



ITEM NO. 16

REGULATORY AFFAIRS COMMITTEE AGENDA

Tuesday, September 15, 2026 at 1:00 PM

**East Bay Dischargers Authority
2651 Grant Avenue, San Lorenzo, CA and 1730 Hearn Hill Road, Watertown, TN**

**Video Conference link: <https://us02web.zoom.us/j/89655817948>
Call-in: 1(669) 900-6833 and enter Webinar ID number: 896 5581 7948**

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. NACWA Peak Performance Award**
(The Committee will receive information on EBDA's recent award.)
- RA6. NPDES Inspection of Marina Dechlorination Facility**
(The Committee will review the Regional Water Board's Inspection Report.)
- RA7. California Biosolids Cost and Capacity Report**
(The Committee will discuss the recent report.)
- RA8. 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.

Agenda Explanation
East Bay Dischargers Authority
Regulatory Affairs Committee
September 15, 2026

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
November 17, 2026 at 1:00 pm**

ITEM NO. RA5 NACWA PEAK PERFORMANCE AWARD

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

As shown above, one of EBDA's key strategic goals is to maintain consistent compliance with the Authority's NPDES Permit. Through collaboration with the Member Agencies, EBDA has been able to maintain compliance for many years.

The National Association of Clean Water Agencies (NACWA), which EBDA rejoined in 2023, issues Peak Performance Awards to agencies to recognize consistent NPDES compliance. Silver facilities reported five or fewer violations of their NPDES permit in one year. Gold facilities achieved one year of perfect (100%) compliance with their NPDES permits. The Platinum level is reached in the 5th year of achieving consecutive Gold.

Discussion

This year, EBDA was honored with a Silver Award. 2026 Peak Performance Awards reflect permit compliance for calendar year 2025. NACWA recognized 540 treatment facilities at 206 of its member public agencies for outstanding levels of compliance and performance related to their NPDES permit. A full list of NACWA's 2026 Peak Performance Awards can be found [here](#).

ITEM NO. RA6 NPDES INSPECTION OF MARINA DECHLORINATION FACILITY

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.
 - 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.
 - b. Maintain consistent compliance with EBDA's National Pollutant Discharge Elimination System (NPDES) Permit.

Background

Regional Water Quality Control Board (Water Board) staff conducts periodic inspections of permitted facilities including EBDA's Marina Dechlorination Facility (MDF). Inspections are generally performed every other year. The prior inspection at MDF was in 2024.

Discussion

Water Board staff conducted an inspection at MDF on June 25, 2026. The inspection included a walkthrough of the facility and a review of EBDA's recent and planned facility upgrades. In particular, staff showcased EBDA's operating protocols for compliance with the effluent limit for total residual chlorine. Water Board staff also reviewed documentation, including EBDA's Emergency Response Contingency Plan, O&M Manuals, flow meter calibration records, and auxiliary power check logs.

Water Board staff was very complimentary regarding EBDA's operation and compliance record. The complete Inspection Report is attached.

NPDES Compliance Evaluation Inspection (CEI) Report

Facility Name and Location			Entry Date	Entry Time
Marina Dechlorination Facility at EBDA Joint Outfall 14150 Monarch Bay Drive San Leandro, CA 94577			06/25/2026	11:00AM
			Permit Effective Date	Permit Expiration Date
			09/01/2022	08/31/2027
Mailing Address	Same as facility location?	Yes ☐ No ☒		Notified?
East Bay Dischargers Authority 2651 Grant Avenue San Lorenzo, CA 9458			Yes ☒ No ☐	
			If no, rationale:	
CIWQS Inspection ID	64118115	Receiving Water Name	Lower San Francisco Bay	
NPDES Permit Number	CA0037869	County	Alameda	
Order Numbers	R2-2022-0023	Plant Classification	POTW	
Types of Discharge	Major	CIWQS Place ID	222123	
Names and Titles of Onsite Representatives				
Name	Title	Phone	Email	
Jacqueline Zipkin	General Manager	510-278-5910	jzipkin@ebda.org	
Howard Cin	Operations and Maintenance (O&M) Manager	510-362-2501	hcin@ebda.org	
Angelica Berumen	Laboratory Supervisor	510-577-6042	aberumen@sanleandro.org	
Name and Title of Responsible Official				
Name	Jacqueline Zipkin			
Title	General Manager			
Phone	510-278-5910			
Email	jzipkin@ebda.org			
Does responsible official match permit-based contact information on file?				Yes ☒ No ☐
Does grade level comply with plant classification?				Yes ☒ No ☐
Inspector Information		Presented Credentials?		Yes ☐ No ☒
Organization Name	San Francisco Bay Regional Water Quality Control Board			
Title	Natie Lee			
Phone	(510) 622-2325			
Email	Natie.Lee@waterboards.ca.gov			

I. PRE-INSPECTION PERMIT REVIEW

		Yes	No	N/A
Is the facility as described in the permit?		☒	☐	☐
Has the Water Board been notified of any process/production modifications?		☐	☐	☒
Was a permit reissuance application submitted to the Water Board on time?		☐	☐	☒
Was the permit modified prior to any facility or discharge changes?		☐	☐	☒
Discharge Points				
001 – Lower San Francisco Bay (EBDA Common Outfall)				
Facility Class				
Chief Plant Operator	Howard Cin	Grade	III	
Current ADWF	54 MGD (Jun 1 – Aug 31, 2025)			
Permitted ADWF	107.8 MGD			
Peak Design Flow	189.1 MGD			
		Yes	No	N/A
Are current loads less than 80% of design loads?		☐	☐	☒
If no, does annual report describe timing of next plant expansion?		☐	☐	☒
Permitting concerns that might affect inspection process				
N/A				

II. PRE-INSPECTION MONITORING REPORT REVIEW

Summary of effluent limit violations since last inspection			
Constituent	No. of Violations	Corrective Action Reported	No action reported
-	-	-	☐
			☐
			☐
Summary of receiving water violations since last inspection			
Parameter	No. of Violations	No action reported	
Dissolved oxygen	None	☐	
Turbidity	None	☐	
pH	None	☐	
Temperature	None	☐	
Aesthetic issues (e.g., excessive algae, bottom deposits, etc.)	None	☐	
Corrective Actions Reported			
Not applicable.			
Monitoring and Reporting Program violations since last inspection			
	Yes	No	Not Inspected
Responsible person signs and certifies the DMRs and/or SMRs	☒	☐	☐
Discharger monitors at frequency required by permit	☒	☐	☐
All data collected are summarized	☒	☐	☐
Coliform concentrations are calculated as required by permit (median, mean, etc.)	☒	☐	☐
Detection limits are reported	☒	☐	☐
"Less than" and estimated values are properly carried through the calculations	☐	☐	☒
Flow measurement period used for load calculations brackets sampling period	☐	☐	☒
Loading rates are properly calculated	☐	☐	☒
Data reported in time frame and frequency required by permit	☒	☐	☐
Have any spills/bypasses been reported to the Regional Board?	☐	☐	N/A
Dates and times of spills/bypasses			
EBDA has not had any spills or bypasses that reached waters of the state since the Water Board's last inspection on February 8, 2024.			

