

**REGULAR MEETING
OF THE BOARD OF DIRECTORS
OF THE LIVERMORE-AMADOR VALLEY WATER MANAGEMENT AGENCY**

Wednesday, August 19, 2026 6:00 p.m.

**Dublin San Ramon Services District Board Room
7051 Dublin Boulevard
Dublin, California**

- 1. Call to Order**
- 2. Pledge of Allegiance**
- 3. Roll Call**
- 4. Order of Agenda/Acknowledgement of Posting**
(The agenda may be re-ordered by motion of the Board. The agenda has been posted virtually on the Agency's website and physically in the display case outside the DSRSD Building, and, as a courtesy when possible, under the circumstances, at Pleasanton City Hall and Livermore City Hall at least 72 hours prior to a regular meeting and 24 hours prior to a special meeting.)
- 5. Public Comment**
(See text in box below for information on how to observe and submit public comments.)
- 6. Consent Calendar**
(All items on the Consent Calendar will be considered together by one or more action(s) of the Board unless a Board member pulls an item.)
 - 6.a. Board Meeting Minutes for the May 20, 2026 meeting**
(The Board will consider approving the minutes from the May 20, 2026 Board meeting.)
- 7. Financial Reporting for the Fiscal Year Ending June 30, 2026**
(The Board will review the LAVWMA Treasurer's Quarterly Report of Cash and Investments for the 4th Quarter of Fiscal Year 2025-26, and other financial items for the Fiscal Year ending June 30, 2026.)
- 8. Records and Retention Policy**
(The Board will review and consider approving Resolution No. 26-02 adopting a Records and Information Management Policy and Retention Schedule and rescinding Resolution No. 03-04.)
- 9. LAVWMA NPDES Permit – October 1, 2026 - September 30, 2031**
(The Board will receive an update on the renewal of LAVWMA's NPDES Permit.)
- 10. LAVWMA Quarterly Report of Operations, 4th Quarter, FY2025-26**
(The Board will receive the Quarterly Report of Operations, 4th Quarter, FY2025-26.)
- 11. Update on LAVWMA Asset Management Projects**
(The Board will receive an update on the status of various capital projects.)

**Action
Pages 3-6**

**Information
Pages 7-12**

**Action
Pages 13-68**

**Information
Pages 69-193**

**Information
Pages 194-214**

**Information
Pages 215-240**

LAVWMA Regular Meeting of August 19, 2026

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| Action
Pages 241-247 | 12. San Leandro Sample Station Project Authorization to Proceed
(The Board will consider authorizing the General Manager to proceed with unanticipated dewatering plan necessary to complete work on the San Leandro Sample Station Upgrade Project.) |
| Information
Pages 248-259 | 13. Update and Response to Various Legal and Legislative Issues
(The Board will receive a report on legislation and developments affecting LAVWMA and its member agencies.) |
| Information
Pages 260-352 | 14. General Manager's Report
(The Board will review the General Manager's Report regarding the operations and maintenance of LAVWMA and its facilities.) |
| | 15. Matters From/For Board Members
(Board members may make brief announcements or reports on his or her own activities, pose questions for clarification, and/or request that items be placed on a future agenda. Except as authorized by law, no other discussion or action may be taken.) |
| | 16. Next Regular Board Meeting, Wednesday, November 18, 2026, 6:00 p.m. at DSRSD |
| | 17. Adjournment |

HOW TO SUBMIT PUBLIC COMMENTS:

Written / Read Aloud: Please email your comments to info@lavwma.com, write "Public Comment" in the subject line. In the body of the email, include the agenda item number and title, as well as your comments. If you would like your comment to be read aloud at the meeting (not to exceed three (3) minutes at staff's cadence), prominently write "Read Aloud at Meeting" at the top of the email. All comments received before 12:00 PM the day of the meeting will be included as an agenda supplement on LAVWMA's website under the relevant meeting date and provided to the Directors at the meeting. Comments received after this time will be treated as live comments and read into the record.

Live Comments: During the meeting, the Board Chair or designee will announce the opportunity to make public comments. Speakers will be asked to provide their name and city of residence, although providing this is not required for participation. Each speaker will be afforded up to 3 minutes to speak.

ACCESSIBILITY INFORMATION:

Board Meetings are accessible to people with disabilities and others who need assistance. Individuals who need special assistance or a disability-related modification or accommodation (including auxiliary aids or services) to observe and/or participate in this meeting and access meeting-related materials should contact Levi Fuller, General Manager, as soon as possible but at least 72 hours before the meeting at (707) 373-7030 or info@lavwma.com. Advanced notification will enable LAVWMA to swiftly resolve such requests to ensure accessibility.

PUBLIC RECORDS:

Public records that relate to any item on the open session agenda for a meeting are available for public inspection. Those records that are distributed after the agenda posting deadline for the meeting are available for public inspection at the same time they are distributed to all or a majority of the members of the Board. The Board has designated LAVWMA's website located at <https://lavwma.com/meetings/> as the place for making those public records available for inspection. The documents may also be obtained by contacting the General Manager.

CEQA NOTICE:

Unless expressly stated otherwise on the agenda (that a negative declaration, mitigated negative declaration, or environmental impact report is being considered), discretionary actions taken on agenda items will include a finding by the Board that the action is exempt under the California Environmental Quality Act (CEQA). More information about the CEQA determination can be found in the corresponding staff report.

LAVWMA
Livermore-Amador Valley Water Management Agency
DRAFT
Minutes
Regular Meeting of Board of Directors
Wednesday, May 20, 2026
6:00 p.m.

1. Call to Order

Chair Jeff Nibert called the meeting to order at 6:00 p.m.

2. Pledge of Allegiance

3. Roll Call

Present: Chair Jeff Nibert, Vice Chair Steven Dunbar and Directors Richard Halket, Evan Branning, Arun Goel and Julie Testa

LAVWMA Staff Present: General Manager/Treasurer Levi Fuller, General Counsel Alexandra Barnhill, Administrative Assistant Sheree Davis, and Finance Consultant Tracy Fuller (participated via teleconference)

Member Agency Staff Present: Dublin San Ramon Services District (DSRSD) Operations Director Dan Gill and Water Resources Division Manager of the City of Livermore, Anthony Smith

4. Order of Agenda/Acknowledgement of Posting

There were no changes to the agenda and the Board acknowledged that the agenda had been properly posted.

5. Public Comment

There were no comments from the public.

6. Consent Calendar

6.a. Board Meeting Minutes for the February 18, 2026 meeting

The Board considered the Meeting Minutes from the February 18, 2026 Board meeting.

Director Goel – Motion to approve the February 18, 2026 minutes, Director Branning – Seconded

Ayes – 6

Noes – 0

There were no comments from the public. The Motion passed unanimously (6 – 0).

7. Annual Board Rotation – Elect Chair and Vice Chair for Fiscal Year 2026/27

The Board acknowledged the traditional rotation that would make a Director from Livermore Chair and a Director from Dublin San Ramon Services District Vice Chair for FY2026/27.

Director Goel nominated Vice Chair Dunbar for Chair and Director Halket as Vice Chair for FY2026/27. Both nominees agreed to serve and nominations were closed.

Director Goel – Motion to approve Director Dunbar as Chair and Director Halket as Vice Chair, Director Branning – Seconded

Ayes – 6

Noes – 0

There were no comments from the public. The Motion passed unanimously (6 – 0).

8. Public Hearing and Status Update on LAVWMA Employment Vacancies in Compliance with Assembly Bill 2561 (2024)

General Counsel Barnhill provided the Board with an update on AB 2561, noting the annual requirement for public agencies to report employment vacancies. Although LAVWMA has no direct employees as all work is performed through contracts, the agency continues to comply with the reporting requirement.

The public was informed that LAVWMA has no direct employees.

The public hearing was opened. There were no comments from the public and the hearing was closed. The Board received the report and record of it will be filed.

9. Financial Reporting for the Fiscal Year Ending June 30, 2026

General Manager Fuller presented the Board with a high-level overview of LAVWMA's financial status. Funds continue to be invested primarily in CAMP (approximately 4.35% interest rate) and LAIF (approximately 4.24% interest rate) per Board direction. The Repair and Replacement Budget spent 44% of its \$4.5 million allocation, with some projects continuing into next year. The Treasurer's Q3 FY2025-26 report reflected \$17M invested, including \$16M in CAMP.

Information item only. No public comments.

This was an information item only requiring no action by the Board.

There were no comments from the public.

10. Proposed Operating and Capital Budget for Fiscal Year 2026/27

GM Fuller presented proposed adjustments to the current FY budget, including a \$341,197 increase for EBDA Special Projects (NPDES permit, Regional Monitoring Program, Nutrient Charges, and Air Toxic Study). Staff also requested approval of the FY26/27 budget totaling \$12,712,548: approximately \$5.6M for O&M agreements with DSRSD and

EBDA, \$7M for bond payments (remaining balance is \$35M, and the original balance was \$173M), and \$1,648,300 for Capital Repair and Replacement Projects.

Director Branning – Motion to approve the budget amendment and approve staff’s proposed operating and capital budget for FY 2026/27, Director Goel – Seconded

Ayes – 6

Noes – 0

There were no comments from the public. The Motion passed unanimously (6 – 0).

11. Update to Investment Policy

GM Fuller requested approval of the Board to update Investment Policy (Resolution 26-01), rescinding Resolution 24-03. The update affirms LAVWMA’s ability to invest in LAIF and CAMP, with staff monitoring rates for potential investment in CalTRUST or CLASS.

Director Goel – Motion to approve Resolution 26-01 and rescind Resolution 24-03, Director Branning – Seconded

Ayes – 6

Noes – 0

There were no comments from the public. The Motion passed unanimously (6 – 0).

12. LAVWMA Quarterly Report of Operations, 3rd Quarter, FY2025-26

The Board received a summarized overview of LAVWMA’s Quarterly Report of Operations for the 3rd Quarter, FY2025-2026.

This was an information item only requiring no action by the Board. There were no comments from the public.

13. Update and Response to Various Legal and Legislative Issues

General Counsel Alexandra Barnhill provided an update on legal and legislative matters. Current legislative items from BACWA and CASA were included as attachments. No bills required Board attention.

This was an information item only requiring no action by the Board. There were no comments from the public.

13. General Manager’s Report

The Board received a detailed overview of General Manager Fuller’s administrative, financial and CIP operations and maintenance efforts for the 3rd Quarter, including updates on the draft NPDES permit and solar project. Following discussion, the Board expressed continued interest in solar and encouraged staff to keep the issue under consideration and maintain a dialogue with DSRSD.

This was an information item only requiring no action by the Board. There were no comments from the public.

15. Matters From/For Board Members

There were no matters from/for Board members.

16. Next Regular Board Meeting, Wednesday, August 19, 2026, 6:00 p.m. at DSRSD

The next Board meeting will be held in DSRSD's Board Room.

17. Adjournment

There being no further action, Chair Nibert adjourned the meeting at 6:58 p.m.

Minutes Approved by the Board on August 19, 2026.

Submitted by,

Levi Fuller
General Manager

**ITEM NO. 7 FINANCIAL REPORTING FOR THE FOURTH QUARTER OF FISCAL
YEAR 2025-2026**

To: LAVWMA Board of Directors

From: Levi Fuller, General Manager

Subject: Financial Reporting for the three months ending June 30, 2026

Action Requested

None at this time. This is an information item only.

Summary

Attached are the Treasurer's Quarterly Reports of Operations for the 4th Fiscal Quarter of FY 2025-2026. Figures for the three-month period from April 1, 2026, through June 30, 2026, seen in Attachments A and B are preliminary and subject to change because the period is still open for recordation of accruable items, and have not been audited.

Budgets in **Attachments A and B** reflect the budget appropriations approved by the Board on May 21, 2025.

The Treasurer's Report in **Attachment C** reflects LAVWMA'S banking relationships as well as its pooled investments.

Attachment D provides the General Management Quarterly Expense Listings, organized by 1) Effective Date and 2) Vendor, and reflects payments made directly by LAVWMA to vendors.

LAVWMA directly pays invoices that are presented to LAVWMA for payment. However, DSRSD receives and pays invoices also, typically joint capital project activities. DSRSD engineering and operations staff continue to receive, review, and discuss these directly-received invoices with LAVWMA's General Manager prior to payment by DSRSD. These payments are then included in DSRSD's monthly aggregate invoice to LAVWMA.

Attachments

- A. Operations and Maintenance Fund Budget vs. Actual
- B. Capital Improvement Projects Budgets vs. Actuals
- C. Treasurer's Quarterly Report of Financial Activity – Shows reconciliation of LAVWMA's cash balances between its accounting records and its banks' and investment pools' records.
- D. General Management Quarterly Expenses Listings by Effective Date and by Vendor

LIVERMORE-AMADOR VALLEY WATER MANAGEMENT AGENCY

Operations and Maintenance - Budget vs Actual

April - June of the 2025-2026 Fiscal Year

	April 2025 - June 2025 PREVIOUS FISCAL YEAR FOR COMPARISON					April 2026 - June 2026 CURRENT FISCAL YEAR			
	ANNUAL BUDGET	YEAR TO DATE ACTUALS	DOLLAR VARIANCE	ACTUAL AS A PERCENTAGE OF BUDGET		ANNUAL BUDGET	YEAR TO DATE ACTUALS	DOLLAR VARIANCE	ACTUAL AS A PERCENTAGE OF BUDGET
OPERATING REVENUES									
Service charges - DSRSD	\$ 1,544,597	\$ 1,544,597	\$ -	100%		\$ 1,559,415	\$ 1,559,415	\$ -	100%
Service charges - City of Pleasanton	1,894,367	1,894,367	-	100%		1,904,984	1,904,984	-	100%
Service charges - City of Livermore	1,669,330	1,669,330	-	100%		1,678,319	1,678,319	-	100%
Service charges - Reconciled	-	183,737	183,737	0%		-	-	-	0%
Total operating revenues	5,108,294	5,292,031	183,737	104%		5,142,718	5,142,718	-	100%
OPERATING EXPENDITURES									
Utilities - Power	2,065,755	1,805,894	(259,861)	87%		2,025,350	1,867,751	(157,599)	92%
LAVWMA share of EBDA O&M - Fixed	742,098	635,526	(106,572)	86%		546,437	546,438	1	100%
LAVWMA share of EBDA O&M - Variable	266,042	477,189	211,147	179%		278,445	278,446	1	100%
DSRSD Operations Agreement	1,442,894	1,288,415	(154,479)	89%		1,550,385	1,547,776	(2,609)	100%
Professional services	623,000	419,296	(203,704)	67%		542,900	536,529	(6,371)	99%
City of Livermore sole use O&M	25,000	28,898	3,898	116%		25,000	7,428	(17,572)	30%
Insurance	106,620	141,217	34,597	132%		148,816	139,394	(9,422)	94%
Permits	25,385	20,000	(5,385)	79%		25,385	23,456	(1,929)	92%
Repairs and Maintenance	-	-	-	0%		-	-	-	0%
Dues and Subscriptions	-	-	-	0%		-	17,745	17,745	0%
Miscellaneous	-	6,182	6,182	0%		-	6,930	6,930	0%
Total operating expenses	5,296,794	4,822,617	(474,177)	91%		5,142,718	4,971,893	(170,825)	97%
Operating income (loss)	(188,500)	469,414	(657,914)			-	170,825	(170,825)	
NON-OPERATING REVENUE (EXPENSE)									
Amortization/Depreciation	-	-	-	0%		-	-	-	0%
EBDA Debt	-	-	-	0%		-	-	-	0%
Other Expenses	-	-	-	0%		-	-	-	0%
Interest Income	-	37,434	(37,434)	0%		-	27,996	(27,996)	0%
Total non-operating revenue (expense)	-	37,434	(37,434)	0%		-	27,996	(27,996)	0%
Net Income	\$ (188,500)	\$ 506,848	\$ (695,348)			\$ -	\$ 198,821	\$ (198,821)	

LIVERMORE-AMADOR VALLEY WATER MANAGEMENT AGENCY

Repair and Replacement Activity - Budget vs Actual

April - June of the 2025-2026 Fiscal Year

	ANNUAL BUDGET vs YEAR-TO-DATE ACTUAL REVENUES AND EXPENDITURES BY FUND														
	2021 Debt Service			Joint-Use Repair & Replacement			Dual-Use Repair & Replacement			Sole-Use Repair & Replacement			Total		
	ACTUAL AS A			ACTUAL AS A			ACTUAL AS A			ACTUAL AS A			ACTUAL AS A		
	BUDGET	Y-T-D ACTUAL	PERCENTAGE OF BUDGET	BUDGET	Y-T-D ACTUAL	PERCENTAGE OF BUDGET	BUDGET	Y-T-D ACTUAL	PERCENTAGE OF BUDGET	BUDGET	Y-T-D ACTUAL	PERCENTAGE OF BUDGET	BUDGET	Y-T-D ACTUAL	PERCENTAGE OF BUDGET
REPAIR & REPLACEMENT REVENUES															
Service charges - DSRSD	\$2,584,997	\$2,309,146	89%	\$ 139,800	\$ 139,800	100%	\$ -	\$ -	0%	\$ -	\$ -	0%	\$ 2,724,797	\$ 2,448,946	90%
Service charges - City of Pleasanton	2,211,405	1,975,420	89%	139,800	139,800	100%	-	-	0%	-	-	0%	\$ 2,351,205	\$ 2,115,220	90%
Service charges - City of Livermore	1,849,498	1,652,134	89%	120,400	120,400	100%	-	-	0%	-	-	0%	\$ 1,969,898	\$ 1,772,534	90%
Service - Due from members - City of Livermore	50	-	0%	-	54,486	0%	-	-	0%	-	-	0%	\$ 50	\$ 54,486	108972%
Subtotal service charges	6,645,950	5,936,700	89%	400,000	454,486	114%	-	-	0%	-	-	0%	\$ 7,045,950	\$ 6,391,186	91%
OTHER REVENUES															
Interest income	-	848	0%	-	650,661	0%	-	1,721	0%	-	15,538	0%	\$ -	\$ 668,767	0%
Other income	-	-	0%	-	-	0%	-	-	0%	-	-	0%	\$ -	\$ -	0%
Total Repair & Replacement Revenues	6,645,950	5,937,548	89%	400,000	1,105,147	276%	-	1,721	0%	-	15,538	0%	\$ 7,045,950	\$ 7,059,953	100%
REPAIR & REPLACEMENT EXPENDITURES															
Annual Reserve for Non-routine Expenses	-	-	0%	400,000	459,131	115%	-	-	0%	-	-	0%	\$ 400,000	\$ 459,131	115%
Non-routine Repairs & Capital Projects	-	-	0%	4,500,697	2,695,672	60%	-	-	0%	75,000	74,495	99%	\$ 4,575,697	\$ 1,996,028	44%
Principal Bond Payments	5,125,000	5,125,000	100%	-	-	0%	-	-	0%	-	-	0%	\$ 5,125,000	\$ 5,125,000	100%
Interest Bond Payments	1,520,900	1,520,900	100%	-	-	0%	-	-	0%	-	-	0%	\$ 1,520,900	\$ 1,520,900	100%
Miscellaneous	50	2,350	4700%	-	-	0%	-	-	0%	-	2,963	0%	\$ 50	\$ 5,313	10626%
Total Repair & Replacement Expenditures	6,645,950	6,648,250	100%	4,900,697	3,154,803	64%	-	-	0%	75,000	77,458	103%	\$ 11,621,647	\$ 9,880,511	85%
Net Cash Flow	\$ -	\$ (710,702)	0%	\$ (4,500,697)	\$ (2,049,656)	46%	\$ -	\$ 1,721	0%	\$ (75,000)	\$ (61,920)	83%	\$ (4,575,697)	\$ (2,820,558)	62%

Percentage of Budget will display as 0% if no budget was established.

LIVERMORE-AMADOR VALLEY WATER MANAGEMENT AGENCY
TREASURER'S REPORT
As of 6/30/2026

	Bank of America and Chase Bank	Bank of America	Chase Bank
Beginning Balances 4/1/2026	\$232,724	\$118,959	\$113,765
RECEIPTS / TRANSFERS IN:			
Receipts	\$0	\$0	
Transfers from BoFA Checking Account	\$0	\$0	\$0
Transfers from CAMP Investment Account	\$1,105,000	\$905,000	\$200,000
Transfers from LAIF Investment Account	\$0	\$0	
Interest Earned	\$485	\$485	
	<u>\$1,105,485</u>	<u>\$905,485</u>	<u>\$200,000</u>
DISBURSEMENTS / TRANSFERS OUT:			
Disbursements to Vendors	\$1,203,767	\$1,001,486	\$202,281
Transfer to Chase Bank	\$0	\$0	
Transfer to CAMP Investment Acct	\$0	\$0	
Bank Fees	\$797	\$767	\$30
	<u>\$1,204,564</u>	<u>\$1,002,253</u>	<u>\$202,311</u>
Net Cash Flow	<u>(\$99,079)</u>	<u>(\$96,768)</u>	<u>(\$2,311)</u>
Balances Per Bank Statements 6/30/2026	<u>\$133,645</u>	<u>\$22,192</u>	<u>\$111,454</u>
Outstanding Wires	\$0	\$0	\$0
Deposit in Transit	\$0	\$0	\$0
Balance Per Books 6/30/2026	<u>\$133,645</u>	<u>\$22,192</u>	<u>\$111,454</u>
CASH & INVESTMENT SUMMARY Per BOOKS:			
Bank of America Checking	\$22,192		
Chase Bank Checking	\$111,454		
California Asset Management Program (CAMP)	\$15,362,001		
Local Agency Investment Fund (LAIF)	\$527,952		
TOTAL LIQUIDY BALANCE PER BOOKS	<u>\$16,023,598</u>		
CASH & INVESTMENT SUMMARY Per INSTITUTIONS:			
Bank of America Checking	\$22,192		
Chase Bank Checking	\$111,454		
California Asset Management Program (CAMP)	\$15,362,001		
Local Agency Investment Fund (LAIF)	\$527,952		
Outstanding Transactions	\$0		
TOTAL LIQUIDY BALANCE PER INSTITUTIONS	<u>\$16,023,598</u>		
		Monthly Distribution Yield: April 3.78%; May 3.76%; June 3.77%	
		Average Monthly Effective Yields 2025: April 3.811%; May 3.810%; June 3.816%	

I certify that this report reflects all Government Agency pooled investments and is in conformity with the investment policy of Livermore-Amador Valley Water Management Agency.

The investment program herein shown provides sufficient cash flow liquidity to meet the next six month's expenses.

Levi Fuller

Approver

8/13/2026

Date

Item No. 7 - Attachment D

Livermore-Amador Valley Water Management Agency
General Management Expenses Listing By Effective Date (Traditional Sort)
April 2026 - June 2026

CHECK DATE	PAYMENT METHOD	VENDOR NAME	ITEM DESCRIPTION	AMOUNT
04/10/2026	Bank Check	RECORDS CONTROL SERVICES, INC.	Records Digitization Project	\$4,983.35
04/27/2026	Bank Check	EOA, INC.	NPDES Annual Permit Reissuance Assistance	\$487.50
04/29/2026	Bank Check	FULLER MANAGEMENT & PROCESS OPERATIONAL SERVI	Management Services	\$13,984.45
04/29/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$12,568.00
04/29/2026	Bank Check	ORO LOMA SANITARY DISTRICT	Discharge Fee	\$1,627.00
04/29/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$8,621.25
04/30/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$11,168.00
04/30/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$12,431.67
05/01/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$14,591.13
05/06/2026	Bank Check	BAY AREA AIR QUALITY MANAGEMENT DISTRICT	Air Quality Permit	\$564.00
05/06/2026	Bank Check	COMPUTER COURAGE	03/26 Website Maintenance Support	\$225.00
05/06/2026	Bank Check	FIELDMAN ROLAPP & ASSOC DBA APPLIED BEST PRACTIC	Debt Disclosure Services	\$3,000.00
05/06/2026	Bank Check	HYDROSCIENCE ENGINEERS INC	Construction Management	\$10,175.00
05/06/2026	Bank Check	KERMANI CONSULTING GROUP	FEMA Consulting Services for Livermore Pipeline	\$12,274.50
05/06/2026	Bank Check	STOEL RIVES LLP	NPDES Annual Permit Reissuance Legal Services	\$440.00
05/07/2026	Bank Check	COMPUTER COURAGE	Website Maintenance Support	\$112.50
05/20/2026	Bank Check	MAZE & ASSOCIATES	2025 Financial Statements - ACFR	\$1,500.00
05/26/2026	Bank Check	FULLER MANAGEMENT & PROCESS OPERATIONAL SERVI	Management Services	\$9,825.26
06/01/2026	Bank Check	BLACKBAUD INC.	Software Services	\$245.00
06/01/2026	Bank Check	STOEL RIVES LLP	NPDES Annual Permit Reissuance Legal Services	\$1,650.00
06/02/2026	Bank Check	CAROLLO ENGINEERS, INC.	San Leandro Sample Station Design & Construction Management	\$4,444.75
06/02/2026	Bank Check	HYDROSCIENCE ENGINEERS INC.	Construction Management	\$5,234.50
06/02/2026	Bank Check	KERMANI CONSULTING GROUP	FEMA Consulting Services for Livermore Pipeline	\$5,872.50
06/02/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$11,058.10
06/03/2026	Bank Check	ARUN GOEL	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	EVAN BRANNING	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	JEFFREY P. NIBERT	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	JULIE TESTA	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	RICHARD M. HALKET	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	STEVEN DUNBAR	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	COMPUTER COURAGE	Website Maintenance Support	\$37.50
06/03/2026	Bank Check	HYDROSCIENCE ENGINEERS INC	Construction Management	\$4,017.75
06/03/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$9,914.00
06/04/2026	Bank Check	FASTSIGNS	Nameplates: Dunbar; Halket	\$55.75
06/05/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$8,864.00
06/08/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$10,656.78
06/22/2026	Bank Check	FULLER MANAGEMENT & PROCESS OPERATIONAL SERVI	Management Services	\$13,342.89
06/24/2026	Bank Check	EOA, INC.	NPDES Annual Permit Reissuance Assistance	\$2,112.50
06/25/2026	Bank Check	COMPUTER COURAGE	Website Maintenance Support	\$75.00
06/25/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$4,921.30
Bank Checks				\$202,280.93
04/08/2026	Wire	DSRSD	Operations & Maintenance Services	\$389,157.41
05/04/2026	Wire	HYDROSCIENCE ENGINEERS INC	Construction Management	\$100,056.10
05/20/2026	Wire	DSRSD	Operations & Maintenance Services	\$318,067.33
06/25/2026	Wire	DSRSD	Operations & Maintenance Services	\$194,204.92
Wires				\$1,001,485.76

Item No. 7 - Attachment D

Livermore-Amador Valley Water Management Agency
General Management Quarterly Expenses By Vendor (New Sort)
April 2026 - June 2026

CHECK DATE	PAYMENT METHOD	VENDOR NAME	ITEM DESCRIPTION	AMOUNT
04/10/2026	Bank Check	RECORDS CONTROL SERVICES, INC.	Records Digitization Project	\$4,983.35
06/03/2026	Bank Check	ARUN GOEL	Board Meeting Attendance - 05/20/2026	\$200.00
05/06/2026	Bank Check	BAY AREA AIR QUALITY MANAGEMENT DISTRICT	Air Quality Permit	\$564.00
06/01/2026	Bank Check	BLACKBAUD INC.	Software Services	\$245.00
06/02/2026	Bank Check	CAROLLO ENGINEERS, INC.	San Leandro Sample Station Design & Construction Management	\$4,444.75
05/06/2026	Bank Check	COMPUTER COURAGE	03/26 Website Maintenance Support	\$225.00
05/07/2026	Bank Check	COMPUTER COURAGE	Website Maintenance Support	\$112.50
06/25/2026	Bank Check	COMPUTER COURAGE	Website Maintenance Support	\$75.00
06/03/2026	Bank Check	COMPUTER COURAGE	Website Maintenance Support	\$37.50
06/24/2026	Bank Check	EOA, INC.	NPDES Annual Permit Reissuance Assistance	\$2,112.50
04/27/2026	Bank Check	EOA, INC.	NPDES Annual Permit Reissuance Assistance	\$487.50
06/03/2026	Bank Check	EVAN BRANNING	Board Meeting Attendance - 05/20/2026	\$200.00
06/04/2026	Bank Check	FASTSIGNS	Nameplates: Dunbar; Halket	\$55.75
05/06/2026	Bank Check	FIELDMAN ROLAPP & ASSOC DBA APPLIED BEST PRACTIC	Debt Disclosure Services	\$3,000.00
05/26/2026	Bank Check	FULLER MANAGEMENT & PROCESS OPERATIONAL SERVI	Management Services	\$9,825.26
06/22/2026	Bank Check	FULLER MANAGEMENT & PROCESS OPERATIONAL SERVI	Management Services	\$13,342.89
04/29/2026	Bank Check	FULLER MANAGEMENT & PROCESS OPERATIONAL SERVI	Management Services	\$13,984.45
05/06/2026	Bank Check	HYDROSCIENCE ENGINEERS INC	Construction Management	\$10,175.00
06/03/2026	Bank Check	HYDROSCIENCE ENGINEERS INC	Construction Management	\$4,017.75
06/02/2026	Bank Check	HYDROSCIENCE ENGINEERS INC.	Construction Management	\$5,234.50
04/29/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$12,568.00
04/30/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$11,168.00
06/03/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$9,914.00
06/05/2026	Bank Check	JARVIS FAY LLP	Legal Services	\$8,864.00
06/03/2026	Bank Check	JEFFREY P. NIBERT	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	JULIE TESTA	Board Meeting Attendance - 05/20/2026	\$200.00
05/06/2026	Bank Check	KERMANI CONSULTING GROUP	FEMA Consulting Services for Livermore Pipeline	\$12,274.50
06/02/2026	Bank Check	KERMANI CONSULTING GROUP	FEMA Consulting Services for Livermore Pipeline	\$5,872.50
05/20/2026	Bank Check	MAZE & ASSOCIATES	Audit of LAVWMA's 2025 Financial Statements	\$1,500.00
04/29/2026	Bank Check	ORO LOMA SANITARY DISTRICT	Discharge Fee	\$1,627.00
04/29/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$8,621.25
04/30/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$12,431.67
05/01/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$14,591.13
06/02/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$11,058.10
06/08/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$10,656.78
06/25/2026	Bank Check	REGIONAL GOVERNMENT SERVICES	Financial & Administrative Services	\$4,921.30
06/03/2026	Bank Check	RICHARD M. HALKET	Board Meeting Attendance - 05/20/2026	\$200.00
06/03/2026	Bank Check	STEVEN DUNBAR	Board Meeting Attendance - 05/20/2026	\$200.00
05/06/2026	Bank Check	STOEL RIVES LLP	NPDES Annual Permit Reissuance Legal Services	\$440.00
06/01/2026	Bank Check	STOEL RIVES LLP	NPDES Annual Permit Reissuance Legal Services	\$1,650.00
Bank Checks				\$202,280.93
04/08/2026	Wire	DSRSD	Operations & Maintenance Services	\$389,157.41
05/04/2026	Wire	HYDROSCIENCE ENGINEERS INC	Construction Management	\$100,056.10
05/20/2026	Wire	DSRSD	Operations & Maintenance Services	\$318,067.33
06/25/2026	Wire	DSRSD	Operations & Maintenance Services	\$194,204.92
Wires				\$1,001,485.76

ITEM NO. 8 APPROVE A REVISED RECORDS AND RETENTION POLICY FOR LAVWMA

To: LAVWMA Board of Directors

From: Levi Fuller, General Manager

Subject: Approve Resolution 26-02 Adopting a Revised Records & Retention Policy and Records and Retention Schedule

Action Requested

The Board to consider approving a revised records and retention policy.

Summary

LAVWMA is governed by the California Public Records Act (Government Code § 7920 et seq.) In addition, State Record Retention Laws (California Government Code § 60201 *et seq.*) sets forth requirements for the retention and destruction of specific public records for special districts. As a joint powers agency, LAVWMA will use these provisions as guidance for its records retention practices in the management of its records. The LAVWMA Board last approved a records and retention policy on November 19, 2003. Staff recommend that the Board update LAVWMA's records and retention policy.

Staff's proposed Records and Retention Policy and Schedule modernize the requirements governing the characterization, retention and destruction of LAVWMA records to reflect changes in the law and best practices that have evolved in more than 20 years since LAVWMA adopted its current regulations. Because DSRSD is currently the contract operator for LAVWMA and conducts engineering projects for LAVWMA and any LAVWMA records managed by DSRSD staff require input from and coordination with LAVWMA's General Manager and General Counsel, the Policy and Schedule largely mirror DSRSD's recently adopted documentation. This should achieve administrative efficiencies..

LAVWMA desires a robust, cost-effective solution to manage current electronic documents and allow conversion of physical records into a trustworthy electronic document repository software system. It is LAVWMA's understanding that several system providers are available to meet LAVWMA's requirements. On October 14, 2025, LAVWMA issued a Request for Proposals ("RFP"), to request proposals from qualified firms to provide the services to assist LAVWMA in digitizing its records. On January 20, 2026, LAVWMA entered into an agreement with Records Control Services, Inc, to assist with this records management project. Phase 1 of the project is reviewing LAVWMA's existing records and retention policy and updating the policy to meet current minimum retention requirements. Subsequent phases will include evaluating physical and electronic records storage and management systems, assessing cost-effective Electronic Document Management Systems (EDMS) software providers and recommending a system to allow creation, management, storage and sharing of LAVWMA's electronic documents. Train staff on the EDMS and develop a plan to import existing LAVWMA documents both physical and electronic into EDMS.

Recommendation

Consider adopting Resolution 26-02 – Records Retention Policy and Records Retention Schedule 2026

Attachments

- A. Resolution 26-02 – Records and Retention Policy
- B. Records and Retention Schedule 2026
- C. Records and Retention Policy 03-04
- D. Records and Retention Schedule 2003
- E. Records and Retention Policy 8/11/2026

LIVERMORE-AMADOR VALLEY WATER MANAGEMENT AGENCY

RESOLUTION NO. 26-02

**RESOLUTION ADOPTING A RECORDS AND INFORMATION MANAGEMENT
POLICY AND REVISED RECORDS RETENTION SCHEDULE AND RESCINDING
RESOLUTION NO. 03-04**

WHEREAS, the Livermore-Amador Valley Water Management Agency (“LAVWMA” or “Agency”) creates, receives, maintains, and manages records in connection with Agency business and operations; and

WHEREAS, LAVWMA is a joint powers agency and is subject to applicable federal, state, and local laws governing its records, including the California Public Records Act (Government Code §7920.000 et seq.); and

WHEREAS, Government Code §60201 et seq. establishes records retention and destruction requirements for special districts, and LAVWMA will use those provisions as guidance for its records retention practices; and

WHEREAS, staff has prepared a Records and Information Management Policy (“Policy”) and revised Records Retention Schedule based on applicable laws and minimum retention requirements for different types of records; and

WHEREAS, the Policy addresses the management, retention and destruction of Agency records, including trusted copies and duplicate copies; and

WHEREAS, on November 19, 2003 the LAVWMA Board of Directors (“Board”) adopted Resolution No. 03-04 approving retention periods for Agency records and authorizing destruction of records in accordance with the approved schedule; and

WHEREAS, the Board now desires to replace the 2003 schedule with an updated Records and Information Management Policy and Records Retention Schedule.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Livermore-Amador Valley Water Management Agency hereby adopts the Records and Information Management Policy, attached hereto as Exhibit A, and the Records Retention Schedule, attached hereto as Exhibit B, each incorporated herein by this reference; and

BE IT FURTHER RESOLVED that Resolution No. 03-04 is hereby rescinded and superseded; and

BE IT FUTHER RESOLVED that this Resolution shall take effect immediately upon adoption.

DULY AND REGULARLY ADOPTED by the Board of Directors of LAVWMA this 19th day of August, 2026, by the following vote:

AYES:

NOES:

ABSENT:

LIVERMORE AMADOR VALLEY WATER MANAGEMENT AGENCY

By: _____

Steven Dunbar, Chair

ATTEST:

By: _____

Levi Fuller, General Manager

Item No. 8 - Attachment B

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0101-00	<u>Office General Management</u>				
0101-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0101-03	Correspondence - Outside Of Agency			CY+2	State of California Guidelines; Administrative Record
0101-04	Policies	Vital Record. Includes Agency policies related to board business, general, operations, finance, purchasing, service, and personnel.	V	S+5	CCP 343; 4 years to commence action State of California Guidelines; Administrative Record recommends retaining for 5 years after superseded
0101-05	Procedures	Vital Record. Includes general administrative procedures of the Agency, not related to Standard Operating Procedures (SOPs).	V	S+5	CCP 343; 4 years to commence action State of California Guidelines; Administrative Record recommends retaining for 5 years after superseded
0101-06	Mission Statements		V	S+5	State of California Guidelines; Administrative Record recommends retaining for 5 years after superseded
0101-10	Agency Administration			CY+2	State of California Guidelines; Administrative Record
0102-00	<u>Office Reference</u>				
0102-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2	State of California Guidelines; Administrative Record
0102-03	Professional Associations / Organizations	Includes information on or from individual employee professional associations and organizations.		CY+2	State of California Guidelines; Administrative Record
0102-05	Newsletters / Publications - External	Newsletters and other publications received by the Agency. Potential historical information.		CY+2, AR	State of California Guidelines; Current year plus 2 years general recommendation for local government agency records Administrative Decision; Current year plus 2, review for historical content
0102-09	Historical Information / Documents	Includes newspaper clippings, photographs and other historical documents and materials. Historical records include materials valuable to inside and outside parties.	H	P	Administrative Decision: Maintain records designated as important to the history of the Agency permanently
0102-10	Special Events	Includes Agency hosted or attended events, such as employee recognition, receptions, ribbon cuttings and other events.	H	CY+5, AR	State of California Guidelines; Current year plus 2 years general recommendation for local government agency records Administrative Decision; Current year plus 5 to reference previous similar events, review for historical content

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0104-00	Records Management				
0104-01	General Information & Administration			CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0104-02	Certificates Of Destruction		V	P	State of California Guidelines; 2 years after superseded Administrative Decision: Permanent for destruction tracking purposes
0104-03	Directives & Procedures			S+7	CCP 343; 4 years to commence action State of California Guidelines; Administrative Record recommends retaining for 5 years after superseded. Administrative Decision: Retain records management directives and procedures for 7 years after superseded for reference to previous program aspects.
0104-04	Uniform Functional Filing System		V	S	Administrative Decision; Retain current version only. Destroy printed versions older than 30 days, due to potential updates
0104-05	Inactive Records Storage Information			S+2	State of California Guidelines; 2 years after superseded
0107-00	Safety				
0107-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0107-07	Safety Meetings	Includes agendas and meeting minutes for various safety workgroups such as Emergency Communications, Emergency Planning, and Safety Committee.		CY+7	29 CFR 1627.3(b); 1 year for training records GC 12946; 4 years after termination, general personnel records retention State of California Guidelines; 7 years after termination, no specific citation given. 2 years after termination for certificates and designations training. Administrative Decision: Maintain safety meeting materials for the current year plus 7 years to match training retention in Human Resources

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0202-00	<u>Planning</u>				
0202-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0202-02	Long Range Planning			S+2	State of California Guidelines; 2 years after master plan is superseded
0205-00	<u>Environmental Planning</u>				
0205-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0205-02	California Environmental Quality Act	Exemptions, Environmental impact report, mitigation monitoring, negative declaration, notices of completion and determination, comments, statements of overriding considerations. Preserve drafts, comments, correspondence, notices, studies, and other materials that may become part of the CEQA administrative record through final agency action		P	State of California Guidelines; Permanent recommendation for environmental related documents. Pub. Resources Code §§ 21167 and 21167.6.
0205-03	Notices Of Preparations	Includes public notices and legal publications required for posting. Preserve drafts, comments, correspondence, notices, studies, and other materials that may become part of the CEQA administrative record through final agency action		CY+4	CCP 343; Statutes of limitations, 4 years State of California Guidelines; Current year plus 4 years for public notices. Pub. Resources Code §§ 21167 and 21167.6.
0301-00	<u>Board</u>				
0301-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0301-03	Minutes	Official minutes of the Board of Directors	V	P	GC 60201(d)(3); Minutes of governing bodies, Permanent State of California Guidelines; Permanent
0301-04	Agenda Packets	Includes agenda face sheets, draft minutes, staff reports and attached materials, letters and memos and documents received, created and/or submitted to the Board for regular, special, workshop and other Brown Act Board meetings.		CY+75	State of California Guidelines; Maintain for the Current Year plus 2 years Administrative Decision: Maintain for the current year plus 20 years for reference purposes.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0301-06	Agenda Reference Items	Includes images and physical files of agenda face sheets, staff reports and attached materials, letters, memos, and working documents maintained by the departments for reference purposes.		CY+5	GC 60200; Duplicate records may be destroyed at any point before the total retention period State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 7 years for reference purposes.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0302-00	<u>Committees</u>				
0302-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0302-06	Committee Agenda Packets	Includes agenda face sheets, draft minutes, staff reports and attached materials, letters and memos and documents received, created and/or submitted to the Committee for regular, special, workshop and other Brown Act Committee meetings.		CY+20	State of California Guidelines; Maintain for the Current Year plus 2 years Administrative Decision: Current Year plus 20 years for reference purposes.
0303-00	<u>Reports, Studies & Surveys</u>				
0303-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0303-02	Agency Generated			CY+5, AR	State of California Guidelines; 2 years plus the current year for general studies and reports. Administrative Decision; Current year plus 5 years, review annually for relevance to current projects.
0303-03	Other Agency Generated			CY+5, AR	GC 60200; Duplicate records may be destroyed at any point before the total retention period Administrative Decision; Current year plus 5 years, review annually for relevance to current projects.
0401-00	<u>Accounting</u>				
0401-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+5, AR	Administrative Record; Maintain for the current year plus 5 years to support financial matters. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0401-02	Annual Audit Reports	Includes ACFRs, and other mandated reports.		P	State of California Guidelines; Permanent
0401-03	Financial Reports / Statements	Includes monthly general financial reports for internal use only. Does not include state or other agency mandated reports, which are kept PERMANENTLY.		AA+5	State of California Guidelines; 2 years after audit Administrative Decision: Retain financial reports and statements for 5 years after the annual audit for reference purposes.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0401-04	Invoices, Paid	Paid invoices, CalCard statements and payments, account analysis, receipts, AP postings, employee requests for reimbursements, and supporting vendor documents.		AA+8	GC 60201(12); Maintain Agency credit card statements and payments for 7 years after payment. State of California Guidelines; 4 years after audit Administrative Decision: Retain paid invoices for 8 years after the annual audit for reference purposes.
0401-05	Cash Receipts			AA+8	CCP 337; Statute of limitations, 4 years for action State of California Guidelines; 4 years after audit Administrative Decision: Retain cash receipts for 8 years after audit for simplicity of destruction.
0401-06	Journals / Ledgers	Detail maintained in LAVWMA's financial management software.		AA+8	State of California Guidelines; 2 years after audit Administrative Decision: Retain journals and ledgers for 8 years after the annual audit to support accounts payables and receivables.
0402-00	<u>Banking</u>				
0402-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0402-02	Canceled Receivable Checks	Electronic copy of the cancelled check is the official record.		AA+4	CCP 337; Statute of limitations, 4 years for action State of California Guidelines; 4 years after audit
0402-03	Bank Statements / Reconciliation	Includes statements, summaries for receipts, disbursements & reconciliation.		AA+8	26 CFR 31.6001-1(e)(2); 4 years State of California Guidelines; 5 years after audit Administrative Decision: Retain bank statements and reconciliations for 8 years after the annual audit to support accounts payables and receivables.
0402-05	Check Registers			AA+8	State of California Guidelines; After audit plus 2 years for warrant registers. Administrative Decision: Retain bank statements and reconciliations for 8 years after the annual audit to support accounts payables and receivables.
0402-06	Investments	Includes reports prepared for financials, summaries of transactions, inventory and earnings reports.		AA+8	CCP 337; Statutes of limitations, 4 years for action State of California Guidelines; Permanent Administrative Decision: Maintain investment statements and reports for 8 years after the annual audit to match the bank statement retention period.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0403-00	Insurance				
0403-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0403-02	Insurance Policies	Includes policy information pertaining to CSRMA insurance programs such as pooled liability, property, public official bond, workers' compensation, identity theft, etc.		P	CCP 337.2, 343, Statutes of limitations, 4 years 29 CFR 1920.1020; 30 years after termination for medical records. State of California Guidelines; Permanent for workers compensation insurance working files and for insurance policies. Maintain to support workers compensation claims and employee medical files.
0403-03	Certificates Of Insurance			P	State of California Guidelines; Permanent for insurance certificates filed separately from contracts/agreements, including insurance filed by licensees.
0403-04	Performance Bonds			AC+2	State of California Guidelines; 2 years after completion for performance bonds
0403-05	Workers Compensation Insurance	Insurance and plan documents.		P	29 CFR 1920.1020; 30 years after termination for medical records. State of California Guidelines; Permanent for workers compensation insurance working files. Maintain to support workers compensation claims and employee medical files.
0403-06	Maintenance Bonds / Certificate Of Deposit	For construction projects.		AC+10	CCP 337.5; 10 year statute of limitations State of California Guidelines; 10 years after completion for development bonds
0403-07	Payment Bonds	For construction projects.		AC+10	CCP 337.5; 10 year statute of limitations State of California Guidelines; 10 years after completion for development bonds
0403-08	Letters Of Credit	For construction projects.		AC+10	CCP 337.5; 10 year statute of limitations State of California Guidelines; 10 years after completion for development bonds
0403-09	Insurance Claims	Includes information pertaining to active / inactive damage claims involving Agency employees, personal and damage claims against the Agency, claim subrogation and recovery.		AC+6	29 USC 1113; 6 years after date of last action, or 3 years after plaintiff had knowledge of breach or violation, whichever comes first. State of California Guideline; 5 years after settlement or closure

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0404-00	<u>Payroll</u>				
0404-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group. Only applies to records maintained as official LAVWMA records.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0404-02	Time Sheets	Signed employee timesheets for audit reports. Electronic record. Only applies to records maintained as official LAVWMA records		AA+6	29 CFR 516.2; Maintain 29 CFR 516.6; 2 years R&T 19530; 3 years after tax return due LC 1174; 2 years after pay period 26 CFR 31.6001-1; 4 years after tax return due 29 USC 255(a); 2 to 3 years statute of limitations for minimum wages State of California Guidelines; 6 years after audit
0404-03	CalPERS Pension Reporting	Includes payroll processing CalPERS reports. Only applies to records maintained as official LAVWMA records		AA+7	GC 60201d(12); 7 years after payment 29 USC 436; 5 years 26 CFR 31.6001; 4 years after tax return is filed R&T 19530; 3 years after tax return is filed R&T 19704; 6 year statute of limitations 29 CFR 516.2-6; Maintain at least 3 years State of California Guidelines; 4 years after audit
0404-04	Earnings / Withholding Reports (Taxes)	Forms 1096, 1099, W-4 and W-2. Only applies to records maintained as official LAVWMA records		AA+7	GC 60201d(12); 7 years after payment 29 USC 436; 5 years 26 CFR 31.6001; 4 years after tax return is filed R&T 19530; 3 years after tax return is filed R&T 19704; 6 year statute of limitations 29 CFR 516.2-6; Maintain at least 3 years State of California Guidelines; 4 years after audit
0404-05	Payroll Registers	Only applies to records maintained as official LAVWMA records		P	GC 60201d(12); 7 years after payment 29 USC 436; 5 years 26 CFR 31.6001; 4 years after tax return is filed R&T 19530; 3 years after tax return is filed R&T 19704; 6 year statute of limitations 29 CFR 516.2-6; Maintain at least 3 years State of California Guidelines; Permanent for payroll registers

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis [®]
0405-00	<u>Budget</u>				
0405-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+5, AR	Administrative Record; Maintain for the current year plus 5 years to support financial matters. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0405-02	Annual Budget	Operating budget.		P	GC 53901; Budgets copy must be filed with the County State of California Guidelines; Permanent. Permanent refers to one final copy of the approved budget. Working copies can be destroyed after use.
0405-03	Budget Adjustments	Detail maintained in Eden / Munis.		AA+5	State of California Guidelines; 2 years after audit Administrative Decision: retain budget adjustments for 5 years after the annual audit for reference purposes.
0405-04	Budget Working Papers	Includes proposed budgets, and all work papers leading up to final annual budget.		AA+5	State of California Guidelines; 2 years after audit Administrative Decision: retain budget working papers for 5 years after the annual audit for reference purposes.
0406-00	<u>Revenue</u>				
0406-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0406-02	Rates & Service Charges	Includes rate and fee studies.		S+2	State of California Guidelines; 2 years after superseded
0406-04	Reimbursement	Reimbursement to Agency for services from other agencies. Detail maintained in Eden/Munis.		AA+8	GC 60201(12); Maintain Agency credit card statements and payments for 7 years after payment. CCP 337; Statute of limitations of 4 years Administrative Decision: Retain reimbursements for 8 years after the annual audit to support receipts.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0408-00	<u>Debt</u>				
0408-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0408-02	Official Debt Offering Documents	Includes official statements, arbitrage, annual statements, bond disclosure, bond pay-offs, bond covenants and cash / surety bonds.		AC+10	CCP 337.5; Statutes of limitations, 10 years after expiration FC 30210; Maintain State of California Guidelines; 10 years after closure/expiration, and Permanent for bond issues
0408-03	Mandated Annual Reporting (Continuing Disclosure Documents)			AC+10	CCP 337.5; Statutes of limitations FC 30210; Maintain State of California Guidelines; 10 years after closure/expiration
0408-04	Bond Issues			P	CCP 337.5; Statutes of limitations, 10 years after expiration FC 30210; Maintain State of California Guidelines; 10 years after closure/expiration, and Permanent for bond issues
0506-00	<u>Personnel Education And Training</u>				
0506-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group. Only applies to records maintained as official LAVWMA records		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0506-02	Seminars, Courses & Professional Development	Materials for mandatory training (sexual harassment prevention, workplace violence prevention, and diversity in the workplace); and professional development training (skills training) courses. Includes program information and applications for tuition reimbursement and certificate reimbursement programs. Only applies to records maintained as official LAVWMA records		CY+7	29 CFR 1627.3(b); 1 year for training records GC 12946(a); 4 years after termination, general personnel records retention State of California Guidelines; 7 years after termination, no specific citation given. 2 years after termination for certificates and designations training.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0601-00	<u>Purchasing</u>				
0601-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0601-02	Bids, RFQs & RFPs - General	Includes bids, RFQs & RFPs, not related to Development or Building Improvements. Successful bids, RFQs and RFPs: Unsuccessful bids, RFQs and RFPs:		AC+5 CY+2	GC 60201(d)(11); 2 years for unaccepted bids or proposals CCP 337; Statute of limitations State of California Guidelines; 5 years after audit for successful bids, Current year plus 2 for unsuccessful bids Administrative Decision: 5 years after completion of project associated with the successful bid. Unsuccessful bids follow the State requirement.
0601-03	Purchase Orders	Original purchase orders.		AA+4	CCP 337; Statute of limitations State of California Guidelines; 4 years after audit
0601-05	Requisitions	Completed forms for orders.		CY+2	State of California Guidelines; Current year plus 2
0602-00	<u>Contracting</u>				
0602-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0602-02	Consulting Services	Includes any working documents related to development or building improvements, and associated work.		AC+10	CCP 337.1(a), SOL 4 years after completion of contract CCP 337.15, SOL 10 years after completion for development improvements and associated work. State of California Guidelines; 10 years after project completion for capital improvement projects

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis °
0602-03	Bids, RFQs & RFPs - Development / Improvements / Construction	Includes successful bids, RFQs & RFPs for Development or Building Improvement projects. Successful bids, RFQs and RFPs: Unsuccessful bids, RFQs and RFPs:		AC+10 CY+2	GC 60201(d)(11); 2 years for unaccepted bids or proposals CCP 337.1(a), SOL 4 years after completion of contract CCP 337.15, SOL 10 years after completion for development improvements and associated work. State of California Guidelines; 5 years after audit, successful, Current year plus 2, unsuccessful Administrative Decision: 10 years after completion of project associated with the successful bid to match the statute of limitations. Unsuccessful bids follow the State requirement.
0602-04	Contract Employees	Includes any working documents related to development or building improvements, and associated work.		AC+10	CCP 337.1(a), SOL 4 years after completion of contract CCP 337.15, SOL 10 years after completion for development improvements and associated work. State of California Guidelines; 10 years after project completion for capital improvement projects, permanent for CIP contracts.
0603-00	Equipment And Furniture				
0603-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0603-02	Inventory			AA+4	State of California Guidelines; 4 years after audit for fixed asset inventories.
0603-03	Vehicles & Equipment	Maintenance, repairs, and parts data and records.		L+4	CCP 343; 4 years for action State of California Guidelines state life of the vehicle plus 2 years for fuel, maintenance and repair records of vehicles. State does not reference any citations.
0603-05	Surplus Property			AA+4	CCP 337; Statute of limitations of 4 years State of California Guidelines; 4 years after audit
0701-00	Legislative				
0701-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0701-02	Ordinances		V	P	GC 60201(d)(2); Permanent for decisions of the Agency State of California Guidelines; Permanent
0701-03	Resolutions		V	P	GC 60201(d)(2); Permanent for decisions of the Agency State of California Guidelines; Permanent
0701-04	State Legislation	Correspondence and information in support or opposition to legislation.		CY+2	State of California Guidelines; Current year plus 2 years general recommendation for local government agency records
0701-05	Ordinance Work Papers			CY+2	State of California Guidelines; Current year plus 2 years general recommendation for local government agency records
0701-06	Resolution Work Papers			CY+2	State of California Guidelines; Current year plus 2 years general recommendation for local government agency records

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0702-00	<u>Attorney</u>				
0702-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0702-02	Legal Opinions	CONFIDENTIAL. Includes formal written opinions from legal counsel. Opinions may be superseded due to changes in statutes or new case law.	C	S+2	State of California Guidelines: 2 years after superseded
0703-00	<u>General Legal</u>				
0702-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0703-02	Deeds / Quitclaim Deeds		V	P	GC 60201(d)(8); Permanent for land and property related documents 24 CFR 1710; Permanent
0703-03	Easements / Right Of Way / Right Of Entry		V	P	GC 60201(d)(8); Permanent for land and property related documents 24 CFR 1710; Permanent
0703-04	Agreements / Contracts			AC+5	CCP 337.2; Statutes of limitations CCP 343; Statutes of limitations 48 CFR 4.703; 3 years after final payment 48 CFR 4.705-1; 4 years after completion for accounting, payroll, purchasing records, et. al.
0703-05	Claims By / Against The Agency			AC+6	42 USC 1983; Definitions GC 25105.5; 5 years after closure/completion 29 USC 1113; 6 years after date of last action, or 3 years after plaintiff had knowledge of breach or violation, whichever comes first. GC 910 - 913; 6 months to 1 year after event occurs. State of California Guideline; 5 years after settlement or closure
0703-06	Assessment Agencies			P	GC 60201(d)(8); Permanent for land and property related documents State of California Guidelines; Permanent

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0703-07	Litigation	General cases: High profile cases including significant impacts on the Agency (major tort, employment, etc.), broad reach, rates/fees/charges, wrongful death, possible publicity due to nature of a matter and other significant cases: Documents include all materials supporting the case and leading up to the court decision.		AC+7 P	State of California Guidelines; 7 years after closure for case records; maintain high profile cases permanently.
0703-08	Annexations / Detachments		V	P	GC 60201(d)(8); Permanent for land and property related documents 24 CFR 1710; Permanent State of California Guidelines; Permanent
0703-09	Affidavits Of Publication	Includes public notices and legal publications for council, boards, commissions and committee meetings, and other legal publication requirements.		CY+4	CCP 343, 349; Statutes of limitations State of California Guidelines; Maintain legal and meeting notices for the current year plus 4 years.
0703-10	Public Records Requests	Granted and denied requests.		AC+2	GC 60201(d)(5); Until request is granted or 2 years after request has been denied in writing Administrative Decision: Maintain all public records requests for 2 years after completion for reference.
0703-12	Service, Supply & Equipment Agreements	Vendors, product acquisitions, services, professional services and consultants and all other general Agency agreements.		AC+5	CCP 337.2; Statutes of limitations CCP 343; Statutes of limitations 48 CFR 4.703; 3 years after final payment 48 CFR 4.705-1; 4 years after completion for accounting, payroll, purchasing records, et. al.
0703-13	CIP / Infrastructure Agreements	Capital improvement, development and other infrastructure or labor related agreements.		P	GC 60201(d)(8); Permanent for land and property related documents CCP337, 337.1(a), 337.15; Statutes of limitations 48 CFR 4.703; 3 years after final payment 48 CFR 4.705-1; 4 years after completion for accounting, payroll, purchasing records, et. al. H&S 19850; Life of Building, with exceptions.
0703-17	Property Appraisals			AC+2	State of California Guidelines; 2 years for appraisals

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0704-00	<u>Agency Correspondence</u>				
0704-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0704-02	Federal Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-03	State Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-04	Regional Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-05	County Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-06	Local Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-07	Joint Powers Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-08	City Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.

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0704-09	Water Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-10	Sanitation Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0704-11	Membership Agencies	Correspondence & reports not attached to contracts, agreements or specific projects.		CY+2, AR	State of California Guidelines; Administrative Record Administrative Decision: Maintain for the current year plus 2 years, review for relevance to current subject matter or projects.
0705-00	Grants Program				
0705-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0705-02	Federal Grants	Refer to grant application close-out procedure. Retention may vary depending upon grant details.		AFP+5*	21 CFR 1403.36; 3 years after last payment 21 CFR 1403.42; 3 years after last payment, unless litigation, then 3 years after claim is filed/settled. 24 CFR 85.42; Grants & co-operative agreements, 3 years after submission of last expenditure report OMB Cir. A-110, (C)(53); 3 years after submission of final expenditure report or final disposition 29 CFR 97.42; grants covered by a consolidated action plan must be kept for 5 years. State of California Guidelines; 5 years after grant closure. * Refer to grant application close-out procedures for specific retention, if any. If no retention exists, follow retention listed here.

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0705-03	State Grants	Refer to grant application close-out procedure. Retention may vary depending upon grant details.		AFP+5*	21 CFR 1403.36; 3 years after last payment 21 CFR 1403.42; 3 years after last payment, unless litigation, then 3 years after claim is filed/settled. 24 CFR 85.42; Grants & co-operative agreements, 3 years after submission of last expenditure report OMB Cir. A-110, (C)(53); 3 years after submission of final expenditure report or final disposition 29 CFR 97.42; grants covered by a consolidated action plan must be kept for 5 years. State of California Guidelines; 5 years after grant closure. * Refer to grant application close-out procedures for specific retention, if any. If no retention exists, follow retention listed here.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0706-00	<u>Elections / Fair Political Practices Committee</u>				
0706-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0706-02	Conflict Of Interest	Includes FPPC form 700 - Statement of Economic Interest for elected and appointed officials.		AC+7	GC 81009(e); 7 years after completion requirement for originals GC 81009(f); 4 years after completion requirement for copies
0801-00	<u>General Engineering</u>				
0801-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group. DSRSD will maintain official records for LAVWMA projects that DSRSD manages. LAVWMA will maintain official CIP records for all others.		p	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0801-03	Standard Specifications	DSRSD will maintain official records for LAVWMA projects that DSRSD manages. LAVWMA will maintain official CIP records for all others.		P	CCP 337.15, Statute of limitations 10 years after completion for development improvements and associated work. State of California Guidelines; Completion of project plus 10 years. Administrative Decision: Permanent for maintenance purposes
0801-04	Special Projects	DSRSD will maintain official records for LAVWMA projects that DSRSD manages. LAVWMA will maintain official CIP records for all others.		P	CCP 337.15, Statute of limitations 10 years after completion for development improvements and associated work. State of California Guidelines; Completion of project plus 10 years.
0802-00	<u>Capital Improvement Projects</u>				
0802-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group. DSRSD will maintain official records for LAVWMA projects that DSRSD manages. LAVWMA will maintain official CIP records for all others.		P	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0802-02	CIP Projects	Includes construction and conformed or record drawing documents relating to planning, design, construction, conversion or modification of local government-owned facilities, structures & systems. Non-conformed and partial drawings are considered transitory and can be disposed of after the conformed or record drawings are completed. DSRSD will maintain official records for LAVWMA projects that DSRSD manages. LAVWMA will maintain official CIP records for all others.		P	CCP 337.15, Statute of limitations 10 years after completion for development improvements and associated work. State of California Guidelines; Permanent
0805-00	Permits				
0805-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		P	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0805-04	Certificates Of Capacity Rights	Permits to connect to the Agency's sewer and water systems.		P	GC 60201(d)(8); Permanent for land and property related documents 40 CFR 122.28; Maintain 40 CFR 122.41; 5 years after completion 40 CFR 141.33; Maximum 10 years after completion 40 CFR 141.91; 12 years after testing State of California Guidelines; Permanent
0805-05	Agency Facility Construction Permits	Includes water and sewer construction permits for developers.		P	GC 60201(d)(8); Permanent for land and property related documents 40 CFR 122.28; Maintain 40 CFR 122.41; 5 years after completion 40 CFR 141.33; Maximum 10 years after completion 40 CFR 141.91; 12 years after testing State of California Guidelines; Permanent
0811-00	Inspection				
0811-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
0811-02	Inspection Log Books	Logs, registers or similar records listing permits, certificates of occupancy issued; may include inspection, building activity, daily, plan check and utilities.		P	State of California Guidelines; Current year plus 5 years

Item No. 8 - Attachment B

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
0811-05	Other Inspections	Includes correspondence, fees, appeal requests and inspection reports.		P	State of California Guidelines; Current year plus 2 years for building inspections.
1001-00	<u>Water System</u>				
1001-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
1001-02	Hydraulic Modeling			P	18 CFR 125.3; 5 years for internal statistical reports 40 CFR 141.91; 12 years after completion State of California Guidelines; Permanent for hydrography reports.
1001-04	Test / Logs / Reports	Compliance documentation including strip charts, sampling data, analysis, reports, surveys, documents, evaluation, schedules, valves, etc.		P	40 CFR 141.91; 12 years after completion for quality tests, 5 years after completion for bacterial tests, 10 years after completion for chemical analysis of system. State of California Guidelines; Permanent for hydrograph records
1001-05	System Maintenance			CY+3	40 CFR 141.33; 3 years after completion for corrections to water system violations
1001-06	Infrastructure			P	State of California Guidelines; Locations and connection records are permanent
1001-08	Water System O & M Manuals			ACT	GC 60200; Duplicate records may be destroyed at any point before the total retention period State of California Guidelines; Administrative Record
1001-09	Cathodic Protection Surveys			CY+10	40 CFR 141.33; Maximum 10 years after completion relating to sanitary surveys
1001-10	Backflow Test & Maintenance Reports			CY+3	17 CCR 7605; 3 years for backflow testing and maintenance reports
1001-11	Water / Sewer Service Calls	Includes work orders, entry cards, manholes, service to property owners, inspection, repairs, cleaning, reports, complaints.		CY+2	State of California Guidelines; Current Year plus 2 years for maintenance projects.
1001-12	Water Quality Control	Compliance documentation including sampling data, analysis, reports, surveys, documents, evaluation, schedules, valves, etc.		CY+12	40 CFR 141.91; 12 years after completion State of California Guidelines; Current year plus 12 for water quality compliance documents
1201-00	<u>Pipeline</u>				
1201-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		P	Administrative Record; Maintain for the current year plus 2 years to follow the State minimum guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
1201-02	Hydraulic Modeling			P	State of California Guidelines; Permanent for hydrograph reports and daily flow of streams.

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
1201-04	Testing	Does not include compliance documents.		P	State of California Guidelines; Current year plus 2 years for maintenance and operations records.
1201-07	System Maintenance			CY+2	State of California Guidelines; Current year plus 2 years for maintenance and operations records.
1302-00	Government Reports				
1302-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
1302-02	RWQCB	Includes audits, correspondence and general information.		CY+20	40 CFR 122.41; 3 years for reports for permit State of California Guidelines; Current year plus 5 for discharge monitoring
1303-00	LAVWMA Operations And Maintenance				
1303-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		CY+2, AR	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
1303-02	EBDA Report	East Bay Dischargers Authority		CY+20	40 CFR 61.54; 2 years for sludge sampling 40 CFR 60.153; 2 years for treatment plant monitoring 40CFR 503.27; 5 years for sewage sludge monitoring 40 CFR 122.21; 3 years from application signature date for permit supporting data 40 CFR 122.41; 5 years for sewage sludge use & disposal activities State of California Guidelines; Current year plus 5 years
1303-03	Pump Station Report			CY+20	40 CFR 61.54; 2 years for sludge sampling 40 CFR 60.153; 2 years for treatment plant monitoring 40 CFR 122.21; 3 years from application signature date for permit supporting data
1303-04	Langelier Report			CY+20	40 CFR 61.54; 2 years for sludge sampling 40 CFR 60.153; 2 years for treatment plant monitoring 40 CFR 122.21; 3 years from application signature date for permit supporting data

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
1303-05	Pump Station Daily Meter Logs	Compliance documentation including sampling data, analysis, reports, surveys, documents, evaluation, schedules, valves, etc.		CY+20	40 CFR 61.54; 2 years for sludge sampling 40 CFR 60.153; 2 years for treatment plant monitoring 40CFR 503.27; 5 years for sewage sludge monitoring 40 CFR 122.21; 3 years from application signature date for permit supporting data 40 CFR 122.41; 5 years for sewage sludge use & disposal activities State of California Guidelines; Current year plus 5 years
1303-06	Operators Inspection Check List	Compliance documentation including sampling data, analysis, reports, surveys, documents, evaluation, schedules, valves, etc.		CY+20	40 CFR 61.54; 2 years for sludge sampling 40 CFR 60.153; 2 years for treatment plant monitoring 40CFR 503.27; 5 years for sewage sludge monitoring 40 CFR 122.21; 3 years from application signature date for permit supporting data 40 CFR 122.41; 5 years for sewage sludge use & disposal activities State of California Guidelines; Current year plus 5 years
1303-07	Chlorine Analysis			CY+5	40 CFR 61.54; 2 years for sludge sampling 40 CFR 60.153; 2 years for treatment plant monitoring 40CFR 503.27; 5 years for sewage sludge monitoring 40 CFR 122.21; 3 years from application signature date for permit supporting data 40 CFR 122.41; 5 years for sewage sludge use & disposal activities State of California Guidelines; Current year plus 5 years
1303-08	Cathodic Protection			CY+20	40 CFR 61.54; 2 years for sludge sampling 40 CFR 60.153; 2 years for treatment plant monitoring 40CFR 503.27; 5 years for sewage sludge monitoring 40 CFR 122.21; 3 years from application signature date for permit supporting data 40 CFR 122.41; 5 years for sewage sludge use & disposal activities State of California Guidelines; Current year plus 5 years
1303-10	O & M Reports			CY+2	State of California Guidelines; Current year plus 2 years
1304-00	<u>Records Drawings / Photos</u>				

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Series Code	Series Name	Description	Special Attributes	Retention Period	Citations & Legal Basis ®
1304-01	General Information & Administration	Includes general subject information, reports and reference documents relating to the record group, but not associated with a specific record series already in the group.		P	Administrative Record; Maintain for the current year plus 2 years to follow the minimum State guidelines. Review annually for relevance to current subject matter or projects, inclusion in an associated record series, or creation of a new record series.
1304-02	Pumping Station Site			P	State of California Guidelines; Permanent for field notes, maps and locations of equipment.
1304-03	Dechlorination Station Pleasanton			P	State of California Guidelines; Permanent for field notes, maps and locations of equipment.
1304-04	Dechlorination Station San Leandro			P	State of California Guidelines; Permanent for field notes, maps and locations of equipment.
1304-05	Export Pipeline			P	State of California Guidelines; Permanent for field notes, maps and locations of equipment.
1304-06	Livermore Trunkline			P	State of California Guidelines; Permanent for field notes, maps and locations of equipment.

LIVERMORE-AMADOR VALLEY WATER MANAGEMENT AGENCY

RESOLUTION NO. 03-04

A RESOLUTION APPROVING RETENTION PERIODS FOR VARIOUS AGENCY RECORDS AND AUTHORIZING THE AGENCY MANAGER TO DESTROY CERTAIN PUBLIC RECORDS IN ACCORDANCE THEREWITH

WHEREAS, Government Code section 34090 authorizes legislative bodies to adopt records retention schedules to establish retention periods for various types of public records, and;

WHEREAS, the Livermore-Amador Valley Water Management Agency ("LAVWMA") Board of Directors has reviewed a proposed schedule for retention and destruction of certain categories of records, and;

WHEREAS, the Board finds that destruction or disposition of the categories of records described in said schedule will not adversely affect any interest of the Agency or of the public, and;

WHEREAS, the Board finds that the schedule contemplates the maintenance of a list of records destroyed or disposed of, by category, and describes each category in a way that reasonably identifies the information contained in the records in that category, and;

WHEREAS, the Board therefore desires to approve said retention schedule and authorize the destruction of records in accordance with said schedule.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF LAVWMA as follows:

1. Schedule of records retention document entitled, "Livermore-Amador Valley Water Management Agency Retention Periods," a copy of which is attached hereto, labeled "Exhibit A," is hereby adopted, which schedule classifies the Agency's public records by category, and establishes a standard protocol for their destruction or disposition.
2. The General Manager is hereby authorized to destroy Agency records in accordance with such schedule.
3. Notwithstanding the schedule of records retention adopted hereby, the General Manager may not destroy or dispose of any records the destruction or disposal of which is prohibited by any applicable provision of law enacted after this Resolution becomes effective.
4. This Resolution shall become effective immediately upon its passage and adoption.

5. The General Manager is hereby directed and authorized from time to time to make and implement such changes in the attached, "Livermore-Amador Valley Water Management Agency Retention Periods" as he or she may determine, as approved by General Counsel, to be required by the law then applicable.

PASSED AND ADOPTED THIS 19th day of November, 2003, by at least a two-thirds vote, to wit:

Ayes: 4

Noes: 0

Abstain: 0

Absent: 2

Board of Directors

LIVERMORE-AMADOR VALLEY WATER
MANAGEMENT AGENCY



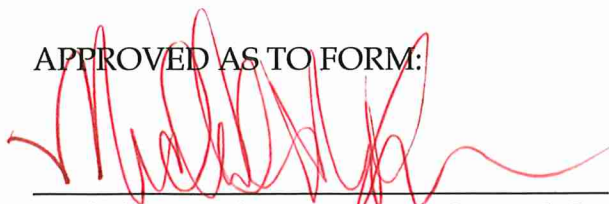
Tom Ford, Chair

ATTEST:



Vivian W. Housen, General Manager

APPROVED AS TO FORM:



Michelle Marchetta Kenyon, General Counsel

EXHIBIT A

Livermore-Amador Valley Water Management Agency
LAVWMA Retention Periods

For action by the Board of Directors
November 19, 2003

Title	Function/Group/ Series Number	Retention Period
OFFICE GENERAL MANAGEMENT	0101	
POLICIES	04	CY+10
PROCEDURES	05	CY+10
MISSION STATEMENTS	06	CY+10
OFFICE REFERENCE	0102	
PUBLIC RELATIONS	06	CY+2
SPECIAL EVENTS	10	CY+2
PERSONNEL ISSUES	11	CY+2
RECORDS MANAGEMENT	0104	
CERTIFICATES OF DESTRUCTION	02	P
DIRECTIVES & PROCEDURES	03	CY+2
UNIFORM FUNCTIONAL FILING SYSTEM	04	CY+2
SAFETY	0107	
CONTRACTOR SAFETY MANUALS	06	AE+2
MEETINGS	07	CY+2
MSDS DOCUMENTATION	08	CY+2
PLANNING	0202	
LONG RANGE PLANNING	02	CY+2
ENVIRONMENTAL PLANNING	0205	
CALIFORNIA ENVIRONMENTAL QUALITY ACT	02	P
NOTICE OF PREPARATIONS	03	P
BOARD	0301	
AGENDA & STAFF REPORTS	02	CY+50
MINUTES	03	P
WORKSHOPS	04	CY+50
COMMITTEES	0302	
MANAGEMENT COMMITTEE	02	CY+10
TECHNICAL ADVISORY COMMITTEE	04	CY+10
REPORTS, STUDIES AND SURVEYS	0303	
AGENCY GENERATED	02	CY+5
OTHER AGENCY GENERATED	03	CY+5
ACCOUNTING	0401	
ANNUAL AUDIT REPORTS	02	P
FINANCIAL REPORTS/STATEMENTS	03	CY+5
INVOICES, PAID	04	CY+5
CASH RECEIPTS	05	CY+10
JOURNALS/LEDGERS	06	CY+10

AA - After Audit AE - After Expiration CY - Current Year C - Current NA - Not Applicable

P - Permanent R - Review Y - Years AC - After Completion N - None

PETTY CASH	07	CY+5
Title	Function/Group/ Series Number	Retention Period
BUDGET	0402	
ANNUAL BUDGETS	02	P
BUDGET ADJUSTMENTS	03	P
BANKING	0403	
CHECKS, CANCELED	02	CY+5
BANK STATEMENTS/RECONCILIATION	03	CY+5
ACCOUNT ANALYSIS	04	CY+5
CHECK REGISTERS	05	CY+5
BANK OF NEW YORK AGREEMENTS/GENERAL CORRESPONDENCE	06	CY+5
FINANCING	0404	
METHODS		CY+2
PLAN OF FINANCE	03	AC+35
CORRESPONDENCE	04	AC+35
BOND RATING	05	AC+35
BOND ISSUANCE	06	AC+35
REINVESTMENT OF FUNDS	07	AC+35
INSURANCE	0405	
POLICIES	02	P
CERTIFICATES OF INSURANCE	03	AC+10
PERFORMANCE BONDS	04	AC+10
MAINTENANCE BONDS/CERTIFICATE OF DEPOSIT	06	AC+10
PAYMENT BONDS	07	AC+10
LETTERS OF CREDIT	08	AC+10
RISK MANAGEMENT	09	AC+10
REVENUE	0406	
REIMBURSEMENT	04	CY+20
PURCHASING	0601	
BIDS	02	CY+2
PURCHASE ORDERS	03	AC+2
WARRANT REQUESTS	04	CY+4
REQUISITIONS	05	CY+5
CONTRACTING	0602	
CONSULTING SERVICES	02	AC+15
BIDS	03	CY+2
CONTRACT EMPLOYEES	04	CY+5
EQUIPMENT AND FURNITURE	0603	
INVENTORY	02	CY+2
OFFICE EQUIPMENT	03	CY+2
VEHICLES	04	CY+2
SURPLUS PROPERTY	05	CY+2

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P - Permanent R - Review Y - Years AC - After Completion N - None

Title	Function/Group/ Series Number	Retention Period
LEGISLATIVE	0701	
ORDINANCES	02	P
RESOLUTIONS	03	P
ORDINANCE WORK PAPERS	05	CY+2
RESOLUTION WORK PAPERS	06	CY+2
COUNTY LEGISLATION	07	CY+2
STATE LEGISLATION	08	CY+2
FEDERAL LEGISLATION	09	CY+2
ATTORNEY	0702	
LEGAL OPINIONS	02	CY+10
GENERAL LEGAL	0703	
DEEDS/QUITCLAIM DEEDS	02	P
EASEMENTS	03	P
AGREEMENTS/CONTRACTS	04	AC+10
CLAIMS BY/AGAINST THE AGENCY	05	AC+20
LITIGATION	07	AC+5
ANNEXATIONS/DETACHMENTS	08	P
AFFIDAVITS OF PUBLICATION	09	CY+10
PERSONNEL MATTERS		CY+10
AGENCY CORRESPONDENCE	0704	
FEDERAL AGENCIES	02	CY+10
STATE AGENCIES	03	CY+10
REGIONAL AGENCIES	04	CY+10
COUNTY AGENCIES	05	CY+10
LOCAL AGENCIES	06	CY+10
JOINT POWERS AGENCIES	07	CY+10
CITY AGENCIES	08	CY+10
WATER AGENCIES	09	CY+10
SANITATION AGENCIES	10	CY+10
MEMBERSHIP AGENCIES	11	CY+10
GRANTS PROGRAM	0705	
FEDERAL GRANTS	02	AE+4
STATE GRANTS	03	AE+4
ELECTIONS/FAIR POLITICAL PRACTICES COMMITTEE	0706	
CONFLICT OF INTEREST (E.G. STATEMENTS OF ECONOMIC INTEREST)	02	CY+7
GENERAL ENGINEERING	0801	
DOCUMENTATION (EXCEPT LEGAL/PERMITS)	02	AC+25
STANDARD SPECIFICATIONS	03	P
CAPITAL IMPROVEMENT PROJECTS	0802	
DOCUMENTATION (EXCEPT LEGAL/PERMITS)	02	AC+25

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PERMIT	0805	
NPDES PERMITS	04	P
NPDES SELF MONITORING REPORTS	05	CY+2 (GW RECOMMENDS P BECAUSE WATER CODE SECTION 13267(b) PERMITS BOARD TO REQUEST ANY MONITORING REPORTS)
Title	Function/Group/ Series Number	Retention Period
CALTRANS GENERAL O & M PERMIT	06	AE+2
CITY OF PLEASANTON	07	AE+2
ALAMEDA COUNTY PUBLIC WORKS	08	AE+2
MAPPING	0809	
FACILITY MAPS	02	P
BASE MAPS	03	P
EASEMENTS	04	P
INSPECTION	0811	
INSPECTORS LOG BOOKS	02	CY+10
OTHER INSPECTIONS	05	CY+10
AGENCY PROPERTY	0901	
PROPERTY ACQUISITION/TRANSACTIONS	02	P
RIGHT OF WAY/EASEMENT ACQUISITION	03	P
SURPLUS PROPERTY	04	P
PROPERTY MANAGEMENT	05	AE+5
PIPELINE	1201	
HYDRAULIC MODELING	02	CY+25
TESTING	04	CY+25
SYSTEM MAINTENANCE	07	CY+25
CAPACITY	09	P
GOVERNMENT REPORTS	1302	
RWQCB	02	CY+10 (GW RECOMMENDS P)
LAVWMA OPERATIONS AND MAINTENANCE	1303	
EBDA REPORT	02	CY+5
PUMP STATION REPORT	03	CY+5
LANGELIER REPORT	04	CY+5
PUMP STATION DAILY METER LOGS	05	CY+10
OPERATORS INSPECTION CHECK LIST	06	CY+10
CHLORINE ANALYSIS	07	CY+10
CATHODIC PROTECTION	08	CY+10
O & M REPORTS	10	CY+5
RWQCB LAND LOGS	11	CY+5

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P - Permanent R - Review Y - Years AC - After Completion N - None

Item No. 8 - Attachment D

CONCURRENT AGENCY PROJECTS	12	P
RECORDS DRAWINGS/PHOTOS	1304	
PUMPING STATION SITE	02	P
DECHLORINATION STATION – PLEASANTON	03	P
DECHLORINATION STATION – SAN LEANDRO	04	P
EXPORT PIPELINE	05	P
LIVERMORE TRUNKLINE	06	P
LABORATORY	1305	
REPORTS	04	CY+10

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P - Permanent R - Review Y - Years AC - After Completion N - None



AGENCY-WIDE RECORDS AND INFORMATION MANAGEMENT PROGRAM POLICY

Adopted by the Board of Directors on (Date)
Resolution No. (Number)

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1. PURPOSE

This Records and Information Management (RIM) Program Policy (Policy) establishes comprehensive and uniform methods for the cost effective and efficient management of the Livermore-Amador Valley Water Management Agency's (Agency) public records (including creation, utilization, maintenance, security, retention, storage, preservation, and destruction), in accordance with legal requirements and professional standards.

2. SCOPE

This Policy is established by the Agency in accordance with all relevant federal, state, and local laws, and contractual requirements, including the California Public Records Act (Government Code §7920.000 *et seq.*). Additionally, where relevant to the needs of the Agency's management of records, the Agency has incorporated provisions from professional standards and guidelines. All physical hardcopy or electronic documents, sound, or video works created by employees while executing the Agency's business are considered records under this policy regardless of whether they are managed in a formal process by the Agency or kept by an employee or their work unit for reference or any other purpose.

This Policy and the attached Agency Records Retention Schedule address all Agency records, regardless of media and storage.

3. AUTHORITIES

The legal authorities and professional guidelines applicable to this Policy include, but are not limited to, the following:

Federal and State Law: Numerous Federal and State laws related to minimum record retention requirements and statutes of limitations apply to different types of records. The Records Retention Schedule identifies the basis for the applicable retention period, where applicable.

Government Code §60201 *et seq.*: Government Code §60201, *et seq.*, sets forth requirements for the retention and destruction of specific public records for special districts. As a joint powers agency, Agency will use these provisions as guidance for its records retention practices. This Policy establishes the procedures consistent with the provisions within the state law for the destruction of original public records which have been retained for at least the minimum retention period and are no longer required by the Agency for business or historical purposes. The Policy also addresses the destruction of records which have been replaced by Trusted Copies (GC §60203) and the destruction of Duplicate Copies (GC §60200).

Consistent with Government Code §60201(d), the Agency may not destroy or dispose of any record that is any of the following:

1. Relates to formation, change of organization, or reorganization of the Agency.
2. An ordinance adopted by the Agency. However, an ordinance that has been repealed or is otherwise invalid or unenforceable may be destroyed or disposed of pursuant to this section five years after it was repealed or became invalid or unenforceable.
3. Minutes of any meeting of the legislative body of the Agency.
4. Relates to any pending claim or litigation or any settlement or other disposition of litigation within the past two years.
5. Is the subject of any pending request made pursuant to the California Public Records Act (Government Code §7920.000 *et seq.*), whether or not the Agency maintains that the record is exempt from disclosure, until the request has been granted or two years have

elapsed since the Agency provided written notice to the requester that the request has been denied.

6. Relates to any pending construction that the Agency has not accepted or as to which a stop notice claim legally may be presented.
7. Relates to any non-discharged debt of the Agency.
8. Relates to the title to real property in which the Agency has an interest.
9. Relates to any non-discharged contract to which the Agency is a party.
10. Has not fulfilled the administrative, fiscal, or legal purpose for which it was created or received.
11. Is an unaccepted bid or proposal, which is less than two years old, for the construction or installation of any building, structure, or other public work.
12. Specifies the amount of compensation paid to Agency employees or officers or to independent contractors providing personal or professional services to the Agency or relates to expense reimbursement to Agency officers or employees or to the use of Agency-paid credit cards or any travel compensation mechanism. However, a record described in this paragraph may be destroyed or disposed of pursuant to Government Code §60201 seven years after the date of payment.

