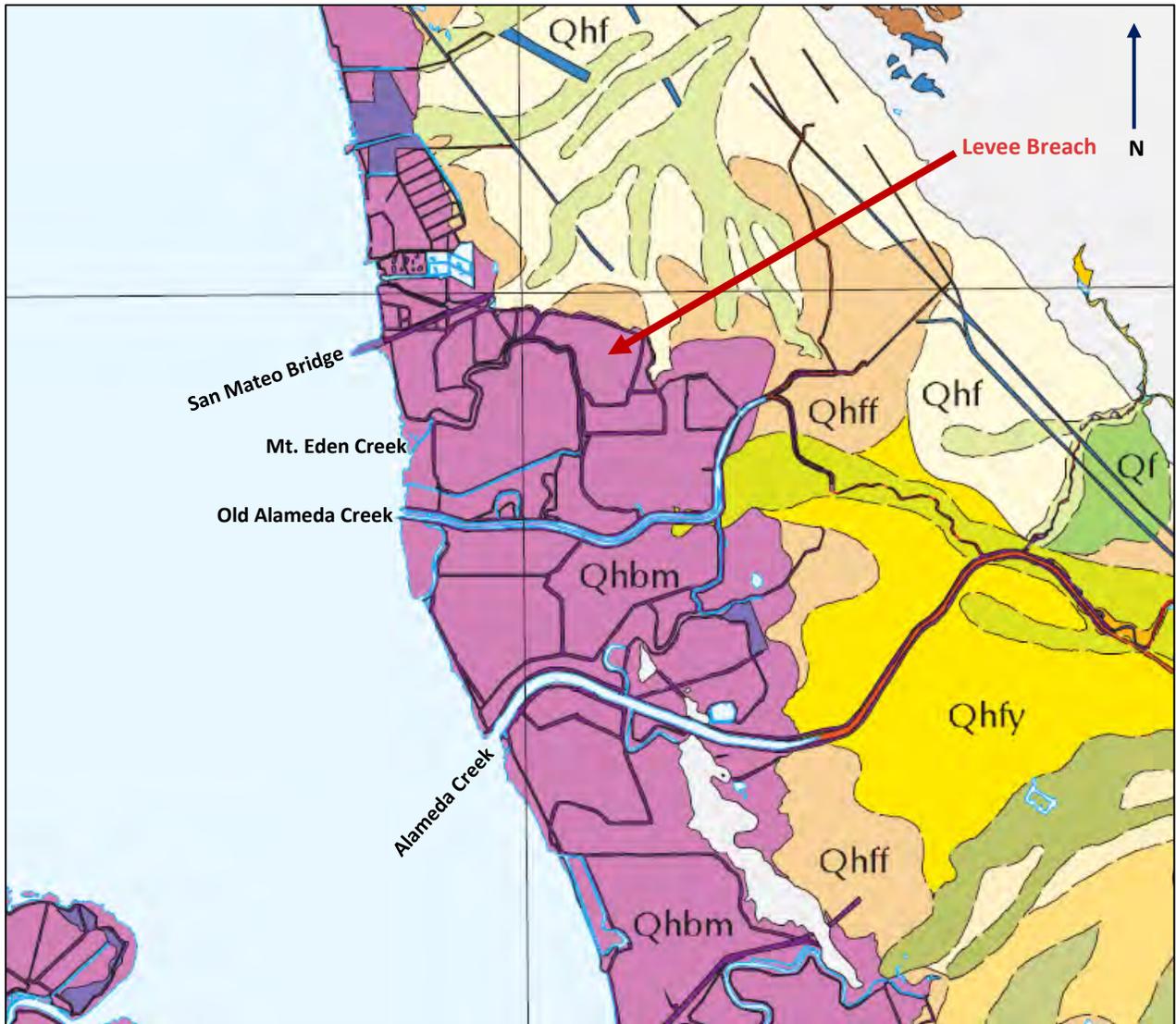


Figure A-3 – USGS Open-File Report 2006-1037
Quaternary Deposits, Central San Francisco Bay
Witter, Knudson, et al, 2006

Qhbm = San Francisco Bay Mud

The area of the levee breach is within mapped Bay Mud deposits.