III. RECORDS AND REPORTS REVIEW

	Required onsite?		Available onsite?			Not Inspected	Comments
	Yes	No	Yes	No	N/A		
Current NPDES permit	☒	☐	☒	☐	☐	☐	
Permit modifications	☐	☐	☐	☐	☒	☐	
Permit amendments	☐	☐	☐	☐	☒	☐	
Compliance orders	☐	☐	☐	☐	☐	☒	
Monitoring and reporting program	☒	☐	☒	☐	☐	☐	
Standard provisions	☒	☐	☒	☐	☐	☐	
Industrial pretreatment program	☒	☐	☒	☐	☐	☒	
Maintenance records and logbook	☒	☐	☒	☐	☐	☐	
Plant operation and maintenance manual	☒	☐	☒	☐	☐	☐	See note below.
Equipment manuals	☐	☐	☐	☐	☐	☒	
Plant engineering drawings	☐	☐	☐	☐	☐	☒	
Collection system drawings	☐	☐	☐	☐	☐	☒	
Maintenance records	☒	☐	☒	☐	☐	☐	
Spill and bypass records	☒	☐	☐	☐	☒	☐	
Pollution prevention plan	☒	☐	☐	☐	☐	☒	
Contingency Plan	☒	☐	☒	☐	☐	☐	See note below.
Spill prevention control and countermeasure (SPCC) plan	☒	☐	☒	☐	☐	☐	See note below.
Operational logs	☒	☐	☒	☐	☐	☐	
Auxiliary power check logs	☐	☐	☒	☐	☐	☐	

Notes

Operations and Maintenance (O&M) Manual

According to EBDA's 2025 Annual Self-Monitoring Report, the O&M Manual is reviewed annually and updated as needed. It was last reviewed in January 2026.

Contingency Plan

EBDA has an Emergency Operating Contingency Plan coordinating actions to be taken between the Marina Dechlorination Facility, EBDA member agency treatment plants, LAVWMA facilities, and joint-use facilities. The plan included emergency contacts and addressed all seven elements required under the Regional Standard Provisions (Attachment G) section I.C.1 as they pertained to the EBDA system. EBDA last reviewed the Contingency Plan in January 2026.

Spill Prevention Control and Countermeasure (SPCC) Plan

The Facility is not required to maintain an SPCC Plan because it does not store, use, consume, or distribute oil above several exemption thresholds described in 40 C.F.R. section 112.1(d) (Oil Pollution Prevention – Generally Applicability). The Facility only holds and consumes sodium bisulfite.

IV. OPERATIONS AND MAINTENANCE REVIEW

		Yes	No	N/A	Not Inspected
Were all records and reports required by permit organized and available?		☒	☐	☐	☐
Was influent flow meter calibration available onsite?		☒	☐	☐	☐
Date of last calibration	9/25/2025				
Calibration performed by...	Calcon Systems				
Was effluent flow meter calibration available onsite?		☒	☐	☐	☐
Date of last calibration	9/25/2025				
Calibration performed by...	Calcon Systems				
Were flow measurement records maintained for past 3 years?		☒	☐	☐	☐
Is a maintenance management program in place?		☒	☐	☐	☐
Number of open work orders	No corrective maintenance				
Oldest date of open work order	N/A				
Are entries to the operational logs made in pen?		☒	☐	☐	☐
Were all operational log entry modifications made with suitable cause?		☒	☐	☐	☐
Were reported spills and bypasses recorded in operational logs?		☐	☐	☒	☐
Is the facility staffing requirement described in O&M manual?		☐	☐	☒	☐
Is the facility staffed in accordance with O&M manual?		☐	☐	☒	☐
Were there auxiliary power check logs?		☒	☐	☐	☐
Air Board permit number	Not inspected				
Notes					
<u>Calibration Records</u> The flow meters for the Hayward Effluent Pump Station, San Leandro Effluent Pump Station, Oro Loma Effluent Pump Station, Union Effluent Pump Station, and Marina Dechlorination Facility are calibrated annually. <u>Work Orders</u> Work orders for the Facility are sent to the City of San Leandro Water Pollution Control Plant for action by San Leandro staff, who perform maintenance on EBDA's behalf. At the time of the inspection, the Facility did not have outstanding corrective maintenance work orders. <u>Staffing</u> The Facility is staffed four hours a day for three days a week. Operations are controlled and monitored via a SCADA system. The SCADA system is equipped with an alarm system in the event of equipment malfunction, and a call system is in place to notify operators on their mobile phones.					

V. MONITORING RECORDS REVIEW

Are monitoring records and laboratory reports retained for 5 years?		Yes ☒	No ☐	N/A ☐	Not Inspected ☐
Are data reported on DMRs/SMRs consistent with analytical results?		☒	☐	☐	☐
Is the onsite laboratory ELAP certified?		☒	☐	☐	☐
Certification Number	2281*				
Expiration Date	11/30/2027				
Parameters measured onsite				N/A ☐	Not Inspected ☒
Total Residual Chlorine Sodium bisulfite Temperature Dissolved Oxygen pH					
Additional parameters used for internal monitoring and process control				☐	☒
Constituents analyzed with hand-held equipment				☐	☒
		Most recent calibration date		Standard expiration date	
Monitoring and Records Review Notes *The City of San Leandro Water Pollution Control Plant laboratory staff analyzes EBDA's combined effluent for pH, dissolved oxygen, and bacteria (enterococcus and fecal coliform). EBDA's contract laboratory, Caltest Analytical Laboratory, analyzes the combined effluent for priority pollutant metals and organics, and subcontracts analyses for PCBs, dioxins, and furans to other certified labs. Pacific Eco-Risk Laboratory analyzes the combined effluent for acute and chronic toxicity.					