CA Government Code §6200 et seq.: Government Code §6200 provides that an officer having custody of a public record may be subject to criminal penalties for willfully stealing, removing, secreting, destroying, mutilating, defacing, altering, or falsifying the record, or permitting another person to do so.

CA Government Code §7920.000 et seq.: The California Public Records Act (Government Code §7920.000 et seq.) provides definitions for writings and public records for the purpose of determining which public documents are required to be disclosed to the public upon request, and which public documents are confidential or otherwise exempt from disclosure.

Professional Standards and Suggested Retention Guidelines: Selected professional associations and other governmental agencies, such as the California Secretary of State and the California Special Districts Association, have published standards, model retention guidelines, and/or articles recommending retention periods for different types of records. Although these standards and guidelines are not binding upon the Agency, the Agency may take these documents into consideration in establishing the Agency's Records Retention Schedule and, where applicable, the Agency will identify deviations from these suggested guidelines within the Records Retention Schedule.

CA Code of Regulations §22620 et seq.: The State of California provides requirements and guidelines for Trustworthy Electronic Document or Record Preservation. This includes requirements for electronic document format, system backups, file compression, security, and policies and procedures for retaining official documents or records created or acquired using a trusted system.

CA Government Code §12168.7: The State establishes standards for storing and recording public records in electronic media or cloud computing storage services, including standards for the use of a Trusted System. Local government entities may adopt applicable standards for purposes of utilizing a Trusted System.

4. RESPONSIBILITIES

Active management of the Agency's records is required to ensure that the records are properly maintained. This section identifies elected officials, executive management, and staff members responsible for managing the Agency's records.

4.1 Board of Directors

The Board of Directors reviews and approves the Agency-wide Records and Information Management (RIM) Program, the Records Retention Schedule, and any substantive amendments to the Policy or Records Retention Schedule.

4.2 General Manager

The General manager is responsible for the following:

- a. Administering the Agency's RIM Program and overseeing that Policy parameters are implemented in a timely manner.
- b. Annually reviewing this Policy, the Records Retention Schedule, and related records management practices, and presenting any proposed amendments for adoption by the Board of Directors.
- c. Implementing and coordinating the Agency's Records and Information Management (RIM) program.
- d. Maintaining the Official Record of all documents related to the Agency's RIM program, and any amendments or updates thereto, including the following:
 - Policy
 - Records Retention Schedules
 - Master Index of Record Series
 - Requests for Destruction of Records
 - Authorizations to Destroy Records
 - Certifications of Destroyed Records
- e. Establishing and maintaining an inventory of physical records. The inventory shall identify the following aspects of each record:
 - Associated records series
 - Activity status (e.g., active, inactive)
 - Importance (e.g., vital, historical, confidential), where applicable
- f. Establishing and maintaining a program for the destruction of records once their respective retention periods have expired.
 - Overseeing the development of a Records Retention Schedule.
 - Reviewing and approving proposed administrative changes and updates to the Records Retention Schedule.
 - Reviewing and approving requests for the destruction of records that have reached the end of their retention period and are not subject to a legal or litigation hold and forwarding such requests to the Legal Counsel for authorization.
 - Receiving Legal Counsel approved requests for records destruction for final review and processing.
 - Approving the destruction of Duplicate Copies, Transitory Records, and Non-Records in accordance with this Policy once confirmed that the originals are

retained and the items are no longer needed for Agency business, in accordance with Section 7 of this Policy.

- g. Ensuring the security of records that have been identified as confidential.

4.3 Agency's Legal Counsel

The Agency's Legal Counsel shall be responsible for the following:

- a. Providing legal review of any proposed substantive amendments to this Policy or the Records Retention Schedule.
- b. Providing legal review of changes in the law relating to this Policy and the Records Retention Schedule.
- c. Reviewing all requests for records destruction and exercising discretion to approve or deny requests for destruction in accordance with this Policy.
- d. Forwarding all approved requests for destruction to the General Manager.

5. TYPES OF RECORDS

According to California state law a record includes any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics (Govt. Code section 7920.530).

What is a non-record?

It is often difficult to draw a clear distinction between record and non-record material. A helpful hint to follow in making the distinction is that non-record documents can be discarded as soon as they are read. Some examples are listed below:

- Routine transmittal and acknowledgement messages which do not add any information to the material they accompany.
- Source materials that have been superseded by an approved final version (for example, dictation, recordings, or working notes that have been transcribed or incorporated into a final record)
- Duplicate copies kept solely for convenience or reference.
- Electronic communications, such as routine email, text messages, instant messages, and chat, that do not document an Agency decision, action, or transaction.
- Routine informational and transactional items that have served their purpose – for example, meeting reminders, event and holiday notices, and completed routine service requests.
- Stocks of publications or blank forms that are kept for supply purposes only.
- Spam email, automated system notifications, and personal messages unrelated to Agency business.
- Library and reference materials not created by the Agency.

5.1 Ownership & Custody of Records

All documents, writings, or other forms of information prepared, owned, used, produced, acquired, or retained by employees during their responsibilities, regardless of physical form or characteristics, are the exclusive property of the Agency. Employees and contract workers shall have no expectation of privacy relating to Agency records.

Persons working remotely with Agency electronic records must use approved systems and comply with applicable information security and records management requirements. Agency records shall not be stored on personal devices, accounts, or other unapproved media except as expressly authorized. Any Agency record used outside an approved system must be returned to or stored in the designated Agency recordkeeping system when no longer needed for remote work. Physical Agency records may not be removed to private homes or offices except as expressly authorized.

If expressly authorized, employees or contract workers shall not maintain Agency physical records in private homes or offices for more than 90 calendar days. Before the expiration of the 90-day period, such records must either be returned to the Agency's records storage system or converted to an electronic Trusted Copy in accordance with this Policy and stored in the Agency's designated electronic recordkeeping system.

Physical records that have been converted to an electronic Trusted Copy may be destroyed in accordance with this Policy once the electronic copy has been validated and designated as the Official Record.

Records managed by outgoing officials, employees, contractors, or volunteers shall be retained for review by the General Manager or designee after separation from the Agency.

5.2 Vital Records

Vital Records are those records needed to continue business operations in the event of a disaster and will be identified as such on the Records Retention Schedule. Examples of preservation of vital records include, but are not limited to:

- Storing hard copies in a secure location either on site or off site.
- Storing electronic copies of vital records in the LAVWMA's Electronic Document Management System (EDMS).

Examples of vital records include, but are not limited to:

- Minutes
- Resolutions
- Recorded documents
- Accounts receivables
- Personnel files, including medical records
- Agency facility as-built plans

Up-to-date access codes, security codes, passwords and/or keys for accessing the EDMS must be maintained by the General Manager or their designated system administrator(s) to preserve vital records.

5.3 Historical Records

Historical Records are records that are valuable to future researchers to document the accomplishments, changes, and growth of the Agency. Record Series that may contain historical records will be identified within the Records Retention Schedules.

5.4 Confidential Records

There are many sources of legal authority to exempt a record from disclosure including, but not limited to, the California Public Records Act, Government Code §7920.000 through §7930.215. It would be impractical to list all definitions of confidential records in this Policy. If there is any question as to whether a particular record should be designated as confidential, the General Manager will consult the Agency's Legal Counsel.

Confidential records must be maintained with sufficient security, and in accordance with applicable laws, to protect their contents from unauthorized access. Procedures to ensure the security of confidential physical and electronic records will be the responsibility of the General Manager.

5.5 E-mail Communications

E-mail messages and any electronic attachments should be reviewed regularly to determine relevance to current Agency business. When relevant, the e-mail must be converted to an electronic record, or printed in hard copy, and retained with the associated topic or record series (e.g., project file, purchase order, professional services agreement) for the required retention period as designated in the Records Retention Schedules.

Routine e-mail messages are comparable to telephonic communications and are considered either Transitory Records or Non-records. Such e-mail is not intended to be retained in the ordinary course of Agency business, and the informational content of such communications is neither necessary nor intended to be preserved for future Agency use or reference.

E-mail systems are not intended to be, and will not be, used for the electronic storage or maintenance of official records, or as document management systems. E-mail communications are retained as follows:

- E-mail will automatically be removed and deleted permanently from the user's Inbox after 730 days.

5.6 Databases

For Records Retention purposes, the Agency considers all databases, whether residing on Agency systems or hosted by an outside source (Software as a Service or SaaS), to be transitory in nature since information is perpetually created, added, updated or modified during business activities. The blanket retention period for databases is While Active to reflect that only the current version has informational value to the Agency.

The Office of Record that uses, maintains and modifies a database must assure the information contained within the database is correct and accurate, and has an obligation to produce information from the database, as needed, to perform Agency business. Due to the transitory nature of databases, periodic reports produced from a database, and used for administrative, fiscal, legal or historical purposes, may become Official Records. Reports designated as Official Records must be maintained in accordance with the Records Retention Schedules.

For example, the Agency's Annual Budget Report captures the financial position at the end of a fiscal year and is used to inform the Agency Board of Directors, staff and citizens of the Agency's financial state. Thus, the report must be retained for the retention period designated in the Records Retention Schedule to reflect operational needs.

5.7 Trusted Copy (Migration of an Original Record)

Before designating a record as a Trusted Copy, legibility must be validated, and indexes or metadata confirmed as accurately reflecting the content of the original record.

Once the Trusted Copy has been validated and designated as the Official Record, the original record may be destroyed in accordance with this Policy, unless maintenance and retention of the physical records is recommended, such as governing body Minutes and Resolutions.

6. STORAGE AND PRESERVATION OF RECORDS

6.1 Active Records

Storage and preservation methods for active records must meet all the following minimum specifications:

- a. Records must be stored and maintained using complete inventories and accurate indexes which allow them to be identified, retrieved and disposed of in an expeditious manner.
- b. Records must be maintained so they are readily accessible to conduct current Agency business.
- c. Storage systems for records will accommodate hard-copy or electronic records and must also conform to the requirements of a Trusted System. Migration of original records to electronic form requires a process that complies with Section 5.7 of this policy.
- d. Filing systems should follow these guidelines:
 - d.1. Physical file folder labels should have a consistent style, not a mixture of different styles. This makes reading labels on physical files easier and increases access rates. File labeling should be consistent for the entire group of records.
 - d.2. A single filing system for primary and secondary indexing levels should be chosen and remain consistent. For example, after establishing primary file sections, select an alphabetical, alpha-numeric, or subject classification to control the sub-group files.
 - d.3. Record series should be kept together so that permanent records are separated from records with shorter retention requirements. When preparing files for a new calendar or fiscal year, set up files by retention period and add files to the inventory list including destruction dates.
 - d.4. Confidential files should be labeled with obvious notations to alert staff members on the special handling requirements.
 - d.5. Inactive records should be transferred to the Agency's record center or a storage provider to ensure that the maximum capacity is available for housing active records. The transfer must be reviewed, coordinated and approved by the General Manager.
 - d.6. The Agency is in the process of purchasing software (cloud or hosted records) as a secure repository of electronic records. Once the software system is acquired, that software will be the storage facility for the Agency's official records. Until the Agency implements its designated electronic records system, Agency records shall be maintained in approved existing systems in accordance with this Policy and applicable records-management procedures..

6.2 Inactive Records

Inactive records may be stored in a secured on-site Agency facility or an off-site service provider, as approved by the General Manager.

An off-site storage facility must:

- 1. Meet applicable state and local codes.
- 2. Provide protection from fire and intrusion.

3. Provide reasonable access to records in a timely manner.

The General Manager shall maintain an inventory of its inactive records in storage. Prior to sending records to storage, Duplicate Copies, Transitory Records and Non-Records must be removed and destroyed in accordance with this Policy.

6.3 Cloud or Hosted Electronic Records

Cloud stored or hosted electronic records must follow the LAVWMA's Records Retention Schedules.

The cloud or hosting company must:

1. Meet applicable state and local codes.
2. Provide protection from malicious deletion, corruption and ransomware.
3. Provide reasonable access to records in a timely manner.

7. DESTRUCTION OF RECORDS

7.1 Destruction of Physical or Electronic Records

The General Manager oversees and administers the Program, Records Retention Schedules, and the destruction of records. This applies to all records, regardless of format.

The General Manager must identify all records eligible for destruction pursuant to the Records Retention Schedule and create a Records Destruction Request Form for destruction approval. The form shall list all documents to be shredded, deleted, or otherwise destroyed and the corresponding retention periods pursuant to the Records Retention Schedule. The General Manager must approve and sign the Records Destruction Request Form and submit it to the Agency's Legal Counsel for reviewing and approving or denying requests.

The General Manager is responsible for confirming that records are destroyed and either signing the Records Destruction Request or obtaining the Certificate of Destruction from the destruction provider.

7.2 Destruction of Duplicate Copies

No Duplicate Copy will be maintained longer than the retention period of the original record and may be destroyed at any time within the retention period without formal destruction approval.

Prior to the destruction of a Duplicate Copy, staff and contract workers shall ensure that:

- a. The writing is, in fact, a Duplicate Copy and not an original record.
- b. The writing is no longer required for the operational needs of the employee.

7.3 Destruction of Transitory Records

A Transitory Record may be destroyed at any time without formal destruction approval. Prior to the destruction of a Transitory Record, staff and contract workers shall ensure that:

- a. The writing is, in fact, a Transitory Record and not an original record.
- b. The writing is no longer required for the operational needs of the employee.

7.4 Destruction of Non-Records

A non-record may be destroyed at any time without formal destruction approval. Prior to the destruction of a non-record, staff and contract workers shall ensure that:

- a. The writing is, in fact, a non-record.
- b. The writing is no longer required for the operational or reference needs of the employee.

7.5 Destruction of Original Records After Migration to a Trusted Copy

Once an original record has been migrated to a Trusted Copy, the original record may be destroyed in accordance with this Policy, unless maintenance and retention of the physical record is suggested to prove official record status, such as governing body Minutes, Resolutions and recorded documents which may have embossments or other non-reproduceable approval markings. Request for the destruction of an original record after migration to a trusted copy shall follow the procedures outlined in Section 7.1 Destruction of Physical or Electronic Records.

7.6 Destruction of Information on Obsolete Electronic Equipment

Certain electronic equipment, including Trusted Systems, used by the Agency may contain methods of electronic storage of Agency information. This information may be captured and stored as the equipment is used in the normal course of business.

Prior to decommissioning Agency equipment, the General Manager shall ensure that all information relating to Agency business will be deleted or otherwise made illegible from any data storage systems on or within the equipment. Examples of such equipment include, but are not limited to:

- Multipurpose printing, scanning or copying equipment
- Tablets
- Cellular phones
- USB flash drives
- External hard drives

Under no circumstances shall any electronic equipment be released from Agency property for recycling, destruction or other disposition until the Agency information has been deleted. If destruction of such information is not performed within the Agency, written confirmation of the destruction should be provided to the General Manager from the equipment provider or recycler.

7.7 Destruction of Non-paper Media Records

Official Records stored on non-paper media must be destroyed in a manner consistent with this Policy. Documentation for the destruction of these records shall be prepared and retained in accordance with Section 7.1 of this Policy.

After all Official Records stored on non-paper media (e.g., magnetic tape, disks, diskettes, or other magnetic medium) have been destroyed, the medium itself may be reused, recycled or destroyed.

8. PROCEDURES

The procedures for the management, storage and preservation, and destruction of records are as follows:

8.1 Access to Electronic Records Systems

The General Manager shall approve access to electronic records systems for any employees, contract employees, consultants, or volunteers, as needed to fulfill the requirements of their employment.

Any electronic records system is subject to audit by the General Manager on a periodic basis. An audit may include operations performed on the database, the date and time an operation occurred and by whom, the database record number, the database index and/or metadata associated with the record, or any other pertinent data where practical.

8.2 Process for Imaging of Agency Records and Documents

The Agency's EDMS is used for archiving electronic Trusted Copies and for electronic copies of documents for which there is no legal authorization for destruction (e.g., records affecting title to real property or liens thereon; minutes or resolutions of the legislative body or of a commission or committee). These documents must be stored within the EDMS, indexed as required by this Policy, and searchable utilizing Optical Character Recognition (OCR).

Procedures for scanning a hard-copy document for storage in the EDMS as an Official Record shall be established and reviewed periodically by the General Manager. Priority shall be given to those records that must be retained on a permanent basis, and to those records which need to be frequently retrieved.

Examples of records eligible for scanning include, but are not limited to, the following:

- Resolutions
- Minutes
- Plans and Permits
- Contracts and Agreements
- Approved Construction Plans
- Purchase Orders and other financial records.

The General Manager shall review and purge unnecessary documents from records prior to scanning. Purging involves evaluating documents within a record, and discarding documents determined to be Transitory Records, Duplicate Copies or Non-Records.

After images are created, the General Manager shall verify the images are legible and complete. Images should be verified, indexed, and the OCR process completed as soon as possible after scanning occurs.

Non-scanned images must be imported into the EDMS, indexed and the OCR process completed, thereby meeting all the same requirements as described above for scanned images.

When creating an electronic Trusted Copy, the General Manager must determine that the original record has been successfully transferred into electronic format as defined above. The original record may then be destroyed in accordance with this Policy.

All procedures will be evaluated by the General Manager and updated, as needed.

8.3 Destruction of Official Records

Official Records for which the retention period identified on the Records Retention Schedule has been fulfilled will be destroyed in accordance with this Policy. Unless placed on legal hold by the General Manager or Legal Counsel, records designated for destruction must be destroyed within the calendar year after the record expires.

A record that expires during the current calendar year must be destroyed by December 31st of the following calendar year at the latest. For example:

<u>If expiration occurs on:</u>	<u>Then destroy no earlier than:</u>	<u>or no later than:</u>
January 1, 2025	January 1, 2026	December 31, 2026
December 31, 2025	January 1, 2026	December 31, 2026

Periodic reviews of records shall be performed by the General Manager. Records for which the retention period has elapsed must be identified and included on a Records Destruction Request Form, which is signed by the General Manager, then forwarded to the Legal Counsel for review and approval. Upon the Legal Counsel's review and approval, the General Manager will review the form for approval, completeness, and processing.

Hard-copy records approved for destruction must be destroyed by the General Manager, or their designee, using one of the following methods:

- **Recycling Bin:** Expired records that are not confidential.
- **Shredding:** All other records approved for destruction.

NOTE: Confidential records must be shredded. Commercial service providers may be used for the destruction of paper documents, if destruction is completed on-site at Agency facilities. A Certificate of Destruction from the commercial service provider must be acquired by the General Manager and will be maintained with the approved Records Destruction Request Form.

Destruction of Official Records in electronic format must follow the same approval process as outlined above for the destruction of hard-copy records. Upon approval, electronic records must be destroyed by the General Manager, or their designee, using methods that permanently delete the records.

The destruction process must include all Duplicate Copies of the Official Record.

Following the destruction of records, the General Manager shall certify that the records have been destroyed. All Certificates of Destruction shall be maintained by the General Manager.

9. DEFINITIONS

Active Records: Records referenced and readily accessible in the general conduct of current Agency business.

Citation(s): Citations listed in the Records Retention Schedule identify the basis for the applicable retention period.

Confidential Record: For purposes of this Policy, a Confidential Record is a record that is required by law to be kept confidential or that the Agency determines may be withheld from disclosure under applicable law. There are many sources of legal authority that define a Confidential Record including, but not limited to, the *California Public Records Act*, Government Code §7920.000 through §7930.215. Therefore, it would be impractical to list all definitions of a Confidential Record within this Policy. If there is any question as to whether a record is a Confidential Record, staff should consult with the General Manager and/or Legal Counsel prior to disclosure.

Examples of a Confidential Record may include, but are not limited to, the following:

- a. Personnel Records:
Examples include any personnel, medical or similar files, the disclosure of which would cause an unwarranted invasion of personal privacy.
- b. Pending Litigation or Claims:
In general, Government Code §7927.200 provides that when litigation or a claim is filed against the Agency, the records pertaining to the litigation or claim are exempt from public disclosure until the litigation or claim has been adjudicated or settled.
- c. Attorney/Client Privilege and Attorney Work Product:
Communications between the Agency and Legal Counsel made for the purpose of seeking or providing legal advice may be protected by the attorney-client privilege, and attorney work product shall be protected as provided by applicable law.
- d. Police Records and Investigative Reports:
Examples include, but are not limited to, a wide variety of records such as:
 - Police investigations, intelligence, analysis, and conclusions
 - Information that may endanger the safety of any person
 - Juvenile records
 - Active case files
- e. Feasibility Studies for Property Acquisition or Public Contracts:
Unless required to be disclosed by eminent domain law, feasibility studies relative to the acquisition of property, or to prospective public supply and construction contracts, are not disclosed until all the property has been acquired or until the contract or agreement has been executed.
- f. Proprietary Information Obtained by the Agency:
Proprietary information will not be disclosed if any of the following apply:
 - a. The outside party providing the information submits the information with the expressed intention to maintain the confidence.
 - b. The information has not previously been disclosed to others.
 - c. The outside party has a reasonable expectation that the information will be maintained in confidence based upon how the Agency obtained the information.

Examples include, but are not limited to, financial information or computer source code submitted as a condition of a license, permit or certificate.

Public Interest Balancing Test

If a writing does not fit a specific category of exemption, the writing *may* still be exempt if it meets the Public Interest Balancing Test. According to GC §7922.000, An agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of [the Public Records Act] or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record. Since there is a significant body of case law analyzing this balancing test, Agency staff must consult with the Legal Counsel's office when determining whether a record may be disclosed upon request.

Databases: Databases consist of electronic files and fields of data, which manage and store information useful to the Agency. Databases are modified over time through the addition, deletion, or modification of data. Databases may be maintained by the Agency or hosted by outside sources. The specific policy regarding databases can be found in Section 5.6.

Duplicate Copy: A record that is a copy of an Official Record if the copy is not within the definition of a Trusted Copy. In addition to hard copies of Official Records, Duplicate Copies also include, but are not limited to, database backups or other copies of electronic records.

Electronic Document Management System (EDMS): The database repository for official electronic records is considered the Agency's Electronic Document Management System. The EDMS is the trustworthy electronic document or record preservation repository for all records where the electronic document is considered the official record.

Electronic Mail (E-mail): Messages and communications transmitted over internal and external networks. Electronic Mail may constitute an Official Record, Transitory Record, or Non-record depending on its content and purpose, as provided in Section 5.5.

Electronic Records: Records that contain information readable by machine or computer, and which may include information such as text, numbers, graphs, line drawings, pictures, images, video, or sound are considered Electronic Records. Examples of Electronic Records include, but are not limited to, the following:

- Audio or video recordings
- Electronic mail
- Databases
- Digital images
- Presentation graphics
- Word processing files
- Spreadsheet files
- Voicemail

Electronic Records may reside on, but are not limited to, media such as magnetic disks or tapes, audio or video cassettes, optical disks, DVDs, CDs, hard drives, memory sticks or in the EDMS.

Historical Records: Records valuable to future researchers that document accomplishments, changes, and growth of the Agency.

Inactive Records: Records that are no longer referenced, nor required to be readily accessible, in the general conduct of current Agency business. Such records may be stored at an off-site storage location or within the work area during their required retention period.

Indexes and Metadata: Information supporting a record that is unique and distinguishes one record from another. Indexes and Metadata may include, but are not limited to, record titles, record series codes, sequential identification numbers, dates, Office of Record, project number, account number, or other source information describing the record's contents. Such information, in and of itself, does not constitute a record.

Litigation Hold: A temporary hold on destruction of any documents potentially relevant to reasonably anticipated, pending or threatened litigation.

Media: The physical format in which a record is maintained including, but not limited to, paper, photographic, micrographic, computer storage, and any other recording or storage method.

Metadata: Information about a document or document set entered into a template after scanning and/or migrating into the EDMS. Examples include document name, dates, department, project number, address, etc. that uniquely identify the document or document set.

Non-record Writing: Any writing which is not within the definition of a Record. Examples of Non-record Writings include writings that are not directly related to the conduct of the Agency's business and/or are used specifically for reference including, but not limited to, textbooks, brochures, catalogs, or seminar announcements.

Official Record: An Official Record is the original record or Trusted Copy having the legally recognized and enforceable quality of any writing containing information related to the conduct of the Agency's business.

Office of Record (OOR): The person, department, or entity responsible for maintaining a particular record series in accordance with this Policy and the Records Retention Schedule.

Optical Character Recognition (OCR): A process software system that reviews a scanned document and recognizes text within the image allowing full-text searching of the electronic document. Documents may be OCR processed externally using scanner software options or within the EDMS.

Permanent Records: Records that are required to be kept in perpetuity, usually identified by statute or other written guidance. Examples include, but are not limited to, original minutes, resolutions, and land grant deeds.

Record: For retention purposes, a Record includes any writing containing information relating to the conduct of the business prepared, owned, used, or retained by the organization regardless of physical form or characteristics. Records include the subsets of trusted copies, confidential records, vital records, historical records, active records, inactive records, electronic records and transitory records, as defined within this Policy.

Record Inventory: An inventory helps build and maintain the Records Retention Schedules. An inventory of records includes a listing where the following information is recorded:

- The type of record (record series)
- The date range of the records
- The format of the record (paper, microfilm or electronic)

Records Retention Schedule: The Records Retention Schedule lists the record series prepared, owned, used, or retained by the Agency and identifies the required retention period for each record series. The Records Retention Schedule is approved by resolution of the Agency Board of Directors and may be amended or updated as authorized by this Policy.

Record Series: A set of records which are created, stored and maintained together. Record Series are used as a method to organize records by function and/or document type within the Agency. Examples of different Record Series include, but are not limited to, the following:

- Contracts
- Purchase Orders
- Resolutions
- Minutes of official meetings
- Timecards
- Financial Statements

Record Storage: A designated area for the storage of inactive records, which is well-organized to allow for efficient retrieval of records as needed for the Agency. The Agency shall maintain

custody and control over records and ensure prompt and efficient handling and destruction of records pursuant to the Records Retention Schedules.

Retention Period: A Retention Period is the length of time that a particular record is retained by the Agency before it is disposed of in accordance with this Policy. The Retention Periods for Agency records are identified on the Records Retention Schedule.

Transitory Records: A writing with only transitory (short-lived) value since the information is used for a relatively short period of time. Examples include, but are not limited to, the following documents that are not retained in the ordinary course of business:

- Preliminary drafts
- Notes
- Interagency/intra-agency memoranda
- Voicemail
- Handheld recorders

Trusted Copy: A Trusted Copy is a copy of an originally created record if the copy is created on a Trusted System. Trusted Copies are photographically, or electronically generated documents controlled by daily operational procedures and policies to ensure reasonable expectations of document integrity, free from physical or electronic additions, subtractions or other modifications that would change the content of the original document.

Once a Trusted Copy is created, it will replace the original source document, and the Trusted Copy must then be retained as the Official Record in accordance with the requirements of this Policy and the Records Retention Schedules.

Trusted System: As defined by Government Code §12168.7(c), Trusted System means a combination of techniques, policies, and procedures for which there is no plausible scenario in which a document retrieved from or reproduced by the system could differ substantially from the document that is originally stored.

Vital Record: Includes records that are needed to continue or resume basic Agency operations in the event of a disaster.

Writing: As defined by Government Code §7920.545, Writing means any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.

Thus, Writing is a comprehensive definition that includes the subsets of public records, trusted copies, confidential records, duplicate copies, non-record writings, vital records, historical records, active records, inactive records, electronic records, and transitory records, as defined within this Policy.

**ITEM NO. 9 THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
REVISED TENTATIVE ORDER FOR LIVERMORE-AMADOR VALLEY WATER
MANAGEMENT AGENCY**

To: LAVWMA Board of Directors
From: Levi Fuller, General Manager
Subject: LAVWMA NPDES Permit – October 1, 2026 – September 30, 2031

Action Requested

None at this time. This is an information item only.

Summary

On August 12, 2026, the California Regional Water Quality Control Board renewed the National Pollutant Discharge Elimination System (NPDES) permit for LAVWMA's Export and Storage Facilities (NPDES PERMIT CA0038679). The renewed permit becomes effective on October 1, 2026, and expires on September 30, 2031.

The NPDES permit governs the operation of LAVWMA facilities associated with the intermittent wet-weather discharge the fully treated effluent through LAVWMA's San Leandro Sample Station outfall (Discharge Point 002) and Alamo Canal outfall (Discharge Point 003).

The LAVWMA General Manager and DSRSD Operations have reviewed the renewed permit and are preparing to implement its requirements. Based on that review and LAVWMA's operating history, staff expects the facilities can continue to be operated in compliance with the renewed NPDES permit.

Recommendation Action Requested

None at this time. This is an information item only.

Attachment

Revised Tentative Order NPDES Permit No. CA0038679

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

1515 Clay Street, Suite 1400, Oakland, California 94612
waterboards.ca.gov/sanfranciscobay

**REVISED TENTATIVE ORDER NO. R2-2026-XXXX
NPDES PERMIT NO. CA0038679**

The following Discharger is subject to the waste discharge requirements (WDRs) set forth in this Order:

Discharger **Livermore-Amador Valley Water Management Agency (LAVWMA)
Dublin San Ramon Services District
City of Livermore
City of Pleasanton**

Name of Facility **LAVWMA Export and Storage Facilities**

Facility Address **7176 Johnson Drive
Pleasanton, CA 94588
Alameda County**

Table 1. Discharge Location

Discharge Point	Effluent Description	Discharge Point Latitude (North-South)	Discharge Point Longitude (East-West)	Receiving Water
002	Secondary Treated Municipal Wastewater	37.6750°	-122.1553°	San Lorenzo Creek
003	Secondary Treated Municipal Wastewater	37.6844°	-121.9153°	Alamo Canal

This Order was adopted on:

XXXX, 2026

This Order shall become effective on:

October 1, 2026

This Order shall expire on:

September 30, 2031

CIWQS regulatory measure number:

XXXXXX

The Discharger shall file a Report of Waste Discharge as an application for updated WDRs in accordance with title 23, California Code of Regulations, and an application for reissuance of a National Pollutant Discharge Elimination System (NPDES) permit no later than **December 31, 2030**. The U.S. Environmental Protection Agency (U.S. EPA) and the California Regional Water Quality Control Board, San Francisco Bay Region (Regional Water Board) have classified this discharge as “**minor**.”

Item No. 9 - Attachment

Livermore-Amador Valley Water Management Agency (LAVWMA)
LAVWMA Export and Storage Facilities
Intermittent Wet Weather Discharge

Order No. R2-2026-XXXX
NPDES Permit No. CA0038679

I hereby certify that this Order with all attachments is a full, true, and correct copy of the Order adopted by the Regional Water Board on the date indicated above.

Eileen M. White, P.E., Executive Officer

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1. FACILITY INFORMATION

Information describing the Livermore-Amador Valley Water Management Agency (LAVWMA), the Dublin San Ramon Services District, the City of Livermore, and the City of Pleasanton (collectively, the Discharger) and the intermittent wet weather discharge from the LAVWMA Export and Storage Facilities (collectively, the Facility) is summarized on the cover page and in Fact Sheet (Attachment F) sections 1 and 2. Fact Sheet section 1 also includes information regarding the permit application.

2. FINDINGS

The Regional Water Board finds the following:

- 2.1. Legal Authorities.** This Order serves as WDRs pursuant to California Water Code article 4, chapter 4, division 7 (commencing with § 13260). This Order is also issued pursuant to federal Clean Water Act (CWA) section 402 and implementing regulations adopted by U.S. EPA and Water Code chapter 5.5, division 7 (commencing with § 13370). It shall serve as an NPDES permit authorizing the Discharger to discharge into waters of the United States as described in Table 1 subject to the WDRs in this Order.
- 2.2. Background and Rationale for Requirements.** The Regional Water Board developed the requirements in this Order based on information the Discharger submitted as part of its application, information obtained through monitoring and reporting programs, and other available information. The Fact Sheet contains background information and rationale for the requirements in this Order and is hereby incorporated into and constitutes findings for this Order. Attachments A through E and G are also incorporated into this Order.
- 2.3. Provisions and Requirements Implementing State Law.** The receiving water limitations in section 5 of this Order and Provision 1.9.1 in Attachment G are included to implement state law only. These provisions are not required or authorized under the federal CWA; consequently, violations of these provisions are not subject to the enforcement remedies that are available for NPDES violations.
- 2.4. Notification of Interested Parties.** The Regional Water Board notified the Discharger and interested agencies and persons of its intent to prescribe these WDRs and has provided an opportunity to submit written comments and recommendations. Fact Sheet section 8.1 provides details regarding the notification.
- 2.5. Consideration of Public Comment.** The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the discharge. Fact Sheet section 8.3 provides details regarding the public hearing.

THEREFORE, IT IS HEREBY ORDERED that Order R2-2021-0007 (previous order), as amended by Order R2-2023-0023, is rescinded upon the effective date of this Order, except for enforcement purposes, and, in order to meet the provisions contained in Water Code division 7 (commencing with § 13000) and regulations adopted thereunder and the provisions of the CWA) and regulations and guidelines adopted thereunder, the Discharger shall comply with the requirements in this Order. This action in no way prevents the Regional Water Board from taking enforcement action for violations of the previous order.

3. DISCHARGE PROHIBITIONS

- 3.1.** Discharge of treated or partially treated wastewater at a location or in a manner different from that described in this Order is prohibited.
- 3.2.** Discharge to San Lorenzo Creek is prohibited, except during peak wet weather flows after the Discharger fully utilizes the maximum allowed hydraulic capacity available in the East Bay Dischargers Authority (EBDA) pipeline and except during discharge exercises as described in Prohibition 3.5. Wet weather discharges to San Lorenzo Creek shall not exceed 21.5 million gallons per day (MGD). Discharge exercises to San Lorenzo Creek shall not exceed 450,000 gallons per discharge event. Compliance shall be evaluated at Monitoring Location EFF-002 as described in the Monitoring and Reporting Program (MRP).
- 3.3.** Discharge to Alamo Canal is prohibited, except during peak wet weather flows after the Discharger fully utilizes its maximum export pumping capacity of 41.2 MGD to the EBDA pipeline (or to the EBDA pipeline and the San Lorenzo Creek outfall) below and except during discharge exercises as described in Prohibition 3.5. Discharge exercises to Alamo Canal shall not exceed 140,000 gallons per discharge event. Compliance shall be evaluated at Monitoring Location EFF-003 as described in the MRP.
- 3.4.** The bypass of untreated or partially treated wastewater to waters of the United States is prohibited, except as provided for in Attachment D sections 1.7.2 and 1.7.3 of this Order.
- 3.5.** Discharge to San Lorenzo Creek and Alamo Canal during discharge exercises is prohibited to no more than twice per year from Discharge Point 002 and no more than once per year from Discharge Point 003. Discharge to Alamo Canal shall only take place during the wet season, November 1 to April 30, when there is also a significant flow increase in Alamo Canal.

4. EFFLUENT LIMITATIONS

- 4.1. Effluent Limitations.** Discharges at Discharge Points 002 and 003 shall meet the following effluent limitations, with compliance measured at Monitoring Locations EFF-002 and EFF-003 as described in the MRP:

Table 2. Effluent Limitations

Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum	One-Hour Average
Carbonaceous Biochemical Oxygen Demand (5-day @ 20°C) (CBOD ₅)	mg/L	-	40	-	-	-	-
Total Suspended Solids (TSS)	mg/L	-	45	-	-	-	-
pH ^[1]	s.u.	-	-	-	6.5	8.5	-
Lead, Total	µg/L	8.4	-	17	-	-	-
<i>Escherichia</i> Coliform Bacteria	CFU/100 mL	-	-	320	-	-	-
Chlorine, Total Residual	mg/L	-	-	-	-	-	0.019 ^[2]

Footnotes:

^[1] If the Discharger monitors pH continuously, pursuant to Code of Federal Regulation, Title 40 (40 C.F.R.), section 401.17 the Discharger shall be in compliance with this pH limitation provided that both of the following conditions are satisfied: (i) the total time during which the pH is outside the required range shall not exceed 7 hours and 26 minutes in any calendar month; and (ii) no individual excursion from the required pH range shall exceed 60 minutes.

^[2] If monitoring continuously, to evaluate compliance with the one-hour average effluent limitation, the Discharger shall consider all readings recorded within each one-hour period during the discharge event. If monitoring using grab samples, to evaluate compliance with the one-hour average effluent limitation, the Discharger shall consider all samples taken within each two-hour period during the discharge event. The monitoring period shall begin within the first hour of the discharge.

5. RECEIVING WATER LIMITATIONS

Discharges shall not cause an exceedance of the aquatic toxicity objectives specified in section II.C of the *State Policy for Water Quality Control: Toxicity Provisions* (Toxicity Provisions) in the receiving waters.

6. PROVISIONS

6.1. Standard Provisions

6.1.1. The Discharger shall comply with all “Standard Provisions” in Attachment D.

6.1.2. The Discharger shall comply with all applicable provisions of the “Regional Standard Provisions, and Monitoring and Reporting Requirements for NPDES Wastewater Discharge Permits” in Attachment G.

6.1.3. If there is any conflict, duplication, or overlap between provisions in this Order, the more stringent provision shall apply.

6.2. Monitoring and Reporting Provisions

The Discharger shall comply with the MRP, Attachment E, and future revisions thereto, and applicable monitoring and reporting requirements in Attachments D and G.

6.3. Special Provisions

6.3.1. **Reopener Provisions.** The Regional Water Board may modify or reopen this Order prior to its expiration date in any of the following circumstances as allowed by law or as otherwise authorized by law. The Discharger may request a permit modification based on any of these circumstances. With any such request, the Discharger shall include antidegradation and anti-backsliding analyses as necessary.

6.3.1.1. If present or future investigations demonstrate that the discharges governed by this Order have or will have a reasonable potential to cause or contribute to adverse impacts on water quality or beneficial uses of the receiving waters;

6.3.1.2. If new or revised water quality objectives or total maximum daily loads (TMDLs) come into effect for San Francisco Bay or contiguous water bodies (whether statewide, regional, or site-specific). In such cases, effluent limitations in this Order may be modified as necessary to reflect the updated water quality objectives or wasteload allocations. Adoption of the effluent limitations in this Order does not restrict in any way future modifications based on legally adopted water quality objectives or TMDLs or as otherwise permitted under federal regulations governing NPDES permit modifications;

6.3.1.3. If translator, dilution, or other water quality studies provide a basis for determining that a permit condition should be modified;

6.3.1.4. If a State Water Board precedential decision, new policy, new law, or new regulation is adopted;

6.3.1.5. If an administrative or judicial decision on a separate NPDES permit or WDRs addresses requirements similar to this discharge; or

6.3.1.6. If the Discharger requests adjustments in effluent limitations due to the implementation of stormwater diversion pursuant to the Municipal Regional Stormwater Permit (Permit CAS612008) for redirecting dry weather and first flush discharges from the storm drain system to the sanitary sewer system as a stormwater pollutant control strategy.

6.3.1.7. To revise the aquatic toxicity provisions, if the California Supreme Court determines that the Test of Significant Toxicity cannot be used in NPDES permits and the State Water Board suspends or revises the aquatic toxicity water quality standards.

6.3.2. Effluent Characterization Study and Report

6.3.2.1. **Study Elements.** The Discharger shall characterize and evaluate the discharge from Discharge Point 001 as required by the MRP to verify that the

reasonable potential analysis conclusions of this Order remain valid and to inform the next permit reissuance. If the concentration of any of the priority pollutants listed in Attachment G, Table B, significantly increases over past performance, the Discharger shall investigate the cause of any such increase. The investigation may include, but need not be limited to, an increase in monitoring frequency, monitoring of internal process streams, and monitoring of influent sources. The Discharger shall establish remedial measures addressing any increase resulting in reasonable potential to cause or contribute to an exceedance of applicable water quality objectives. This requirement may be satisfied through identification of the constituent as a “pollutant of concern” in the Discharger’s Pollutant Minimization Program, described in Provision 6.3.3 and NPDES Permit CA0037869 (for the EBDA common outfall).

- 6.3.2.2. **Reporting Requirements.** The Discharger shall summarize the data evaluation and any applicable source investigation in the annual self-monitoring report associated with the year in which samples were collected. The Discharger shall also report the pollutants detected at or above applicable water quality objectives (see Fact Sheet Table F-7 for the objectives) in the report’s transmittal letter. This requirement does not apply to pollutants with effluent limitations (see Table 2 of this Order).

6.3.3. Pollutant Minimization Program

- 6.3.3.1. The Discharger shall develop and conduct a Pollutant Minimization Program as described below when there is an effluent limitation exceedance of a priority pollutant or when there is evidence that suggests a priority pollutant is present in the effluent above an effluent limitation (e.g., sample results reported as detected but not quantified [DNQ] when the effluent limitation is less than the method detection limit [MDL], sample results from analytical methods more sensitive than those methods required by this Order, presence of aquatic toxicity, health advisories for fish consumption, or results of benthic or aquatic organism tissue sampling) and either:
- 6.3.3.1.1. A sample result is reported as DNQ and the effluent limitation is less than the Reporting Level (RL); or
- 6.3.3.1.2. A sample result is reported as not detected (ND) and the effluent limitation is less than the MDL, using definitions described in Attachment A and reporting protocols described in the MRP.
- 6.3.3.2. If triggered for a reason set forth in Provision 6.3.3.1, above, the Discharger’s Pollutant Minimization Program shall include, but not be limited to, the following actions and submittals:
- 6.3.3.2.1. An annual review and semi-annual monitoring of potential sources of the reportable priority pollutants, which may include fish tissue monitoring and

other bio-uptake sampling, or alternative measures when source monitoring is unlikely to produce useful analytical data;

- 6.3.3.2.2. Quarterly monitoring for the reportable priority pollutants in the influent to the Facility. The Executive Officer may approve alternative measures when influent monitoring is unlikely to produce useful analytical data;
- 6.3.3.2.3. Submittal of a control strategy designed to proceed toward the goal of maintaining concentrations of the reportable priority pollutants in the effluent at or below the effluent limitation;
- 6.3.3.2.4. Implementation of appropriate cost-effective control measures for the reportable priority pollutants, consistent with the control strategy; and
- 6.3.3.2.5. Inclusion of the following specific items within the annual report required by MRP Section 5.2.2:
 - 6.3.3.2.5.1. All Pollutant Minimization Program monitoring results for the previous year;
 - 6.3.3.2.5.2. List of potential sources of the reportable priority pollutants;
 - 6.3.3.2.5.3. Summary of all actions undertaken pursuant to the control strategy; and
 - 6.3.3.2.5.4. Description of actions to be taken in the following year.

6.3.4. Other Special Provisions

- 6.3.4.1. **Wet weather Discharge Notification.** The Discharger shall notify the Regional Water Board of any wet weather discharge that complies with the discharge prohibitions in section 3 (Discharge Prohibitions) of this Order within three business days of the discharge occurring. This does not apply to the discharge exercises described in Discharge Prohibitions 3.2 and 3.3. The notice shall include the date and time the discharge is initiated and the estimated discharge duration and volume. Discharges (both wet weather and discharge exercise) violating a discharge prohibition or effluent limitation must comply with the notification and reporting requirements in section 5.5 of Attachments D and G.
- 6.3.4.2. **Wet Weather Discharge Annual Technical Report.** The Discharger shall submit a summary of all wet weather discharges that occurred during the preceding wet season (November 1 to April 30) with its annual self-monitoring report (see MRP section 5.2.2.). The Discharger shall include a description of how the Facility was operated to maximize onsite storage and hydraulic export capacity available in the EBDA pipeline to minimize the need to discharge to San Lorenzo Creek and Alamo Canal.

- 6.3.4.3. **Wet Weather Facilities Management Plan.** The Discharger shall include a Wet Weather Facilities Management Plan review with the annual self-monitoring report (see MRP section 5.2.2). The plan shall describe strategies to maximize onsite storage and export capacity available in the EBDA pipeline and minimize the need to discharge to San Lorenzo Creek and Alamo Canal.
- 6.3.4.4. **Chlorine Process Control Plan.** The Discharger shall implement a Chlorine Process Control Plan to ensure that it adds sufficient dechlorinating chemicals to target a chlorine residual of 0.0 mg/L at the discharge point. The Operation and Maintenance Manual shall include the information necessary to implement the Chlorine Process Control Plan.

ATTACHMENT A – DEFINITIONS AND ABBREVIATIONS

DEFINITIONS

Alternative Hypothesis

Statement used to propose a statistically significant relationship in a set of given observations. Under the TST approach, when the Null Hypothesis is rejected, the Alternative Hypothesis is accepted in its place, indicating a relationship between variables and an acceptable level of toxicity.

Arithmetic Mean (μ)

Also called the average, sum of measured values divided by the number of samples. For ambient water concentrations, the arithmetic mean is calculated as follows:

$$\text{Arithmetic mean} = \mu = \Sigma x / n$$

where: Σx is the sum of the measured ambient water concentrations,
and n is the number of samples

Average Monthly Effluent Limitation (AMEL)

Highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

Average Weekly Effluent Limitation (AWEL)

Highest allowable average of daily discharges over a calendar week (Sunday through Saturday), calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week.

Bioaccumulative

Taken up by an organism from its surrounding medium through gill membranes, through epithelial tissue, or from food and subsequently concentrated and retained in the body of the organism.

Calendar Month(s)

Period from the first day of a month through the last day of a month (e.g., January 1 to January 31). For toxicity monitoring, the period is from the first day of a routine monitoring test to the day before the corresponding day of the next month (e.g., from June 15 to July 14), or to the last day of the next month if there is no corresponding day (e.g., January 31 to February 28).

Carcinogenic

Known to cause cancer in living organisms.

Coefficient of Variation (CV)

Measure of data variability calculated as the estimated standard deviation divided by the arithmetic mean of the observed values.

Daily Discharge

Either: (1) the total mass of a constituent discharged over a calendar day (12:00 a.m. through 11:59 p.m.) or any 24-hour period that reasonably represents a calendar day for purposes of sampling (as specified in the permit) for a constituent with limitations expressed in units of mass; or (2) the unweighted arithmetic mean measurement of a constituent over a day for a constituent with limitations expressed in other units of measurement (e.g., concentration)

The daily discharge may be determined by the analytical results of a composite sample taken over the course of one day (a calendar day or other 24-hour period defined as a day) or by the arithmetic mean of analytical results from one or more grab samples taken over the course of the day.

For composite sampling, if 1 day is defined as a 24-hour period other than a calendar day, the analytical result for the 24-hour period is considered the result for the calendar day in which the 24-hour period ends.

Detected, but Not Quantified (DNQ)

Sample results less than the RL, but greater than or equal to the laboratory's MDL. Sample results reported as DNQ are estimated concentrations.

Dilution Credit

Amount of dilution granted to a discharge in the calculation of a water quality-based effluent limitation, based on the allowance of a specified mixing zone. It is calculated from the dilution ratio or determined through conducting a mixing zone study or modeling of the discharge and receiving water.

Effluent Concentration Allowance (ECA)

Value derived from the water quality criterion or objective, dilution credit, and ambient background concentration that is used, in conjunction with the CV for the effluent monitoring data, to calculate a long-term average (LTA) discharge concentration. The ECA has the same meaning as wasteload allocation (WLA) as used in U.S. EPA guidance (*Technical Support Document for Water Quality-based Toxics Control*, March 1991, second printing, EPA/505/2-90-001).

Effective Concentration (EC)

The EC is a point estimate of the toxicant concentration that would cause an adverse effect on a quantal, "all or nothing," response (such as death, immobilization, or serious incapacitation) in a given percent of the test organisms. If the effect is death or immobility, the term lethal concentration (LC) may be used. EC values may be calculated using point estimation techniques such as probit, logit, and Spearman-Kärber. EC25 is the concentration of toxicant (in percent effluent) that causes a response in 25 percent of the test organisms.

Enclosed Bays

Indentations along the coast that enclose an area of oceanic water within distinct headlands or harbor works. Enclosed bays include all bays where the narrowest

distance between the headlands or outermost harbor works is less than 75 percent of the greatest dimension of the enclosed portion of the bay. Enclosed bays include, but are not limited to, Humboldt Bay, Bodega Harbor, Tomales Bay, Drake's Estero, San Francisco Bay, Morro Bay, Los Angeles-Long Beach Harbor, Upper and Lower Newport Bay, Mission Bay, and San Diego Bay. Enclosed bays do not include inland surface waters or ocean waters.

Estimated Chemical Concentration

Concentration that results from the confirmed detection of a substance below the ML by the analytical method.

Estuaries

Waters, including coastal lagoons, located at the mouths of streams that serve as areas of mixing for fresh and ocean waters. Coastal lagoons and mouths of streams that are temporarily separated from the ocean by sandbars shall be considered estuaries. Estuarine waters are considered to extend from a bay or the open ocean to a point upstream where there is no significant mixing of fresh water and seawater. Estuarine waters included, but are not limited to, the Sacramento-San Joaquin Delta, as defined in Water Code section 12220; Suisun Bay; Carquinez Strait downstream to the Carquinez Bridge; and appropriate areas of the Smith, Mad, Eel, Noyo, Russian, Klamath, San Diego, and Otay rivers. Estuaries do not include inland surface waters or ocean waters.

Inhibition Concentration (IC)

The IC is a point estimate of the toxicant concentration that would cause a given percent reduction in a nonlethal, nonquantal biological measurement, such as growth. For example, an IC25 is the estimated concentration of toxicant that would cause a 25 percent reduction in average young per female or growth. IC values may be calculated using a linear interpolation method such as U.S. EPA's Bootstrap Procedure.

Inland Surface Waters

All surface waters of the state that are not the ocean, enclosed bays, or estuaries.

Instantaneous Maximum Effluent Limitation

Highest allowable value for any single grab sample or aliquot (i.e., each grab sample or aliquot is independently compared to the instantaneous maximum limitation).

Instantaneous Minimum Effluent Limitation

Lowest allowable value for any single grab sample or aliquot (i.e., each grab sample or aliquot is independently compared to the instantaneous minimum limitation).

Instream Waste Concentration (IWC)

Concentration of effluent in the receiving water after any dilution credit is applied. The IWC is the inverse of 1 plus the dilution credit, D, or $IWC = 1/(1+D)$, expressed as a percentage (e.g., if D = 9, the IWC is 10 percent). If no dilution credit is granted, the IWC is 100 percent.

Maximum Daily Effluent Limitation (MDEL)

Highest allowable daily discharge of a pollutant, over a calendar day (or 24-hour period). For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day. For toxicity, the MDEL is based on the outcome of the TST and the percent effect at the IWC (applied to the results of any single bioassay). For pollutants with limitations expressed in other units of measurement, the daily discharge is calculated as the arithmetic mean measurement of the pollutant over the day.

Maximum Daily Effluent Target (MDET)

Target based on a single independent toxicity test using the TST used to determine whether a TRE should be conducted. Not meeting the MDET is not a violation of an effluent limitation. The MDET only applies to discharges with no numeric toxicity limitations.

Median

Middle measurement in a data set. The median of a data set is found by first arranging the measurements in order of magnitude (either increasing or decreasing order). If the number of measurements (n) is odd, then the median = $X_{(n+1)/2}$. If n is even, then the median = $(X_{n/2} + X_{(n/2+1)})/2$ (i.e., the midpoint between $n/2$ and $n/2+1$).

Median Monthly Effluent Limitation (MMEL)

Highest allowable median of daily discharges over a calendar month, calculated as the median of all daily discharges measured during a calendar month. For aquatic toxicity, the MMEL is an effluent limitation based on a maximum of three independent toxicity tests analyzed using the TST during a calendar month.

Median Monthly Effluent Target (MMET)

Target based on a maximum of three independent toxicity tests using the TST during a calendar month used to determine whether a TRE should be conducted. Not meeting a MMET is not a violation of an effluent limitation.

Method Detection Limit (MDL)

Minimum concentration of a substance that can be reported with 99 percent confidence that the measured concentration is distinguishable from method blank results, as defined in 40 C.F.R. part 136, Appendix B.

Minimum Level (ML)

Concentration at which the entire analytical system must give a recognizable signal and acceptable calibration point. The ML is the concentration in a sample that is equivalent to the concentration of the lowest calibration standard analyzed by a specific analytical procedure, assuming that all the method specified sample weights, volumes, and processing steps have been followed.

Mixing Zone

Limited volume of receiving water allocated for mixing with a wastewater discharge

where water quality criteria can be exceeded without causing adverse effects to the overall water body.

MMEL Compliance Test

For chronic toxicity monitoring, one of up to two tests used in addition to a routine monitoring test to determine compliance with the chronic toxicity MMEL and MDEL.

MMET Test

For chronic toxicity monitoring, one of up to two tests used in addition to a routine monitoring test to evaluate if the discharge meets the chronic toxicity MMET and MDET.

No Observed Effect Concentration (NOEC)

The NOEC is the highest tested concentration of an effluent or a toxicant at which no adverse effects are observed on the aquatic test organisms at a specific time of observation. It is determined using hypothesis testing.

No Observed Effect level (NOEL)

For compliance determination, the NOEL is equal to IC25 or EC25. If the IC25 or EC25 cannot be statistically determined, the NOEL shall be equal to the NOEC derived using hypothesis testing.

Not Detected (ND)

Sample results less than the laboratory's MDL.

Null Hypothesis

Statement used in statistical testing that has been put forward either because it is believed to be true or because it is to be used as a basis for argument, but has not been proved.

Percent Effect

Value that denotes the difference in response between a test concentration and a control, divided by the mean control response and multiplied by 100.

Persistent Pollutants

Substances for which degradation or decomposition in the environment is nonexistent or very slow.

Pollutant Minimization Program

Program of waste minimization and pollution prevention actions that include, but are not limited to, product substitution, waste stream recycling, alternative waste management methods, and education of the public and businesses. The goal of a Pollutant Minimization Program is to reduce all potential sources of a priority pollutant through pollutant minimization (control) strategies, including pollution prevention measures as appropriate, to maintain the effluent concentration at or below the water quality-based effluent limitation. Pollution prevention measures may be particularly appropriate for persistent bioaccumulative priority pollutants where there is evidence that beneficial uses are being impacted. Cost effectiveness may be considered when establishing the

requirements of a Pollutant Minimization Program. The completion and implementation of a Pollution Prevention Plan, if required pursuant to Water Code section 13263.3(d), is considered to fulfill the Pollutant Minimization Program requirements.

Pollution Prevention

Any action that causes a net reduction in the use or generation of a hazardous substance or other pollutant discharged into water and includes, but is not limited to, input change, operational improvement, production process change, and product reformulation (as defined in Water Code section 13263.3). Pollution prevention does not include actions that merely shift a pollutant in wastewater from one environmental medium to another environmental medium, unless clear environmental benefits of such an approach are identified to the satisfaction of the State Water Resources Control Board or Regional Water Board.

Regulatory Management Decision (RMD)

Decision that represents the maximum allowable error rates and thresholds for toxicity and non-toxicity that would result in an acceptable risk to aquatic life.

Reporting Level (RL)

ML (and its associated analytical method) chosen by the Discharger for reporting and compliance determination from the MLs included in this Order, including an additional factor if applicable as discussed herein. For priority pollutants, the MLs included in this Order correspond to approved analytical methods for reporting a sample result that are selected by the Regional Water Board either from State Implementation Plan (SIP) Appendix 4 in accordance with SIP section 2.4.2 or established in accordance with SIP section 2.4.3. The ML is based on the proper application of method-based analytical procedures for sample preparation and the absence of any matrix interferences. Other factors may be applied to the ML depending on the specific sample preparation steps employed. For example, the treatment typically applied in cases where there are matrix-effects is to dilute the sample or sample aliquot by a factor of ten. In such cases, this additional factor must be applied to the ML in the computation of the RL.

Response

Measured biological effect (e.g., on survival, reproduction, growth) of exposure to a stimulus.

Routine Monitoring

Regular chronic toxicity monitoring required during the order term. Routine monitoring results may trigger MMEL compliance tests or MMET tests. If a violation of the MDEL or MMEL occurs, or if the discharge does not meet the MDET or MMET, routine monitoring also includes one sample collected during the following month (regardless of the regular monitoring frequency), which is used to determine if a TRE is necessary. Routine monitoring does not include surveillance monitoring.

Source of Drinking Water

Any water designated as municipal or domestic supply (MUN) beneficial use.

Standard Deviation (σ)

Measure of variability calculated as follows:

$$\text{Standard deviation} = \sigma = (\Sigma[(x - \mu)^2]/(n - 1))^{0.5}$$

where: x is the observed value

μ is the arithmetic mean of the observed values

n is the number of samples

Surveillance Monitoring

Chronic toxicity monitoring performed using the most sensitive species at an effluent concentration at least double the IWC. Surveillance monitoring results are not for assessing compliance with the chronic toxicity MMEL or MDEL.

Test of Significant Toxicity (TST)

Statistical approach used to analyze aquatic toxicity test data, as described in section III.B.3 of State Water Board's *State Policy for Water Quality Control: Toxicity Provisions*.

Toxicity Reduction Evaluation (TRE)

Study conducted in a step-wise process designed to identify the causative agents of effluent or ambient toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in toxicity. The first steps of the TRE consist of the collection of data relevant to the toxicity, including additional toxicity testing, and an evaluation of facility operations and maintenance practices, and best management practices. A Toxicity Identification Evaluation (TIE) may be required as part of the TRE, if appropriate. A TIE is a set of procedures to identify the specific chemicals responsible for toxicity. These procedures are performed in three phases (characterization, identification, and confirmation) using aquatic organism toxicity tests.

ABBREVIATIONS

°F	degrees Fahrenheit
°C	degrees Celsius
%	Percent
µg/L	Micrograms per liter
µS/cm	Microsiemens per centimeter
1/Blending Event	Once per blending event
1/Discharge	Once per discharge event
1/Day	Once per day
1/Month	Once per month
1/Quarter	Once per quarter
1/Week	Once per week

1/Year	Once per year
2/Month	Two times per month
2/Week	Twice per week
2/Year	Twice per year
3/Week	Three times per week
4/Week	Four times per week
5/Week	Five times per week
AMEL	Average monthly effluent limitation
AWEL	Average weekly effluent limitation
B	Background concentration
BOD₅	Biochemical oxygen demand (5-day @ 20°C)
C	Water quality criterion or objective
C-24	24-hour composite
CBOD₅	Carbonaceous biochemical oxygen demand (5-day @ 20°C)
CFU/100 mL	Colony forming units per 100 milliliters
CIWQS	California Integrated Water Quality System
Continuous	Measured continuously
Continuous/D	Measured continuously, and recorded and reported daily
Continuous/H	Measured continuously, and recorded and reported hourly
CTR	California Toxics Rule
CV	Coefficient of Variation
DMR	Discharge Monitoring Report
DNQ	Detected, but not quantified
DL	Detection level
ECA	Effluent Concentration Allowance
Grab	Grab sample
IWC	Instream Waste Concentration
MDEL	Maximum Daily Effluent Limitation
MDET	Maximum Daily Effluent Target
MDL	Method detection limit
MEC	Maximum effluent concentration
MG	Million gallons

mg/L	Milligrams per liter
mg/L as N	Milligrams per liter as nitrogen
MGD	Million gallons per day
ML	Minimum level
MMEL	Median Monthly Effluent Limitation
MMET	Median Monthly Effluent Target
MPN/100 mL	Most probable number per 100 milliliters
MRP	Monitoring and Reporting Program (Attachment E)
ND	Not detected
NTR	National Toxics Rule
NTU	Nephelometric turbidity units
ppt	Parts per thousand
RL	Reporting level
RPA	Reasonable potential analysis
SIP	<i>Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California</i> (State Implementation Policy)
SMR	Self-Monitoring Report
s.u.	Standard pH units
TIE	Toxicity identification evaluation
TRE	Toxicity reduction evaluation
TSS	Total suspended solids
TST	Test of Significant Toxicity
TUa	Acute toxicity units
TUc	Chronic toxicity units
WDRs	Waste discharge requirements
WQBEL	Water quality-based effluent limitation

ATTACHMENT B – MAP

Figure B-1. Facility and Outfall Locations

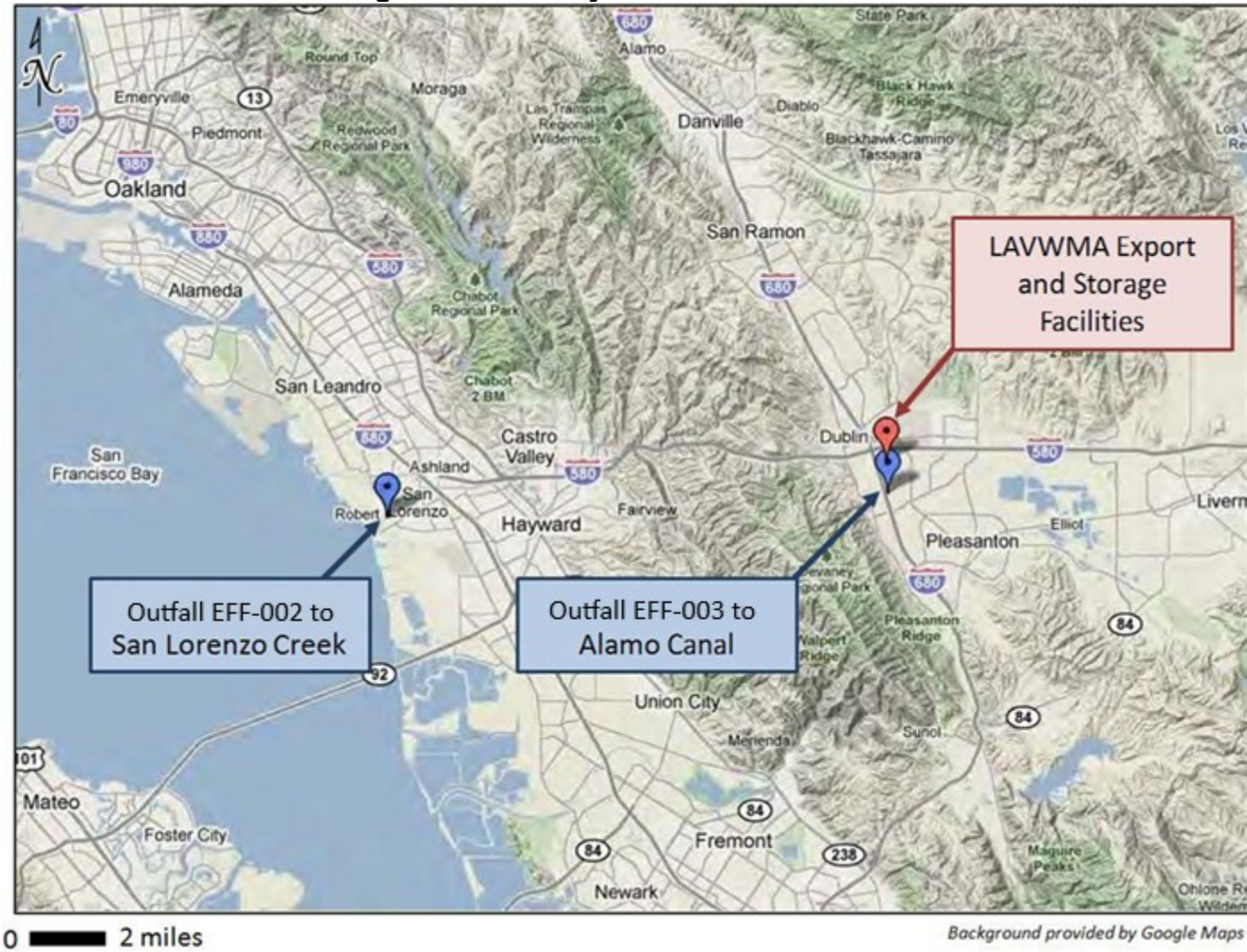


Figure B-2. Aerial View of San Lorenzo Creek Outfall and Surroundings

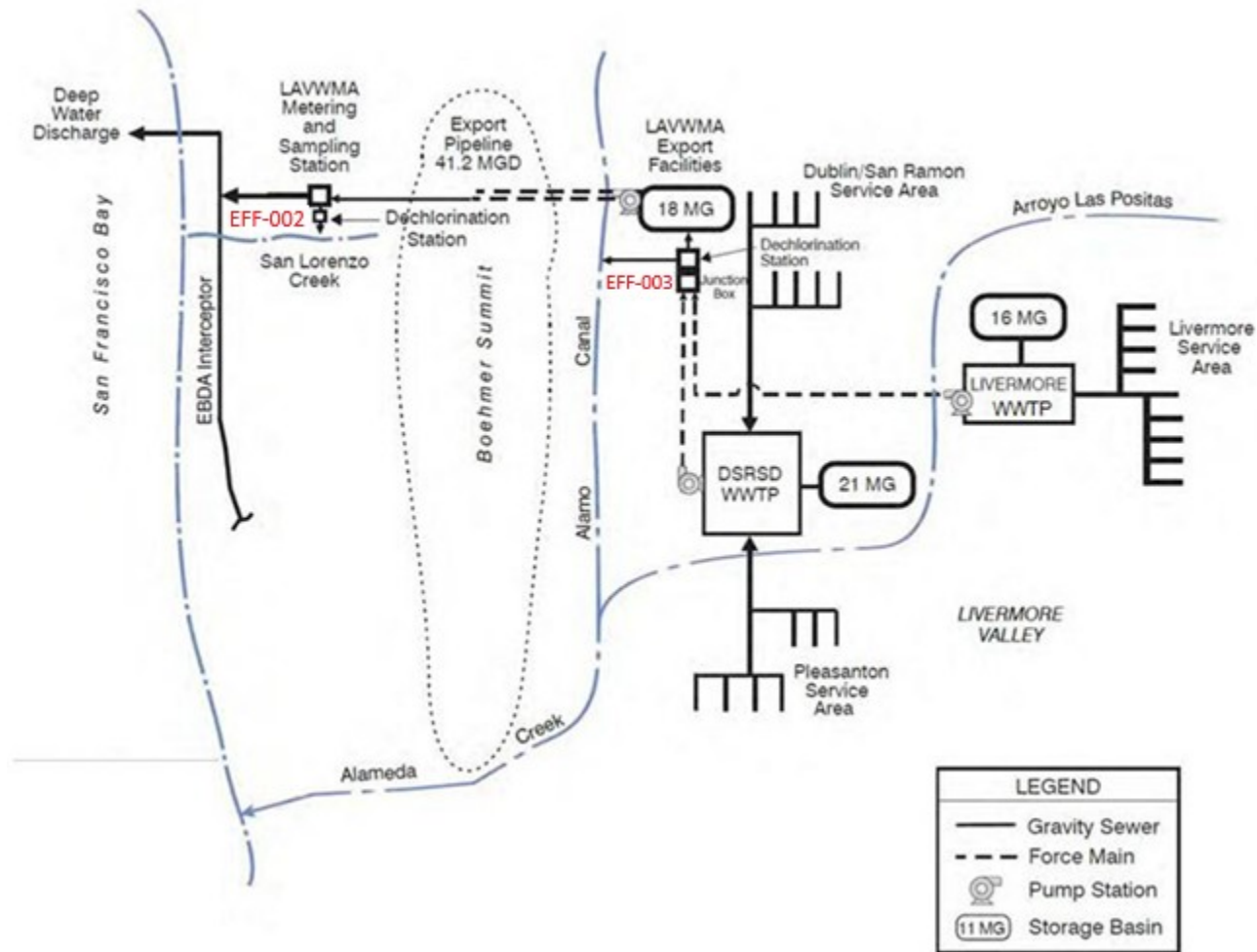


Figure B-3. Aerial View of Alamo Canal Outfall and Surroundings



ATTACHMENT C– PROCESS FLOW DIAGRAM

Figure C-1. Flow Schematic



ATTACHMENT D – STANDARD PROVISIONS

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ATTACHMENT D – STANDARD PROVISIONS

1. STANDARD PROVISIONS – PERMIT COMPLIANCE

1.1. Duty to Comply

- 1.1.1. The Discharger must comply with all of the terms, requirements, and conditions of this Order. Any noncompliance constitutes a violation of the Clean Water Act (CWA) and the California Water Code and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; denial of a permit renewal application; or a combination thereof. (40 C.F.R. § 122.41(a); Wat. Code, §§ 13261, 13263, 13265, 13268, 13000, 13001, 13304, 13350, 13385.)
- 1.1.2. The Discharger shall comply with effluent standards or prohibitions established under CWA section 307(a) for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if this Order has not yet been modified to incorporate the requirement. (40 C.F.R. § 122.41(a)(1).)

1.2. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for a Discharger in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order. (40 C.F.R. § 122.41(c).)

1.3. Duty to Mitigate. The Discharger shall take all reasonable steps to minimize or prevent any discharge in violation of this Order that has a reasonable likelihood of adversely affecting human health or the environment. (40 C.F.R. § 122.41(d).)

1.4. Proper Operation and Maintenance. The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Discharger to achieve compliance with the conditions of this Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems that are installed by a Discharger only when necessary to achieve compliance with the conditions of this Order. (40 C.F.R. § 122.41(e).)

1.5. Property Rights

- 1.5.1. This Order does not convey any property rights of any sort or any exclusive privileges. (40 C.F.R. § 122.41(g).)
- 1.5.2. The issuance of this Order does not authorize any injury to persons or property or invasion of other private rights, or any infringement of state or local law or regulations. (40 C.F.R. § 122.5(c).)

1.6. Inspection and Entry. The Discharger shall allow the Regional Water Board, State Water Board, U.S. EPA, and/or their authorized representatives (including an authorized contractor acting as their representative), upon the presentation of credentials and other documents, as may be required by law, to (33 U.S.C. § 1318(a)(4)(B); 40 C.F.R. § 122.41(i); Wat. Code, §§ 13267, 13383):

- 1.6.1. Enter upon the Discharger's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order (33 U.S.C. § 1318(a)(4)(B)(i); 40 C.F.R. § 122.41(i)(1); Wat. Code, §§ 13267, 13383);
- 1.6.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order (33 U.S.C. § 1318(a)(4)(B)(ii); 40 C.F.R. § 122.41(i)(2); Wat. Code, §§ 13267, 13383);
- 1.6.3. Inspect and photograph, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order (33 U.S.C. § 1318(a)(4)(B)(ii); 40 C.F.R. § 122.41(i)(3); Wat. Code, §§ 13267, 13383); and
- 1.6.4. Sample or monitor, at reasonable times, for the purposes of ensuring Order compliance or as otherwise authorized by the CWA or the Water Code, any substances or parameters at any location. (33 U.S.C. § 1318(a)(4)(B); 40 C.F.R. § 122.41(i)(4); Wat. Code, §§ 13267, 13383.)

1.7. Bypass

1.7.1. Definitions

- 1.7.1.1. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility. (40 C.F.R. § 122.41(m)(1)(i).)
- 1.7.1.2. "Severe property damage" means substantial physical damage to property; damage to the treatment facilities, which causes them to become inoperable; or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production. (40 C.F.R. § 122.41(m)(1)(ii).)
- 1.7.2. **Bypass not exceeding limitations.** The Discharger may allow any bypass to occur that does not cause exceedances of effluent limitations, but only if it is for essential maintenance to ensure efficient operation. These bypasses are not subject to the provisions listed in Standard Provisions – Permit Compliance sections 1.7.3, 1.7.4, and 1.7.5 below. (40 C.F.R. § 122.41(m)(2).)

- 1.7.3. **Prohibition of bypass.** Bypass is prohibited, and the Regional Water Board may take enforcement action against a Discharger for bypass, unless (40 C.F.R. § 122.41(m)(4)(i)):
- 1.7.3.1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage (40 C.F.R. § 122.41(m)(4)(i)(A));
- 1.7.3.2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that occurred during normal periods of equipment downtime or preventive maintenance (40 C.F.R. § 122.41(m)(4)(i)(B)); and
- 1.7.3.3. The Discharger submitted notice to the Regional Water Board as required under Standard Provisions – Permit Compliance section 1.7.5 below. (40 C.F.R. § 122.41(m)(4)(i)(C).)
- 1.7.4. **Approval.** The Regional Water Board may approve an anticipated bypass, after considering its adverse effects, if the Regional Water Board determines that it will meet the three conditions listed in Standard Provisions – Permit Compliance section 1.7.3 above. (40 C.F.R. § 122.41(m)(4)(ii).)
- 1.7.5. **Notice**
- 1.7.5.1. **Anticipated bypass.** If the Discharger knows in advance of the need for a bypass, it shall submit prior notice, if possible, at least 10 days before the date of the bypass. The notice shall be sent to the Regional Water Board. As of December 21, 2028, a notice shall also be submitted electronically to the initial recipient defined in Standard Provisions – Reporting section 5.10 below. Notices shall comply with 40 C.F.R. part 3, 40 C.F.R. section 122.22, and 40 C.F.R. part 127. (40 C.F.R. § 122.41(m)(3)(i).)
- 1.7.5.2. **Unanticipated bypass.** The Discharger shall submit a notice of an unanticipated bypass as required in Standard Provisions – Reporting section 5.5 below (24-hour notice). The notice shall be sent to the Regional Water Board. As of December 21, 2028, a notice shall also be submitted electronically to the initial recipient defined in Standard Provisions – Reporting section 5.10 below. Notices shall comply with 40 C.F.R. part 3, 40 C.F.R. section 122.22, and 40 C.F.R. part 127. (40 C.F.R. § 122.41(m)(3)(ii).)
- 1.8. **Upset.** Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the Discharger. An upset does not include noncompliance to the extent caused by operational error,

improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation. (40 C.F.R. § 122.41(n)(1).)

- 1.8.1. **Effect of an upset.** An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of Standard Provisions – Permit Compliance section 1.8.2 below are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review. (40 C.F.R. § 122.41(n)(2).)
- 1.8.2. **Conditions necessary for a demonstration of upset.** A Discharger who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence that (40 C.F.R. § 122.41(n)(3)):
 - 1.8.2.1. An upset occurred and that the Discharger can identify the cause(s) of the upset (40 C.F.R. § 122.41(n)(3)(i));
 - 1.8.2.2. The permitted facility was, at the time, being properly operated (40 C.F.R. § 122.41(n)(3)(ii));
 - 1.8.2.3. The Discharger submitted notice of the upset as required in Standard Provisions – Reporting section 5.5.2.2 below (24-hour notice) (40 C.F.R. § 122.41(n)(3)(iii)); and
 - 1.8.2.4. The Discharger complied with any remedial measures required under Standard Provisions – Permit Compliance section 1.3 above. (40 C.F.R. § 122.41(n)(3)(iv).)
- 1.8.3. **Burden of proof.** In any enforcement proceeding, the Discharger seeking to establish the occurrence of an upset has the burden of proof. (40 C.F.R. § 122.41(n)(4).)

2. STANDARD PROVISIONS – PERMIT ACTION

- 2.1. **General.** This Order may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Discharger for modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any Order condition. (40 C.F.R. § 122.41(f).)
- 2.2. **Duty to Reapply.** If the Discharger wishes to continue an activity regulated by this Order after the expiration date of this Order, the Discharger must apply for and obtain a new permit. (40 C.F.R. § 122.41(b).)

2.3. Transfers. This Order is not transferable to any person except after notice to the Regional Water Board. The Regional Water Board may require modification or revocation and reissuance of the Order to change the name of the Discharger and incorporate such other requirements as may be necessary under the CWA and Water Code. (40 C.F.R. §§ 122.41(l)(3), 122.61.)

3. STANDARD PROVISIONS – MONITORING

- 3.1.** Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. (40 C.F.R. § 122.41(j)(1).)
- 3.2.** Monitoring must be conducted according to test procedures approved under 40 C.F.R. part 136 for the analyses of pollutants unless another method is required under 40 C.F.R. chapter 1, subchapter N. Monitoring must be conducted according to sufficiently sensitive test methods approved under 40 C.F.R. part 136 for the analysis of pollutants or pollutant parameters or as required under 40 C.F.R. chapter 1, subchapter N. For the purposes of this paragraph, a method is sufficiently sensitive when:
- 3.2.1.** The method minimum level (ML) is at or below the level of the most stringent effluent limitation established in the permit for the measured pollutant or pollutant parameter, and either the method ML is at or below the level of the most stringent applicable water quality criterion for the measured pollutant or pollutant parameter or the method ML is above the applicable water quality criterion but the amount of the pollutant or pollutant parameter in the facility's discharge is high enough that the method detects and quantifies the level of the pollutant or pollutant parameter in the discharge; or
- 3.2.2.** The method has the lowest ML of the analytical methods approved under 40 C.F.R. part 136 or required under 40 C.F.R. chapter 1, subchapter N, for the measured pollutant or pollutant parameter.

In the case of pollutants or pollutant parameters for which there are no approved methods under 40 C.F.R. part 136 or otherwise required under 40 C.F.R. chapter 1, subchapter N, monitoring must be conducted according to a test procedure specified in this Order for such pollutants or pollutant parameters. (40 C.F.R. §§ 122.21(e)(3), 122.41(j)(4), 122.44(i)(1)(iv).)

4. STANDARD PROVISIONS – RECORDS

- 4.1.** The Discharger shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the application for this Order, for a period of at least three (3) years from the date of the sample, measurement, report, or application. This period may be extended by request of the Regional Water Board Executive Officer at any time. (40 C.F.R. § 122.41(j)(2).)

4.2. Records of monitoring information shall include:

- 4.2.1. The date, exact place, and time of sampling or measurements (40 C.F.R. § 122.41(j)(3)(i));
- 4.2.2. The individual(s) who performed the sampling or measurements (40 C.F.R. § 122.41(j)(3)(ii));
- 4.2.3. The date(s) analyses were performed (40 C.F.R. § 122.41(j)(3)(iii));
- 4.2.4. The individual(s) who performed the analyses (40 C.F.R. § 122.41(j)(3)(iv));
- 4.2.5. The analytical techniques or methods used (40 C.F.R. § 122.41(j)(3)(v)); and
- 4.2.6. The results of such analyses. (40 C.F.R. § 122.41(j)(3)(vi).)

4.3. Claims of confidentiality for the following information will be denied (40 C.F.R. § 122.7(b)):

- 4.3.1. The name and address of any permit applicant or Discharger (40 C.F.R. § 122.7(b)(1)); and
- 4.3.2. Permit applications and attachments, permits, and effluent data. (40 C.F.R. § 122.7(b)(2).)

5. STANDARD PROVISIONS – REPORTING

5.1. Duty to Provide Information. The Discharger shall furnish to the Regional Water Board, State Water Board, or U.S. EPA within a reasonable time, any information that the Regional Water Board, State Water Board, or U.S. EPA may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order or to determine compliance with this Order. Upon request, the Discharger shall also furnish to the Regional Water Board, State Water Board, or U.S. EPA copies of records required to be kept by this Order. (40 C.F.R. § 122.41(h); Wat. Code, §§ 13267, 13383.)

5.2. Signatory and Certification Requirements

- 5.2.1. All applications, reports, or information submitted to the Regional Water Board, State Water Board, and/or U.S. EPA shall be signed and certified in accordance with Standard Provisions – Reporting sections 5.2.2, 5.2.3, 5.2.4, 5.2.5, and 5.2.6 below. (40 C.F.R. § 122.41(k).)
- 5.2.2. For a corporation, all permit applications shall be signed by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (1) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (2) the

manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to ensure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. (40 C.F.R. § 122.22(a)(1).)

For a partnership or sole proprietorship, all permit applications shall be signed by a general partner or the proprietor, respectively. (40 C.F.R. § 122.22(a)(2).)

For a municipal, state, federal, or other public agency, all permit applications shall be signed by either a principal executive officer or ranking elected official. For purposes of this provision, a principal executive officer of a federal agency includes (1) the chief executive officer of the agency, or (2) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of U.S. EPA). (40 C.F.R. § 122.22(a)(3).)

- 5.2.3. All reports required by this Order and other information requested by the Regional Water Board, State Water Board, or U.S. EPA shall be signed by a person described in Standard Provisions – Reporting section 5.2.2 above, or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - 5.2.3.1. The authorization is made in writing by a person described in Standard Provisions – Reporting section 5.2.2 above (40 C.F.R. § 122.22(b)(1));
 - 5.2.3.2. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) (40 C.F.R. § 122.22(b)(2)); and
 - 5.2.3.3. The written authorization is submitted to the Regional Water Board and State Water Board. (40 C.F.R. § 122.22(b)(3).)
- 5.2.4. If an authorization under Standard Provisions – Reporting section 5.2.3 above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Standard Provisions – Reporting section 5.2.3 above must be

submitted to the Regional Water Board and State Water Board prior to or together with any reports, information, or applications to be signed by an authorized representative. (40 C.F.R. § 122.22(c).)

- 5.2.5. Any person signing a document under Standard Provisions – Reporting section 5.2.2 or 5.2.3 above shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.” (40 C.F.R. § 122.22(d).)

- 5.2.6. Any person providing the electronic signature for documents described in Standard Provisions – Reporting sections 5.2.1, 5.2.2, or 5.2.3 that are submitted electronically shall meet all relevant requirements of Standard Provisions – Reporting section 5.2, and shall ensure that all relevant requirements of 40 C.F.R. part 3 (Cross-Media Electronic Reporting) and 40 C.F.R. part 127 (NPDES Electronic Reporting Requirements) are met for that submission. (40 C.F.R. § 122.22(e).)

5.3. Monitoring Reports

- 5.3.1. Monitoring results shall be reported at the intervals specified in the Monitoring and Reporting Program (Attachment E) in this Order. (40 C.F.R. § 122.41(l)(4).)
- 5.3.2. Monitoring results must be reported on a Discharge Monitoring Report (DMR) form or forms provided or specified by the Regional Water Board or State Water Board. All reports and forms must be submitted electronically to the initial recipient defined in Standard Provisions – Reporting section 5.10 and comply with 40 C.F.R. part 3, 40 C.F.R. section 122.22, and 40 C.F.R. part 127. (40 C.F.R. § 122.41(l)(4)(i).)
- 5.3.3. If the Discharger monitors any pollutant more frequently than required by this Order using test procedures approved under 40 C.F.R. part 136, or another method required for an industry-specific waste stream under 40 C.F.R. chapter 1, subchapter N, the results of such monitoring shall be included in the calculation and reporting of the data submitted in the DMR or reporting form specified by the Regional Water Board or State Water Board. (40 C.F.R. § 122.41(l)(4)(ii).)

- 5.3.4. Calculations for all limitations that require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this Order. (40 C.F.R. § 122.41(l)(4)(iii).)

5.4. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Order shall be submitted no later than 14 days following each schedule date. (40 C.F.R. § 122.41(l)(5).)

5.5. Twenty-Four Hour Reporting

- 5.5.1. The Discharger shall report any noncompliance that may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the Discharger becomes aware of the circumstances. A written report shall also be provided within five (5) days of the time the Discharger becomes aware of the circumstances. The report shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and, if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

For noncompliance related to combined sewer spills, sanitary sewer spills, or bypass events, these reports must include the data described above (with the exception of time of discovery) as well as the type of event (i.e., combined sewer spill, sanitary sewer spill, or bypass event), type of overflow structure (e.g., manhole, combined sewer overflow outfall), discharge volume untreated by the treatment works treating domestic sewage, types of human health and environmental impacts of the event, and whether the noncompliance was related to wet weather.

