January 7, 2026

Eileen White, Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, 14th Floor
Oakland, CA 94612

VIA EMAIL: Eileen.White@Waterboards.ca.gov

Subject: NPDES Compliance Report for Receiving Water Quality Monitoring, TMDL/SSO Support, Copper Action Plans, Mercury and PCBs Watershed Permit Support, and Nutrients Watershed Permit Support

Dear Eileen White:

I am writing on behalf of the Bay Area Clean Water Agencies (BACWA) and its members that own and operate publicly-owned treatment works (POTWs) and that have National Pollutant Discharge Elimination System (NPDES) permits to discharge to San Francisco Bay Area waters. The NPDES permits issued to these agencies impose some requirements that are most efficiently fulfilled as a group. The purpose of this letter is to report on behalf of BACWA members that those requirements are being met, including permit provisions related to: (A) Receiving Water Quality Monitoring; (B) Support for the RMP for supplemental monitoring of constituents of emerging concern; (C) Mercury and PCBs Watershed Permit Support; (D) Cyanide Action Plan; (E) Copper Action Plan; (F) Nutrients Watershed Permit Support; and (G) Total Maximum Daily Load Support.

A. Receiving Water Quality Monitoring

Various NPDES permits require that the permittees support the Regional Monitoring Program for Water Quality in the San Francisco Estuary (RMP), administered by the San Francisco Estuary Institute (SFEI), and established by San Francisco Bay Regional Water Quality Control Board (Regional Water Board) Resolution 92-043, adopted April 15, 1992. BACWA members have and continue to fulfill this requirement by participating in and providing funding to the RMP. A letter from SFEI, dated January 2, 2026, confirming BACWA member agencies' contributions to the RMP, is attached for reference.

B. Support for Monitoring of Constituents of Emerging Concern

Individual NPDES permits as issued or as amended by Order R2-2021-0028 require POTWs to provide supplemental funding to the RMP to support additional studies for constituents of emerging concern. POTWs that made supplemental contributions to the RMP per this requirement are listed in the attached letter from SFEI dated January 2, 2026.

In addition to the special studies supported by these supplemental funds (listed below), the priorities of the RMP have been migrating away from legacy contaminants in favor of CECs. The RMP will continue to evaluate the status of legacy contaminants in all matrices, and CECs are being added based on the results of an extensive review of the RMP's Status and Trends (S&T) Program. As of 2024, the following CECs have been added to the S&T Program: PFAS (water, sediment, prey fish, sport fish, bird eggs, marine mammals), bisphenols (water, sediment), and organophosphate esters (water).

Supplemental fees fully or partially funded the following projects in 2025 (dollar amounts were budgeted for 2025):

- Stormwater CECs Monitoring and Modeling ($450,000)

Several other RMP studies conducted in 2025 were related to CECs but were not specifically supported by supplemental funding from wastewater agencies. In 2025, external funding provided by USEPA through the "Tracking Bay Health" grant allowed increased investment in RMP studies. Studies funded by all sources included: Microplastics in Stormwater Monitoring Pilot (year 2) ($106.2k), PFAS Add-On to Stormwater Depth Monitoring Pilot ($55k), Nontarget Analysis Add-On to Stormwater Monitoring ($36k), Plastic Additives in Bay Water and Archived Sediment ($250k), Quaternary Ammonia Compounds (QACs) in Bay Water and Stormwater ($200k), Nontarget Analysis of San Francisco Bay Fish ($76k), Tire Rubber Marker Analysis for Tire Wear Particle Quantification ($110k), PFAS NMR Analysis in Wastewater, Stormwater, and Bay Matrices ($400k), and Nontarget and Target Analysis of Fibers and Urban Stormwater ($123.7k). Reports on emerging and legacy contaminants published in 2025 included the following:

- Méndez, M., et al. *Emerging PFAS Trends in Water and Sediment from San Francisco Bay.* SFEI Contribution No. 1245. San Francisco Estuary Institute, Richmond, CA, 2025. https://www.sfei.org/documents/emerging-pfas-trends-water-and-sediment-san-francisco-bay
- Méndez, M., et al. "Spatial Trends and Health Risks of Per- and Polyfluoroalkyl Substances in San Francisco Bay Fish from 2009 to 2019." *ACS ES&T Water*, May 20, 2025. http://www.pubs.acs.org/doi/10.1021/acsestwater.4c00999
- Mahony, A., et al. "Quaternary Ammonium Compounds in Wastewater Influents, Effluents, and Biosolids: Analysis from Twelve Wastewater Treatment Plants from 2020 to 2023. *ACS ES&T,* December 16, 2025. https://doi.org/10.1021/acs.est.5c14775
- San Francisco Estuary Institute (SFEI). *2025 RMP Update*. San Francisco Estuary Institute: Richmond, California, 2025. SFEI Contribution No. 1261. https://www.sfei.org/documents/2025-rmp-update

C. Mercury and PCBs Watershed Permit Support

The Mercury and PCBs Watershed Permit (NPDES Permit CA0038849) was most recently reissued as Order R2-2022-0038 with an effective date of February 1, 2023. The Mercury and PCBs Watershed Permit requires source control and risk reduction activities by permittees.