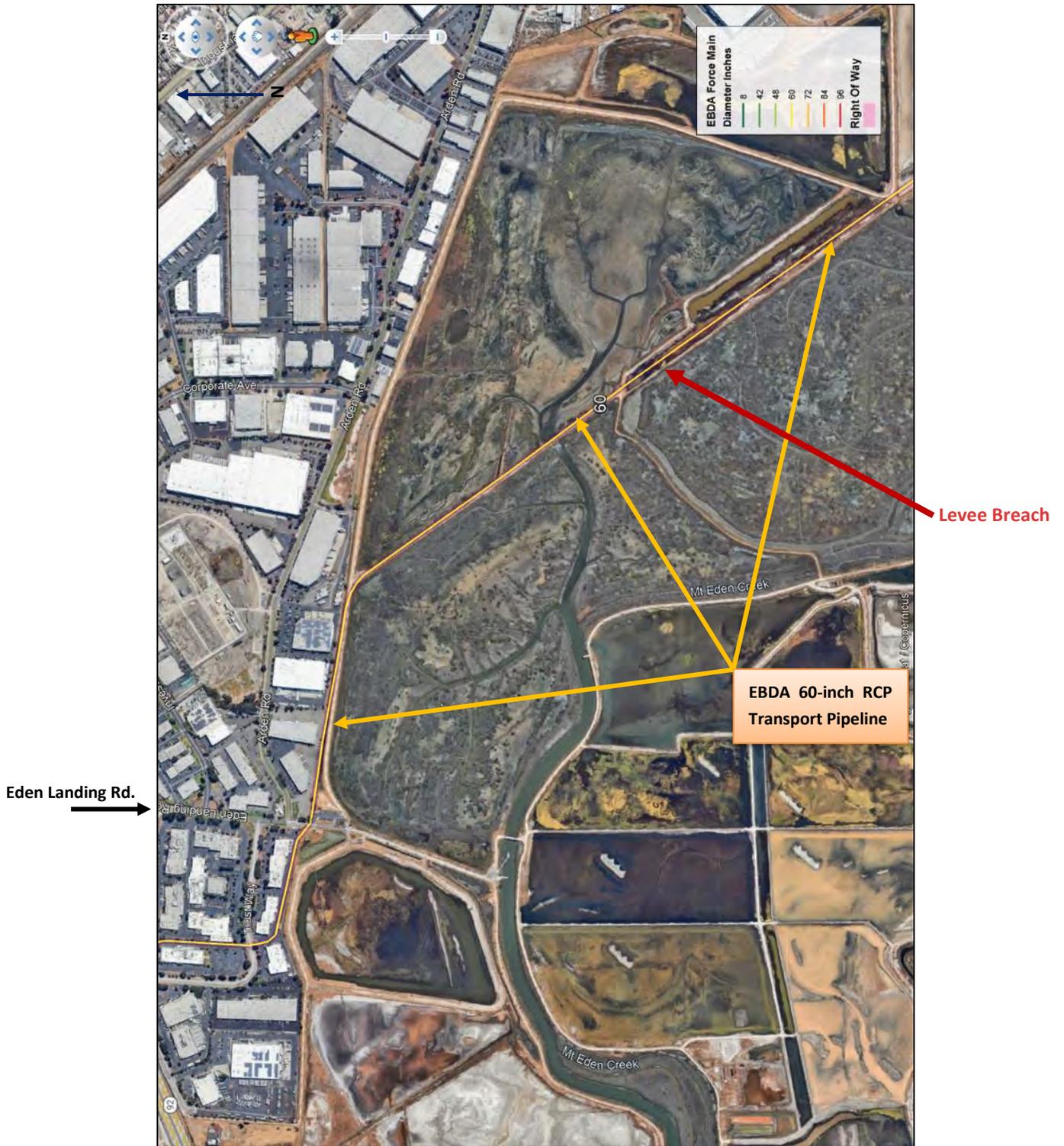


Figure A-4 – EBDA Transport Pipeline alignment mapping. Note levee access to the levee breach from Eden Landing Road to the north crosses the EBDA Transport Pipeline at the San Francisco Bay Trail and closely parallels the EBDA Transport pipeline on an existing levee for a distance of about 2,300 feet (see Figure A-5).