As of December 21, 2028, all reports related to combined sewer spills, sanitary sewer spills, or bypass events must be submitted to the Regional Water Board and must be submitted electronically to the initial recipient defined in Standard Provisions – Reporting section 5.10. The reports shall comply with 40 C.F.R. part 3, 40 C.F.R. section 122.22, and 40 C.F.R. part 127. The Regional Water Board may also require the Discharger to electronically submit reports not related to combined sewer spills, sanitary sewer spills, or bypass events under this section. (40 C.F.R. § 122.41(l)(6)(i).)

- 5.5.2. The following shall be included as information that must be reported within 24 hours:

- 5.5.2.1. Any unanticipated bypass that exceeds any effluent limitation in this Order. (40 C.F.R. § 122.41(l)(6)(ii)(A).)
- 5.5.2.2. Any upset that exceeds any effluent limitation in this Order. (40 C.F.R. § 122.41(l)(6)(ii)(B).)

5.5.3. The Regional Water Board may waive the above required written report on a case-by-case basis if an oral report has been received within 24 hours. (40 C.F.R. § 122.41(l)(6)(ii)(B).)

5.6. Planned Changes. The Discharger shall give notice to the Regional Water Board as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required under this provision only when (40 C.F.R. § 122.41(l)(1)):

5.6.1. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 C.F.R. section 122.29(b) (40 C.F.R. § 122.41(l)(1)(i)); or

5.6.2. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants that are not subject to effluent limitations in this Order unless the discharge is an existing manufacturing, commercial, mining, or silvicultural discharge as referenced in 40 C.F.R. section 122.42(a). (40 C.F.R. § 122.41(l)(1)(ii).) If the discharge is an existing manufacturing, commercial, mining, or silvicultural discharge as referenced in 40 C.F.R. section 122.42(a), this notification applies to pollutants that are subject neither to effluent limitations in this Order nor to notification requirements under 40 C.F.R. section 122.42(a)(1) (see Additional Provisions – Notification Levels section 7.1.1). (40 C.F.R. § 122.41(l)(1)(ii).)

5.7. Anticipated Noncompliance. The Discharger shall give advance notice to the Regional Water Board of any planned changes in the permitted facility or activity that may result in noncompliance with this Order's requirements. (40 C.F.R. § 122.41(l)(2).)

5.8. Other Noncompliance. The Discharger shall report all instances of noncompliance not reported under Standard Provisions – Reporting sections 5.3, 5.4, and 5.5 above at the time monitoring reports are submitted. The reports shall contain the information listed in Standard Provision – Reporting section 5.5 above. For noncompliance related to combined sewer spills, sanitary sewer spills, or bypass events, these reports shall contain the information described in Standard Provision – Reporting section 5.5 and the applicable required data in appendix A to 40 C.F.R. part 127. The Regional Water Board may also require the Discharger to electronically submit reports not related to combined sewer spills, sanitary sewer spills, or bypass events under this section. (40 C.F.R. § 122.41(l)(7).)

5.9. Other Information. When the Discharger becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Regional Water Board, State Water Board, or U.S. EPA, the Discharger shall promptly submit such facts or information. (40 C.F.R. § 122.41(l)(8).)

5.10. Initial Recipient for Electronic Reporting Data. The owner, operator, or duly authorized representative is required to electronically submit NPDES information specified in appendix A to 40 C.F.R. part 127 to the initial recipient defined in 40 C.F.R. § 7.2(b). U.S. EPA will identify and publish the list of initial recipients on its website and in the Federal Register, by state and by NPDES data group [see 40 C.F.R. § 127.2(c)]. U.S. EPA will update and maintain this list. (40 C.F.R. § 122.41(l)(9).)

6. STANDARD PROVISIONS – ENFORCEMENT

6.1. The Regional Water Board is authorized to enforce the terms of this permit under several provisions of the Water Code, including, but not limited to, Water Code sections 13268, 13385, 13386, and 13387.

7. ADDITIONAL PROVISIONS – NOTIFICATION LEVELS

7.1. Non-Municipal Facilities. Existing manufacturing, commercial, mining, and silvicultural Dischargers shall notify the Regional Water Board as soon as they know or have reason to believe (40 C.F.R. § 122.42(a)):

7.1.1. That any activity has occurred or will occur that would result in the discharge, on a routine or frequent basis, of any toxic pollutant that is not limited in this Order, if that discharge will exceed the highest of the following “notification levels” (40 C.F.R. § 122.42(a)(1)):

7.1.1.1. 100 micrograms per liter (µg/L) (40 C.F.R. § 122.42(a)(1)(i));

7.1.1.2. 200 µg/L for acrolein and acrylonitrile; 500 µg/L for 2,4 dinitrophenol and 2-methyl 4,6 dinitrophenol; and 1 milligram per liter (mg/L) for antimony (40 C.F.R. § 122.42(a)(1)(ii));

7.1.1.3. Five (5) times the maximum concentration reported for that pollutant in the Report of Waste Discharge (40 C.F.R. § 122.42(a)(1)(iii)); or

7.1.1.4. The level established by the Regional Water Board in accordance with 40 C.F.R. section 122.44(f). (40 C.F.R. § 122.42(a)(1)(iv).)

7.1.2. That any activity has occurred or will occur that would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant that is not limited in this Order, if that discharge will exceed the highest of the following “notification levels” (40 C.F.R. § 122.42(a)(2)):

7.1.2.1. 500 micrograms per liter (µg/L) (40 C.F.R. § 122.42(a)(2)(i));

7.1.2.2. 1 milligram per liter (mg/L) for antimony (40 C.F.R. § 122.42(a)(2)(ii));

- 7.1.2.3. Ten (10) times the maximum concentration reported for that pollutant in the Report of Waste Discharge (40 C.F.R. § 122.42(a)(2)(iii)); or
- 7.1.2.4. The level established by the Regional Water Board in accordance with 40 C.F.R. section 122.44(f). (40 C.F.R. § 122.42(a)(2)(iv).)

7.2 Publicly Owned Treatment Works (POTWs)

- 7.2.1. All POTWs shall provide adequate notice to the Regional Water Board of any new introduction of pollutants into the POTW from an indirect discharger that would be subject to CWA sections 301 or 306 if it were directly discharging those pollutants (40 C.F.R. § 122.42(b)(1)).
- 7.2.2. All POTWs shall provide adequate notice to the Regional Water Board of any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of adoption of this Order. (40 C.F.R. § 122.42(b)(2).)
- 7.2.3. Adequate notice shall include information on the quality and quantity of effluent introduced into the POTW as well as any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW. (40 C.F.R. § 122.42(b)(3).)

ATTACHMENT E – MONITORING AND REPORTING PROGRAM

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ATTACHMENT E – MONITORING AND REPORTING PROGRAM

Clean Water Act (CWA) section 308 and Code of Federal Regulations, Title 40 (40 C.F.R.), sections 122.41(h), (j)-(l), 122.44(i), and 122.48 require that all NPDES permits specify monitoring and reporting requirements. Water Code section 13383 also authorizes the Regional Water Board to establish monitoring, inspection, entry, reporting, and recordkeeping requirements. This Monitoring and Reporting Program (MRP) establishes monitoring, reporting, and recordkeeping requirements that implement the federal and State laws and regulations.

1. GENERAL MONITORING PROVISIONS

- 1.1. The Discharger shall comply with this MRP. The Executive Officer may amend this MRP pursuant to 40 C.F.R. section 122.63. If any discrepancies exist between this MRP and the “Regional Standard Provisions, and Monitoring and Reporting Requirements (Supplement to Attachment D) for NPDES Wastewater Discharge Permits” (Attachment G), this MRP shall prevail.
- 1.2. The Discharger shall conduct all monitoring in accordance with Attachment D section 3, as supplemented by Attachment G. Equivalent test methods must be more sensitive than those specified in 40 C.F.R. section 136 and must be specified in this Order.
- 1.3. For the analysis of monitoring samples, the Discharger shall use laboratories certified by the State Water Resources Control Board (State Water Board) in accordance with Water Code section 13176 and shall obtain quality assurance/quality control data with laboratory reports. For any onsite field tests (e.g., turbidity, pH, temperature, dissolved oxygen, conductivity, disinfectant residual) analyzed by a noncertified laboratory, the Discharger shall implement a Quality Assurance-Quality Control Program. The Discharger shall keep a manual onsite containing the steps followed in this program and shall demonstrate sufficient capability to adequately perform these field tests (e.g., qualified and trained employees, properly calibrated and maintained field instruments). The program shall conform to United States Environmental Protection Agency (U.S. EPA) guidelines or other approved procedures.
- 1.4. The Discharger shall ensure that the results of the Discharge Monitoring Report-Quality Assurance (DMR-QA) Study or most recent Water Pollution Performance Evaluation Study are submitted annually to the State Water Board to the DMR-QA Officer via email at QualityAssurance@waterboards.ca.gov, or at the following address:

State Water Resources Control Board;
Quality Assurance Program Officer;
Office of Information Management and Analysis;
1001 I Street
Sacramento, CA 95814

2. MONITORING LOCATIONS

The Discharger shall establish the following monitoring locations to demonstrate compliance with the effluent limitations, discharge specifications, and other requirements of this Order:

Table E-1. Monitoring Locations

Discharge Point	Monitoring Location	Monitoring Location Description
Effluent (San Leandro Sample Station)	EFF-001	A point after effluent from the Dublin San Ramon Services District Wastewater Treatment Plant and the City of Livermore Water Reclamation Plant effluent are combined and before release to the EBDA pipeline (Discharge Point 001).
Effluent (San Lorenzo Creek)	EFF-002	A point at which dechlorination has taken place, just prior to discharge to San Lorenzo Creek (Discharge Point 002).
Effluent (Alamo Canal)	EFF-003	A point at which dechlorination has taken place, just prior to discharge to Alamo Canal (Discharge Point 003).
Receiving Water (San Lorenzo Creek)	RSW-002U	A point in San Lorenzo Creek 100 feet upstream of Discharge Point 002 or, if access is limited, at the first accessible point upstream of Discharge Point 002.
Receiving Water (San Lorenzo Creek)	RSW-002D	A point in San Lorenzo Creek 100 feet downstream of Discharge Point 002 or, if access is limited, at the first accessible point downstream of Discharge Point 002.
Receiving Water (Alamo Canal)	RSW-003U	A point in Alamo Canal 100 feet upstream of Discharge Point 003 or, if access is limited, at the first accessible point upstream of Discharge Point 003.
Receiving Water (Alamo Canal)	RSW-003D	A point in Alamo Canal 100 feet downstream of Discharge Point 003 or, if access is limited, at the first accessible point downstream of Discharge Point 003.

3. EFFLUENT MONITORING

3.1. Wet Weather Discharges

When discharging to San Lorenzo Creek during wet weather, the Discharger shall monitor effluent at Monitoring Location EFF-002 as follows. When discharging to Alamo Canal during wet weather, the Discharger shall monitor effluent at Monitoring Location EFF-003 as follows:

Table E-2. Effluent Monitoring—Wet Weather

Parameter	Unit	Sample Type	Minimum Sampling Frequency
Carbonaceous Biochemical Oxygen Demand (5-day @ 20°C) (CBOD ₅)	mg/L	C-24 ^[1]	1/Discharge ^[2]
Total Suspended Solids (TSS)	mg/L	C-24 ^[1]	1/Discharge ^[2]
pH	standard units	Grab	1/Discharge ^[2]
Lead, Total	µg/L	Grab	1/Discharge ^[2]

Parameter	Unit	Sample Type	Minimum Sampling Frequency
<i>Escherichia</i> Coliform Bacteria	CFU/100 mL ^[3]	Grab	1/Discharge ^[2]
Chlorine, Total Residual	mg/L	Continuous or Grab	Continuous/D or Once every two hours during discharge ^{[4], [5]}
Discharge Duration	hours or minutes	Continuous	1/Discharge ^[2]
Discharge Volume	gallons	Continuous	1/Discharge ^[2]

Footnotes:

- ^[1] If the discharge is expected to last less than 24 hours, the Discharger may take a grab sample or a composite sample by manually or mechanically compositing samples once every two hours for the discharge duration.
- ^[2] 1/Discharge is defined as once per discharge event. For purposes of this Order, a discharge event extends from the time a discharge commences to the time the discharge ceases for greater than or equal to 24 hours.
- ^[3] Results may be reported as either MPN/100 mL if the laboratory method used provides results in MPN/100 mL or CFU/100 mL if the laboratory method used provides results in CFU/100 mL.
- ^[4] The Discharger shall monitor continuously or by grab samples. If monitoring continuously, total residual chlorine concentrations shall be recorded at a frequency of not less than every 5 minutes. The minimum level for total residual chlorine analysis shall be no greater than 0.05 mg/L. To document compliance with the minimum level, the Discharger shall calibrate continuous total residual chlorine analyzers against grab samples as frequently as necessary to maintain accurate control and reliable operation. If monitoring by grab samples, the Discharger shall collect at least one sample per discharge event and continue sampling at least once every two hours for longer duration discharges.
- ^[5] If monitoring continuously, to evaluate compliance with the one-hour average effluent limitation, the Discharger shall consider all readings recorded within each one-hour period during the discharge. If monitoring using grab samples, to evaluate compliance with the one-hour average effluent limitation, the Discharger shall consider all samples taken within each two-hour period during the discharge. The monitoring period shall begin within the first hour of the discharge. The Discharger shall calculate arithmetic means for each complete one- or two-hour discharge period using all the readings during that period. The Discharger shall report through data upload to CIWQS the maximum one- or two-hour arithmetic mean for each calendar day and any other one- or two-hour arithmetic mean values that exceed the effluent limitation. The Discharger shall retain documentation of chlorine results for at least three years.

The Discharger may elect to use a continuous on-line monitoring system for measuring or determining that a residual dechlorinating agent (e.g., sodium bisulfite) is present. Such a monitoring system may be used to prove that anomalous residual chlorine exceedances are false positives and are not valid total residual chlorine detections because it is chemically improbable to have chlorine present in the presence of a dechlorinating agent. If convincing evidence exists to demonstrate that chlorine residual exceedances are false positives, the exceedances shall not be violations of this Order's total residual chlorine effluent limit.

3.2. Discharge Exercises

When discharging to San Lorenzo Creek during discharge exercises, the Discharger shall monitor plant effluent at Monitoring Location EFF-002 as follows. When discharging to Alamo Canal during discharge exercises, the Discharger shall monitor effluent at Monitoring Location EFF-003 as follows:

Table E-3. Effluent Monitoring—Discharge Exercises

Parameter	Unit	Sample Type	Minimum Sampling Frequency
<i>Escherichia</i> Coliform Bacteria	CFU/100 mL ^[1]	Grab	1/Discharge ^[2]
Chlorine, Total Residual	mg/L	Grab	Continuous/D or Once every two hours during discharge ^{[3], [4]}
Discharge Duration	hours or minutes	Continuous	1/Discharge ^[2]

Parameter	Unit	Sample Type	Minimum Sampling Frequency
Discharge Volume	gallons	Continuous	1/Discharge ^[2]

Footnotes:

- ^[1] Results may be reported as either MPN/100 mL if the laboratory method used provides results in MPN/100 mL or CFU/100 mL if the laboratory method used provides results in CFU/100 mL.
- ^[2] 1/Discharge is defined as once per discharge event. For the purposes of this Order, a discharge event extends from the time a discharge commences to the time the discharge ceases for greater than or equal to 24 hours.
- ^[3] The Discharger shall monitor continuously or by grab samples. If monitoring continuously, total residual chlorine concentrations shall be recorded at a frequency of not less than every 5 minutes. The minimum level for total residual chlorine analysis shall be no greater than 0.05 mg/L. To document compliance with the minimum level, the Discharger shall calibrate continuous total residual chlorine analyzers against grab samples as frequently as necessary to maintain accurate control and reliable operation. If monitoring by grab samples, the Discharger shall collect at least one sample per discharge event and continue sampling at least once every two hours for longer duration discharges.
- ^[4] If monitoring continuously, to evaluate compliance with the one-hour average effluent limitation, the Discharger shall consider all readings recorded within each one-hour period during the discharge. If monitoring using grab samples, to evaluate compliance with the one-hour average effluent limitation, the Discharger shall consider all samples taken within each two-hour period during the discharge. The monitoring period shall begin within the first hour of the discharge. The Discharger shall calculate arithmetic means for each complete one- or two-hour discharge period using all the readings during that period. The Discharger shall report through data upload to CIWQS the maximum one- or two-hour arithmetic mean for each calendar day and any other one- or two-hour arithmetic mean values that exceed the effluent limitation. The Discharger shall retain documentation of chlorine results for at least three years.

The Discharger may elect to use a continuous on-line monitoring system for measuring or determining that a residual dechlorinating agent (e.g., sodium bisulfite) is present. Such a monitoring system may be used to prove that anomalous residual chlorine exceedances are false positives and are not valid total residual chlorine detections because it is chemically improbable to have chlorine present in the presence of a dechlorinating agent. If convincing evidence exists to demonstrate that chlorine residual exceedances are false positives, the exceedances shall not be violations of this Order's total residual chlorine effluent limit.

3.3. Effluent Characterization Study

The Discharger shall monitor plant effluent between November 1 and April 30 at Monitoring Location EFF-001 as follows:

Table E-4. Effluent Monitoring—Characterization Study

Parameter	Unit	Sample Type	Minimum Sampling Frequency
pH	standard units	Grab	1/Year ^[1]
Temperature	°C	Grab	1/Year ^[1]
Ammonia, Total	mg/L as N	C-24 or Grab	1/Year ^[1]
Priority Pollutants ^[2]	µg/L	C-24 or Grab ^[3]	Once

Footnotes:

- ^[1] pH, temperature, and ammonia sampling shall occur on the same day to allow for the calculation of the un-ionized ammonia fraction.
- ^[2] The Discharger shall monitor for the pollutants listed in Attachment G, Table B, except for those pollutants for which there are no water quality criteria (see Fact Sheet Table F-7).
- ^[3] The Discharger shall collect C-24 samples for metals.

4. RECEIVING WATER MONITORING REQUIREMENTS

4.1. Discharge Events

When discharging to San Lorenzo Creek, the Discharger shall monitor receiving waters at Monitoring Location RSW-002D as follows. When discharging to Alamo

Canal, the Discharger shall monitor receiving waters at Monitoring Location RSW-003D as follows:

Table E-5. Receiving Water Monitoring—Discharge Events

Parameter	Units	Sample Type	Minimum Sampling Frequency
Standard Observations ^[1]	-	-	1/Discharge ^[2]
pH	standard units	Grab	Once ^[3]
Temperature	°C	Grab	Once ^[3]
Salinity	ppt	Grab	Once ^[3]
Ammonia, Total	mg/L as N	Grab	Once ^[3]
Dissolved Oxygen	mg/L	Grab	Once

Footnotes:

- ^[1] Standard observations are set forth in Attachment G section 3.2.1.
^[2] 1/Discharge is defined as once per discharge event. For the purposes of this Order, a discharge event extends from the time a discharge commences to the time the discharge ceases for greater than or equal to 24 hours.
^[3] pH, temperature, salinity, and ammonia sampling shall occur on the same day to allow for the calculation of the un-ionized ammonia fraction.

4.2. Receiving Water Characterization Study

The Discharger shall monitor receiving waters between November 1 and April 30 at Monitoring Locations RSW-002U and RSW-003U as follows:

Table E-6. Receiving Water Monitoring—Characterization Study

Parameter	Units	Sample Type	Minimum Sampling Frequency
pH	standard units	Grab	Once
Temperature ^[1]	°C	Grab	Once
Hardness ^[2]	mg/L as CaCO ₃	Grab	Twice
Salinity ^[2]	ppt	Grab	Twice
Dissolved Oxygen	mg/L	Grab	Once
Priority Pollutants ^[3]	µg/L	Grab	Once

Footnotes:

- ^[1] Upstream temperature sampling shall occur on the same day as downstream temperature sampling (see Table E-5) to assess any potential change in ambient temperature caused by the discharge.
^[2] Hardness and salinity sampling shall occur on the same day.
^[3] The Discharger shall monitor for the pollutants listed in Attachment G, Table B, except for those pollutants for which there are no water quality criteria (see Fact Sheet Table F-7).

The Discharger shall continue to participate in the Regional Monitoring Program (RMP), which collects data on pollutants and toxicity in San Francisco Bay water, sediment, and biota. The Discharger shall also provide supplemental funding to the RMP to support additional studies for constituents of emerging concern. The Discharger shall, either individually or in collaboration with other dischargers, submit

or cause to submit a report each year that indicates the status of its RMP payment. The report shall be due on the same day as the letters certifying the Discharger's annual payment in support of RMP receiving water monitoring (currently February 1 each year). The Discharger may satisfy this provision with the information in the report submitted under NPDES Permit CA0037869 (for the EBDA common outfall).

5. REPORTING REQUIREMENTS

5.1. General Monitoring and Reporting Requirements. The Discharger shall comply with all Standard Provisions (Attachments D and G) related to monitoring, reporting, and recordkeeping.

5.2. Self-Monitoring Reports (SMRs)

5.2.1. SMR Format. The Discharger shall electronically submit SMRs using the State Water Board's [California Integrated Water Quality System \(CIWQS\) Program website](https://waterboards.ca.gov/water_issues/programs/ciwqs/) (waterboards.ca.gov/water_issues/programs/ciwqs). The CIWQS website will provide additional information for SMR submittal in the event of a planned service interruption for electronic submittal.

5.2.2. Annual SMR. Annual SMRs shall be due June 15 each year, covering the preceding calendar year (January 1 through December 31). The annual SMR shall contain the items described in Attachment G section 5.3.1.6. See also Provisions 6.3.2 (Effluent Characterization Study and Report), 6.3.3 (Pollutant Minimization Program), 6.3.4.2 (Wet Weather Discharge Annual Technical Report), and 6.3.4.3 (Wet Weather Facilities Management Plan) of the Order, and Attachment G section 5.3.1.6 (Annual Self-Monitoring Reports).

5.2.3. Specifications for Submitting SMRs to CIWQS. The Discharger shall submit analytical results and other information using one of the following methods:

Table E-7. CIWQS Reporting

Parameter	Method of Reporting: EDF/CDF data upload	Attached File
All parameters identified in influent, effluent, and receiving water monitoring tables (except Dissolved Oxygen and Temperature)	Required for all results	-
Dissolved Oxygen, Temperature	Required for monthly maximum and minimum results only ^[1]	Discharger may use this method for all results or keep records

Parameter	Method of Reporting: EDF/CDF data upload	Attached File
Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Cyanide, Lead, Mercury, Nickel, Selenium, Silver, Thallium, Zinc, Dioxins & Furans (by U.S. EPA Method 1613), Other Pollutants (by U.S. EPA Methods 601, 602, 608, 610, 614, 624, and 625)	Required for all results ^[2]	-
Volume and Duration of Blended Discharge ^[3]	Required for all blended effluent discharges	-
Analytical Method	Not required (Discharger may select "data unavailable") ^[1]	-
Collection Time, Analysis Time	Not required	-

Footnotes:

- ^[1] The Discharger shall continue to monitor at the minimum frequency specified in this MRP, keep records of the measurements, and make the records available upon request.
- ^[2] These parameters require EDF/CDF data upload or manual entry regardless of whether monitoring is required by this MRP or other provisions of this Order (except for biosolids, sludge, or ash provisions).
- ^[3] The requirements for volume and duration of blended discharge applies only if this Order authorizes the Dischargers to discharge blended effluent.

The Discharger shall arrange all reported data in a tabular format and summarize data to clearly illustrate whether the Facility is operating in compliance with effluent limitations. The Discharger is not required to duplicate the submittal of data entered in a tabular format within CIWQS. When electronic submittal of data is required and CIWQS does not provide for entry into a tabular format, the Discharger shall electronically submit the data in a tabular format as an attachment.

5.2.4. Monitoring Periods. Monitoring periods for all required monitoring shall be as set forth below unless otherwise specified:

Table E-8. Monitoring Periods

Sampling Frequency	Monitoring Period Begins On...	Monitoring Period
Continuous/D	First moment of discharge	All times during a discharge event
Once every two hours	First moment of discharge	Once every two-hour period, beginning within the first two hours of discharge.
1/Discharge	First moment of discharge	Anytime during a discharge event from beginning to end of discharge flow
1/Year ^[1]	Closest January 1 before or after Order effective date	January 1 through December 31
Once	Order effective date	Once during the permit term within 12 months prior to applying for permit reissuance
Twice	Order effective date	Twice during the permit term within 12 months prior to applying for permit reissuance

Footnotes:

- ^[1] Monitoring performed during the previous order term may be used to satisfy monitoring required by this Order.

5.2.5. **RL and MDL Reporting.** The Discharger shall report with each sample result the Reporting Level (RL) and Method Detection Limit (MDL) as determined by the procedure in 40 C.F.R. part 136. The Discharger shall report the results of analytical determinations for the presence of chemical constituents in a sample using the following reporting protocols:

5.2.5.1. Sample results greater than or equal to the RL shall be reported as measured by the laboratory (i.e., the measured chemical concentration in the sample).

5.2.5.2. Sample results less than the RL, but greater than or equal to the laboratory's MDL, shall be reported as "Detected, but Not Quantified," or DNQ. The estimated chemical concentration of the sample shall also be reported.

For purposes of data collection, the Discharger shall require the laboratory to write the estimated chemical concentration next to DNQ. The laboratory may, if such information is available, include numerical estimates of the data quality for the reported result. Numerical estimates of data quality may be percent accuracy ($\pm$ a percentage of the reported value), numerical ranges (low to high), or any other means the laboratory considers appropriate.

5.2.5.3. Sample results less than the laboratory's MDL shall be reported as "Not Detected", or ND.

5.2.5.4. The Discharger shall instruct laboratories to establish calibration standards so that the minimum level (ML) value (or its equivalent if there is differential treatment of samples relative to calibration standards) is the lowest calibration standard. At no time is the Discharger to use analytical data derived from extrapolation beyond the lowest point of the calibration curve.

5.2.6. **Compliance Determination.** Compliance with effluent limitations shall be determined using sample reporting protocols defined above, in the Fact Sheet, and in Attachments A, D, and G. For purposes of reporting and administrative enforcement by the Regional Water Board and State Water Board, the Discharger shall be deemed out of compliance with effluent limitations if the concentration of the pollutant in the monitoring sample is greater than the effluent limitation and, if applicable, greater than or equal to the RL.

5.3. **Discharge Monitoring Reports (DMRs).** DMRs are U.S. EPA reporting requirements. The Discharger shall electronically certify and submit DMRs together with SMRs using Electronic Self-Monitoring Reports module eSMR 2.5 or the latest upgraded version. Electronic DMR submittal shall be in addition to electronic SMR submittal. Information about electronic DMR submittal is available at the [DMR website](https://waterboards.ca.gov/water_issues/programs/discharge_monitoring) (waterboards.ca.gov/water_issues/programs/discharge_monitoring).

ATTACHMENT F – FACT SHEET

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ATTACHMENT F – FACT SHEET

This Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this Order. As described in section 2.2 of the Order, the Regional Water Board incorporates this Fact Sheet as findings supporting the issuance of the Order.

1. PERMIT INFORMATION

The following table summarizes administrative information related to the facility.

Table F-1. Facility Information

WDID	2 019129001
CIWQS Place ID	236689
Discharger	Livermore-Amador Valley Water Management Agency (LAVWMA) Dublin San Ramon Services District City of Livermore City of Pleasanton
Facility Name	LAVWMA Export and Storage Facilities
Facility Address	7176 Johnson Drive Pleasanton, CA 94588 Alameda County
Facility Contact, Title, Phone, and Email	Levi Fuller, LAVWMA General Manager, (707) 373-7030, fuller@lavwma.com
Authorized Person to Sign and Submit Reports	LAVWMA General Manager or Dublin San Ramon Services District Operations Director, (925) 719-2997
Mailing Address	7051 Dublin Boulevard Dublin, CA 94568 Alameda County
Billing Address	Same as facility address
Facility Type	Publicly Owned Treatment Works (POTW)
Major or Minor Facility	Minor
Water Quality Threat	2
Complexity	B
Pretreatment Program	No
Mercury and PCBs Requirements	NPDES Permit CA0038849
Nutrients Requirements	NPDES Permit CA0038873
Discharge Exercise Permitted Flow	450,000 gallons per discharge to San Lorenzo Creek 140,000 gallons per discharge to Alamo Canal
EBDA Pipeline Contract Capacity	41.2 million gallons per day (MGD) – total capacity 19.7 MGD – firm capacity 21.5 MGD – interruptible capacity
Watersheds	San Lorenzo Creek and Alameda Creek
Receiving Water	San Lorenzo Creek and Alamo Canal
Receiving Water Type	Freshwater (during wet weather events)
Date of Last Inspection	February 23, 2026

- 1.1.** The Livermore-Amador Valley Water Management Agency (LAVWMA), Dublin San Ramon Services District, City of Livermore, and City of Pleasanton (collectively, the Discharger) own the LAVWMA Export and Storage Facilities (Facility). LAVWMA is a Joint Powers Agency comprised of the Dublin San Ramon Services District, City of Livermore, and City of Pleasanton. The Dublin San Ramon Services District operates the Facility, which receives secondary-treated wastewater from the Dublin San Ramon Services District and City of Livermore wastewater treatment plants. During wet weather, the Facility sometimes discharges treated effluent to San Lorenzo Creek and Alamo Canal, waters of the United States within the San Lorenzo Creek and Alameda Creek watersheds.

At all other times (except during limited discharge exercises), the Facility discharges wastewater through the East Bay Dischargers Authority (EBDA) pipeline and dechlorination station (near the San Leandro Marina) to a deepwater outfall into San Francisco Bay. Discharges from the deepwater outfall are regulated under National Pollutant Discharge Elimination System (NPDES) Permit CA0037869. EBDA operates under a Joint Exercise of Powers Agreement among the City of Hayward, City of San Leandro, Union Sanitary District, Oro Loma Sanitary District, and Castro Valley Sanitary District. The Discharger has a contract with EBDA that specifies the terms and conditions of its discharge through the EBDA system.

The Dublin San Ramon Services District and City of Livermore separately own and operate collection and treatment facilities for domestic, commercial, and industrial wastewater that are regulated by NPDES Permits CA0037613 and CA0038008, respectively. The Dublin San Ramon Services District treats wastewater from the City of Dublin, the City of Pleasanton, and approximately 15 percent of the City of San Ramon. The City of Pleasanton owns and operates its own collection system but does not own or operate a wastewater treatment plant. The City of Pleasanton has enrolled its collection system under the Statewide Sanitary Sewer Systems General Order (Order WQ 2022-0103-DWQ).

For the purposes of this Order, references to the “discharger” or “permittee” in applicable federal and state laws, regulations, plans, and policies are held to be equivalent to references to the Discharger herein.

- 1.2.** The Discharger is regulated pursuant to NPDES Permit CA0038679. The Discharger is authorized to discharge subject to the Waste Discharge Requirements (WDRs) in this Order at the discharge locations described in Table 1 of this Order.
- 1.3.** The Discharger was previously subject to Order R2-2021-0007 (previous order) as amended by R2-2023-0023. Order R2-2023-0023 amended the previous order to update the effluent limitation for total residual chlorine and remove the effluent limitation and monitoring requirement for oil and grease. These updated requirements have been incorporated into this Order.

- 1.4. The Discharger filed a Report of Waste Discharge and submitted an application for reissuance of its Waste Discharge Requirements (WDRs) and NPDES permit on September 30, 2025.
- 1.5. Clean Water Act section 402(b)(1)(B) limits the duration of NPDES permits to a fixed term not to exceed five years. Accordingly, this Order limits the effective period for the discharge authorization. Pursuant to California Code of Regulations, title 23, section 2235.4, the terms and conditions of an expired permit are automatically continued pending reissuance of the permit if the Discharger complies with all requirements for continuation of expired permits (40 C.F.R. § 122.6(d)).
- 1.6. When applicable, state law requires dischargers to file a petition with the State Water Resources Control Board (State Water Board), Division of Water Rights, and receive approval for any change in the point of discharge, place of use, or purpose of use of treated wastewater that decreases the flow in any portion of a watercourse. The State Water Board retains separate jurisdictional authority to enforce such requirements under Water Code section 1211. This is not an NPDES permit requirement.

2. FACILITY DESCRIPTION

2.1. Sanitary Sewer System and Treatment

- 2.1.1. **Location and Service Area.** The Facility is located at 7176 Johnson Drive in Pleasanton. It receives secondary-treated and disinfected domestic, commercial, and industrial wastewater from the cities of Dublin, Livermore, and Pleasanton. The estimated service area population is about 254,500.

Attachment B provides a map of the area around the Facility.

- 2.1.2. **Wastewater Treatment.** The Facility receives wastewater that has already been treated to secondary treatment standards through screening, primary sedimentation, activated sludge, secondary clarification, and chlorination from the Dublin San Ramon Services District and City of Livermore wastewater treatment plants. Typically, this treated wastewater is discharged through the EBDA pipeline. Prior to any discharge to San Lorenzo Creek or Alamo Canal, the wastewater is dechlorinated.

Attachment C provides a flow schematic.

- 2.1.3. **Stormwater Management.** All stormwater flows in contact with equipment or wastewater at the Facility are collected and directed to the headworks of the Dublin San Ramon Services District Wastewater Treatment Plant for treatment. Therefore, no additional stormwater requirements are necessary.

2.2. Discharge Point and Receiving Waters. This Order covers two intermittent wet weather discharge points for secondary-treated, disinfected, and dechlorinated municipal wastewater. These discharges occur in San Lorenzo Creek (Discharge Point 002) and Alamo Canal (Discharge Point 003), a constructed flood control channel.

In San Lorenzo Creek, the wet weather outfall is a shallow water outfall that does not have a diffuser. The discharge location is approximately 3,000 feet upstream of Lower San Francisco Bay. In Alamo Canal, the wet weather outfall is a shallow water outfall that also does not have a diffuser. The discharge enters a drainage channel adjacent to the Facility and then flows approximately one mile before entering Alamo Canal. The outfall to Alamo Canal is approximately 2,600 feet upstream of the confluence with the Arroyo de la Laguna stream. The discharge location into Alamo Canal is approximately 25 miles upstream of Lower San Francisco Bay. Attachment B shows the two outfalls in relation to the Facility and Lower San Francisco Bay.

The Discharger's contract with EBDA allots the Discharger 41.2 MGD of discharge capacity in the EBDA pipeline. This allotment is also the Facility's maximum hydraulic pumping capacity. Of this allotment, 19.7 MGD is a firm capacity, and 21.5 MGD is an interruptible capacity. This means that, under the most extreme wet weather conditions, the Discharger may only have a capacity of 19.7 MGD in the EBDA pipeline. The amount of interruptible capacity available depends on the capacity of the EBDA pipeline not occupied by wet weather flows from the other EBDA member agencies. Therefore, the Discharger's capacity in the EBDA pipeline ranges between 19.7 MGD and 41.2 MGD during wet weather.

During peak wet weather events, the Discharger can maintain its maximum export capacity of 41.2 MGD by discharging up to 21.5 MGD through the San Lorenzo Creek wet weather outfall, while continuing to route at least 19.7 MGD to the EBDA pipeline. The Discharger stops discharging to San Lorenzo Creek when the EBDA pipeline's available capacity equals or exceeds the Discharger's effluent flow. The average discharge rate to the EBDA pipeline over the previous order term was 11.1 MGD.

If the influent flow to the Facility exceeds the Facility's 41.2 MGD-maximum export capacity to the EBDA pipeline (or to the EBDA pipeline and the San Lorenzo Creek outfall), the Discharger must discharge to the Alamo Canal wet weather outfall to avoid flooding and damaging the Facility. The Discharger stops discharging to Alamo Canal when influent flow to the Facility is less than or equal to 41.2 MGD. Discharges to Alamo Canal are not expected to exceed 55 MGD.

The Discharger also discharges briefly to San Lorenzo Creek up to twice per year. The purpose of these discharges is to test the discharge flap gate located in the San Lorenzo Creek outfall. These discharge exercises ensure that the discharge line is flushed and the discharge gate and dechlorination equipment are

operational when it is necessary to use the outfall during peak wet weather. This Order allows the Discharger to continue annual discharge exercises at the Alamo Canal outfall during the wet season when there is a significant flow increase in Alamo Canal. Since the last discharge to Alamo Canal occurred over two decades ago, the purpose of these discharges is to evaluate the hydraulics in the drainage channel (the initial discharge point) that leads to Alamo Canal and determine necessary maintenance to the drainage channel and related infrastructure.

Wet weather discharges are expected to be relatively short, small, and infrequent, and are only expected during peak wet weather when natural flows in San Lorenzo Creek and Alamo Canal are high. The Discharger minimizes discharges to Alamo Canal by using three flow equalization basins that together provide 18 million gallons (MG) of storage. The Dublin San Ramon Services District and City of Livermore also use two storage ponds (21 MG and 16 MG) to minimize flows to the Facility.

Although the Discharger's December 2010 *Mixing Zone Analysis for Wet Weather Discharges* projected wet weather discharges once every 1.5 years to San Lorenzo Creek and once every 10 years to Alamo Canal, discharges may occur less frequently during this Order term due to new contract agreements with EBDA member agencies that have reduced their allotted discharge capacities to the EBDA pipeline. This may allow the Discharger to more frequently discharge up to its full 41.2 MGD export capacity to the EBDA pipeline, thereby reducing the need to discharge into San Lorenzo Creek.

The last wet weather discharge occurred on February 20, 2017, when approximately 2.8 MG was discharged to San Lorenzo Creek over three hours. Prior to that discharge, the last wet weather discharge occurred in January 2010. No discharges to Alamo Canal have occurred during the past 26 years.

- 2.3. Previous Requirements and Monitoring Data.** The table below presents the previous order's effluent limitations and representative monitoring data from the previous order term. Previous order discharge data were collected between November 2021 and November 2024 during intermittent and infrequent discharge events.

Table F-2. Previous Effluent Limitations and Monitoring Data

Based on monitoring data collected between November 2021 and November 2024.

Parameter	Unit	Average Monthly Limitation	Average Weekly Limitation	Maximum Daily Limitation	Other Limitation	Long-Term Average During Wet Season	Highest Daily Value
Carbonaceous Biochemical Oxygen Demand (5 day @ 20°C) (CBOD ₅)	mg/L	-	40	-	-	[1]	[1]

Parameter	Unit	Average Monthly Limitation	Average Weekly Limitation	Maximum Daily Limitation	Other Limitation	Long-Term Average During Wet Season	Highest Daily Value
Total Suspended Solids (TSS)	mg/L	-	45	-	-	[1]	[1]
Oil and Grease	mg/L	-	-	20	-	[1]	[1]
pH	s.u.	-	-	-	6.5 – 8.5 [2]	7.1	6.6 – 7.3 [3]
<i>Escherichia</i> Coliform (<i>E.coli</i>) Bacteria	MPN/100 mL	-	-	320 [4]	-	<14.6 [5]	14.6
Chlorine, Total Residual	mg/L	-	-	-	0.019 [6]	<0.7 [7],[8]	0.7 [8]
Discharge Exercise Volume	gallons	-	-	-	140,000 [9]	56,000	75,000

Footnotes:

- [1] The Discharger did not have any wet weather discharges during the previous order term and therefore did not monitor for CBOD₅, TSS, or oil and grease.
- [2] The limitation was expressed as an instantaneous minimum and instantaneous maximum.
- [3] The range is the lowest and highest pH values.
- [4] This limitation was expressed as the geometric mean in a calendar month.
- [5] This result represents the average of *Escherichia* coliform sample results collected during discharge exercises to San Lorenzo Creek and Alamo Canal. All but one sample were non-detect.
- [6] This limitation was expressed as a one-hour average and became effective on January 1, 2024, through the adoption of Order R2-2023-0023. Prior to the adoption of this order, the limitation was 0.0 mg/L and was expressed as an instantaneous maximum.
- [7] This result represents the average of chlorine sample results collected during discharge exercises to San Lorenzo Creek and Alamo Canal. All but one sample were non-detect.
- [8] The Discharger violated the previous order's total residual chlorine effluent limitations once during a discharge exercise on March 9, 2023. See Fact Sheet section 2.4. All other chlorine results were below sample method detection limits.
- [9] The previous order prohibited discharge exercise volumes greater than 140,000 gallons per discharge event.

2.4. Compliance Summary

2.4.1. **Effluent Limitation Violations.** The Discharger violated its effluent limitations once during the previous order term.

Table F-3. Effluent Limitation Violation

Date of Violation	Violation	Units	Effluent Limitation	Reported Value
03/09/2023	Total Residual Chlorine, Instantaneous Maximum	mg/L	0.0	0.7

On March 9, 2023, the Discharger exceeded the instantaneous maximum limitation for total residual chlorine while discharging to San Lorenzo Creek during a flap gate exercise. This occurred due to an operational issue with the onsite dechlorination system, in which the calcium thiosulfate pumps did not deliver adequate product for disinfection. In response, the Discharger created a

standard process to perform weekly testing on its calcium thiosulfate delivery system and updated its flow totalizers to provide real-time data. The Regional Water Board settled this violation with the Discharger through a mandatory minimum penalty of \$3,000 issued through Order R2-2024-1016.

2.5. Planned Changes. During the previous permit term, the Discharger completed upgrades to the San Leandro Sample Station (Monitoring Location EFF-001) to allow for improved and remote control of the operations of the facility. This includes the installation of a new motor-operated valve at the San Lorenzo Creek outfall, which will improve discharge control and will remove the need to send personnel to the sample station to manually operate the valve during extreme wet weather. The new motor-operated valve requires additional programming and testing to be completed during the current permit term to ensure full operability for wet weather discharges

2.6. Sea Level Rise. Sea level rise does not threaten most of the Facility's infrastructure (e.g., flow equalization basins, pump stations, and pipelines), which is located in Pleasanton, and is over 12 miles inland from Lower San Francisco Bay. This includes the Alamo Canal outfall, where discharges must travel 25 miles downstream to Lower San Francisco Bay. The San Lorenzo Creek outfall is located approximately 3,000 feet upstream of Lower San Francisco Bay. During the previous permit term, the Discharger completed upgrades to the San Leandro Sample Station (Monitoring Location EFF-001), which include elevating the discharge point from a flapper gate located on the bank of San Lorenzo Creek to a duck bill discharge valve a few feet above the creek bank.

3. APPLICABLE PLANS, POLICIES, AND REGULATIONS

The requirements contained in this Order are based on the requirements and authorities described in this section.

3.1. Legal Authorities. This Order serves as WDRs pursuant to California Water Code article 4, chapter 4, division 7 (commencing with § 13260). This Order is also issued pursuant to federal Clean Water Act (CWA) section 402 and implementing regulations adopted by the U.S. EPA, and Water Code chapter 5.5, division 7 (commencing with § 13370). It serves as an NPDES permit authorizing the Discharger to discharge into waters of the United States at the discharge locations described in Table 1 subject to the WDRs in this Order.

3.2. California Environmental Quality Act (CEQA). Under Water Code section 13389, this action to adopt an NPDES permit is exempt from the provisions of the California Environmental Quality Act (CEQA), Public Resources Code division 13, chapter 3 (commencing with § 21100). This Order includes the receiving water limitations in section 5 of the Order and Attachment G Provision 1.9.1 under State law only. These State law requirements are not subject to the exemption under Water Code section 13389. However, the previous order imposed the same or similar requirements to address nuisance and toxicity

such that the methods of compliance will not change. As such, including these requirements is not a project subject to CEQA because doing so will not cause a direct or indirect physical change in the environment (Public Resources Code §§ 21065, 21080).

3.3. State and Federal Laws, Regulations, Policies, and Plans

3.3.1. **Water Quality Control Plan.** The Regional Water Board adopted the *Water Quality Control Plan for the San Francisco Bay Basin* (Basin Plan), which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. Requirements in this Order implement the Basin Plan. In addition, this Order implements State Water Board Resolution 88-63, which established State policy that all waters, with certain exceptions, should be considered suitable or potentially suitable for municipal or domestic supply. The Basin Plan designates the municipal and domestic supply (MUN) beneficial use to San Lorenzo Creek but not to Alamo Canal. Consistent with State water Board Resolution 88-63, the municipal and domestic supply beneficial use does not apply to Alamo Canal because total dissolved solids there exceed 3,000 mg/L (see Fact Sheet section 4.3.3.9). Alamo Canal may exhibit freshwater conditions during peak wet weather when discharges are necessary, but these short-term circumstances are too short-lived to provide a good source of drinking water and support the municipal and domestic supply beneficial use. Therefore, the beneficial uses applicable to San Lorenzo Creek and Alamo Canal are as follows:

Table F-4. Beneficial Uses

Discharge Points	Receiving Water	Beneficial Uses
002	San Lorenzo Creek	Municipal and Domestic Supply (MUN) Freshwater Replenishment (FRSH) Cold Freshwater Habitat (COLD) Fish Migration (MIGR) Fish Spawning (SPWN) Warm Freshwater Habitat (WARM) Wildlife Habitat (WILD) Water Contact Recreation (REC1) Non-Contact Water Recreation (REC2)
003	Alamo Canal	Groundwater Recharge (GWR) Cold Freshwater Habitat (COLD) Preservation of Rare and Endangered Species (RARE) Warm Freshwater Habitat (WARM) Wildlife Habitat (WILD) Water Contact Recreation (REC1) Non-Contact Water Recreation (REC2)

- 3.3.2. **National Toxics Rule (NTR) and California Toxics Rule (CTR).** The NTR and CTR contain federal water quality criteria for priority pollutants. U.S. EPA adopted the NTR on December 22, 1992, and amended it on May 4, 1995, and November 9, 1999. About 40 NTR criteria apply in California. U.S. EPA adopted the CTR on May 18, 2000. The CTR promulgated new toxics criteria for California and incorporated the NTR criteria that applied in the State. U.S. EPA amended the CTR on February 13, 2001, and again on January 16, 2025.
- 3.3.3. **State Implementation Policy.** The State Water Board adopted the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP) on March 2, 2000. The SIP establishes implementation provisions for priority pollutant criteria and objectives, and provisions for chronic toxicity control. The SIP became effective on April 28, 2000, with respect to the priority pollutant criteria U.S. EPA promulgated for California through the NTR and the priority pollutant objectives the Regional Water Board established through the Basin Plan. The SIP became effective on May 18, 2000, with respect to the priority pollutant criteria U.S. EPA promulgated through the CTR. The State Water Board adopted amendments to the SIP on February 24, 2005, that became effective on July 13, 2005. Requirements of this Order implement the SIP.
- 3.3.4. **Bacteria Objectives.** The State Water Board adopted the *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Part 3, Bacteria Provisions and a Water Quality Standards Variance Policy* on August 7, 2018, and it became effective on March 22, 2019. This plan establishes *Escherichia* coliform bacteria water quality objectives and related implementation provisions for discharges to freshwater receiving waters that support the water contact recreation beneficial use.
- 3.3.5. **Toxicity Provisions.** On December 1, 2020, the State Water Board adopted *State Policy for Water Quality Control: Toxicity Provisions* (Toxicity Provisions), which established statewide numeric water quality objectives for both acute and chronic toxicity using the Test of Significant Toxicity (TST) and a program of implementation to control toxicity. On October 5, 2021, the State Water Board adopted a resolution confirming that the Toxicity Provisions were adopted as a state policy for water quality control for all inland surface waters, enclosed bays, estuaries, and coastal lagoons of the state, regardless of their status as waters of the United States. The Toxicity Provisions establish a uniform regulatory approach to provide consistent protection of aquatic life beneficial uses and protect aquatic habitats and life from the effects of known and unknown toxicants. The Toxicity Provisions were approved by the Office of Administrative Law on April 25, 2022, and by U.S.EPA on May 1, 2023.

On December 14, 2023, the State Water Board applied for U.S. EPA Region IX review and approval of a limited-use alternative test procedure (ATP) for the use of one effluent concentration when conducting whole effluent toxicity (WET)

tests, pursuant to 40 C.F.R. section 136.5 (Aug. 28, 2017). The application is specific to acute or chronic WET tests in Table 1 of the application when using the TST statistical approach (U.S. EPA, 2010) for analyzing the data. The application is being sought for all dischargers or facilities in the State of California and their associated laboratories. The ATP application is still pending with U.S. EPA.

The use of the TST has been the subject of litigation. In December 2024, the Second District Court of Appeal upheld the use of the TST in an NPDES permit in the case *Camarillo Sanitary District v. California Regional Water Quality Control Board - Los Angeles Region*.

A separate legal challenge to the State Water Board's adoption of the Toxicity Provisions originated in Fresno County Superior Court on July 18, 2022, through a petition for writ of mandate filed by Camarillo Sanitary District, City of Simi Valley, City of Thousand Oaks, Central Valley Clean Water Association, and Clean Water SoCal (formerly known as Southern California Alliance of Publicly Owned Treatment Works) (Petitioners). One of the claims was that the Toxicity Provisions were inconsistent with the Clean Water Act. On October 9, 2023, the superior court denied the petition in its entirety.

On December 19, 2023, three of the Petitioners filed a notice of appeal of the Fresno Superior Court's decision upholding the Toxicity Provisions. On August 5, 2025, the Fifth District Court of Appeal issued a published opinion holding that the TST statistical approach, which is an integral component of the Toxicity Provisions, cannot be utilized in NPDES permitting to evaluate WET data because the TST is not an approved method under 40 C.F.R. part 136. The Court of Appeal did not, however, disturb the Toxicity Provisions' use of the TST as a part of its water quality objectives. The State Water Board prevailed on all other claims in the litigation. The Court of Appeal's decision became final on September 4, 2025.

On September 15, 2025, the State Water Board filed a petition for review of the Fifth Circuit Court of Appeal's decision with the California Supreme Court. On November 12, 2025, the California Supreme Court granted review. The issues to be briefed and argued are limited to the issues raised in the State Water Board's petition for review.

Pending the California Supreme Court's review, the opinion of the Fifth Circuit Court of Appeal is not binding on the Water Boards. However, the opinion may be cited, not only for its persuasive value, but also for the limited purpose of establishing the existence of a conflict in authority.

In accordance with Water Code sections 13146 and 13247, the Regional Water Board must fully implement the water quality objectives and their implementation procedures in the Toxicity Provisions. The numeric water quality objectives for chronic and acute toxicity established by the Toxicity

Provisions, which are based on the TST, were approved by U.S. EPA and remain in effect. As such, the numeric water quality objectives continue to serve as the applicable federal water quality standards in California.

The Regional Water Board must also continue to comply with federal Clean Water Act NPDES regulations for determining reasonable potential and establishing applicable water quality-based effluent limitations (WQBELs). NPDES regulations (40 C.F.R. section 122.44(d)(1)(vii)(A)) require that all WQBELs be derived from and comply with all applicable water quality standards. Moreover, although the Toxicity Provisions left in place narrative water quality objectives for aquatic toxicity in the Basin Plan, the Toxicity Provisions did supersede Basin Plan provisions and portions of the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (SIP) for implementing narrative water quality objectives. As such, there are currently no Basin Plan or SIP procedures in effect for implementing narrative water quality objectives to determine reasonable potential as required by 40 C.F.R. section 122.44(d)(1)(ii). As a result, the Regional Water Board must fully implement all of the Toxicity Provisions.

- 3.3.6. **Sediment Quality.** The State Water Board adopted the *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1, Sediment Quality* on September 16, 2008, and it became effective on August 25, 2009. The State Water Board adopted amendments to the plan on June 5, 2018, that became effective on March 11, 2019. This plan supersedes other narrative sediment quality objectives and establishes new sediment quality objectives and related implementation provisions for specifically defined sediments in most bays and estuaries.
- 3.3.7. **Mercury Provisions.** The State Water Board adopted Resolution 2017-0027, which approved *Final Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions* (Mercury Provisions) on May 2, 2017, thereby establishing water quality objectives for mercury in most state waters. The Mercury Provisions establish mercury fish tissue water quality objectives based on beneficial uses and translate those objectives into mercury water column criteria. Requirements of this Order implement the Mercury Provisions.
- 3.3.8. **Antidegradation Policy.** Federal regulations at 40 C.F.R. section 131.12 require that state water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy through State Water Board Resolution 68-16, *Statement of Policy with Respect to Maintaining High Quality of Waters in California*, which incorporates the federal antidegradation policy where the federal policy applies under federal law. Resolution 68-16 requires that existing

water quality be maintained unless degradation is justified based on specific findings. The Basin Plan implements, and incorporates by reference, both the state and federal antidegradation policies. Permitted discharges must be consistent with the antidegradation provisions of 40 C.F.R. section 131.12 and State Water Board Resolution 68-16.

3.3.9. **Anti-Backsliding Requirements.** CWA sections 402(o) and 40 C.F.R. section 122.44(l) restrict backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit be at least as stringent as those in the previous permit, with some exceptions in which limitations may be relaxed.

3.3.10. **Endangered Species Act Requirements.** This Order does not authorize any act that results in the taking of a threatened or endangered species or any act that is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish and Game Code §§ 2050 to 2097) or Federal Endangered Species Act (16 U.S.C. §§ 1531 to 1544). This Order requires compliance with effluent limitations, a receiving water limitation, and other requirements to protect the beneficial uses of waters of the State, including protecting rare, threatened, or endangered species. The Discharger is responsible for meeting all applicable Endangered Species Act requirements.

3.4. Impaired Water Bodies on CWA section 303(d) List.

On December 13, 2024, U.S. EPA approved a revised list of impaired waters pursuant to CWA section 303(d), which requires identification of specific water bodies where it is expected that water quality standards will not be met after implementation of technology-based effluent limitations on point sources. Where it has not done so already, the Regional Water Board plans to adopt Total Maximum Daily Loads (TMDLs) for pollutants on the 303(d) list. TMDLs establish wasteload allocations for point sources and load allocations for nonpoint sources and are established to achieve water quality standards.

San Lorenzo Creek is listed as impaired by diazinon, a pesticide. On May 16, 2007, U.S. EPA approved the diazinon and pesticide-related toxicity TMDL for San Lorenzo Creek in Basin Plan section 7.1.1. According to the TMDL, the Discharger is not a source of diazinon or pesticide-related toxicity; therefore, the TMDL does not contain a specific wasteload allocation or other implementation requirements for the Discharger.

Alamo Canal is not listed as impaired by any pollutant.

4. RATIONALE FOR EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

The CWA requires point source dischargers to control the amount of conventional, non-conventional, and toxic pollutants discharged into waters of the United States. The control of pollutants discharged is established through effluent limitations and

other requirements in NPDES permits. There are two principal bases for effluent limitations: 40 C.F.R. section 122.44(a) requires that permits include applicable technology-based limitations and standards, and 40 C.F.R. section 122.44(d) requires that permits include water quality-based effluent limitations to attain and maintain applicable numeric and narrative water quality criteria to protect the beneficial uses of receiving waters.

4.1. Discharge Prohibitions

4.1.1. Prohibitions in this Order

- 4.1.1.1. **Discharge Prohibition 3.1 (No discharge other than as described):** This prohibition is based on 40 C.F.R. section 122.21(a) and Water Code section 13260, which require filing an application and Report of Waste Discharge before a discharge can occur. Discharges not described in the application and Report of Waste Discharge, and subsequently in this Order, are prohibited.
- 4.1.1.2. **Discharge Prohibition 3.2 (No discharge to San Lorenzo Creek, except during wet weather or during discharge exercises):** This prohibition ensures that discharges to San Lorenzo Creek occur only during peak wet weather when the maximum export capacity available in the EBDA pipeline is less than 41.2 MGD and the Discharger's effluent flow exceeds the available export capacity, or when conducting discharge exercises. For discharge exercises, discharges above 450,000 gallons are prohibited so such discharges only occur to the extent necessary to complete the maintenance tests. Prohibiting discharges except under these conditions and the conditions under Discharge Prohibition 3.5 are consistent with Basin Plan Discharge Prohibition 1 (Basin Plan Table 4-1).
- 4.1.1.3. **Discharge Prohibition 3.3 (No discharge to Alamo Canal, except during wet weather):** This prohibition ensures that discharges to Alamo Canal occur only during peak wet weather when the Discharger's effluent flow exceeds the maximum export capacity of 41.2 MGD to the EBDA pipeline (or the EBDA pipeline and San Lorenzo Creek outfall), or when performing a discharge exercise. Discharges above 140,000 gallons are prohibited during discharge exercises so such discharges only occur to the extent necessary to complete the maintenance tests. Prohibiting discharges except under these conditions and the conditions under Discharge Prohibition 3.5 are consistent with Basin Plan Discharge Prohibition 1 (Basin Plan Table 4-1).
- 4.1.1.4. **Discharge Prohibition 3.4 (No bypass):** This prohibition is based on 40 C.F.R. section 122.41(m) (see Attachment D, section 1.7).
- 4.1.1.5. **Discharge Prohibition 3.5 (No discharge exercise more than twice per year in San Lorenzo Creek and once per year in Alamo Canal):** This prohibition restricts potential water quality impacts to San Lorenzo Creek and

Alamo Canal resulting from discharge exercises by limiting the number of such discharges. Discharges to San Lorenzo Creek may occur during the dry or wet season to ensure full operability of the wet weather outfall system before necessary discharges during significant wet weather events become necessary. San Lorenzo Creek has year-round flow and Discharge Point 002 is located a short distance (approximately 3,000 feet upstream) from Lower San Francisco Bay, which will provide adequate mixing and dilution to discharges year-round. Discharges to Alamo Canal may only occur in the wet season (November 1 through April 30), when flows in Alamo Canal increase. This prohibition ensures that discharges from discharge exercises will minimize impacts to San Lorenzo Creek and Alamo Canal by limiting the number of discharges that occur each year and that discharges to Alamo Canal are significantly mixed and diluted and occur during conditions that reflect the assumptions underlying the reasonable potential analysis, effluent limitations, and other requirements of this Order. Prohibiting discharges except under these conditions and the conditions under Discharge Prohibitions 3.2 and 3.3 are consistent with Basin Plan Discharge Prohibition 1 (Basin Plan Table 4-1).

4.1.2. **Exceptions to Basin Plan Discharge Prohibitions.** Basin Plan Table 4-1, Discharge Prohibition 1, prohibits discharges of wastewater that has particular characteristics of concern to beneficial uses at any point at which the wastewater does not receive a minimum of 10:1 initial dilution or discharges into any nontidal water, dead-end slough, or similar confined waters and their tributaries. Discharges from Discharge Points 002 and 003 will not receive an initial dilution of at least 10:1 as they enter the shallow waters of San Lorenzo Creek or Alamo Canal. The purpose of Discharge Prohibition 1 is to protect against the following:

- continuous effects of waste discharge;
- effects of abnormal discharges caused by temporary plant upsets or malfunctions;
- public contact with undiluted waste; and
- visual impacts.

4.1.2.1. Discharge Prohibition 1 does not apply to discharges covered under this Order for the following reasons:

4.1.2.1.1. Discharges are short, infrequent, and not continuous. Wet weather discharges are expected to occur at most approximately once every 1.5 years in San Lorenzo Creek and once every 10 years in Alamo Canal. The last wet weather discharge that occurred was in San Lorenzo Creek on February 20, 2017. That discharge took place over the course of three

hours. Prior to that discharge, the last wet weather discharge occurred in January 2010. No discharge to Alamo Canal has occurred in the past 26 years. Discharge exercises will occur no more than twice per year in San Lorenzo Creek and no more than once per year in Alamo Canal. Additionally, discharges will occur only during wet weather, when discharges are flushed and diluted by increased creek flows and stormwater outfalls located downstream of Discharge Points 002 and 003. For these reasons, the discharges will not have continuous effects on San Lorenzo Creek or Alamo Canal beneficial uses.

- 4.1.2.1.2. The discharge of inadequately treated waste is reliably prevented because both the Dublin San Ramon Services District and City of Livermore treatment plants, which export treated wastewater to the Facility, have good compliance records. They have not violated any effluent limitations in their NPDES permits throughout the last three order terms. Moreover, if an upset were to occur at one of the treatment plants, effluent would likely flow to the EBDA common outfall. Discharge to the wet weather outfalls would require an intentional flow diversion, and it is highly unlikely that an upset would occur simultaneously with a rare wet weather discharge. Wet weather discharges receive reliable treatment because, at the San Lorenzo Creek outfall (Discharge Point 002), the discharge exercises ensure that the equipment necessary for discharge (e.g., dechlorination equipment at San Lorenzo Creek) remains in good working order. At the Alamo Canal outfall (Discharge Point 003), which is located near the Dublin San Ramon Services District plant, plant operators are available to ensure full dechlorination and are notified of potential discharges hours before they occur because Alamo Creek discharges only occur after San Lorenzo Creek discharges commence.
- 4.1.2.1.3. There is little potential for public contact with undiluted waste. Discharges occur only during wet weather, when they are flushed and diluted by increased creek flows and downstream stormwater outfalls.
- 4.1.2.1.4. The discharge will not cause visual impacts. Discharge is treated to Secondary Treatment Standards, which address potentially objectionable color and turbidity.
- 4.1.2.2. Basin Plan section 4.2 also provides for exceptions to Discharge Prohibition 1 under certain circumstances:
- An inordinate burden would be placed on the Discharger relative to the beneficial uses protected, and an equivalent level of environmental protection can be achieved by alternate means;
 - A discharge is approved as part of a reclamation project;

- Net environmental benefits will be derived as a result of the discharge; or
- A discharge is approved as part of a groundwater cleanup project.

The Basin Plan further states:

Significant factors to be considered by the Regional Water Board in reviewing requests for exceptions will be the reliability of the discharger's system in preventing inadequately treated wastewater from being discharged to the receiving water and the environmental consequence of such discharges.

- 4.1.2.3. These discharges would qualify for an exception to Discharge Prohibition 1 for the following reasons:
- 4.1.2.3.1. An inordinate burden would be placed on the Discharger relative to the beneficial uses protected to require the discharge to achieve 10:1 dilution. Achieving 10:1 dilution would require the Discharger to construct a deepwater outfall or upgrade the Facility to expand its hydraulic export capacity to the EBDA pipeline while ensuring EBDA member agencies maintain their current contract capacities. Doing either of these tasks would be unreasonably costly and infeasible for short and intermittent discharges that are unlikely to occur more than once every 1.5 years.
- 4.1.2.3.2. The Discharger achieves a level of environmental protection equivalent to adherence to the discharge prohibition by preventing discharges more frequently than once every 1.5 years in San Lorenzo Creek and once every 10 years in Alamo Canal. Moreover, the Discharger reliably prevents inadequately-treated wastewater from being discharged because, under most possible upset conditions, effluent would flow to the EBDA common outfall, not San Lorenzo Creek or Alamo Canal.

4.2. Technology-Based Effluent Limitations

4.2.1. Scope and Authority

CWA section 301(b) and 40 C.F.R. section 122.44 require that permits include conditions meeting technology-based requirements, at a minimum, and any more stringent effluent limitations necessary to meet water quality standards. The discharges authorized by this Order must meet minimum federal technology-based requirements based on the secondary treatment standards at 40 C.F.R. section 133 as summarized below. Basin Plan Table 4-2 contains additional requirements for certain pollutants.

Table F-5. Secondary Treatment Standards

Parameter	Monthly Average	Weekly Average
Biochemical Oxygen Demand (BOD ₅) ^[1,2]	30 mg/L	45 mg/L
Carbonaceous Biochemical Oxygen Demand (CBOD ₅) ^[1,2]	25 mg/L	40 mg/L
Total Suspended Solids (TSS) ^[2]	30 mg/L	45 mg/L
pH	6.5 – 8.5 standard units	

Footnotes:

^[1] BOD₅ effluent limitations may be substituted for CBOD₅ limitations.

^[2] The monthly average percent removal, by concentration, is also not to be less than 85 percent.

4.2.2. Technology-Based Effluent Limitations

4.2.2.1. **CBOD₅ and TSS.** The CBOD₅ and TSS effluent limitations of 40 mg/L and 45 mg/L are based on the Secondary Treatment Standards and Basin Plan Table 4-2. Due to the infrequent nature of the discharge, this Order contains only the weekly average limitations, not the monthly average limitations. NPDES Permits CA0037613 (for the Dublin San Ramon Services District Wastewater Treatment Plant) and CA0038008 (for the City of Livermore Water Reclamation Plant) ensure that the Facility's effluent satisfies the monthly average effluent limitations in accordance with the Secondary Treatment Standards. The data summary in Table F-2 shows that these two treatment facilities fully comply with the monthly limitations.

4.2.2.2. **pH.** The pH effluent limitations are based on the secondary treatment standards and Basin Plan Table 4-2.

4.2.2.3. **Total Residual Chlorine.** Basin Plan Table 4-2 contains an instantaneous limitation for total residual chlorine of 0.0 mg/L. This Order continues to replace the instantaneous limitation in the Basin Plan with a higher water quality-based effluent limitation (see Fact Sheet section 4.3.4.5) imposed in the previous order, as amended by Order R2-2023-0023, because Basin Plan section 4.5.3 allows less stringent effluent limitations when certain conditions are met. It states, "The Water Board will consider establishing less stringent limitations, consistent with state and federal laws, for any discharge where it can be conclusively demonstrated through a comprehensive program approved by the Water Board that such limitations will not result in unacceptable adverse impacts on the beneficial uses of the receiving water." These conditions are met. The requirements of this Order (specifically Provision 6.3.4.4 and footnote 4 to Table E-2) include a comprehensive program that will ensure that these limitations will not result in unacceptable adverse impacts on the beneficial uses of receiving waters. Chlorine is a non-persistent pollutant that quickly degrades to a non-toxic state. This Order requires the Discharger to continue to implement a Chlorine Process Control Plan to target a chlorine residual of 0.0 mg/L at Discharge Points 002 and 003. This will ensure that chlorine will typically not be present in

discharge and, if chlorine is detected, the duration of such discharges will be relatively short.

The water quality-based effluent limitation is consistent with state and federal anti-backsliding (CWA sections 402(o), 303(d)(4), and 40 C.F.R. section 122.44(l)) and antidegradation (Resolution 68-16 and 40 C.F.R. section 131.12) laws. In terms of anti-backsliding, the water quality-based effluent limitation is not less stringent than the limitation imposed in Order R2-2023-0023. In terms of antidegradation, this Order does not authorize lowering water quality as compared to the level of discharge authorized in the previous order (as amended by Order R2-2023-0023), which is the baseline by which to measure whether degradation will occur.

4.3. Water Quality-Based Effluent Limitations

4.3.1. Scope and Authority

CWA section 301(b) and 40 C.F.R. section 122.44(d) require permits to include limitations more stringent than federal technology-based requirements where necessary to achieve water quality standards. According to 40 C.F.R. section 122.44(d)(1)(i), permits must include effluent limitations for all pollutants that are or may be discharged at levels that have a reasonable potential to cause or contribute to an exceedance of a water quality standard, including numeric and narrative objectives within a standard. Where reasonable potential has been established for a pollutant, but there is no numeric criterion or objective, water quality-based effluent limitations (WQBELs) must be established using (1) U.S. EPA criteria guidance under CWA section 304(a), supplemented where necessary by other relevant information; (2) an indicator parameter for the pollutant of concern; or (3) a calculated numeric water quality criterion, such as a proposed state criterion or policy interpreting a narrative criterion, supplemented with relevant information. The process for determining reasonable potential and calculating WQBELs when necessary is intended to achieve applicable water quality objectives and criteria and thereby protect designated beneficial uses of receiving waters.

4.3.2. Beneficial Uses and Water Quality Criteria and Objectives.

Fact Sheet section 3.3.1 identifies the beneficial uses of each of the receiving waters. Water quality criteria and objectives to protect these beneficial uses are described below.

- 4.3.2.1. Basin Plan Objectives.** The Basin Plan specifies numerous water quality objectives, including numeric objectives for 10 priority pollutants, un-ionized ammonia, and, for the Alameda Creek watershed above the Niles, total dissolved solids and chlorides. The Basin Plan also specifies narrative objectives.

- 4.3.2.1.1. **Un-ionized Ammonia.** Basin Plan section 3.3.20 contains a water quality objective for un-ionized ammonia of 0.025 mg/L (as nitrogen) as an annual median and 0.4 mg/L (as nitrogen) as a maximum for Lower San Francisco Bay, the water body to which San Lorenzo Creek and Alamo Canal flow. The annual median objective is not applicable to this Order because the discharges are so infrequent that they cannot affect the annual median concentration in San Lorenzo Creek and Alamo Canal.

Effluent and receiving water data are available for total ammonia, but not un-ionized ammonia, because (1) sampling and laboratory methods are unavailable to analyze for un-ionized ammonia, and (2) the fraction of total ammonia that exists in the toxic un-ionized form depends on pH, salinity, and temperature of the receiving water.

The un-ionized fraction of the total ammonia was calculated using the following equations (*Ambient Water Quality Criteria for Ammonia (Saltwater)*—1989, EPA Publication 440/5-88-004, 1989):

$$\text{Fraction of un-ionized ammonia} = (1 + 10^{[pK - pH]})^{-1}$$

Where, for salinity less than 1 part per thousand (ppt):

$$\begin{aligned} pK &= 0.09018 + 2729.92/T \\ T &= \text{temperature in Kelvin} \end{aligned}$$

Where, for salinity greater than 10 ppt:

$$\begin{aligned} pK &= 9.245 + 0.116*(I) + 0.0324*(298-T) + 0.0415*(P)/T \\ I &= \text{molal ionic strength of saltwater} = 19.9273*(S)/(1000-1.005109*S) \\ S &= \text{salinity (parts per thousand)} \\ T &= \text{temperature in Kelvin} \\ P &= \text{pressure (one atmosphere)} \end{aligned}$$

Paired salinity and ammonia data are unavailable, but the effluent was assumed to be freshwater and the equation for waters of salinity < 1 ppt was used.

- 4.3.2.1.2. **Toxicity and Total Residual Chlorine.** The narrative toxicity objective in Basin Plan section 3.3.18 states, “All waters shall be maintained free of toxic substances in concentrations that are lethal to or that produce other detrimental responses in aquatic organisms. ... There shall be no acute toxicity in ambient waters.”

For this Order, U.S. EPA criteria guidance under CWA section 304(a), specifically U.S. EPA’s *Ambient Water Quality Criteria for Chlorine – 1984* (EPA 440/5-84-030), is used to translate this narrative objective. These criteria are shown below:

Table F-6. Ambient Water Quality Criteria for Chlorine

Receiving Water Type	4-Day Average (mg/L)	1-Hour Average (mg/L)
Marine or Estuarine	0.0075	0.013
Freshwater	0.011	0.019

- 4.3.2.2. **CTR Criteria.** The CTR specifies numeric aquatic life and human health criteria for numerous priority pollutants. These criteria apply to inland surface waters and enclosed bays and estuaries. Some human health criteria are for consumption of “water and organisms” and others are for consumption of “organisms only.” The criteria applicable to “water and organisms” apply to San Lorenzo Creek because it is a potential source of drinking water.

In December 2024, U.S. EPA promulgated a revised CTR selenium criterion for California freshwater receiving waters in *Final Aquatic Life and Aquatic-Dependent Wildlife Selenium Water Quality Criterion for Freshwaters of California*, EPA-822-R-24-014 (Final Freshwater Selenium WQC). The revised criteria took effect on January 16, 2025, after publication in the Federal Register (U.S. EPA, 2024, Environmental Protection Agency, Fed. Reg. Vol. 89, No. 242, pages 101914 – 101938, December 17, 2024, codified at 40 C.F.R. part 131). The criterion applicable to lotic (i.e., flowing) freshwaters, 3.1 µg/L, applies to San Lorenzo Creek and Alamo Canal.

- 4.3.2.3. **NTR Criteria.** The NTR establishes numeric aquatic life and human health criteria for a number of toxic pollutants for San Francisco Bay waters upstream to and including Suisun Bay and the Sacramento-San Joaquin Delta. The NTR criteria apply to San Lorenzo Creek and Alamo Canal.
- 4.3.2.4. **Bacteria Objectives.** The *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Part 3, Bacteria Provisions and a Water Quality Standards Variance Policy* establishes *Escherichia* coliform water quality objectives to limit cases of gastrointestinal illness from water contact recreation. The *Escherichia* coliform objectives apply to freshwaters.
- 4.3.2.5. **Toxicity Provisions.** The Toxicity Provisions establish numeric chronic and acute toxicity objectives that apply to all inland surface waters, enclosed bays, and estuaries in the State with aquatic life beneficial uses. The chronic toxicity water quality objective is as follows:

H₀:
mean response (ambient water) ≤ 0.75 x mean response (control water)

H_a:
mean response (ambient water) > 0.75 x mean response (control water)

Where:

H_0 = null hypothesis

H_a = alternative hypothesis,

0.75 = regulatory management decision criterion (i.e., 75 percent)

H_0 means the ambient water is toxic when the test organism response in a bioassay is less than or equal to 75 percent of the control response;

H_a means the ambient water is not toxic when the test organism response is greater than 75 percent of the control response. For example, if an average of 75 percent of bioassay test organisms or fewer survive when exposed to ambient water relative to the average number that survive when exposed to control water, the ambient water is toxic (i.e., the test result is “fail”).

Conversely, if an average of more than 75 percent of bioassay test organisms survive relative to those exposed to control water, the ambient water is not toxic (i.e., the test result is “pass”).

4.3.2.6. **Sediment Quality Objectives.** The *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1, Sediment Quality* contains the following narrative water quality objectives:

4.3.2.6.1. “Pollutants in sediments shall not be present in quantities that, alone or in combination, are toxic to benthic communities in bays and estuaries of California.” This objective is to be implemented by integrating three lines of evidence: sediment toxicity, benthic community condition, and sediment chemistry. The policy requires that if the Regional Water Board determines that a discharge has reasonable potential to cause or contribute to an exceedance of this objective, it is to impose the objective as a receiving water limitation.

4.3.2.6.2. “Pollutants shall not be present in sediments at levels that will bioaccumulate in aquatic life to levels that are harmful to human health in bays and estuaries of California.” This objective is to be implemented by a three-tiered procedure based on pollutant concentrations in sediment and fish tissue.

4.3.2.6.3. “Pollutants shall not be present in sediment at levels that alone or in combination are toxic to wildlife and resident finfish by direct exposure or bioaccumulate in aquatic life at levels that are harmful to wildlife or resident finfish by indirect exposure in bays and estuaries of California.” This objective is to be implemented on a case-by-case basis, based upon an ecological risk assessment.

4.3.2.7. **Mercury Objectives.** The Mercury Provisions specify water column criteria for mercury depending on water body type and beneficial uses. San Lorenzo Creek and Alamo Canal are flowing water bodies that support cold freshwater habitat; warm freshwater habitat; preservation of rare, threatened,

or endangered species; and wildlife habitat beneficial uses. Mercury Provisions section IV.D.2.b, Table 1, establishes an annual average total mercury criterion of 0.012 µg/L for San Lorenzo Creek and Alamo Canal.

- 4.3.2.8. **Receiving Water Salinity.** Basin Plan section 4.6.2 (like the CTR and NTR) states that the salinity characteristics (i.e., freshwater vs. saltwater) of the receiving water are to be considered in determining the applicable water quality objectives. Freshwater criteria apply to discharges to waters with salinities equal to or less than one part per thousand (ppt) at least 95 percent of the time. Saltwater criteria apply to discharges to waters with salinities equal to or greater than 10 ppt at least 95 percent of the time in a normal water year. For discharges to water with salinities in between these two categories, or tidally-influenced freshwaters that support estuarine beneficial uses, the water quality objectives are the lower of the salt or freshwater criteria (the latter calculated based on ambient hardness) for each substance.

San Lorenzo Creek receives upstream freshwater flows but is tidally-influenced, being located approximately 3,000 feet upstream from Lower San Francisco Bay. However, under peak wet weather conditions, the receiving water is freshwater because of the large amount of stormwater flow upstream. Alamo Canal receives upstream freshwater flows. Because the receiving water is freshwater in San Lorenzo Creek and Alamo Canal during wet weather discharges, this Order's effluent limitations are based on the freshwater water quality objectives and criteria in the Basin Plan, NTR, and CTR.

- 4.3.2.9. **Receiving Water Hardness.** Ambient hardness data were used to calculate freshwater water quality objectives that are hardness dependent. The Discharger collected receiving water hardness data between January 1993 and March 2023 for San Lorenzo Creek and between March 1998 and March 2023. Within these data sets, 17 reflect freshwater conditions (i.e., salinity less than or equal to 1 ppt). The geometric means for the San Lorenzo Creek and Alamo Canal data sets are 278 mg/L and 252 mg/L. As a conservative approach, this Order uses the lower geometric mean of 252 mg/L to calculate the water quality objectives for both locations.
- 4.3.2.10. **Metals Translators.** Regulations at 40 C.F.R. section 122.45(c), require effluent limitations for metals to be expressed as total recoverable metal. Since the water quality objectives for metals are typically expressed as dissolved metal, translators must be used to convert metals concentrations from dissolved to total recoverable and vice versa. The CTR contains default translators; however, site-specific conditions, such as water temperature, pH, total suspended solids, and organic carbon may affect the form of metal (dissolved, non-filterable, or otherwise) present and therefore available to cause toxicity. In general, dissolved metals are more available and more

toxic to aquatic life than other forms. Site-specific translators can account for site-specific conditions, thereby preventing overly stringent or under-protective water quality objectives.

CTR default translators were used for all metals in this Order's reasonable potential analysis and WQBEL calculations.

4.3.3. Reasonable Potential Analysis

- 4.3.3.1. **Available Information.** The reasonable potential analyses for this Order are based on effluent data and ambient background monitoring data for San Lorenzo Creek and Alamo Canal the Discharger collected between November 2021 and November 2024.

SIP section 1.4.3 requires that background water quality data be representative of the ambient receiving water that will mix with the discharge. Background data used for this analysis were collected at Monitoring Locations RSW-002U, upstream of Discharge Point 002 and just outside the influence of the Discharger's effluent; RSW-003U, upstream of Discharge Point 003 and just outside the influence of the Discharger's effluent; and RSW-003D, downstream of Discharge Point 003.

This Order does not contain WQBELs for constituents that do not demonstrate reasonable potential; however, the MRP still requires monitoring for those pollutants. If effluent concentrations are found to have increased significantly, Provision 6.3.2 of the Order requires the Discharger to investigate the sources of the increases and implement remedial measures if the increases pose a threat to receiving water quality.

- 4.3.3.2. **Priority Pollutants.** SIP section 1.3 sets forth the methodology used to assess whether a priority pollutant has reasonable potential to exceed a water quality objective. The analysis begins with identifying the maximum effluent concentration (MEC) observed for each pollutant based on available effluent concentration data and the ambient background concentrations (B). SIP section 1.4.3 states that ambient background concentrations are either the maximum ambient concentration observed or, for water quality objectives intended to protect human health, the arithmetic mean of observed concentrations. There are three triggers in determining reasonable potential:

- **Trigger 1** is activated if the maximum effluent concentration is greater than or equal to the lowest applicable water quality objective ($MEC \geq$ water quality objective).
- **Trigger 2** is activated if the ambient background concentration observed in the receiving water is greater than the lowest applicable water quality objective ($B >$ water quality objective) and the pollutant is detected in any effluent sample.

- **Trigger 3** is activated if a review of other information indicates that a WQBEL is needed to protect beneficial uses.

The maximum effluent concentrations, most stringent applicable water quality criteria and objectives, and ambient background concentrations used in the analysis are presented below, along with the reasonable potential analysis results (yes, no, or unknown) for each pollutant.