In 2025, BACWA's Bay Area Pollution Prevention Group (BAPPG) continued to reach out to dental assistant and dental hygienist students to educate them about proper amalgam

management and disposal. This campaign reached approximately 130 students and instructors through in-person visits to the following institutions:

- San José City College (two visits)
- Foothill College, Los Altos
- Santa Rosa Junior College
- College of Marin, Novato

The instructors have come to rely on these annual visits and have incorporated BAPPG's program into their instructional calendar. Further, this is a relevant audience for other messages, such as wipes and pharmaceutical disposal.

The BAPPG-hosted website Baywise.org was updated in 2024 and contains pollution prevention guidance for dental offices at https://baywise.org/business-resources/pollution-prevention-guidance-for-dental-offices.

The Mercury and PCBs Watershed Permit requires that permittees implement or participate in programs to reduce mercury and PCBs-related risks to humans from the consumption of San Francisco Bay and Sacramento-San Joaquin River Delta fish. In spring 2025, BACWA coordinated with the Water Board and SFEI to provide funding for pilot testing of a subsistence fishing questionnaire by the Richmond Shoreline Alliance, a community-based organization. BACWA subsequently authorized a contract with SFEI for pilot implementation of the subsistence fishing consumption survey. Regional Water Board staff from the Planning Division are providing programmatic oversight of the work, while BACWA is providing fiscal oversight of the work. Regional Water Board staff have indicated to BACWA that this work fulfills the Mercury and PCBs Watershed Permit risk reduction requirement because it would support development of water quality objectives to protect subsistence fishing, if deemed necessary.

RMP mercury and PCBs sampling in 2025 included monitoring one storm each in seven watersheds distributed amongst Contra Costa, Alameda, Santa Clara and San Mateo counties. This sampling was piggybacked onto sampling for a large suite of various CECs including a primary focus on PFAS compounds and other compounds related to PFAS. This data will join a much larger long-term dataset to support PCB and mercury modeling calibration for the Regional Watershed Dynamic Model.

Additionally, the RMP funded an intensive PCB sampling project known as the OPTICS+ study focused on San Leandro Bay. PCB concentrations and ancillary parameters were measured at the six major tributaries into the San Leandro Bay as well as a site more centrally located within the subembayment itself. The study will provide empirical data to support development of a recovery trajectory model.

The RMP's Status and Trends Monitoring Program monitors mercury, PCBs, and other contaminants in sport fish on a five-year cycle. Sport fish collection was successfully completed in 2024 and results will be reported in 2026. The 2025 Status and Trends dry season Bay water cruise collected samples for PCBs and mercury at three locations in the Bay as part of the California Toxics Rule (CTR) monitoring that occurs every 10 years. Results from that effort are also expected to be reported in 2026.

The following reports on mercury and PCB work were published in 2025:

- McKee, L.J; Moran, K.; and Davis, J. 2025. *Integrated Watershed Modeling and Monitoring Framework to Support the Regional Monitoring Program*. SFEI Contribution No. 1099. San Francisco Estuary Institute: Richmond, CA. https://www.sfei.org/documents/integrated-watershed-modeling-and-monitoring-framework-support-regional-monitoring
- Scheu, K., et al. *San Francisco Bay Sediment and Contaminant Transport Model, Part 2: San Leandro Bay Modeling and PCB Recovery Estimates.* SFEI Contribution No. 1265. San Francisco Estuary Institute: Richmond, CA. https://www.sfei.org/documents/san-francisco-bay-sediment-and-contaminant-transport-model-part-2-san-leandro-bay

D. Cyanide Action Plan

As part of the site-specific objective (SSO) for cyanide, NPDES dischargers are required to calculate the 3-event rolling average of total cyanide concentrations in each segment of the Bay, based on RMP data. The most recent 3-year rolling average, which reflects sample results from 2023, is available in the report listed below:

- Trinh, M. *2023 Update to Cyanide Rolling Average.* San Francisco Estuary Institute: Richmond, California, 2025. https://www.sfei.org/documents/2023-update-cyanide-rolling-average

The 2023 sample results indicate that ambient cyanide concentrations continue to be below the trigger level of 1.0 µg/L in all five segments of the Bay. In August and September 2025, the RMP completed sampling for cyanide during the 2025 Water Cruise. Sample results will be published in 2026.