VI. MONITORING REPORT REVIEW

	Yes	No	N/A	Not Inspected
Are loading calculations prepared correctly?	☐	☐	☐	☒
Are contract laboratory records and chains of custody available?	☐	☐	☐	☒
Do sampling and analytical records include:				
a. Dates, times, and locations of sampling	☒	☐	☐	☐
b. Names of individuals performing sampling	☒	☐	☐	☐
c. Analytical methods	☒	☐	☐	☐
d. Results of analyses	☒	☐	☐	☐
e. Dates of analyses	☒	☐	☐	☐
f. Times of analyses, as necessary to verify holding times	☒	☐	☐	☐
g. Analysts names or initials	☒	☐	☐	☐
h. Instantaneous flow at grab sample locations, if required	☐	☐	☒	☒
MONITORING PROCEDURES				
Are adequate equipment and procedures used for onsite analyses?				
pH	☐	☐	☐	☒
Dissolved oxygen	☐	☐	☐	☒
Temperature	☐	☐	☐	☒
Turbidity	☐	☐	☐	☒
UV transmittance	☐	☐	☐	☒
Other	☐	☐	☐	☒
Is refrigeration satisfactory?	☐	☐	☐	☒
Are grab samples collected during representative discharge conditions?	☒	☐	☐	☐
Do monitoring locations appear to be appropriate?	☒	☐	☐	☐
Do composite sampling procedures comply with the permit?	☐	☐	☐	☒
Are automatic samplers properly cleaned and maintained?	☐	☐	☐	☒
Are samples adequately preserved?	☐	☐	☐	☒
Are sample containers appropriate for the samples collected?	☐	☐	☐	☒
Are samples collected using appropriate protocols?	☐	☐	☐	☒
Are coliform samples collected directly into sterile containers?	☐	☐	☐	☒
Does coliform sampling occur after the last introduction of wastes?	☐	☐	☐	☒
Is the number of discharge points as described in the permit?	☒	☐	☐	☐
Are the locations of the discharge outfalls as described in the permit?	☒	☐	☐	☐
Is the name of the receiving water as described in the permit?	☒	☐	☐	☐
Is site free of any evidence of spills or bypasses?	☒	☐	☐	☐
Do the sampling and monitoring appear representative of the discharge?	☒	☐	☐	☐
Are groundwater monitoring wells capped and locked?	☐	☐	☒	☐

Notes
Within the Facility's control and sampling room was a four-faucet sink that produced four different streams to sample from: (1) chlorinated influent north of the Facility (effluent from City of San Leandro); (2) chlorinated influent south of the Facility (combined effluent from Oro Loma Sanitary District, City of Hayward, Union Sanitary District, and the Livermore-Amador Valley Water Management Agency); (3) Total combined influent; and (4) Total combined dechlorinated effluent. The O&M Manager explained that the separate sample streams help EBDA track where certain pollutants may be coming from.

VII. FINAL EFFLUENT AND RECEIVING WATER MONITORING

		Yes	No	Not Inspected	
APPEARANCE OF FINAL EFFLUENT					
Condition during the inspection					
Clear (not cloudy)		☒	☐	☐	
Colorless		☒	☐	☐	
Free of sheen		☒	☐	☐	
Free of scum		☒	☐	☐	
Free of foam		☒	☐	☐	
Other		☐	☐		
Notes					
		Yes	No	Upstream condition is similar	Not Inspected
APPEARANCE OF RECEIVING WATER					
Condition during the inspection					
Free of distinctly visible plume		☐	☐	☐	☒
Free of foam and sheen		☐	☐	☐	☒
Free of snails		☐	☐	☐	☒
Free of erosion at the discharge point		☐	☐	☐	☒
Free of bottom deposits		☐	☐	☐	☒
Free of filamentous algae growth		☐	☐	☐	☒
Free of microbial layers on aquatic plants		☐	☐	☐	☒
Other		☐	☐	☐	
Notes					
The receiving water near the discharge point could not be observed because the effluent was discharged through the deepwater outfall about seven miles offshore from the Marina Dechlorination Facility.					

VIII. SITE WALK INSPECTION

Weather and site conditions present during time of inspection					
The weather was clear. There was ongoing construction around the site, but the site itself was walkable without any obstruction.					
Treatment Process (described in permit)	Appeared Compliant	Not Present	Non- Operational	Lacking Maintenance	Not Inspected
Wastewater Treatment					
Dechlorination	☒	☐	☐	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
Notes					
Background The Facility dechlorinates secondary-treated effluent from the following EBDA member agencies: - Oro Loma and Castro Valley Sanitary Districts Water Pollution Control Plant - City of Hayward Water Resource Recovery Facility - City of San Leandro Water Pollution Control Plant - Union Sanitary District Wastewater Treatment Plant Additionally, the Facility dechlorinates secondary-treated effluent from the Livermore-Amador Valley Wastewater Management Agency (LAVWMA) pipeline, which includes combined effluent from the Dublin San Ramon Services District Wastewater Treatment Plant and the City of Livermore Water Reclamation Plant. The effluent from the above facilities (i.e., EBDA's influent) is received by two converging force mains: one 48 inches in diameter from the City of San Leandro Water Pollution Control Plant (i.e., influent entering the Facility from the north) and one 96 inches in diameter from all other contributing facilities (i.e., influent entering the Facility from the south). Dechlorination occurs through injecting sodium bisulfite into the pipeline after convergence of the force mains. Two 6,000-gallon tanks of sodium bisulfite (previously maintained at 5,500 gallons each when refilled but has since been adjusted to 1,500 gallons each following the adoption of Order R2-2023-0023) supply the dechlorinating agent through a metering pump at proportions dependent on flow and residual chlorine concentration. The Facility has two flow meters and sodium bisulfite is dosed based on total residual chlorine (TRC) analyzer readings (see details below under "Facility Upgrades/Operation Changes"). The Facility maintains three sodium bisulfite metering pumps; one is operated at a time while two are backups. The active pump is regularly rotated to ensure all three are functional. Observations The Facility appeared well maintained and free of potential hazards. The O&M Manager and General Manager provided all requested documents prior to the onsite visit and answered all questions. The O&M Manager also provided documents on the day of the inspection showing operations and maintenance records, with entries made each day that personnel are on site. The force mains at the Facility appeared to be in good condition, and all operating pumps appeared to be in working order. The Facility doses its discharge with sodium bisulfite using two inductors that inject sodium bisulfite into the effluent pipeline. The inductors appeared to be in working order. The O&M Manager explained that, in the past, the Facility mixed its discharge with sodium bisulfite using a chemical mixer called the Water Champ, which provided rapid mixing and diffusion of sodium bisulfite in the effluent pipeline, but the Water Champ was decommissioned due to the impracticality of replacing parts.					