Table F-7. Reasonable Potential Analysis

CTR No.	Priority Pollutants	C or Governing criterion or objective (µg/L)	MEC or minimum MDL (µg/L) [1][2]	B or MDL (µg/L) [1][2]	RPA Results [3]
1	Antimony	4300	0.41 DNQ	0.38	No
2	Arsenic	150	1.40	2.9	No
3	Beryllium	No Criteria	<0.09	0.15	No
4	Cadmium	1.40	<0.05	0.25	No
5a	Chromium (III) [4]	441	0.91	19	No
5b	Chromium (VI) [4]	11	0.91	Unavailable	No
6	Copper	20.6	11.0	11.0	No [5]
7	Lead	10.3	0.14 DNQ	58.00	Yes
8	Mercury [5]	-	-	-	[6]
9	Nickel	114	2.7	23	No
10	Selenium	3.1	0.65 DNQ	0.54 DNQ	No
11	Silver	19.9	<0.05	<0.05	No
12	Thallium	6.3	<0.05	0.11	No
13	Zinc	262	19	72	No
14	Cyanide	5.2	2.0 DNQ	0.92 DNQ	No [5]
15	Asbestos [6]	No Criteria	<0.53	<1.1	[7]
16	2,3,7,8-TCDD	1.3 x 10 ⁻⁸	<3.9 x 10 ⁻⁶	<3.8 x 10 ⁻⁶	No
17	Acrolein	780	<0.81	<0.81	No
18	Acrylonitrile	0.66	<0.75	<0.75	No
19	Benzene	71	<0.18	<0.18	No
20	Bromoform	360	<0.15	<0.15	No
21	Carbon Tetrachloride	4.4	<0.16	<0.16	No
22	Chlorobenzene	21000	<0.18	<0.18	No
23	Chlorodibromomethane	34	<0.17	<0.17	No
24	Chloroethane	No Criteria	<0.15	<0.15	U
25	2-Chloroethylvinyl ether	No Criteria	<0.36	<0.36	U
26	Chloroform	No Criteria	2.2	<0.17	U
27	Dichlorobromomethane	46	0.38 DNQ	<0.08	No
28	1,1-Dichloroethane	No Criteria	<0.15	<0.15	No
29	1,2-Dichloroethane	99	<0.17	<0.17	No
30	1,1-Dichloroethylene	3.2	<0.21	<0.21	No

Item No. 9 - Attachment

Livermore-Amador Valley Water Management Agency (LAVWMA)
LAVWMA Export and Storage Facilities
Intermittent Wet Weather Discharge

Order No. R2-2026-XXXX
NPDES Permit No. CA0038679

CTR No.	Priority Pollutants	C or Governing criterion or objective (µg/L)	MEC or minimum MDL (µg/L) [1][2]	B or MDL (µg/L) [1][2]	RPA Results [3]
31	1,2-Dichloropropane	39	<0.15	<0.15	No
32	1,3-Dichloropropylene	1700	<0.09	<0.09	No
33	Ethylbenzene	29000	<0.1	<0.1	No
34	Methyl Bromide	4000	<0.13	<0.13	No
35	Methyl Chloride	No Criteria	<0.13	<0.13	U
36	Methylene Chloride	1600	0.21 DNQ	<0.12	No
37	1,1,2,2-Tetrachloroethane	11	<0.15	<0.15	No
38	Tetrachloroethylene	8.85	<0.19	<0.19	No
39	Toluene	200000	0.21 DNQ	<0.19	No
40	1,2-Trans-Dichloroethylene	140000	<0.1	<0.1	No
41	1,1,1-Trichloroethane	No Criteria	<0.19	<0.19	No
42	1,1,2-Trichloroethane	42	<0.16	<0.16	No
43	Trichloroethylene	81	<0.20	<0.20	No
44	Vinyl Chloride	525	<0.25	<0.25	No
45	2-Chlorophenol	400	<0.90	<0.90	No
46	2,4-Dichlorophenol	790	<0.90	<0.90	No
47	2,4-Dimethylphenol	2300	<0.40	<0.40	No
48	2-Methyl- 4,6-Dinitrophenol	765	<2	<2	No
49	2,4-Dinitrophenol	14000	<2	<2	No
50	2-Nitrophenol	No Criteria	<0.5	<0.5	U
51	4-Nitrophenol	No Criteria	<1	<1	U
52	3-Methyl 4-Chlorophenol	No Criteria	<0.5	<0.5	U
53	Pentachlorophenol	8.2	<0.4	<0.4	No
54	Phenol	4600000	<0.3	<0.3	No
55	2,4,6-Trichlorophenol	6.5	<0.4	<0.4	No
56	Acenaphthene	2700	<0.02	<0.02	No
57	Acenaphthylene	No Criteria	<0.02	<0.02	U
58	Anthracene	110000	<0.03	<0.03	No
59	Benzidine	0.00054	<4	<4	No
60	Benzo(a)Anthracene	0.049	<0.05	<0.05	No
61	Benzo(a)Pyrene	0.049	<0.04	<0.04	No
62	Benzo(b)Fluoranthene	0.049	<0.05	<0.05	No
63	Benzo(ghi)Perylene	No Criteria	<0.05	<0.05	U
64	Benzo(k)Fluoranthene	0.049	<0.02	<0.02	No
65	Bis(2-Chloroethoxy)Methane	No Criteria	<0.5	<0.5	U
66	Bis(2-Chloroethyl)Ether	1.4	<0.9	<0.9	No
67	Bis(2-Chloroisopropyl)Ether	170000	<0.9	<0.9	No
68	Bis(2-Ethylhexyl)Phthalate	5.9	<0.5	<0.5	No
69	4-Bromophenyl Phenyl Ether	No Criteria	<0.5	<0.5	U

Item No. 9 - Attachment

Livermore-Amador Valley Water Management Agency (LAVWMA)
LAVWMA Export and Storage Facilities
Intermittent Wet Weather Discharge

Order No. R2-2026-XXXX
NPDES Permit No. CA0038679

CTR No.	Priority Pollutants	C or Governing criterion or objective (µg/L)	MEC or minimum MDL (µg/L) [1][2]	B or MDL (µg/L) [1][2]	RPA Results [3]
70	Butylbenzyl Phthalate	5200	<2	<2	No
71	2-Chloronaphthalene	4300	<1	<1	No
72	4-Chlorophenyl Phenyl Ether	No Criteria	<0.6	<0.6	U
73	Chrysene	0.049	<0.05	<0.05	No
74	Dibenzo(a,h)Anthracene	0.049	<0.05	<0.05	No
75	1,2-Dichlorobenzene	17000	<0.27	<0.27	No
76	1,3-Dichlorobenzene	2600	<0.18	<0.18	No
77	1,4-Dichlorobenzene	2600	<0.18	<0.18	No
78	3,3-Dichlorobenzidine	0.077	<5	<5	No
79	Diethyl Phthalate	120000	<0.5	<0.5	No
80	Dimethyl Phthalate	2900000	<0.5	<0.5	No
81	Di-n-Butyl Phthalate	12000	<0.4	<0.4	No
82	2,4-Dinitrotoluene	9.1	<0.9	<0.9	No
83	2,6-Dinitrotoluene	No Criteria	<0.4	<0.4	U
84	Di-n-Octyl Phthalate	No Criteria	<0.4	<0.4	U
85	1,2-Diphenylhydrazine	0.54	<0.5	<0.5	No
86	Fluoranthene	370	<0.02	<0.02	No
87	Fluorene	14000	<0.02	<0.02	No
88	Hexachlorobenzene	0.00077	<1	<1	No
89	Hexachlorobutadiene	50	<0.4	<0.4	No
90	Hexachlorocyclopentadiene	17000	<0.9	<0.9	No
91	Hexachloroethane	8.9	<0.4	<0.4	No
92	Indeno(1,2,3-cd)Pyrene	0.049	<0.05	<0.05	No
93	Isophorone	600	<0.5	<0.5	No
94	Naphthalene	No Criteria	<0.02	<0.02	U
95	Nitrobenzene	1900	<0.5	<0.5	No
96	N-Nitrosodimethylamine	8.1	<0.07	<0.7	No
97	N-Nitrosodi-n-Propylamine	1.4	<0.5	<0.5	No
98	N-Nitrosodiphenylamine	16	<0.7	<0.7	No
99	Phenanthrene	No Criteria	<0.02	<0.02	U
100	Pyrene	11000	<0.02	<0.02	No
101	1,2,4-Trichlorobenzene	No Criteria	<0.4	<0.4	No
102	Aldrin	0.00014	<0.0030	<0.003	No
103	Alpha-BHC	0.013	<0.0026	<0.0026	No
104	Beta-BHC	0.046	<0.0040	<0.004	No
105	Gamma-BHC	0.063	<0.0030	<0.003	No
106	Delta-BHC	No Criteria	<0.0020	<0.002	U
107	Chlordane	0.00059	<0.0030	<0.003	No
108	4,4'-DDT	0.00059	<0.0040	<0.004	No

CTR No.	Priority Pollutants	C or Governing criterion or objective (µg/L)	MEC or minimum MDL (µg/L) ^{[1][2]}	B or MDL (µg/L) ^{[1][2]}	RPA Results ^[3]
109	4,4'-DDE (linked to DDT)	0.00059	<0.0010	<0.001	No
110	4,4'-DDD	0.00084	<0.0010	<0.001	No
111	Dieldrin	0.00014	<0.0020	<0.002	No
112	Alpha-Endosulfan	0.056	<0.0040	<0.004	No
113	Beta-Endosulfan	0.056	<0.0040	<0.004	No
114	Endosulfan Sulfate	240	<0.0030	<0.003	No
115	Endrin	0.036	<0.0030	<0.003	No
116	Endrin Aldehyde	0.81	<0.0040	<0.004	No
117	Heptachlor	0.00021	<0.0040	<0.004	No
118	Heptachlor Epoxide	0.00011	<0.0010	<0.001	No
119-125	PCBs sum ^[5]	-	-	-	-
126	Toxaphene	0.0002	<0.4	<0.4	No

Footnotes:

- ^[1] The MEC and ambient background concentration are the actual detected concentrations unless preceded by a "<" sign, in which case the value shown is the minimum method detection limit (MDL).
- ^[2] The MEC or ambient background concentration is "Unavailable" when there are no monitoring data for the constituent.
- ^[3] RPA Results = Yes, if MEC ≥ WQC, B > WQC and MEC is detected, or Trigger 3
= No, if MEC and B are < WQC or all effluent data are undetected
= Unknown (U) if no criteria have been promulgated, data are insufficient, or all effluent data are undetected
= effluent MDL > WQC.
- ^[4] The MEC and maximum ambient background concentrations are the total chromium concentration. The chromium (III) and chromium (VI) concentrations are unknown but less than these values.
- ^[5] SIP section 1.3 excludes from its reasonable potential analysis procedure priority pollutants for which a TMDL has been developed. TMDLs have been developed for mercury and PCBs in San Francisco Bay, of which San Lorenzo Creek and Alamo Canal are tributaries. Mercury and PCBs from wastewater discharges are regulated by NPDES Permit CA0038849, which implements the San Francisco Bay Mercury and PCBs TMDLs.
- ^[6] The Mercury Provisions established freshwater objectives that apply to San Lorenzo Creek and Alamo Canal. However, consistent with the Mercury Provisions, the Discharger has no reasonable potential to cause an exceedance in the objectives because discharges are infrequent and insignificant, and the objectives protect against annual average exposure.
- ^[7] The Discharger is not required to sample for asbestos because it does not have reasonable potential to cause or contribute to an exceedance of this objective (see Fact Sheet section 4.3.3.9).

4.3.3.3. Ammonia

4.3.3.3.1. Methodology. Ammonia is a toxic pollutant but not a priority pollutant as defined by the CTR; therefore, the procedure outlined in the *Technical Support document for Water Quality-Based Toxics Control* (Technical Support Document) (EPA/505/2-90-001, March 1991) was used to determine if ammonia in the discharge has reasonable potential to cause a water quality objective to be exceeded in the receiving water. According to the Technical Support Document, the reasonable potential analyses can be performed based on the receiving water concentrations projected using effluent data or measured receiving water concentrations. Both values may be compared directly to the Basin Plan un-ionized ammonia objectives (see Fact Sheet section 4.3.2.1.1).

The following steps summarize the process for determining reasonable potential for a pollutant using the effluent data set:

- **Step 1.** Determine the total number of samples (n) and the maximum effluent concentration (MEC) in the dataset.
- **Step 2.** Determine the coefficient of variation (CV). For a data set where $n < 10$, the CV is estimated to equal 0.6. For a dataset where $n \geq 10$, the CV is calculated as the standard deviation divided by the mean.
- **Step 3.** Determine a ratio (R) for projecting the upper bound concentration based on a selected confidence interval (e.g., 95th or 99th percentile) and assuming a lognormal distribution as follows:

Calculate the percentile (P_n) represented by the MEC in the data set of n samples based on the selected confidence level.

$$P_n = (1 - \text{confidence interval})^{1/n}$$

Calculate the concentration-multiplying factors (C_P) for the MEC percentile (P_n) and the chosen upper bound percentile ($P_{\text{upper bound}}$), typically the 99th percentile, using the following equation:

$$C_P = \exp(Z_P \sigma - 0.5 \sigma^2)$$

Where: $\sigma^2 = \ln(\text{CV}^2 + 1)$

P is the percentile (either P_n or the selected $P_{\text{upper bound}}$)

Z_p is the standard normal distribution value for the percentile P (available from statistical references)

Finally, calculate R as:

$$R = C_{\text{upper bound}} / C_{P_n}$$

- **Step 4.** Calculate the projected maximum receiving water concentration (RWC) as follows:

$$\text{RWC} = (\text{MEC} \times R) / \text{dilution ratio}$$

The dilution ratio can be defined as:

$$\text{Dilution ratio} = (D + [1 \text{ part effluent}]) / (1 \text{ part effluent})$$

Where D is the parts receiving water available to dilute 1 part effluent

Therefore:

$$RWC = (MEC \times R) / (D + 1)$$

- **Step 5.** Compare the RWC to the most stringent water quality objective for the pollutant. There is reasonable potential if the RWC is greater than or equal to the lowest applicable water quality objective.

4.3.3.3.2. Analysis

- 4.3.3.3.2.1. **Ammonia Mixing Zone and Dilution Credit.** The Technical Support Document allows for mixing zones and dilution credits to be considered when conducting a reasonable potential analysis. This Order authorizes an ammonia mixing zone corresponding to a dilution credit of 4:1 (4 parts total water [mixed effluent plus receiving water] to 1 part effluent; D=3) at Discharge Points 002 and 003 in accordance with SIP section 1.4.2.2. The receiving water concentration was assumed to be the same as the projected upper bound concentration, i.e., $RWC = (MEC \times R) / (D + 1)$ (see Step 4 above).

The Discharger's mixing zone study, *Mixing Zone Analysis for Wet Weather Discharges* (RMC, December 8, 2010) proposed two mixing zones with boundaries beginning at the discharge outfalls, Discharge Points 002 (San Lorenzo Creek) and 003 (Alamo Canal), and ending at downstream stormwater outfalls that result in complete mixing of the discharge.

For San Lorenzo Creek, the mixing zone covered 4,000 square feet (i.e., 50 feet downstream from the outfall and encompassed the entire width [80 feet] and depth of the creek). At 50 feet downstream from Discharge Point 002, the Alameda County Flood Control and Water Conservation District operates a pump station and flood control stormwater outfall that results in complete mixing of the discharge. This mixing zone, shown in Figure 1 below, corresponded to a dilution credit of D=10 (the dilution ratio is 11:1, or one part effluent to 11 parts effluent plus receiving water).

For Alamo Canal, the mixing zone covered 6,400 square feet (i.e., 200 feet downstream from the outfall and encompassing the entire width [32 feet] and depth of the canal). A stormwater outfall at 200 feet downstream from Discharge Point 003 results in complete mixing of the discharge. This mixing zone, shown in Figure 2 below, corresponds to a dilution credit of D=14 (the dilution ratio is 15:1).

Figure 1. Aerial View of the San Lorenzo Creek Mixing Zone



Figure 2. Aerial View of the Alamo Canal Mixing Zone



The ammonia mixing zone meets the requirements of SIP section 1.4.2.2.A and the Technical Support Document because it does not do any of the following:

- 4.3.3.3.2.1.1. **Compromise the integrity of the water body.** The mixing zones would not compromise the integrity of San Lorenzo Creek or Alamo Canal because they are small relative to the sizes of the receiving waters. Modeled above, they correspond to a dilution ratio of 11:1 and 15:1 and cover only 1.7 percent of San Lorenzo Creek and 2.1 percent of Alamo Canal.
- 4.3.3.3.2.1.2. **Cause acute toxicity to aquatic life passing through the mixing zone.** Acutely toxic conditions would not exist inside the mixing zones because, during wet weather, the estimated travel times for organisms that drift or swim through them would be less than one minute. This is less than the 24-hour exposure time upon which the Basin Plan's acute ammonia water quality objective is based, and is more protective than guidance in the Technical Support Document, which states that travel time through a mixing zone should be less than 15 minutes if the mixing zone is based on water quality criteria expressed in terms of a 1-hour exposure. Furthermore, the Discharger's effluent is subject to acute toxicity requirements for the EBDA common outfall as set forth in NPDES Permit CA0037869.
- 4.3.3.3.2.1.3. **Restrict the passage of aquatic life.** The mixing zones would not interfere with the movement of aquatic species or restrict the passage of aquatic life because, during storms, potential exposure times for aquatic species drifting or swimming downstream through the mixing zones would be less than one minute. Moreover, discharges will be of short duration and thus have little effect on passage of aquatic life heading upstream.
- 4.3.3.3.2.1.4. **Adversely impact biologically sensitive or critical habitats, including, but not limited to, habitats of species under federal or State endangered species laws.** The mixing zones would not adversely affect biologically sensitive or critical habitats because of the short and infrequent nature of the discharges (at most, approximately once every 1.5 years in San Lorenzo Creek and approximately once every 10 years in Alamo Canal). Furthermore, toxic, un-ionized ammonia is expected to attenuate rapidly to safe levels.

In San Lorenzo Creek, the area surrounding the wet weather outfall consists primarily of intertidal mudflats and low vegetated riverine banks that do not provide critical habitat to any State or federally-listed endangered or sensitive species. The estuarine portion of San

Lorenzo Creek, where the outfall is located, and adjacent areas provide habitat to the endangered Ridgway's rail, but this habitat is outside of the mixing zone. Upstream, San Lorenzo Creek provides habitat for juvenile and adult steelhead trout.

In Alamo Canal, the area surrounding the wet weather outfall to Alamo Canal consists primarily of steep vegetated riverine banks with introduced grasses and no riparian cover. Potential habitat exists for special status wildlife species, including Ricksecker's water scavenger beetle, the curved-foot hygrotus diving beetle, and the western pond turtle.

- 4.3.3.3.2.1.5. **Produce undesirable or nuisance aquatic life** The mixing zone will not produce undesirable or nuisance aquatic life because the effluent receives secondary treatment and disinfection prior to discharge. This Order also requires the Discharger to conduct standard observations after each discharge event to ensure nuisance conditions are not present.
- 4.3.3.3.2.1.6. **Result in floating debris, oil, or scum.** The mixing zones would not result in floating debris, oil, or scum. The Dublin San Ramon Services District and City of Livermore wastewater treatment plants are equipped with scum baffles (collection devices) that collect and dispose of debris, oil, and scum. In addition, the treatment plants have screens that remove any remaining floatables from the effluent. This Order also requires the Discharger to conduct standard observations after each discharge event to ensure floating debris, oil, or scum are not present.
- 4.3.3.3.2.1.7. **Produce objectionable color, odor, taste, or turbidity.** The mixing zones would not produce objectionable color, odor, taste, or turbidity because the effluent receives secondary treatment and is disinfected prior to discharge. Secondary treatment addresses objectionable odor, taste, and turbidity through the biological degradation of organic compounds and clarification. This Order also requires the Discharger to conduct standard observations after each discharge event to ensure objectionable color, odor, or turbidity are not present.
- 4.3.3.3.2.1.8. **Cause objectionable bottom deposits.** The SIP defines objectionable bottom deposits as an accumulation of materials or substances on or near the bottom of a water body that creates conditions adversely affecting aquatic life, human health, beneficial uses, or aesthetics. These conditions include, but are not limited to, the accumulation of pollutants in sediments and other conditions that result in harm to benthic organisms, production of food chain organisms, or fish egg development. The mixing zone will not cause

objectionable bottom deposits because the effluent receives secondary treatment, which biologically degrades and removes suspended particles that could contribute to receiving water bottom deposits. Ammonia does not bind to particles and is therefore unlikely to accumulate in sediment.

4.3.3.3.2.1.9. **Cause nuisance.** The mixing zones will not cause nuisance as defined by California Water Code section 13050, where “nuisance” means anything that (1) is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property; (2) affects at the same time an entire community or neighborhood, or any considerable number of persons; and (3) occurs during, or as a result of, the treatment or disposal of wastes. The effluent discharged receives secondary treatment and is disinfected prior to discharge. This Order also requires the Discharger to conduct standard observations after each discharge event to ensure nuisance conditions are not present.

4.3.3.3.2.1.10. **Dominate the receiving water body or overlap a mixing zone from a different outfall.** The mixing zones would not dominate the receiving waters (see Fact Sheet section 4.3.4.2 and Figures 1 and 2, above) or overlap any other mixing zones. As discussed above in Fact Sheet section 4.3.4.2.1, the mixing zones represent relatively small portions of the receiving waters, covering less than 1.7 percent of San Lorenzo Creek and less than 2.1 percent of Alamo Canal. The Regional Water Board has not established any other mixing zones nearby.

4.3.3.3.2.1.11. **Be located at or near any drinking water intake.** There are no drinking water intakes near the mixing zones. In San Lorenzo Creek, the mixing zone is located in a tidally influenced segment that is not generally suitable for drinking water supplies.

SIP section 1.4.2.2 requires that mixing zones be as small as practicable. While the Discharger proposed ammonia mixing zones corresponding to dilution ratios as high as 15:1, the mixing zones this Order authorizes are smaller. They are based on a dilution ratio of 4:1, which is the smallest dilution credit ($D=3$) that results in un-ionized ammonia effluent limitations the Discharger can reasonably comply with. Therefore, the mixing zones also comply with all regulatory requirements.

4.3.3.3.2.2. **Two Approaches.** According to the Technical Support Document, the reasonable potential analysis can be performed based on the RWC projected using effluent data (the steps summarized above) or actual

measured RWCs. Both values may be compared directly with Basin Plan un-ionized objectives.

- 4.3.3.3.2.2.1. **Analysis Based on Effluent Data.** Effluent total ammonia as nitrogen, pH, and temperature data collected in November 2021, March and December 2023, and November 2024 were used to evaluate reasonable potential for ammonia. Based on this data set of $n = 4$ with a calculated un-ionized ammonia MEC of 0.29 mg/L, P_n at a 99 percent confidence interval is 0.32, indicating the MEC represents the 96th percentile of the ammonia effluent data. With the upper bound set at the 99th percentile, R is 3.8 (C_{Pn} was 0.83 and $C_{upper bound}$ was 3.1), the projected RWC is 0.27 mg/L which is less than the Basin Plan's acute un-ionized ammonia water quality objective of 0.4 mg/L. Therefore, there is no reasonable potential for ammonia based on the effluent data.
- 4.3.3.3.2.2.2. **Analysis Based on Receiving Water Data.** Total ammonia, pH, salinity, and temperature data were collected at Monitoring Location RSW-003D, just downstream of Discharge Point 003, on March 29, 2023, to evaluate reasonable potential for ammonia. The maximum calculated un-ionized ammonia concentration of 0.002 mg/L is less than the acute water quality objective of 0.4 mg/L. Therefore, there is no reasonable potential for ammonia based on the receiving water data.
- 4.3.3.3.3. **Conclusion.** The analyses based on effluent and receiving water data conclude there is no reasonable potential for ammonia to exceed the acute water quality objective of 0.4 mg/L. Therefore, this Order does not include total ammonia effluent limitations.
- 4.3.3.4. **Total Residual Chlorine.** There is reasonable potential to cause or contribute to an exceedance of the Basin Plan's narrative toxicity objective because the Facility receives wastewater disinfected with chlorine that it may discharge during wet weather events and will discharge during discharge exercises. Without sufficient dechlorination, the discharge could contain chlorine in concentrations that are acutely toxic to aquatic organisms.
- 4.3.3.5. ***Escherichia Coliform Bacteria.*** The *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Part 3, Bacteria Provisions and a Water Quality Standards Variance Policy* requires *Escherichia* coliform bacteria effluent limitations for discharges to freshwater receiving waters that support the water contact recreation (REC1) beneficial use.
- 4.3.3.6. **Toxicity.** Toxicity Provisions section III.C.11 exempts insignificant non-stormwater discharges from acute and chronic toxicity requirements if they do not have reasonable potential to cause or contribute to the

exceedance of toxicity water quality objectives. In accordance with Toxicity Provisions section III.C.11, reasonable potential analysis does not need to include the analysis methods in Toxicity Provisions section III.C.3. The discharges covered by this Order are insignificant and do not have reasonable potential to cause or contribute to the exceedance of toxicity water quality objectives because wet weather discharges are rare (expected to occur about 1.5 times per year at San Lorenzo Creek and once every 10 years at Alamo Canal), and discharge exercises can occur no more than twice per year from Discharge Point 002 and no more than once per year from Discharge Point 003. Moreover, toxicity is indirectly limited as part of the Discharger's requirements for discharges to the EBDA common outfall as set forth in NPDES Permit CA0037869. As required by the Toxicity Provisions, discharges covered by this Order may not cause an exceedance of water quality objectives for aquatic toxicity in receiving waters (see section 5 of the Order).

- 4.3.3.7. **Sediment Quality.** Pollutants in some receiving water sediments may be present in quantities that alone or in combination are toxic to benthic communities. The Sediment Quality Plan states that effluent limitations to protect sediment quality are to be developed when: (1) a direct relationship between the discharge and degraded sediment has been established; (2) the pollutants causing degradation have been identified; and (3) the reductions in pollutant loading needed to restore sediment quality have been estimated.

However, to date there is no evidence directly linking compromised sediment conditions to the discharges subject to this Order; therefore, the Regional Water Board does not find reasonable potential for these discharges to cause or contribute to exceedances of the sediment quality objectives. Nevertheless, the Discharger continues to participate in the Regional Monitoring Program, which routinely monitors San Francisco Bay sediment and seeks to identify stressors responsible for degraded sediment quality.

- 4.3.3.8. **Temperature.** San Lorenzo Creek and Alamo Canal support warm water and cold water habitat beneficial uses; therefore, the temperature water quality objectives in Basin Plan section 3.3.17 apply:

- The natural receiving water temperature of inland surface waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses.
- The temperature of any cold or warm freshwater habitat shall not be increased by more than 5°F (2.8°C) above natural receiving water temperature.

Effluent and receiving water monitoring conducted on May 2020 for San Lorenzo Creek and March 2023 for Alamo Canal showed no significant difference in temperature between effluent and the upstream monitoring stations. In San Lorenzo Creek, effluent temperature was approximately 4°C cooler than the ambient temperature. In Alamo Canal, the temperature of the receiving water 100 feet downstream of the discharge point was approximately 0.8°C lower than the ambient temperature. Additionally, discharges to San Lorenzo Creek and Alamo Canal occur intermittently and only during peak wet weather events when flows in the receiving waters are elevated. With increased dilution and flushing of the discharge within the receiving waters, wet weather discharges are unlikely to affect the ambient temperatures of San Lorenzo Creek and Alamo Canal, particularly on a long-term basis. Therefore, there is no reasonable potential for the discharge to alter natural receiving water temperatures or increase the ambient temperatures by greater than 2.8°C.

- 4.3.3.9. **Municipal and Domestic Supply Pollutants.** San Lorenzo Creek has a beneficial use for municipal and domestic supply (MUN). Basin Plan section 3.3.22 sets forth maximum contaminant levels as water quality objectives to protect this beneficial use. However, because Facility discharges are expected to be short and intermittent, there is no reasonable potential for these discharges to cause or contribute to exceedances of these objectives, which were established to prevent impacts from exposure periods greater than the Discharger's projected discharge frequency of once every 1.5 years. The objectives to protect the MUN beneficial use are intended to protect against annual average exposure periods.

Additionally, ambient receiving water sampling conducted by the Discharger indicates that San Francisco Bay's tidal influence does not allow suitable waters for municipal and domestic supply in the portion of San Lorenzo Creek that receives the Facility's discharge. In May 2020, TDS and specific conductance samples taken upstream of the Discharger's wet weather outfall (Discharge Point 002) were 7,800 mg/L and 13,000 µS/cm, well above thresholds established in State Water Board Resolution 88-63 that exempt waters from being considered suitable or potentially suitable for municipal and domestic supply. Therefore, there is no reasonable potential for Facility discharges to cause exceedances of water quality objectives that protect the MUN beneficial use because the receiving waters are not suitable for municipal and domestic supply.

- 4.3.3.10. **Total Dissolved Solids (TDS) and Chlorides.** Basin Plan Table 3-7 contains TDS and chlorides objectives for Alameda Creek and its tributaries above Niles, including Alamo Canal. These objectives are based on historic South Bay Aqueduct water quality to prevent degradation by imported aqueduct water used for groundwater recharge during dry weather periods, when Alameda Creek consists primarily of aqueduct water and the

groundwater basin is not saturated. Because discharges to Alamo Canal are small, intermittent and occur only during peak wet weather events when Alamo Canal flows are high and the groundwater basin is already saturated, these discharges are unlikely to affect groundwater quality. Therefore, there is no reasonable potential for TDS and chlorides to exceed water quality objectives.

- 4.3.3.11. **Narrative Water Quality Objectives.** Basin Plan chapter 3 includes narrative water quality objectives for all surface waters within the region, except the Pacific Ocean. Where reasonable potential is found, the Basin Plan requires these objectives to be translated into effluent limitations.
- 4.3.3.11.1. Basin Plan section 3.3.2 requires that controllable water quality factors not cause a detrimental increase in the concentration of bioaccumulative, toxic substances in bottom sediments or aquatic life. The Regional Water Board is implementing this narrative objective by using an indicator parameter, 2,3,7,8-TCDD, for these bioaccumulative pollutants of concern. As shown in Table F-7, this Order does not find reasonable potential for 2,3,7,8-TCDD. Additionally, the discharges are infrequent and intermittent (wet weather discharges are expected to occur no more than 1.5 times per year; discharge exercises can occur no more than twice per year) and are short in duration and generally small in volume. Discharges of this nature are not expected to cause detrimental effects on bottom sediments and aquatic life.
- 4.3.3.11.2. Basin Plan section 3.3.3 requires that the receiving water not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses. The discharge is subject to the requirements of NPDES Permit CA0038873 (*Nutrient Watershed Permit*), which establishes effluent limitations for nitrogen due to finding reasonable potential for biostimulatory substances. These limitations should prevent aquatic growths to the extent that such growths could create a nuisance or adversely affect beneficial uses.
- 4.3.3.11.3. Basin Plan section 3.3.4 requires that discharges be free of coloration that causes nuisance or adversely affects beneficial uses. As stated in section 4.1.2.1.4, the effluent discharged receives secondary treatment and does not contain objectionable color, odor, taste, or turbidity. Therefore, there is no reasonable potential to exceed this narrative objective. Further, the technology-based effluent limitations in this Order, including those for TSS, are sufficient to prevent an excursion above this narrative water quality objective in the receiving water. See Fact Sheet section 4.2.2.

- 4.3.3.11.4. Basin Plan section 3.3.5 establishes that dissolved oxygen for tidal waters downstream of Carquinez Bridge remain above 5.0 mg/L, and that the median dissolved oxygen concentration for any three consecutive months not be less than 80 percent of the dissolved oxygen content at saturation. When natural factors cause concentrations less than that specified above, the discharge shall not cause further reduction in ambient dissolved oxygen concentrations.

The discharges covered by this Order are infrequent (no more than 1.5 times per year) and are expected to occur under wet weather conditions that will generate sufficient dissolved oxygen due to the mixing of effluent with higher flow in the receiving waters. The technology-based effluent limitations in this Order for CBOD₅ are also sufficient to prevent an excursion below the dissolved oxygen water quality objective of 5.0 mg/L. Furthermore, the Discharger has not caused or contributed to a violation of dissolved oxygen objectives. This conclusion is supported by a receiving water sample the Discharger collected in Alamo Canal on March 29, 2023, during a discharge exercise. Dissolved oxygen data from Receiving Water Monitoring Location RSW-003D (100 feet downstream of the discharge point) was used to evaluate reasonable potential for dissolved oxygen. The receiving water dissolved oxygen concentration of 14 mg/L was greater than the objective of 5.0 mg/L, which applies to tidal water downstream of Carquinez Bridge. Therefore, there is no reasonable potential for the discharge to decrease or increase dissolved oxygen concentrations beyond the water quality objectives in the receiving water.

- 4.3.3.11.5. Basin Plan section 3.3.6 requires that discharges not contain floating material, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses. The effluent discharged receives secondary treatment and does not contain floating debris, oil, or scum; therefore, there is no reasonable potential for the discharge to contribute to floating material in the receiving water.
- 4.3.3.11.6. Basin Plan section 3.3.7 requires that discharges not contain visible, floating, suspended, or deposited oil or other products of petroleum origin. The effluent discharged receives secondary treatment and does not contain petroleum products; therefore, there is no reasonable potential for the discharge to contribute to visible, suspended, or deposited oil or other petroleum products in the receiving water.
- 4.3.3.11.7. Basin Plan section 3.3.8 requires that the receiving water remain free of toxic substances in concentrations that are lethal to or that produce significant alterations in population or community ecology or receiving water biota. There is no reasonable potential for toxicity because the discharges covered by this Order are insignificant, consistent with Toxicity Provisions Section III.C.11. The discharges are infrequent and intermittent

(wet weather discharges are expected to occur no more than 1.5 times per year; discharge exercises can occur no more than twice a year) and are short in duration and generally small in volume. See Fact Sheet section 4.3.3.6.

- 4.3.3.11.8. Basin Plan section 3.3.9 requires that pH not be depressed below 6.5 nor raised above 8.5 in the receiving water, and that discharges not cause changes greater than 0.5 pH units in normal ambient pH levels. Based on effluent monitoring data in Table F-2, there is no reasonable potential to exceed this narrative objective. Furthermore, the technology-based effluent limitations in this Order for pH are sufficient to prevent an excursion above this water quality objective. See Fact Sheet section 4.2.2.2.
- 4.3.3.11.9. Basin Plan section 3.3.10 requires that radioactive material not be present in concentrations that result in the accumulation of radionuclides in the food web that would present hazards to human, plant, animal, or aquatic life. The Dublin San Ramon Services District Municipal Code Chapter 5.20 and Livermore Municipal Code Chapter 13.32.060 prohibit the discharge of radioactive wastes except in compliance with all applicable state or federal regulations. Therefore, there is no reasonable potential for radioactive material to be present in the discharge in hazardous concentrations.
- 4.3.3.11.10. Basin Plan section 3.3.11 requires that discharges not increase the total dissolved solids or salinity of receiving waters so as to adversely affect beneficial uses. Receiving water monitoring from the previous order term showed a salinity of 0.42 parts per thousand (ppt), while the typical salinity for sewage treatment plant effluent ranges from 0.5 to 1.5 ppt, depending on influent conditions. Further, discharges will be infrequent (no more than 1.5 times per year), intermittent, and short in duration, and will occur when the receiving waters have sufficient flow to mix and dilute the discharge. Therefore, there is no reasonable potential for the discharge to significantly increase total dissolved solids or salinity in the receiving water.
- 4.3.3.11.11. Basin Plan section 3.3.12 requires that discharges not alter suspended sediment in such a manner as to cause nuisance or adversely affect beneficial uses or detrimental increase in the concentrations of toxic pollutants in sediments or aquatic life. The technology-based effluent limitations in this Order, including those for TSS, are sufficient to prevent an excursion above the water quality objective; therefore, there is no reasonable potential for the discharge to detrimentally alter suspended sediment in the receiving water. See Fact Sheet section 4.2.2.

- 4.3.3.11.12. Basin Plan section 3.3.13 requires that discharges not cause bottom deposits or aquatic growths to the extent that such deposits or growths cause nuisance or adversely affect beneficial uses. The technology-based effluent limitations in this Order, including those for TSS, are sufficient to prevent an excursion above the water quality objective. See Fact Sheet section 4.2.2. Additionally, the Discharger is subject to the requirements of NPDES Permit CA0038873 (Nutrient Watershed Permit), which establishes effluent limitations for total inorganic nitrogen to prevent aquatic growths to the extent that such growths could cause a nuisance or affect uses; therefore, there is no reasonable potential for the discharge to cause bottom deposits or aquatic growths.
- 4.3.3.11.13. Basin Plan section 3.3.14 requires that discharges not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses. The technology-based effluent limitations in this Order, including those for TSS, are sufficiently protective to protect water quality, and more stringent water quality-based effluent limitations are not needed to prevent excursions of this narrative objective. See Fact Sheet section 4.2.2.
- 4.3.3.11.14. Basin Plan section 3.3.15 requires that discharges be free of dissolved sulfides above natural background levels. Sulfides cannot exist to a significant degree in an oxygenated environment, and this Order contains a technology-based effluent limitation for CBOD that will protect dissolved oxygen levels near the discharge point. Further, the most significant discharges will occur during extreme wet weather events, when there are high flows and heavy mixing in the receiving waters. Therefore, there is no reasonable potential for the discharge to contain sulfide concentrations above the background levels of the receiving water.
- 4.3.3.11.15. Basin Plan section 3.3.16 requires that discharges not contain taste- or odor-producing substances that impart undesirable tastes or odors to edible products of aquatic origin, that cause nuisance, or that adversely affect beneficial uses. As stated in section 4.1.2.1.4, the effluent discharged receives secondary treatment and does not contain objectionable color, odor, taste, or turbidity; therefore, there is no reasonable potential to exceed this narrative objective. Further, the technology-based effluent limitations in this Order, including those for TSS, are sufficient to prevent an excursion above this narrative objective in the receiving water. See Fact Sheet section 4.2.2.
- 4.3.3.11.16. Basin Plan section 3.3.17 requires that discharges not alter temperature beyond present natural background levels unless it can be demonstrated that such alteration in temperature does not adversely affect beneficial uses. Based on data collected at Receiving Water Monitoring Locations RSW-002U and RSW-003U and Monitoring Location EFF-001, there is no

reasonable potential for the discharge to the receiving waters to exceed the natural receiving water temperature by more than 20°F. The effluent temperature range (64 to 68°F) was within 20°F of the receiving water temperature (52°F).

- 4.3.3.11.17. Basin Plan section 3.3.19 requires that discharges be free of changes in turbidity that cause nuisance or adversely affect beneficial uses, or increases from normal background light penetration or turbidity greater than 10 percent in areas where natural turbidity is greater than 50 nephelometric turbidity units, or above 55 nephelometric turbidity units in areas where natural turbidity is less than or equal to 50 nephelometric turbidity units. The technology-based effluent limitations in this Order, including those for TSS, are sufficient to prevent an excursion above this narrative objective in the receiving waters. See Fact Sheet section 4.2.2.

4.3.4. **Water Quality-Based Effluent Limitations**

WQBELs were developed for the pollutants determined to have reasonable potential to cause or contribute to exceedances of water quality objectives. With the exception of those for *Escherichia* coliform bacteria and chlorine, the WQBEL calculations are based on the procedures in SIP section 1.4.

- 4.3.4.1. **WQBEL Expression.** NPDES regulations at 40 C.F.R. section 122.45(d) require that permit limitations for publicly-owned treatment works be expressed as average weekly and average monthly limitations, unless impracticable. This Order contains daily limitations instead of weekly limitations because daily limitations better protect against acute water quality effects and are necessary to prevent fish kills or mortality to aquatic organisms. Weekly limitations could allow acute and chronic toxicity to occur over shorter periods (acute and chronic aquatic life criteria are typically expressed as one-hour and four-day averages).
- 4.3.4.2. **Mixing Zones and Dilution Credits.** SIP section 1.4.2 and Basin Plan section 4.5.1 and 4.6.1.2 allow mixing zones and dilution credits under certain circumstances. While this Order grants a small mixing zone for ammonia, this is reasonable because ammonia will rapidly attenuate to a less toxic form.
- 4.3.4.3. **WQBEL Calculations.** The following table shows the WQBEL calculations for lead in accordance with SIP section 1.4:

Table F-8. WQBEL Calculations

Pollutant	Lead
Units	µg/L
Basis and Criteria type	Basin Plan Site-Specific Objective
Criteria - Acute	265
Criteria - Chronic	10
Site-Specific Objective Criteria - Acute	-
Site-Specific Objective Criteria - Chronic	-
Water Effects Ratio (WER)	1
Lowest WQO	10
Site Specific Translator - MDEL	-
Site Specific Translator - AMEL	-
Dilution Factor (D)	0
Number of samples per month	4
Aquatic life criteria analysis required? (Y/N)	Y
Human Health criteria analysis required? (Y/N)	N
Applicable Acute WQO	265
Applicable Chronic WQO	10
Human Health Criteria	-
Background (Maximum Concentration for Aquatic Life Calculation)	58
Background (Average Concentration for Human Health Calculation)	-
Is the pollutant on the 303d list and/or bioaccumulative (Y/N)?	N
Effluent Concentration Allowance Acute	265
Effluent Concentration Allowance Chronic	10
Effluent Concentration Allowance Human Health	-
Number of data points <10 or at least 80% of data reported non-detect? (Y/N)	N
Average of effluent data points	0.14
Standard Deviation of effluent data points	N/A
Coefficient of Variation Calculated	0.6
Coefficient of Variation (Selected) - Final	0.6
Effluent Concentration Allowance Acute Mult99	0.32
Effluent Concentration Allowance Chronic Mult99	0.53
Long-Term Average Acute	85
Long-Term Average Chronic	5.4
Minimum of Long-Term Average	5.4

Pollutant	Lead
AMEL Mult95	1.6
MDEL Mult99	3.1
AMEL (Aquatic Life)	8.4
MDEL (Aquatic Life)	17
MDEL/AMEL Multiplier	2
AMEL (Human Health)	-
MDEL (Human Health)	-
Minimum of AMEL for Aquatic Life vs Human Health	8.4
Minimum of MDEL for Aquatic Life vs Human Health	17
Previous Order Limitation - AMEL	-
Previous Order Limitation - MDEL	-
Final Limitation - AMEL	8.4
Final Limitation - MDEL	17

- 4.3.4.4. **Escherichia Coliform Bacteria.** The *Escherichia* coliform effluent limitation is based on the *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Part 3, Bacteria Provisions and a Water Quality Standards Variance Policy*, which requires weekly geometric mean and 90th percentile limitations for discharges to receiving waters with the water contact recreation beneficial use.

Due to the infrequent and short duration of the discharge, this Order does not require a weekly geometric mean limitation and implements the 90th percentile objective as a daily maximum limitation of 320 MPN/100 mL. Expressing the limitation as a daily maximum is more practicable and more stringent than expressing it as a 90th percentile.

- 4.3.4.5. **Total Residual Chlorine.** The limits for total residual chlorine in this Order are derived from the one-hour average criterion from U.S. EPA's *Ambient Water Quality Criteria for Chlorine – 1984* (EPA 440/5-84-030). For freshwaters, the numeric criterion is 0.019 mg/L as a one-hour average.

4.4. Discharge Requirement Considerations

- 4.4.1. **Anti-Backsliding.** This Order complies with the anti-backsliding provisions of CWA sections 402(o) and 40 C.F.R. section 122.44(l), which generally require effluent limitations in a reissued permit to be as stringent as those in the previous order unless an exception applies. The requirements of this Order are at least as stringent as those in the previous order, as amended by Order R2-2023-0023, or otherwise fall under an anti-backsliding exception as explained below.

This Order increases the discharge exercise volume limit from 140,000 gallons to 450,000 gallons at San Lorenzo Creek. This increase is consistent with 40 C.F.R. section 122.44(l)(1), which allows backsliding if the circumstances on which the previous order was based have materially and substantially changed since the time it was issued and would constitute cause for permit modification or revocation and reissuance under 40 C.F.R. section 122.62. Here, the circumstances on which the previous order was based have materially and substantially changed. The Discharger installed a new motor-operated valve at its San Lorenzo Creek wet weather outfall, which will take approximately 30 minutes to open and close to conduct a full evaluation of the outfall equipment at Discharge Point 002, resulting in a minimum discharge volume of 450,000 gallons per discharge. This upgrade, which is part of a larger upgrade to the Discharger's San Leandro Sample Station to renew aging infrastructure and implement more efficient and remote discharge monitoring, would allow the Discharger to have improved control over the discharge flow rate during discharge exercises and wet weather discharge events. This upgrade will better ensure discharges comply with this Order and are protective of the beneficial uses of San Lorenzo Creek by reducing the potential for failed aging infrastructure and monitoring equipment, improving notification efficiency of the discharge monitoring data to Facility operators, and increasing control of the discharge so only the minimum necessary volume of wastewater is discharged. The upgrade meets the causes for modification under 40 C.F.R section 122.62(a)(1) and (2). Specifically, the upgrade is a material and substantial alteration to the facility that occurred since the previous order, as discussed above, and justify the increase in the limit of the discharge exercise volume at San Lorenzo Creek, which is necessary to ensure the proper testing and maintenance of the Facility's wet weather outfall system. The upgrade also constitutes new information that justify the increase in the discharge exercise volume limit.

As discussed in section 5 of the Fact Sheet, this Order removes the receiving water limitations included in the previous order and retains the nuisance provisions contained in the previous order as state only requirements. The removal of these requirements, as a matter of federal law, is consistent with the U.S. Supreme Court's holding in *City and County of San Francisco, California v. Environmental Protection Agency* (2025) 145 S.Ct. 704. However, as discussed in section 5, the Regional Water Board has determined that the requirements in this Order are sufficient to ensure the discharge complies with Clean Water Act section 301(b)(1)(C) (33 U.S.C. § 1311(b)(1)(C)). As a result, the discharge does not authorize violations of water quality standards, and the removal of the receiving water limitations does not authorize the additional discharge of pollutants or authorize the violation of water quality standards. The Order does not, therefore, authorize either backsliding or further degradation of water quality.

- 4.4.2. **Antidegradation.** This Order complies with the antidegradation provisions of 40 C.F.R. section 131.12 and State Water Board Resolution 68-16. It does not authorize lowering water quality as compared to the level of discharge authorized in the previous order as amended by Order R2-2023-0023, which is the baseline by which to measure whether degradation will occur. This Order does not allow for a reduced level of treatment or increased effluent limitations relative to the previous order.

As explained in section Fact Sheet 4.4.1, above, this Order allows for an increased discharge flow rate during discharge exercises. In 1990, the State Water Board adopted Administrative Procedures Update (APU) No. 90-004, which provides guidance for implementing the state and federal antidegradation policies. Consistent with APU No. 90-004, the Discharger's increased discharge volume and associated pollutant loading into San Lorenzo Creek during discharge exercises warrants a simple antidegradation analysis because any incremental reduction in water quality will be minor and temporary and will not result in any long-term deleterious effects. This Order does not affect the total flow from Discharger's treatment plant to Lower San Francisco Bay. However, it does allow the Discharger to shift additional flows up to twice per year 0.6 miles upstream to San Lorenzo Creek, a tidal channel of Lower San Francisco Bay. The discharge exercise volume to San Lorenzo Creek must be increased from 140,000 gallons to 450,000 gallons per discharge event to ensure proper testing and maintenance of the Facility's wet weather outfall, which was upgraded with a new motor-operated valve to improve control over the discharge flow rate to San Lorenzo Creek during exercises and wet weather discharge events. Discharge exercises at San Lorenzo Creek are also no longer limited to the wet season, which will improve protection of Lower San Francisco Bay water quality by allowing the Discharger to test and maintain the operability of its wet weather outfall system, including its ability to monitor for chlorine and adequately dechlorinate its discharge, prior to wet weather events. These changes will not degrade the existing water quality of receiving waters because this Order does not allow for a reduced level of treatment or increased effluent limitations relative to the previous order. Furthermore, San Lorenzo Creek has flow year-round, and its discharge point (Discharge Point 002) is located less than a mile from Lower San Francisco Bay. Discharge exercises will remain limited to no more than twice per year, intermittent, and short in duration. For these reasons, the changes in volume and testing period for discharge exercises to San Lorenzo Creek will not unreasonably affect present and anticipated beneficial uses of San Lorenzo Creek or Lower San Francisco Bay and will result in water quality consistent with State Water Board Resolution No. 68-16's requirement to maintain existing high-quality waters unless lower water quality can be justified.

This Order also removes the generalized receiving water limitations contained in the previous order. As discussed in Fact Sheet section 4.3.3.11, the effluent limitations established in this Order are sufficient to protect San Lorenzo Creek

and Alamo Canal. The removal of the generalized receiving water limitations will not result in an increased volume or concentration of pollutants in the discharge. As explained in Fact Sheet section 4.3.3.11, the technology- and water quality-based effluent limitations established in the Order are sufficient to drive treatment plant performance in a manner comparable to the previous order and to ensure that water quality and beneficial uses are protected. This Order does not, therefore, authorize further degradation of water quality.

- 4.4.3. **Stringency of Requirements for Individual Pollutants.** This Order contains both technology-based and water quality-based effluent limitations for individual pollutants. The technology-based requirements implement minimum, applicable federal technology-based requirements. In addition, this Order contains more stringent effluent limitations as necessary to meet water quality standards. Collectively, this Order's restrictions on individual pollutants are no more stringent than required to implement CWA requirements.

This Order's WQBELs have been derived to implement water quality objectives that protect beneficial uses. The beneficial uses and water quality objectives have been approved pursuant to federal law and are the applicable federal water quality standards. To the extent that WQBELs were derived from the CTR, the CTR is the applicable standard pursuant to 40 C.F.R. section 131.38. The procedures for calculating these WQBELs are based on the CTR, as implemented in accordance with the SIP, which U.S. EPA approved on May 18, 2000. U.S. EPA approved most Basin Plan beneficial uses and water quality objectives prior to May 30, 2000. Beneficial uses and water quality objectives submitted to U.S. EPA prior to May 30, 2000, but not approved by U.S. EPA before that date, are nonetheless "applicable water quality standards for purposes of the CWA" pursuant to 40 C.F.R. section 131.21(c)(1). U.S. EPA approved the remaining beneficial uses and water quality objectives, so they are also applicable water quality standards pursuant to 40 C.F.R. section 131.21(c)(2).

5. RATIONALE FOR RECEIVING WATER LIMITATIONS

This Order removes the receiving water limitations contained in Section V of the previous order that served as backstops for unanticipated circumstances or changes to effluent quality that could affect water quality. The receiving water limitations made the Discharger responsible for the quality of the receiving water without specifying specific requirements (e.g., effluent limitations) or other actions the Discharger must take that apply at or before the discharge point. The Regional Water Board removed the receiving water limitations to be consistent with the U.S. Supreme Court's ruling in *City and County of San Francisco, California v. Environmental Protection Agency* (2025) 145 S.Ct. 704, which held that NPDES permits issued by the U.S. EPA may not include end-result requirements, under the Clean Water Act. End-result requirements are provisions that do not spell out what a Discharger must do or refrain

from doing; rather, they make a Discharger responsible for the quality of the water in the body water into which it discharges pollutants.¹

Section 5 of the Order includes receiving water limitations for aquatic toxicity objectives under State law only. The Toxicity Provisions require the Regional Water Board to include receiving water limitations for the aquatic toxicity objectives when applying the exemption for insignificant discharges. As described in Fact Sheet section 4.3.3.6, the discharges covered by this Order are insignificant discharges as defined in the Toxicity Provisions. The inclusion of the receiving water limitations as State-only requirements is consistent with *City and County of San Francisco v. U.S. EPA* and *Camarillo Sanitary District v. State Water Resources Control Board* as both cases addressed requirements in NPDES permits relying on federal authority.

The requirements in this Order will ensure that the discharge satisfies Clean Water Act section 301(b)(1)(C) (33 U.S.C. § 1311(b)(1)(C)), which requires that the permit include any more stringent limitation, including those necessary to meet water quality standards. See Fact Sheet section 4.3.3.11. If unanticipated circumstances or changes to effluent quality occur during the permit term, the Board may reopen the permit to include any limitations necessary to protect water quality.

6. RATIONALE FOR PROVISIONS

6.1. Standard Provisions

Attachment D contains standard provisions that apply to all NPDES permits in accordance with 40 C.F.R. section 122.41 and additional conditions applicable to specific categories of permits in accordance with 40 C.F.R. section 122.42. The Discharger must comply with these provisions. The conditions set forth in 40 C.F.R. sections 122.41(a)(1) and (b) through (n) apply to all state-issued NPDES permits and must be incorporated into permits either expressly or by reference.

In accordance with 40 C.F.R. section 123.25(a)(12), states may omit or modify conditions to impose more stringent requirements. Attachment G contains standard provisions that supplement the provisions in Attachment D. This Order omits the federal conditions that address enforcement authority specified in 40 C.F.R. sections 122.41(j)(5) and (k)(2) because the State's enforcement authority under the Water Code is more stringent. In lieu of these conditions, this Order incorporates Water Code section 13387(e) by reference.

¹ While the Regional Water Board removed generalized receiving water limitations in accordance with the U.S. Supreme Court's decision interpreting the Clean Water Act's NPDES requirements, the Regional Water Board may decide in the future to include similar requirements as a matter of state authority.

6.2. Monitoring and Reporting Provisions

CWA section 308 and 40 C.F.R. sections 122.41(h), 122.41(j)-(l), 122.44(i), and 122.48 require that NPDES permits specify monitoring and reporting requirements. Water Code section 13383 also authorizes the Regional Water Board to establish monitoring, inspection, entry, reporting, and recordkeeping requirements. The MRP establishes monitoring, reporting, and recordkeeping requirements that implement federal and State requirements. For more information, see Fact Sheet section 7.

6.3. Special Provisions

6.3.1. Reopener Provisions

These provisions are based on 40 C.F.R. sections 122.62 and 122.63 and allow modification of this Order and its effluent limitations as necessary in response to updated water quality objectives, regulations, or other new and relevant information that may become available in the future, and other circumstances as allowed by law.

6.3.2. Effluent Characterization Study and Report

This Order does not include WQBELs for pollutants that do not demonstrate reasonable potential, but this provision requires the Discharger to evaluate monitoring data to verify that the reasonable potential analysis conclusions of this Order remain valid. This requirement is authorized pursuant to 40 C.F.R. section 122.41(h) and Water Code section 13383 and is necessary to inform the next permit reissuance and to ensure that the Discharger takes timely steps in response to any unanticipated change in effluent quality during the term of this Order.

6.3.3. Pollutant Minimization Program

This provision is based on Basin Plan section 4.13.2 and SIP section 2.4.5.

6.3.4. Other Special Provisions

6.3.4.1. **Wet Weather Discharge Notification.** This provision is necessary to inform the Regional Water Board of authorized discharges and the extent of those discharges.

6.3.4.2. **Wet Weather Discharge Annual Report.** This provision is necessary to evaluate compliance with the discharge prohibitions in section 3 of this Order and the monitoring requirements in Attachment E sections 3 and 4.

6.3.4.3. **Wet Weather Facilities Management Plan.** This provision is necessary to ensure that the Discharger evaluates and manages its Facility to minimize

future discharges. Many requirements of this Order are based on the continued infrequency of discharges to San Lorenzo Creek and Alamo Canal.

- 6.3.4.4. **Chlorine Process Control Plan.** This provision consistent with Order R2-2023-0023 and is necessary to ensure that using a water quality-based effluent limitation for chlorine is consistent with antidegradation policies. The provision requires the Discharger to implement a Chlorine Process Control Plan to target a chlorine residual of 0.0 mg/L at the discharge point. This will ensure that chlorine will typically not be present in discharge and, if chlorine is detected, the duration of such discharges will be relatively short.

6.4. Provisions That Implement State Law Only

Attachment G Provision I.I.1. of the previous order stated, “Neither the treatment nor the discharge of pollutants shall create pollution, contamination, or nuisance as defined by California Water Code section 13050.” Consistent with the holding in *City and County of San Francisco, California v. Environmental Protection Agency* (2025) 145 S.Ct. 704 (discussed in Fact Sheet section 5), this Order does not retain this provision as a federal requirement. However, this Order does retain a modified version of the provision in Attachment G Provision 1.9.1 as a matter of state law: “the treatment of pollutants shall not create nuisance as defined by California Water Code section 13050.” This requirement does not address the discharge of pollutants or pollution or contamination because this Order includes technology-based and water quality-based effluent limitations sufficient to prevent nuisance or contamination in receiving water associated with the discharge.

The Regional Water Board has maintained this provision as a state law requirement to implement Water Code section 13263, which identifies the need to prevent nuisance as a factor to consider when issuing waste discharge requirements. The U.S. Supreme Court’s decision in *City and County of San Francisco v. U.S. EPA* did not interpret the Water Code. Furthermore, there is no provision of the Water Code analogous to the NPDES permit shield that was a part of the basis of the U.S. Supreme Court’s decision. Likewise, the Porter-Cologne Water Quality Control Act has consistently recognized the ability of the Water Boards to regulate to prevent nuisance, and the Porter-Cologne Water Quality Control Act does not share the legislative history of the federal Clean Water Act. This Order, therefore, maintains the requirements identified above to continue protections as a matter of state law.

Section V of the previous order contained receiving water limitations related to discharges containing toxicity. Specifically, section 5.1.9 prohibited the discharge of “Toxic or other deleterious substances in concentrations or quantities that cause deleterious effects on...aquatic biota...either at levels created in the receiving waters or as a result of biological concentration.” Section 5.3 stated, “The discharge shall not cause a violation of any water quality standard for receiving

waters adopted by the Regional Water Board or State Water Resources Control Board (State Water Board) as required by the CWA and regulations adopted thereunder...,” which now includes the objectives in the Toxicity Provisions. Consistent with *City and County of San Francisco, California v. Environmental Protection Agency* and *Camarillo Sanitary District v. State Water Resources Control Board*, this Order does not retain these receiving water limitations as federal requirements. This Order does, however, include receiving water limitations for aquatic toxicity in section 5 as a matter of state law only.

The Regional Water Board included the receiving water limitations as state-only requirements to implement the Toxicity Provisions. The Toxicity Provisions require the Regional Water Board to include receiving water limitations for aquatic toxicity objectives when applying the exemption for insignificant discharges. As described in Fact Sheet section 4.3.3.6, the discharges covered by this Order are insignificant discharges as defined in the Toxicity Provisions.

As required by Water Code section 13263, the Regional Water Board has considered the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance, and the factors listed in Water Code section 13241 in establishing these state law requirements. The Water Code section 13241 factors are considered below.

As required by Water Code section 13263, the Regional Water Board has considered the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance, and the factors listed in Water Code section 13241 in establishing these state law requirements. The Water Code section 13241 factors are considered below.

- 6.4.1. **Past, present, and probable future beneficial uses of water.** Basin Plan Chapter 2 identifies designated beneficial uses for water bodies in the San Francisco Bay Region. Beneficial uses of water relevant to this Order are also identified above in Fact Sheet Table F-4. The Regional Water Board has taken beneficial uses into account in establishing the requirements of this Order. The receiving water limitations and prohibition against nuisance will not adversely affect present and future beneficial uses of water.
- 6.4.2. **Environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto.** The environmental characteristics of San Lorenzo Creek and Alamo Canal are described in Basin Plan Table 2-1 and the Discharger’s Report of Waste Discharge. The receiving water limitations and prohibition against nuisance will not adversely affect the environmental characteristics of the hydrographic unit.
- 6.4.3. **Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area.** By

complying with the CWA-mandated requirements established in this Order, the Discharger will ensure control over factors that could affect water quality. The receiving water limitations in section 5 of this Order and the requirement to prevent nuisance will ensure that the treatment processes do not result in environmental conditions that could adversely affect the surrounding community.

- 6.4.4. **Economic considerations.** The Discharger has reliably operated its treatment plant over several permit terms without creating nuisance conditions or adversely impacting the beneficial uses in San Lorenzo Creek and Alamo Canal. Therefore, these requirements are unlikely to impose additional economic costs on the Discharger. In the unlikely event that the Discharger incurs additional costs to prevent nuisance or adverse impacts to the beneficial uses of San Lorenzo Creek or Alamo Canal, those costs would be justified and necessary to properly operate and maintain its treatment plant and protect public health and the environment. If a nuisance were to occur, it would have a negative economic impact on tourism, recreation, and affected residents in the area.
- 6.4.5. **The need for developing housing within the region.** Neither the receiving water limitations in Section 5 of this Order nor the requirement to prevent nuisance will adversely affect the development of housing within the region.
- 6.4.6. **The need to develop and use recycled water.** Neither the receiving water limitations in Section 5 of this Order nor the requirement to prevent nuisance will impact on the development and use of recycled water.

7. RATIONALE FOR MONITORING AND REPORTING REQUIREMENTS

The following provides the rationale for the monitoring and reporting requirements in the MRP.

7.1. Monitoring Requirements Rationale

- 7.1.1. **Effluent Monitoring.** Effluent monitoring at Monitoring Location EFF-001 is necessary to conduct future reasonable potential analyses. Effluent monitoring at Monitoring Locations EFF-002 and EFF-003 is necessary to evaluate compliance with this Order's effluent limitations and Discharge Prohibitions 3.2 (discharges to San Lorenzo Creek during peak wet weather), 3.3 (discharges to Alamo Canal during peak wet weather), and 3.5 (discharges during discharge exercises). It is also necessary to conduct future reasonable potential analyses. The allowance for determining false positives for chlorine residual when using continuous devices is based on the fact that continuous instruments occasionally have anomalous spikes, and it is chemically improbable to have free chlorine present in the presence of the dechlorinating agent.

7.1.2. **Receiving Water Monitoring.** Monitoring at Monitoring Locations RSW-002D and 003D (downstream monitoring) is necessary to ascertain the effect of the discharge on San Lorenzo Creek and Alamo Canal, conduct future reasonable potential analyses, and evaluate compliance with this Order's receiving water limitations. Downstream ammonia, pH, temperature, and salinity monitoring is also necessary to estimate un-ionized ammonia concentrations from total ammonia measurements. Monitoring at Monitoring Locations RSW-002U and 003U (upstream monitoring) is necessary to ascertain background conditions to conduct future reasonable potential analyses. Upstream pH and hardness monitoring are also necessary to calculate applicable water quality objectives.

7.1.3. **Other Monitoring Requirements.** Pursuant to CWA section 308, U.S. EPA requires some dischargers to participate in a Discharge Monitoring Report-Quality Assurance (DMR-QA) Study Program that evaluates the analytical abilities of laboratories that perform or support NPDES permit-required monitoring. The program applies to discharger laboratories and contract laboratories, and evaluates each laboratory's ability to analyze wastewater samples to produce quality data that ensure the integrity of the NPDES program. There are two options to comply: (1) the Discharger may obtain and analyze DMR-QA samples, or (2) pursuant to a waiver U.S. EPA issued to the State Water Board, the Discharger may submit results from the most recent Water Pollution Performance Evaluation Study. MRP section 1.4 requires the Discharger to ensure that the results of the DMR-QA Study or most recent Water Pollution Performance Evaluation Study are submitted to the State Water Board, which forwards the results to U.S. EPA.

7.2. **Monitoring Requirements Summary.** The table below summarizes routine monitoring requirements. This table is for informational purposes only. The actual requirements are specified in the MRP and elsewhere in this Order.

Table F-9. Monitoring Requirements Summary

Parameter	Effluent EFF-001 ^[1]	Effluent EFF-002 ^[1]	Effluent EFF-003 ^[1]	Receiving Water RSW-002U and RSW-003U ^[1]	Receiving Water RSW-002D and RSW-003D ^[1]
CBOD ₅	1/Discharge	1/Discharge	1/Discharge	-	-
TSS	1/Discharge	1/Discharge	1/Discharge	-	-
pH ^[2]	1/Discharge	1/Discharge	1/Discharge	Once	Once
Lead, Total	-	1/Discharge	1/Discharge	-	-
Temperature ^[2]	1/Year	-	-	Once	Once
Salinity ^[2]	-	-	-	Twice	Once
Ammonia, Total ^[2]	1/Year	-	-	-	Once
Hardness	-	-	-	Twice	-
Dissolved Oxygen	-	-	-	Once	Once
<i>Escherichia</i> Coliform Bacteria	-	1/Discharge	1/Discharge	-	-

Parameter	Effluent EFF-001 ^[1]	Effluent EFF-002 ^[1]	Effluent EFF-003 ^[1]	Receiving Water RSW-002U and RSW-003U ^[1]	Receiving Water RSW-002D and RSW-003D ^[1]
Chlorine, Total Residual	-	Once every two hours during discharge ^[3]	Once every two hours during discharge ^[3]	-	-
Discharge Duration	-	1/Discharge	1/Discharge	-	-
Discharge Volume	-	1/Discharge	1/Discharge	-	-
Priority Pollutants	Once	-	-	Once	-
Standard Observations ^[4]	-	-	-	-	1/Discharge

Footnotes:

^[1] The MRP defines these monitoring locations and sampling frequencies.

^[2] pH, temperature, salinity, and ammonia sampling shall occur on the same day to allow for the calculation of the un-ionized ammonia fraction.

^[3] During discharge exercises, the Discharger may monitor for total residual chlorine once per discharge.

^[4] Standard observations are set forth in Attachment G section 3.2.

8. PUBLIC PARTICIPATION

The Regional Water Board considered the issuance of WDRs that will serve as an NPDES permit for the Facility. As a step in the WDR adoption process, Regional Water Board staff developed tentative WDRs and encouraged public participation in the WDR adoption process.

8.1. Notification of Interested Parties. The Regional Water Board notified the Discharger and interested agencies and persons of its intent to prescribe WDRs for the discharge and provided an opportunity to submit written comments and recommendations. The public had access to the agenda and any changes in dates and locations through the [Regional Water Board's website](https://waterboards.ca.gov/sanfranciscobay) (waterboards.ca.gov/sanfranciscobay).

8.2. Written Comments. Interested persons were invited to submit written comments concerning the tentative WDRs as explained through the notification process. Comments were to be submitted either in person, by email, or by mail to the Executive Office at the Regional Water Board at 1515 Clay Street, Suite 1400, Oakland, California 94612, to the attention of Natlie Lee.

Written comments were due at the Regional Water Board office by 5:00 p.m. on July 6, 2026.

8.3. Public Hearing. The Regional Water Board held a public hearing on the tentative Order during its regular meeting at the following date and time:

Date: August 12, 2026
Time: 9:00 a.m.

Contact: Natlie Lee, (510) 622-2325
Mail to: Natlie.Lee@waterboards.ca.gov

Interested persons were provided notice of the hearing and information on how to participate. At the public hearing, the Regional Water Board heard testimony pertinent to the discharge and Order.

Dates and venues can change. The [Regional Water Board's website](https://www.waterboards.ca.gov/sanfranciscobay) is ([waterboards.ca.gov/sanfranciscobay](https://www.waterboards.ca.gov/sanfranciscobay)), where one can access the current agenda for changes.

- 8.4. Reconsideration of Waste Discharge Requirements.** Any person aggrieved by this Regional Water Board action may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050. The State Water Board must receive the petition at the following address within 30 calendar days of the date of Regional Water Board action:

State Water Resources Control Board
Office of Chief Counsel
P.O. Box 100, 1001 I Street
Sacramento, CA 95812-0100

A petition may also be filed by email at waterqualitypetitions@waterboards.ca.gov.

For instructions on how to file a water quality petition for review, see the [Water Board's petition instructions](https://www.waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.shtml) ([waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.shtml](https://www.waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.shtml)).

- 8.5. Information and Copying.** Supporting documents and comments received are on file. To review these documents, please contact Melinda Wong, the Regional Water Board's custodian of records, by calling (510) 622-2300 or emailing Melinda.Wong@waterboards.ca.gov. Document copying may be arranged.
- 8.6. Register of Interested Persons.** Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact the Regional Water Board, reference the Facility, and provide a name, address, and phone number.
- 8.7. Additional Information.** Requests for additional information or questions regarding this Order should be directed to Natlie Lee, (510) 622-2325, Natlie.Lee@waterboards.ca.gov.

ATTACHMENT G – REGIONAL STANDARD PROVISIONS, AND MONITORING AND REPORTING REQUIREMENTS (SUPPLEMENT TO ATTACHMENT D)

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**ATTACHMENT G – REGIONAL STANDARD PROVISIONS,
AND MONITORING AND REPORTING REQUIREMENTS
(SUPPLEMENT TO ATTACHMENT D)**

APPLICABILITY

This document supplements the requirements of Federal Standard Provisions (Attachment D). For clarity, these provisions are arranged using the same headings as those used in Attachment D.

1. STANDARD PROVISIONS – PERMIT COMPLIANCE

1.1. Duty to Comply – Not Supplemented

1.2. Need to Halt or Reduce Activity Not a Defense – Not Supplemented

1.3. Duty to Mitigate – Supplement to Attachment D, Provision 1.3.

1.3.1. Contingency Plan. The Discharger shall maintain a Contingency Plan as prudent in accordance with current facility emergency planning. The Contingency Plan shall describe procedures to ensure that existing facilities remain in, or are rapidly returned to, operation in the event of a process failure or emergency incident, such as employee strike, strike by suppliers of chemicals or maintenance services, power outage, vandalism, earthquake, or fire. The Discharger may combine the Contingency Plan and Spill Prevention Plan (see Provision 1.3.2, below) into one document. In accordance with Regional Water Board Resolution No. 74-10, discharge in violation of the permit where the Discharger has failed to develop and implement a Contingency Plan as described below may be the basis for considering the discharge a willful and negligent violation of the permit pursuant to California Water Code section 13387. The Contingency Plan shall, at a minimum, provide for the following:

- 1.3.1.1. Sufficient personnel for continued facility operation and maintenance during employee strikes or strikes against contractors providing services;
- 1.3.1.2. Maintenance of adequate chemicals or other supplies, and spare parts necessary for continued facility operations;
- 1.3.1.3. Emergency standby power;
- 1.3.1.4. Protection against vandalism;
- 1.3.1.5. Expeditious action to repair failures of, or damage to, equipment, including any sewer lines;

- 1.3.1.6. Reporting of spills and discharges of untreated or inadequately treated wastes, including measures taken to clean up the effects of such discharges; and
- 1.3.1.7. Maintenance, replacement, and surveillance of physical condition of equipment and facilities, including any sewer lines.
- 1.3.2. **Spill Prevention Plan.** The Discharger shall maintain a Spill Prevention Plan to prevent accidental discharges and to minimize the effects of any such discharges. The Spill Prevention Plan shall do the following:
 - 1.3.2.1. Identify the possible sources of accidental discharge, untreated or partially-treated waste bypass, and polluted drainage;
 - 1.3.2.2. State when current facilities and procedures became operational and evaluate their effectiveness; and
 - 1.3.2.3. Predict the effectiveness of any proposed facilities and procedures and provide an implementation schedule with interim and final dates when the proposed facilities and procedures will be constructed, implemented, or operational.

1.4. Proper Operation and Maintenance – Supplement to Attachment D, Provision 1.4

- 1.4.1. **Operation and Maintenance Manual.** The Discharger shall maintain an Operation and Maintenance Manual to provide the plant and regulatory personnel with a source of information describing all equipment, recommended operational strategies, process control monitoring, and maintenance activities. To remain a useful and relevant document, the Operation and Maintenance Manual shall be kept updated to reflect significant changes in treatment facility equipment and operational practices. The Operation and Maintenance Manual shall be maintained in usable condition and be available for reference and use by all relevant personnel and Regional Water Board staff.
- 1.4.2. **Wastewater Facilities Status Report.** The Discharger shall maintain a Wastewater Facilities Status Report and regularly review, revise, or update it, as necessary. This report shall document how the Discharger operates and maintains its wastewater collection, treatment, and disposal facilities to ensure that all facilities are adequately staffed, supervised, financed, operated, maintained, repaired, and upgraded as necessary to provide adequate and reliable transport, treatment, and disposal of all wastewater from both existing and planned future wastewater sources under the Discharger's service responsibilities.
- 1.4.3. **Proper Supervision and Operation of Publicly Owned Treatment Works (POTWs).** POTWs shall be supervised and operated by persons possessing

certificates of appropriate grade pursuant to Title 23, section 3680, of the California Code of Regulations.

1.5. Property Rights – Not Supplemented

1.6. Inspection and Entry – Not Supplemented

1.7. Bypass – Not Supplemented

1.8. Upset – Not Supplemented

1.9. Other – Addition to Attachment D

- 1.9.1. The treatment of pollutants shall not create nuisance as defined by California Water Code section 13050.
- 1.9.2. Collection, treatment, storage, and disposal systems shall be operated in a manner that precludes public contact with wastewater. If public contact with wastewater could reasonably occur on public property, warning signs shall be posted.
- 1.9.3. If the Discharger submits a timely and complete Report of Waste Discharge for permit reissuance, this permit shall continue in force and effect until the permit is reissued or the Regional Water Board rescinds the permit.

2. STANDARD PROVISIONS – PERMIT ACTION – NOT SUPPLEMENTED

3. STANDARD PROVISIONS – MONITORING

3.1. Sampling and Analyses – Supplement to Attachment D, Provisions 3.1 and 3.2

- 3.1.1. **Certified Laboratories.** Water and waste analyses shall be performed by a laboratory certified for these analyses in accordance with California Water Code section 13176.
- 3.1.2. **Minimum Levels.** For the 126 priority pollutants, the Discharger should use the analytical methods listed in Table B unless the Monitoring and Reporting Program (MRP, Attachment E) requires a particular method or minimum level (ML). All monitoring instruments and equipment shall be properly calibrated and maintained to ensure accuracy of measurements.
- 3.1.3. **Monitoring Frequency.** The MRP specifies the minimum sampling and analysis schedule.
 - 3.1.3.1. **Sample Collection Timing**
 - 3.1.3.1.1. The Discharger shall collect influent samples on varying days selected at random and shall not include any plant recirculation or other sidestream

wastes, unless otherwise stipulated in the MRP. The Executive Officer may approve an alternative influent sampling plan if it is representative of plant influent and complies with all other permit requirements.

- 3.1.3.1.2. The Discharger shall collect effluent samples on days coincident with influent sampling, unless otherwise stipulated by the MRP. If influent sampling is not required, the Discharger shall collect effluent samples on varying days selected at random, unless otherwise stipulated in the MRP. The Executive Officer may approve an alternative effluent sampling plan if it is representative of plant discharge and in compliance with all other permit requirements.
- 3.1.3.1.3. The Discharger shall collect effluent grab samples during periods of daytime maximum peak flows (or peak flows through secondary treatment units for facilities that recycle effluent).
- 3.1.3.1.4. Effluent sampling for conventional pollutants shall occur on at least one day of any multiple-day bioassay the MRP requires. During the course of the bioassay, on at least one day, the Discharger shall collect and retain samples of the discharge. In the event that a bioassay result does not comply with effluent limitations, the Discharger shall analyze the retained samples for pollutants that could be toxic to aquatic life and for which it has effluent limitations.
- 3.1.3.1.4.1. The Discharger shall perform bioassays on final effluent samples; when chlorine is used for disinfection, bioassays shall be performed on effluent after chlorination and dechlorination; and
- 3.1.3.1.4.2. The Discharger shall analyze for total ammonia nitrogen and calculate the amount of un ionized ammonia whenever test results fail to meet effluent limitations.

3.1.3.2. **Conditions Triggering Accelerated Monitoring**

- 3.1.3.2.1. **Average Monthly Effluent Limitation Exceedance.** If the results from two consecutive samples of a constituent monitored in a particular month exceed the average monthly effluent limitation for any parameter (or if the required sampling frequency is once per month or less and the monthly sample exceeds the average monthly effluent limitation), the Discharger shall, within 24 hours after the results are received, increase its sampling frequency to daily until the results from the additional sampling show that the parameter complies with the average monthly effluent limitation.
- 3.1.3.2.2. **Maximum Daily Effluent Limitation Exceedance.** If a sample result exceeds a maximum daily effluent limitation, the Discharger shall, within 24 hours after the result is received, increase its sampling frequency to

daily until the results from two samples collected on consecutive days show compliance with the maximum daily effluent limitation.

- 3.1.3.2.3. **Acute Toxicity.** If final or intermediate results of an acute bioassay indicate a violation or threatened violation (e.g., the percentage of surviving test organisms of any single acute bioassay is less than 70 percent), the Discharger shall initiate a new test as soon as practical or as described in applicable State Water Board plan provisions that become effective after adoption of these Regional Standard Provisions. The Discharger shall investigate the cause of the mortalities and report its findings in the next self-monitoring report.
- 3.1.3.2.4. **Chlorine.** The Discharger shall calibrate chlorine residual analyzers against grab samples as frequently as necessary to maintain accurate control and reliable operation. If an effluent violation is detected, the Discharger shall collect grab samples at least every 30 minutes until compliance with the limitation is achieved, unless the Discharger monitors chlorine residual continuously. In such cases, the Discharger shall continue to conduct continuous monitoring.
- 3.1.3.2.5. **Bypass.** Except as indicated below, if a Discharger bypasses any portion of its treatment facility, it shall monitor flows and collect samples at affected discharge points and analyze samples for all constituents with effluent limitations on a daily basis for the duration of the bypass. The Discharger need not accelerate chronic toxicity monitoring. The Discharger also need not collect and analyze samples for mercury, dioxin-TEQ, and PCBs after the first day of the bypass. The Discharger may satisfy the accelerated acute toxicity monitoring requirement by conducting a flow-through test or static renewal test that captures the duration of the bypass (regardless of the method specified in the MRP). If bypassing disinfection units only, the Discharger shall only monitor bacteria indicators daily.
- 3.1.3.2.5.1. **Bypass for Essential Maintenance.** If a Discharger bypasses a treatment unit for essential maintenance pursuant to Attachment D section 1.7.2, the Executive Officer may reduce the accelerated monitoring requirements above if the Discharger (i) monitors effluent at affected discharge points on the first day of the bypass for all constituents with effluent limitations, except chronic toxicity; and (ii) identifies and implements measures to ensure that the bypass will continue to comply with effluent limitations.
- 3.1.3.2.5.2. **Approved Wet Weather Bypasses.** If a Discharger bypasses a treatment unit or permitted outfall during wet weather with Executive Officer approval pursuant to Attachment D section 1.7.4, the Discharger shall monitor flows and collect and retain samples for affected

discharge points on a daily basis for the duration of the bypass. The Discharger shall analyze daily for TSS using 24 hour composites (or more frequent increments) and for bacteria indicators with effluent limitations using grab samples. If TSS exceeds 45 mg/L in any composite sample, the Discharger shall also analyze daily the retained samples for all other constituents with effluent limitations, except oil and grease, mercury, PCBs, dioxin-TEQ, and acute and chronic toxicity. Additionally, at least once each year, the Discharger shall analyze the retained samples for one approved bypass for all other constituents with effluent limitations, except oil and grease, mercury, PCBs, dioxin-TEQ, and acute and chronic toxicity. This monitoring shall be in addition to the minimum monitoring specified in the MRP.

3.2. Standard Observations – Addition to Attachment D

3.2.1. **Receiving Water Observations.** The following requirements only apply when the MRP requires standard observations of receiving waters. Standard observations shall include the following:

- 3.2.1.1. **Floating and Suspended Materials (e.g., oil, grease, algae, and other macroscopic particulate matter)** — presence or absence, source, and size of affected area.
- 3.2.1.2. **Discoloration and Turbidity** — color, source, and size of affected area.
- 3.2.1.3. **Odor** — presence or absence, characterization, source, and distance of travel.
- 3.2.1.4. **Beneficial Water Use** — estimated number of water-associated waterfowl or wildlife, fisherpeople, and other recreational activities.
- 3.2.1.5. **Hydrographic Condition** — time and height of high and low tides (corrected to nearest National Oceanic and Atmospheric Administration location for the sampling date and time).
- 3.2.1.6. **Weather Conditions** — wind direction, air temperature, and total precipitation during five days prior to observation.

3.2.2. **Wastewater Effluent Observations.** The following requirements only apply when the MRP requires standard observations of wastewater effluent. Standard observations shall include the following:

- 3.2.2.1. **Floating and Suspended Material of Wastewater Origin** (e.g., oil, grease, algae, and other macroscopic particulate matter) — presence or absence.
- 3.2.2.2. **Odor** — presence or absence, characterization, source, distance of travel, and wind direction.

3.2.3. **Beach and Shoreline Observations.** The following requirements only apply when the MRP requires standard observations of beaches or shorelines. Standard observations shall include the following:

3.2.3.1. **Material of Wastewater Origin** — presence or absence, description of material, estimated size of affected area, and source.

3.2.3.2. **Beneficial Use** — estimate of number of people participating in recreational water contact, non-water contact, and fishing activities.

3.2.4. **Waste Treatment and/or Disposal Facility Periphery Observations.** The following requirements only apply when the MRP requires standard observations of the periphery of waste treatment or disposal facilities. Standard observations shall include the following:

3.2.4.1. **Odor** — presence or absence, characterization, source, and distance of travel.

3.2.4.2. **Weather Conditions** — wind direction and estimated velocity.

4. STANDARD PROVISIONS – RECORDS

4.1. Records to be Maintained – Supplement to Attachment D, Provision 4.1

The Discharger shall maintain records in a manner and at a location (e.g., the wastewater treatment plant or the Discharger's offices) such that the records are accessible to Regional Water Board staff. The minimum retention period specified in Attachment D, Provision IV, shall be extended during the course of any unresolved litigation regarding permit-related discharges, or when requested by Regional Water Board or U.S. EPA, Region IX, staff.

A copy of the permit shall be maintained at the discharge facility and be available at all times to operating personnel.

4.2. Records of Monitoring – Supplement to Attachment D, Provision 4.2

Monitoring records shall include the following:

4.2.1. **Analytical Information.** Records shall include analytical method detection limits, minimum levels, reporting levels, and related quantification parameters.

4.2.2. **Disinfection Process.** For the disinfection process, records shall include the following:

4.2.2.1. For bacteriological analyses:

4.2.2.1.1. Wastewater flow rate at the time of sample collection; and

- 4.2.2.1.2. Required statistical parameters for cumulative bacterial values (e.g., moving median or geometric mean for the number of samples or sampling period identified in the MRP).
- 4.2.2.2. For the chlorination process (when chlorine is used for disinfection), at least daily average values for the following:
 - 4.2.2.2.1. Chlorine residual of treated wastewater as it enters the chlorine contact basin (mg/L);
 - 4.2.2.2.2. Chlorine dosage (kg/day); and
 - 4.2.2.2.3. Dechlorination chemical dosage (kg/day).
- 4.2.3. **Wastewater Treatment Process Solids.** For each treatment unit process that involves solids removal from the wastewater stream, records shall include the following:
 - 4.2.3.1. Total volume or mass of solids removed from each collection unit (e.g., grit, skimmings, undigested biosolids, or combination) for each calendar month or other time period as appropriate, but not to exceed annually; and
 - 4.2.3.2. Final disposition of such solids (e.g., landfill, other subsequent treatment unit).
- 4.2.4. **Treatment Process Bypasses.** For all treatment process bypasses, including wet weather blending, records shall include the following:
 - 4.2.4.1. Chronological log of treatment process bypasses;
 - 4.2.4.2. Identification of treatment processes bypassed;
 - 4.2.4.3. Beginning and ending dates and times of bypasses;
 - 4.2.4.4. Bypass durations;
 - 4.2.4.5. Estimated bypass volumes; and
 - 4.2.4.6. Description of, or reference to other reports describing, the bypasses, their cause, the corrective actions taken (except for wet weather blending explicitly approved within the permit and in compliance with any related permit conditions), and any additional monitoring conducted.
- 4.2.5. **Treatment Plant Spills.** The Discharger shall retain a chronological log of spills at the treatment plant, including the headworks and all units and appurtenances downstream, and records supporting the information provided in accordance with Provision 5.5.2, below.