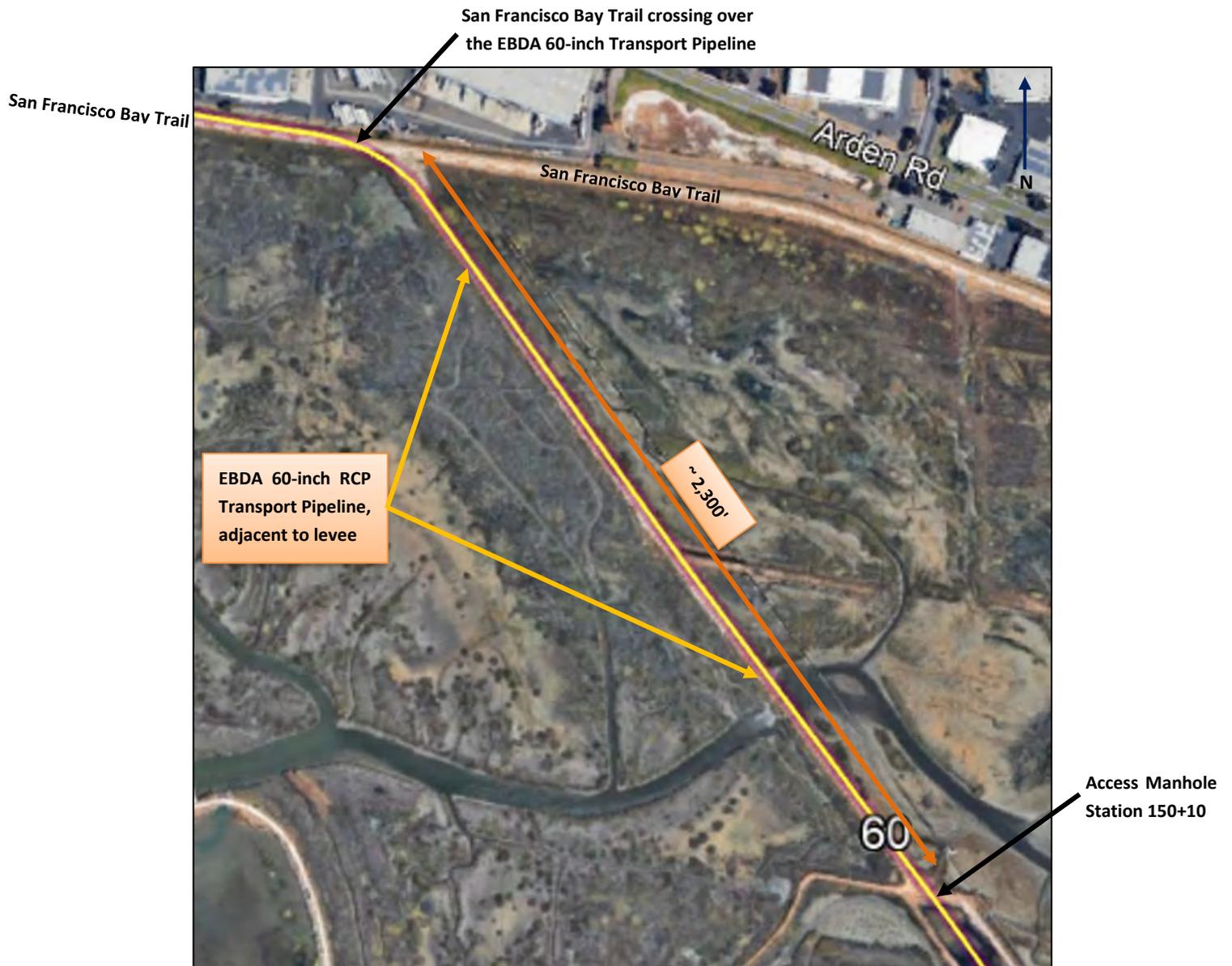


Figure A-5 – EBDA 60-inch Transport Pipeline alignment adjacent and parallel to the existing levee between the San Francisco Bay Trail and EBDA Access Manhole at Station 150+10. See Figure A-6 for profile of San Francisco Bay Trail crossing.

The adjacent and parallel distance is about 2,300 feet along an existing levee. If used for construction access to the levee breach this existing levee must be evaluated for stability with respect to the size and weight of construction equipment. Failure of this levee during construction access could impact the EBDA 60-inch Transport Pipeline.