Sodium bisulfite was stored within secondary containment in a locked building. The O&M Manager explained that the building contains heaters to prevent sodium bisulfite from crystallizing in cold temperatures. The heaters were set to prevent temperatures from dipping below 18 degrees Celsius. Within the sodium bisulfite containment building were three sodium bisulfite pumps, three sodium bisulfite flow meters, and three uninterruptible power supply boxes for the three sodium bisulfite pumps. There is also an uninterruptible power supply to support EBDA's programmable logic controller in the control room in the event of a power outage.

EBDA continuously measures total residual chlorine (TRC) in the influent and effluent and continuously monitors the effluent for sodium bisulfite.

Facility Upgrades/Operation Changes

Operational Changes due to Water Quality-Based Chlorine Effluent Limit

With the adoption of Order R2-2023-0023, EBDA's chlorine effluent limit increased from an instantaneous maximum of 0.0 mg/L to an initial dilution-based one-hour arithmetic mean of 0.98 mg/L (to decrease to 0.94 mg/L after EBDA begins accepting Cargill brine). This has dramatically reduced EBDA's reliance on sodium bisulfite. The O&M Manager explained that, prior to this change, EBDA dosed sodium bisulfite at two to three times the necessary amount to ensure compliance with its previous effluent limitation of 0.0 mg/L.

The O&M Manager explained the following Dechlorination Control Strategy from EBDA's Chlorine Process Control Plan:

Dechlorination Control Strategy

The primary dechlorination control strategy is based on the Influent Chlorine Residual with a secondary dechlorination control strategy based on the Effluent Chlorine Residual.

Primary Dechlorination Control Strategy – Influent Chlorine Residual

The Programmable Logical Controller (PLC) that controls the operations at MDF will automatically start a sodium bisulfite (SBS) pump once the Influent Chlorine Residual is above 0.48 mg/L for 30 seconds. The PLC is constantly calculating the amount of SBS necessary to reduce the Influent Chlorine Residual to 0.48 mg/L. The SBS pump will operate at the calculated value or the minimum pump speed, whichever is greater. The minimum SBS pump speed is set between 6-10 gallons per hour (gph). Once the Influent Chlorine Residual drops below 0.48 mg/L for 30 seconds, the SBS pump will turn off.

Secondary Dechlorination Control Strategy – Effluent Chlorine Residual

The PLC that controls the operations at MDF will automatically start a SBS pump once the Effluent Chlorine Residual is above 0.5 mg/L for 30 seconds. The PLC is constantly calculating the amount of SBS necessary to reduce the Influent Chlorine Residual to 0.5 mg/L. The SBS pump will operate at the calculated value or the minimum pump speed, whichever is greater. The minimum SBS pump speed is set between 6-10 gph. If the Effluent Chlorine Residual is still above 0.5 mg/L, every 30 seconds, the SBS pump will increase by 10 gph, with a maximum increased value of 40 gph. Once the Effluent Chlorine Residual drops below 0.5 mg/L for 30 seconds, the SBS pump will reduce its speed by 10 gph every 30 seconds until the SBS pump turns off.

In the event of a power failure, the SBS pump would automatically dose three times the Influent Chlorine Residual at the time of the power failure.

The O&M Manager explained that because the sodium bisulfite system was now being used infrequently, EBDA regularly runs exercises to ensure its proper function. Every 8 hours, if the dosing system is not on at that time, a pump automatically turns on for 3 minutes, dosing at a rate of about 20 gph of sodium bisulfite. This pattern is rotated so that in a 24-hour cycle, each of the 3 pumps is run at least once. Additionally, once a month, each pump runs for approximately 20 minutes to keep all lines flushed.

Main Breaker and Automatic Transfer Switch (ATS) Upgrades

The O&M Manager explained the main breaker was upgraded in June 2024 as Phase I of the Marina Dechlorination Facility Electrical Upgrade Project. Phase II includes the replacement of the ATS electronic controls. The digital display of the ATS was not working, but the ATS itself was otherwise fully functional. The O&M Manager estimated that the ATS replacement would take place before the end of summer 2026.

SCADA System Upgrade

In December 2025, EBDA upgraded its SCADA computer and implemented the latest version of SCADA software. The O&M Manager explained that the old system ran in parallel with the new system for two months before fully transitioning over to the new system on December 10, 2025. The new SCADA system has been operating without issue since then.

Rip Rap Restoration

The O&M Manager explained that, on October 27 and 28, 2025, the rip rap on a 60-foot by 40-foot stretch of the levee along the Bay in front of the Marina Dechlorination Facility Meter Vault was restored. The meter vault contains flow meters and effluent sample pumps, which are critical to reporting and demonstrating permit compliance. This restoration will provide protection for the meter vault against future storms and king tides, particularly as sea level rises.

Force Main Adaptation

The General Manager explained that the portion of the converging force mains located at the Facility, which conveys influent and discharges effluent to and from the Facility, is made of steel, despite its concrete exterior. EBDA may accept up to 2 MGD of brine from Cargill, and if the brine were connected upstream of the Facility, EBDA would need to use plastic coating to adapt the interior of the force mains to prevent corrosion because steel is vulnerable to corrosion caused by brine. The option that was under serious consideration at the time of the inspection was to repurpose an abandoned jet fuel pipeline and construct new pipelines that connect from Cargill's solar salt ponds in Newark to the jet fuel pipe, which will then be connected to the EBDA common outfall downstream of the Facility. By connecting downstream of the Facility, the need to protect the force mains from corrosion is averted. According to the General Manager, design and entitlements for this project are expected to be completed in 2027 and construction would begin between 2028 to 2030.

EMERGENCY OPERATION	Yes	No	N/A	Not Inspected
Is available back-up power appropriate for emergency conditions?	☒	☐	☐	☐
Are there alarms systems for power and equipment failure?	☒	☐	☐	☐
Are treatment control procedures established for emergencies?	☒	☐	☐	☐
Notes				
The Facility has a 150-kilowatt backup generator, which can power the entire Facility for 10 hours before requiring additional diesel. The Facility was also equipped with an alarm system that will notify personnel present at the Facility, the O&M Manager, EBDA's operations center, and the City of San Leandro when a power failure occurs.				
According to the O&M Manager, during the winter storms on December 31, 2022, through January 2, 2023, the Facility ran the generator for 36 hours straight with no issues. To ensure the generator kept running, EBDA refueled the tank every 6 hours with diesel supplied by the City of San Leandro.				