4.3. Claims of Confidentiality – Not Supplemented

5. STANDARD PROVISIONS – REPORTING

5.1. Duty to Provide Information – Not Supplemented

5.2. Signatory and Certification Requirements – Not Supplemented

5.3. Monitoring Reports – Supplement to Attachment D, Provision 5.3

5.3.1. Self-Monitoring Reports. For each reporting period established in the MRP, the Discharger shall submit a self-monitoring report to the Regional Water Board in accordance with the requirements listed in the MRP and below:

5.3.1.1. Transmittal Letter. Each self-monitoring report shall be submitted with a transmittal letter that includes the following:

- 5.3.1.1.1. Identification of all violations of effluent limitations or other waste discharge requirements found during the reporting period;
- 5.3.1.1.2. Details regarding the violations, such as parameters, magnitude, test results, frequency, and dates;
- 5.3.1.1.3. Causes of the violations;
- 5.3.1.1.4. Corrective actions taken or planned to resolve violations and prevent recurrences, and dates or time schedules for implementation (the Discharger may refer to previously submitted reports that address the corrective actions);
- 5.3.1.1.5. Explanation for any data invalidation. Data should not be submitted in a self-monitoring report if it does not meet quality assurance/quality control standards. However, if the Discharger wishes to invalidate a measurement after submitting it in a self-monitoring report, the Discharger shall identify the measurement suspected to be invalid and state the Discharger's intent to submit, within 60 days, a formal request to invalidate the measurement. The formal request shall include the original measurement in question, the reason for invalidating the measurement, all relevant documentation that supports invalidation (e.g., laboratory sheet, log entry, test results), and a discussion of the corrective actions taken or planned (with a time schedule for completion) to prevent recurrence of the sampling or measurement problem;
- 5.3.1.1.6. Description of blending, if any. If the Discharger blends, it shall describe the duration of blending events and certify whether the blending complied with all conditions for blending;

- 5.3.1.1.7. Description of other bypasses, if any. If the Discharger bypasses any treatment units (other than blending), it shall describe the duration of the bypasses and effluent quality during those times; and
- 5.3.1.1.8. Signature. The transmittal letter shall be signed in accordance with Attachment D, Provision 5.2.
- 5.3.1.2. **Compliance Evaluation Summary.** Each self-monitoring report shall include a compliance evaluation summary that addresses each parameter for which the permit specifies effluent limitations, the number of samples taken during the monitoring period, and the number of samples that exceed the effluent limitations.
- 5.3.1.3. **More Frequent Monitoring.** If the Discharger monitors any pollutant more frequently than required by the MRP, the Discharger shall include the results of such monitoring in the calculation and reporting of the data submitted in the self-monitoring report.
- 5.3.1.4. **Analysis Results**
- 5.3.1.4.1. **Tabulation.** Each self-monitoring report shall include tabulations of all required analyses and observations, including parameters, dates, times, sample stations, types of samples, test results, method detection limits, method minimum levels, and method reporting levels (if applicable), signed by the laboratory director or other responsible official.
- 5.3.1.4.2. **Multiple Samples.** Unless the MRP specifies otherwise, when determining compliance with effluent limitations (other than instantaneous effluent limitations) and more than one sample result is available, the Discharger shall compute the arithmetic mean. If the data set contains one or more results that are "Detected, but Not Quantified (DNQ) or "Not Detected" (ND), the Discharger shall instead compute the median in accordance with the following procedure:
- 5.3.1.4.2.1. The data set shall be ranked from low to high, reported ND determinations lowest, DNQ determinations next, followed by quantified values (if any). The order of the individual ND or DNQ determinations is unimportant.
- 5.3.1.4.2.2. The median of the data set shall be determined. If the data set has an odd number of data points, the median is the middle value. If the data set has an even number of data points, the median is the average of the two values around the middle, unless one or both of these values is ND or DNQ, in which case the median shall be the lower of the two results (where DNQ is lower than a quantified value and ND is lower than DNQ).

5.3.1.4.3. **Duplicate Samples.** The Discharger shall report the average of duplicate sample analyses when reporting for a single sample result (or the median if one or more of the duplicates is DNQ or ND [see Provision 5.3.1.4.2, above]). For bacteria indicators, the Discharger shall report the geometric mean of the duplicate analyses.

5.3.1.4.4. **Dioxin-TEQ.** The Discharger shall report for each dioxin and furan congener the analytical results of effluent monitoring, including the reporting level, the method detection limit, and the measured concentration. The Discharger shall report all measured values of individual congeners, including data qualifiers. When calculating dioxin-TEQ, the Discharger shall set congener concentrations below the minimum levels (MLs) to zero. The Discharger shall calculate and report dioxin-TEQ using the following formula, where the MLs, toxicity equivalency factors (TEFs), and bioaccumulation equivalency factors (BEFs) are as provided in Table A:

$$\text{Dioxin-TEQ} = \sum (C_x \times \text{TEF}_x \times \text{BEF}_x)$$

where: C_x = measured or estimated concentration of congener x

TEF_x = toxicity equivalency factor for congener x

BEF_x = bioaccumulation equivalency factor for congener x

Table A
Minimum Levels, Toxicity Equivalency Factors,
and Bioaccumulation Equivalency Factors

Dioxin or Furan Congener	Minimum Level (pg/L)	2005 Toxicity Equivalency Factor (TEF)	Bioaccumulation Equivalency Factor (BEF)
2,3,7,8-TCDD	10	1.0	1.0
1,2,3,7,8-PeCDD	50	1.0	0.9
1,2,3,4,7,8-HxCDD	50	0.1	0.3
1,2,3,6,7,8-HxCDD	50	0.1	0.1
1,2,3,7,8,9-HxCDD	50	0.1	0.1
1,2,3,4,6,7,8-HpCDD	50	0.01	0.05
OCDD	100	0.0003	0.01
2,3,7,8-TCDF	10	0.1	0.8
1,2,3,7,8-PeCDF	50	0.03	0.2
2,3,4,7,8-PeCDF	50	0.3	1.6
1,2,3,4,7,8-HxCDF	50	0.1	0.08
1,2,3,6,7,8-HxCDF	50	0.1	0.2
1,2,3,7,8,9-HxCDF	50	0.1	0.6
2,3,4,6,7,8-HxCDF	50	0.1	0.7
1,2,3,4,6,7,8-HpCDF	50	0.01	0.01
1,2,3,4,7,8,9-HpCDF	50	0.01	0.4
OCDF	100	0.0003	0.02

- 5.3.1.5. **Results Not Yet Available.** The Discharger shall make all reasonable efforts to obtain analytical data for required parameter sampling in a timely manner. Certain analyses may require additional time to complete analytical processes and report results. In these cases, the Discharger shall describe the circumstances in the self-monitoring report and include the data for these parameters and relevant discussions of any violations in the next self-monitoring report due after the results are available.
- 5.3.1.6. **Annual Self-Monitoring Reports.** By the date specified in the MRP, the Discharger shall submit an annual self-monitoring report covering the previous calendar year. The report shall contain the following:
- 5.3.1.6.1. Comprehensive discussion of treatment plant performance, including documentation of any blending or other bypass events, and compliance with the permit. This discussion shall include any corrective actions taken or planned, such as changes to facility equipment or operation practices that may be needed to achieve compliance, and any other actions taken or planned that are intended to improve the performance and reliability of wastewater collection, treatment, or disposal practices;
- 5.3.1.6.2. List of approved analyses, including the following:
- 5.3.1.6.2.1. List of analyses for which the Discharger is certified;
- 5.3.1.6.2.2. List of analyses performed for the Discharger by a separate certified laboratory (copies of reports signed by the laboratory director of that laboratory need not be submitted but shall be retained onsite); and
- 5.3.1.6.2.3. List of “waived” analyses, as approved;
- 5.3.1.6.3. Plan view drawing or map showing the Discharger’s facility, flow routing, and sampling and observation station locations; and
- 5.3.1.6.4. Results of facility report reviews. The Discharger shall regularly review, revise, and update, as necessary, the Operation and Maintenance Manual, Contingency Plan, Spill Prevention Plan, and Wastewater Facilities Status Report so these documents remain useful and relevant to current practices. At a minimum, reviews shall be conducted annually. The Discharger shall describe or summarize its review and evaluation procedures, recommended or planned actions, and estimated time schedule for implementing these actions. The Discharger shall complete changes to these documents to ensure that they remain up-to-date.

5.4. Compliance Schedules – Not Supplemented

5.5. Twenty-Four Hour Reporting – Supplement to Attachment D, Provision 5.5

5.5.1. Oil or Other Hazardous Material Spills

- 5.5.1.1. Within 24 hours of becoming aware of a spill of oil or other hazardous material not contained onsite and completely cleaned up, the Discharger shall report as follows:
 - 5.5.1.1.1. If the spill exceeds reportable quantities for hazardous materials listed in 40 C.F.R. part 302, the Discharger shall call the California Office of Emergency Services (800 852-7550).
 - 5.5.1.1.2. If the spill does not exceed reportable quantities for hazardous materials listed in 40 C.F.R., part 302, the Discharger shall call the Regional Water Board (510-622-2369).
- 5.5.1.2. The Discharger shall submit a written report to the Regional Water Board within five working days following either of the above telephone notifications unless directed otherwise by Regional Water Board staff. A report submitted electronically is acceptable. The written report shall include the following:
 - 5.5.1.2.1. Date and time of spill, and duration if known;
 - 5.5.1.2.2. Location of spill (street address or description of location);
 - 5.5.1.2.3. Nature of material spilled;
 - 5.5.1.2.4. Quantity of material spilled;
 - 5.5.1.2.5. Receiving water body affected, if any;
 - 5.5.1.2.6. Cause of spill;
 - 5.5.1.2.7. Estimated size of affected area;
 - 5.5.1.2.8. Observed impacts to receiving waters (e.g., oil sheen, fish kill, water discoloration);
 - 5.5.1.2.9. Corrective actions taken to contain, minimize, or clean up the spill;
 - 5.5.1.2.10. Future corrective actions planned to prevent recurrence, and implementation schedule; and
 - 5.5.1.2.11. Persons or agencies notified.

5.5.2. Unauthorized Municipal Wastewater Treatment Plant Discharges¹

5.5.2.1. **Two-Hour Notification.** For any unauthorized discharge that enters a drainage channel or surface water, the Discharger shall, as soon as possible, but not later than two hours after becoming aware of the discharge, notify the California Office of Emergency Services (800-852-7550) and the local health officer or director of environmental health with jurisdiction over the affected water body. Notification shall include the following:

- 5.5.2.1.1. Incident description and cause;
- 5.5.2.1.2. Location of threatened or involved waterways or storm drains;
- 5.5.2.1.3. Date and time that the unauthorized discharge started;
- 5.5.2.1.4. Estimated quantity and duration of the unauthorized discharge (to the extent known), and estimated amount recovered;
- 5.5.2.1.5. Level of treatment prior to discharge (e.g., raw wastewater, primary-treated wastewater, or undisinfected secondary-treated wastewater); and
- 5.5.2.1.6. Identity of person reporting the unauthorized discharge.

5.5.2.2. **Five-Day Written Report.** Within five business days following the two-hour notification, the Discharger shall submit a written report that includes, in addition to the information listed in Provision 5.5.2.1, above, the following:

- 5.5.2.2.1. Methods used to delineate the geographical extent of the unauthorized discharge within receiving waters;
- 5.5.2.2.2. Efforts implemented to minimize public exposure to the unauthorized discharge;
- 5.5.2.2.3. Visual observations of the impacts (if any) noted in the receiving waters (e.g., fish kill, discoloration of receiving water) and extent of sampling if conducted;
- 5.5.2.2.4. Corrective measures taken to minimize the impact of the unauthorized discharge;

¹ California Code of Regulations, Title 23, section 2250(b), defines an unauthorized discharge to be a discharge, not regulated by waste discharge requirements, of treated, partially-treated, or untreated wastewater resulting from the intentional or unintentional diversion of wastewater from a collection, treatment, or disposal system.

- 5.5.2.2.5. Measures to be taken to minimize the potential for a similar unauthorized discharge in the future;
- 5.5.2.2.6. Summary of Spill Prevention Plan or Operation and Maintenance Manual modifications to be made, if necessary, to minimize the potential for future unauthorized discharges; and
- 5.5.2.2.7. Quantity and duration of the unauthorized discharge, and the amount recovered.

5.6. Planned Changes – Not Supplemented

5.7. Anticipated Noncompliance – Not Supplemented

5.8. Other Noncompliance – Not Supplemented

5.9. OTHER INFORMATION – NOT SUPPLEMENTED

6. STANDARD PROVISIONS – ENFORCEMENT – NOT SUPPLEMENTED

7. ADDITIONAL PROVISIONS – NOTIFICATION LEVELS – NOT SUPPLEMENTED

8. DEFINITIONS – ADDITION TO ATTACHMENT D

More definitions can be found in Attachment A of this NPDES Permit.

8.1. Arithmetic Calculations

8.1.1. **Geometric Mean.** The antilog of the log mean or the back-transformed mean of the logarithmically transformed variables, which is equivalent to the multiplication of the antilogarithms. The geometric mean can be calculated with either of the following equations:

$$\text{Geometric Mean} = \text{Anti log } (1/N \sum \text{Log } C_i)$$

or

$$\text{Geometric Mean} = (C_1 \times C_2 \times \dots \times C_N)^{1/N}$$

Where “N” is the number of data points for the period analyzed and “C” is the concentration for each of the “N” data points.

8.1.2. **Mass Emission Rate.** The rate of discharge expressed in mass. The mass emission rate is obtained from the following calculation for any calendar day:

$$\text{Mass emission rate (lb/day)} = \frac{8.345}{N} \sum_{i=1}^N Q_i C_i$$

$$\text{Mass emission rate (kg/day)} = \frac{3.785}{N} \sum_{i=1}^N Q_i C_i$$

In which “N” is the number of samples analyzed in any calendar day and “Q_i” and “C_i” are the flow rate (MGD) and the constituent concentration (mg/L) associated with each of the “N” grab samples that may be taken in any calendar day. If a composite sample is taken, “C_i” is the concentration measured in the composite sample and “Q_i” is the average flow rate occurring during the period over which the samples are composited. The daily concentration of a constituent measured over any calendar day shall be determined from the flow weighted average of the same constituent in the combined waste streams as follows:

$$C_d = \text{Average daily concentration} = \frac{1}{Q_t} \sum_{i=1}^N Q_i C_i$$

In which “N” is the number of component waste streams and “Q” and “C” are the flow rate (MGD) and the constituent concentration (mg/L) associated with each of the “N” waste streams. “Q_t” is the total flow rate of the combined waste streams.

- 8.1.3. **Removal Efficiency.** The ratio of pollutants removed by the treatment facilities to pollutants entering the treatment facilities (expressed as a percentage). The Discharger shall determine removal efficiencies using monthly averages (by calendar month unless otherwise specified) of pollutant concentration of influent and effluent samples collected at about the same time and using the following equation (or its equivalent):

$$\text{Removal Efficiency (\%)} = 100 \times [1 - (\text{Effluent Concentration} / \text{Influent Concentration})]$$

- 8.2. **Blending** – the practice of bypassing biological treatment units and recombining the bypass wastewater with biologically-treated wastewater.
- 8.3. **Composite Sample** – a sample composed of individual grab samples collected manually or by an automatic sampling device on the basis of time or flow as specified in the MRP. For flow-based composites, the proportion of each grab sample included in the composite sample shall be within plus or minus five percent (+/-5%) of the representative flow of the waste stream being measured at the time of grab sample collection. Alternatively, equal volume grab samples may be individually analyzed with the flow-weighted average calculated by averaging flow-weighted ratios of each grab sample analytical result. Grab samples comprising time-based composite samples shall be collected at intervals not greater than those specified in the MRP. The quantity of each grab sample comprising a time-

based composite sample shall be a set of flow proportional volumes as specified in the MRP. If a particular time-based or flow-based composite sampling protocol is not specified in the MRP, the Discharger shall determine and implement the most representative protocol.

- 8.4. Duplicate Sample** – a second sample taken from the same source and at the same time as an initial sample (such samples are typically analyzed identically to measure analytical variability).
- 8.5. Grab Sample** – an individual sample collected during a short period not exceeding 15 minutes. Grab samples represent only the condition that exists at the time the sample is collected.
- 8.6. Overflow** – the intentional or unintentional spilling or forcing out of untreated or partially-treated waste from a transport system (e.g., through manholes, at pump stations, or at collection points) upstream of the treatment plant headworks or from any part of a treatment plant.
- 8.7. Priority Pollutants** – those constituents referred to in 40 C.F.R. part 122 as promulgated in the Federal Register, Vol. 65, No. 97, Thursday, May 18, 2000, also known as the California Toxics Rule.
- 8.8. Untreated waste** – raw wastewater.

Table B
List of Monitoring Parameters, Analytical Methods, and Minimum Levels (µg/L)^[1]

CTR No.	Pollutant / Parameter	Analytical Method ^[2]	GC	GC MS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
1	Antimony	204.2	-	-	-	-	10	5	50	0.5	5	0.5	-	1000
2	Arsenic	206.3	-	-	-	20	-	2	10	2	2	1	-	1000
3	Beryllium	-	-	-	-	-	20	0.5	2	0.5	1	-	-	1000
4	Cadmium	200 or 213	-	-	-	-	10	0.5	10	0.25	0.5	-	-	1000
5a	Chromium (III)	SM 3500	-	-	-	-	-	-	-	-	-	-	-	-
5b	Chromium (VI)	SM 3500	-	-	-	10	5	-	-	-	-	-	-	1000
	Chromium (total) ^[3]	SM 3500	-	-	-	-	50	2	10	0.5	1	-	-	1000
6	Copper	200.9	-	-	-	-	25	5	10	0.5	2	-	-	1000
7	Lead	200.9	-	-	-	-	20	5	5	0.5	2	-	-	10,000
8	Mercury	1631 ^[4]	-	-	-	-	-	-	-	-	-	-	-	-
9	Nickel	249.2	-	-	-	-	50	5	20	1	5	-	-	1000
10	Selenium	200.8 or SM 3114B or C	-	-	-	-	-	5	10	2	5	1	-	1000
11	Silver	272.2	-	-	-	-	10	1	10	0.25	2	-	-	1000
12	Thallium	279.2	-	-	-	-	10	2	10	1	5	-	-	1000
13	Zinc	200 or 289	-	-	-	-	20	-	20	1	10	-	-	-
14	Cyanide	SM 4500 CN ⁻ C or I	-	-	-	5	-	-	-	-	-	-	-	-
15	Asbestos (only required for dischargers to MUN waters) ^[5]	100.2 ^[6]	-	-	-	-	-	-	-	-	-	-	-	-
16	2,3,7,8-TCDD and 17 congeners (Dioxin)	1613	-	-	-	-	-	-	-	-	-	-	-	-
17	Acrolein	603	2.0	5	-	-	-	-	-	-	-	-	-	-
18	Acrylonitrile	603	2.0	2	-	-	-	-	-	-	-	-	-	-
19	Benzene	602	0.5	2	-	-	-	-	-	-	-	-	-	-
33	Ethylbenzene	602	0.5	2	-	-	-	-	-	-	-	-	-	-
39	Toluene	602	0.5	2	-	-	-	-	-	-	-	-	-	-
20	Bromoform	601	0.5	2	-	-	-	-	-	-	-	-	-	-
21	Carbon Tetrachloride	601	0.5	2	-	-	-	-	-	-	-	-	-	-

CTR No.	Pollutant / Parameter	Analytical Method ^[2]	GC	GC MS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
22	Chlorobenzene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
23	Chlorodibromomethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
24	Chloroethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
25	2-Chloroethylvinyl Ether	601	1	1	-	-	-	-	-	-	-	-	-	-
26	Chloroform	601	0.5	2	-	-	-	-	-	-	-	-	-	-
75	1,2-Dichlorobenzene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
76	1,3-Dichlorobenzene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
77	1,4-Dichlorobenzene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
27	Dichlorobromomethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
28	1,1-Dichloroethane	601	0.5	1	-	-	-	-	-	-	-	-	-	-
29	1,2-Dichloroethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
30	1,1-Dichloroethylene or 1,1-Dichloroethene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
31	1,2-Dichloropropane	601	0.5	1	-	-	-	-	-	-	-	-	-	-
32	1,3-Dichloropropylene or 1,3-Dichloropropene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
34	Methyl Bromide or Bromomethane	601	1.0	2	-	-	-	-	-	-	-	-	-	-
35	Methyl Chloride or Chloromethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
36	Methylene Chloride or Dichloromethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
37	1,1,2,2-Tetrachloroethane	601	0.5	1	-	-	-	-	-	-	-	-	-	-
38	Tetrachloroethylene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
40	1,2-Trans-Dichloroethylene	601	0.5	1	-	-	-	-	-	-	-	-	-	-
41	1,1,1-Trichloroethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
42	1,1,2-Trichloroethane	601	0.5	2	-	-	-	-	-	-	-	-	-	-
43	Trichloroethene	601	0.5	2	-	-	-	-	-	-	-	-	-	-
44	Vinyl Chloride	601	0.5	2	-	-	-	-	-	-	-	-	-	-
45	2-Chlorophenol	604	2	5	-	-	-	-	-	-	-	-	-	-
46	2,4-Dichlorophenol	604	1	5	-	-	-	-	-	-	-	-	-	-

CTR No.	Pollutant / Parameter	Analytical Method ^[2]	GC	GC MS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
47	2,4-Dimethylphenol	604	1	2	-	-	-	-	-	-	-	-	-	-
48	2-Methyl-4,6-Dinitrophenol or Dinitro-2-methylphenol	604	10	5	-	-	-	-	-	-	-	-	-	-
49	2,4-Dinitrophenol	604	5	5	-	-	-	-	-	-	-	-	-	-
50	2-Nitrophenol	604	-	10	-	-	-	-	-	-	-	-	-	-
51	4-Nitrophenol	604	5	10	-	-	-	-	-	-	-	-	-	-
52	3-Methyl-4-Chlorophenol	604	5	1	-	-	-	-	-	-	-	-	-	-
53	Pentachlorophenol	604	1	5	-	-	-	-	-	-	-	-	-	-
54	Phenol	604	1	1	-	50	-	-	-	-	-	-	-	-
55	2,4,6-Trichlorophenol	604	10	10	-	-	-	-	-	-	-	-	-	-
56	Acenaphthene	610 HPLC	1	1	0.5	-	-	-	-	-	-	-	-	-
57	Acenaphthylene	610 HPLC	-	10	0.2	-	-	-	-	-	-	-	-	-
58	Anthracene	610 HPLC	-	10	2	-	-	-	-	-	-	-	-	-
60	Benzo(a)Anthracene or 1,2 Benzanthracene	610 HPLC	10	5	-	-	-	-	-	-	-	-	-	-
61	Benzo(a)Pyrene	610 HPLC	-	10	2	-	-	-	-	-	-	-	-	-
62	Benzo(b) Fluoranthene or 3,4 Benzofluoranthene	610 HPLC	-	10	10	-	-	-	-	-	-	-	-	-
63	Benzo(ghi)Perylene	610 HPLC	-	5	0.1	-	-	-	-	-	-	-	-	-
64	Benzo(k)Fluoranthene	610 HPLC	-	10	2	-	-	-	-	-	-	-	-	-
74	Dibenzo(a,h)Anthracene	610 HPLC	-	10	0.1	-	-	-	-	-	-	-	-	-
86	Fluoranthene	610 HPLC	10	1	0.05	-	-	-	-	-	-	-	-	-
87	Fluorene	610 HPLC	-	10	0.1	-	-	-	-	-	-	-	-	-
92	Indeno(1,2,3-cd)Pyrene	610 HPLC	-	10	0.05	-	-	-	-	-	-	-	-	-
100	Pyrene	610 HPLC	-	10	0.05	-	-	-	-	-	-	-	-	-
68	Bis(2-Ethylhexyl)Phthalate	606 or 625	10	5	-	-	-	-	-	-	-	-	-	-
70	Butylbenzyl Phthalate	606 or 625	10	10	-	-	-	-	-	-	-	-	-	-
79	Diethyl Phthalate	606 or 625	10	2	-	-	-	-	-	-	-	-	-	-
80	Dimethyl Phthalate	606 or 625	10	2	-	-	-	-	-	-	-	-	-	-
81	Di-n-Butyl Phthalate	606 or 625	-	10	-	-	-	-	-	-	-	-	-	-
84	Di-n-Octyl Phthalate	606 or 625	-	10	-	-	-	-	-	-	-	-	-	-

CTR No.	Pollutant / Parameter	Analytical Method ^[2]	GC	GC MS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
59	Benzidine	625	-	5	-	-	-	-	-	-	-	-	-	-
65	Bis(2-Chloroethoxy)Methane	625	-	5	-	-	-	-	-	-	-	-	-	-
66	Bis(2-Chloroethyl)Ether	625	10	1	-	-	-	-	-	-	-	-	-	-
67	Bis(2-Chloroisopropyl) Ether	625	10	2	-	-	-	-	-	-	-	-	-	-
69	4-Bromophenyl Phenyl Ether	625	10	5	-	-	-	-	-	-	-	-	-	-
71	2-Chloronaphthalene	625	-	10	-	-	-	-	-	-	-	-	-	-
72	4-Chlorophenyl Phenyl Ether	625	-	5	-	-	-	-	-	-	-	-	-	-
73	Chrysene	625	-	10	5	-	-	-	-	-	-	-	-	-
78	3,3'-Dichlorobenzidine	625	-	5	-	-	-	-	-	-	-	-	-	-
82	2,4-Dinitrotoluene	625	10	5	-	-	-	-	-	-	-	-	-	-
83	2,6-Dinitrotoluene	625	-	5	-	-	-	-	-	-	-	-	-	-
85	1,2-Diphenylhydrazine ^[7]	625	-	1	-	-	-	-	-	-	-	-	-	-
88	Hexachlorobenzene	625	5	1	-	-	-	-	-	-	-	-	-	-
89	Hexachlorobutadiene	625	5	1	-	-	-	-	-	-	-	-	-	-
90	Hexachlorocyclopentadiene	625	5	5	-	-	-	-	-	-	-	-	-	-
91	Hexachloroethane	625	5	1	-	-	-	-	-	-	-	-	-	-
93	Isophorone	625	10	1	-	-	-	-	-	-	-	-	-	-
94	Naphthalene	625	10	1	0.2	-	-	-	-	-	-	-	-	-
95	Nitrobenzene	625	10	1	-	-	-	-	-	-	-	-	-	-
96	N-Nitrosodimethylamine	625	10	5	-	-	-	-	-	-	-	-	-	-
97	N-Nitrosodi-n-Propylamine	625	10	5	-	-	-	-	-	-	-	-	-	-
98	N-Nitrosodiphenylamine	625	10	1	-	-	-	-	-	-	-	-	-	-
99	Phenanthrene	625	-	5	0.05	-	-	-	-	-	-	-	-	-
101	1,2,4-Trichlorobenzene	625	1	5	-	-	-	-	-	-	-	-	-	-
102	Aldrin	608	0.005	-	-	-	-	-	-	-	-	-	-	-
103	α-BHC	608	0.01	-	-	-	-	-	-	-	-	-	-	-
104	β-BHC	608	0.005	-	-	-	-	-	-	-	-	-	-	-
105	γ-BHC (Lindane)	608	0.02	-	-	-	-	-	-	-	-	-	-	-
106	δ-BHC	608	0.005	-	-	-	-	-	-	-	-	-	-	-
107	Chlordane	608	0.1	-	-	-	-	-	-	-	-	-	-	-

Item No. 9 - Attachment

Livermore-Amador Valley Water Management Agency (LAVWMA)
LAVWMA Export and Storage Facilities
Intermittent Wet Weather Discharge

Order No. R2-2026-XXXX
NPDES Permit No. CA0038679

CTR No.	Pollutant / Parameter	Analytical Method ^[2]	GC	GC MS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
108	4,4'-DDT	608	0.01	-	-	-	-	-	-	-	-	-	-	-
109	4,4'-DDE	608	0.05	-	-	-	-	-	-	-	-	-	-	-
110	4,4'-DDD	608	0.05	-	-	-	-	-	-	-	-	-	-	-
111	Dieldrin	608	0.01	-	-	-	-	-	-	-	-	-	-	-
112	Endosulfan (alpha)	608	0.02	-	-	-	-	-	-	-	-	-	-	-
113	Endosulfan (beta)	608	0.01	-	-	-	-	-	-	-	-	-	-	-
114	Endosulfan Sulfate	608	0.05	-	-	-	-	-	-	-	-	-	-	-
115	Endrin	608	0.01	-	-	-	-	-	-	-	-	-	-	-
116	Endrin Aldehyde	608	0.01	-	-	-	-	-	-	-	-	-	-	-
117	Heptachlor	608	0.01	-	-	-	-	-	-	-	-	-	-	-
118	Heptachlor Epoxide	608	0.01	-	-	-	-	-	-	-	-	-	-	-
119-125	PCBs: Aroclors 1016, 1221, 1232, 1242, 1248, 1254, 1260	608	0.5	-	-	-	-	-	-	-	-	-	-	-
126	Toxaphene	608	0.5	-	-	-	-	-	-	-	-	-	-	-

Footnotes:

- ^[1] Minimum levels are from the *State Implementation Policy*. They are the concentration of the lowest calibration standard for that technique based on a survey of contract laboratories. Laboratory techniques are defined as follows: GC = Gas Chromatography; GCMS = Gas Chromatography/Mass Spectrometry; LC = High Pressure Liquid Chromatography; Color = Colorimetric; FAA = Flame Atomic Absorption; GFAA = Graphite Furnace Atomic Absorption; ICP = Inductively Coupled Plasma; ICPMS = Inductively Coupled Plasma/Mass Spectrometry; SPGFAA = Stabilized Platform Graphite Furnace Atomic Absorption (i.e., U.S. EPA 200.9); Hydride = Gaseous Hydride Atomic Absorption; CVAA = Cold Vapor Atomic Absorption; DCP = Direct Current Plasma.
- ^[2] The suggested method is the U.S. EPA Method unless otherwise specified (SM = Standard Methods). The Discharger may use another U.S. EPA-approved or recognized method if that method has a level of quantification below the applicable water quality objective. Where no method is suggested, the Discharger has the discretion to use any standard method.
- ^[3] Analysis for total chromium may be substituted for analysis of chromium (III) and chromium (VI) if the concentration measured is below the lowest hexavalent chromium criterion (11 ug/l).
- ^[4] The Discharger shall use ultra-clean sampling (U.S. EPA Method 1669) and ultra-clean analytical methods (U.S. EPA Method 1631) for mercury monitoring. The minimum level for mercury is 2 ng/l (or 0.002 ug/l).
- ^[5] MUN = Municipal and Domestic Supply. This designation, if applicable, is in the Findings of the permit.
- ^[6] Determination of Asbestos Structures over 10 [micrometers] in Length in Drinking Water Using MCE Filters, U.S. EPA 600/R-94-134, June 1994.
- ^[7] Detected as azobenzene

ITEM NO. 10 – LAVWMA QUARTERLY REPORT OF OPERATIONS, 4th QUARTER FY2025-26

To: LAVWMA Board of Directors

From: Levi Fuller, General Manager

Subject: Quarterly Report of Operation, 4th Quarter, FY2025-26

Action Requested

None at this time. This is an information item only.

Summary

LAVWMA's Quarterly Report of Operations for the 4th Quarter, FY 2025-2026 is attached for the Board's review. These quarterly reports are prepared by DSRSD staff and summarize all LAVWMA operations and maintenance activity for each quarter.

During the 4th Quarter there were no major outages or disruptions while 930 million gallons of LAVWMA fully treated effluent and conveyed to the East Bay Discharge Authority. Of the ~930 MG of effluent conveyed through the LAVWMA system during this quarter, 120 MG (12.9%) came from Dublin San Ramon (DSR), 395 MG (42.5%) from the City of Livermore, and 415 MG (44.6%) from the City of Pleasanton.

DSRSD staff did a wonderful job operating and maintaining LAVWMA facilities during the 4th Quarter. After four quarters of the year:

	YTD	Budget	Percentage
Overall Costs	\$3,363,239	\$3,600,735	93.4
Utilities Costs	\$1,924,654	\$2,025,350	95.0
Labor Costs	\$1,295,112	\$1,249,300	103.7
Labor Hours	5,698.8	5,480	104.0

The California Regional Water Quality Control Board, San Francisco Region ("Regional Water Board") conducted site inspections at the LAVWMA pump station (February 2026) and the San Leandro Sample Station (June 16, 2026). No violations or corrective actions were identified during the inspections.

On June 15, 2026, DSRSD submitted LAVWMA's Annual Self-Monitoring Report to the Regional Water Board.

Dan Gill, DSRSD Operations Director, will be available to answer any questions from the Board.

Recommendation

None at this time. This is an information item only.

Attachment

A. LAVWMA Quarterly Report of Operations, 4th Quarter, FY2025-2026



LAVWMA

QUARTERLY REPORT OF OPERATIONS

FY 2025-2026, 4th Quarter



Item No. 10 - Attachment

**Quarterly Report of Operations
LAVWMA Pumping and Conveyance System**

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Executive Summary

For the fourth quarter in fiscal year 2026 (Q4 FY 2026), the Livermore-Amador Valley Water Management Agency (LAVWMA) export conveyance system experienced no major outages or disruptions while pumping 930 million gallons (MG) of fully treated secondary effluent to the San Francisco Bay via the East Bay Dischargers Authority (EBDA) outfall diffuser and San Leandro Sample Station (SLSS; Table 6 or section Export Flow for more details).

This quarter the overall efficiency of the pumping system averaged 71.9% (Table 1; quarterly range FYs 2024 & 2025 [n=8]: 72.6% to 75.3%), with an average electrical cost of \$402 per MG, or \$131 per acre-foot (AF; Table 1 or section Electrical Usage, Efficiency, & Cost for more details). Preventative maintenance (PM) work orders outnumbered corrective maintenance (CM) work orders 23.3 to 1 (quarterly range FYs 2024 & 2025 [n=8]: 13.87 to 32.29; section Maintenance for more details).

For convenience, some year-to-date (YTD) values compared to budgeted are shown below (section Expenditures & Budget Utilization: Labor & O&M for more details).

- Overall costs: YTD \$3,363,239; Budget \$3,600,735
- Utilities costs: YTD \$1,924,654; Budget \$2,025,350
- Labor costs: YTD \$1,295,112; Budget \$1,249,300
- Labor hours: YTD 5,698.8; Budget 5,480
- WOs last quarter: 151.5 hours 168 PMs and 48.5 hours 16 CMs
- WOs this quarter: 145.35 hours 140 PMs and 10 hours 6 CMs
- Pump Efficiency: Apr-72.0% | May-72.1% | Jun-71.1%

Current Quarter Metrics

Monthly export flows were consistent with normal operations (Figure 1). Pump efficiency ranged from about 71% to 72%.

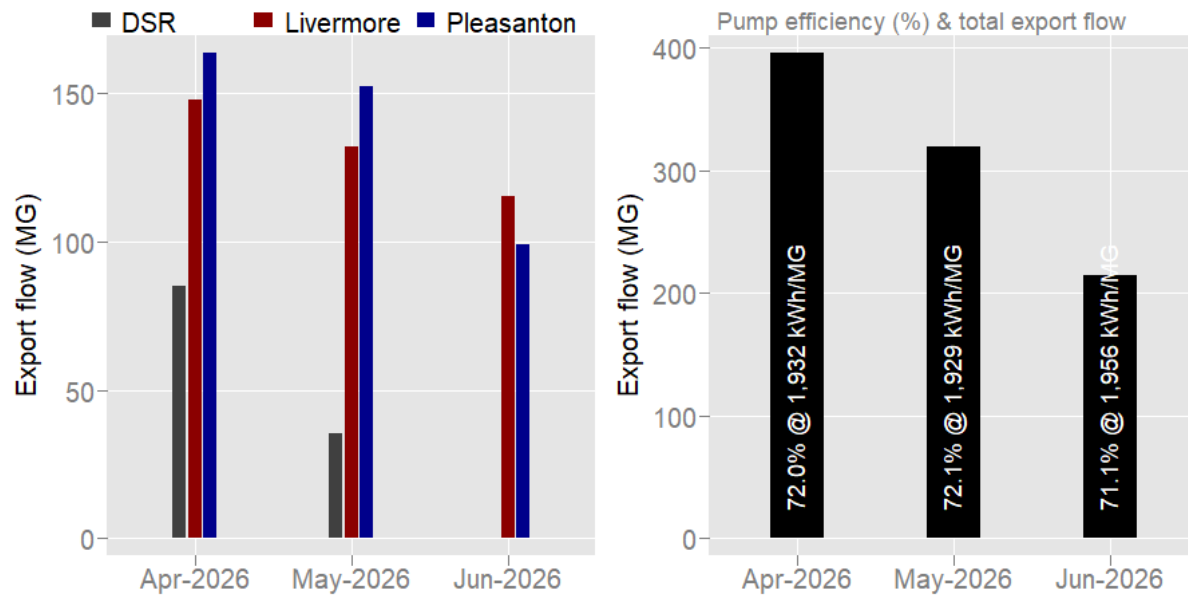


Figure 1 - LAVWMA Q4 FY 2026 export flows for Apr-2026, May-2026, & Jun-2026; monthly flows shown by source (left plot) and as total (right plot) with pump efficiency (%) at noted kilowatt hour (kWh) per million gallons (MG); NOTE: flow & pump efficiency data displayed by calendar month, not PG&E billing period

Most power usage (as kWh) for feeders A & B was during off-peak or super off-peak hours (Figure 2).

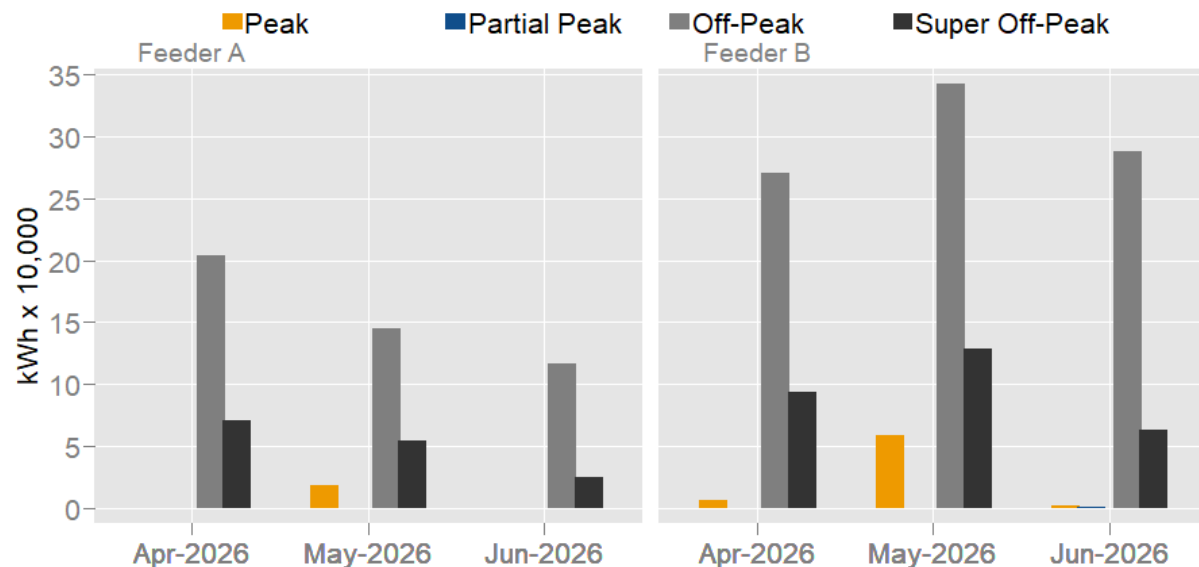


Figure 2 - LAVWMA Q4 FY 2026 electric usage as kilowatt hour (kWh) for PG&E billing cycles Apr-2026, May-2026, & Jun-2026; billing cycle usage displayed separately for feeder A (left) & feeder B (right) by time of use: peak, partial peak, off-peak; & super off-peak

Labor and utilities covered the largest fraction of overall cost in Q\$ FY 2026 (Figure 3, 3 left-most plots). June expenditure included PG&E electric delivery charges for Mar-Jun.

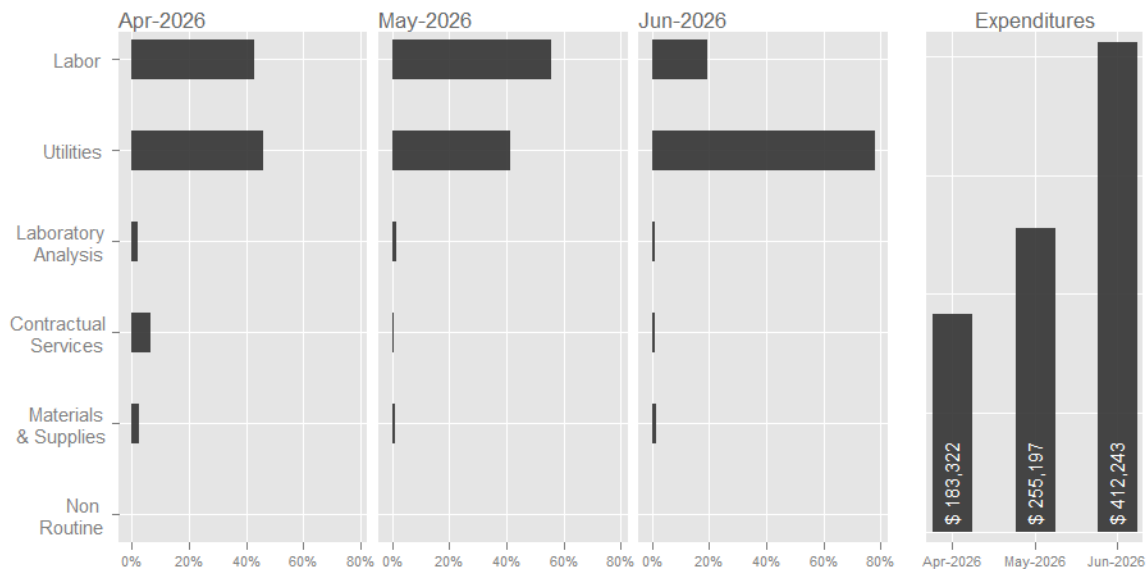


Figure 3 - LAVWMA Q3 FY 2026 expenditures for Apr-2026, May-2026, & Jun-2026 as percent of total cost by type (labor, utilizes, laboratory analysis, contractual services, materials & supplies, & non routine; left plot) and as monthly total (right plot)

There were no major equipment failures in Q4 FY 2026, the pipeline and pumping plant ran without issue. Preventative maintenance (PM) work orders exceeded corrective maintenance (CM) work orders each month during Q4 FY 2026 (Figure 4, right plot).

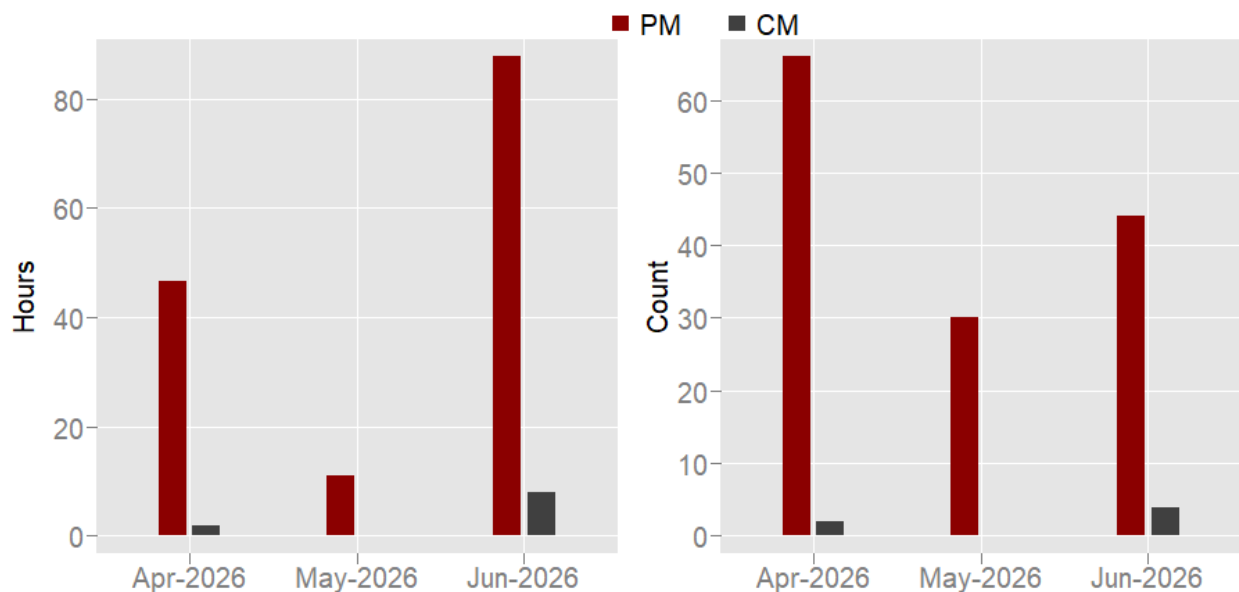


Figure 4 - LAVWMA Q4 FY 2026 preventative maintenance (PM) & corrective maintenance (CM) work order hours (left plot) and count (right plot) for Apr-2026, May-2026, & Jun-2026

Operations

Of the ~930 MG of effluent conveyed through the LAVWMA system during this quarter, 120 MG (12.9%) came from Dublin San Ramon (DSR), 395 MG (42.5%) from the City of Livermore, and 415 MG (44.6%) from the City of Pleasanton. Refer to section Export Flow for more details.

PG&E's current rate plan has four time-of-use (TOU) periods (in order of decreasing rates): peak (year-round), partial peak (June-September), off-peak (year-round), and super off-peak (March-May). Whenever possible, staff implement an efficient pumping plan to avoid pumping during higher rate periods (i.e., peak and partial peak).

Over the past quarter, DSRSD staff utilized the LAVWMA holding basin capacity to reduce the number of pumps in operation, thereby maximizing electrical savings. Flows into LAVWMA vary throughout the day and increase during rain events.

Maintenance

During the quarter, staff logged 143.35 hours completing 140 preventative maintenance (PM) work orders and 10.0 hours completing 6 corrective maintenance (CM) work orders on LAVWMA equipment and systems. Refer to Figure 4 for monthly breakdown (work order data updated 28-Jul-2026).

Pump 7 remains out of service due to vibration issues. On August 5, wastewater operators, electricians, and mechanical maintenance will perform a motor swap with pump 2. This test will determine if motor 7 has issues or if rebuilt pump number 7 is the issue.

The following are some additional noteworthy maintenance activities during the quarter:

Electrical

- Received quotes for switchgear maintenance at Pump Station
- Responded to PG&E power outage and deployed temporary generator due to failed standby generator
- Supported Carollo Engineers asset assessment at Pump Station
- Troubleshoot issues with Motor #8 at Pump Station

Instrumentation & Controls

- Supported CIP 23-L005 SLSS Improvements Project
- Calibrated pH sensors at Pump Station
- Responded to EBDA flowmeter damaged by Contractor at SLSS
- Troubleshoot issues with motor temperature sensors at Pump Station

Mechanical

- Observed stable conditions and water levels with Greenvue vault (lid); following up with contractor
- Continued troubleshooting pump 7; new coupling did not resolve problem
- Worked on repair for failed pump 8 check valve; still out of service

Operations

- Routine operation

Laboratory

- Routine operation

Electrical Usage, Efficiency, & Cost

Monthly pump efficiency (O_e) was estimated as the fraction of a calculated kWh/MG given full efficiency (i.e., 100%) to the actual kWh/MG (see equations below).

$$O_e = \frac{\text{full efficiency kWh}}{\text{actual kWh}} \times 100$$

$$\text{Full Efficiency kWh} = \frac{\overline{GPM} \times TDH}{3960} \times 0.746 \times d \times 24h$$

where

- $\overline{GPM} = \frac{\text{Export Flow (MG)} \times 10^6}{d \times 1440 \text{ min/d}}$
- TDH (total dynamic head) = 442.8 ft (static lift = 408.8 ft, piping losses = 34 ft)
- 3960 = units conversion constant for water between 40° F and 220° F
- 0.746 = horsepower to kW conversion constant (0.746 hp / kW)
- d = number of days
- h = indicates hour (as 24 hours/day)

Table 1 - LAVWMA FY 2026 quarterly kWh usage, export flow, pump efficiency, & cost for PG&E-based billing cycle; current quarter & year-to-date (YTD) summaries provided below monthly values

	Billing Days	kWh	Flow (MG)	kWh/MG	Pump Efficiency	Cost (\$)	\$/kWh	\$/MG	\$/AF
Q1									
Jul-2025	33	345,610	175	1,972.36	70.5%	\$118,807	\$0.34	\$678	\$221
Aug-2025	29	321,405	165	1,948.91	71.3%	\$110,252	\$0.34	\$669	\$218
Sep-2025	30	384,737	198	1,945.93	71.4%	\$72,144	\$0.19	\$365	\$119
Q2									
Oct-2025	32	640,706	345	1,858.79	74.8%	\$195,364	\$0.30	\$567	\$185
Nov-2025	30	752,596	407	1,847.00	75.3%	\$156,774	\$0.21	\$385	\$125
Dec-2025	30	902,415	472	1,913.17	72.7%	\$192,022	\$0.21	\$407	\$133
Q3									
Jan-2026	32	1,069,377	564	1,897.10	73.3%	\$255,881	\$0.24	\$454	\$148
Feb-2026	30	897,138	465	1,928.44	72.1%	\$191,351	\$0.21	\$411	\$134
Mar-2026	32	1,096,552	567	1,934.23	71.9%	\$229,710	\$0.21	\$405	\$132
Q4									
Apr-2026	29	645,534	335	1,929.53	72.1%	\$138,937	\$0.22	\$415	\$135
May-2026	29	748,010	387	1,930.86	72.0%	\$140,227	\$0.19	\$362	\$118
Jun-2026	29	494,612	255	1,937.53	71.8%	\$109,319	\$0.22	\$428	\$140
Q4									
Average		629,385	326	1,933	71.9%	\$129,494	\$0.21	\$402	\$131
Total	87	1,888,155	977	5,798		\$388,482			
Minimum		897,138	465	1,897	71.8%	\$191,351	\$0.19	\$362	\$118
Maximum		748,010	387	1,938	72.1%	\$140,227	\$0.22	\$428	\$140
YTD									
Average		691,558	361	1,920	72.4%	\$159,232	\$0.24	\$462	\$151
Total	365	8,298,692	4,335	23,044		\$1,910,788			
Minimum		321,405	165	1,847	70.5%	\$72,144	\$0.19	\$362	\$118
Maximum		1,096,552	567	1,972	75.3%	\$255,881	\$0.34	\$678	\$221

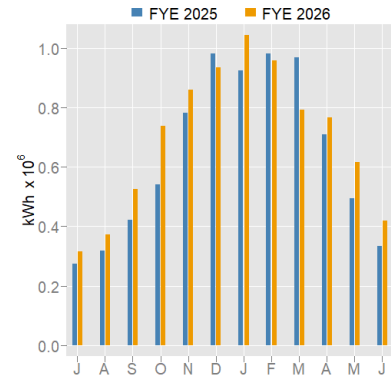


Figure 5 - LAVWMA monthly kWh usage FY 2025 & FY 2026 through Jun-2026; note: plotted kWh values by calendar month, not PG&E-based billing cycle

Table 2 - LAVWMA FY 2026 quarterly kWh usage and cost for PG&E-based billing cycle separately for Service A & Service B

	Service A				Service B				
	Peak (kWh)	Partial Peak (kWh)	Off-Peak (kWh)	Super Off Peak (kWh)	Cost (\$)	Peak (kWh)	Partial Peak (kWh)	Off-Peak (kWh)	Super Off Peak (kWh)
Q1									
Jul-2025	0	0	0	0	\$3,822	2,105	1,928	341,577	0
Aug-2025	0	7,127	59,482	0	\$30,986	1,962	10,724	242,110	0
Sep-2025	0	1,290	108,787	0	\$34,095	2,119	16,103	256,439	0
Q2									
Oct-2025	7,508	17,344	603,852	0	\$143,769	2,216	1,146	8,641	0
Nov-2025	1,874	0	740,506	0	\$151,466	2,068	0	8,148	0
Dec-2025	0	0	672,276	0	\$142,328	2,958	0	227,181	0
Q3									
Jan-2026	29,541	0	788,761	0	\$193,254	3,194	0	247,881	0
Feb-2026	0	0	499,368	0	\$104,099	2,487	0	395,284	0
Mar-2026	23,447	0	581,231	48,605	\$137,582	11,258	0	394,631	37,381
Q4									
Apr-2026	0	0	204,061	70,263	\$59,558	6,239	0	270,803	94,168
May-2026	18,756	0	145,127	54,323	\$41,351	58,546	0	343,039	128,219
Jun-2026	0	0	116,154	25,167	\$32,532	1,743	577	288,304	62,667
Q4									
Average	6,252	0	155,114	49,918	\$44,480	22,176	192	300,715	95,018
Total	18,756	0	465,342	149,753	\$133,440	66,528	577	902,146	285,053
Minimum	0	0	116,154	25,167	\$32,532	1,743	0	270,803	62,667
Maximum	18,756	0	204,061	70,263	\$59,558	58,546	577	343,039	128,219
YTD									
Average	6,761	2,147	376,634	16,530	\$89,570	8,074	2,540	252,003	26,869
Total	81,126	25,761	4,519,604	198,358	\$1,074,840	96,893	30,477	3,024,038	322,434
Minimum	0	0	0	0	\$3,822	1,743	0	8,148	0
Maximum	29,541	17,344	788,761	70,263	\$193,254	58,546	16,103	395,284	128,219

Pump Run Time

Monthly pump utilization (U_m) was calculated as the fraction of total pump hours given the total hours possible if nine¹ pumps ran continuously (i.e., 24 hours per day; equation below, where h = total hours, m = given month, d = days in month). Pump utilization varied between ~15% and 28% in Q4 (Table 4).

$$U_m = \frac{h_m}{9 \times 24 \times d_m} \times 100$$

Table 3 - LAVWMA FY 2026 monthly pump hours by pump and total; quarterly and YTD summaries provided below monthly values

Hours	Pump 1	Pump 2	Pump 3	Pump 4	Pump 5	Pump 6	Pump 7	Pump 8	Pump 9	Pump 10	Total
Q1											
Jul-2025	71	334	0	0	0	0	1	0	291	0	697
Aug-2025	178	292	58	0	61	0	0	0	283	0	872
Sep-2025	257	117	215	0	354	3	0	84	106	220	1,356
Q2											
Oct-2025	478	0	417	0	416	0	0	479	0	192	1,982
Nov-2025	505	0	411	0	488	0	0	513	323	0	2,240
Dec-2025	452	81	453	0	475	56	0	166	394	313	2,391
Q3											
Jan-2026	104	503	523	0	549	109	0	557	273	0	2,619
Feb-2026	0	447	460	0	438	181	0	411	434	0	2,373
Mar-2026	321	289	55	101	160	202	0	131	428	256	1,944
Q4											
Apr-2026	73	0	57	560	1	0	0	76	573	472	1,812
May-2026	156	197	0	287	0	0	0	6	482	316	1,445
Jun-2026	26	71	0	312	0	0	12	299	255	0	975
	Pump 1	Pump 2	Pump 3	Pump 4	Pump 5	Pump 6	Pump 7	Pump 8	Pump 9	Pump 10	Total
Q1											
Average Hours	169	248	91	0	138	1	0	28	227	73	975
Std Dev Hours	92.9	115.0	111.2	0.0	189.5	1.7	0.4	48.5	104.6	127.2	341.3
Hours	506	743	273	0	415	3	1	84	680	220	2,925
Min Hours	71	117	0	0	0	0	0	0	106	0	697
Max Hours	257	334	215	0	354	3	1	84	291	220	1,356
Q2											
Average Hours	479	27	427	0	460	19	0	386	239	168	2,204
Std Dev Hours	26.6	46.7	22.9	0.0	38.2	32.6	0.0	191.5	210.0	157.7	206.6
Hours	1,436	81	1,281	0	1,379	56	0	1,158	717	505	6,612
Min Hours	452	0	411	0	416	0	0	166	0	0	1,982
Max Hours	505	81	453	0	488	56	0	513	394	313	2,391
Q3											
Average Hours	141	412.9	346	34	382	164.4	0	366.7	378	85.5	2,312
Std Dev Hours	163.6	110.7	254.2	58.2	200.3	48.7	0.0	216.6	91.2	148.1	341.6
Hours	424	1,238.8	1,039	101	1,147	493	0	1,100	1,135	256	6,935
Min Hours	0	289	55	0	160	109	0	131	273	0	1,944
Max Hours	321	502.8	523	101	549	202	0	557	434	256	2,619
Q4											
Average Hours	85	90	19	386	0	0	4	127	437	263	1,410
Std Dev Hours	65.5	100.0	33.1	151.4	0.4	0.1	6.8	152.9	163.7	240.5	419.6
Hours	255	269	58	1,159	1	0	12	380	1,310	788	4,231
Min Hours	26	0	0	287	0	0	0	6	255	0	975
Max Hours	156	197	57	560	1	0	12	299	573	472	1,812
Total Average Hours	218	194	221	105	245	46	1	227	320	147	1,725
Total Std Dev Hours	181.5	176.9	214.1	183.7	226.3	76.0	3.4	213.6	158.8	168.1	647.4
Total Hours	2,622	2,331.2	2,651	1,259	2,942	553	12	2,722	3,842	1,770	20,704
Total Min Hours	0	0	0	0	0	0	0	0	0	0	697
Total Max Hours	505	502.8	523	560	549	202	12	557	573	472	2,619

Table 4 - LAVWMA FY 2026 monthly percent pump utilization; quarterly and YTD summaries provided below monthly values

	Pump Utilization on
Q1	
Jul-2025	10.4%
Aug-2025	13.0%
Sep-2025	20.9%
Q2	
Oct-2025	29.6%
Nov-2025	34.6%
Dec-2025	35.7%
Q3	
Jan-2026	39.1%
Feb-2026	39.2%
Mar-2026	29.0%
Q4	
Apr-2026	28.0%
May-2026	21.6%
Jun-2026	15.0%
Q1	
Average Pump Utilization	14.8%
Min Pump Utilization	10.4%
Max Pump Utilization	20.9%
Q2	
Average Pump Utilization	33.3%
Min Pump Utilization	29.6%
Max Pump Utilization	35.7%
Q3	
Average Pump Utilization	35.8%
Min Pump Utilization	29.0%
Max Pump Utilization	39.2%
Q4	
Average Pump Utilization	21.5%
Min Pump Utilization	15.0%
Max Pump Utilization	28.0%
Total Average Pump Utilization	26.3%
Total Min Pump Utilization	10.4%
Total Max Pump Utilization	39.2%

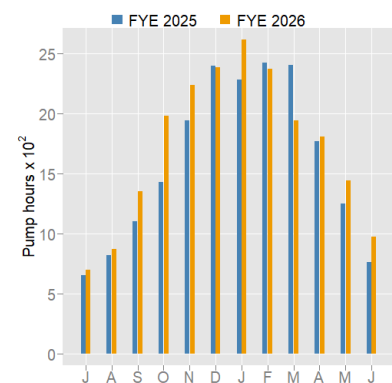


Figure 6- LAVWMA FY 2025 & FY 2026 monthly total pump hours through Jun-2026

¹ Ten pumps total, but one in reserve as a back-up to the other nine

Basin Levels

Table 5 - LAVWMA FY 2026 monthly average levels (in feet) by basin and overall (total); current quarter and YTD summaries provided below monthly values

Average	Basin 1	Basin 2	Basin 3	Total
Q1				
Jul-2025	2.54	0.73	3.66	2.31
Aug-2025	4.80	0.18	5.90	3.63
Sep-2025	4.77	1.02	5.38	3.72
Q2				
Oct-2025	3.60	2.37	4.07	3.35
Nov-2025	4.19	2.02	3.62	3.28
Dec-2025	3.66	0.26	3.24	2.38
Q3				
Jan-2026	3.04	0.24	5.95	3.07
Feb-2026	3.03	0.34	4.81	2.72
Mar-2026	2.49	0.20	2.63	1.77
Q4				
Apr-2026	4.09	0.23	4.89	3.07
May-2026	3.07	0.22	3.44	2.24
Jun-2026	3.09	0.20	1.78	1.69
Q4				
Average	3.41	0.21	3.37	2.33
Minimum	3.07	0.20	1.78	1.69
Maximum	4.09	0.23	4.89	3.07
YTD				
Average	3.53	0.67	4.11	2.77
Minimum	2.49	0.18	1.78	1.69
Maximum	4.80	2.37	5.95	3.72

Export Flow

Combined export flow includes Dublin San Ramon, the City of Livermore, and the City of Pleasanton. Monthly totals do not include flows diverted for recycling use by DERWA and Pleasanton. Budgeted FY 2026 flow is 4,520 MG at an estimated cost of \$797/MG.

Table 6 - LAVWMA FY 2026 monthly export flows in million gallons (MG) for Dublin San Ramon, Livermore, & Pleasanton; current quarter and YTD summaries provided below monthly values; note totals (quarterly & YTD) provided in with monthly summary

	Dublin San Ramon (MG)	Livermore (MG)	Pleasanton (MG)	Combined Export (MG)
Q1	0.00	371.96	259.49	631.45
Jul-2025	0.00	102.33	57.51	159.84
Aug-2025	0.00	111.79	79.96	191.75
Sep-2025	0.00	157.84	122.03	279.87
Q2	366.40	475.79	503.49	1,345.69
Oct-2025	99.46	145.08	154.77	399.31
Nov-2025	124.33	161.90	169.90	456.13
Dec-2025	142.62	168.81	178.82	490.25
Q3	402.33	496.49	552.08	1,450.91
Jan-2026	163.78	179.85	201.45	545.08
Feb-2026	150.09	162.60	183.27	495.95
Mar-2026	88.47	154.04	167.36	409.87
Q4	119.98	395.07	415.21	930.27
Apr-2026	84.82	147.78	163.66	396.25
May-2026	35.16	132.07	152.47	319.71
Jun-2026	0.00	115.22	99.09	214.31
Total	888.72	1,739.31	1,730.28	4,358.31
Q4				
Average	39.99	131.69	138.40	310.09
Minimum	0.00	115.22	99.09	214.31
Maximum	84.82	147.78	163.66	396.25
YTD				
Average	74.06	144.94	144.19	363.19
Minimum	0.00	102.33	57.51	159.84
Maximum	163.78	179.85	201.45	545.08

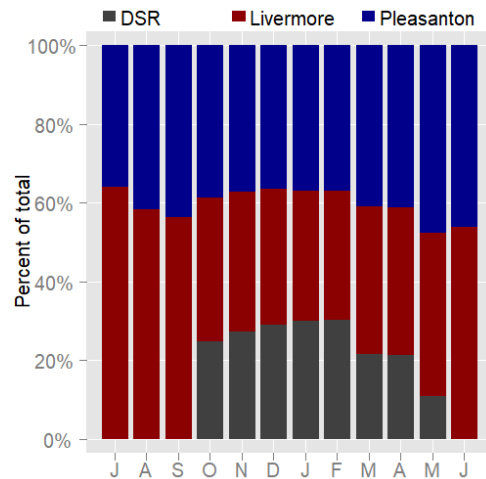


Figure 7- LAVWMA FY 2026 through Jun-2026 monthly export flows by region as a percent of total; DSR = Dublin San Ramon

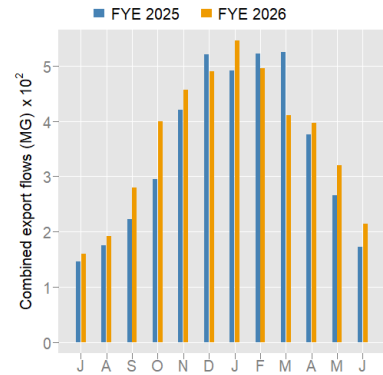


Figure 8 - LAVWMA FY 2025 & FY 2026 through Jun-2026 monthly combined export flows (MG)

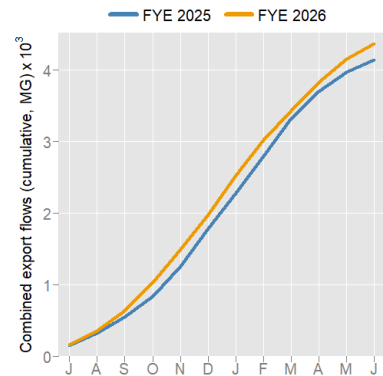


Figure 9 - LAVWMA FY 2025 & FY 2026 through Jun-2026 monthly cumulative combined export flows (MG)

Expenditures & Budget Utilization: Labor & O&M

Expenses this quarter included the coupler for pump 7, smart cover supplies, and motor 4 junction box & valve control cabinet.

Table 7 - LAVWMA FY 2026 monthly expenditure for labor, accounts payable (A/P), and overall (O&M); cost per export flow (million gallons [MG] and acre-foot [AF]) provided for reference; quarterly and YTD summaries provided below monthly values; note totals (quarterly & YTD) provided in with monthly summary

	Labor Expenses	A/P Expenses	O&M Expenses	\$/MG	\$/AF
Q1	\$348,034	\$330,304	\$678,338	\$1,074	\$350
Jul-2025	\$105,587	\$131,282	\$236,868	\$1,482	\$483
Aug-2025	\$137,544	\$119,487	\$257,030	\$1,340	\$437
Sep-2025	\$104,903	\$79,536	\$184,439	\$659	\$215
Q2	\$270,067	\$584,979	\$855,046	\$635	\$207
Oct-2025	\$92,748	\$210,781	\$303,529	\$760	\$248
Nov-2025	\$97,745	\$165,357	\$263,102	\$577	\$188
Dec-2025	\$79,574	\$208,841	\$288,414	\$588	\$192
Q3	\$376,666	\$602,427	\$979,093	\$675	\$220
Jan-2026	\$108,236	\$272,509	\$380,744	\$699	\$228
Feb-2026	\$106,775	\$199,228	\$306,003	\$617	\$201
Mar-2026	\$161,655	\$130,691	\$292,346	\$713	\$232
Q4	\$300,345	\$550,417	\$850,763	\$915	\$298
Apr-2026	\$78,792	\$104,530	\$183,322	\$463	\$151
May-2026	\$142,580	\$112,618	\$255,197	\$798	\$260
Jun-2026	\$78,974	\$333,270	\$412,243	\$1,924	\$627
Total	\$1,295,112	\$2,068,127	\$3,363,239	\$772	\$251
Q4					
Average	\$100,115	\$183,472	\$283,588	\$1,061	\$346
Minimum	\$78,792	\$104,530	\$183,322	\$463	\$151
Maximum	\$142,580	\$333,270	\$412,243	\$1,924	\$627
YTD					
Average	\$107,926	\$172,344	\$280,270	\$885	\$288
Minimum	\$78,792	\$79,536	\$183,322	\$463	\$151
Maximum	\$161,655	\$333,270	\$412,243	\$1,924	\$627

Table 8 - LAVWMA FY 2026 YTD expenditures (O&M & labor) with percent budget utilized and budget remaining

	O&M YTD Expenses	O&M Budget Utilization	O&M Budget Remaining	Labor YTD Expenses	Labor Budget Utilization	Labor Budget Remaining
Q1						
Jul-2025	\$236,868	6.6%	\$3,363,867	\$105,587	8.5%	\$1,143,713
Aug-2025	\$493,899	13.7%	\$3,106,836	\$243,131	19.5%	\$1,006,169
Sep-2025	\$678,338	18.8%	\$2,922,397	\$348,034	27.9%	\$901,266
Q2						
Oct-2025	\$981,867	27.3%	\$2,618,868	\$440,782	35.3%	\$808,518
Nov-2025	\$1,244,969	34.6%	\$2,355,766	\$538,527	43.1%	\$710,773
Dec-2025	\$1,533,383	42.6%	\$2,067,352	\$618,101	49.5%	\$631,199
Q3						
Jan-2026	\$1,914,128	53.2%	\$1,686,607	\$726,336	58.1%	\$522,964
Feb-2026	\$2,220,131	61.7%	\$1,380,604	\$833,111	66.7%	\$416,189
Mar-2026	\$2,512,477	69.8%	\$1,088,258	\$994,767	79.6%	\$254,533
Q4						
Apr-2026	\$2,695,798	74.9%	\$904,937	\$1,073,559	85.9%	\$175,741
May-2026	\$2,950,996	82.0%	\$649,739	\$1,216,138	97.3%	\$33,162
Jun-2026	\$3,363,239	93.4%	\$237,496	\$1,295,112	103.7%	(\$45,812)

Table 9 - LAVWMA FY 2026 billed labor hours and full-time employment equivalent; quarterly and YTD summaries provided below monthly values; note billed labor hour totals (quarterly & YTD) provided with monthly summary

	Billed Labor Hours	FTE Equivalent
Q1	1,526.3	
Jul-2025	465.5	2.7
Aug-2025	607.8	3.5
Sep-2025	453.0	2.6
Q2	1,195.3	
Oct-2025	409.5	2.4
Nov-2025	433.0	2.5
Dec-2025	352.8	2.0
Q3	1,656.0	
Jan-2026	479.5	2.8
Feb-2026	476.5	2.7
Mar-2026	700.0	4.0
Q4	1,321.3	
Apr-2026	340.8	2.0
May-2026	640.0	3.7
Jun-2026	340.5	2.0
Total	5,698.8	
Q4		
Average	440.4	2.5
Minimum	340.5	2.0
Maximum	640.0	3.7
YTD		
Average	474.9	2.7
Minimum	340.5	2.0
Maximum	700.0	4.0

Expenditures: Livermore Sole Use Facilities

Table 10 - LAVWMA FY 2026 expenditures (labor & accounts payable [A/P])
for Livermore sole use facilities; quarterly and YTD (Total) summaries provided
below monthly values

Expenses	Labor	A/P	Total
Q1			
Jul-2025	\$410	\$1,556	\$1,966
Aug-2025	\$0	\$670	\$670
Sep-2025	\$0	\$756	\$756
Q2			
Oct-2025	\$0	\$0	\$0
Nov-2025	\$0	\$588	\$588
Dec-2025	\$0	\$816	\$816
Q3			
Jan-2026	\$1,640	\$749	\$2,389
Feb-2026	\$820	\$761	\$1,581
Mar-2026	\$0	\$792	\$792
Q4			
Apr-2026	\$0	\$259	\$259
May-2026	\$0	\$675	\$675
Jun-2026	\$0	\$1,605	\$1,605
	Labor	A/P	Total
Q1			
Total	\$410	\$2,982	\$3,392
Average	\$137	\$994	\$1,131
Minimum	\$0	\$670	\$670
Maximum	\$410	\$1,556	\$1,966
Q2			
Total	\$0	\$1,405	\$1,405
Average	\$0	\$468	\$468
Minimum	\$0	\$0	\$0
Maximum	\$0	\$816	\$816
Q3			
Total	\$2,460	\$2,301	\$4,762
Average	\$820	\$767	\$1,587
Minimum	\$0	\$749	\$792
Maximum	\$1,640	\$792	\$2,389
Q4			
Total	\$0	\$2,540	\$2,540
Average	\$0	\$847	\$847
Minimum	\$0	\$259	\$259
Maximum	\$0	\$1,605	\$1,605
Total Total	\$2,871	\$9,228	\$12,099
Total Average	\$239	\$769	\$1,008
Total Minimum	\$0	\$0	\$0
Total Maximum	\$1,640	\$1,605	\$2,389

Detailed YTD O&M Budget Comparison to Actual Expenses

	LAVWMA																	
	BUDGET COMPARISON TO ACTUAL EXPENSES: GOODS & SERVICES																	
																Current FY Period:		12
	ACTUAL EXPENSES BILLED TO LAVWMA FOR REGULAR O&M																	
		Budget	July	August	September	October	November	December	January	February	March	April	May	June	YTD	YTD		
		FY 2025-2026	2025	2025	2025	2025	2025	2025	2026	2026	2026	2026	2026	2026	TOTAL	Budget		
Project Total: lavcost LAVWMA	Labor																	
	Staff	\$1,249,300	\$105,587	\$137,544	\$104,903	\$92,748	\$97,745	\$79,574	\$108,236	\$106,775	\$161,655	\$78,792	\$142,580	\$78,974	\$1,295,112	\$1,249,300		
	Subtotal	\$1,249,300	\$105,587	\$137,544	\$104,903	\$92,748	\$97,745	\$79,574	\$108,236	\$106,775	\$161,655	\$78,792	\$142,580	\$78,974	\$1,295,112	\$1,249,300		
Phase Total: supply	Materials & Supplies																	
	Operations Supplies	\$24,100	130	\$466	\$671	\$156	\$3,027	\$258	\$79	\$352	\$216	\$134	\$331	\$88	\$5,907	\$24,100		
	Mechanical Supplies	\$35,250	\$1,080	\$1,859	\$17		\$303	\$129	\$1,044	\$371	\$248	\$1,972	\$1,902	\$5,539	\$14,464	\$35,250		
	Electrical Supplies	\$40,000	\$0	\$0	\$0	\$10,429		\$9,211	\$8,959	\$1,670	\$4,327	\$2,304	\$67	\$110	\$37,077	\$40,000		
	Subtotal	\$99,350	\$1,210	\$2,325	\$689	\$10,585	\$3,330	\$9,598	\$10,082	\$2,392	\$4,791	\$4,410	\$2,300	\$5,737	\$57,448	\$99,350		
Langelier Index	Compliance Testing	\$12,000	\$1,465	\$1,172	\$1,172	\$1,465	\$1,172	\$1,465	\$1,200	\$1,200	\$1,200	\$1,323	\$1,200	\$1,200		\$12,000		
	Operational Support Testing	\$5,050	\$321	\$0	\$0	\$642	\$0	\$0	\$658	\$0	\$0	\$658	\$0	\$0		\$5,050		
	Special Sampling	\$30,300	\$2,541	\$2,340	\$2,925	\$2,340	\$1,938	\$2,541	\$2,398	\$2,398	\$2,998	\$2,192	\$2,398	\$2,398		\$30,300		
	Subtotal	\$47,350	\$4,327	\$3,512	\$4,097	\$4,447	\$3,110	\$4,006	\$4,256	\$3,598	\$4,198	\$4,173	\$3,598	\$3,598	\$46,920	\$47,350		
Phase Total: nonroutine	Sub-surface Repairs	\$16,225													\$0	\$16,225		
	Street Sweeping	\$5,150													\$0	\$5,150		
	Cathodic Protection Survey & Repairs	\$48,700													\$0	\$48,700		
	Underground Service Alert	\$5,200	\$626												\$626	\$5,200		
	SCADA software maintenance contract	\$15,000	\$5,365					\$158							\$5,523	\$15,000		
	Remote monitoring annual service for PS and Re	\$2,500						\$646							\$646	\$2,500		
	HVAC Maintenance/Repairs	\$1,200													\$0	\$1,200		
	Termite/Pest Control	\$1,100													\$0	\$1,100		
	Landscape/weed maintenance	\$11,550										\$8,896		\$2,965	\$11,862	\$11,550		
	Smartmeter Covers	\$1,860									\$2,184				\$1,860	\$1,860		
	Janitorial Service	\$11,700		\$1,950	\$975		\$975	\$975	\$975	\$975	\$3,200		\$975	\$1,950	\$12,950	\$11,700		
	Fire Extinguisher Maintenance	\$200													\$0	\$200		
	Misc Professional/Contractual Services	\$34,000		\$457		\$280		\$317			\$2,456	\$3,077	\$356	\$-1,627	\$5,315	\$34,000		
	Subtotal	\$154,385	\$5,991	\$2,407	\$975	\$280	\$975	\$2,095	\$975	\$975	\$7,840	\$11,973	\$1,331	\$3,288	\$39,106	\$154,385		
Phase Total: utilities	Utilities																	
	Electricity (PG&E)	\$2,019,250	\$119,608	\$110,922	\$72,900	\$195,364	\$157,362	\$192,838	\$256,629	\$192,112	\$113,104	\$83,824	\$104,638	\$319,959	\$1,919,261	\$2,019,250		
	Water & Sewer (Pleasanton)	\$2,500			\$202		\$202		\$196		\$380		\$380	\$386	\$1,746	\$2,500		
	Water (EBMUD)	\$1,600			\$483		\$228		\$219		\$228		\$219		\$1,377	\$1,600		
	Telephone/communications	\$2,000	\$146	\$321	\$190	\$104	\$151	\$303	\$152	\$151	\$151	\$151	\$151	\$301	\$2,270	\$2,000		
	WW Treatment (DSRSD)	\$0													\$0	\$0		
	Subtotal	\$2,025,350	\$119,754	\$111,243	\$73,775	\$195,469	\$157,942	\$193,141	\$257,196	\$192,263	\$113,862	\$83,974	\$105,389	\$320,646	\$1,924,654	\$2,025,350		
Phase Total: nonroutine	Non-Routine																	
		\$25,000													\$0	\$25,000		
	Subtotal	\$25,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$25,000		
	Monthly Total		\$236,868	\$257,030	\$184,439	\$303,529	\$263,102	\$288,414	\$380,744	\$306,003	\$292,346	\$183,322	\$255,197	\$412,243	\$3,363,239	\$3,600,735		
	YTD Total	\$3,600,735	\$236,868	\$493,899	\$678,338	\$981,867	\$1,244,969	\$1,533,383	\$1,914,128	\$2,220,131	\$2,512,477	\$2,695,798	\$2,950,996	\$3,363,239				
	Combined Export Flow, mg	4520	160	192	280	399	456	490	545	496	410	396	320	214	4,358	4,520		
	Pumping Efficiency		70.6%	71.5%	74.0%	75.1%	73.6%	72.8%	72.6%	72.0%	72.0%	72.0%	72.1%	71.1%				
	Monthly Cost, \$/mg		\$1,482	\$1,340	\$659	\$760	\$577	\$588	\$699	\$617	\$713	\$463	\$798	\$1,924				
	YTD Running Cost, \$/mg	\$797	\$1,482	\$1,405	\$1,074	\$953	\$837	\$776	\$759	\$736	\$733	\$705	\$712	\$772	\$772			

LAVWMA															
BUDGET COMPARISON TO ACTUAL EXPENSES: LABOR															
													Current FY Period:		12
ACTUAL EXPENSES BILLED TO LAVWMA FOR REGULAR O&M															
		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	YTD	YTD
	FY 2025-2026	2025	2025	2025	2025	2025	2025	2026	2026	2026	2026	2026	2026	TOTAL	Budget
Estimated Personnel Hours															
Division 51 - FOD	44	-	10.00	-	5.00	10.00	-	-	17.00	14.00	-	11.00	-	67.00	44.00
Water/Wastewater Sys Lead Op	0													-	-
Water/Wastewater Sys OP IV-On Call	0													-	-
Water/Wastewater Sys OP IV	0								2.00					2.00	-
Water/Wastewater Sys OP III	0													-	-
Water/Wastewater Sys OP I/II	36		10.00		5.00	10.00			17.00	8.00		11.00		61.00	36.00
Maintenance Worker	0													-	-
Supervisor	8								4.00					4.00	8.00
Division 52 - WWTP	2,605	218.50	367.75	272.00	185.00	225.00	175.00	220.00	240.50	307.00	188.25	194.00	186.00	2,779.00	2,405.00
Senior Process WWTP Operator	40	32.00	74.50	30.00	15.00	30.00	28.00	28.00	26.00	46.00	30.00	34.50	30.00	404.00	40.00
Senior WWTP Operator	1,950	61.00	80.75	51.00	49.50	49.00	35.50	44.00	52.50	151.00	46.50	38.00	35.00	693.75	1,950.00
WWTP Supervisor	200	10.00	17.00	39.00	18.00	20.00	9.00	14.00	10.00	10.00	9.50	7.00	17.50	181.00	-
Operator In Training	0													-	-
WWTP Operator II	415	115.50	194.50	151.00	102.50	126.00	102.50	134.00	152.00	100.00	102.25	114.50	103.50	1,498.25	415.00
WWTP Operator II (SLSS)	0													-	-
Operations Superintendent	0		1.00	1.00										2.00	-
Operations Director	0													-	-
Division 53 - MECH	1,580	188.00	159.00	129.00	154.00	148.50	135.75	202.50	131.50	199.50	113.50	122.00	115.50	1,798.75	1,580.00
Senior Mechanic	500	68.00	51.00	52.00	49.00	22.50	30.25	43.00	31.50	67.00	45.00	33.00	56.00	548.25	500.00
Senior Mechanic - USA	0	17.00	10.00	23.00	9.00	16.00	16.00	13.50	16.00	54.00	46.00	40.00	10.00	270.50	-
Maintenance Worker II	40													-	40.00
Mechanic I	0	19.50	35.50	25.50	56.00	56.50	36.00	70.00	69.00	26.50				394.50	-
Mechanic II	1,000	17.00	33.00	8.00	21.00	27.50	16.00	41.00	6.00	25.00	11.50	18.00	18.50	242.50	1,000.00
Mechanic I- USA	0	57.50	21.50	5.50	19.00	15.00	18.50	22.00	9.00	16.00			11.50	195.50	-
Mechanic II- USA	0	9.00	8.00	15.00		11.00	19.00	13.00		11.00	11.00	31.00	19.50	147.50	-
Mechanical Supervisor	40													-	40.00
Mechanical Superintendent	0													-	-
Division 54 - ELEC	1,079	57.00	67.00	48.00	64.50	46.00	40.50	56.50	87.50	178.50	39.00	313.00	39.00	1,036.50	1,079.00
Senior Instrument/Controls Tech	90	9.00	14.50	7.00	12.50	12.00	6.00	11.50	16.00	15.00	13.50	9.00	14.00	140.00	90.00
Instrumentation & Controls Tech I/II	504	19.00	24.00	21.00	20.00	18.00	29.50	33.00	22.50	36.00	21.00	22.00	18.50	284.50	504.00
Ice Supervisor	45	0.50	7.00	4.00	0.50	4.00	1.00	3.00	3.00	2.00		10.00	3.00	38.00	45.00
Senior Electrician	90	9.00	10.00	6.00	18.00			7.00	12.00	24.00	3.00	48.00	2.00	139.00	90.00
Electrician I/II	305	15.00	10.00	9.00	10.00	10	2.00	2.00	21.00	97.00		218.00		394.00	305.00
Principal Electrical Engineer	45	4.50	1.50	1.00	3.50	2.00	2.00		13.00	4.50	1.50	6.00	1.50	41.00	45.00
Division 55 - Laboratory	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EC Inspector II-Pretreatment	0													-	-
Laboratory Technician	0													-	-
Supervisor	0													-	-
Division 26 - SAFETY	54	-	-	-	-	-	-	-	-	-	-	-	-	-	54.00
Safety Officer	54	-	-	-	-	-	-	-	-	-	-	-	-	-	54.00
Division 40 - ENG	118	2.00	4.00	4.00	1.00	3.50	1.50	0.50	-	1.00	-	-	-	17.50	108.00
Senior Civil Engineer-SME	10													-	-
Associate Engineer	60	2.00	4.00	4.00	1.00	3.50	1.50	0.50						16.50	60.00
Construction Inspector I/II	8													-	8.00
Engineering Technician I	20								1.00					1.00	20.00
GIS Analyst	20													-	20.00
Total Estimated Personnel Hours	5,480														
FTE	2.6														
Total Monthly Hours		465.50	607.75	453.00	409.50	433.00	352.75	479.50	476.50	700.00	340.75	640.00	340.50	5,698.75	5,270.00
Notes:															
May: 640 Total billed															
249 reclassified from CIP to LAVCOST															

EBDA Monthly Reports

Parameter	Flow	CBOD Qual	CBOD	TSS Qual	TSS	pH	pH	Total Residual Chlorine	Total Residual Chlorine	Fecal Qual	Fecal Coliforms	Entero Qual	Enterococci	Total Kjeldahl Nitrogen	Total Inorganic Nitrogen	Total Inorganic Nitrogen	Flow	Flow	Total Residual Chlorine
Units	MGD		mg/L		mg/L	SU	SU	mg/L	mg/L		MPN/100mL		MPN/100mL	mg/L	mg/L	mg/L	MGD	MGD	mg/L
Test Method	Daily Average (Mean)		SM 5210 B 2011		SM 2540 D 2011	Instant Min	Instant Max	Daily Average (Mean)	Daily Average (Mean)		SM 9221 C,E 2006		Enterolert	SM 4500-N	Calculation: NO2 + NO3		Daily Average	Daily Average Field	
MDL			2.0		1.2														
RL			2.0		4.5						1.8		10						
Location	LAVWMA-EXP		LAVWMA-EXP		LAVWMA-EXP	LAVWMA-EXP	LAVWMA-EXP	LAVWMA-EXP	SLSS		SLSS		SLSS	INF 002F	EFF 002F	EFF 002F	INF 002F	EFF 002F	SLSS
4/1/2026	11.17		<2		6.2	7.53	7.71	3.41									11.79	5.30	
4/2/2026	11.12					7.25	7.70	4.33						52	32		11.99	6.80	
4/3/2026	12.59					7.25	7.41	4.45									11.62	6.60	
4/4/2026	11.45					7.24	7.43	4.45									11.62	10.82	
4/5/2026	13.85					7.25	7.37	3.34									11.26	7.56	
4/6/2026	10.58					7.15	7.38	2.93									11.13	6.78	
4/7/2026	10.75					7.27	7.63	2.71			7.8	<	10				10.87	4.31	0.04
4/8/2026	11.70		4.5		6.9	7.27	7.46	2.94									10.52	9.26	
4/9/2026	9.03					7.25	7.38	3.25									10.95	2.87	
4/10/2026	10.76					7.27	7.41	2.51									11.39	7.97	
4/11/2026	12.90					7.24	7.37	2.45									13.11	10.60	
4/12/2026	12.26					7.17	7.33	2.53									14.83	14.17	
4/13/2026	14.84					7.21	7.65	2.42									14.13	6.29	
4/14/2026	14.80					7.25	7.30	2.45		<	1.8	<	10				12.50	11.72	0.04
4/15/2026	14.82		2.6		4.1	7.25	7.30	3.05									12.55	9.61	
4/16/2026	15.79					7.27	7.32	2.96									12.18	9.57	
4/17/2026	11.63					7.19	7.32	2.46									12.11	8.07	
4/18/2026	11.64					7.19	7.32	3.27									12.03	9.34	
4/19/2026	15.86					7.24	7.29	2.89									12.55	6.53	
4/20/2026	15.87					7.22	7.29	2.43									11.95	11.69	
4/21/2026	15.92					7.19	7.27	3.09		<	1.8	<	10				14.07	9.75	0.05
4/22/2026	15.79		2.9		5.1	7.18	7.23	2.41									13.00	12.24	
4/23/2026	15.84					7.18	7.23	3.29									13.05	12.58	
4/24/2026	11.59					7.13	7.27	3.24									12.69	6.90	
4/25/2026	15.81					7.25	7.28	2.53									12.30	11.68	
4/26/2026	15.90					7.26	7.31	2.89									12.69	9.86	
4/27/2026	14.43					7.25	7.32	2.64									12.55	6.79	
4/28/2026	10.07					7.14	7.32	2.63			2.0						12.09	6.35	0.03
4/29/2026	15.86		2.7		4.5	7.20	7.28	2.58									11.70	10.82	
4/30/2026	11.64					7.10	7.51	2.55									11.84	8.50	
Note:																			
Column G - pH Minimum; online																			
Column H - pH Maximum; online																			

Parameter	Flow	CBOD Qual	CBOD	TSS Qual	TSS	pH	pH	Total Residual Chlorine	Total Residual Chlorine	Fecal Qual	Fecal Coliforms	Entero Qual	Enterococci	Total Kjeldahl Nitrogen	Total Inorganic Nitrogen	Total Inorganic Nitrogen	Flow	Flow	Total Residual Chlorine
Units	MGD		mg/L		mg/L	SU	SU	mg/L	mg/L		MPN/100mL		MPN/100mL	mg/L	mg/L	mg/L	MGD	MGD	mg/L
Test Method	Daily Average (Mean)		SM 5210 B 2011		SM 2540 D 2011	Instant Min	Instant Max	Daily Average (Mean)	Daily Average (Mean)	SM 9221 C,E 2006			Enterolert	SM 4500-N	Calculation: NO2 + NO3		Daily Average	Daily Average	Field
MDL			2.0		1.2														
RL			2.0		4.5						1.8		10						
Location	LAVWMA-EXP		LAVWMA-EXP		LAVWMA-EXP	LAVWMA-EXP	LAVWMA-EXP	LAVWMA-EXP	SLSS		SLSS		SLSS	INF 002F	EFF 002F	EFF 002F	INF 002F	EFF 002F	SLSS
5/1/2026	10.64					7.15	7.29	2.45									12.04	5.66	
5/2/2026	11.14					7.17	7.30	2.36									11.91	8.72	
5/3/2026	15.94					7.25	7.29	2.48									12.14	11.32	
5/4/2026	11.62					7.19	7.29	2.54									12.30	5.89	
5/5/2026	11.62					7.21	7.32	2.48		<	1.8	<	10				13.54	10.55	0.05
5/6/2026	12.18		4.5		5.8	7.19	7.30	2.91									11.89	5.65	
5/7/2026	11.69					7.22	7.32	2.61						53	33		11.54	11.05	
5/8/2026	12.04					7.22	7.38	2.43									12.06	4.17	
5/9/2026	11.66					7.24	7.48	2.21									12.29	10.07	
5/10/2026	12.15					7.20	7.33	2.16									12.23	8.74	
5/11/2026	11.62					7.20	7.35	1.83									12.33	4.90	
5/12/2026	11.85					7.25	7.34	1.52			4.5		10				11.64	10.17	0.01
5/13/2026	11.74		7.4		11.0	7.24	7.34	1.77									11.96	1.54	
5/14/2026	7.99					7.10	7.80	1.65								37	11.79	6.18	
5/15/2026	9.05					7.25	7.38	2.50									11.86	3.22	
5/16/2026	9.36					7.27	7.38	2.50									11.64	7.99	
5/17/2026	11.73					7.24	7.34	2.77									12.41	9.23	
5/18/2026	11.72					7.18	7.33	2.29									12.17	5.54	
5/19/2026	7.99					7.13	7.29	2.54			4.5	<	10				12.03	1.61	0.04
5/20/2026	6.79		3.4		8.5	7.15	7.28	3.25									11.99	4.78	
5/21/2026	5.71					7.10	7.27	2.53									12.04	2.04	
5/22/2026	8.39					7.15	7.32	2.23									11.78	3.16	
5/23/2026	7.19					7.20	7.32	2.08									11.70	4.90	
5/24/2026	9.67					7.15	7.30	2.49									11.49	6.88	
5/25/2026	7.75					7.19	7.29	2.65									11.97	5.41	
5/26/2026	11.15					7.24	7.32	2.48			1.8	<	10				11.69	7.22	0.09
5/27/2026	9.13		4.9		7.4	7.15	7.29	3.07									12.05	3.34	
5/28/2026	8.65					6.62	7.72	2.49									12.44	4.85	
5/29/2026	10.26					7.34	7.46	2.95									12.04	6.32	
5/30/2026	9.80					7.33	7.43	3.01									11.98	8.16	
5/31/2026	11.50					7.30	7.41	2.88									12.26	7.82	

Note:

Column G - pH Minimum; online

Column H - pH Maximum; online

Parameter	Flow	CBOD Qual	CBOD	TSS Qual	TSS	pH	pH	Total Residual Chlorine	Total Residual Chlorine	Fecal Qual	Fecal Coliforms	Entero Qual	Enterococci	Total Kjeldahl Nitrogen	Total Inorganic Nitrogen	Total Inorganic Nitrogen	Flow	Flow	Total Residual Chlorine
Units	MGD		mg/L		mg/L	SU	SU	mg/L	mg/L		MPN/100mL		MPN/100mL	mg/L	mg/L	mg/L	MGD	MGD	mg/L
Test Method	Daily Average (Mean)		SM 5210 B 2011		SM 2540 D 2011	Instant Min	Instant Max	Daily Average (Mean)	Daily Average (Mean)	SM 9221 C, E 2006		Enterolert	SM 4500-N	Calculation: NO2 + NO3			Daily Average	Daily Average	Field
MDL			2.0		1.2														
RL			2.0		4.5						1.8		10						
Location	LAVWMA-EXP		LAVWMA-EXP		LAVWMA-EXP	LAVWMA-EXP	LAVWMA-EXP	LAVWMA-EXP	SLSS		SLSS		SLSS	INF 002F	EFF 002F	EFF 002F	INF 002F	EFF 002F	SLSS
6/1/2026	9.19					7.28	7.39	2.67									12.00	4.23	
6/2/2026	8.86					7.30	7.41	2.10			7.8	<	10				11.80	5.30	0.04
6/3/2026	7.65		4		6.6	7.15	7.43	2.32									11.56	3.62	
6/4/2026	7.60					7.24	7.41	2.23						56	33		11.66	2.78	
6/5/2026	5.60					7.20	7.41	2.53									11.75	2.15	
6/6/2026	6.11					7.20	7.42	2.31									11.61	3.73	
6/7/2026	9.17					7.30	7.43	2.14									11.64	6.18	
6/8/2026	8.87					7.29	7.38	2.23									11.82	4.44	
6/9/2026	8.56					7.25	7.36	1.87		<	1.8	<	10				11.58	3.79	0.05
6/10/2026	8.12		4		6.4	7.24	7.82	1.95									11.56	3.84	
6/11/2026	5.96					7.22	7.30	1.71									11.50	3.93	
6/12/2026	8.74					7.22	7.33	0.82									11.68	1.91	
6/13/2026	5.30					7.15	7.32	1.41									11.54	1.55	
6/14/2026	6.63					7.08	7.32	2.05									11.62	5.42	
6/15/2026	7.97					7.17	7.30	2.33									11.81	3.91	
6/16/2026	7.56					7.18	7.33	1.90			6.8		20				11.59	2.70	0.04
6/17/2026	6.03		3.9		8.6	6.85	7.55	1.57									11.62	2.76	
6/18/2026	6.68					7.15	7.29	1.48									11.61	1.51	
6/19/2026	5.82					7.15	7.29	1.70									11.76	2.90	
6/20/2026	7.51					7.19	7.29	1.38									11.55	3.71	
6/21/2026	6.48					7.10	7.29	1.90									11.74	6.10	
6/22/2026	9.16					7.19	7.27	1.84									11.85	2.22	
6/23/2026	6.50					7.19	7.28	1.42			4.5	<	10				11.73	1.65	0.04
6/24/2026	4.84		2.6		6.0	7.01	7.87	0.89									11.88	1.64	
6/25/2026	5.46					7.10	7.34	1.25									11.80	2.68	
6/26/2026	5.45					7.10	7.34	1.27									11.85	1.61	
6/27/2026	6.58					7.10	7.34	1.17									11.82	4.34	
6/28/2026	8.28					7.14	7.32	1.54									12.14	4.06	
6/29/2026	6.97					7.09	7.30	1.47									11.44	3.03	
6/30/2026	6.67					7.12	7.30	1.40			33.0	<	10				11.75	2.52	0.05

Note:

Column G - pH Minimum; online

Column H - pH Maximum; online

Langelier Saturation Index Report (Livermore, DSRSD, LAVWMA)

The Langelier Saturation index is used to predict corrosion potential on the export pipeline. Keeping a Langelier index between -0.5 – 0.5 is a good target.