E. Copper Action Plan

The copper action plan contained in many Bay Area POTW permits requires permittees to implement a plan to reduce copper discharges, conduct studies to reduce copper pollutant impact uncertainties, and implement additional measures should the three-year rolling mean in various parts of the Bay exceed site-specific concentration triggers. The most recent 3-year rolling average, which reflects sample results from 2023, is available in the report listed below:

- Trinh, M. *2023 Update to Copper Rolling Average.* San Francisco Estuary Institute: Richmond, California, 2025. https://www.sfei.org/documents/2023-update-copper-rolling-average

Results indicate that ambient copper concentrations are below the respective trigger levels for all five segments of the Bay. In August and September 2025, the RMP completed sampling for cyanide during the 2025 Water Cruise. Sample results will be published in 2026.

The BAPPG-hosted website Baywise.org contains resources for plumbers that focus on the key messages pertaining to copper control: use of ASTM B813 flux, and other best management

practices to reduce pipe corrosion. Outreach materials are available at https://baywise.org/business-resources/pollution-prevention-guidance-for-plumbers/

F. Nutrients Watershed Permit Compliance

The Regional Water Board reissued the Nutrients Watershed Permit (NPDES Permit CA0038873, Order R2-2024-0013) in July 2024 with an effective date of October 1, 2024. Through a nutrient surcharge levied on permittees, BACWA is funding compliance with the following provisions of the 2024 Nutrients Watershed Permit on behalf of its members:

- **Group Annual Reporting** – On April 1, 2025, BACWA submitted the 2024 Group Annual Report on behalf of permittees. The 2024 Group Annual Report covered the period October 2023 - September 2024 and is available online at https://bacwa.org/wp-content/uploads/2025/04/2024-BACWA-GAR-Final-2025-04-01-Corrected-2025-07-21.pdf. The next Group Annual Report will be submitted to the Regional Water Board by the due date of April 1, 2026.

- **Monitoring, Modeling, and Subembayment Studies –** In 2025, BACWA continued to provide financial support for monitoring, modeling and subembayment studies conducted per the San Francisco Bay Nutrient Management Strategy, which is managed by SFEI. BACWA is providing a total of $2,200,000 to SFEI in Fiscal Year 2026, as required by the 2024 Nutrients Watershed Permits. In 2025, BACWA worked through the Nutrient Management Steering Committee to update the 5-year Science Plan, which is available at https://www.sfei.org/documents/san-francisco-bay-nutrient-management-strategy-2025-2030-science-plan. BACWA also submits an annual science plan on behalf of dischargers, and the science plan for Fiscal Year 2026 was submitted to the Regional Water Board in advance of the due date of June 1, 2025. The annual program plan is available at https://drive.google.com/file/d/1D-7mZ48VmAattqDAfNoDS0ycbdvemuOf/view. The next update of the science plan will be submitted to the Regional Water Board by the due date of June 1, 2026.

- **Regional Planning to Reduce Total Inorganic Nitrogen Loads –** The Nutrients Watershed Permit requires completion of a report describing regionwide planning efforts to meet the permit's final effluent limitations. BACWA is completing this task on behalf of applicable member agencies (i.e., those listed in Table 4 of R2-2024-0013), with assistance from the consulting firm HDR, Inc. In 2025, BACWA submitted a Scoping Plan to the Regional Water Board in advance of the due date of July 1, 2025. The Scoping Plan is available online at https://bacwa.org/wp-content/uploads/2025/06/BACWA-Scoping-Plan-for-Regional-Planning-Study-2025-06-16.pdf. BACWA will provide the Regional Water Board with a status report on the Regional Planning Study by the due date of July 1, 2026.

G. Total Maximum Daily Load Support

Some POTW permits previously included a requirement that permittees report to the Regional Water Board any actions taken in support of Total Maximum Daily Loads (TMDLs) for 303(d) listed pollutants. Support for these efforts has been provided largely through support of the RMP.

In 2014, the RMP convened a Selenium Strategy Team and developed a Selenium Strategy in the Multi-Year Plan. The multi-year plan involves monitoring for selenium in water, clams, and sturgeon to support the North Bay selenium TMDL. Sampling for selenium was paused in 2024 for a review of the data collected through 2023. In addition, RMP funds were budgeted to find analytical partners able to analyze small tissue sample masses associated with non-lethal sampling techniques used for sampling sturgeon muscle tissue. Sampling will resume in 2026 and clam and sturgeon tissue samples will be analyzed in collaboration with the U.S. Geological Survey, Earth System Processes Division laboratory.