CHEMICALS ONSITE	MSDS Available?		Secondary Containment?		Not Inspected
	Yes	No	Yes	No	
Sodium bisulfite	☐	☐	☒	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐
Is spill clean-up and containment equipment available?			Yes ☒	No ☐	N/A ☐
Notes					
The Facility was equipped with a chemical spill kit in its storage room.					

SITE WALK OPERATION AND MAINTENANCE INSPECTION

	Yes	No	N/A	Not Inspected
Maintenance program appears to be in place and being followed	☒	☐	☐	☐
Lift stations appear properly maintained and have back-up power	☐	☐	☒	☐
Odors are adequately controlled, including...	☐	☐	☒	☐
Ponds	☐	☐	☒	☐
Headworks	☐	☐	☒	☐
Sludge processing facilities	☐	☐	☒	☐
Storage appears to control leachate and runoff	☒	☐	☐	☐
Public access to storage is prevented	☒	☐	☐	☐
No safety concerns were observed that might interfere with proper O&M or monitoring	☒	☐	☐	☐
Flow devices appear to be property installed and maintained, and operating without interference	☒	☐	☐	☐
Notes				
The sodium bisulfite storage building has a ladder with a guard attached to it, which EBDA staff installed after finding evidence of people climbing onto the roof after-hours. The Facility has a barbed wire fence surrounding it to prevent people from climbing over. All buildings remain locked and inaccessible to the public.				

Photo Log

June 25, 2026

**EAST BAY DISCHARGERS AUTHORITY
MARINA DECHLORINATION FACILITY**

DAILY INFORMATION & CHECKLIST

Day/Date: <u>Wed</u> <u>6/24/26</u>		Time: <u>6:24</u> HR	
Instantaneous Outfall Flow Rate @ Time Of Sampling: <u>39.6</u> MG		Operator: <u>WJ</u>	

TOTAL RESIDUAL CHLORINE PPM		24 Hour Average Influent TRC & Effluent Flow	
Analyzer No.	DPD Analysis	No. 1 Flow Meter	No. 2 Flow Meter
Inf. TRC	<u>0.30</u>	<u>57.79</u> MG	<u>56.72</u> MG
Eff. TRC	<u>0.41</u>	Influent TRC <u>0.209</u> PPM	
Eff. TRC	<u>0.42</u>	SBS TRIM ADJUST Today <u>1.00</u> Previous <u>1.00</u>	

Total Residual Chlorine Analyzers			SBS Tanks		
Reagent Levels	Analyzer No. 1 TRC	Analyzer No. 2 TRC	Gallons Recd	Tank No. 1	Tank No. 2
pH 4 Buffer	<u>2/3</u>	<u>2/3</u>	Level	<u>2963</u>	<u>2956</u>
125 Gram KI	<u>2/3</u>	<u>2/3</u>	Previous	<u>1390</u> WJ	<u>1399</u> WJ
Adjustments Made	<u>Yes</u>	<u>Yes</u>	Level Today	<u>2945</u>	<u>2942</u>
Y Strainer Cleaned	<u>✓</u>	<u>✓</u>	Total Gal SBS Used	<u>18</u>	<u>0</u>
			No. of Days	<u>2</u>	<u>26</u>

Chemical Feed Pumps				Sump Pumps		Sewage Pumps	
Meter Readings	Pump No. 1	Pump No. 2	Pump No. 3	Pump No. 1	Pump No. 2	Pump No. 1	Pump No. 2
Today				<u>17369.3</u>	<u>9698.5</u>	<u>10277.9</u>	<u>11287.9</u>
Previous				<u>17369.0</u>	<u>9698.4</u>	<u>10258.5</u>	<u>11264.3</u>
Run Time Hrs				<u>0.3</u>	<u>0.1</u>	<u>19.4</u>	<u>23.6</u>

Injector Pumps		Dechlor Pumps		Cleaning & Station Checks Attended To	
Meter Readings	Pump No. 2	Pump No. 3	Pump No. 3	Pump No. 4	Fire Alarm Panel
Today	<u>7364.8</u>	<u>4536.6</u>	<u>70095.7</u>	<u>58376.5</u>	<u>Valve Box Sump Pump Float Switch</u>
Previous	<u>7364.8</u>	<u>4536.6</u>	<u>70095.7</u>	<u>58376.5</u>	
Run Time Hrs	<u>0</u>	<u>48.2</u>	<u>0</u>	<u>48.2</u>	

Sampler: No. 1 <u>DO</u> No. 2 <u>DO</u>	
Analyzer Sample Supply Line	Strainers <u>Flushed</u> Injector Pump Suction Line
#4 Sample Tap DO	<u>DO</u> @ <u>Temp.</u>
	<u>1.77</u> <u>0904</u> <u>24.3</u>

Remarks: Clean sampler head tank every day: ✓ Flush #4 sample line every day: ✓

Is the bisulfite storage room fan on? ✓

ARV Valves Exercised? Main: ✓ Meter: ✓

Injector Pump Vac Range: -22.1 -20

Injector Pump PSI Range: 62.1 -64

Daily Perimeter Fence Check? Yes: ✓ No: ✓

Weekly Generator Black Heat Check? Yes: ✓ No: ✓

[https://sanleandro.sharepoint.com/sites/WPCPStaff/Shared Documents/LABORATORY/LAB_WORKSHEETS/EBDA/EBDA_MASTER_books_rev062424](https://sanleandro.sharepoint.com/sites/WPCPStaff/Shared%20Documents/LABORATORY/LAB_WORKSHEETS/EBDA/EBDA_MASTER_books_rev062424)

Figure 1. EBDA personnel use a checklist to ensure proper operation and maintenance at the Facility.