Langelier pH Saturation Index (Apr-26 through Jun-26)

Agency	Collection Date	TDS (mg/L)	Temp (°C)	Ca Hardness (mg/L CaCO ₃)	Alkalinity (mg/L CaCO ₃)	pH Actual	pH Saturation	Langelier Index
Livermore	06/01/26	558	21.0	72	302	7.7	7.6	0.1
DSRSD	04/07/26	714	22.1	104	311	7.52	7.4	0.2
LAVWMA	04/07/26	674	21.6	92	308	7.54	7.4	0.1

ITEM NO. 11 UPDATE ON LAVWMA ASSET MANAGEMENT PROJECTS

To: LAVWMA Board of Directors
From: Levi Fuller, General Manager
Subject: Update on Asset Management Projects

Action Requested

None at this time. This is an information item only.

Summary

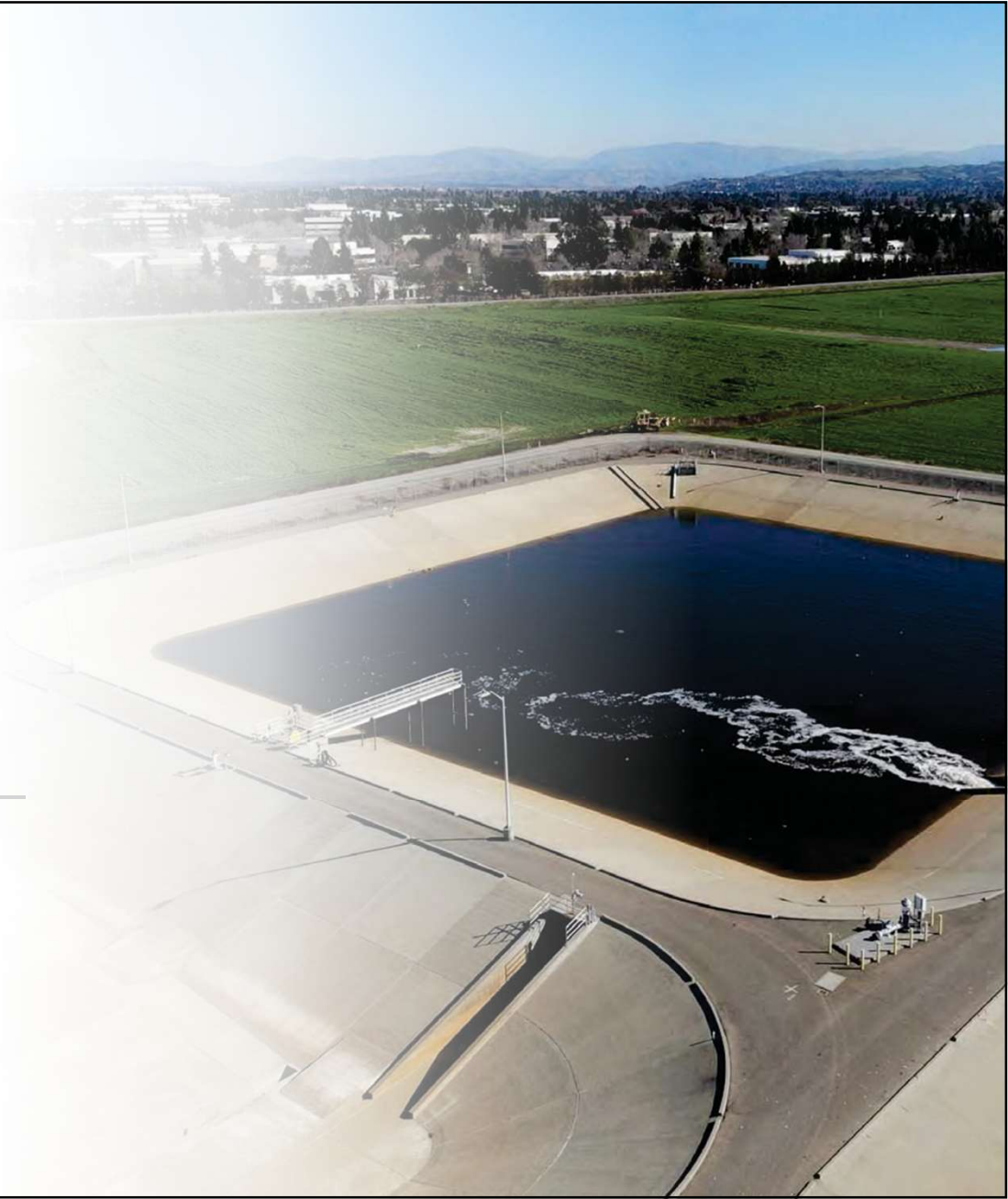
The General Manager will give the Board an update on various projects in LAVWMA's Capital Program including Pumps and Motors, Cathodic Protection, Pipeline CCTV Inspections, and the upgrade to the San Leandro Sample Station.

Recommendation

None at this time. This is an information item only.

Attachments

A. PowerPoint Presentation on Asset Management



LAVWWMA Asset Management Update

LAVWMA Board of Director's
Meeting

August 19, 2026



01 Pipeline Inspection

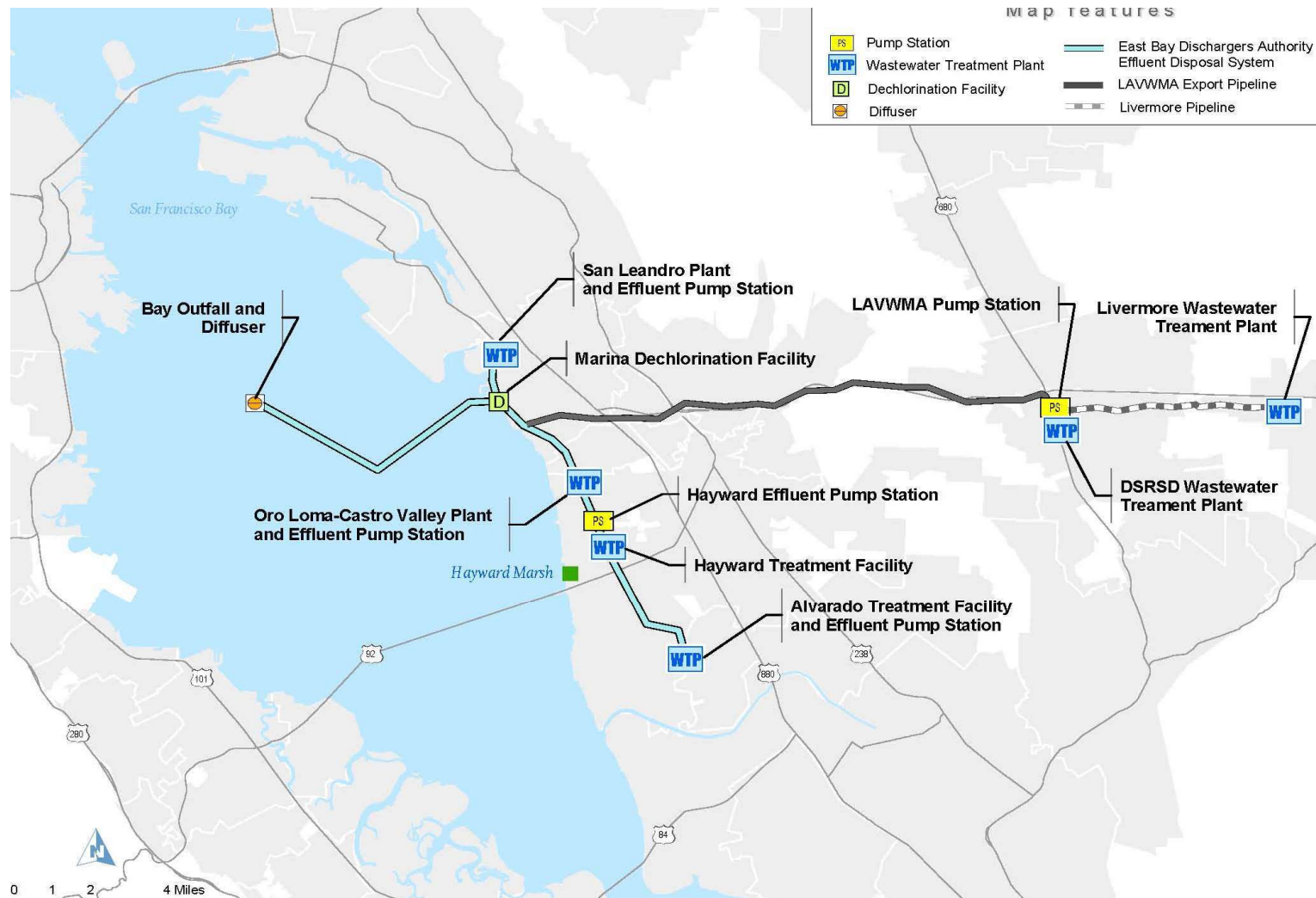
02 Pipeline Cathodic Protection System

03 Pump Station

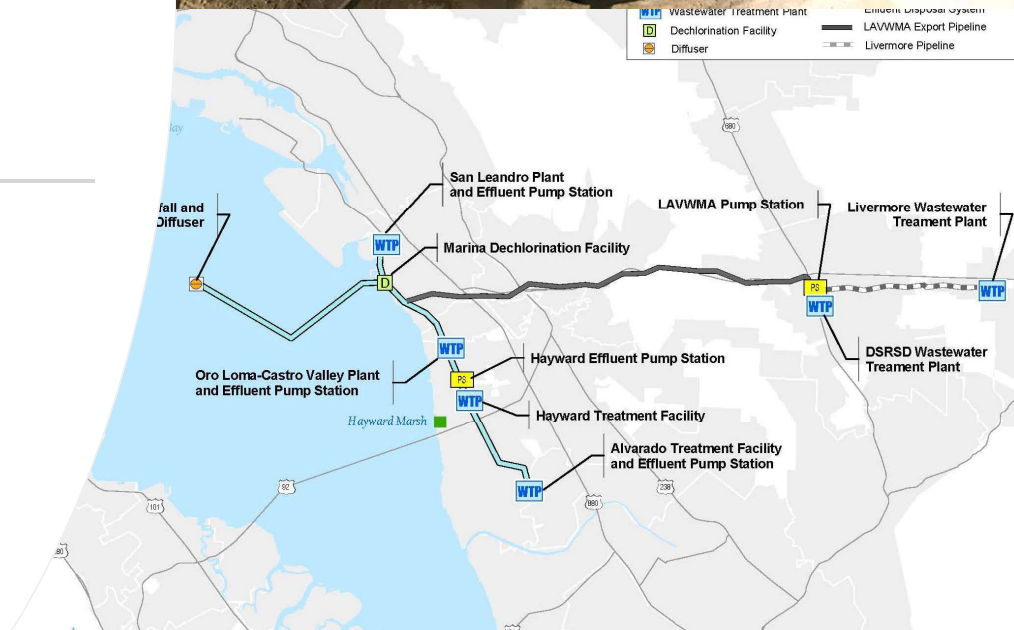
04 San Leandro Sample Station Improvements

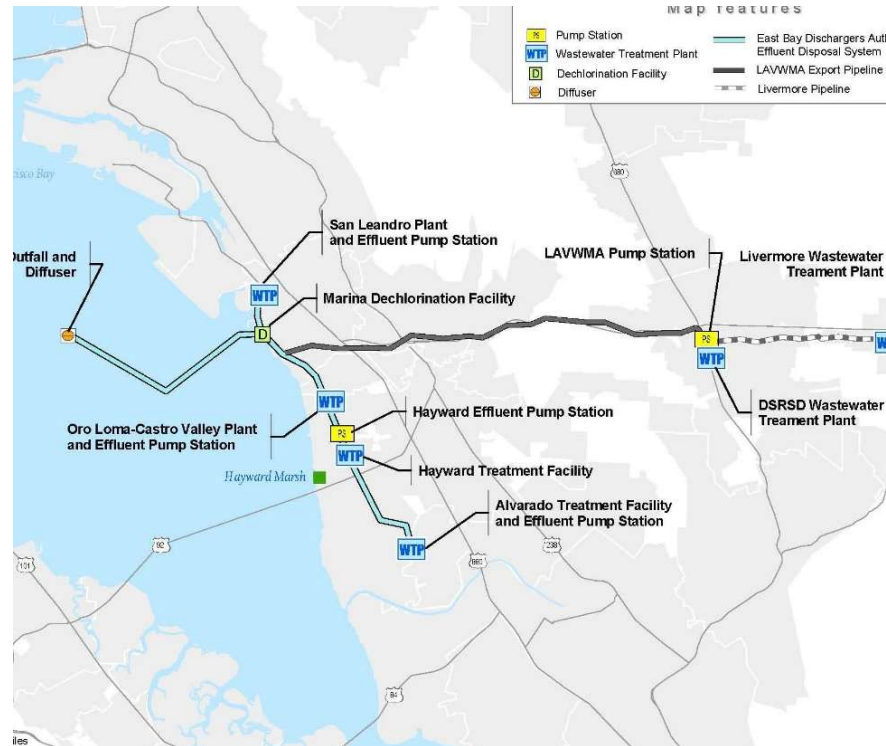
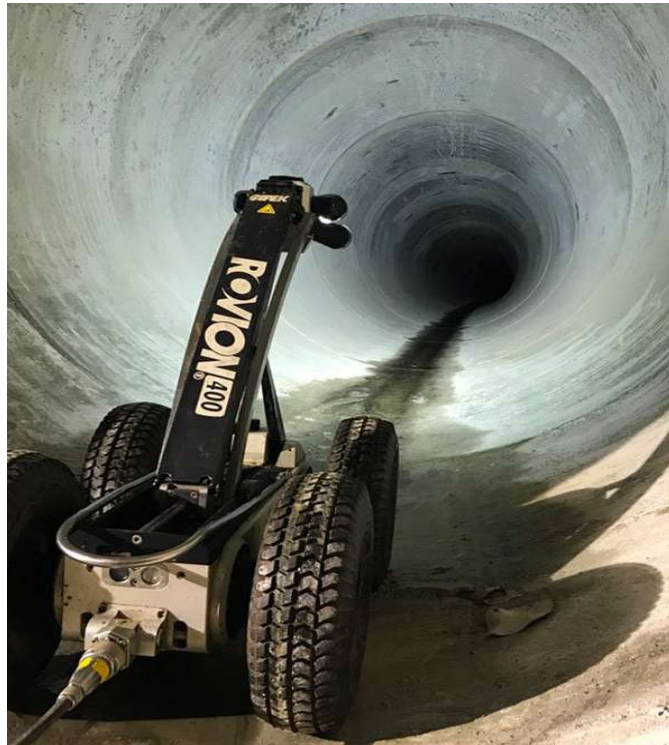
05 LAVWMA Asset Condition Assessment Technical Memorandum

System Map

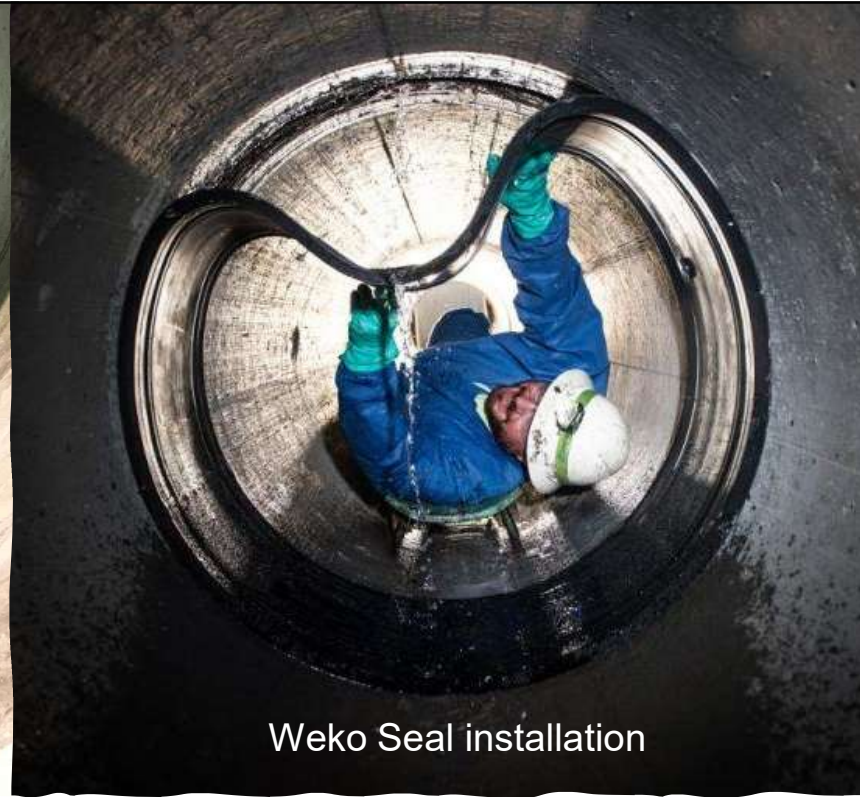


Export Pipeline CCTV Inspection



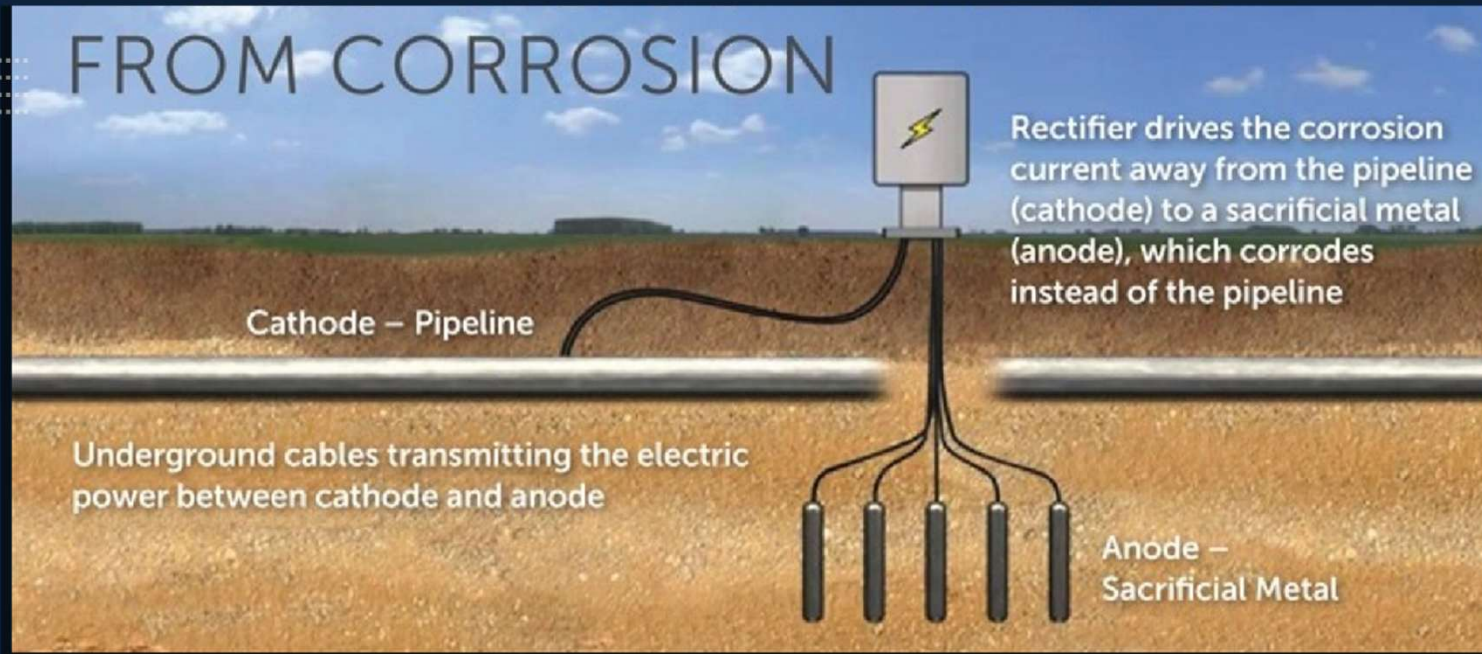


- Consequence, Probability and Criticality failure analysis conduct to select which sections of the ~ 16 miles of pipeline should be inspected.
- CCTV is the standard acceptable method for visually inspecting pipelines to identify defects and construction features.
- PACP (Pipeline Assessment Certification Program) coding is a national standard for identifying structural defects and operational concerns in sewer pipelines.

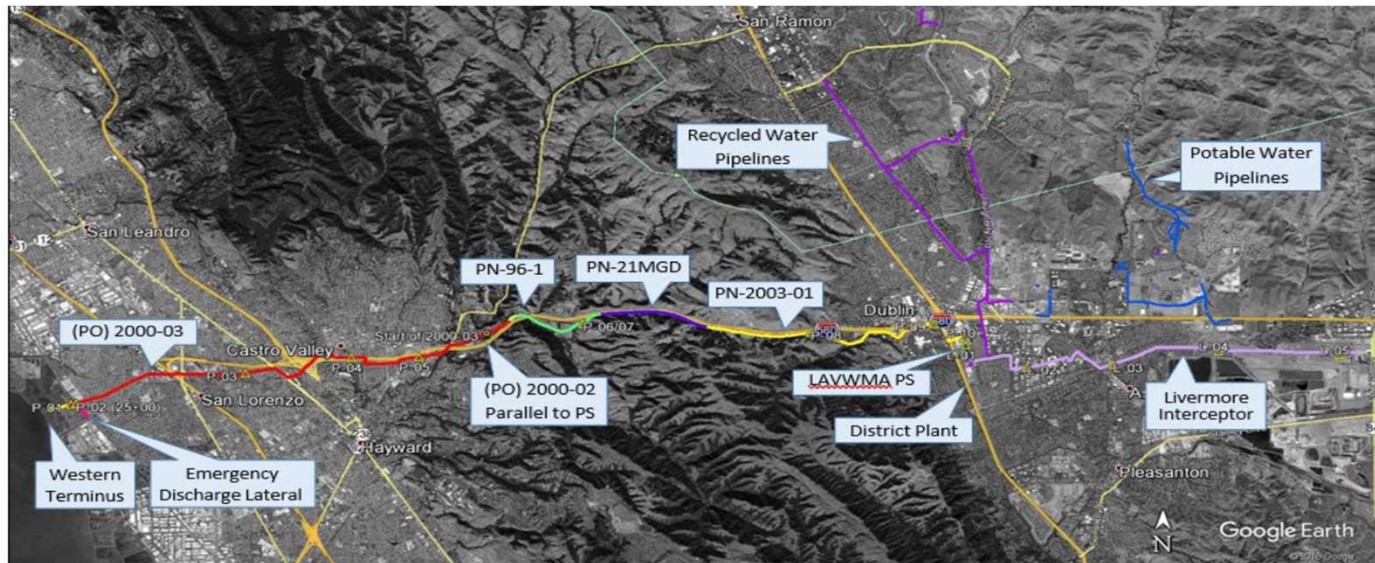


Weko Seal installation

- NPS has completed 56 PACP-coded inspections on the LAVWMA pipeline.
- 2025 – 2026 ~ 30,806 liner ft (or 5.83 miles) of pipe inspected at strategically selected locations along the 16 mile of pipe.
- Installed seven weko seals at 7 locations where the inspection indicated the pipeline needed repair.
- Overall- The LAVWMA pipeline appears to be in good condition.

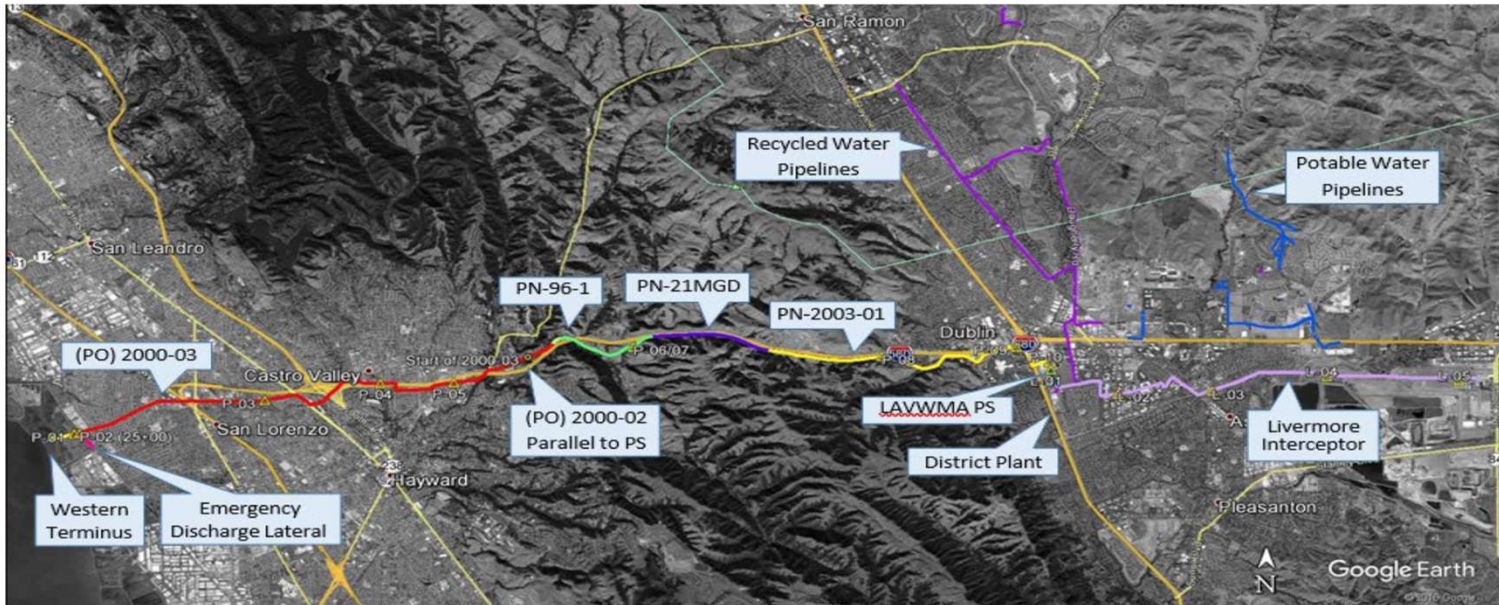


1. Cathodic protection significantly reduces corrosion of the pipeline
2. There are 15 Cathodic Stations along the LAVWMA 16 mile pipeline.
3. Benefits of cathodic protection studies have indicated \$7 saved for every \$1 spent.
4. In 2023 LAVWMA completed a cathodic protection survey
 - a. Overall the cathodic system was determined to be in good condition.
5. System improvements recommended in 2023 that will be completed in 2026.



- Collect baseline pipe-to-soil data at all test station locations for which native data is missing or unusually high.
- Locate and repair electrical discontinuities on the interceptor pipeline
- Locate missing test stations on the Emergency Discharge pipeline at the SLSS
- Install test stations on pipe section 2000-03 at stations 53+00, 65+00, 86+00 and 244+00
- Install remote monitoring units with interrupters on rectifiers
- Replace cathodic protection on 2000-01 casing at Foothill Blvd.

Recommended Pipeline Cathodic Improvements



- *Engineering Specifications completed August 2026*
- *Project will go out to bid in September 2026*
- *Anticipated completion February 2027*

Cathodic Improvements

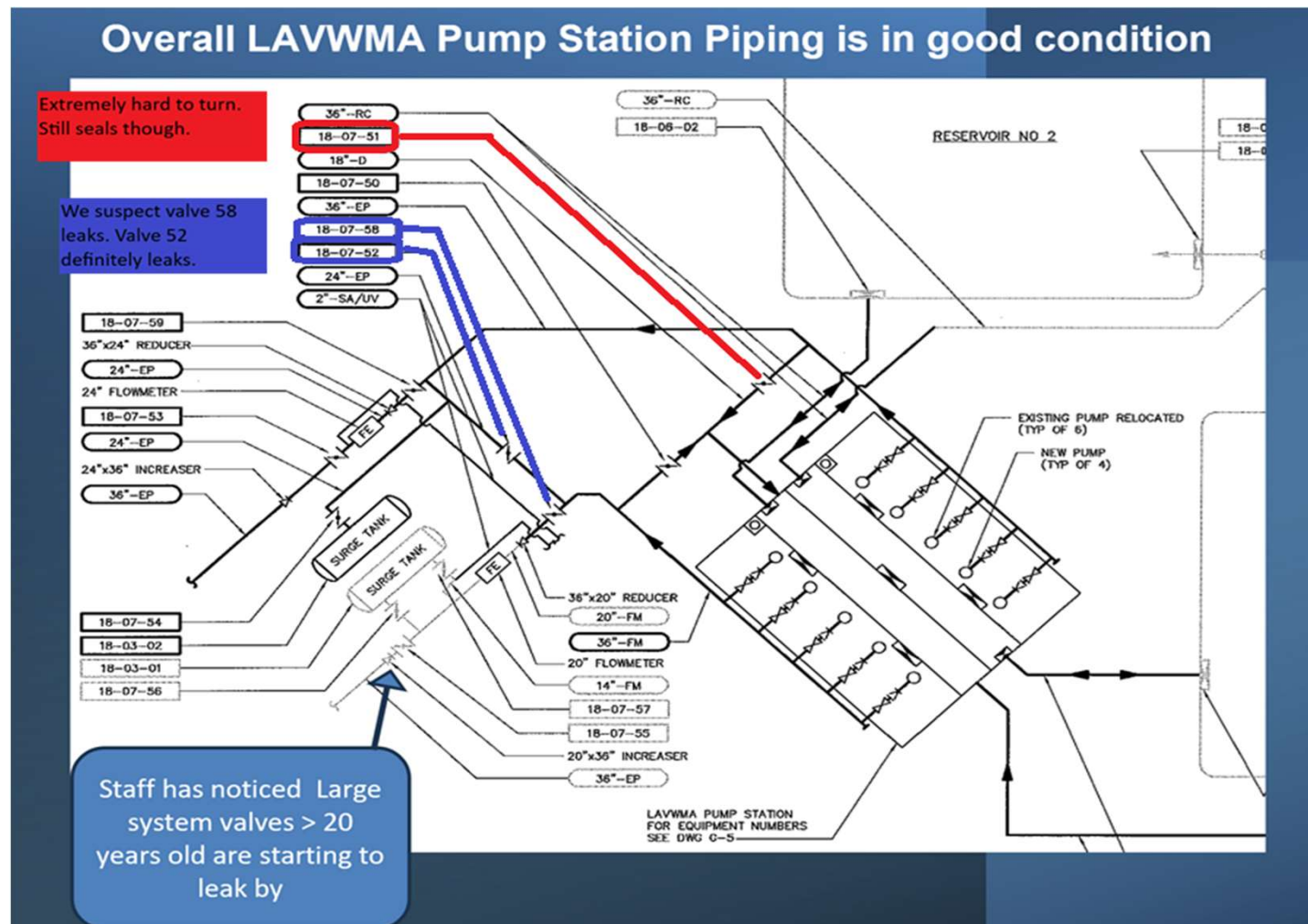
LAVWMA Pump Station



LAVWMA Export Pumps



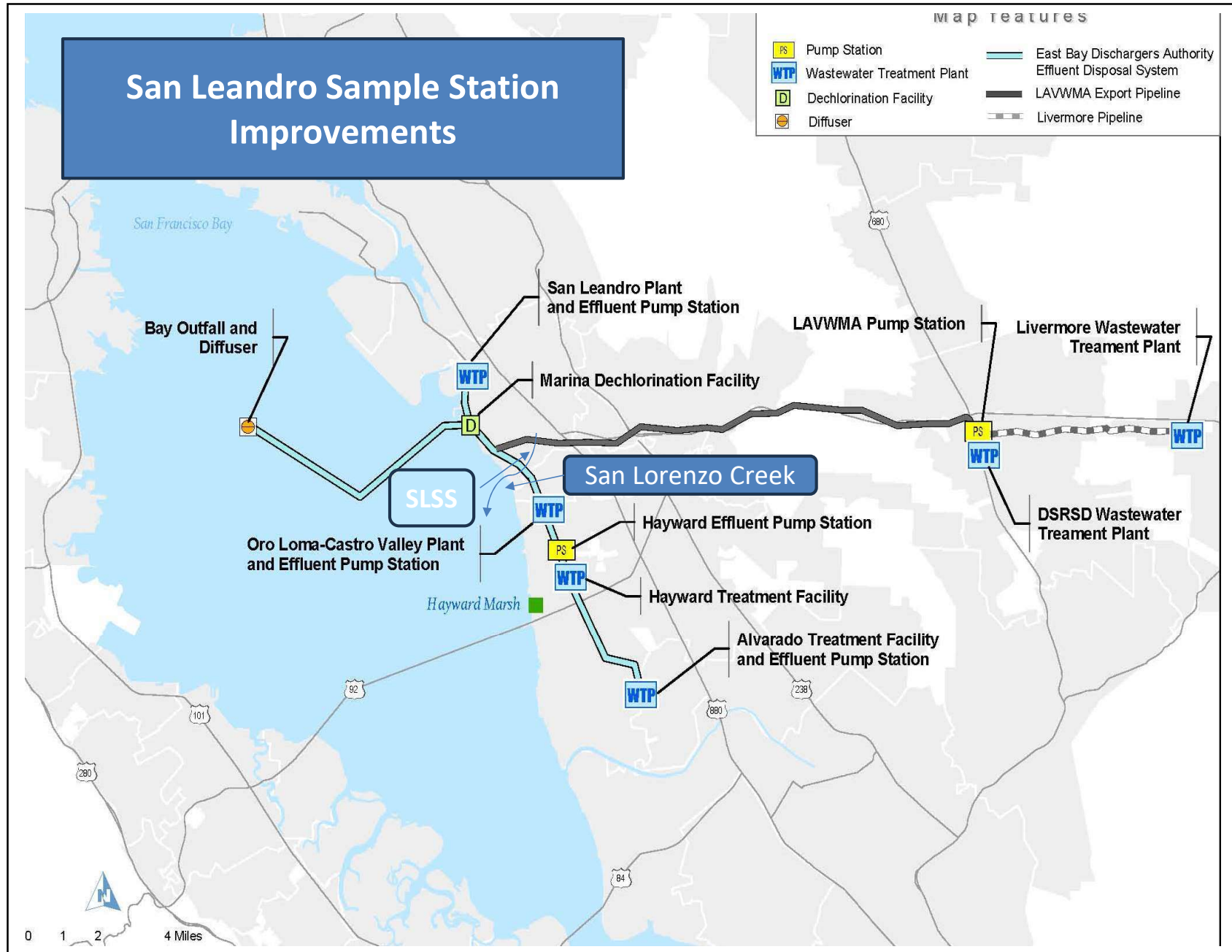
- 10 Export Pumps – 2 pumps and motors overhauled each year
- 43 MGD capacity with one pump out of service
- Overall Export Pumps and Motors are in good condition.



- Valve 52 also needs to be replaced. Last time tested, it was leaking by about 3.2 MGD of flow.
- Staff suspected valve 58 leaks but this needs to be verified
- Valve 51 hard to turn – Requires Two people to operate.



- 17 > 20 year old
- Valve Actuators replaced at the LAVWMA Pump Station

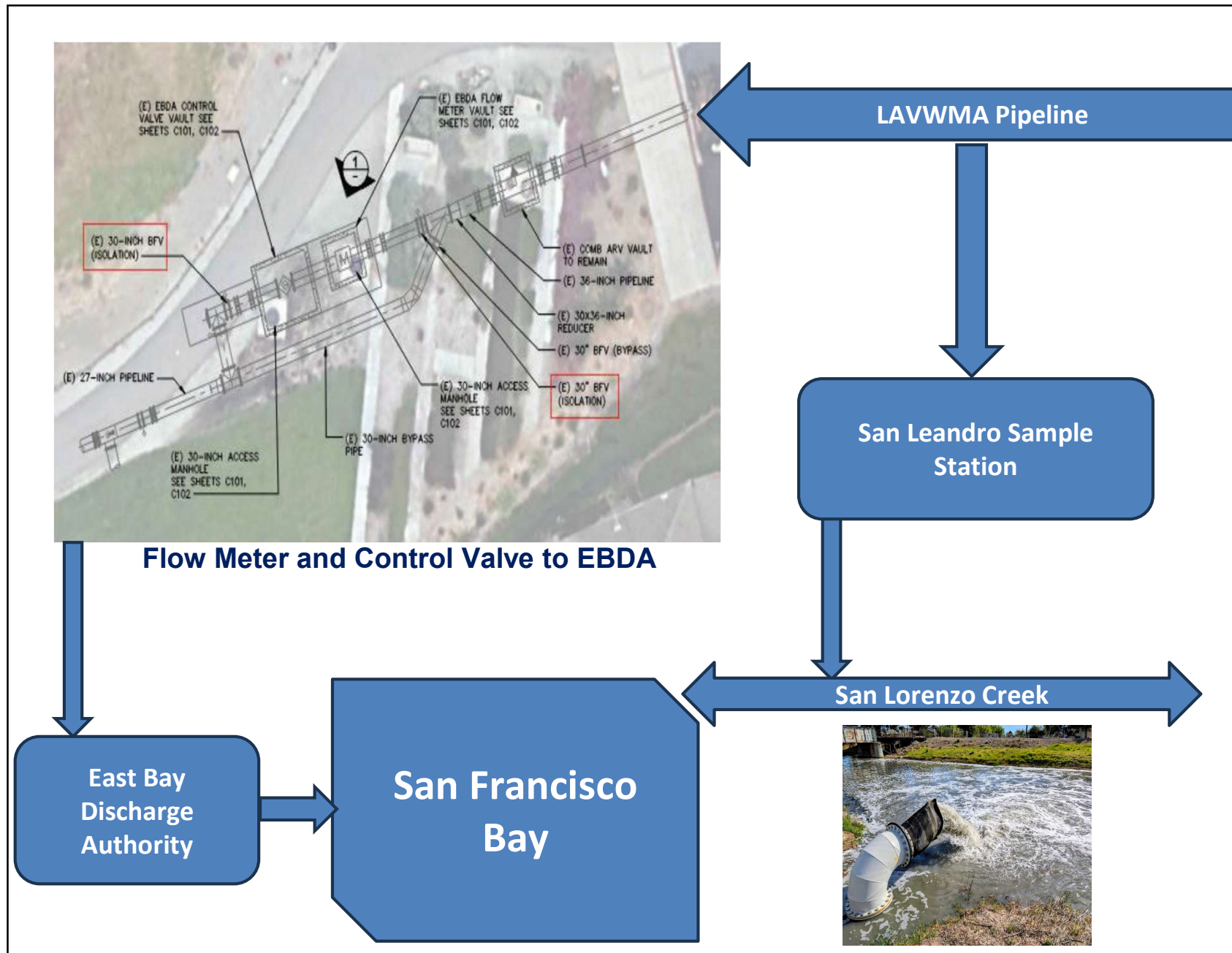


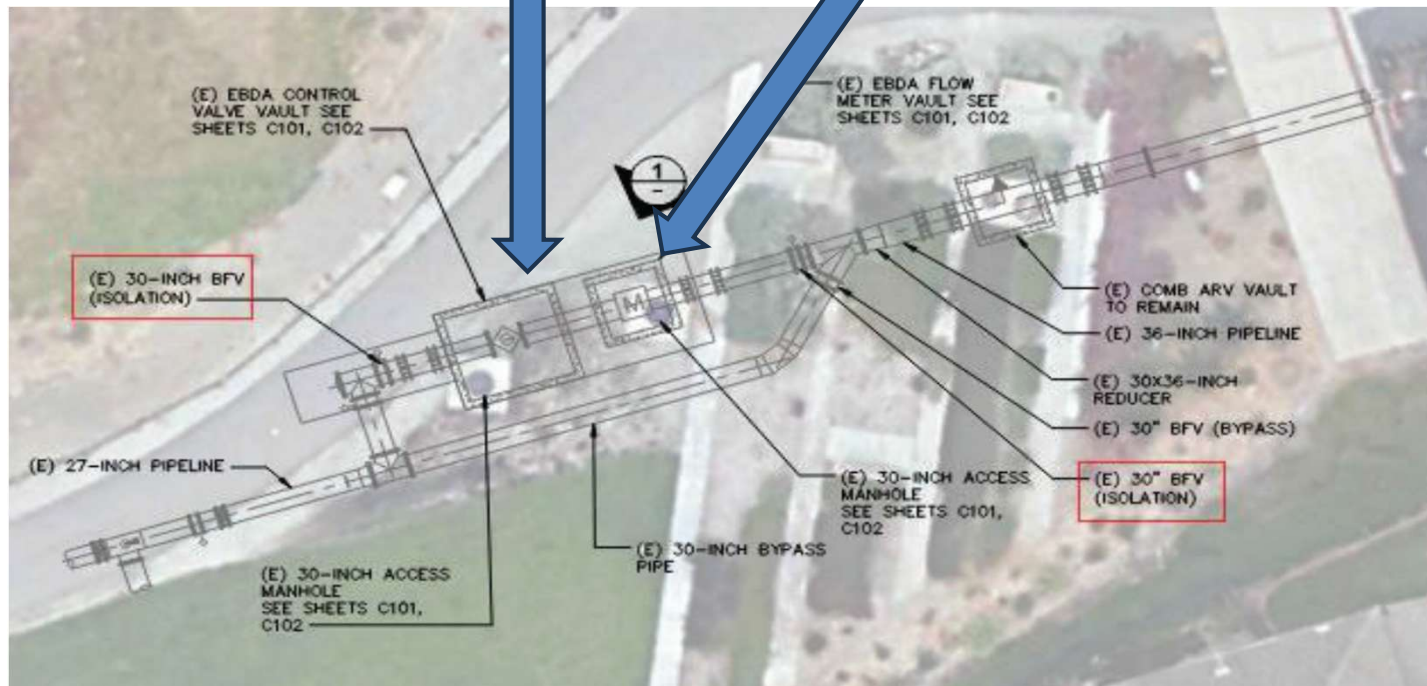


SLSS Old PRVs

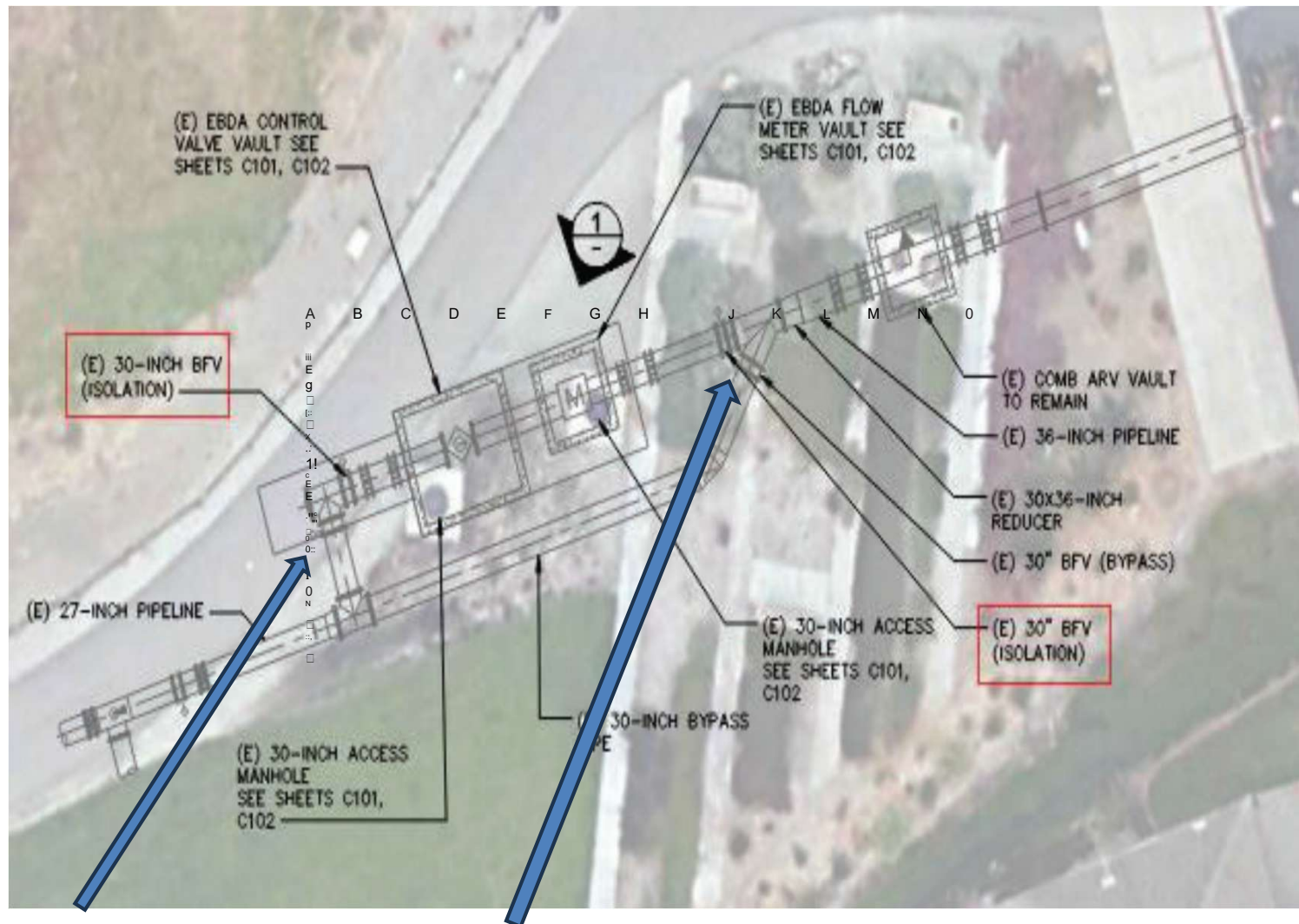
**SLSS New PRV and
Motor control Valve**







Pipeline Dewatering Challenges

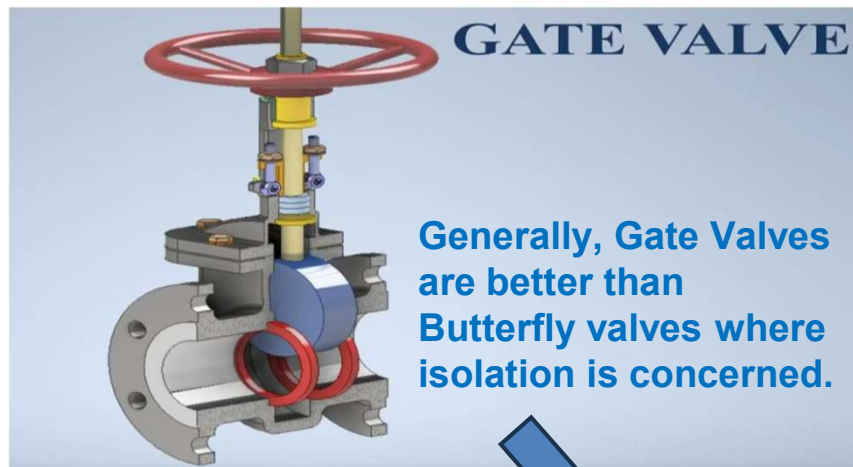


Isolation Valves installed ~ 2004 Failed to Isolate



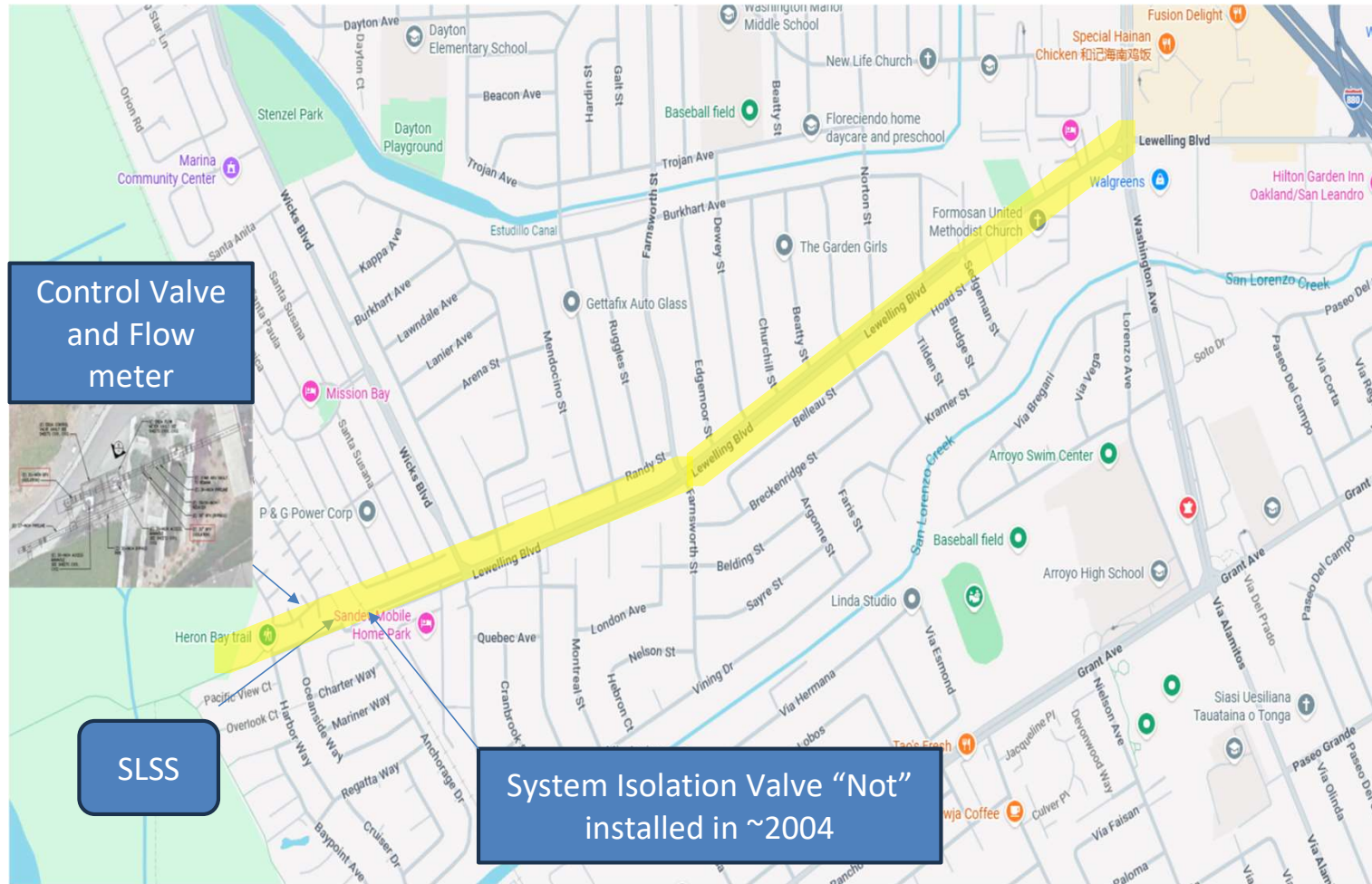
1. Possible reasons for failure of isolation valves.

- a. The valves were installed in 2004 > 22 years old (age).
- b. The valves are buried underground (corrosion).
- c. The valve mechanisms may have failed not allowing the valve discs to fully close (corrosion).
- d. The valves (butterfly valves) may not be the best design for this application (design application)

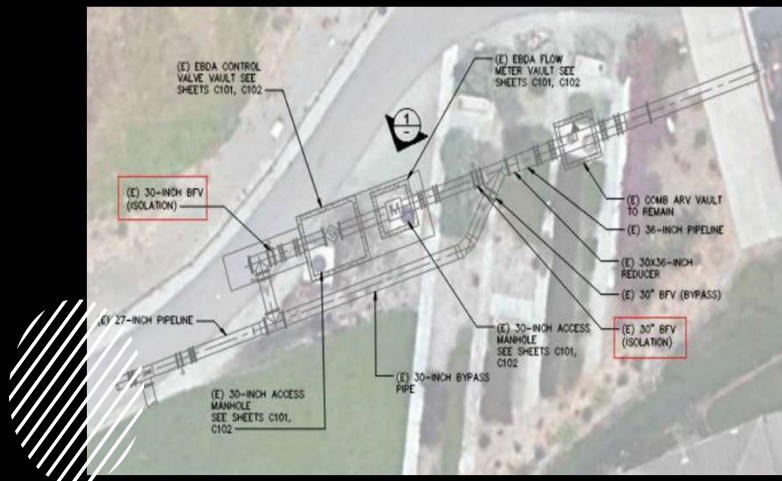


Western Terminus "Gate Valve" valve it successfully isolates LAVWMA from EBDA

Dewater ~ 10,000 ft of 36" pipeline (~529,000 gallons)







- Long Term Solution (future capital project)
- A decision needs to be made regarding what to do long term about the failure of these isolation valves.
 - Replace the valve operating mechanisms?
 - Replace all four valves with one better suited for isolation.
 - Install Two 30" Gate valves one upstream and one downstream of the meter/control valve that are better suited for isolation
- Decide that dewatering the pipeline will be the approach to any future maintenance of the EBDA valve and meter.

Engineer Condition Asset Technical Memorandum

October 1, 2025- Task Order signed between LAVWMA and Carollo Engineers to conduct a condition assessment of LAVWMA's large assets

- **Pumps and Motors** – Maintenance Records are being reviewed by Carollo Engineers. Carollo Engineers Mechanical Engineers conducted a site visit
- **Electrical Switchgears and Motor Control Centers** - Maintenance Records are being reviewed by Carollo Engineers Carollo Engineers Electrical Engineers conducted a site visit
- **Export Pipeline and Valves** – CCTV Inspection Reports are being reviewed by Carollo Engineers and they are aware of the issue with aging large valves in the LAVWMA system.
- **Storage Reservoirs** – Have been Inspected by Carollo Engineers
- **Wet Weather Outfalls (SLSS and Alamo Canal)** - Have been Inspected by Carollo Engineers

Carollo Engineer's Asset Management Technical Memorandum Expected by October 1, 2026.

ITEM NO. 12 AUTHORIZATION TO PROCEED WITH WORK ON THE SAN LEANDRO SAMPLE STATION UPGRADE PROJECT

To: LAVWMA Board of Directors

From: Levi Fuller, General Manager

Subject: Authorization to Proceed with Work on the San Leandro Sample Station Project

Action Requested

Authorize the General Manager to:

- Proceed with the planned August 2026 LAVWMA system outage and authorize the additional dewatering and associated work on a documented T&M basis, within the funding authority presented to the Board.
- Continue administration of the remaining construction work necessary to complete the Project.

Background and Updates

Unanticipated challenges:

- The Project faced more delays due to delivery of the 30" control valve. LAVWMA sole sourced the purchase of this valve.
- Contractor planning and execution issues contributed to delays prior to 2026; contractor performance improved after implementation of the Corrective Action Plan (February 2026).
- On July 23, 2026, LAVWMA attempted to shut down and isolate the LAVWMA pipeline so the contractor could install the new control valve and meter. However, LAVWMA's system isolation valves failed to provide adequate and safe isolation (the valves are > 22 years old). This has added unanticipated costs to achieving project completion.

Overall Operating and Capital Program Budget Analysis

Original Construction Contract - \$1.394 million

Approved change orders to date - \$49,000.00

Subtotal Contract and Change orders - \$1.443 million

Additional Increase not yet approved - \$330,000 - \$360,000.

Additional Increase breakdown:

- Pending change orders - \$81,000
- Remaining field work not-to-exceed - \$133,000
- Other unresolved project costs - \$146,000

Additional CM and inspection services - \$30,000

Construction Project Cost Paid as of July 2026 - \$904,483.00

Estimated remaining construction costs to complete the project - \$895,517.00.

Estimated remaining CM and inspection costs to complete the project - \$30,000.00.

Estimated remaining construction, CM, and inspection costs - \$925,517.00.

Current FY2026/27 budget to close out the project - \$528,665.

Current unbudgeted cost to close out the project - \$396,852.

This project cost would increase LAVWMA's operating budget for FY2026-2027 from \$12,712,548 to \$13,109,000 and increase of 3.12%. This adjustment would increase the overall Capital Program budget from \$7,057,700 to \$7,454,552, an increase of 5.6%. This adjustment would bring the repair and replace budget for FY 2026/27 from \$1,648,700 to \$2,045,552. For reference LAVWMA's repair and replacement budget ranged from \$4.2 to \$4.6 million in the five budget years from FY2020/21 to FY2025/26.

Attachment

PowerPoint Presentation by HydroScience Engineers, Inc – Project Construction Manager

SLSS Project Update

December 2025 Board Update Recap

- Specialty 30” Ball Control Valve arrived in late September (end of dry weather).
- Contractor planning, execution, and system integrator scheduling issues contributed to schedule challenges in 2025.
- Winter shutdown deemed too risky, delayed until no earlier than May 1, 2026.
- SLSS vault lid fit-up problem discussed, planned for resolution in 2026.

1

Subsequent Progress Made

Corrective Action Plan (CAP)

- Agency Directive Letter issued.
- Change in contractor project manager required. Matt Finley, Area Manager, took over the role in February 2026.
- Subsequent performance is substantially improved.
- Corrective Action Plan and recovery schedule received, modified, and accepted in March 2026.
- The plan has been actively managed and substantially adhered to.

2

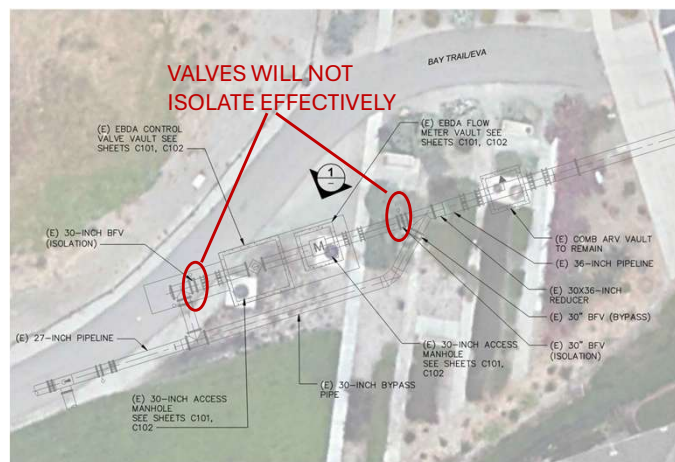
Subsequent Progress Made

- SLSS vault lid fit-up issues resolved.
- All SORs approved for remaining work after extensive coordination and review.
- Temporary park trail installed, safety fencing installed, ongoing maintenance occurring, no complaints.
- Excavation and existing vault lids demolition completed.
- Project was scheduled to be completed in July per the CAP.

3

New Challenge Encountered

- The Contract Specifications called for owner isolation at this location and Contractor dewatering of the short segment.
- The existing isolation valves did not provide effective isolation. After significant pumping, levels were not reduced and work could not proceed.
- Work paused for subsequent investigation and reworked dewatering plan. This is a **new delay** that will have a cost and schedule impact.



4

Subsequent Dewatering Investigation

LAVWMA, DSRSD, HydroScience, and M&H collaborative effort with the following findings:

- Test of Western Terminus valve isolation and pipeline water level measurements performed on 7/29.
- Downstream Western Terminus valve can be closed, but upstream pipe will not drain lower than EBDA hydraulic grade line and low tide. No other nearby isolation available.
- **Result: the original dewatering approach is not feasible; substantially greater pumping capacity and coordination are required.**
 - Estimated dewatering volume at minimum drain-down level: **600,000** gallons.
 - Discharges to local sewer must be coordinated with Oro Loma.

5

Delay Factors and Responsibilities

- Late delivery of the specified sole-source 30-inch valve prevented installation before the end of the 2025 dry-weather season.
- Contractor planning and execution issues contributed to delays prior to 2026; performance improved after implementation of the Corrective Action Plan.
- **The July 2026 outage revealed an unanticipated isolation and dewatering condition that created additional delay and extra work.**
- With the Board's approval, a second attempt with increased dewatering effort will start on 8/26 to support a Tesco integration window of 8/31. This is urgent to assure completion in 2026. The risk of a failed attempt has been reduced as much as possible but is not zero due to tides, EBDA hydraulics, system age, and other factors.

6

Cost Status

Item	Approximate amount
Original construction contract	\$1.394 million
Approved change orders to date	\$49,000
Subtotal: contract plus approved change orders	\$1.443 million
Additional increase not yet approved	\$330,000 – \$360,000
Forecasted not-to-exceed total construction cost ¹	\$1.8 million
Additional increase breakdown:	
Pending change orders	\$81,000
Remaining field work not-to-exceed ²	\$133,000
Other costs ³	\$146,000
Additional CM and inspection services ⁴	\$30,000

¹ Forecast includes base contract, approved and pending change orders, remaining work with increased dewatering, and resolution of delay-related costs. **Assumes a successful dewatering effort and completion of major work in August.**

² Estimated on a T&M basis with a 10% contingency.

³ Includes delay-related costs. Subject to validation and negotiation.

⁴ Based on timely completion of remaining work and a streamlined negotiation and closeout process.

7

Pathways to Cost and Delay Resolution

- Project delay resulted from multiple causes over the life of the project, with responsibility disputed and overlapping.
- Contractor has proposed an open-book settlement with verified actual costs and a reduced 5% fee. *This proposal is being further detailed and reviewed. Staff is not requesting selection of a settlement pathway at this meeting. The following pathways are under evaluation:*
 - **Path A — Conventional Contract Resolution:** Resolve each PCO individually; evaluate contractor delay/inefficiency claims; evaluate LAVWMA's LD position; negotiate each disputed item under the Contract.
 - **Path B — Negotiated Open-Book Resolution:** Audit actual project costs; establish allowable cost categories; negotiate the fee/markup; resolve outstanding PCOs, delay claims and LD issues through a comprehensive settlement.

8

Board Action Requested

Authorize the General Manager to:

- Proceed with the planned August 2026 outage and authorize the additional dewatering and associated work on a documented T&M basis
- Continue administration of the remaining construction work necessary to complete the Project and negotiate final project costs and delay claims.
- Conform to a not-to-exceed final construction contract value of up to \$1.8 million

ITEM NO. 13 UPDATE AND RESPONSE TO VARIOUS LEGAL AND LEGISLATIVE ISSUES

To: LAVWMA Board of Directors
From: Levi Fuller, General Manager
Subject: Update and Response to Legal and Legislative Issues

Action Requested

None at this time. This is an information item only.

Summary

Attached is information from BACWA and CASA.

Recommendation

None at this time. This is an information item only.

Attachments

- A. BACWA Bulletin – July 2026
- B. CASA Bulletin – July 2026

BACWA Bulletin - July 2026

BACWA <noreply@bacwa.org>
Reply-To: BACWA <noreply@bacwa.org>
To: fuller@lavwma.com

Wed, Jul 1, 2026 at 3:51 PM

[View this email in your browser](#)



BACWA Bulletin

July 2026

In this email:

- [Join BACWA and SFEI at the Exploratorium](#)
- [BACWA Annual Members Meeting materials available](#)
- [Nutrient Management Strategy adopts FY27 Program Plan](#)
- [Water Quality Trading: Outreach materials available; Upcoming webinars and workshop](#)
- [BACWA hosts first Nutrient Infoshare Webinar](#)
- [Deadline for Wastewater Rates Questionnaire extended to July 17](#)
- [CVCWA seeks new Executive Officer](#)
- [Member Updates](#)
- [BACWA Committee Updates](#)
- [Other Upcoming Events](#)

- **Asset Management Committee** - July 7, Virtual
- **O&M Infoshare Committee** - July 9, San Mateo
- **Recycled Water Committee** - July 21, Virtual
- **Bay Area Pollution Prevention Group** - August 5, Virtual
- **Bay Area Biosolids Coalition** - August 10, West County Wastewater
- **Permits Committee** - August 11, Virtual
- **Collection Systems Committee** - August 13, Virtual
- **Laboratory Committee** - August 18, Virtual
- **AIR Committee** - August 19, Virtual
- **Executive Board** - August 21, EBMUD

See the BACWA Calendar for details

Join BACWA and SFEI at the Exploratorium

Come say hello to SFEI and Central San, EBMUD, NapaSan, and SFPUC as they come to the Exploratorium for their **Bay Day event on Saturday, August 1**. This annual event is timed with the Exploratorium NOAA buoy's annual servicing, and lets participants meet the sea life that has grown on the buoy in the past year. Bay Day is a celebration of our estuary, and the inclusion of SFEI and BACWA members shows how the local science and wastewater communities contribute to the protection and celebration of the San Francisco Bay. More details [here](#).

BACWA Annual Members Meeting materials available

Thank you to our members, regulators, and guest speakers for making our 2026 Annual Members Meeting a success! Slides from the presentations are now available on the [BACWA website](#). Highlights include:

- Regulatory priorities and other updates from [USEPA Region 9](#), [State Water Board](#), [Regional Water Board](#), and [Bay Area Air District](#).
- Updates on implementation of the 2024 Nutrient Watershed Permit, including [Regional Planning projects](#), updates on the [Science Program](#), and plans for establishing a [Nutrient Trading Program](#).
- Presentations on disaster preparedness from [EBMUD](#) and the [City of San Jose](#).
- A lively discussion on wastewater communications, including the release of BACWA's new regional messaging [video](#) and panelists from [Central San](#), [Fairfield-Suisun Sewer District](#), and [EBMUD](#).

Nutrient Management Strategy adopts FY27 Program Plan

The [Nutrient Management Strategy](#) Steering Committee, working with scientists at the San Francisco Estuary Institute, has been working over the last year to craft an updated science program plan that reflects stakeholder needs and federal funding scenarios. The [FY26 Program Plan](#) was approved by the Steering Committee in May 2026. The document was submitted to the Regional Water Board, as required by the Nutrients Watershed Permit.

Water Quality Trading: Outreach materials available; Upcoming webinars and workshop

BACWA is working with HDR and [The Freshwater Trust](#) to develop a water quality trading program for the Nutrients Watershed Permit. The effort builds on The Freshwater Trust's [2025 Water Quality Trading Feasibility Assessment](#). Water quality trading could enable BACWA member agencies with Permit limits to work together to protect the Bay. A [two-page handout](#) about the proposed trading program is now available.



This summer, BACWA and The Freshwater Trust are hosting webinars on different aspects of the trading program as well as an in-person workshop. The webinars, a Program Technical Update, Lessons from Successful Trading Programs, and Workshop Preparation will be held on June 24, July 10, August 18, respectively. Recordings will be made available to BACWA members. On **Monday, August 31**, BACWA and The Freshwater Trust will host a full-day, in-person workshop for BACWA members at EBMUD's offices in downtown Oakland. Invitations for the webinars and workshop have been distributed to all agencies with nitrogen limits in the 2024 Watershed Permit.

BACWA hosts first Nutrient Infoshare Webinar

On June 1, BACWA held its first Nutrient Infoshare Webinar on the theme of "Adventures in Optimization." The City of San Jose, City of Benicia, and EBMUD shared their optimization journeys with over 70 attendees. The meeting also included a Q&A session and updates on regulatory issues. The presentations are available at [this link](#). The next Infoshare webinar will be scheduled in October.

Deadline for Wastewater Rates Questionnaire extended to July 17

The State Water Board is accepting responses to the [Wastewater Rates Questionnaire](#) through July 17. This voluntary survey, developed in collaboration with CASA, gathers residential wastewater rates data for 2019-2025 and it is critical for evaluating economic impacts and affordability, and identifying community financing needs. Participation from a wide range of agencies creates a large database, useful in comparing rates across jurisdictions. This Statewide data will come in handy next time your agency prepares for a rate increase; please do your part and participate, if you have not done so already. Additional information and guidance is [available here](#).

BACWA's sister association in the Central Valley, the Central Valley Clean Water Association ([CVCWA](#)) is recruiting its next Executive Officer. CVCWA's mission is to effectively represent the interests of wastewater agencies in the Central Valley in regulatory matters and to support the exchange of information across its membership of 50+ public agencies. The EO works in partnership with CVCWA's Board of Directors and provides leadership for CVCWA's advocacy, operations, member services, and organizational infrastructure. Interested candidates should apply by July 20th. [Learn More](#).

Member Updates

Central San 80th Anniversary Community Celebration



On June 13th, Central San celebrated **80 years of service** by hosting a sewer spectacular community event featuring tours, behind-the-scenes discoveries, and hands-on activities. The celebration was a grand success and fun was had by all.

Does your agency have news to share? [Let us know!](#)

BACWA Committee Updates

AIR Committee

At its [May meeting](#), the AIR Committee discussed Air District permitting updates, including from the District's Permitting Task Force and from BACWA members' early experiences with the Engineering Program Manager ([EPM](#)) Pilot Program. The next meeting is August 19.

[Asset Management](#)

The next Asset Management Committee meeting will be held virtually on July 7. It will feature a guided group discussion on Asset Classes and Attributes.

[Bay Area Pollution Prevention Group \(BAPPG\)](#)

At its June meeting, BAPPG received an update on the success of the Spring campaign for Bay-friendly flea and tick pet control. Over 1.7 million digital impressions were made in just over three weeks from April 13 to May 3. The group also reviewed BAPPG outreach materials related to FOG (scrapers, posters, etc.) and held a roundtable to evaluate the materials' usefulness and potential ways to update them. The next meeting is August 5.

Bay Area Biosolids Coalition (BABC)

The next BABC meeting will be held on August 10, in person at West County Wastewater and will include a tour of West County's new digesters and biosolids processing facilities.

Collections Systems Committee

At the [May meeting](#), Committee members received an overview of Los Angeles County Sanitation Districts latest inflow and infiltration reduction efforts, including use of investigative tools such as GoPro and trail cameras. Attendees also toured Ross Valley Sanitary District's admin facility, data analytics visualizations, and new field tools, and vehicles. The next meeting is scheduled for August 13, and will be held virtually.



Thank you to RVSD for hosting BACWA!

Laboratory Committee

The June meeting included presentations on laboratory document and records management systems from [LabMOD0](#), [EBMUD](#), and [San Jose](#). The next meeting is in August, and will be held virtually.

O&M Committee

The Committee's next Infoshare meeting will be held in person at the City of San Mateo's newly upgraded Wastewater Treatment Plant on July 9.

Permits Committee

The June meeting featured an update on and data solicitation for the State Water Board's [2030 Integrated Report \(303\(d\) List\)](#). The data solicitation window is open through August 10, 2026. The meeting also included updates on recently reissued NPDES permits, recent USEPA inspections, and Nutrients Watershed Permit compliance activities. On the latter topic, we heard updates on the development of a regional nutrient trading program and Fairfield Suisun Sanitary District presented on their [Journey toward Nutrient Reduction](#).

Pretreatment Committee

The committee's June meeting was hosted by EBMUD and featured regulatory updates from the Regional Water Board, the State Water Board, and [EPA Region 9](#). Tara McClintock, the pretreatment coordinator for NapaSan, also presented an overview of her agency's [pretreatment program](#). BACWA also hosted Joe Lucia, representing the CWEA P3S Committee, who presented Amelia



Amelia Whitson and Joe Lucia

Recycled Water Committee

The next committee meeting is slated for Tuesday, July 21st, and will feature a presentation on Sac Sewer's Harvest Water, California's largest agricultural water recycling project.

To join any BACWA Committee, members can sign up [here](#).

Other Upcoming Events

July 8-10

CWEA Collection Systems Mid-Summer Workshop

CWEA's Collection Systems Committee is heading back to San Luis Obispo for three days of training, hands-on learning, and connection. Day one kicks off with the Collection Systems Fundamentals session led by William Kleinau. Day two focuses on spill response with live demos by Andy Morrison, vendor exhibits, and practical training covering regulations, reporting, containment, volume estimation, and response techniques. On Friday, the Committee will host its annual summer meeting.