San Francisco Bay Trail

San Francisco Bay Trail

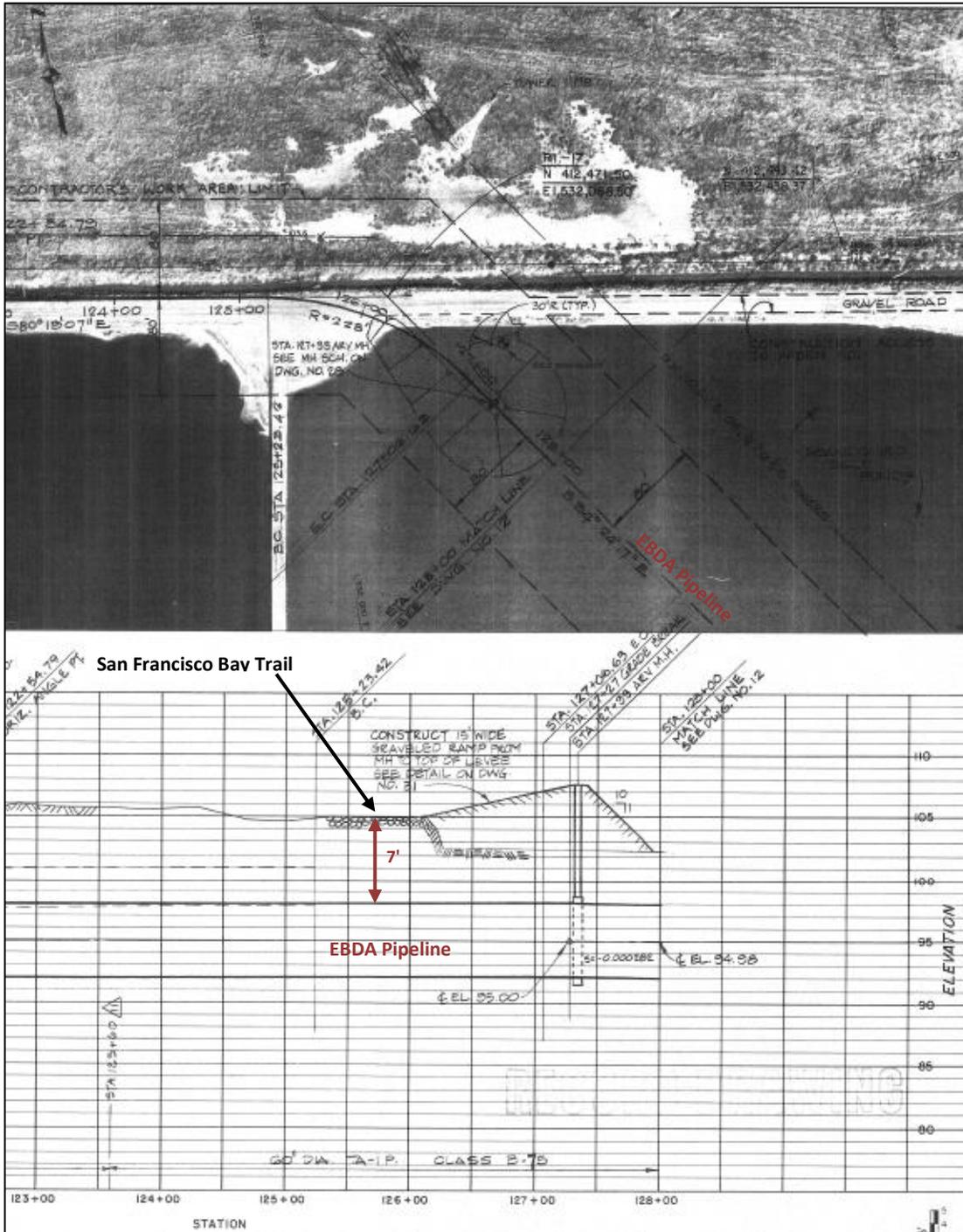


Figure A-6 - Excerpt from 1977 EBDA Transport Pipeline Force Main Plan and Profile Pipeline crossing under the San Francisco Bay Trail at Station 126+00, approximately 1,700 feet east of Eden Landing Road parking lot.

Depth of cover under the Bay Trail is approximately 7 feet.

Note, the levee adjacent and parallel to the EBDA Transport Pipeline shown in Figure A-5 was not present in 1977.