**EAST BAY DISCHARGERS AUTHORITY
MARINA DECHLORINATION FACILITY
TOTAL RESIDUAL CHLORINE BENCH SHEET**

ANALYZE TRC GRAB SAMPLES WITHIN 15 MINUTES FROM TIME OF COLLECTION					SINGLE LINE STRIKE-THROUGH FOR MISTAKES				
DATE	STD #	MDF-COLOR-02 Secondary Check Standards	Acceptable Range (mg/L)	ANALYZER #	FAUCET #	Time of Collection	Time of Analysis	Total Residual Chlorine mg/L	
6/19/26									
DAY	Fri								
FLOW, MGD	62.5	STD #1	0.18	0.12 - 0.30		1	0934	0938	0.60
		STD #2	0.81	0.77 - 0.97		2	1032	1036	0.09
ANALYST	WK	STD #3	1.55	1.39 - 1.67	1	3	1037	1040	0.20
					2	4	1041	1044	0.22
6/22/26									
DAY	Mon.								
FLOW, MGD	62.1	STD #1	0.17	0.12 - 0.30		1	0825	0829	0.53
		STD #2	0.81	0.77 - 0.97		2	0830	0833	0.07
ANALYST	PH	STD #3	1.55	1.39 - 1.67	1	3	0820	0824	0.33
					2	4	0945	0948	0.45
6/24/26									
DAY	Wed								
FLOW, MGD	39.0	STD #1	0.17	0.12 - 0.30		1	0812	0815	0.67
		STD #2	0.81	0.77 - 0.97		2	0816	0819	0.08
ANALYST	WK	STD #3	1.55	1.39 - 1.67	1	3	0820	0823	0.33
					2	4	0824	0828	0.42
DATE		STD #	MDF-COLOR-02 Secondary Check Standards	Acceptable Range (mg/L)	ANALYZER #	FAUCET #	Time of Collection	Time of Analysis	Total Residual Chlorine mg/L
DAY									
FLOW, MGD		STD #1		0.12 - 0.30		1			
		STD #2		0.77 - 0.97		2			
ANALYST		STD #3		1.39 - 1.67	1	3			
					2	4			

DPD ST# 061124-001

Sec. gel standards ST# 031025-004

TRC: SM4500-Cl-G-2011

[https://sanleandro.sharepoint.com/sites/WPCPStaff/Shared Documents/LABORATORY/LAB_WORKSHEETS/EBDA/EBDA_MASTER_books_rev062424](https://sanleandro.sharepoint.com/sites/WPCPStaff/Shared%20Documents/LABORATORY/LAB_WORKSHEETS/EBDA/EBDA_MASTER_books_rev062424)

Figure 2. EBDA personnel record internal sample readings each day they are present onsite.



Figure 3. Chlorine analyzers.



Figure 4. Influent and effluent sampling station.



Figure 5. The Facility's sodium bisulfite storage building contained two 6,000-gallon tanks of sodium bisulfite.



Figure 6. Three sodium bisulfite pumps.

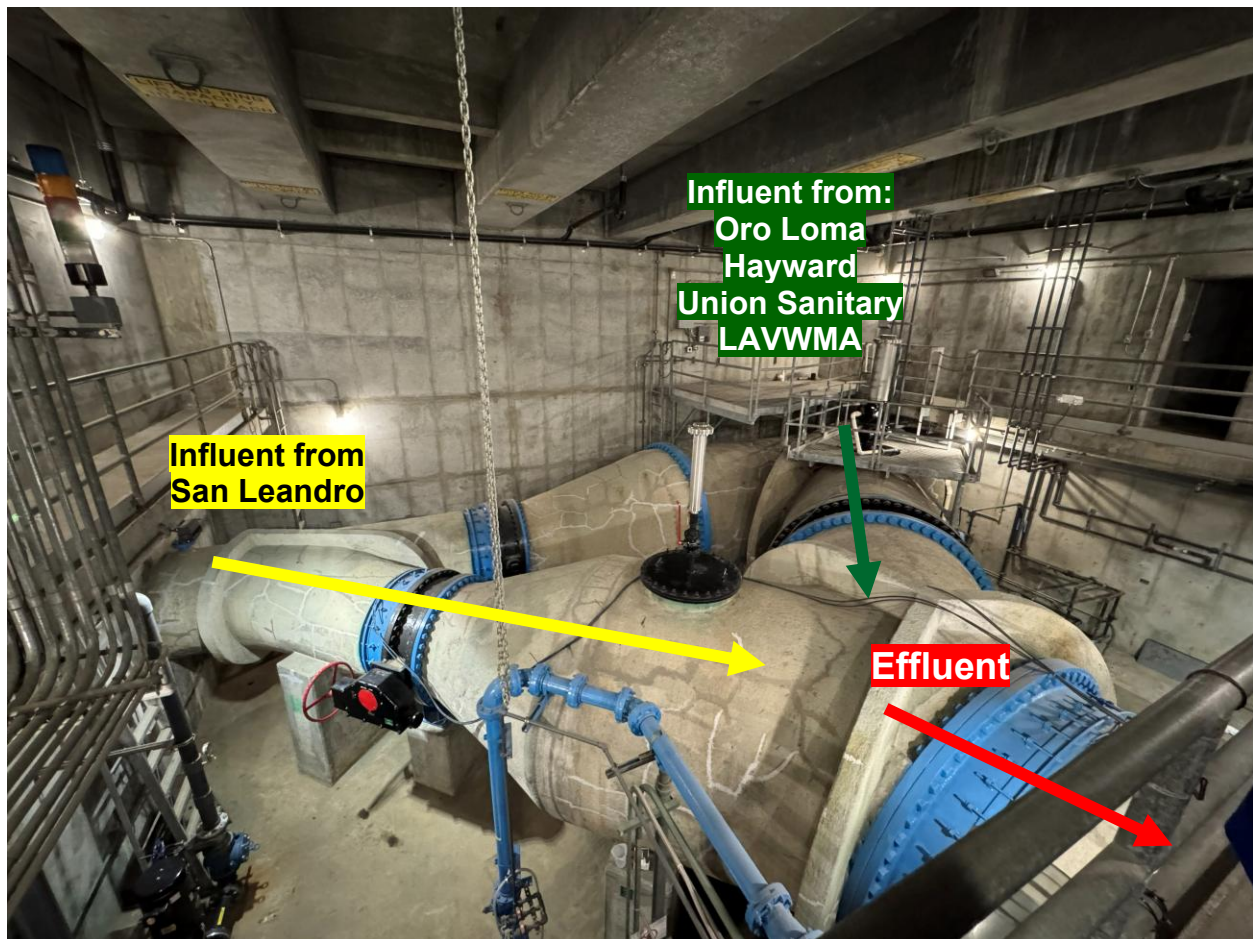


Figure 7. Influent from EBDA member agencies and LAVWMA is pumped to the Facility through converging force mains. Sodium bisulfite is injected into the converged influent.