Breakfast and lunch are included with registration. More details and registration [here](#).

August 4-7

CASA Annual Conference

CASA is hosting its 2026 Annual Conference at the Meritage Resort & Spa in Napa! The [program](#) will feature a variety of speakers and panels, technical tracks, awards presentations, and opportunities for the clean water community to connect on shared goals. CASA's committee leaders and subject matter experts will be

on hand to provide all the latest information on legislative and regulatory proposals. Registration and hotel information can be found [here](#).

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For questions about CASA News, please contact [Alyssa Downs](#).

Register Today for CASA's Annual Conference

Join CASA's 2026 Annual Conference, *Rooted in Resilience*, August 5–7 at the Meritage Resort and Spa in Napa. Connect with clean water leaders from across California for timely educational sessions, policy updates, technical discussions and valuable networking opportunities. The conference also features special events, including the CASA Education Foundation Golf Tournament, Wine Tasting Fundraiser and a behind-the-scenes tour of NapaSan's innovative resource recovery facilities. [Register today](#) and make plans to join us! We look forward to welcoming members and partners to Napa for another memorable conference experience.



- **Reminder: Early Bird Registration Ends July 7**

There's still time to save! [Register](#) by Tuesday, July 7 to receive the Early Bird Full Conference rate of \$875 before it increases.

- **Conference Schedule Update: State and Federal Legislative Committee Meetings**

Returning conference attendees will notice a change to this year's schedule. The State Legislative Committee Meeting and Federal Legislative Committee Meeting have been moved to Thursday afternoon, and are now part of the main conference program. As always, both meetings are open to all conference attendees. Whether you're interested in legislative advocacy or simply want to hear the latest updates on state and federal issues impacting California's clean water community, we encourage you to join us! Please note this schedule change when making your travel plans.

- **Phishing Alert**

We have been made aware of phishing emails posing as CASA and claiming to assist with conference registration or hotel reservations. Please note that these messages are not from CASA. We will never ask you to register or book accommodations through unsolicited third-party emails. If you receive a suspicious message regarding the conference or hotel bookings, do not click any links or provide personal or payment information. If you're unsure whether a communication is legitimate, please contact us directly.

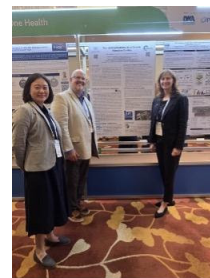
CASA Mentoring Program

The CASA Mentoring Program is returning for the 2026–27 program year! This exclusive member benefit connects clean water professionals from across California to support professional growth, leadership development and meaningful peer connections. **The program is open to all employees of CASA member agencies and associate member organizations**, whether you're interested in serving as a mentor or a mentee. If you'd like to be added to the interest list or have questions about the program, please email Alyssa Downs at adowns@casaweb.org. We also encourage you to share this opportunity with colleagues who may be interested in participating.



CASA Highlights Circular Economy Collaboration at Singapore International Water Week

CASA co-authored a cross-state presentation, "[Revisioning Systems for a Circular Resource Society](#)," at the Singapore International Water Week (SIWW), showcasing how regions with different regulatory frameworks and resource challenges are advancing shared circular economy goals.



The presentation highlighted circularity efforts across three states.

California featured organics management initiatives such as SB 1383, cross-sector advocacy to phase out PFAS in products, and the recently released Zero Waste Plan. Texas shared examples of water reuse projects, innovative financing approaches, policy support mechanisms, and a biogas-to-pipeline partnership. Wisconsin highlighted The Water Council, a Milwaukee-based consortium advancing watershed health through innovation, resource sharing, and collaborative climate resilience initiatives. Together, these case studies underscored that while approaches vary by region, cross-sector collaboration and regional innovation are essential to advancing circular resource systems.

Happy Flush Smart Month!

July is Flush Smart Month, led by the Responsible Flushing Alliance (RFA), and a timely reminder to continue reinforcing smart flushing habits in our communities. To support outreach this year, RFA has launched *Bathroom Bootycamp*, a lighthearted campaign with ready-to-use tools including a 7-day challenge, social media assets, infographics and educational materials to help engage the public. Explore the toolkit here: <https://flushsmart.org/bathroom-bootycamp/>



We encourage CASA members to use and share these resources in public education and outreach efforts throughout the month.

REGULATORY UPDATE

For questions about the Regulatory update, please contact [Spencer Saks](#).

USEPA Releases Long-awaited Draft Guidance on Reducing Risk from PFOA and PFOS in Biosolids

On July 1, Jess Kramer, USEPA's Assistant Administrator for the Office of Water, released [Draft Guidance on Reducing Risk from PFOA and PFOS in Biosolids](#). In the wake of the Draft Sewage Sludge Risk Assessment for PFOA and PFOS, communities across the nation have had to identify a path forward to address uncertainty and confusion posed by the Draft Risk Assessment. Specifically, the Draft Guidance acknowledges:



- The 1 ppb exposure level is flawed and has contributed to the misconceptions surrounding the safety of biosolids land application.
- Typical risk assessment steps, such as the National Sewage Sludge Survey, were left out, which are critical in understanding actual occurrence and potential risk.
- Hypothetical scenarios were focused on over actual, real-world practices of regulated land application of biosolids.

In summary, the Draft Guidance aims to clarify the USEPA's stance on biosolids land application and the value this option provides to the vast network of U.S. wastewater agencies and farmers. Drawing on the proven history of the biosolids program and highlighting that 60% of biosolids generated in the country relies on biosolids land

application, representing less than 1% of American farmland. State approaches were also highlighted, demonstrating drivers for these programs, including tier-based guidance for land application, monitoring concentrations at facilities, and bans on biosolids land application. While varied in design, there has been broad acceptance for source control to identify potential PFAS contributions. Recommendations were also included for land appliers, the general public, and water resource recovery facilities.

The Draft Guidance will have a 60-day public comment period beginning the day the Federal Register is published (expected the week of July 6). CASA will plan to review this Draft Guidance and offer comments. Please stay tuned for additional updates.

CASA has offered two comment letters ([3/28/25](#) and [8/11/25](#)) on the Draft Sewage Sludge Risk Assessment for PFOA & PFOS, supplemented by a comprehensive review by the [USDA Multi-State Research W5170 Committee](#). More recently, CASA offered comments on EPA's Interim Guidance on the Destruction and Disposal of PFAS.

▶ IN CASE YOU MISSED IT

Governor Newsom Announces Key Water Leadership Appointments

Governor Gavin Newsom recently appointed Jared Blumenfeld to the State Water Resources Control Board and reappointed Dorene D'Adamo to another term on the Board. The Governor also announced the appointments of Anna Naimark as Undersecretary at the California Environmental Protection Agency and Thomas Gibson as Director of the California Department of Water Resources. Read the official press releases to learn more about these appointments and their backgrounds.

[Blumenfeld & D'Adamo Appointments](#)
[Naimark & Gibson Appointments](#)



▶ UPCOMING EVENTS

Educate 2 Lead Program Now Accepting Applications

Water Education for Latino Leaders (WELL) and the California African American Water Education Foundation (CAAWEF) are now recruiting for the third cohort of the Educate 2 Lead (E2L) leadership development program. CASA is a strong supporter of this workforce development effort.



E2L is designed for mid-level professionals in California's water and energy sectors and combines in-person leadership training in Southern California with mentorship from senior industry leaders and hands-on learning. Participants build leadership skills, expand their professional networks, and gain insight from general managers and executives across the state. Applications are due July 24, 2026. Learn more and access application materials: <https://latinosforwater.org/educate-to-lead/>

2026 WateReuse California Annual Conference

Join colleagues from across the state on August 24–26, 2026, in San Francisco, CA for the 2026 WateReuse California Annual Conference. Hear from leading practitioners, learn about San Francisco's leadership in onsite water recycling, and connect with colleagues from across California in a collaborative and engaging environment. Learn more and [register here](#).



CSDA Annual Conference & Exhibitor Showcase

Join special district leaders from across California August 24–27, 2026, in Palm Desert for the CSDA Annual Conference & Exhibitor Showcase. This event offers valuable networking opportunities, access to the latest innovations and services and more than 40 educational breakout sessions focused on the issues and trends impacting special districts today. Learn more and [register here](#).



Early Registration Now Open for the 2026 AWWEE Conference

Early registration is now open for the 2026 AWWEE Conference, taking place November 4–6 at the Portola Hotel & Spa in Monterey. This year's theme, Anchored in Purpose, will bring together professionals in the energy, water and environmental sectors for inspiring keynote speakers, educational sessions, networking opportunities and more. Active AWWEE members can register now, with member rates increasing and registration opening to non-members on August 8.



Visit CASA's [Job Board](#).



CASA represents more than 150 local public agencies engaged in the collection, treatment and recycling of Wastewater and biosolids to protect public health and the environment. Our mission is to provide trusted information and advocacy on behalf of California clean water agencies, and to be a leader in sustainability and utilization of renewable resources.

[Visit Our Website](#)

CASA | [925 L Street, Suite 200](#) | [Sacramento, CA 95814 US](#)

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ITEM NO. 14 GENERAL MANAGER'S REPORT

To: LAVWMA Board of Directors

From: Levi Fuller, General Manager

Subject: General Manager's Report

Action Requested

None at this time. This is an information item only.

Summary of General Manager's Work Activity

The General Manager (GM) agreement is for a term of two years and began on April 1, 2024. On August 19, 2025, the LAVWMA Board approved a 1st amendment to extend the General Managers' agreement until June 30, 2029.

There is a limitation of 1,000 hours per fiscal year for General Manager's Administrative Services (GMAS). After assuming the duties of General Manager at the May 15, 2024 Board meeting, the LAVWMA Board of Directors additionally delegated the LAVWMA General Manager with the responsibility of serving as LAVWMA's Treasurer. To date, approximately 25% of the General Manager's time has been dedicated to Treasurer responsibilities.

As of June 30, 2026, and the end of the 4th quarter of the fiscal year, the LAVWMA General Manager / Treasurer worked 645.25 hours during FY2025/26.

Administrative Services

- LAVWMA Website ADA Compliance Project:
 - March 12, 2026 - Signed an agreement with TCrest for services to ensure LAVWMA's website is ADA compliant. The website has to be ADA Compliant by April 1, 2027.
 - June 30, 2026 - 30% complete on the website document remediation Project.
 - LAVWMA files are being uploaded to a staging server.
 - Initial ADA / WCAG 2.2 AA Accessibility Audit Report - Completed 5/24/2026.
 - Accessibility Statement Draft - Completed 6/5/2026.
 - Remediation Plan & Prioritization Report - Completed 6/20/2026.
 - Implementation & Testing Remediation (all identified documents) - Completed 7/25/2026.
 - Project is on track to complete by October 15, 2026.
- LAVWMA Records Digitalization Project:
 - Task 1 – Revised Records and Retention Policy to the Board on August 19, 2026.
 - Reviewed and acquisition of Digital Storage Software - Completion by January 2027.
- July 21, 2026 – Special District Risk Management Authority sent a letter of acknowledgment. LAVWMA received the ***President's Special Acknowledgement Award*** for having no paid property or liability claims for the period of 2021 thru 2026:

- One incentive point for the 2025-26 year.
- Three additional bonus points for the previous 5 years.

National Pollutant Discharge Elimination System (NPDES) Compliance

- June 15, 2026 – DSRSD submitted 2025 annual self-monitoring report for Livermore-Amador Valley Water Management Agency (attached).
- A LAVWMA tentative order went to the Water Board for approval on August 12, 2026. LAVWMA General Manager attended that meeting:
 - February 23, 2026 – Met with Water Board and DSRSD staff for the Water Board's annual inspection of LAVWMA Pump Station Facilities – Successful Inspection.
 - June 05, 2026 – LAVWMA's Tentative Order for renewal of 5-year NPDES permit was released for public comment. Public comment period ended on July 6, 2026.
 - June 16, 2026 – Met with Water Board and DSRSD staff for the Water Board's annual inspection of LAVWMA San Leandro Sample Station Facilities – Successful Inspection
- June 12, 2026 – LAVWMA General Manager requested and the Water Board granted LAVWMA a temporary exemption letter to test the newly installed infrastructure improvements at the San Leandro Sample Station.
- August 12, 2026 – California Regional Water Quality Control Board revised LAVWMA's NPDES Permit No. CA0038679 the new NPDES permit is effective October 1, 2026 and expires September 30, 2031.
- EBDA is starting the application process to renew its NPDES permit to discharge to San Francisco Bay. The renewal application is due November 30, 2026. The current EBDA NPDES permit expires August 31, 2027.

Financial Management

- On July 30, 2026 – LAVWMA Bond payment made to US Bank in the amount of \$6,044,200.00.
- Cost of service invoice was issued to the City of Livermore in the amount of:
 - 01/01/2026 – \$1,114,938.29 – paid.
 - 07/2026 – Invoice #119 - \$2,665,085.30 – paid.
- Cost of service invoice was issued to DSRSD (on behalf of DSRSD and the City Pleasanton) in the amount of:
 - 01/01/2026 – \$2,081,286.62 – paid.
 - 07/2026 – invoice #120 - \$6,424,538.70 – paid.
- On July 23, 2026 – \$6,400,000 transferred from CAMP to LAIF - LAIF interest rates at the time of the transfer were 3.84% and CAMP interest rates were 3.78%. General Manager met with a representative from California CLASS to discuss taking advantage of their Term Series II account which has an interest rate of 4.19%. The Board previously approved use of California CLASS through the update of its Investment Policy.
- Completed payment of DSRSD Contract Service invoices for:
 - July 2025 in the amount of \$302,896.16
 - August 2025 in the amount of \$425,237.26

- September 2025 in the amount of \$341,287.02
 - October 2025 in the amount of \$ \$363,966.60
 - November 2025 in the amount of \$309,792.76
 - December 2025 in the amount of \$403,080.41
 - January 2026 in the amount of \$389,157.41
 - February 2026 in the amount of \$443,134.83
 - March 2026 in the amount of \$318,067.33
 - April 2026 in the amount of \$194,204.92
 - May 2026 in the amount of \$244,233.31
- January 10, 2026 – Received invoice from EBDA in the amount of \$583,040:
 - January 30, 2026 – Paid \$463,301.16 (LAVWMA had a credit with EBDA in the amount of \$119,738.84)
 - Reviewed LAVWMA financial account balances twice per month at a minimum.

Operations and Maintenance

- The GM attended the quarterly LAVWMA Operations & Maintenance (O&M) meetings in November 2025, January 2026, February 2026, May 2026 and July 2026, giving and receiving updates on LAVWMA Capital and O&M projects.
- The GM reviewed the 4th Quarter FY2025/26 Quarterly Report of Operations completed by the DSRSD's Operations staff.
- The GM attended the monthly East Bay Dischargers Authority (EBDA) managers' meetings, sending recorded meeting notes to relevant DSRSD, City of Livermore, and City of Pleasanton staff members.
- The GM reviewed monthly LAVWMA Laboratory Reports.
- The GM performed bi-monthly inspections of the Pump Station.
- The GM performed bi-monthly inspections at the San Leandro Sample Station.

Capital Projects

- FEMA reimbursement update for Livermore Pipeline Projects.
 - Director Evan Branning forwarded to General Manager Fuller the contact information for Jackson Berg, Community Outreach Manager for Congressman Eric Swalwell.
 - General Manager Fuller and LAVWMA FEMA Consultant KCG Consulting met with Mr. Jackson Berg of Congressman Swalwell's Office on March 19, 2026, in order to request assistance with FEMA reimbursement for the Livermore pipeline project.
 - March 23, 2026 – General Manager Fuller forwarded to Mr. Jackson Berg 1) Request for Support letter, 2) Privacy Release Statement, and 3) a copy of the FEMA Project Acceptance form.
 - April 09, 2026 – LAVWMA received a notice from a Constituent Services Representative of Congressman Swalwell's office that a formal inquiry regarding this reimbursement had been submitted.
 - July 3, 2026 – LAVWMA General Manager sent a letter to California Governor's Office of Emergency Services inquiring about obligation status of FEMA reimbursement for the repairs of the Livermore pipeline. (attached)
 - July 3, 2026 – CalOES sent letter to FEMA administrator regarding status of FEMA funding

for projects in California including LAVWMA (attached)

- See attached (General Manager Capital Project Update) for information regarding other capital projects.

Legal and Other Administrative

- The GM conducted monthly individual check-in meetings with executive staff of LAVWMA Member Agencies (DSRSD, the City of Livermore and the City of Pleasanton).
- The GM is currently collaborating with legal counsel on the LAVWMA/City of Livermore Easement Lease Agreement.
- The LAVWMA General Manager and legal counsel have collaborated with DSRSD staff and legal counsel working on terms and conditions of a Power Purchase Agreement (PPA) for a solar project at the LAVWMA Pump Station and other DSRSD sites. After careful consideration DSRSD and LAVWMA determined that the vendor could not offer terms and conditions for a PPA that were in LAVWMA or DSRSDs best interest and, therefore, the Letter of Intent to negotiate a PPA was allowed to expire on March 18, 2026. Per the Board's direction, staff will continue to evaluate opportunities to pursue solar power alternatives.

Recommendation

None at this time. This is an information item only.

Attachments

- A. 2025 LAVWMA Annual Self-Monitoring Report
- B. July 3, 2026 – LAVWMA General Manager sent a letter to California Governor's Office of Emergency Services
- C. July 3, 2026 – CalOES sent letter to FEMA administrator regarding status of FEMA funding for projects in California including LAVWMA
- D. General Manager LAVWMA Projects Update
- E. General Manager Status Update on LAVWMA Goals for FY2025/26 and Proposed Goals for FY 2026/27
- F. SDRMA Special President's Acknowledgement Award Letter for LAVWMA
- G. Alameda County 405 filing
- H. Contra Costa County 405 filing
- I. California 405 filing

June 15, 2026

Ms. Eileen White, Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612

Attention: Ms. Natlie Lee, Environmental Scientist

RE: 2025 Livermore-Amador Valley Water Management Agency Annual Self-Monitoring Report

Dear Ms. White:

Enclosed is the 2025 Annual Self-Monitoring Report (SMR) for the Livermore-Amador Valley Water Management Agency (LAVWMA) export and storage facilities. This report meets the requirements of the annual SMR in LAVWMA's National Pollutant Discharge Elimination System (NPDES) Permit No. CA0038679 (Order No. R2-2021-0007). The annual SMR was uploaded to California Integrated Water Quality System (CIWQS) on June 15, 2026.

During the reporting period, all monitored parameters for the required characterization study were within permitted limits. Priority pollutants were not monitored in 2025, however results from the 2023 monitoring showed total chromium was 19 µg/L at the San Lorenzo upstream location (RSW-002U). Resampling and chromium speciation was conducted in 2025 and showed chromium VI was below the threshold for reasonable potential analysis. There were no wet weather discharges but the discharge event on November 11, 2025 (granted by the Regional Water Quality Control Board (RWQCB) to test significant upgrades to the San Leandro Sample Station) showed residual chlorine above acceptable levels. After a thorough review and timely correspondence, both DSRSD and RWQCB concluded and agreed that based on the conditions and calculations presented it was highly improbable for chlorine to have been discharged to the creek. No other discharge exercises were conducted, as prerequisite conditions and staff availability precluded such activity.

Due to an issue with linking DMRs in CIWQS, dischargers have been unable to complete DMR reporting since December of 2025. The State Water Resource Control Board has issued guidance on the CIWQS webpage to unlink the DMRs until the DMR reporting issue is resolved. Once the reporting issue is resolved and within the time allowed, DMRs will be linked.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the

information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Dan Gill

Dan Gill
DSRSD Operations Director

cc: Levi Fuller, General Manager, LAVWMA
Anthony Smith, Water Resources Division Manager – City of Livermore
Michael Jeffery, Acting Water Resources Operations Manager – City of Livermore
Siew-Chin Yeong, Director of Public Works – City of Pleasanton
Kristy Fournier, Deputy Director of Operations - Regulatory – DSRSD
Tim Lewis, WWTP Operations Superintendent – DSRSD
File, Records

2025 NPDES SELF-MONITORING PROGRAM ANNUAL REPORT

NPDES PERMIT NO. CA0038679

Livermore-Amador Valley Water Management Agency

June 15, 2026



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Introduction

This is the 2025 annual self-monitoring report per Order No. R2-2021-0007, NPDES Permit CA0038679, for the Livermore-Amador Valley Water Management Agency (LAVWMA) export and storage facilities. LAVWMA does no treatment of wastewater but conveys fully treated secondary effluent from the Dublin San Ramon Services District's (DSRSD) and the City of Livermore's wastewater treatment plants to the East Bay Dischargers Authority (EBDA) for final disposal into San Francisco Bay. LAVWMA's location of discharge to EBDA is at the San Leandro Sample Station (M-001), and there are two permitted wet weather outfalls, one in San Leandro at San Lorenzo Creek (M-002) and the other in Pleasanton at Alamo Canal (M-003).

On May 12, 2021, the Regional Water Board adopted Order R2-2021-0007, NPDES Permit CA0038679. The requirements of the Order were effective starting July 1, 2021. On May 20, 2021, EBDA approved the EBDA/LAVWMA Amended and Restated Master Agreement and the EBDA/DSRSD Agreement for Zone 7 Water Agency (Zone 7) brine. LAVWMA approved the new Master Agreement on May 19, 2021. A fully executed copy of the new EBDA/LAVWMA agreement was sent to the Regional Board on June 1, 2021. The term of the new Master Agreement is through June 30, 2040. LAVWMA contracts with DSRSD to operate the LAVWMA system.

Compliance Evaluation Summary and Analysis Results / Effluent Characterization Study and Report

During this reporting period (calendar year 2025), LAVWMA conveyed 4.33 billion gallons of fully treated and disinfected secondary effluent to EBDA for dechlorination and final disposal in San Francisco Bay (Figure 1). Export flows included 2.62 billion gallons (including 34.28 million gallons of Zone 7 brine) from DSRSD and 1.70 billion gallons from City of Livermore. Flows to LAVWMA are lower in summer months due to recycling by DSRSD and City of Livermore. Discharges from LAVWMA are monitored for compliance at the EBDA outfall location under NPDES permit CA0037869.

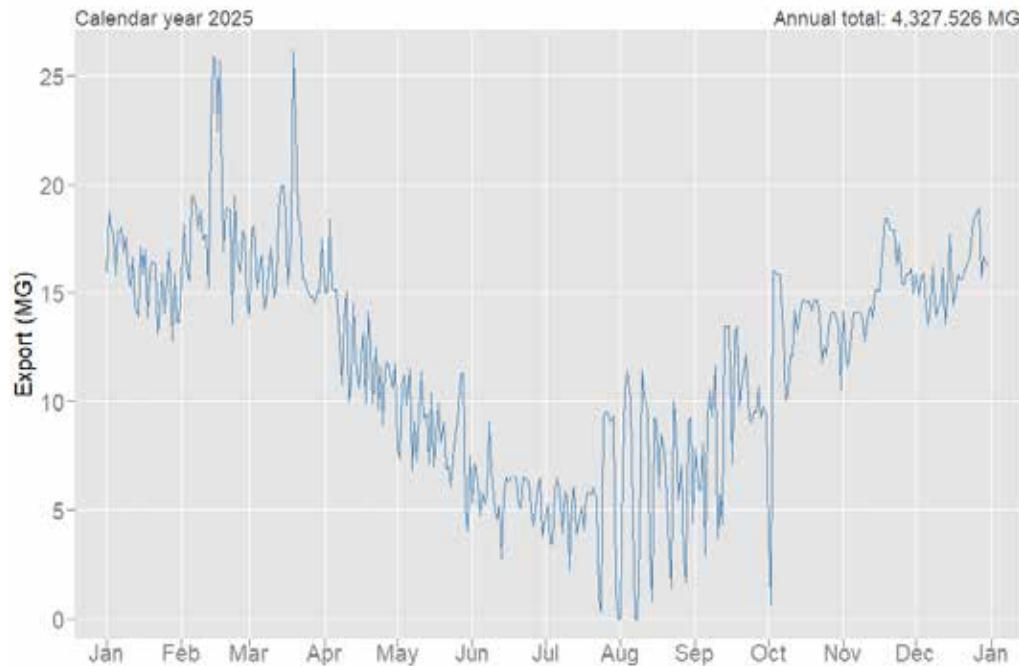


Figure 1 2025 (01-Jan through 31-Dec) Daily LAVWMA export flow in million gallons (MG)

Order R2-2021-0007 requires characterization monitoring at M-001. Staff conducted sampling at M-001 (required between November and April) on November 11, 2025. Analyses included pH, temperature, and ammonia. DSRSD performed field measurements (pH and temperature), and Caltest Analytical Laboratory performed ammonia analysis. All monitored parameters were within permitted limits. The data are presented in CIWQS and summarized in Attachment 3.

Priority pollutants were not monitored in 2025. Priority Pollutant monitoring for this permit term was conducted March 7, 2023, and data were presented in the 2023 Annual Report. Results from this testing showed total chromium was 19 µg/L at the San Lorenzo upstream location (RSW-002U). Given that only total chromium results were available, and chromium speciation is necessary to determine if a reasonable potential analysis is required for chromium VI, resampling and speciation analysis was conducted on a later date. McCampbell Analytical Laboratory performed chromium analysis from samples supplied by DSRSD collected on November 11, 2025. The chromium VI result was below the threshold for reasonable potential analysis. The data are presented in CIWQS and summarized in Attachment 3.

In August 2025, due to the very low potential for adverse effect on water quality, and the potential environmental benefits from the upgrades (e.g., automated discharge flow control; improved reliability of flow and chlorine measurements; replacement of aging infrastructure) the Water Board acknowledged that LAVWMA may proceed with testing of the San Leandro Sample Station (SLSS) outside the wet season. Such testing required discharging secondary treated wastewater to San Lorenzo Creek at M-002. Required monitoring included CBOD, TSS, pH, Chlorine (total residual), *Escherichia* Coliform, discharge duration, and discharge volume. During the November 4, 2025, discharge event, all but residual chlorine met acceptable levels. After a thorough review, DSRSD staff concluded that the elevated chlorine field residual was not indicative of residual chlorine levels in water discharged to the creek. Correspondence with DSRSD's case manager, Natlie Lee, confirmed agreement that based on the

conditions and calculations presented it was highly improbable for chlorine to have been discharged to the creek. The 30-day report submitted to the Regional Water Quality Control Board is included in Appendix 4.

List of Analyses for Which DSRSD Is Certified

The DSRSD analytical laboratory is certified by the California State Environmental Laboratory Accreditation Program to conduct monitoring (ELAP 1272; Attachments 1). Some required methods are subcontracted to Caltest Analytical Laboratory (ELAP 1664) and McCampbell Analytical, Inc. (ELAP 1644; Attachment 2). City of San Leandro Water Pollution Control Plant Laboratory (ELAP 2281) performs analyses on the EBDA combined effluent. Copies of all laboratory reports are maintained on file at DSRSD and are available for review upon request.

Pollutant Minimization Program

Testing was not performed because there were no results indicating the presence of a priority pollutant above effluent limitations during this reporting period.

Facility Report Reviews

Table 1 summarizes the status of reviews and updates of the following documents: Operations & Maintenance (O&M) Manual, Contingency Plan, Spill Prevention Plan, and Wastewater Facilities Status Report.

LAVWMA's compliance with the *Amendment of Waste Discharge Requirements for Municipal Dischargers to Update Total Residual Chlorine and Oil and Grease Requirements (Order No. R2-2023-0023)*, occurs via an agreement with EBDA (*East Bay Dischargers Authority / Livermore-Amador Valley Water Management Agency Amended and Restated Master Agreement*) to prevent an exceedance of the permitted limit at E-001. EBDA follows their Chlorine Process Control Plan to ensure compliance at E-001.

Table 1 DSRSD / LAVWMA document status review

Document	Last Review	Review Procedures	Planned Actions	Next Review
O&M Manual	2025	Plant Operators suggest O&M Manual revisions WWTP Operations Supervisors review chapter(s) of O&M and make recommendations to the Wastewater Treatment Plant Superintendent WWTP Superintendent reviews and approves any updates WWTP Operations Supervisors and DSRSD IT Staff incorporate the changes into electronic O&M	Ongoing Review of LAVWMA eOM	Ongoing

Document	Last Review	Review Procedures	Planned Actions	Next Review
Contingency Plan	2025	DSRSD Emergency Response Plan last updated June 2026 Spill Emergency Response Plan last updated June 2023 LAVWMA Wet Weather Operational Strategy last updated December 2025	Annual Review	2026
Spill Prevention Plan	2025	Sewer System Management Plan (SSMP) last updated July 2025 Spill Emergency Response Plan last updated June 2023 Spill Prevention Control and Countermeasure Plan last updated December 2025	Next SSMP update 2031; Annual Review	2026
Wastewater Facilities Status Report	2025	Wastewater Treatment and Biosolids Facilities Master Plan last updated September 2017; update began in 2025 Wastewater Collection System Master Plan last updated December 2019; update in progress, estimated completion December 2026 Projects identified in master plans or through DSRSD's ongoing operation and asset management programs, are in DSRSD's Capital Improvement Program (CIP) 10-year Plan and 2-year Budget The Capital Improvement Plan and Budget is approved by the DSRSD's Board of Directors every two years DSRSD's current CIP 10-year Plan and a 2-year Budget was most recently approved in June 2025	Complete capital projects in accordance with DSRSD's CIP 10-year Plan and 2-year Budget	2026

Wet Weather Discharge Annual Report

A summary of all wet weather and exercise discharges that occurred during the preceding wet season (November 1, 2025 to April 30, 2026) are included herein.

In 2025, no wet weather discharges occurred from the LAVWMA wet weather outfalls (M-002 and M-003). Further, there were no discharge exercises during this period, as prerequisite conditions and staff availability did not permit the activity. Discharge exercises are permitted under section 3.5 only during the wet season and when there is also a significant flow increase in San Lorenzo Creek and Alamo Canal. Therefore, no monitoring from wet weather outfall receiving waters, upstream of wet weather outfalls, occurred.

Wet Weather Facilities Management Plan

DSRSD Operations staff successfully managed wet weather flows during storm events without having to discharge into either of the two permitted shallow water outfalls: San Lorenzo Creek and Alamo Canal. Over the recent wet weather season, DSRSD staff strategically managed LAVWMA's holding basins to minimize the number of pumps running during a given billing cycle. Such an approach was based on anticipated flows from the City of Livermore and DSRSD's wastewater treatment facilities. Storage capacity is summarized in Table 1 (screenshot below) from the LAVWMA Wet Weather Operations plan.

Table 1 Existing System Storage Capacities Wet Weather Facilities Operations Plan Livermore-Amador Valley Water Management Agency		
Location	Basin Name	Available Storage Capacity (MG)
DSRSD	Holding Basin 1	1.6
	Holding Basin 2	5.6
	Holding Basin 3	6.8
	Holding Basin 4	6.7
Subtotal		20.7
Livermore	Emergency Holding Basin	15.0
	Peaking Pond	1.0
Subtotal		16.0
LAVWMA	Reservoir 1	6.0
	Reservoir 2	6.0
	Reservoir 3	6.0
Subtotal		18.0
Total	LAVWMA	54.7
Note: (1) All basins are concrete lined.		

EBDA made no request to reduce or cease LAVWMA export due to weather.

Maps & Flow Schematics

Below are maps of facility and outfall locations for San Lorenzo Creek (M-002) and Alamo Canal (M-003) along with a flow schematic including Livermore and DSRSD facilities.



Photo: (above) Aerial View of San Lorenzo Creek Outfall (M-002) and Surroundings

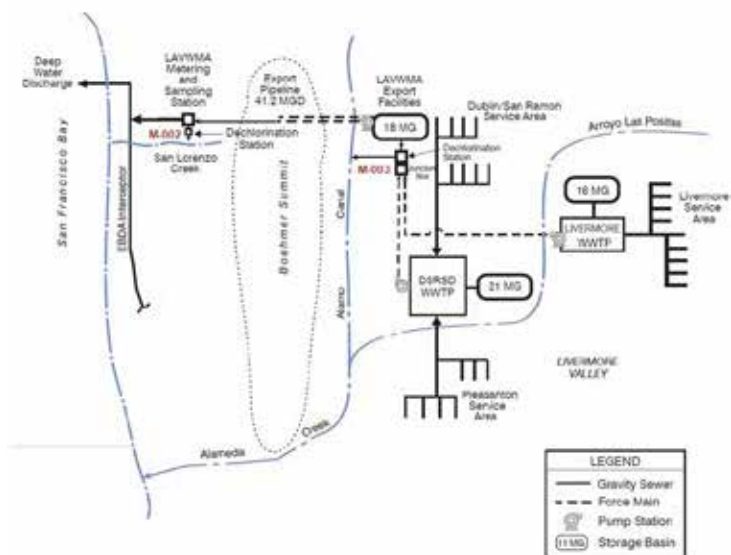


Figure: (above) Flow Schematic



Photo: (above) Aerial View of Alamo Canal Outfall (M-003) and Surroundings

Facility Performance and Maintenance

Most maintenance for LAVWMA facilities and associated equipment is tracked via a computerized maintenance management system. DSRSD electricians, instrument technicians, mechanics, and wastewater treatment operators complete regularly scheduled preventative maintenance and as-needed corrective maintenance tasks. Of the 924 preventative maintenance (PM) work orders generated in 2025, 904 were completed within an average of ~22 days (Table 2).

Table 2 Completed preventive maintenance work orders by division generated in calendar year 2025; age calculated as days from work order generation to completion; data refreshed 26-May-2026

Division	Count	Average Age (Days)
ELECTRICAL	59	39.1
INSTRUMENTATION	108	13.3
MECHANICAL MAINTENANCE	194	57.5
WASTEWATER OPERATIONS	543	9.3
Total	904	22.1

Major Maintenance Activities

The following activities were completed during 2025 (calendar year). The list identifies work performed beyond the regularly scheduled preventative maintenance.

Electrical

Jan-Mar

- Pump Station Motor #2 repaired under warranty and commissioned
- Pump Station Motor #7 sent out for overhaul
- Received stem nuts and adapter plates for actuator replacements
- Met with Alameda County regarding street widening project to locate cathodic protection equipment

Apr-Jun

- Competitively bid new washdown pump motor
- Replaced washdown pump motor feeder wires
- Completed replacement of 10 out of 17 actuators after receiving re-machined stem nuts
- Pump Station Motor #7 wired up and ready to commission
- Pump Station Motor #4 sent out for overhaul

Jul-Sep

- Junction Structure Emergency Bypass Gate Actuator replaced
- Completed replacement of 17 actuators, stem covers, and screen protectors for CIP 23-L013 LAVWMA Valve Actuator project
- Supported CIP 23-L005 SLSS Design Improvements project, assisted Operations with LOTO

Oct-Dec

- Installed new washdown pump motor
- Repaired Pump Station main gate
- Received new Pump Station motor #4

Instrumentation and Controls

Jan-Mar

- Replaced failed DSRSD combined pH sensor
- Troubleshoot Basin 3 level indicating transmitter controller
- Troubleshoot 42" export pipeline analog signal coming into PLC

Apr-Jun

- Connected Zone 7 brine flow into LAVWMA at TO2 PLC to collect data for HMI display
- Troubleshoot Chlorine and pH sensors at Junction Structure for Livermore and DSRSD sample locations
- Rebuilt Junction Structure Chlorine sensor
- Rebuilt Combined Effluent Chlorine sensor

Jul-Sep

- Worked with Operations and Lab to standardize on CL2 residual testing
- Supported CIP 23-L005 SLSS Design Improvements project:
 - o Wired up Bypass Flowmeter (FIT-1101) and CL2 Analyzer (AIT-1109)
 - o Programmed PLC for both signals and Modbus for flowmeter

Oct-Dec

- Troubleshooted SLSS local alarm panel and level transmitter for thiosulfate tank
- Supported CIP 23-L005 SLSS Design Improvements project
 - o Completed interim testing of SLSS pressure regulating valve, flow transmitter, and bypass line duckbill
 - o Supported SLSS wet weather test
- Replaced SLSS uninterruptible power supply (UPS - bump-less or continuous backup power should the main power fail)
 - o Replaced Junction Structure sample pump

Mechanical

Jan-Mar

- Normal maintenance activities.

Apr-Jun

- Completed two of three recommendations per the Air Entrapment Study
 - o Added a 6-inch vent in the EBDA tie-in vault
 - o Upsized EBDA air release valve from 4-inch to 8-inch

Jul-Sep

Completed the LAVWMA export pipeline inspection, with only one remaining section pending final inspection

Oct-Dec

Pump #4: coordinated schedule with crane company and IC&E for installation

Thiosulfate pumps: investigated priming issues and possible fix (update check valves to control air backflow)

Operations

Jan-Mar

Evaluated effects of pump sequencing on air entrainment (Jan 24 through Feb 4)

Reinstalled pump #2 and placed in lead service

Apr-Jun

Normal business operations

Jul-Sep

Tested and evaluated LAVWMA export isolation valves for leaks to ensure system integrity and reliable performance

Coordinated shutdown activities to facilitate contractor installation of multiple WEKO seals along both the pressure and gravity sides of the export pipeline

Installed, tested, and placed the new LAVWMA hypochlorite addition system into service to improve chlorine residuals and mitigate bacteriological regrowth to address EBDA concerns

Supported SLSS construction activities

Oct-Dec

Conducted SLSS partial equipment commissioning and wet weather exercise (71,235 gallons of treated effluent discharged during testing)

Tesco technician repaired the new chlorine analyzer

Replaced SLSS Calcium Thiosulfate Tank Level Indicating Transmitter

Summary

DSRSD Operations staff successfully managed LAVWMA facilities and wet weather flows in 2025.

LAVWMA and DSRSD are dedicated to continuing to provide safe, reliable, and compliant wastewater services.



STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARD

CALIFORNIA STATE



ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM

**CERTIFICATE OF
ENVIRONMENTAL LABORATORY ACCREDITATION**

Is hereby granted to

Dublin San Ramon Services District

Laboratory and Technical Services

7399 Johnson Drive

Pleasanton, CA 94588

Scope of the certificate is limited to the
"Fields of Accreditation"
which accompany this Certificate.

Continued accredited status depends on compliance with applicable laws and regulations,
proficiency testing studies, and payment of applicable fees.

This Certificate is granted in accordance with provisions of
Section 100825, et seq. of the Health and Safety Code.

Certificate No.: **1272**

Effective Date: **9/1/2024**

Expiration Date: **8/31/2026**

Sacramento, California
subject to forfeiture or revocation

Christine Sotelo, Program Manager
Environmental Laboratory Accreditation Program



**CALIFORNIA STATE
ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM
Fields of Accreditation**



Dublin San Ramon Services District
Laboratory and Technical Services
7399 Johnson Drive
Pleasanton, CA 94588
Phone: 9258752325

Certificate Number: 1272
Expiration Date: 8/31/2026

Field of Accreditation: 101 - Microbiology of Drinking Water

101.010	002	Heterotrophic Bacteria	SimPlate
101.050	001	Total Coliform P/A	SM 9223 B Colilert
101.050	002	E. coli P/A	SM 9223 B Colilert
101.050	003	Total Coliform (Enumeration)	SM 9223 B Colilert
101.050	004	E. coli (Enumeration)	SM 9223 B Colilert

Field of Accreditation: 102 - Inorganic Chemistry of Drinking Water

102.030	003	Chloride	EPA 300.0
102.030	005	Fluoride	EPA 300.0
102.030	006	Nitrate (as N)	EPA 300.0
102.030	007	Nitrite (as N)	EPA 300.0
102.030	009	Sulfate (as SO ₄)	EPA 300.0
102.095	001	Turbidity	SM 2130 B-2001
102.100	001	Alkalinity	SM 2320 B-1997
102.121	001	Hardness	SM 2340 C-1997
102.130	001	Specific Conductance	SM 2510 B-1997
102.140	001	Residue, Filterable TDS	SM 2540 C-1997
102.148	001	Calcium	SM 3500-Ca B-1997
102.280	001	UV254	SM 5910 B-2011

Field of Accreditation: 103 - Toxic Chemical Elements of Drinking Water

103.140	008	Copper	EPA 200.8
103.140	009	Lead	EPA 200.8

Field of Accreditation: 107 - Microbiological Methods for Non-Potable Water and Sewage Sludge

107.052	001	Fecal Coliform (Enumeration)	SM 9221 E-2014
107.066	001	Enterococci	SM 9230 D-2013 Enterolert
107.070	001	E. coli (Enumeration)	SM 9223 B-2016 Colilert 18

Field of Accreditation: 108 - Inorganic Constituents in Non-Potable Water

108.015	003	Potassium	EPA 200.8
108.015	005	Sodium	EPA 200.8
108.017	002	Chloride	EPA 300.0
108.017	003	Fluoride	EPA 300.0
108.017	004	Nitrate (as N)	EPA 300.0
108.017	005	Nitrate-Nitrite (as N)	EPA 300.0

As of 4/1/2026, this list supersedes all previous lists for this certificate number.
Customers: Please verify the current accreditation standing with the State.

Dublin San Ramon Services District

Certificate Number: 1272

Expiration Date: 8/31/2026

108.017	006	Nitrite (as N)	EPA 300.0
108.017	008	Sulfate (as SO ₄)	EPA 300.0
108.025	001	Ammonia (as N)	EPA 350.1
108.059	001	Turbidity	SM 2130 B-2011
108.063	001	Alkalinity	SM 2320 B-2011
108.067	001	Hardness	SM 2340 C-2011
108.069	001	Specific Conductance	SM 2510 B-2011
108.070	001	Residue, Total	SM 2540 B-2015
108.072	001	Residue, Filterable TDS	SM 2540 C-2015
108.074	001	Residue, Non-filterable TSS	SM 2540 D-2015
108.076	001	Residue, Volatile	SM 2540 E-2015
108.087	001	Calcium	SM 3500-Ca B-2011
108.174	001	Oxygen, Dissolved	SM 4500-O G-2016
108.206	001	Biochemical Oxygen Demand	SM 5210 B-2016
108.206	002	Carbonaceous BOD	SM 5210 B-2016
108.325	001	Chemical Oxygen Demand	Hach 8000

Field of Accreditation: 109 - Metals and Trace Elements in Non-Potable Water

109.625	002	Antimony	EPA 200.8
109.625	003	Arsenic	EPA 200.8
109.625	004	Barium	EPA 200.8
109.625	005	Beryllium	EPA 200.8
109.625	006	Boron	EPA 200.8
109.625	007	Cadmium	EPA 200.8
109.625	008	Chromium	EPA 200.8
109.625	009	Cobalt	EPA 200.8
109.625	010	Copper	EPA 200.8
109.625	013	Lead	EPA 200.8
109.625	014	Manganese	EPA 200.8
109.625	016	Nickel	EPA 200.8
109.625	017	Selenium	EPA 200.8
109.625	018	Silver	EPA 200.8
109.625	019	Thallium	EPA 200.8
109.625	022	Vanadium	EPA 200.8
109.625	023	Zinc	EPA 200.8
109.635	001	Mercury	EPA 245.1

As of 4/1/2026, this list supersedes all previous lists for this certificate number.
 Customers: Please verify the current accreditation standing with the State.

Page 2 of 2

Attachment 2
Sub-Contracted Laboratories Used
for LAVWMA 2025

	CalTest	McC Campbell
Nutrients	x	
Chromium		x

CERTIFICATES

CalTest Analytical	ELAP 1664
McC Campbell	ELAP 1644

Attachment 3 - LAVWMA Effluent and Receiving Water Characterization Study & Reasonable Potential Analysis (Chromium VI)**Monitoring Locations (M-001; RSW-002U; RSW-003U)**

Category	Sampling Date	Location	Sample Type	Pollutant	Laboratory	Method	Result	RL	MDL	WQO / Limit	Unit
Conventionals	11/11/2025	M-001	Grab	pH - field	DSRSD	Probe	7.05	NA	NA	6.5-8.5	Std Unit
Conventionals	11/11/2025	M-001	Grab	Temperature - field	DSRSD	Probe	23.1	NA	NA	NA	°C
Inorganics	11/11/2025	M-001	C-24	Ammonia	Caltest Analytical	EPA 350.1	21	0.5	0.065	NA	mg/L
Metals	11/11/2025	RSW-002U	Grab	Chromium (total)	McC Campbell Analytical	EPA 200.8	8.99	2	0.37	NA	µg/L
Metals	11/11/2025	RSW-002U	Grab	Chromium (VI) - field filtered	McC Campbell Analytical	EPA 218.6	ND	0.2	0.067	11	µg/L
Metals	11/11/2025	RSW-002U	Grab	Chromium (III) - calculated	McC Campbell Analytical	EPA 200.8/ EPA 218.6	8.99	Calculated	Calculated	347	µg/L
Metals	11/11/2025	RSW-003U	Grab	Chromium (total)	McC Campbell Analytical	EPA 200.8	ND	2	0.37	NA	µg/L
Metals	11/11/2025	RSW-003U	Grab	Chromium (VI) - field filtered	McC Campbell Analytical	EPA 218.6	ND	0.2	0.067	11	µg/L
Metals	11/11/2025	RSW-003U	Grab	Chromium (III) - calculated	McC Campbell Analytical	EPA 200.8/ EPA 218.6	ND	Calculated	Calculated	347	µg/L

Notes:

M-001 - a point after DSRSD and City of Livermore effluent combined and before release to EBDA pipeline (San Leandro Sampling Station)

RSW-002U - a point in San Lorenzo Creek 100 ft upstream of M-002 or if access is limited, the first accessible point upstream

RSW-003U - a point in Alamo Creek 100 ft upstream of M-003 or if access is limited, the first accessible point upstream

RL - Reporting Limit

MDL - Method Detection Limit

WQO - Water Quality Objective

November 25, 2025

Natie Lee
Environmental Scientist
San Francisco Regional Water Quality Control Boards
1515 Clay St. Suite 1400
Oakland, CA 94612

Subject: NPDES Permit CA 0038679 SLSS Testing 30 Day Report

Dear Natlie Lee,

The Livermore-Amador Valley Water Management Agency (LAVWMA) operates a 24-inch outfall facility that discharges into San Lorenzo Creek, serving to relieve high flows from the Agency's primary discharge point at the East Bay Dischargers Authority (EBDA) Interceptor. San Lorenzo Creek discharges are covered under Order R2-2023-0023 (NPDES Permit CA0038679), which permits discharges to San Lorenzo Creek ("Discharge Point 002") during peak wet weather flows after fully utilizing EBDA capacity. The permit also allows intentional discharge exercises limited to 140,000 gallons per discharge event and two events per year.

In response to construction related testing at the SLSS Facility that would require discharge to San Lorenzo Creek, on August 26, 2025, a request was granted by San Francisco Bay Regional Water Quality Control Board to deviate from R2-2023-0023 in two keys areas, time of discharge was allowed in September of 2025 thru October of 2025, and the discharge events could occur more than twice during this period for a total of up to 2 million gallons. In addition, the San Francisco Regional Water Quality Board requested a 30-Day report be submitted after the discharge event.

Included in the 30-Day report are:

- Testing Procedure: Attachment A - LAVWMA SLSS Interim Start-up Procedure 11-3-25.pdf,
 - The testing plan included more activities than were completed. Only PRV 1103 was tested on 11/04/2025.
- Inspection Report: Attachment B - 468-002 Inspection Report 11.04.2025.pdf,
 - The inspection report provided by the contractor documents the events as they occurred on 11/04/2025.
- Monitoring Results: Attachment C - SLSS Testing Monitoring Results.pdf,
- Standard Observations: Attachment D - Standard Observations 11-04-25-APEREZ.pdf, and
- Calcium Thiosulfate Dosing Calculations: Attachment E - Calcium Thiosulfate Analysis Final.xlsx

Item No. 14 - Attachment A

On November 4, 2025, testing of PRV 1103 occurred which required discharge of effluent. Once PRV 1103 opened and remained open at 10:58 am, sample collection was requested. At 11:00am the discharge reached the creek. The discharge to the creek ended at 11:11am. The total discharge volume to the San Lorenzo Creek was 71,235 gallons.

Sample results are summarized in the table below. With the exception of the total chlorine residual, no results were above the effluent limits in the monitoring table provided by the San Francisco Regional Water Quality Control Board. For more details on the laboratory analysis, see Attachment C for the SLSS testing monitoring results.

Parameter	Unit	Sample Type	Minimum Sampling Frequency	Date Collected	Time Collected	Method	Result	Qualifier	Analyzed by
Carbonaceous Biochemical Oxygen Demand 5-day @ 20°C	mg/L	C-24 ^[1]	1/Day	11/4/2025	10:57	SM 5210 B	5.9		Lab 1272 ^[2]
Total Suspended Solids	mg/L	C-24 ^[1]	1/Day	11/4/2025	10:57	SM 2540 D	4.2	DNQ	Lab 1272 ^[2]
pH	standard units	Grab	1/Day	11/4/2025	11:00	Field test	7.18		Field Staff
Chlorine, Total Residual	mg/L	Grab	Once every two hours during discharge	11/4/2025	11:02	Field test	0.12 ^[3]		Field Staff
<i>Escherichia Coliform</i>	MPN/100 mL	Grab	1/Day	11/4/2025	11:00	SM 9223B Colilert 18	1.0		Lab 1272 ^[2]
Discharge Duration	minutes	Continuous	1/Discharge	11/4/2025			12		
Discharge Volume	gallons	Continuous	1/Discharge	11/4/2025			71,235		

^[1] A single grab was collected because the single discharge event lasted less than 2 hours.

^[2] Lab 1272, Dublin San Ramon Services District's Analytical Laboratory, is CA ELAP accredited

^[3] Total Chlorine Residual captured in the field test was not representative of the water discharged to San Lorenzo Creek. Calcium thiosulfate dosing calculations supports that the water discharged to San Lorenzo Creek was sufficiently neutralized.

On November 5, 2025, Natlie Lee was notified that the field reading for total chlorine residual was above the maximum daily effluent limitation and that DSRSD staff were investigating whether the value was representative of the total chlorine residual of the water discharged at San Lorenzo Creek.

In response to the event, DSRSD performed a comprehensive review of the data related to the sampling event, SCADA data related to operations before, during and after the event, and a site inspection of the M-002 and M-001 sample lines. Based on the information gathered, DSRSD staff do not believe the total chlorine residual field result to be representative of the total chlorine residual of the water discharged

to the creek and is therefore in compliance with the total chlorine maximum daily effluent limits for the following reasons:

- The chlorine residual leaving the LAVWMA export station was 2.3 mg/L. Based on a higher chlorine residual of 3.0 mg/L, and on the strength of the calcium thiosulfate stored at the SLSS tested and verified in the lab, a dose of 0.1 gallons per minute of calcium thiosulfate would be sufficient to neutralize a total chlorine residual of 3.0 mg/L at a creek flow of 14.6 MGD which was the highest flow recorded during the event. During the discharge event the lowest calcium thiosulfate flow out of the storage tank was 1.32 gallons per minute. It is chemically improbable to have chlorine present in the presence of a dechlorinating agent.
- Due to leaving a sample valve open, a cross-connection between M-002 and M-001 existed at the time of sampling. M-001 represents effluent water not dechlorinated with calcium thiosulfate. M-002 comes from a slip stream off the main line feeding effluent neutralized with calcium thiosulfate.
- The M-002 sample line was cleaned with sodium hypochlorite prior to the discharge. The line was flushed but a chlorine residual was not taken to ensure there was no detectable chlorine residual in the line.

On November 10, 2025, the 5-Day report was submitted to Natlie and on November 17 additional information was submitted including the calcium thiosulfate dosing calculations (Attachment E). The report and supplemental information supported that the total chlorine residual measured at the sample point was not representative of the total chlorine residual of the water that was discharged to San Lorenzo Creek. The calcium thiosulfate dosing calculations demonstrate and support sufficient application of the dechlorinating agent.

If you have any questions regarding this report, please feel free to contact me at (925) 719-2997.

Sincerely,

Dan Gill
Digitally signed by Dan Gill
Date: 2025.11.25 14:44:21 -08'00'

Dan Gill
Operations Director, DSRSD

Attachment: Attachment A - LAVWMA SLSS Interim Start-up Procedure 11-3-25.pdf,

Attachment B - 468-002 Inspection Report 11.04.2025.pdf,

Attachment C - SLSS Testing Monitoring Results.pdf -the monitoring results,

Attachment D - Standard Observations 11-04-25-APEREZ.pdf

Attachment E - Calcium Thiosulfate Analysis Final.xlsx

cc: Levi Fuller, LAVWMA General Manager

Tim Lewis, Water/Wastewater Superintendent

Kristy Fournier, Deputy Director of Operations – Regulatory
Attachment 4

Diane Griffin, Operations Compliance Manager

Interim SLSS Start Up Testing and Commissioning Plan

Objectives:

- Flow test the Bypass Flow Meter (FE 1101)
 - o ~~Attachment 4.~~ Verify reading correctly at zero and non-zero flows
- Send flow through Control Valve (V 1102) test manual operation under normal operating pressure
 - o 5 LAVWMA Pump Running
- Test operation of Surge Relief Valve (PRV 1103) under opening pressure. During this step, pressures in SLSS piping will be high enough to do a visual leak check.
 - o Confirm limit switch (ZS 1103) is working when PRV 1103 opens and closes.
- Test proper air relief in SLSS manifold piping
- Visual leakage test of all newly installed piping, equipment, and appurtenances under operational flows
- Engineer to notify Contractor of the date that tests are being performed. Contractor to witness vendor testing and to support testing.
- Valve and Instrumentation O&M Manuals attached
- Sample, test and observe to ensure compliance with discharge requirements
- See clouded items in figures below:

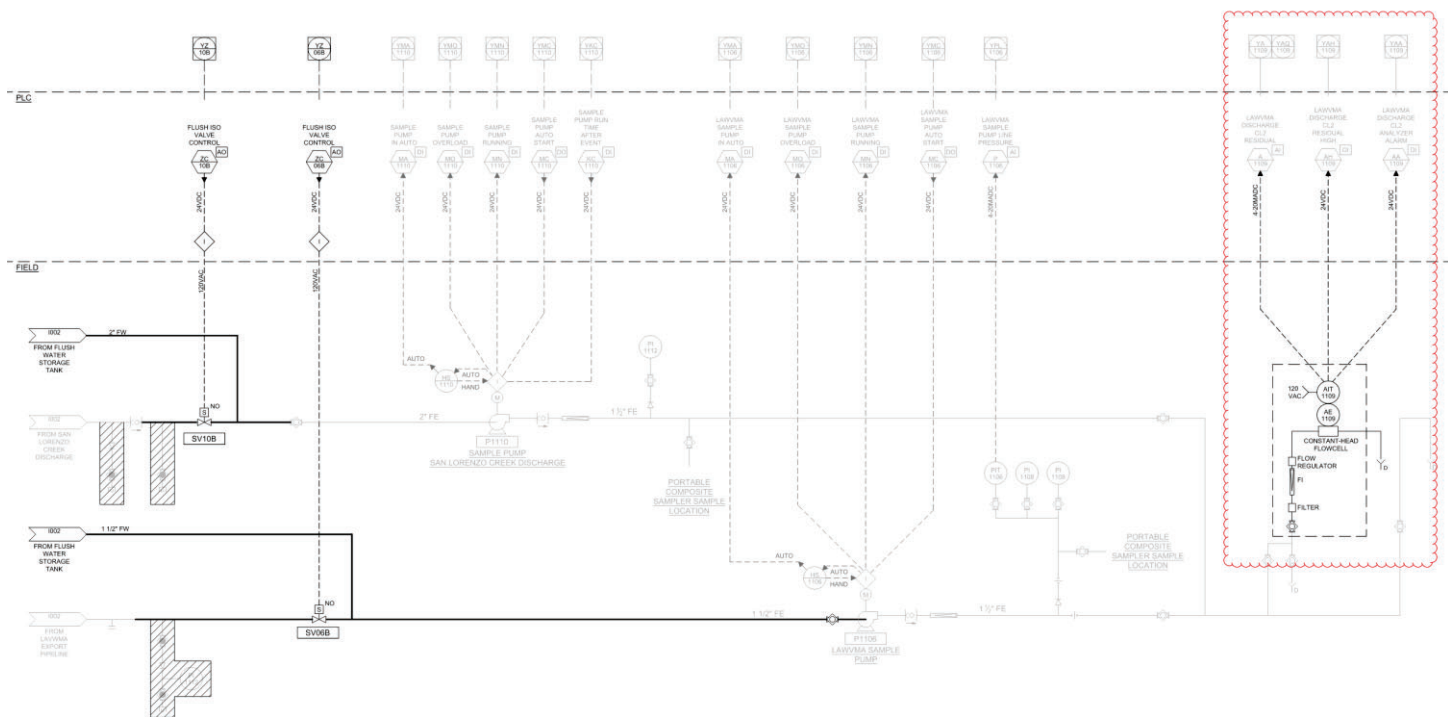
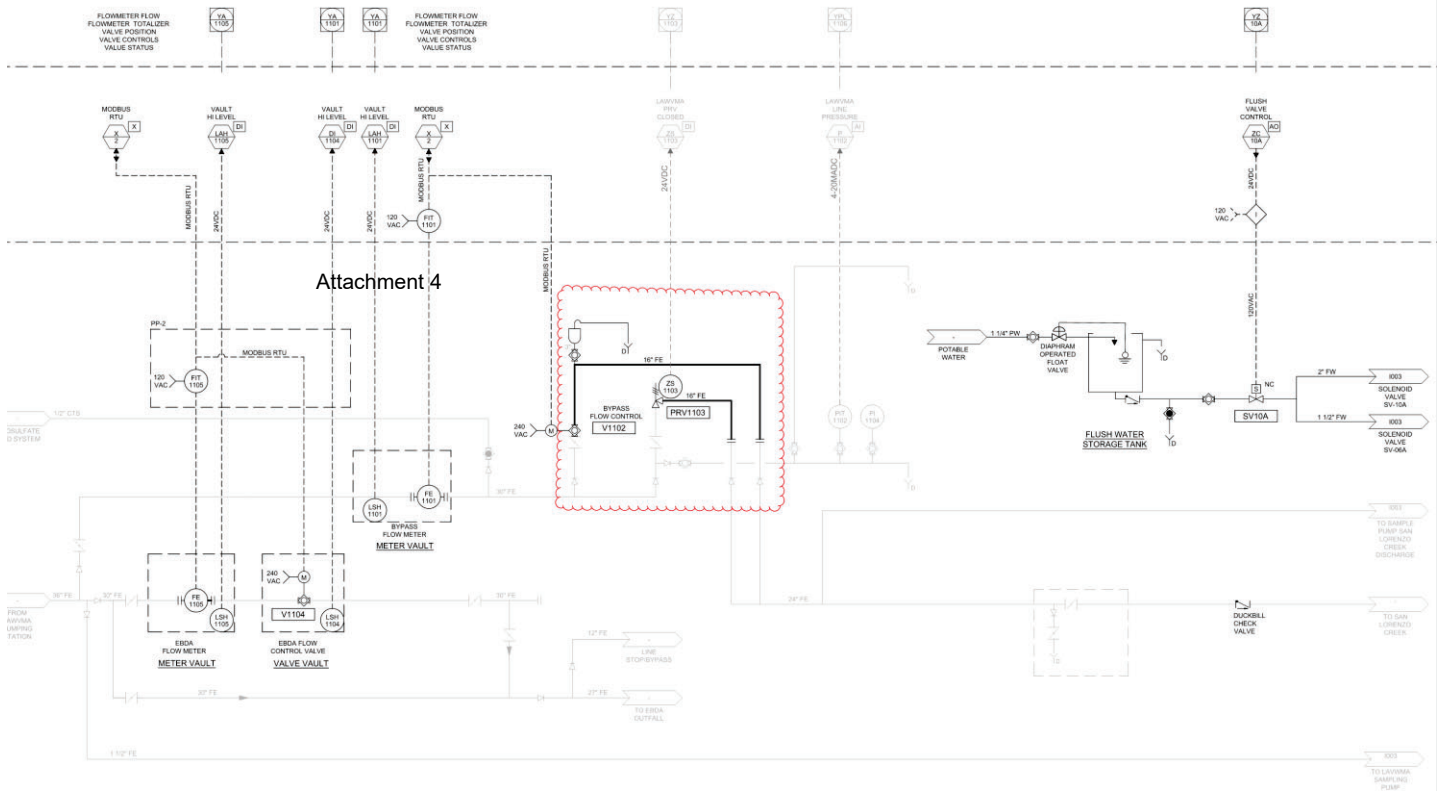


Table 1: Proposed Schedule of Testing

Date/Time	Duration	Item/Process	Staffing Action Items
10/27, 10 am	1 hour	SLSS Components upstream side Leak Testing	M&H – Witness and record results, fix minor leaks discrepancies. HSE – Witness and record results LAVWMA Ops – Confirm LAVWMA pumps running before starting test. Open isolation valve and remove tag on butterfly valve.
	Attachment 4		
11/4, 7:00 am	n/a	5 EBDA pump running	DSRSD – confirm flow needed for testing is ready – Send Email to HSE
11/4, 8:00 am	15 minutes	DSRSD/HSE/M&H/ MOV Vendor Show up on site	DSRSD - Remove Lock out tag out on EBDA valve and on butterfly valve.
	45 minutes	V 1102 Vendor inspection V 1102 Local set setpoints	Control Tech rep – Perform installation inspection of V1101 Adjust setpoints locally in actuator Confirm to M&H and HSE that installation is approved
11/4, 8:45 am	1-1.5 hours	Open 30” isolation Pinch EBDA valve Build pressure for PRV testing	LAVWMA Ops – Operate and monitor Systems M&H/HSE look for leaks in both valves as pressure builds
11/4, 9:45 am or 10:15am	30 minutes	PRV Testing	DSRSD Ops – Operate Systems DSRSD – take samples (for CBOD, TSS, pH, Cl, <i>E. coli</i>) when flow to creek starts and transport to lab

Item No. 14 - Attachment A

Attachment 4			DSRSD – Monitor Outfall conditions during discharge. Record flow and duration of discharge. M&H – Witness and record results HSE – Witness and record results
11/4, 10:15 am or 10:45 am Note: This will take place after PRV test is finished	30 Minutes	V1101 Training	Control Tech rep – inform LAVWMA Ops about operations of V1101
11/4, 10:45 am or 11:15 am Note: Conducted when all the above are finished	30 minutes	V1102 Testing	DSRSD Ops – Operate Systems DSRSD – take sample (Cl) when flow to creek starts and transport to lab DSRSD – Monitor Outfall conditions during discharge. Record flow and duration of discharge. M&H – Witness and record results HSE – Witness and record results

Interim SLSS Start Up Testing Procedure:

Valve Upstream Leak Testing

- Planned to perform on Monday 10/27
 - o HSE, M&H to witness
 - o M&H to fix minor issues and schedule to fix major issues
 - o ^{Attachment 4} LAVWMA Ops to operate valves and equipment.
- Make sure flow is pumped through EBDA pipeline
- LAVWMA Ops remove lockout/tagout and open 30" isolation valve and butterfly valve on PRV.
- Check for leaks on upstream site.
 - o In the event of minor leakage, M&H shall try to fix day of testing. If that is not possible, LAVWMA Ops to isolate SLSS and M&H arrange to come back as soon as possible to address.
 - o In the event of major leakage: stop testing. LAVWMA Ops to isolate SLSS and M&H arrange to come back as soon as possible to address.
 - o Once deficiencies are addressed remove isolation from SLSS and check again for leaks on the upstream side of the valves.
- Isolate SLSS until ready to do start up testing by closing 30" isolation valve.

Before Bypass Testing:

- Build level in the basins at LAVWMA to provide sufficient volume for required flow tests
- Confirm Flow Meter (FE 1101) is powered up and reporting to HMI
- Confirm electrical actuator for control valve (V1102) is powered and functional
- Valve vendor from Control Tech for V1102 to perform installation inspection for valve
- Valve vendor to confirm and set local set points on the electrical actuator
- Dry test control valve (V1102) operation through all open and closed positions using local actuator controls and manual handwheel.
- Open 30" isolation valve in street.
- Before starting PRV testing Start thiosulfate pumps (1 in hand and 1 in auto).

Bypass Testing

PRV Test

- Use normal flow conditions.
- Pinch EBDA valve (V 1104) to 10% open position
 - o Monitor Pressure Transmitter PIT 1102 and Pressure Gauge PI 1104 for rising pressure
 - o Under normal conditions it should be 1 to 1.5 hours to build pressure.
 - o If pressure does not build to 50 psi (approximately) in this time period, then LAVWMA Ops to manually close EBDA control valve.
- Tell FE 1101 to totalize flow
- Confirm Thiosulfate pump turns on slightly before PRV opens
 - o It is currently set to 35 psi – per meeting on 10/30/2025
- Record pressure at Surge Relief Valve (PRV 1103) as it begins opening
 - o Verify switch ZS1103 indicates PRV1103 is open (not fully closed) on the HMI
 - o If PRV opens too soon or does not open at set point (+/- 2 psi), testing stops and M&H to fix deficiencies as soon as possible maximum 5 calendar days.
 - o If PRV does not open during testing the contingency will be to relieve pressure by opening either V1102 or V1104.
- Collect Sample when PRV opens
- Run bypass sample pump (P1110)
 - o Sample bypass chlorine residual with Analyzer (AIT 1109)
- Let run for 10 to 15 minutes for pressure and flow to stabilize
- Visually inspect all modified or new piping in the SLSS for any leaks, record with photographs.
 - o In the event of minor leakage, M&H shall try to fix day of testing. If that is not possible, LAVWMA Ops to isolate SLSS and M&H arrange to come back as soon as possible to address.
 - o In the event of major leakage stop testing, LAVWMA Ops to isolate SLSS and M&H arrange to come back as soon as possible to address.
- Return EBDA valve (V 1104) to fully open
- Verify Surge Relief Valve (PRV 1103) closes
- End test
- After PRV testing is complete swap which thiosulfate pump is in hand and in auto prior to starting the V1102 testing.
- Record total flow for test

Control Valve Test

- Tell FE 1101 to totalize flow
- Pinch EBDA valve (V 1104) to 10% open position
- Opening of Control Valve (V 1102)
 - o Fully open Control Valve (V 1102) locally using electrical actuator.
 - o Take a sample when valve is opened
 - o Perform vendor flow testing concurrently with LAVWMA testing
 - o Run for 15 minutes to obtain steady flow conditions.
 - o Confirm flow reading of Flow Meter (FE 1101) on local transmitter and HMI.
 - o If V1102 does not open during testing the contingency will be to relieve pressure by opening V1104.
- Run bypass sample pump (P1110)
 - o Sample bypass chlorine residual with Analyzer (AIT 1109)
- After 15 minutes record flow
- Return EBDA valve (V 1104) to fully open
 - o Run for 15 minutes to obtain steady flow conditions.
- Close Control Valve (V1102)
- End test
- Record total flow for test

After testing

M&H to receive vendor startup reports and submit to HSE

HSE – provide recorded data provide to LAVWMA and DSRSD

LAVWMA/DSRSD will provide discharge report to Regional Board within 30 days

Inspector's Daily Record of Work Progress

Project Title:	LAVWMA- SLSS Improvements	Date	11/4/2025						
Project No.:	468-002	Day	S	M	T	W	Th	F	S
Client:	LAVWMA	Weather	Sunny	Clear	Overcast		Rain	Snow	Storm
Contractor:	McGuire	Temperature	<32	32-50	50-70	70-85	85-100	>100	
Project Manager:	Bill Slenter	Wind	Still	Moderate	High				
Type of Work:	Water-Improvements	Humidity	Dry	Moderate	Humid				

Attachment 4

Contractor's Work Force:

M&H - Project Manager: 1 James

Equipment in use: Equipment *Idle: n/aMaterials or Equipment Delivered: n/aNon-Conforming Materials or Work (describe reason for non-conformance) n/aField Problems (which could result in delay or claim) n/aQuantities of Pay Items Placed: n/a

Summary of Contruction Activities:

Conducted Interim Startup Testing. Testing notes attached.

PRV 1103 Testing Passed and can be used in for emergency bypass during this wet weather season.

Confirmed that FE 1101 records flow. Confirmed Open Switch ZS 1103 records when PRV 1103 opens.

M&H did not schedule V 1102 vendor for the correct date. As a result V 1102 was not tested. This will serve as emergency valve for this season and further testing during this period will be discussed.

Issue with Chlorine Analyzer AIT 1109 not receiving flow discovered after testing finished.

Follow-Up Inspections of Previous Reported Deficiencies: n/a

1 Field Office.

2. Hydrosience Eng.Office.

Inspector: Kyle Fooks

LAVWMA SLSS Interim Test Notes 11/4/2025:

- 4 Pumps running instead of 5 pumps.
 - o Due to PGE rate hike from running 5 pump LAVWMA decided to run 4 pumps.
 - o Flow reading from LAVWMA Export PS is 19.3 MGD.
 - o LAVWMA line pressure is 9.5 PSI at time of flow reading
- M&H communicated to CTI Control Tech (Vendor for V 1102) the wrong date for testing.
 - o The decision was made to test just PRV 1103
 - o No checks were performed on V 1102
- DSRSD Ops cleaned out bypass sample pump discharge cone prior to testing.
- DSRSD Ops performed prechecks at vault for V1104 as it was anticipated that the valve will need to be manually closed to build enough pressure with 4 pumps running.
- DSRSD Ops opened the 30" isolation valve in Lewelling Blvd and removed lock-out tag-out on all SLSS vales.
- 1 thiosulfate pump turned on in hand to pre-charge pipeline before starting test
- No visual indicator on valve for when it opens, M&H contacted vendor to inquire about how to confirm if opened. It is confirmed that there will be some noise with flow passing through the valve and piping. Need to confirm with open switch and listen for flow through piping.
- Start pinching V 1104 at 9:37 am. Paused at 9:40. Started pinching again at 9:50 am.
- Due to time to build pressure it was decided in the field to build pressure to 35 psi, confirm thiosulfate pump set in auto mode turns on, then manually close V 1104 to fully closed.
- At 10:30 am, 35 psi is reached. Thiosulfate pump confirmed turned on automatically.

- At 10:32, V1104 start to manually close.
- At 10:43, PRV 1103 initially cracks open at line pressure of 48 psi. PRV closes again as initial opening of the valve relieves the pressure in the line. Open switch ZS 1103 triggers.

Attachment 4

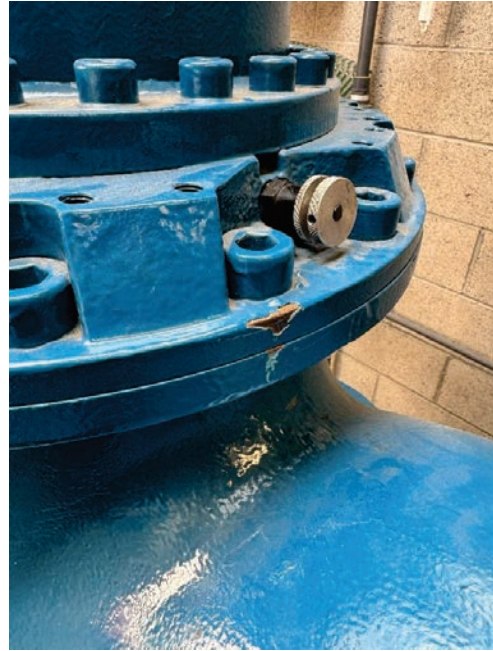
- At 10:50 PRV 1103 opens at 51 psi. Open switch ZS 1103 triggers.
 - o Pressure builds to 60 PSI at 10:53 am before dropping and PRV 1103 closes again at 10:54. Flow reading at this point is 17,457.14 gal
- At 10:58 am PRV 1103 opens at 52 psi and remains open. Open switch ZS 1103 triggers confirming open.
- Sample is directed to be collected.
- Valve and piping is visually inspected for leaks. No leaks observed.
- At 11:00 am receive notification that discharge started at San Lorenzo Creek. Flow total is 22,112.58 gal reading from FE 1101.
- Pressure builds to 70.4 psi noted at 11:08 am
- Open V 1104 at 11:11 am. Totalizer stops increasing at 11:12 am with total flow reading 115,412.07 gal.

Deficiencies noted after testing:

1. Chlorine Analyzer AIT 1109 – was not getting flow through it. It is suspected that the flow switch on the inlet end of the analyzer may be blocking flow. It is unknown why. This analyzer comes preassembled and has been in use for about a month. After starting use there were issues with the probe due to air in the EBDA line. M&H is ok with DSRSD removing flow switch until Tesco work if that is the solution to providing flow to analyzer. HSE to follow up with DSRSD on condition of Analyzer and next steps.

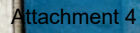
Item No. 14 - Attachment A

Visual inspection of PRV 1103 show some damage to exterior coating of the valve. Recommend this is touched u before project acceptance. Valve otherwise visually looks in good condition.



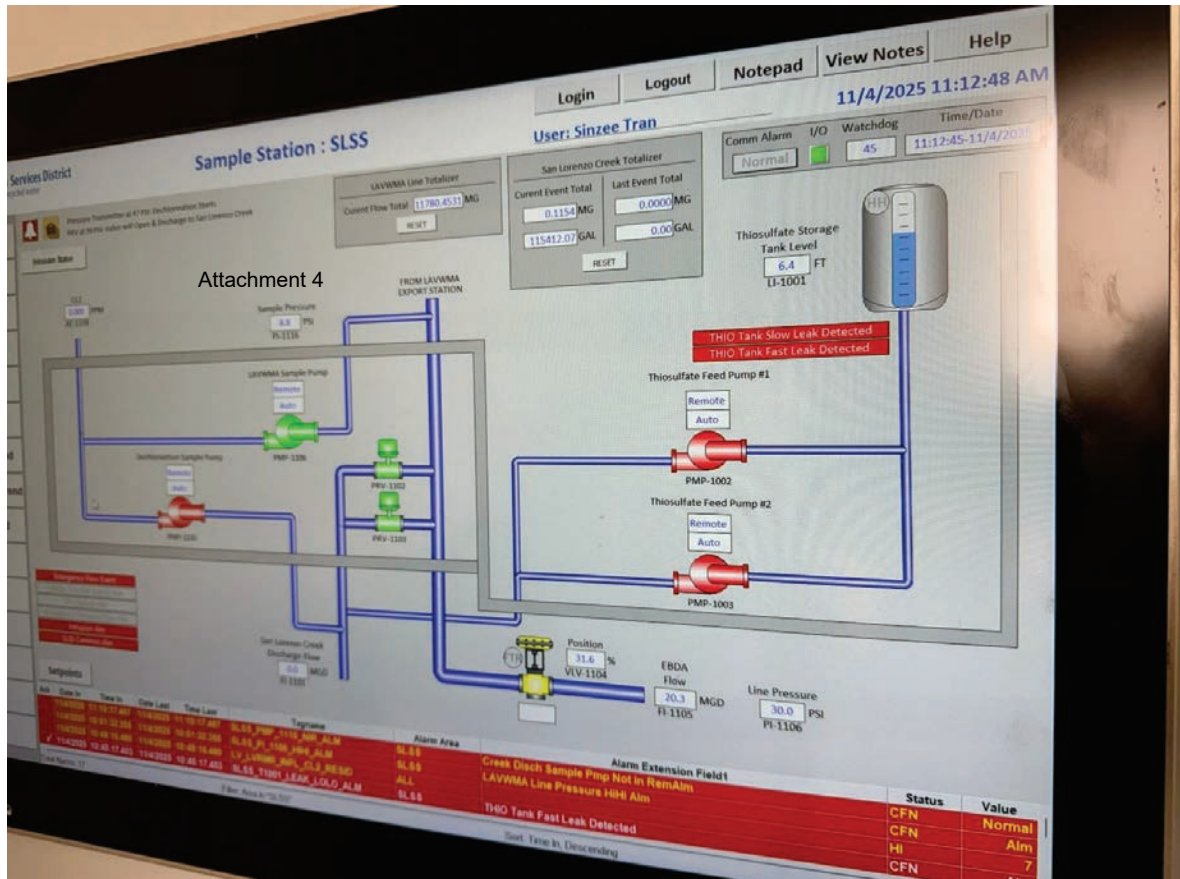
No leaks observed in piping.





The image shows a SCADA/HMI interface for a water treatment plant. The top navigation bar includes buttons for 'Login', 'Logout', 'Notepad', and 'View Notes'. The main display area features a process flow diagram with blue pipes, green valves, and red pumps. Key data points include 'Sample Station : SLSS', 'User: Sinzee Tran', and various flow and level measurements. A large red alarm banner at the bottom right reads 'THIO Tank Slow Leak Detected' and 'THIO Tank Fast Leak Detected'. The interface also features a 'Thiosulfate Storage Tank Level' gauge and two 'Thiosulfate Feed Pump' controls.

HMI showing total flow for PRV 1103 Testing





Dublin San Ramon
Services District

Water, wastewater, recycled water

Dublin San Ramon Services District Laboratory
7399 Johnson Drive, Pleasanton, CA 9458

ELAP Certificate #: 1272

Sample Point	M-002	Sample ID	AA85053	Collected:	11/04/2025 1056
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Analysis	Result	Unit	RL	MDL	DF	Qualifier	Analysis Date/Time	Analyst	Method Reference
CHLORINE_FIELD	0.12	mg/L	0.10	0.068	1		11/04/2025 1102	KM	SM 4500-Cl-G
E-COLI_QUANTITRAY	Attachment 4 1.0	MPN/100 mL	1.0	N/A	1		11/04/2025 1303	LMN	9223B Colilert18
PH_FIELD	7.18	Std Unit	N/A	N/A	1		11/04/2025 1100	KM	SM4500-H+ B
TEMP_FIELD	23.7	deg C	N/A	N/A	1		11/04/2025 1100	KM	SM 2550 B

Sample Point	M-002	Sample ID	AA85054	Collected:	11/04/2025 1057
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Analysis	Result	Unit	RL	MDL	DF	Qualifier	Analysis Date/Time	Analyst	Method Reference
CBOD	5.9	mg/L	2.0	2.0	1		11/05/2025 1110	EJD	SM 5210 B
TSS	4.2	mg/L	4.5	1.18	1	DNQ	11/06/2025 1431	IC	SM 2540 D

Abbreviation and Qualifier:

ND	- Analyte detected below the MDL
DNQ	- Analyte detected above the MDL but below the Reporting Limit. The reported concentration is an estimated value.
RL	- Reporting Limit
MDL	- Method Detection Limit
DF	- Dilution Factor

11/19/2025

Heidi Birdsell
Laboratory Supervisor

Date

Dublin San Ramon Services District
WWTP/Laboratory
7399 Johnson Drive, Pleasanton, CA 94588

Chain of Custody Record
Storm Discharge - Effluent Monitoring
Lab Login Record File No. 251104007 page 1 of 2

Company Name: Dublin San Ramon Services District										Analysis Request					For Lab Use Only	
Mailing Address: 7399 Johnson Drive, Pleasanton, CA 94588																
Sample(s) Collected by: <i>Kapil Mohan</i>		Sampling		Container		Preservative		Matrix		# of bottles collected	E. coli (Coliort-18)	Field pH	Field Temp	Attachment 4		Labworks Sample ID
		Date	Time	Comp or Grab	120 mL Flip-Bottle	1L Plastic	Sodium Thiosulfate	None	Wastewater							
Sample Location / Identification																
M-002		11-4-25	1056	G	X		X			X				Deliver to lab within 6 hours of sampling.		MAB5053
<i>M-002 (pH & Temp. only)</i>		11-4-25	1100	G								7.18	23.7C			MAB5053
Relinquished by: <i>Kapil</i>		Received by: <i>[Signature]</i>				Date: 11/4/25		Time: 1151		Temperature at Receipt: IR#5 SN 210909060 CF:-0.3°C Observed (°C): <u>12.1</u> Ice? <u>(Y)</u> / N Corrected (°C): <u>11.8</u>						
Relinquished by:		Received by:				Date:		Time:								
Field Information:										Field Chlorine (measure every hour)						
Sample Start Time: <u>1055</u> Sample End Time: <u>1056</u>										Chlorine Residual: <u>0.12</u> mg/L Sample Time: <u>1102</u>						
Discharge Duration: <u>TBD</u> Hours <u>TBD</u> minutes										Chlorine Residual: <u>N/A</u> mg/L Sample Time: <u>N/A</u>						
Discharge Volume: <u>TBD</u> Gallons										Chlorine Residual: <u>N/A</u> mg/L Sample Time: <u>N/A</u>						
<i>* By District Eng (Sanya) 11/4/25</i>										Chlorine Residual: <u>N/A</u> mg/L Sample Time: <u>N/A</u>						

Item No. 14 - Attachment A

Dublin San Ramon Services District

WWTP/Laboratory

7399 Johnson Drive, Pleasanton, CA 94588

Chain of Custody Record

Storm Discharge - Effluent Monitoring

Lab Login Record File No. 25110407

page 2 of 2

DSRSD Lab - 095
Revision: 4
Effective: 08/27/2025

Company Name: Dublin San Ramon Services District										Analysis Request										For Lab Use Only Labworks Sample ID									
Mailing Address: 7399 Johnson Drive, Pleasanton, CA 94588																													
Sample(s) Collected by: <i>Kapil Moha</i>		Sampling		Container		Preservative		Matrix																					
		Date	Time	Comp or Grab	120 mL Flip-Bottle	1L Plastic	Sodium Thiosulfate	None	Wastewater	Soil	Drinking Water	# of bottles collected	CBOD (1L every 2 hours)	TSS (1L every 2 hours)	Attachment 4														
Sample Location / Identification																													
M-002		11.4.25	1057	G	X			X		X		2	X	X					PA85054										
M-002		11.4.25	1107	G	X			X		X		2	X	X					PA85055 ***										
Relinquished by: <i>[Signature]</i>		Received by: <i>[Signature]</i>				Date: 11/4/25		Time: 1151		Temperature at Receipt: IR#5 SN 210909060 CF:-0.3°C Observed (°C): 17.9 Ice? (Y) N Corrected (°C): 17.6																			
Relinquished by:		Received by:				Date:		Time:																					
Field Information: Sample Start Time: <u>1056</u> Sample End Time: <u>1057</u> Discharge 1: Duration: <u>TRD*</u> Hours <u>TRD*</u> minutes Volume: <u>TRD*</u> Gallons Discharge 2: Duration: _____ Hours _____ minutes Volume: _____ Gallons										Field Chlorine (measure every hour) Chlorine Residual: <u>0.12</u> mg/L Sample Time: <u>1102</u> Chlorine Residual: <u>N/A</u> mg/L Sample Time: <u>N/A</u> Chlorine Residual: <u>N/A</u> mg/L Sample Time: <u>N/A</u> Chlorine Residual: <u>N/A</u> mg/L Sample Time: <u>N/A</u>										Comment: 2- point field composite <i>11/4/25</i>									

* TRD by District Eng. (Sonya) 11/4/25

*** Extra Sample - Analysis not required

Attachment D

LAVWMA Wet Weather Discharge Monitoring Requirements

Date: Nov. 4, 2025

Discharge Monitoring

M002/M003 Monitoring

Parameter	Unit	Sample Type	Frequency	Limit*	Responsible Party	Observed Value
CBOD	mg/L	C-24	1/discharge	40 mg/L	EC	See analytical result
TSS	mg/L	C-24	1/discharge	45 mg/L	EC	See analytical result
Oil & Grease	mg/L	Grab	1/discharge	20 mg/L	EC	N/A
pH	Std. Unit	Grab	1/discharge	6.5-8.5 s.u.	EC	7.18
Total Residual Chlorine	mg/L	Grab	once every 2 hrs	0.0	EC	0.12 mg/L
E. coli	MPN/100ml	Grab	1/discharge	320	EC/LAB	See analytical result
Discharge Duration	hrs and min	Continuous	1/discharge	--	OPS	Obtain from Ops.
Discharge Volume	gallons	Continuous	1/discharge	--	OPS	Obtain from Ops.