Please contact me if you have any questions about the information contained in this letter.

Respectfully Submitted,

Lorien Fono, Ph.D., P.E.
Executive Director
Bay Area Clean Water Agencies

Encl: SFEI Letter regarding RMP Participation, January 2, 2026

cc: James Parrish, Section Leader, Wastewater Control and Enforcement Division, Regional Water Board
Aidan Cecchetti, Section Leader, Wastewater Control and Enforcement Division, Regional Water Board
Margaret Monahan, Section Leader, Wastewater Control and Enforcement Division, Regional Water Board
Xavier Fernandez, Chief, Planning and TMDL Division, Regional Water Board
BACWA Executive Board
Blake Brown, BACWA Permits Committee Chair

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January 2, 2026

Lorien Fono
Executive Director
Bay Area Clean Water Agencies
PO Box 24055, MS 702
Oakland, CA 94623

Dear Dr. Fono,

The Regional Monitoring Program for Water Quality in San Francisco Bay (RMP) is the only comprehensive environmental monitoring program to measure pollutants and trends in the Bay. The RMP, which began in 1993, is a successful partnership of scientists, government, municipalities, and industry to understand and improve the health of the Bay.

The goal of the RMP is to collect data and communicate information about water quality in the San Francisco Estuary in support of management decisions. The accomplishments of the RMP are summarized in the RMP Update and the Pulse. The 2025 RMP Update was published in October. Current and past Pulses can be downloaded here; RMP Updates can be found here.

In 2025, 35 wastewater treatment facilities collectively contributed the full amount of the core RMP program costs assigned to publicly owned treatment works ($1,960,854; see Table 1 for a complete list of agencies). The process used to determine the core fees for each participant group are outlined in the Program Charter: https://www.sfei.org/documents/charter-regional-monitoring-program-water-quality-san-francisco-bay-0.

In December 2021, the Water Board adopted Order R2-2021-0028, which requires publicly owned treatment works to provide supplemental funding to the RMP to support additional studies for constituents of emerging concern (CECs). In 2025, 35 wastewater treatment facilities made supplemental contributions to the Program under Order R2-2021-0028 and similar requirements found in reissued individual NPDES permits ($350,194 see Table 1).

Your support is essential to the RMP. Through these financial contributions, the RMP is able to conduct regional monitoring to assess the cumulative impact of multiple sources of pollutants to the Bay, including the growing number of emerging contaminants that are a concern. We thank you and your members for the support and look forward to serving you in 2026.

Sincerely,

Amy E Kleckner

Amy Kleckner
RMP Manager

Table 1

Wastewater Treatment Facilities Contributing to the RMP in 2025 in FY25

POTW Dischargers	Core RMP Fees	Supplemental Fees for CECs Studies[(1)]
American Canyon, City of	YES	YES
Benicia, City of	YES	YES
Burlingame, City of	YES	YES
Calistoga, City of	YES	YES
Central Contra Costa Sanitary District	YES	YES
Central Marin Sanitation Agency	YES	YES
Delta Diablo	YES	YES
East Bay Dischargers Authority	YES	YES
East Bay Municipal Utility District	YES	YES
Fairfield-Suisun Sewer District	YES	YES
Las Gallinas Valley Sanitary District	YES	YES
Marin County (Tiburon), Sanitary District No. 5 of	YES	YES
Millbrae, City of	YES	YES
Mt. View Sanitary District	YES	YES
Napa Sanitation District	YES	YES
Novato Sanitary District	YES	YES
Palo Alto, City of	YES	YES
Petaluma, City of	YES	YES
Pinole/Hercules, City of	YES	YES
Rodeo Sanitary District	YES	YES
San Francisco International Airport	YES	YES
San Francisco (Southeast Plant), City and County of	YES	YES
San José-Santa Clara Regional Wastewater Facility	YES	YES
San Mateo, City of	YES	YES
Sausalito - Marin City Sanitary District	YES	YES
Sewerage Agency of Southern Marin	YES	YES
Silicon Valley Clean Water	YES	YES
Sonoma Valley County Sanitary District	YES	YES
South San Francisco and San Bruno, Cities of	YES	YES
St. Helena, City of	YES	YES
Sunnyvale, City of	YES	YES
Treasure Island Development Authority	YES	YES
Vallejo Flood and Wastewater District	YES	YES
West County Wastewater District and City of Richmond (formerly West County Agency)	YES	YES
Yountville, Town of	YES	YES

(1) NPDES Permit CA0037885 (Port Costa Wastewater Treatment Plant) and NPDES CA0037427 (Paradise Cove Treatment Plant) also require supplemental funding of CECs studies, but the requested contribution in 2025 was $0 due to these agencies' small size.