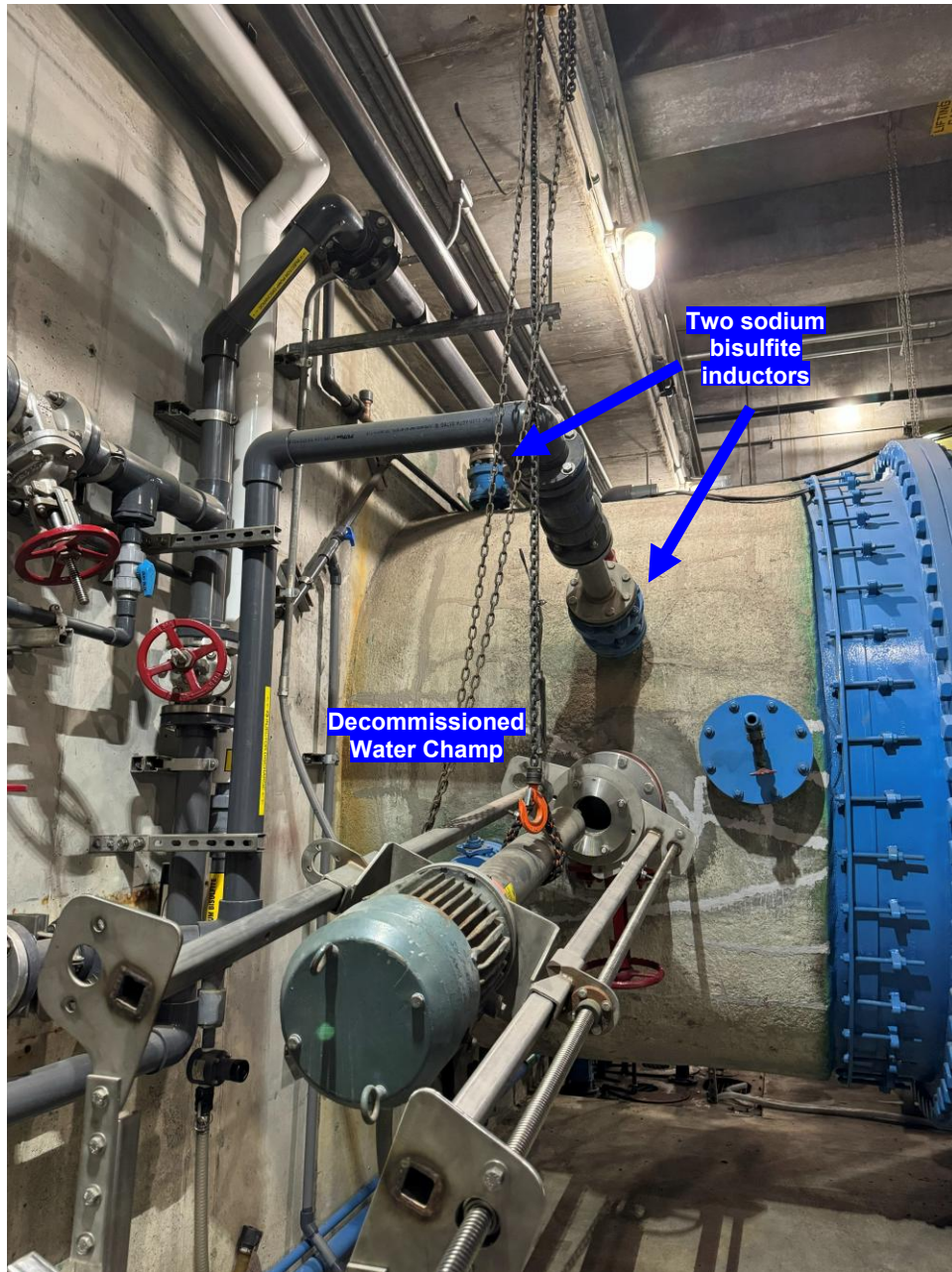


Figure 8. Sodium bisulfite is injected into effluent pipeline by two inductors immediately following the convergence of the two influent force mains. The decommissioned chemical mixer, or Water Champ, used to be EBDA's primary method of mixing its dechlorinating agent.



Figure 9. EBDA's backup generator was enclosed.



Figure 10. EBDA staff installed a guard on the ladder attached to the sodium bisulfite building.



Figure 11. EBDA restored the rip rap on a 60-foot by 40-foot stretch of the levee along the Bay in front of the Marina Dechlorination Facility Meter Vault.

ITEM NO. RA7 CALIFORNIA BIOSOLIDS COST AND CAPACITY 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.
 - 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.
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

Beneficial use of biosolids is facing increasing public scrutiny and state-level legislative actions due to concerns, in large part, around PFAS and emerging contaminants. Maine banned land application of any products containing biosolids in 2022, and several other states have since considered similar measures.

Discussion

In response to these threats to an important beneficial use pathway for biosolids, several regional biosolids associations, including California Association of Sanitation Agencies (CASA) and Bay Area Clean Water Agencies/Bay Area Biosolids Coalition (BACWA/BABC), in partnership with biosolids management providers around the country, initiated a project to assess current biosolids management practices, landfill capacities for biosolids, and potential cost and environmental impacts at the state level if biosolids beneficial use (i.e. land application, compost, etc.) were banned or restricted in specific states. A Brown and Caldwell/Carollo Engineers team was selected to complete this work in New York, Pennsylvania, Virginia, Illinois, California, and Florida.

Carollo led the California work, which is documented in a technical [report](#), set of [slides](#), and the attached legislative briefing [document](#), summarizing the study's key findings and implications for wastewater agencies, farmers, and ratepayers in the state. These documents are intended to inform policy discussions, stakeholder outreach, and engagement with legislators and other decisionmakers. The intent of this effort is to inform stakeholders about the true capacity of landfills for biosolids disposal and the potential impacts on greenhouse gas emissions and ratepayer costs before biosolids beneficial use bans or restrictions are implemented.



A PRACTICAL GUIDE TO BIOSOLIDS MANAGEMENT IN CALIFORNIA

Avoiding an Affordability Crisis

Decades Supporting Farmers and a Sustainable Future

Biosolids are nutrient-rich material produced during wastewater treatment. When returned to the soil, this valuable resource improves soil health, retains water, and recycles nutrients.

California generates around 3.5 million wet tons of biosolids annually, enough to fill 160,070 tractor trailers. For decades, the state has partnered with farmers and landowners to recycle biosolids as a sustainable alternative to commercial fertilizers.

PFAS in Everyday Products and Biosolids

PFAS chemicals - including PFOA and PFOS - were used widely in manufacturing of products such as cosmetics, food packaging, pesticides, dental floss, and clothing. These substances persist in the environment and accumulate in our bodies. As a result, PFAS are measurable in wastewater and biosolids, though at levels much lower than many consumer products.