*Limits taken from Order R2-2021-0007, NPDES Permit CA0038679 Section 4 - Effluent Limitations

RSW-002D/003D Monitoring

Parameter	Unit	Sample Type	Frequency	Limit	Responsible Party	Observed Value
Standard Observations	-	-	1/discharge	--	EC	
pH	std unit	Grab	once/permit term			
Temperature	deg C	Grab	once/permit term			
Salinity	ppt	Grab	once/permit term			
Ammonia, Total	mg/L as N	Grab	once/permit term			
Dissolved Oxygen	mg/L	Grab	once/permit term			

Characterization Study

M001 Monitoring

Parameter	Unit	Sample Type	Frequency	Limit	Responsible Party	Observed Value
pH	std unit	Grab	1/year	6.5 to 8.5	EC	N/A
Temperature	deg C	Grab	1/year	--	EC	N/A
Ammonia, Total	mg/L as N	C-24	1/year	--	EC/LAB	N/A
Priority Pollutants	ug/L	C-24	once/permit term			

Note:

M001 - A point after effluent from the Dublin San Ramon Services District Wastewater Treatment Plant and the City of Livermore Water Reclamation Plant effluent are combined and before release to the EBDA pipeline (Discharge Point 001).

M002 - A point at which dechlorination has taken place, just prior to discharge to San Lorenzo Creek (Discharge Point 002).

RSW-002D - A point in San Lorenzo Creek 100 feet downstream of Discharge Point 002 or, if access is limited, at the first accessible point downstream. once/permit term parameters will be analyzed at a later date w/in the 5-year term of the permit

Attachment 4

Item No. 14 - Attachment A

RSW-002D/003D Monitoring

Parameter	Unit	Sample Type	Frequency	Limit	Responsible Party	Observed Value
Standard Observations	-	-	1/discharge	--	EC	
Floating or Suspended Materials			1/discharge	--	EC	See Observation 1
Discoloration and Turbidity			1/discharge	--	EC	See Observation 2
Odor			1/discharge	--	EC	See Observation 3
Beneficial Water Use*			1/discharge	--	EC	See Observation 4
Hydrographic Condition			1/discharge	--	EC	See Observation 5
Weather Conditions			1/discharge	--	EC	See Observation 6

Obs. 1: Floating or Suspended Materials

Creek had various floating materials (twigs/branches/leaves). Scums and foams were present prior to and during discharge.

Obs. 2: Discoloration and Turbidity

Water had a murky green coloring, but surprisingly clear (1-1.5 ft depth). During discharge, the visibility was reduced significantly and made the water more turbid.

Obs. 3: Odor

No odor was picked up, either prior to or during discharge.

Obs. 4: Beneficial Water Use

Various water fowl were present prior to and during discharge. A sord of mallards (> 40) approximately 300 ft upstream of discharge point were observed and later remained unperturbed during discharge, and a raft of mallards (about a dozen) were observed approximately 200 ft downstream of the discharge point and moved away from the discharge once it commenced. Some fish +

Obs. 5: Hydrographic Condition

1st Tide - 4:33 AM - 1.59 ft
 2nd Tide - 10:39 AM - 8.31 ft
 3rd Tide - 5:34 PM - -0.74 ft
 4th Tide - 11:59 PM - 6.41 ft

data from tideschart.com: see link
<https://www.tide-forecast.com/locations/San-Leandro-M4> +

Obs. 6: Weather Conditions

Weather observations from National Weather Service. Closest NOAA weather location is Hayward Airport (1.98 Miles as the crow flies to RSW-002D).

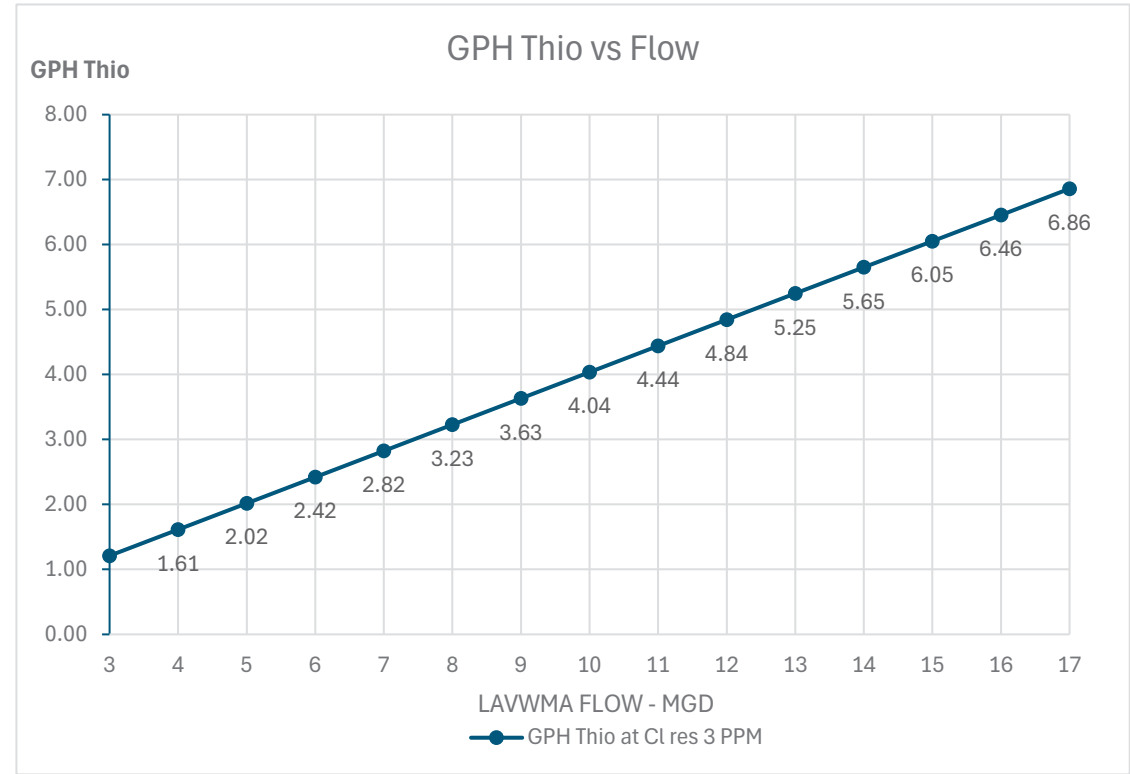
Mon, Nov. 3 - Wind spead avg. 4.1 mph (NW), 66° F High, 53° F Low, 0.00 in. precipitation
 Sun, Nov. 2 - Wind spead avg. 3.0 mph (W), 74° F High, +

Item No. 14 - Attachment A
Attachment E

User input cell

Chlorine Residual	LAVWMA EXPORT Q - MGD	Lbs Chlorine	Thiosulfate SP GPH	Tote Volume	Supply Days
3	14.6	365.29	5.89	0.00	0.00
			GPM		
			0.10		

24.20%	% Thiosulfate
1.28	Attachment 4 Specific Gravity



Attachment 4

Item No. 14 - Attachment A

Hach DR 300 SN 19090A002512			
Hach DPD LR Spec Check Lot: A5086 (note: if lot number doesn't match, confirm acceptance range below)			
	Std 1 (mg/L)	Std 2 (mg/L)	Std 3 (mg/L)
Result	0.22	0.93	1.6
Acceptance Range (per CoA)	0.22±0.09	0.93±0.10	1.60±0.14
HACH DPD Chlorine Lot/Exp.: 5204			
Timer/Exp.: 210250719			
Date Analyzed: 11/8/2025			
Analyst: EJD			
	Location	Hypochlorite	LAVWMA
Sample Information	Sample ID	--	NA
	Sampled Date	9/8/2025	11/5/2025
	Sampled Time	--	1255
Ca Thiosulfate Density	Sample Volume for Density (mL)	--	10.0
	Sample Weight for Density (g)	--	12.8
	Density, g/mL	--	#VALUE!
Analysis	Solution A (per WI-027) Preparation	1 mL of bleach diluted to 200 mL of DI water	
	Solution B (per WI-027) Preparation	1 mL of Solution A diluted to 100 mL of DI water	
	Solution C (per WI-027) Preparation	1 mL of Ca Thiosulfate diluted to 1000 mL of DI water	
	Sample Dilution Factor	--	1000
	Solution B Chlorine Residual, mg/L (Expected 4-8 mg/L)	5.6	--
	Solution A + Solution C (per WI-027)	1 mL of Solution A and 1 mL of Solution C diluted to 100 mL of DI water	
	Final Dilution Factor (Solution A+C)	--	100
	Chlorine after Hypo added (Solution A+C), mg/L	--	2.5
	Chlorine dechlorinated, mg/L	--	#VALUE!
	Dilution factor, total	--	100,000
Calcium Thiosulfate Strength	v/v, ppm	--	310,000
	w/w, ppm	--	242,188
	w/w %	--	24.2
Comments	DPD Chlorine HR Secondary Standards #A5139 Exp. 05/2027. Stnd 1 True Value=2.4±0.2 , Stnd 1 Result=2.6 , Stnd 2 True Value=4.0±0.3 Stnd 2 Result=4.3, Stnd 3 True Value= 7.0±0.6 Stnd 3 Result=7.2		
	Top Loading Balance SN C014256251		



Livermore-Amador Valley Water Management Agency

July 3, 2026

Mr. Robert Larsen
State Public Assistance Officer
California Governor's Office of Emergency Services
3650 Schriever Avenue
Mather, CA 95655
ATTN: FEMA-4699-DR-CA

SUBJECT: Request for Assistance-PW 1648 Obligation Status
Disaster: FEMA-4699-DR-CA (2023 Feb-April Storms)
Project #734124, Cal OES ID: 001-UVV68-00
Applicant: Livermore Amador Valley Water Management Agency

Dear Mr. Larsen,

On behalf of the Livermore Amador Valley Water Management Agency (LAVWMA), I am following up on numerous inquiries our consultant has made to your office and to Mr. Robert Fenton of FEMA Region IX, regarding the pending obligation of Federal Emergency Management Agency (FEMA) funding for a completed disaster recovery project (FEMA DR-4699, Project #734124, PW #1648). We respectfully request your assistance in facilitating the obligation of these funds, which remain outstanding despite the project's completion and our repeated efforts to obtain an update.

During the February–April 2023 storm events, severe erosion at Arroyo Mocho Creek exposed LAVWMA's 27-inch Livermore Interceptor effluent pipeline, creating a significant risk of pipeline failure and potential environmental discharge. To address this immediate threat, LAVWMA completed a trenchless replacement of approximately 700 feet of pipeline and one manhole, restoring the facility to its pre-disaster condition and function. Construction was completed on July 31, 2024, and funded by LAVWMA's General Fund with the expectation of reimbursement through FEMA's Public Assistance Program.

Following extensive coordination among FEMA, Cal OES, and LAVWMA over the past three years, Project Worksheet (PW) 1648 was developed in the amount of \$5,409,972.84. The PW was approved and signed by FEMA, Cal OES, and LAVWMA in September 2025. All compliance requirements have been satisfied, and all requested supporting documentation has been submitted through the FEMA Grants Portal.

Although the project has been fully constructed and approved at both the Regional and State levels, FEMA funding has not yet been obligated. After nearly a year in Headquarters-level Large Project review in Washington, D.C., the FEMA Grants Portal now indicates that the project has been returned for rework because the Large Project Notification (LPN) was sent back for revision. The status history notes that the mitigation information was reset, with the following comment: *"Sent back at the request of the R9 Closeout Branch Chief to revise the project as a capped project."*

Item No. 14 - Attachment B

LAVWMA does not anticipate requesting a version for this PW if it is approved and obligated as written. Once the project is obligated, LAVWMA will be able to close out the entire disaster. Our understanding is that capping a PW typically applies to improved or alternate projects, which does not appear to be the case here. Accordingly, we are requesting clarification as to why the project is being revised as a capped project.

LAVWMA has expended significant local funds to complete this critical infrastructure repair and continues to await federal obligation for reimbursement. Given the duration of the review process and fiscal impact on our agency, we respectfully request your assistance in obtaining an update from FEMA regarding the status of this review and, if possible, facilitating its timely completion and obligation.

We recognize the substantial demands currently facing FEMA due to ongoing disaster recovery efforts nationwide, as well as broader federal budget constraints. Nevertheless, the prolonged delay in obligating this approved project has created uncertainty regarding reimbursement of significant local expenditures. Any assistance Cal OES can provide in elevating this matter and helping to advance the review process would be greatly appreciated.

Thank you for your time, consideration, and continued support of our community. If you have any questions or require additional information, please do not hesitate to contact me at (707) 373-7030 or our consultant, Mr. Masoud Kermani, at (415) 328-9446.

Sincerely,



Levi Fuller
General Manager
Livermore Amador Valley Water Management Agency

Cc: Robert Fenton, Regional Administrator, FEMA Region 9
Masoud Kermani, Kermani Consulting Group (KCG)



July 3, 2026

Robert J. Fenton, Jr.
Senior Official Performing the Duties of FEMA Administrator
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street, SW
Washington, D.C. 20472

Via: Tammy Littrell, Deputy Regional Administrator
Federal Emergency Management Agency, Region IX
U.S. Department of Homeland Security
1111 Broadway, Suite 1200
Oakland, California 94607-4052

Subject: Request for Immediate Obligation of Pending California Disaster
Recovery Funding

Dear Senior Official Performing the Duties of FEMA Administrator Robert J. Fenton, Jr.:

The California Governor's Office of Emergency Services (Cal OES) writes to express serious concern regarding continued delays affecting FEMA disaster assistance obligations for California and the absence of California projects from the Federal Emergency Management Agency's (FEMA) July 2, 2026, announcement regarding more than \$1.4 billion in Public Assistance (PA), Hazard Mitigation Grant Program (HMGP), and Individual Assistance (IA) funding approvals nationwide.

While FEMA announced significant recovery and mitigation investments supporting communities across the country, California, despite facing some of the nation's most catastrophic and costly disasters, received no HMGP, PA or IA project obligations in the announcement. The omission of California from this announcement directly impacts Americans who are residents and survivors that



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Robert J. Fenton, Jr.
July 3, 2026
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continue working to recover from catastrophic disasters and prepare for future emergencies.

Federal disaster funding is vital for states and local communities to strengthen preparedness, support long-term recovery, and reduce future disaster risk. Hazard mitigation funding remains essential to helping communities complete wildfire mitigation, infrastructure hardening, and resilience projects before the next disaster occurs.

California has not received any new FEMA HMGP obligations since July 2025. Additionally, approximately \$2.01 billion in HMGP funding remains pending federal review across 301 subapplications and projects. In the six Calendar Years (CY) from 2019 through 2024, FEMA approved an average of 111 Hazard Mitigation Projects per year. In CY 2025, FEMA approved only 33 projects, and four of these were Legislative Pre-Disaster Mitigation (LPDM, aka, Congressionally Directed Spending) projects. Aside from the LPDM projects, FEMA has not awarded a project with federal cost share over \$1 million since July 10, 2025. Until outstanding funds are obligated, critical mitigation projects cannot move forward, delaying both recovery and long-term resilience efforts.

The consequences of these delays are already being felt. In the City of Rancho Palos Verdes, four HMGP subapplications totaling approximately \$121 million remain pending despite urgent public safety needs. These projects include landslide stabilization measures and home acquisitions in areas experiencing significant ground movement. Following a shift from prolonged drought conditions to severe rainfall, landslide activity accelerated dramatically, worsening an already hazardous situation. Timely FEMA funding is critical to allow the City to complete infrastructure stabilization efforts and begin property acquisitions needed to protect residents and reduce future disaster costs.

Under the 2025 Los Angeles wildfire HMGP allocation alone, 51 subapplications totaling approximately \$87 million remain at FEMA Headquarters pending final obligation review, despite having cleared programmatic review and being ready for award. These projects provide critical capacity for permitting, inspections, code enforcement, and resilient rebuilding in wildfire-impacted American communities. Until funding is released, local governments cannot fully scale recovery operations, thousands of homeowners face longer timelines to rebuild and return home, and communities remain more vulnerable to future disasters. Pending obligations include Los Angeles County Public Health (\$23.8 million), Public Works (\$19.8 million), the Fire Department (\$17.8 million), the City

Robert J. Fenton, Jr.
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of Malibu (\$14.7 million), the City of Los Angeles (\$9.1 million), and the County Department of Economic Opportunity (\$1.8 million).

The scale of pending Home Hardening funding in California's wildfire-exposed jurisdictions warrant immediate FEMA action. More than \$661.4 million is pending in Los Angeles County across 63 projects, alongside approximately \$187.4 million in San Bernardino County, \$91.5 million in Kern County, \$43.4 million in Shasta County, \$41.6 million in Placer County, \$35.1 million in Siskiyou County, and \$23.5 million in El Dorado County—all strong, mostly rural American communities. Additional investments remain stalled in Calaveras County, Plumas County, Tulare County, Tuolumne County, and Modoc County, where even smaller awards can have outsized impacts in these American rural, high-fire-severity communities. In Plumas County, a wildfire mitigation project designed to harden 64 homes and create defensible space for approximately 150 seniors and disabled residents relied on both FEMA and Housing and Urban Development (HUD) funding. Although the project was ready for implementation, delays in the FEMA award process prevented the County from accessing \$550,000 in matching HUD funds. As a result, the County is now evaluating withdrawal of the project due to the loss of critical implementation funding.

Similarly, a shovel-ready seismic retrofit project at Kern Valley Hospital, in Kern County, valued at approximately \$32 million, including \$23 million in federal funding, remains awaiting obligation. The project would strengthen the only acute care and emergency medical facility serving more than 25,000 residents in this remote region of Kern County and help ensure the hospital remains operational following a major earthquake. Unlike many hazards, earthquakes occur without warning, leaving little or no time for communities to prepare once an event begins. Delayed funding prolongs the community's exposure to seismic risk, threatens continuity of emergency and acute medical care, and postpones investments specifically designed to protect lives and maintain critical services when they are needed most.

Additionally, approximately \$3 billion in FEMA PA funding across 18 disasters is still pending DHS Headquarters and Congressional review despite receiving regional approval. Despite repeated requests for prioritization of Los Angeles wildfire recovery projects, one of the State's most recent disasters, Cal OES has received no clear timeline regarding release of these funds.

FEMA funding delays are slowing the recovery of houses of worship and faith-based institutions that serve as the social and spiritual backbone of wildfire-impacted communities. Dozens of churches, synagogues, religious schools, and

Robert J. Fenton, Jr.
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daycare facilities were damaged or destroyed in the wildfires of Los Angeles. Many of these institutions support congregations that also lost homes, businesses, and livelihoods, making them vital centers of stability and recovery. Months after the disaster, some congregations remain displaced and continue to operate from temporary locations while awaiting funding needed to rebuild. The impact is evident across some of the hardest communities hit by the fires. In the Palisades Fire footprint, critical assistance remains delayed for impacted Jewish and Christian institutions, including the Pacific Palisades Presbyterian Church. Concurrently, across the Eaton Fire zone in Altadena and Pasadena, recovery momentum has stalled for vital community anchors such as the Pasadena Jewish Temple & Center, Altadena Baptist Church, St. Mark's Episcopal Church, and Lifeline Fellowship Christian Center in West Altadena—a historic cornerstone of the local African American community led by Bishop Charles Dorsey—remains completely displaced after its sanctuary was entirely leveled. The Pasadena Jewish Temple and Center lost its campus and anticipates years of recovery before it can return to a permanent home. Similarly, St. Mark's Episcopal Church and School campus, which has served its community for more than a century, sustained extensive damage across its worship, educational, and community facilities. Delayed federal funding prolongs displacement, slows reconstruction, increases the cost of reconstruction and recovery, and delays the restoration of essential spaces that help communities heal and rebuild after disaster, further fracturing the vital interfaith networks that serve as the bedrock of community-wide recovery.

The continued withholding of these federal recovery dollars uniquely harms historically interconnected diaspora populations, most notably the region's extensive Armenian American community. The January 2025 Eaton Fire completely leveled the Sahag-Mesrob Armenian Christian School in Altadena—a vital cultural and educational anchor since 1980—leaving hundreds of students displaced, while simultaneously destroying the homes of more than 100 local Armenian American families. While regional spiritual anchors like St. Sarkis Armenian Apostolic Church and the AGBU Pasadena Center have stretched their own resources to capacity to provide temporary classrooms and humanitarian aid hubs, the lack of dedicated, expedited PA funding severely restricts the community's ability to permanently rebuild. Delaying these funds forces a community carrying deep historical trauma to remain in a prolonged state of displacement, stalling the restoration of essential educational and cultural lifelines.

Beyond community displacement, FEMA funding delays are slowing the recovery of critical water systems damaged in the Los Angeles wildfires. While

Robert J. Fenton, Jr.
July 3, 2026
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communities have completed emergency work and submitted recovery projects, FEMA funding has not reached local water providers. As a result, recovery efforts are delayed, emergency reserves have been depleted, financial pressures on residents and water districts continue to grow, and critical investments needed to restore safe drinking water, strengthen fire protection capabilities, and improve resilience against future disasters are now at risk.

The LA wildfires alone impacted 11 distinct public community water and wastewater networks across Los Angeles County, forcing smaller mutual systems like the Las Flores Water Company to lose up to 75 percent of their revenue due to near-total physical infrastructure loss. In one of the communities hardest hit by the fire, Altadena, more than \$10 million in pending FEMA funding remains unavailable for projects that would rebuild damaged reservoirs, restore pumping and water delivery capacity, repair damaged facilities, and reimburse costs incurred to provide emergency drinking water and maintain essential water services following the fires. Furthermore, emergency repairs to critical storage assets, such as the Los Angeles Department of Water and Power's (LADWP) Santa Ynez Reservoir floating cover and local storage tanks, require long-term capital stabilization. Without the immediate release of approved PA funding, these severely impacted municipal and mutual water districts cannot advance essential water resiliency plans, replace vulnerable pipelines, or build out seismically resilient distribution networks, leaving hundreds of thousands of residents vulnerable to compromised drinking water and diminished fire-flow capacity.

Furthermore, the federal funding backlog directly compromises the stabilization of the LA region's healthcare safety net, which was pushed to the brink of collapse during the January 2025 Fires. While major acute care centers—including Providence St. Joseph's Health Center in Santa Monica and USC Verdugo Hills Hospital in Glendale—narrowly avoided catastrophic evacuations, frontline community medical infrastructure was completely decimated. The Providence St. Joseph's Medical Center in the Palisades Fire footprint and the AltaMed Medical Group facility in Pasadena were entirely leveled, cutting off primary and pediatric care for thousands of residents. Additionally, over 700 vulnerable patients required emergency ambulance evacuations from regional skilled nursing facilities, and key public health centers were forced onto generator power or shut down entirely. Stalling PA funding prevents essential medical providers and community clinics from restoring permanent operations, rebuilding lost clinical space, and securing resilient power systems, leaving the region's healthcare delivery system deeply exposed ahead of the current fire season. These delays, simply put, are actively hurting the medical safety net for

Robert J. Fenton, Jr.
July 3, 2026
Page 6

Americans through impacts to *both* major regional hospital foundations and historically underserved, low-income American community clinics.

California is also continuing to experience delays in IA-related recovery funding. As reflected in prior Cal OES correspondence to FEMA regarding Disaster Case Management Program funding for DR-4856, California submitted timely requests and all required documentation for reimbursement installments associated with services directly assisting Los Angeles wildfire survivors to navigate their recoveries, yet multiple installments remain unreleased without explanation. This delay in funding has resulted in the unnecessary use of state general funds to fund this federal program. The prolonged delay has required the California Department of Social Services (CDSS) to temporarily borrow funding from other sources to sustain critical disaster case management operations, reducing the availability of resources for other state programs and creating unnecessary fiscal and operational challenges while recovery efforts remain ongoing.

In addition, California's request for long-term disaster recovery supplemental funding has not yet advanced to Congress. Programs such as Community Development Block Grant Disaster Recovery funding remain essential to supporting housing recovery, infrastructure restoration, and long-term community rebuilding following the January 2025 wildfires.

In addition to southern regional crises, the federal obligation backlog severely undermines critical northern California utility infrastructure, specifically threatening the operational stability of the Livermore-Amador Valley Water Management Agency (LAVWMA), which services Alameda and Contra Costa Counties and Americans that live there. Serving as a vital wastewater export corridor for the tri-valley area, LAVWMA's critical pipeline network, pump stations, and essential sub-surface infrastructure sustained significant collateral degradation and high-velocity runoff damage during the 2023 Winter Storms. Delaying the obligation of approved PA funding directly stalls urgent structural repairs, asset stabilization, and essential wet-weather flow management upgrades. Forcing LAVWMA to carry these heavy capital liabilities limits the agency's ability to fortify its export capacity against future severe weather events, creating an acute public health and environmental risk for the thousands of residential and commercial ratepayers relying on this regional pipeline network.

Infrastructure projects across PA Categories C (Roads and Bridges), D (Water Control Facilities), E (Buildings and Equipment), and F (Utilities) face rigid, unforgiving seasonal construction windows. Delays in funding push critical

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engineering, heavy civil work, and utility restoration out of optimal summer and dry-season months and into late-fall and winter weather hazards. Missing these environmental windows forces projects to stand down, leading to mid-construction site degradation, contract demobilization and remobilization penalties, and extended contractor overhead—cumulatively driving up project costs and delaying vital community restoration. We request FEMA prioritize LA wildfire projects as well as other PA Categories C-F projects and release funds now to avoid these incurred additional costs, making these projects more expensive, ultimately to the American taxpayers.

Cal OES has demonstrated strong stewardship of federal funds, disbursing more than \$7.1 billion, including approximately \$5.6 billion in DR-4482 COVID-related funding since January 2025, to communities in need, coordinating closely with Region IX as necessary to prioritize liquidation. During this timeframe, California has also driven to meet its federal cost share partnership responsibilities by providing more than \$525 million in state funding to support its community recovery.

Since January 2025, Cal OES has partnered closely with FEMA to support the Administration's priority of moving grants forward, validating eligible costs, and accelerating disaster closeout. Through streamlined processes, dedicated resources, and sustained coordination, Cal OES has submitted 4,633 projects totaling approximately \$11.2 billion to FEMA for final grant closeout across wildfire, winter storm, flood, mudslide, and COVID-19 disasters. This represents an average throughput of approximately 59 projects and \$143.6 million submitted to FEMA for closeout per week.

Over the past year, California communities have experienced repeated disruptions resulting from federal shutdowns, partial operational interruptions, and expanded DHS review requirements that have significantly slowed disaster funding obligations. While California continues investing aggressively in preparedness, mitigation, and response capabilities, including sustaining the California Fire and Rescue Mutual Aid System and statewide wildfire readiness efforts, federal partnership remains essential to protecting American lives and property in California.

Accordingly, California respectfully requests FEMA Headquarters prioritize the immediate review and obligation of pending California PA, HMGP, and IA funding. If these funds cannot be released immediately, Cal OES respectfully requests: (a) an explanation of the reasons for the delay; (b) the legal authority

Robert J. Fenton, Jr.
July 3, 2026
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supporting the delayed action; and (c) anticipated timelines for obligation and release of the pending funds.

California appreciates FEMA's continued partnership and remains committed to working collaboratively to support disaster survivors and strengthen our American communities' resilience. Should you have any questions, please contact Robyn Fennig, Deputy Director of Recovery, at (916) 799-8660 or Robyn.Fennig@caloes.ca.gov.

Sincerely,



CAROLINE THOMAS JACOBS
Director

LAVWMA Projects FY2025/26

It is acknowledged and as has been the case historically that it may not be possible to complete all capital projects proposed in a given fiscal year, and many capital projects may take more than one fiscal year to complete. Prudent capital project planning, however, requires that LAVWMA includes all projects in its capital projects planning program so that planning, funding, financing, and scheduling can be optimized.

Capital Projects FY 2025/26	
San Leandro Sample Station Design Improvements	\$ 1,275,000.00
Export Pumps - New Pumps and Rebuild motors	\$ 190,000.00
Resealing 3 Storage Basins at the Pump Station	\$ -
Pump Station Motor Control Center (MCC) and Soft Starter Upgrades	\$ -
Road Drainage Improvements at the LAVWMA Pump Station	\$
Cathodic Protection Projects	\$ 320,000.00
Export Pipeline Inspection	\$ 600,000.00
PLC / SCADA Upgrade at the Pump Station	\$ 725,000.00
LAVWMA Flow Meter Replacement	\$ -
Smart Detectors on High Maintenance Air/Vac and Air Release Valves	\$ -
Livermore Pipeline Replacement	\$ 75,000.00
Air/Vac Valve Assessment and Resolution at EBDA line	\$ 151,500.00
Replace 17 valve actuators at the pump station	\$ 85,000.00
LAVWMA Asset Management Program	\$ 150,000.00
Pump Station Main Line Cross Over Valve Evaluation	\$ 50,000.00
Ava Bright Choice Program and Solar System	\$ 210,000.00
East Lewelling Blvd Utility Improvements	\$ 150,000.00
NPDES Permit Renewal	\$ 75,000.00
On Call Engineering Support	\$ 220,000.00
Back Up Power Improvements at the Pump Station	\$ -
Other Misc. LAVWMA Renewal/Replacements	\$ 50,000.00
Other Misc. EBDA Renewal/Replacements	\$ 50,000.00
CIP Planning/Management Contingency	\$ 50,000.00
Total Expenditures	\$ 4,426,500.00

Project Status Report

(Bold indicates activity since the November 2025 Board Meeting)

Capital Project Program Capital Program Total - \$4,426,500.00	Lead Agency	Target Completion Date
San Leandro Sample Station Design Improvements • Project Design and Construction Management Contract awarded August 2021. • Project contractor hired August of August 2023. • FY2024/25 Project Management changed from DSRSD to LAVWMA. • Improve infrastructure used for wet weather discharge of LAVWMA flows to San Lorenzo Creek in lieu of the EBDA outfall. • Automation and replacement of valves, flow meters, chlorine analyzers, pressure relief valves, and other instrumentation. Programming of logic controllers and computer control systems. • June 10, 2025 – Project update meeting-June 13 letter from CM to Contractor noting project next steps. • June 24, 2025 – City of San Leandro and Heron Bay HOA given updated construction schedule. • July 10, 2025 – 30” valve, 5th delivery delay. Now expected at the end of August 2025* (all equipment will be on hand). • July 23, 2025 – LAVWMA GM and Project Designer met with the Waterboard regarding discharge exemptions for this project. • Scheduling Scada programmer (TESCO) is the last hurdle to start the project. • August 4, 2025 – Contractor mobilized to the project site. • September 3, 2025 – 30” Mainline valve delivery date is now September 17, 2025. LAVWMA GM gave direction to complete work with the existing 30” valve in order to have the facility fully operational by wet weather season. Then plan to install the new 30” valve in the dry season of 2026. • September 8, 2025 – LAVWMA GM met with senior staff of the contractor and project engineer to discuss critical milestones to complete the project. • September 10, 2025 – Project schedule shows physical project work completed by Oct 1, 2025, with administrative close out tasks concluding on Nov 13, 2025. • September 10, 2025 – Hydrosience (Project Engineer and Construction Manager) has billed \$363,733 of the \$370,560 budget. The consultant is spending more labor on field inspections and oversight of the contractor work than was anticipated. The General Manager recommends the approval of a budget adjustment in the amount of \$149 197. • September 12, 2025 – LAVWMA GM sent email to project designer and construction manager to direct the contractor to focus efforts on getting the station ready for wet weather operation and plan to complete the project during the dry season of 2026. September 15, 2025 – LAVWMA GM, Hydrosience and DSRSD Project had meeting to achieve this goal. • September 17, 2025 – 30” EBDA valve still delayed. System Integrator lacking resources to complete work by October 1, 2025. LAVWMA GM instructed the project team to delay the installation of the 30” EBDA valve until the dry season of 2026. And develop tasks list designed to make the facility operational by wet weather season (November 1).	LAVWMA	30-Jun-26

• September 22, 2025 – Interim Operational items that need completion for SLSS wet season operations: ○ Contractor complete Installation ○ DSRSD Operational staff set up equipment. ○ Pressure Relief valve installed with factory setting certification. ○ 16” Motor Operated Valve Installed and with operational check. ○ Bypass Flow Meter Installed with factory calibration certification. ○ Chlorine Analyzer installed and calibrated. ○ DSRSD staff to conduct a wet test of system. • September 26, 2025 – GM met with Waterboard staff to discuss the NPDES permit application and to update the Waterboard on the status of the upgrades to the SLSS. • September 29, 2025 – The 30” EBDA control valve in the contractor’s possession (too late for installation this dry season). • October 1, 2025 – Station setup for Interim Operation. Project Engineer to provide an interim operation test plan and DSRSD needs to test the station according to that plan. • October 15, 2025 – Reviewed interim operating plan with DSRSD staff and project engineer (Hydroscience). • November 4, 2025 – GM was on site with DSRSD, design engineer (Hydroscience), contractor, staff for an operational test of the San Leandro Sample Station. The system was tested to check readiness if station is needed during the wet weather season. • December 9, 2025 – Asked for Board Approval for \$149,197 adjustment to Hydroscience’s Budget for Design, Construction Management and Construction Inspection services. Revised \$30,000 from request made at the November 19, 2025, meeting of the Board of Directors. Board approved a “Not to Exceed” adjustment of \$149,197 bringing Hydroscience’s total project budget to “Not to Exceed” \$519,757.00. • M & H Area Manager (Contractor) acknowledged letter 05 Corrective Action Plan and will respond by 12/15/2025. • December 18, 2025 – Meeting with LAVWMA, HydroScience and DSRSD on M&H’s response to Letter 05. • January 27, 2026 – Formal responses were sent to the contractor: ○ Correction action plan including a request that the contractor replace the superintendent on this project. ○ Notifying the contractor that excusable delays on the project expired on November 5, 2025, and any delays beyond that date are subject to liquidated damages. ○ Response to these actions requested by February 9, 2026. • February 10, 2026 – Project Meeting with LAVWMA, contractor and Construction Management. • February 24, 2026 – At LAVWMA GM request a letter was sent form Construction Manager to the Contractor requesting a written response to the project correction action plan. • February 26, 2026 – Received a letter from project contractor. ○ Contractor “acknowledges the concerns presented regarding overall project coordination flow and management.” ○ States that contractor believes the overall project delay is due to the delay in the arrival of the <i>sole sourced</i> 30” valve. ○ The contractor agreed to and has replaced their project manager on this project.		
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Item No. 14 - Attachment D

• Final Equipment Shutdown for this project scheduled for July 15-17, 2026. • March 17, 2026 – LAVWMA GM, HydroScience Eng. and DSRSD staff met at the SLSS to inspect the installation of the meter vault. • 3/24/2026 – Hydrosience’s structural engineer sent LAVWMA a letter attesting to the structural integrity of the installation meter vault top at the SLSS. • April 28, 2026 – This project has been in LAVWMA’s Capital Program in the design and now construction phase since FY2021/22. The LAVWMA GM believes this project will be completed by the end of August in FY2026/27. • July 15, 2026 – Attempted to install control valve and flow meter but was unsuccessful due to failure of isolation valves. • GM decided to give the LAVWMA Board an update on this project before proceeding. • Budget – \$1,424,197.00		
Cathodic Protection Improvements • Project Creation FY2023/24 • LAVWMA completed a cathodic protection survey in 2023. • Construction specifications needed to complete the repairs and upgrades delayed due to staffing shortage. • LAVWMA executed an agreement with an On-Call Engineering consultant in April 2025. • LAVWMA On-Call Engineering consultants will complete design specifications and LAVWMA will hire a contractor to complete the project. • June 20, 2025 – LAVWMA staff received a proposal from Carollo Engineers and JHD consultants to provide engineering services for this work. A construction contractor will be needed to complete contractor work. Carollo’s proposal in legal review. • October 10, 2025 – Deadline for DSRSD staff to comment on the scope of this project. Staff comments incorporated in project’s scope. • October 15, 2025 – GM met with JDH to discuss scope and approach to bidding this project. • March 12, 2026 – Meeting with LAVWMA On- Call Engineer to review the General Manager’s draft public works bid for this project. • April 28, 2026 – Signed a task order to have Carollo Engineers serve as the project engineer. • July 23, 2026 –Task order 2 signed with Carollo Engineers ○ <i>Engineering Specifications expected August 2026</i> ○ <i>Project will go out to bid in September 2026</i> ○ <i>Anticipated completion February 2027</i> • Budget - \$320,000.00	LAVWMA	30-Jun-26
Export Pipeline Inspection and Mitigation (see attached completion schedule) • Project Creation FY2023/24 • Selected sections of the 15.3 miles of pipeline will be inspected and spot repairs completed based on current and 2021 Inspection report. • Board directed staff to make an agreement with a pipe inspection contractor. The agreement was executed in September of 2024. • Pressure (Dublin) side of the pipeline and the pipeline at the Pump Station were completed in November 2024.	DSRSD	30-Jun-26

- June through November 2025 gravity sections of the pipe will be inspected and spot repairs completed.
- Spot repair needed 415FT from end of force main.
 - Repair must be rated for operating pressure of 190PSI.
 - Three quotes received:
 - \$369,000 Azuria on 03/26/2025
 - \$88,700 Coordinated Systems on 06/05/2025
 - \$78,950 – Underground Solutions On 08/06/2025 (GM Authorized) * - This quote also includes repairs to 4 additional spots (a total of 7 spot repairs) not included in the first two quotes.
 - June 24, 2025 – planning meeting.
 - Tentative start date July 14, 2025
 - NPS recommends Weco Seals at site of spot repair*
 - Cracks are in coating not steel.
 - Weco seals will protect the pipe from corrosion.
 - LAVWMA pipeline already has weco seals in other locations.
- August 6 – 8, 2025 – Complete – Segment J: STA 397+80 – 500+70
 - Dewatering prior to inspection involved 66 loads at 4,900 per truck load estimate gallons 323,400.
 - Total gallons dewatered from pipeline via pumping or truck to facilitate the inspection is estimated at 671,300.
- DSRSD, City of Livermore and LAVWMA coordinating the storage of effluent to facilitate pipeline inspection.
- GM authorized additional weekend and afterhours pumping if necessary to catch up on pumping effluent stored to facilitate pipeline inspection (expect additional electrical costs for July and August).
- August 20, 2025 – Three segments remaining to be inspected.
- Segment A – Wednesday, August 27th to Thursday, August 28th.
- Spot Repairs the week after Labor Day, on Wednesday, September 10th to Friday, September 12th.
- September 17, 2025 – Two remaining location remaining to complete the project.
- September 19, 2025 – YTD budget spent \$480,894.
- September 23, 2025 – LAVWMA GM approved change order for \$6,275 increasing the cost of the 7 spot repair seals from \$78,950 to \$85,225.
- September 23, 2025 – Caltrans requiring nightwork at Grove Way location.
- September 26, 2025 – GM in consultation with DSRSD staff and inspection contractor concluded inspection work. The Grove Way site will be scheduled for inspection in the summer of 2026.
- Current status – 14 of 15 pipeline segments and 37,623 ft of the 38,901 ft of pipe scheduled for inspection has been completed.
- December 18, 2025 – Requested audit from DSRSD on invoice payments for contractor NPS.
- January 08, 2026 – Approved invoices for NPS for (\$137,658.00, \$112,885.79, \$221,754.39, \$37,424.25)
- Project work has been completed for FY 2025/26. Completion of the inspection at the 15th location will be proposed in the FY 2026/27 budget.
- **Weekend of August 6 – 8, 2026 work to complete the 14th of 15 pipe section inspection.**
- Budget - \$600,000.00

LAVWMA NPDES Permit Renewal • Project Creation FY2024/25 • Proposal to execute an agreement with consultant to the Board of Directors May 2025. • NPDES Renewal application to be submitted to the Waterboard by September 2025. • June 11, 2025 – Executed a not to exceed \$64,250.00 agreement with EOA to provide technical assistance in renewal of the NPDES Permit. • July 16, 2025 – Project Kick-off meeting with EOA, DSRSD and LAVWMA. • July 30, 2025 – Compiling data for the application package. • September 2, 2025 – LAVWMA GM reviewed and provided edits and comments to NPDES renewal application package. • September 16, 2025 – GM sent comments and edits to the consultant related to the Report of Waste Discharge Transmittal Letter (ROWD). • September 26, 2025 – GM met with Waterboard staff to discuss the NPDES permit application and to update the Waterboard on the status of the upgrades to the SLSS. • September 30, 2025 – Completed final review of 85-page NPDES application package and gave the consultant (EOA) approval to transmit to the Waterboard. • September 30, 2025 – Received confirmation from the Waterboard that they received the NPDES renewal application packet. • Scheduled Annual Waterboard’s site inspection of LAVWMA facilities (February 23, 2026). • February 05, 2026 – Annual fee of \$20,000.00 paid for the existing NPDES permit. ▪ The Waterboard’s previous inspection of LAVWMA facilities was conducted on September 29, 2023. ▪ February 23, 2026 – Inspection was a success. Ms. Lee expressed that she did not have any concerns regarding how LAVWMA facilities were operated, maintained or managed. (The inspection report is attached). ▪ The inspection report notes that LAVWMA submitted its application for permit renewal by the due date (September 30, 2025). NPDES permits are issued for a 5-year period. The existing NPDES permit is due to expire July 1, 2026. Ms. Lee Indicated that the Waterboard was behind schedule on reissuing NPDES permit renewals. Ms. Lee believes that the LAVWMA permit renewal will be on the Waterboards agenda in August of 2026. • August 12, 2026 – LAVWMA new tentative order on the Water Boards Agenda for review and approval. • Budget - \$75,000.00	LAVWMA	30-Jun-26
Livermore Pipeline Project • Project Creation FY2023/24 • Project substantially completed by DSRSD. • City of Livermore paid LAVWMA \$5.8 million toward the cost of this project in December of 2024. • Zone 7 easement secured	LAVWMA	30-Jun-26

- City of Livermore and LAVWMA are in negotiations on easement lease agreement.
- FEMA reimbursement for initial response work awarded in November of 2024 – amount \$21,618.29. These funds were deposited in “sole use” reserves.
- FEMA reimbursement for major project work in the amount of \$4.07 million is being pursued by LAVWMA by use of a FEMA consultant.
- Easement lease and FEMA Consultant and other administrative activities to close this project will be billed to the City of Livermore
- Submitted documents to keep Old Pipe Removal Project active in FEMA System 06-09-2025.
- June 25, 2025 – FEMA Consultant (KCG Consulting) has exhausted efforts with State FEMA Reps, will reach out to FEMA FEDERAL Directors to inquire on status of Emergency Repair Reimbursement.
- July 17, 2025 – FEMA has advanced \$4.07 million dollar reimbursement project to Final Reviewer – no target date for completion of final review.
- July 24, 2025, LAVWMA and City of Livermore attorneys awaiting meeting with Airport Manager who has not yet reviewed the lease documents.
- August 5, 2025 – FEMA communication - \$4.07 is in final review. Review will take longer due to the volume of projects FEMA is processing. Note: all projects > \$1 Million require congressional approval.
- August 7, 2025 – LAVWMA and Livermore Attorneys met with Livermore Airport Manager on lease agreement. Hoping to finalize in the next few weeks.
- August 27, 2025 – LAVWMA GM filed Zone 7 Easement Deed with the Alameda County Recorder’s Office.
- September 9, 2025 – Email from FEMA – \$4.06 Million Reimbursement for Sewer Pipe Relocation is with CalOES for review and approval.
- September 9, 2025 – FEMA estimates the reimbursement project will in “Obligation” (Payment Approved) in October of 2025.
- September 11, 2025 – FEMA and CalOES communicated that the project Number 734124 has been approved.
- September 12, 2025 – LAVWMA GM approved project in FEMA portal with a reimbursement of:
 - Federal Share – 75% - \$4,057,479.63
 - Non-Federal Share – 25% - \$1,352,463.21
- September 12, 2025 – CalOES acknowledged LAVWMA GM approval of reimbursement project.
- September 15, 2025 – FEMA acknowledged LAVWMA GM approval of reimbursement project and stated FEMA would let the LAVWMA GM know when the reimbursement is obligated (payment authorized) and set a date for a recovery transition meeting.
- September 23, 2025 – LAVWMA received stamped and recorded Zone 7 easement deeds from the Alameda County recorder’s office.
- October 14, 2025- FEMA informed LAVWMA GM reimbursement obligation is still pending. No further action until resolution of Federal Government shutdown.
- December 2, 2025 – communication from FEMA reimbursement approved but fund allocation still pending. The FEMA continuing resolution for this item does not end until January 31, 2026.
- December 3, 2025 – GM had in pern meeting with FEMA consultant KCG Consulting.

- December 11, 2025 – LAVWMA submitted and CALOES acknowledged receipt P4 (Project Completion and Certification Form) for the small Rip-Rap Project for which LAVWMA received a reimbursement of ~ \$21K. - January 5, 2026 – LAVWMA consultant met with FEMA Management to inquire on when FEMA reimbursement finds would be obligated. - January 7, 2026 – LAVWMA Consultant met with Cal OES to inquire the FEMA reimbursement funds will be obligated. - January 13, 2026 – Sent Staff Time, Contractor payment and Project Close out forms to CalOES and part of CALOES's process to close out the Rip-Rap Project for the Livermore pipeline repair. - February 9, 2026 – Legal counsel continues to work on a lease agreement with the City of Livermore and the Livermore Airport. - FEMA reimbursement update for Livermore Pipeline Projects. - Director Evan Branning forwarded to General Manager Fuller the contact information for Jackson Berg, Community Outreach Manager for Congressman Eric Swalwell. - General Manager Fuller and LAVWMA FEMA Consultant KCG Consulting met with Mr. Jackson Berg of Congressman Swalwell's Office on March 19, 2026, in order to request assistance with FEMA reimbursement for the Livermore Pipeline Project. - March 23, 2026 – General Manager Fuller forwarded to Mr. Jackson Berg 1. Request for support Letter, Privacy release statement, A copy of the FEMA project acceptance form. - April 09, 2026 – LAVWMA received a notice from a Constituent Services Representative of Congressman Swalwell's office that a formal inquiry regarding this reimbursement had been submitted. Legal continues to work with the City of Livermore and the Livermore Airport officials on the easement for LAVWMA. July 13, 2026 CALOES Assistant Director sent letter to the head of FEMA requesting an update on the status of getting FEMA to released the funds associated with LAVWMA's FEMA approved project. - Budget - \$75,000.00		
LAVWMA Asset Maintenance Plan – Phase II - Project Creation FY2025/26 - Develop an Asset Management Policy for LAVWMA - Develop an Asset Management Strategy/Maintenance Approach for large assets over the next 25 years with a budget component for and project prioritization for the next 5 years. - Complete Business Risk Analysis for LAVWMA's Assets - Complete Consequences of Failure analysis for LAVWMA's Assets - Complete Probability of Failure analysis for LAVWMA's Assets - Review Strategic Asset Management Plan for the LAVWMA System and subsystems place findings in a technical memorandum. - June 20,2025 – LAVWMA staff received a proposal from On-Call Engineering Consultant (Carollo Engineers) to complete this project. Proposal in staff review.	LAVWMA	30-Jun-26

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- July 25, 2025 – Carollo sent LAVWMA GM draft Phase one scope of work for this project. The scope is currently being reviewed. - August 18, 2025- GM provided comments on the scope of work for the current fiscal year. - September 10, 2025 – GM and DSRSD staff met with consultant to finalize scope of work for current fiscal year. - October 7, 2025 – Executed a task order with Carollo Engineers to complete condition assessment of the following major assets: - Livermore and Export Pipelines - Export Pump Station (Pumps, Motors, and Switchgear) - SLSS Sample Station - October 7, 2025 – LAVWMA GM and Carollo Engineers signed a task order to begin next phase of Asset Management program. - October 21, 2025 – Project is underway but staffing shortages at DSRSD may delay the completion schedule. - November 18, 2025 – DSRSD staff uploaded 12 set of inspection files to the Carollo Engineering FTP site for records inspection. More will be uploaded as DSRSD has the time to do so. - Meeting on ISO 55000 certification set for March 03, 2026. - February 9, 2026 – planning a 2-day inspection of all LAVWMA facilities in March 2026 timeframe. Presentation to the LAVWMA BOARD on August 19, 2026. Expected draft technical memo By October 2026. - Budget - \$150,000		
Evaluation and Overhaul of Export Pumps - Project Creation FY2025/26 - Overhaul 2 Export Pumps and Motors- Pumps #4 and #7. - June 25, 2025 - Pump #4 is pulled at the factory for overhaul. - Pump #4 Motor scheduled to arrive in December 2025. - Pump #4 Motor Replacement Quotes - During commissioning Pump #7 had vibration issue - Mitigation Step 1 - replace coupler (underway) - Pump #9 will be overhauled after #4 and #7 are operational. - January 29, 2026 – Export pump #4 has been overhauled awaiting reinstallation. Awaiting coupling to complete overhaul of export pump 7. - May 6, 2026 - Pump 4 is working great, no further action. - Pump 7, received the coupling and installed it last week, however the coupling has the wrong thread size, we will work to get the right one installed. - Pump 2 and 9 are the remaining pumps to be overhauled. - Budget for 9 to be done in FY 2026/27 - Pump 2 we can evaluate and schedule for FY 2027/28 August 9, 2026 Staff investing vibration problem with Pump 7 – Out of Service. Staff investing check problem with pump 8 – Out of service, but operational if needed. 8 of 10 pump fully operational - Budget - \$190,000.00	DSRSD	30-Jun-26
Pump Station Cross Over Valve Evaluations - Project Creation FY2025/26 - Assess the material and operational condition on the 24” and 36” crossover valves at the LAVWWMA Pump Station	DSRSD	30-Jun-26

• Staff created a valve exercise program so that the operation of these valves is being inspected (large 20” and 36” valves) more often. • Evaluations underway if any mitigation efforts are needed, they will be in future budgets. Presentation on this topic at the August 19, 2026 BOD Meeting • Budget - \$75,000		
Air Entrapment Mitigation Projects • Project Creation FY2025/26 • May of 2025 the Engineering Consultant completed the study. • FY2024/25 Study Complete Project Budget \$109,000.00, Project final cost \$79,894.00 • The study contains 8 ranked mitigation efforts. EBDA is budgeting to complete two of this recommends related to calibration and additional sensors in the EBDA flow meter which measures flow from all EBDA agencies. • This budget proposes to complete 4 of the 8 tasks which Include: ○ Addition of a vent to western terminus vault (Completed) ○ Replacement and upsize of a western terminus air relief valve. (Completed) ○ EBDA is in the process of getting their insertion meter and magnetic meters calibrated. – Both Flow meters have been inspected and calibrated by factory technicians. A final adjustment that could make the meters less sensitive to entrained air is still pending. ○ EBDA Operations Manager communicated that the meters air entrainment adjustments are scheduled for 09/12/2025. ○ September 15, 2025 – All mitigation efforts scheduled for FY2025 have been completed. Observations of impact will be measured during the upcoming wet weather season. ○ All tasks scheduled for the current fiscal year have been completed. • Budget - \$151,500.00	LAVWMA	30-Jun-26
Ava Bright Choice and Solar Arrays at LAVWMA • Project Creation FY2025/26 • DSRSD enrolled in LAVWMA in Ava Bright Choice Clean Energy Program on March 25, 2025. • Ava Bright Choice comes with a 5% discount over the normal PG&E charges. • DSRSD will issue a Request for Proposal for engineering consultants to study LAVWMA entering into a Power Purchase Agreement which includes the installation of solar panels at the LAVWMA Pump Station • If the PPA evaluation proves viable LAVWMA will complete a California Environmental Quality Act (CEQA) analysis and if positive LAVWMA will pursue the solar PPA project. • June 13, 2025 – GM reviewed and commented on DSRSD draft project RFP. • June 18, 2025 – DSRSD issued an RFP seeking a PPA provider for DSRSD and LAVWMA solar Projects. • October 13, 2025 – LAVWMA GM participated in Interviews to select a PPA provider.	DSRSD	30-Jun-26

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- October 15, 2025 – Arc Alternatives PPA advisory consultant scheduled to attend LAVWMA November 19, 2025, Board Meeting. - October 29, 2025 – LAVWMA and DSRSD staff are working on terms and conditions for a potential power purchase agreement and will present to the LAVWMA Board if acceptable terms are agreed to. December 2, 2025 – Draft LOI provided to Endelos (potential PPA provider) December 18, 2025 – Endelos, LAVWMA and DSRD signed the LOI. February 2026 – Negotiations are underway for a power purchase agreement. On March 18, 2026 – DSRSD decided to allow LOI to expire. The parties could reach an agreement favorable to DSRSD or LAVWMA. The project work for FY2025/26 has been finished. - Budget - \$210,000.00		
SCADA/PLC Upgrades to Pump Station - Project Creation FY2023/24 - Project delayed while DSRSD completed this work on DSRSD facilities. - Project will replace SCADA infrastructure at LAVWMA facilities. - DSRSD will start work on LAVWMA facilities in FY2025/26 and complete this project during the FY2026/27. - Project just started as of July 30, 2025. Project awaiting DSRSD staff availability. - Budget - \$725,000.00	DSRSD	30-Jun-26
East Lewelling Blvd Easement Improvements - Project Creation FY2025/26 - Alameda county is conducting an improvement project along East Lewelling Boulevard which includes street widening and the addition of a bike lane and sidewalk. As a result, LAVWMA will need to relocate 4 cathodic test stations and one blow-off valve box. - June 10, 2025 – LAVWMA GM gave Alameda County Public Works permission to have ACPW contractor proceed with this project and bill LAVWMA. - August 21, 2025 – LAVWMA GM visited work site and the county's contractor had made improvements to 3 of the 4 cathodic test stations. - January 27, 2026 – Notified by PG&E that a meter box for LAVWMA's cathodic protection station needs to be replaced. LAVWMA/DSRSD staff have informed PG&E that we feel it is PG&Es responsibility to replace the meter box because the cause of the damage to the box seems to be related to a PG&E power pole which is leaning and casing conduit strain in the meter box. Awaiting future requests for support from Alameda County. - Budget- \$150,000.00	LAVWMA	30-Jun-26
Replace 17 Valve Actuators at the Pump Station Project Creation FY2023/24	DSRSD	30-Jun-26

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- This project will replace actuators on valves at the pump station. The existing actuators are more than 20 years old. - July 30, 2025-13 of 17 Actuators Replaced – Expect project completion by the end of August 2025. September 24, 2025 – all 17 actuators replaced – Project Complete - Budget - \$85,000.00		
On Call Engineering Program - Project Creation FY2025/26 - DSRSD's engineering staff does not have sufficient staffing resources to support all DSRSD, DERWA and LAVWMA Projects. - April 2025 LAVWMA executed an agreement with an engineering consulting firm to conduct engineering support work on LAVWMA Projects which include an asset management plan, cathodic protection improvements, East Lewelling Boulevard facilities relocation and other unforeseen engineering support work that may come up. August 1, 2026, Carollo Engineers, Inc. working both the Asset Management and Cathodic Protection Projects. - Budget - \$220,000.00	LAVWMA	30-Jun-26
Other Misc, LAVWMA Renewal/Replacement Budget - \$50,000.00	LAVWMA	30-Jun-26
Other Misc, EBDA Renewal/Replacement Budget - \$50,000.00	LAVWMA	30-Jun-26
CIP Planning/Mgmt. Contingency Budget - \$50,000.00	LAVWMA	30-Jun-26
FY2025/26 – Major Administrative Projects		
Digital Records Management Program - June 09-2025 – Digital Records Management RFP posted on LAVWMA Website and sent 5 local vendors proposals due July 18, 2025. - July 01, 2025 – GM Met with Chetu – Potential bidder on this project. - No Bids on the RFP for the project by the deadline of July18, 2025. - Feedback from consultants - Break the project into two projects. - Project A- Software acquisition/setup/training - Project B- Document scanning - Advertising the project on additional government websites - Planning to reissue project RFP(s) in September 2025. - October 15, 2025 – LAVWMA reissued RFP. Proposals are due November 21, 2025. - November 21, 2025 – LAVWMA GM received 5 proposals in response to the RFP. Those proposals are currently being reviewed. - December 18, 2025 – Interviewed top two proposers (ConsultADD and RCS). Selected RCS for this project. - January 27, 2026 – Entered into an agreement with Records Controls Services to advise LAVWMA on this project. Revised Records and Retention Policy (last updated in 2003) to the LAVWMA Board on August 19, 2026. - Project Budget - \$97,500.00	LAVWMA	30-Jun-26
Accounts Receivable and Accounts Payable Vendor (RGS)	LAVWMA	30-Jun-26

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• May 30, 2025 – Signed an amendment to Regional Government Services agreement for accounting services for FY2024/25 and a second amendment for FY2025/26. • Project Budget FY2025/26 – Not to Exceed - \$120,000.00		
Upgrade Website to ADA Complaint • July 17, 2025 – Website vendor (Computer Courage) completed ADA icon to the LAVWMA website. • Need to finalize process to certify ADA compliance. • September 4, 2025 – Received scope of work from three consultants to complete this project. • September 30, 2025 – legal review of least costly consultant proposal. Terms and conditions of vendor's proposal are not acceptable to LAVWMA General Manager. • September 29, 2025 – Language translation icon added to the LAVWMA website. • Request for a quote for the next phase of this project issued on January 23, 2026, quotes are due March 6, 2026. • March 06, 2026 – LAVWMA received 6 proposals and selected the consultant TCrest to help LAVWMA bring its website into full ADA compliance. • March 12, 2026 – Signed an agreement with TCrest for services to insure LAVWMA's website is ADA compliant. • August 9, 2026 – Conducting a comprehensive accessibility audit of the LAVWMA website. (Completed) • Identifying all non-compliant elements and providing a detailed remediation plan. (Completed) • Implementing necessary changes by working with LAVWMA's staff. (In Progress) • LAVWMA website currently contains 121 Documents (6155 pages) ○ All documents have undergone ADA remediation and are loaded in an offline website to check for functionality. • Total project YTD costs – \$1150.00 • Project Budget - \$7,500.00	LAVWMA	30-Jun-26
Critical Operations and Maintenance Projects		
Pump Station Chlorination System • Waterboard notified regarding system installation. • July 30, 2025 – System installed and ready for operation. • System start-up will occur after completion of pipeline inspection. • October 15, 2025 – Facility operated well during the summer dry season when it is most needed. • YTD Cost – \$18,417.22 • Project Complete • Project Budget – \$35,000	DSRSD	15-Aug-25

LAVWMA GENERAL MANAGERS GOALS FY2025-26

(The General Manager respectfully requests Board feedback on these proposed goals)

Environmental Compliance. Continue efficient operations of facilities to prevent wastewater overflows. Meet all CEQA mitigation requirements for new construction. Exceed requirements pertaining to community impacts.

- Operate LAVWMA facilities without any violation of LAVWMA's NPDES Permit.
- Achieve a renewal of LAVWMA's NPDES permit by July 1, 2026.
- Assist Member Agencies and keep the LAVWMA Board informed regarding regulatory compliance issues such as Nutrients to the Bay.
- If a solar project at the LAVWMA Pump Station proves viable complete the CEQA process.

Cost Effectiveness. Continue to perform routine maintenance on existing facilities in a manner that promotes cost savings over the projected life of the facilities.

- Manage LAVWMA facilities and LAVWMA Capital Program within budget.
- Work with DSRSD staff to issue an RFP to evaluate a solar project at the LAVWMA Pump Station
- Complete a successful annual audit of LAVWMA's financials.
- Install and obtain proficiency with the use of Blackbaud Financial Software.
- Manage LAVWMA's Financial accounts, being mindful to maximize interest income within the accounts designated by LAVWMA's investment policy.
- Review LAVWMA's Purchasing Policy and Procedures and update, as necessary.

Technical Soundness. Provide technically sound solutions that use the newest available technology without incurring excessive risk.

- Complete all LAVWMA capital and administrative projects on time and within budget.
- Complete the installation of a chlorination system at the LAVWMA Pump Station
- Develop an Asset Maintenance Policy (January 2026) and complete Phase II of an Asset Management and maintenance Plan for LAVWMA Infrastructure (Target completion date will depend on the size of the necessary scope of work -Tentative completion date of June 30, 2026).
 - Develop Asset Management and Maintenance Policy
 - Implement a formal asset management program for LAVWMA in alignment with ISO 55000 guidelines.
 - Develop a 25-Year Asset Management and Maintenance Plan for all assets.
 - Develop a 5-year Asset Management and Maintenance budget plan based on a prioritization analysis for mission critical assets.
 - Complete consequences of failure analysis for all LAVWMA Assets

- Complete a probability of failure analysis for all LAVWMA Assets
- Audit the Computerized Maintenance Management system and input assets missing in the system.

Customer Service. Continue to comply with the 1997 Joint Exercise of Powers Agreement (JPA) and the October 2011 Sewer Service Contract with the LAVWMA member agencies.

- Set up a cloud-based document storage system and copy all LAVWMA paper documents into the cloud-based system. Review and update records retention policy and implement this policy into the operation of the document storage system. With a target completion date of June 30, 2026
- Complete an audit of key organizational policies and procedures for LAVWMA and update where necessary. Target completion of policy audit by June 30, 2026.
- Review and update as necessary the LAVWMA Board of Directors' new Board onboarding procedures.
- Update the LAVWMA website:
 - Convert the LAVWMA Website from .com to ca.gov.
 - Make the Website ADA compliant to improve mobile functionality.
 - Target the completion of the project June 30, 2026.
- Conversion of LAVWMA email accounts from .com to ca.gov, target completion date June 30, 2026.
- Maintain quarterly LAVWMA Senior Advisory Committee Meetings.
- Maintain Monthly Operations and Maintenance Meetings with DSRSD as LAVWMA's Contract Operator.
- Attend EBDA Manager's Meeting and disseminate meeting notes to key staff of LAVWMA Member Agencies.
- Develop a Succession Plan list of LAVWMA tasks that can guide and provide direction of ongoing LAVWMA General Manager and Treasurer Activities.

LAVWMA GENERAL MANAGERS GOALS FY2025-26 - STATUS

Environmental Compliance. Continue efficient operations of facilities to prevent wastewater overflows. Meet all CEQA mitigation requirements for new construction. Exceed requirements pertaining to community impacts.

- Operate LAVWMA facilities without any violation of LAVWMA's NPDES Permit.
 - From April 1, 2025, to March 31, 2026, LAVWMA conveyed XXXX MG of fully treated effluent to East Bay Discharge Authority. There were no violations of LAVWMA's NPDES permit.
 - No Violation of LAVWMA's NPDES permit will operating the San Leandro Sample station as part of the San Leandro Sample station upgrade project.

- On January 28, 2025, there was a 514 gallons release of effluent from an air relief valve on Lewelling Boulevard and March 23, 2026, there was a release of 15-20 gallons from an air relief valve on East Castro Valley Boulevard. Neither of these releases resulted in effluent reaching the waters of the State. Nor did either of these releases have a negative impact on people, property, or the environment. While the goal is to have no releases of effluent the LAVWMA 16-mile pipeline contains eighty-one air relief valves and while they are well maintained a few leaks are expected each year.
- On February 23, 2026, LAVWMA had a successful inspection of LAVWMA's facilities, operations, laboratory procedures, and administration by the California Regional Water Quality Board.
- On June 16, 2026, LAVWMA had a successful inspection of its San Leandro Sample Station completed by the California Regional Water Quality Control Board.
- Achieve a renewal of LAVWMAs NPDES permit by July 1, 2026.
 - September 30, 2025 – Completed final review of 85-page NPDES application package and submitted the application package to the Waterboard. September 30, 2025 – Received confirmation from the Waterboard that they received the NPDES renewal application packet and that it was submitted by the required due date.
 - On February 23, 2026, waterboard staff indicated they had no concerns about the operation and maintenance of LAVWMA facilities. Waterboard staff informed the General Manager that the Waterboard was behind schedule on reissuing NPDES permit renewals. Waterboard staff believe that the LAVWMA permit renewal will be on the Waterboard's agenda in August of 2026.
 - August 12, 2026 the California Regional Water Quality Control Board revised and issued LAVWMA a 5 year NPDES Permit (CA0038679) for period of October 1, 2026 through September 30, 2031.
- Assist Member Agencies and keep the LAVWMA Board informed regarding regulatory compliance issues such as Nutrients to the Bay.
 - General Manager has kept the Board updated on regulatory issues.
- If a solar project at the LAVWMA Pump Station proves viable complete the CEQA process.
 - LAVWMA and DSRSD collaborated on a request for proposal with the goal of entering into a power purchase agreement with a solar prover. After extensive negotiations LAVWMA and DSRSD staff decided to end the pursuit of this project, at this time, to the inability to reach terms and conditions that would have been favorable for LAVWMA and DSRSD.

Cost Effectiveness. Continue to perform routine maintenance on existing facilities in a manner that promotes cost savings over the projected life of the facilities.

- Manage LAVWMA Facilities and LAVWMA Capital Program within budget.
 - LAVWMA is projected to complete the FY 2025/26 fiscal year under budget
 - 4th Quarter Financial Statement for FY2025/26 Indicate: XXXXXX

- Work with DSRSD staff to issue an RFP to evaluate a solar project at the LAVWMA Pump Station
 - LAVWMA and DSRSD collaborated on a request for proposal with the goal of entering into a power purchase agreement with a solar provider. After extensive negotiations LAVWMA and DSRSD staff decided to end the pursuit of this project, at this time, to the inability to reach terms and conditions that would have been favorable for LAVWMA and DSRSD.
- Complete a successful annual audit of LAVWMA's financials.
 - Maze and Associates completed an audit of LAVWMA's Financial for the fiscal year ending June 30, 2025. The audit concluded "The Agency's net position improved to \$64.7 million, an increase of \$3,330,614 (5.4%). The largest component of net position continues to be invested in capital assets, net of related debt, which increased by \$2.478 million (4.5%). Unrestricted net position also rose by \$822,606 (14.3%), reflecting stronger liquidity and financial flexibility. The audit also states "With respect to this supplemental information, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplemental information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves."
- Install and obtain proficiency with the use of Blackbaud Financial Software.
 - In FY 2025/26 Regional Government Services began to use Blackbaud as LAVWMA's Financial software.
- Manage LAVWMA's Financial accounts, being mindful to maximize interest income within the accounts designated by LAVWMA's investment policy.
 - Completed LAVWMA maintained the lion share of its fund in CAMP the Board authorized investment fund that had the highest interest rate during the fiscal year.
 - On July 23, 2026, \$6,400,000 transferred from CAMP to LAIF - LAIF interest rates are 3.84% and CAMP interest rates are 3.78%
 -
- Review LAVWMA's Purchasing Policy and Procedures and update, as necessary.
 - Completed and no changes necessary at this time.

Technical Soundness. Provide technically sound solutions that use the newest available technology without incurring excessive risk.

- Complete all LAVWMA capital and administrative projects on time and within budget.
 - LAVWMA Capital Program overall is projected to finish the fiscal year under budget. 4th Quarter Report
 - LAVWMA Operating Budget is projected to finish the year under budget.

- Complete the installation of a chlorination system at the LAVWMA Pump Station.
 - Completed
- Develop an Asset Maintenance Policy (January 2026) and complete Phase II of an Asset Management and maintenance Plan for LAVWMA Infrastructure (Target completion date will depend on the size of the necessary scope of work -Tentative completion date of June 30, 2026).
 - Develop Asset Management and Maintenance Policy
 - Implement a formal asset management program for LAVWMA in alignment with ISO 55000 guidelines.
 - Develop a 25-Year Asset Management and Maintenance Plan for all assets.
 - Develop a 5-year Asset Management and Maintenance budget plan based on a prioritization analysis for mission critical assets.
 - Complete consequences of failure analysis for all LAVWMA Assets
 - Complete a probability of failure analysis for all LAVWMA Assets
 - Audit the Computerized Maintenance Management system and input assets missing in the system.
- Overall, this project is progressing slower than the General Manager anticipated. Delays have been due to two factors. First, the time commitment from DSRSD and LAVWMA staff is greater than was anticipated. The availability of DSRSD and LAVWMA staff to work on this project is less than was anticipated due to staffing shortages and the staff time commitment for other projects was greater than was anticipated. The General Manager is budgeting less effort on capital projects in FY2026/27 which will allow more time to focus on asset management. The General Manager now has a better understanding of the level of effort required and a better understanding of the availability of DSRSD staff to support this effort. The General Manager has set a new completion date for this project of November 2027.
- October 1, 2026, Carollo Engineers are expected to complete a Technical Memorandum on the material condition of LAVWMA's major assets. The Technical Memorandum will cover the following:
 - Pump and Pump Motors
 - Pipeline Cathodic Protection System
 - Electrical Switchgear and Motor Control Centers
 - LAVWMA Pump Station Storage Basins
 - San Leandro and Alamo Canal Wet Weather Outfalls

Customer Service. Continue to comply with the 1997 Joint Exercise of Powers Agreement (JPA) and the October 2011 Sewer Service Contract with the LAVWMA member agencies.

- Set up a cloud-based document storage system and copy all LAVWMA paper documents into the cloud-based system. Review and update records retention policy and implement this policy into the operation of the document storage system. With a target completion date of June 30, 2026
 - November 21, 2025 – LAVWMA GM received five proposals in response to the RFP. Those proposals are currently being reviewed.
 - December 18, 2025 – Interviewed top two proposers (ConsultADD and RCS). Selected RCS for this project.
 - January 27, 2026 – Entered into an agreement with Records Controls Services to advise LAVWMA on this project.
 - Work on the project is underway and should be completed in FY2026/27
 - Update to the Records and Retention Policy (Task 1 of the Records Management Program Scope) brought to the LAVWMA Board on August 19, 2026.
- Complete an audit of key organizational policies and procedures for LAVWMA and update where necessary. Target completion of policy audit by June 30, 2026.
 - Work on this project is underway and should be completed by June 30, 2026. This will inform necessary policy updates for FY 2026/27.
- Review and update as necessary the LAVWMA Board of Directors' new Board onboarding procedures.
 - A Task List has been developed - Completed.
- Update the LAVWMA Website:
 - Make the Website ADA compliant to improve mobile functionality.
 - ADA language icon added to the LAVWMA website on September 29, 2025
 - Target the completion of the project June 30, 2026 (revised to October 15, 2026)
 - September 29, 2025 – Language translation icon added to the LAVWMA website.
 - Request for a quote for the next phase of this project issued on January 23, 2026, quotes are due March 6, 2026.
 - March 06, 2026 – LAVWMA received six proposals and selected the consultant TCrest to help LAVWMA bring its website into full ADA compliance.
 - May 12, 2026, agreement signed with TCrest work on this project is underway.

- 1 Initial ADA / WCAG 2.2 AA Accessibility Audit Report - Completed 5/24/2026
- 2 Accessibility Statement Draft Completed - 6/5/2026
- 3 Remediation Plan Remediation Plan & Prioritization Report – Completed 6/20/2026
- 4 Implementation & Testing Remediation (all identified documents) - Completed 7/25/2026

Project Estimated completion date October 15, 2026

- Conversion of LAVWMA email accounts from .com to ca.gov, target completion date June 30, 2026.
 - General Manager has decided to delay work on this project until FY2026/27.
Conversion is not required. The GM may undertake this project in FY 2026/27.
- Maintain quarterly LAVWMA Senior Advisory Committee Meetings.
 - Completed
- Maintain Monthly Operations and Maintenance Meetings with DSRSD as LAVWMA's Contract Operator.
 - Completed
- Attend EBDA Manager's Meeting and disseminate meeting notes to key staff of LAVWMA Member Agencies.
 - Completed
- Develop a Succession Plan list of LAVWMA tasks that can guide and provide direction of ongoing LAVWMA General Manager and Treasurer Activities.
 - This work is 80 percent completed and should be fully completed by January 2027.



July 21, 2026

Levi Fuller
General Manager
Livermore-Amador Valley Water Management Agency
7051 Dublin Boulevard,
Dublin, California 94568-3018

Re: President's Special Acknowledgement Award – Property/Liability Program

Dear Levi,

On behalf of SDRMA Board of Directors and staff, it is my great pleasure to extend our congratulations to you, your governing body at Livermore-Amador Valley Water Management Agency management, and staff on achieving no paid claims for the Property/Liability Program years 2021-2026. A paid claim for the purposes of this recognition represents the first payment on an open claim during the prior program year and excludes property claims.

As a symbol of our appreciation and acknowledgment of your exceptional performance, we are pleased to present Livermore-Amador Valley Water Management Agency with the *President's Special Acknowledgement Award*, representing your outstanding achievement. In addition to this annual recognition, members with no paid claims receive the following, all resulting in a reduction to their annual contribution amount:

- earned one credit incentive point (CIP) for the 2025-26 program year
- for the prior five consecutive program years earned three additional bonus CIPs

This accomplishment is a testament to your agency's commitment to risk management excellence and a culture of safety and proactive governance. By consistently prioritizing risk management and fostering an environment where safety is essential, your agency has set a standard of excellence that is truly commendable.

Your commitment to safety and continuous improvement helps inspire and encourage fellow SDRMA members, and we are proud to partner with Livermore-Amador Valley Water Management Agency as part of our SDRMA community.

Once again, congratulations on this achievement. Please do not hesitate to reach out if there is anything we can do to support your continued success.

Sincerely,

A handwritten signature in blue ink that reads "Robert J. Swan".

Robert J. Swan, President
Board of Directors
Special District Risk Management Authority





President's Special Acknowledgement Award

The President of the Special District Risk Management Authority

Hereby gives special recognition to

Livermore-Amador Valley Water Management Agency

The President's Special Acknowledgement Award is to recognize members with no "paid" claims during the prior five consecutive program years in the Property/Liability Program. A "paid" claim for the purposes of this recognition represents the first payment on an open claim during that same period and excludes property claims. Congratulations on your excellent claims record!

Robert J. Swan, SDRMA Board President

7/14/2026

Date



Livermore-Amador Valley Water Management Agency

July 1, 2026

County Clerk
Alameda County
1106 Madison Street, 1st Floor
Oakland, CA 94597

Re: Registry of Public Agencies Filing for LAVWMA

Enclosed is the updated Registry of Public Agencies Filing for the Livermore-Amador Valley Water Management Agency effective July 1, 2026.

Please return a copy with the endorsed file stamped to my attention.
Should you require additional information, please contact me at (925) 875-2283.

Sincerely,

A handwritten signature in blue ink that reads "Sheree Davis".

Sheree Davis
Administrative Assistant

Enclosures



California Secretary of State
Registry of Public Agencies
 (Government Code section 53051)

SF-405

Important – [Read Instructions](#) before completing this form.

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Copy Fees – First page \$1.00; each attachment page \$0.50;
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This Space For Office Use Only

1. Type of Filing (Check one.)

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Registry of Public Agencies (First Registry of Public Agencies filing for an agency)

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Livermore-Amador Valley Water Management Agency

b. Nature of Update (Complete if Amendment to Registry of Public Agencies.)

Change in member status

c. Public Agency's County or Counties where an office is maintained

Alameda & Contra Costa

d. Official Mailing Address of Public Agency

7051 Dublin Boulevard, Dublin, CA 94568

3. Chairperson, President, or Other Presiding Officer

a. Name

Steven Dunbar

b. Title

Chair

c. Business Address

1052 S. Livermore Avenue, Livermore, CA 94550

4. Clerk or Secretary

a. Name

Levi Fuller

b. Title

Board Secretary

c. Business Address

7051 Dublin Boulevard, Dublin CA 94568

5. Other Members of the Governing Board (Enter as many as applicable. Attach additional pages for additional members.)

Name

Richard Halket

Business Address

7051 Dublin Boulevard, Dublin, CA 94568

Name

Evan Branning

Business Address

1052 S. Livermore Avenue, Livermore, CA 94550

6. Signature (Additional members set forth on attached pages, if any, are incorporated herein by reference and made part of this Registry of Public Agencies.)

Date

July 1, 2026

Signature

Sheree Davis

Type or Print Name

Sheree Davis



California Secretary of State
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Jeff Nibert

Business Address

200 Bernal Avenue, Pleasanton, CA 94566

Name

Arun Goel

Business Address

7051 Dublin Boulevard, Dublin, CA 94568

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July 1, 2026
 Date

Sherree Davis
 Signature

Sherree Davis
 Type or Print Name



California Secretary of State
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Julie Testa

Business Address

200 Bernal Avenue, Pleasanton, CA 94566

Name

Matt Gaidos (Alternate)

Business Address

200 Bernal Avenue, Pleasanton, CA 94566

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John Marchand (Alternate)

Business Address

1052 S. Livermore Avenue, Livermore, CA 94550

Name

Edward Duarte (Alternate)

Business Address

7051 Dublin Boulevard, Dublin, CA 94568

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July 1, 2020
 Date

Sheree Davis
 Signature

Sheree Davis
 Type or Print Name



Livermore-Amador Valley Water Management Agency

July 1, 2026

County Clerk - Recorder
Contra Costa County
555 Escobar Street
Martinez, CA 94553

Re: Registry of Public Agencies Filing for LAVWMA

Enclosed is the updated Registry of Public Agencies Filing for the Livermore-Amador Valley Water Management Agency effective July 1, 2026.

Please return a copy with the endorsed file stamped to my attention.
Should you require additional information, please contact me at (925) 875-2283.

Sincerely,

A handwritten signature in blue ink that reads "Sheree Davis". The signature is written in a cursive, flowing style.

Sheree Davis
Administrative Assistant

Enclosures



California Secretary of State
Registry of Public Agencies
 (Government Code section 53051)

SF-405

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Date

July 1, 2026

Signature

Sheree Davis

Type or Print Name

Sheree Davis



California Secretary of State
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Date

SF-405 (REV 1/2026)

Signature

Type or Print Name



California Secretary of State
Registry of Public Agencies
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Sheree Davis
 Type or Print Name



Livermore-Amador Valley Water Management Agency

July 1, 2026

Secretary of State – Special Filings Unit
P.O. Box 942870
Sacramento, CA 94277-2870

Re: Registry of Public Agencies Filing for LAVWMA

Enclosed is the updated Statement of Facts, Roster of Public Agencies Filing form showing the officers of the Livermore-Amador Valley Water Management Agency effective July 1, 2026.

Should you require additional information, please contact me at (925) 875-2283.

Sincerely,

A handwritten signature in blue ink that reads "Sheree Davis".

Sheree Davis
Administrative Assistant

Enclosures



California Secretary of State
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a. Name

Steven Dunbar

b. Title

Chair

c. Business Address

1052 S. Livermore Avenue, CA 94550

4. **Clerk or Secretary**

a. Name

Levi Fuller

b. Title

Board Secretary

c. Business Address

7051 Dublin Boulevard, Dublin, CA 94568

5. **Other Members of the Governing Board** (Enter as many as applicable. Attach additional pages for additional members.)

Name

Jeff Nibert

Business Address

200 Bernal Avenue, Pleasanton, CA 94566

Name

Arun Goel

Business Address

7051 Dublin Boulevard, Dublin, CA 94568

6. **Signature** (Additional members set forth on attached pages, if any, are incorporated herein by reference and made part of this Registry of Public Agencies.)

Date

SF-405 (REV 1/2026)

Signature

Type or Print Name



California Secretary of State
Registry of Public Agencies
 (Government Code section 53051)

SF-405

Important – [Read Instructions](#) before completing this form.

There is no fee for a Registry of Public Agencies filing.

Copy Fees – First page \$1.00; each attachment page \$0.50;
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Registry of Public Agencies (First Registry of Public Agencies filing for an agency)

Amendment to Registry of Public Agencies (Change for an existing Registry of Public Agencies record)

2. Agency Information

a. Full Legal Name of Public Agency

Livermore-Amador Valley Water Management Agency

b. Nature of Update (Complete if Amendment to Registry of Public Agencies.)

Change in member status

c. Public Agency's County or Counties where an office is maintained

Alameda & Contra Costa

d. Official Mailing Address of Public Agency

7051 Dublin Boulevard, Dublin, CA 94568

3. Chairperson, President, or Other Presiding Officer

a. Name

Steven Dunbar

b. Title

Chair

c. Business Address

1052 S. Livermore Avenue, Livermore, CA 94550

4. Clerk or Secretary

a. Name

Levi Fuller

b. Title

Board Secretary

c. Business Address

7051 Dublin Boulevard, Dublin, CA 94568

5. Other Members of the Governing Board (Enter as many as applicable. Attach additional pages for additional members.)

Name

Julie Testa

Business Address

200 Bernal Avenue, Pleasanton, CA 94566

Name

Matt Gaidos (Alternate)

Business Address

200 Bernal Avenue, Pleasanton, CA 94566

6. **Signature** (Additional members set forth on attached pages, if any, are incorporated herein by reference and made part of this Registry of Public Agencies.)

July 1, 2026
 Date

Sheree Davis
 Signature

Sheree Davis
 Type or Print Name



California Secretary of State
Registry of Public Agencies
 (Government Code section 53051)

SF-405

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a. Name

Steven Dunbar

b. Title

Chair

c. Business Address

1052 S. Livermore Avenue, Livermore, CA 94550

4. Clerk or Secretary

a. Name

Levi Fuller

b. Title

Board Secretary

c. Business Address

7051 Dublin Boulevard, Dublin, CA 94568

5. Other Members of the Governing Board (Enter as many as applicable. Attach additional pages for additional members.)

Name

John Marchand (Alternate)

Business Address

1052 S. Livermore Avenue, Livermore, CA 94550

Name

Edward Duarte (Alternate)

Business Address

7051 Dublin Boulevard, Dublin, CA 94568

6. Signature (Additional members set forth on attached pages, if any, are incorporated herein by reference and made part of this Registry of Public Agencies.)

July 1, 2020
 Date

Sheree Davis
 Signature

Sheree Davis
 Type or Print Name