If the goal of a biosolids land application ban would be to reduce PFAS in the environment, forcing biosolids to landfills and incineration may not achieve that goal. According to the EPA, studies estimate that as much as 15% of mobile PFAS entering a landfill are emitted via leachate and landfill gas, while most landfills lack PFAS treatment. Exhaust from incineration may also contain PFAS that is not destroyed within the process.

Consequences of a Ban or Severe Restrictions on Land Application

There are limited options for managing biosolids: (1) land application, (2) landfilling, and (3) incineration (burning). Land application returns nutrients to the soil via well-regulated beneficial use practices. Potential future restrictions on land application could result in significant unintended consequences. For example, Maine and Florida have documented that the biosolids management costs increased by 175% to 300% following the loss of land application outlets.

Universal bans and severe restrictions on land application, without consideration for PFAS concentration or health risks, force local utilities to rely on costly and less sustainable disposal options.

Landfills are not a Long-Term Solution

A ban on land application in California would leave roughly 2.5 million wet tons of biosolids currently land applied in California and Arizona to be trucked to California landfills or out-of-state. This volume exceeds the state's estimated additional landfill capacity for 'wet' waste by 137%. Biosolids would be wholly forced out of state, where capacity is similarly limited and costs are high. Furthermore, sending more organic material like biosolids to landfills conflicts with California's SB 1383 goal to divert organics from landfills to reduce methane emissions in support of statewide climate objectives.



California recycles approximately **2.53 million wet tons of biosolids** annually, benefiting farmers and the environment while avoiding greenhouse gas emissions equivalent to driving **86,770 cars**.

According to US EPA's Enforcement and Compliance History Online (ECHO) Database



A ban on land application of biosolids would **increase greenhouse gas emissions by an estimated 174%**, which conflicts with California's SB 1383 goal of reducing organics disposal by 75% by 2025 (organics include biosolids)—increasing methane-related climate impacts.

According to CalRecycle SB 1383 Short-Lived Climate Pollutant Reduction Strategy and Brown and Caldwell/Carollo's 2026 California Biosolids Capacity Analysis Study

SB 1383 would have to be revised by legislators to allow biosolids landfilling, and landfill operators would need to accept this material which they are increasingly unwilling or unable to do, so this is not a realistic option.

Incineration Capacity Constraints

California currently has only one operational biosolids incineration facility, which is 45 years old. The state's stringent air-quality standards, siting constraints, and public opposition makes the approval and construction of additional biosolids incineration capacity highly unlikely in the foreseeable future.

Restrictions Risk Affordability for Ratepayers and Farmers

A ban or severe restriction on land application of biosolids would further strain utilities struggling to maintain affordable services for their customers. According to a study conducted by Policy Navigation Group on behalf of Association of Metropolitan Water Agencies, water utilities and ratepayers across the country are already facing an estimated \$6.4 billion in compliance costs to meet emerging PFAS regulations. A ban on biosolids land application would dramatically add to these costs, further burdening ratepayers. Additionally, a ban would drive up costs for the agricultural community by removing access to a reliable, nutrient-rich soil amendment and requiring farmers to purchase costly carbon-intensive synthetic fertilizers.

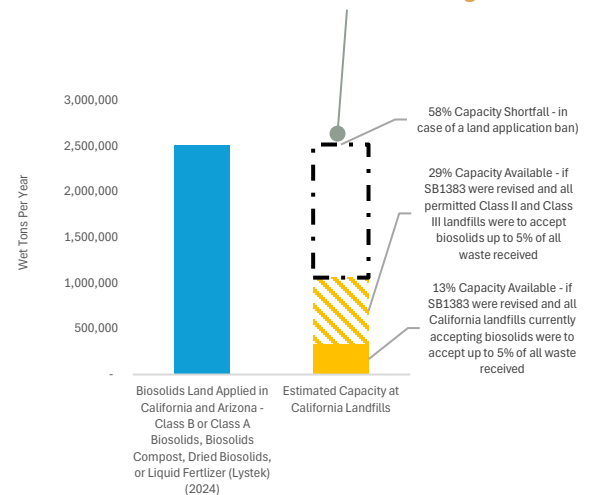
California's reliance on Arizona for biosolids management further amplifies the risks associated with future land application restrictions. Approximately 15% of California's biosolids are already being managed in the state of Arizona. Any disruptive legislative action on land application in California could trigger more reliance on out-of-state options, which, in turn, could result in retaliatory legislative actions in those states and long-term ratepayer impacts. In fact, recent language of Arizona House Bill 2640 could limit land application of biosolids or biosolids-based products by December 2027. Should this or other similar bills pass, it would force even more California biosolids back into the state's already limited landfill capacity.

A Responsible Path Forward

California can continue to protect public health and the environment without sacrificing sustainability or affordability. Legislators and regulators can advance responsible management of PFAS in biosolids through the following:

1. **MAINTAIN PROTECTIVE POLICIES:** Continue emphasizing source control and monitoring to reduce PFAS impacts prior to biosolids land application.
2. **MANAGE PFAS AT THE SOURCE:** Continue and strengthen policies related to PFAS use in commercial products and industrial processes, and support pollution prevention programs.
3. **PROTECT FARMERS AND RATEPAYERS:** Avoid policies that abruptly eliminate recycling and beneficial use and force utilities into high-cost landfill or out-of-state options. Help keep farmers in business and farmland in production through the higher yields and lower costs provided by biosolids.
4. **INVEST IN INNOVATION AND TREATMENT:** Fund research, pilot projects, source-control programs, and technologies that reduce PFAS before biosolids are generated or beneficially used.
5. **SUPPORT CLIMATE GOALS AND REGIONAL BIOSOLIDS MANAGEMENT:** Align biosolids policy with SB 1383 methane reduction and climate resiliency goals by preserving beneficial biosolids reuse options. Regulations should consider the impacts to all stakeholders to avoid unintended consequences for California ratepayers and farmers.

A ban on land application of biosolids would leave 1.4 to 2.1 million wet tons of biosolids with nowhere to go in California



Alternatively, Michigan's data-driven policies successfully reduced PFAS concentration in biosolids by 95% without creating unnecessary economic hardships for public utilities and ratepayers.

According to the Michigan Department of Environment, Great Lakes, and Energy (EGLE)

Maine's land application ban caused costs to increase by 175% on average.

According to the Maine Water Environment Association



Learn More

For additional information on PFAS and Biosolids Management, scan the QR code above to visit the California Association of Sanitation Agencies. www.casaweb.org