



# BACWA Workshop #2: Nutrient Reduction by Treatment Optimization and Upgrades Update

7 June 2017



**Brown AND Caldwell**



**B A C W A**  
**BAY AREA**  
**CLEAN WATER**  
**AGENCIES**

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# Agenda

1. Background
2. Case Studies
3. Draft Findings of Nutrient Removal Reports
  - a) Optimization
  - b) Sidestream
  - c) Upgrades
  - d) No Net Load Increase
4. Key Variables that Impact Results
5. Regulatory: N versus P
6. Results of Recycled Water/CIP Surveys
7. Sea Level Rise
8. Next Steps





# Project Background

# Watershed Permit



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## San Francisco Bay Regional Water Quality Control Board

ORDER No. R2-2014-0014  
NPDES No. CA0038873

### WASTE DISCHARGE REQUIREMENTS FOR NUTRIENTS FROM MUNICIPAL WASTEWATER DISCHARGES TO SAN FRANCISCO BAY

The following dischargers are subject to waste discharge requirements (WDRs) set forth in this Order, for the purpose of regulating nutrient discharges to San Francisco Bay and its contiguous bay segments:

Table 1. Discharger Information

Discharger	Facility Name	Facility Address	Minor/ Major
		151 Merritt Court	

April 9, 2014

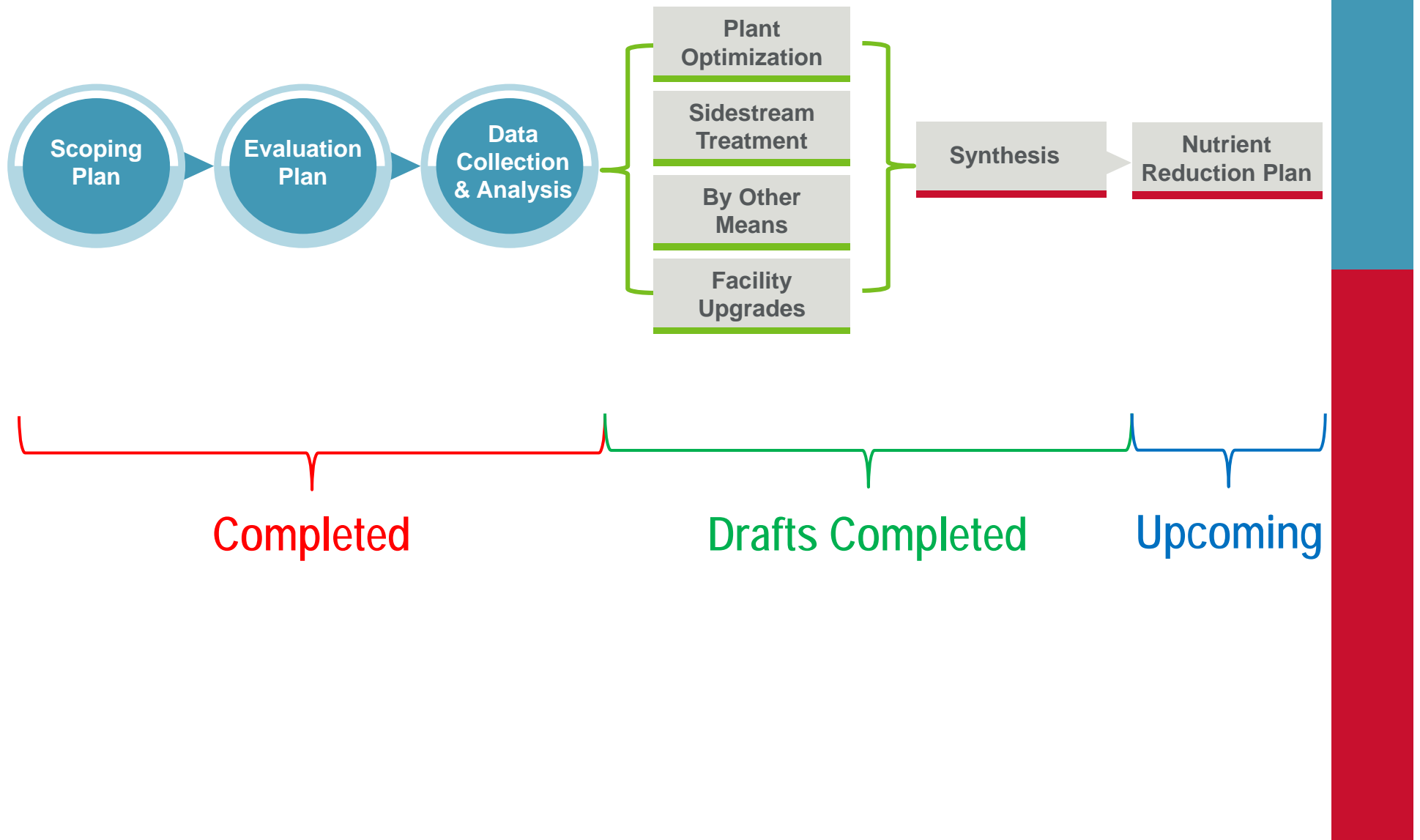
# Watershed Permit Requirements

- Issued April 9, 2014 – Regional Water Board Order No. R2-2014-0014
- Requirements:
  - Scoping and Evaluation Plan (Accepted first quarter of 2015)
  - July 2018: Task 1 - Conduct treatment plant optimization and sidestream treatment evaluation for nutrient load reductions (Submittal deadline is July 2018)
  - July 2018: Task 2 - Conduct treatment plant upgrades and analysis of removal by other means for nutrient load reductions (Submittal deadline is July 2018)
  - Annual Reporting (Annual submittal in October from 2015 through 2018)

## 37 Participating Agencies



# Overview / Status of Study





## Treatment Levels

Level	Study	Ammonia	TN	TP
Level 1 *	Optimization	--	--	--
Level 2 *	Upgrades	2 mg N/L	15 mg N/L	1.0 mg P/L
Level 3 *	Upgrades	2 mg N/L	6 mg N/L	0.3 mg P/L

- \* The seasonal impacts will be considered for all three treatment levels:
- Dry Season = May 1 to September 30
  - Wet Season = October 1 to April 30



# Optimization Approach

- Basis of Evaluation

- Identify no / low cost strategies to reduce effluent nutrients
- Planning Period: 2025 Horizon
- Loading: 0% Increase in Flows and 15% Increase in Loads
- Design Criteria: Aggressive – no permit limits

- Optimization Concepts

- Use offline tankage
- Operate in split treatment mode
- Modify operational mode (e.g., raise SRT)
- Add chemicals
- Process control instrumentation
- Add internal recycle for denitrification



# Upgrades Approach

## ■ Basis of Evaluation

- Identify upgrade strategies to meet effluent targets
- Planning Period: 30 Years
- Loading: Design Capacity
- Design Criteria: Reliability – meet permit limits

## ■ Concepts

- Sidestream Treatment
- Design Facilities for Level 2 that could be further upgraded to meet Level 3 – no stranded assets
- Technology Status: Established Technologies

## Treatment Levels

Level	Ammonia	TN	TP
Level 1	--	Optimization	--
Level 2	2 mg N/L	15 mg N/L	1.0 mg P/L
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# Case Studies





# Pinole

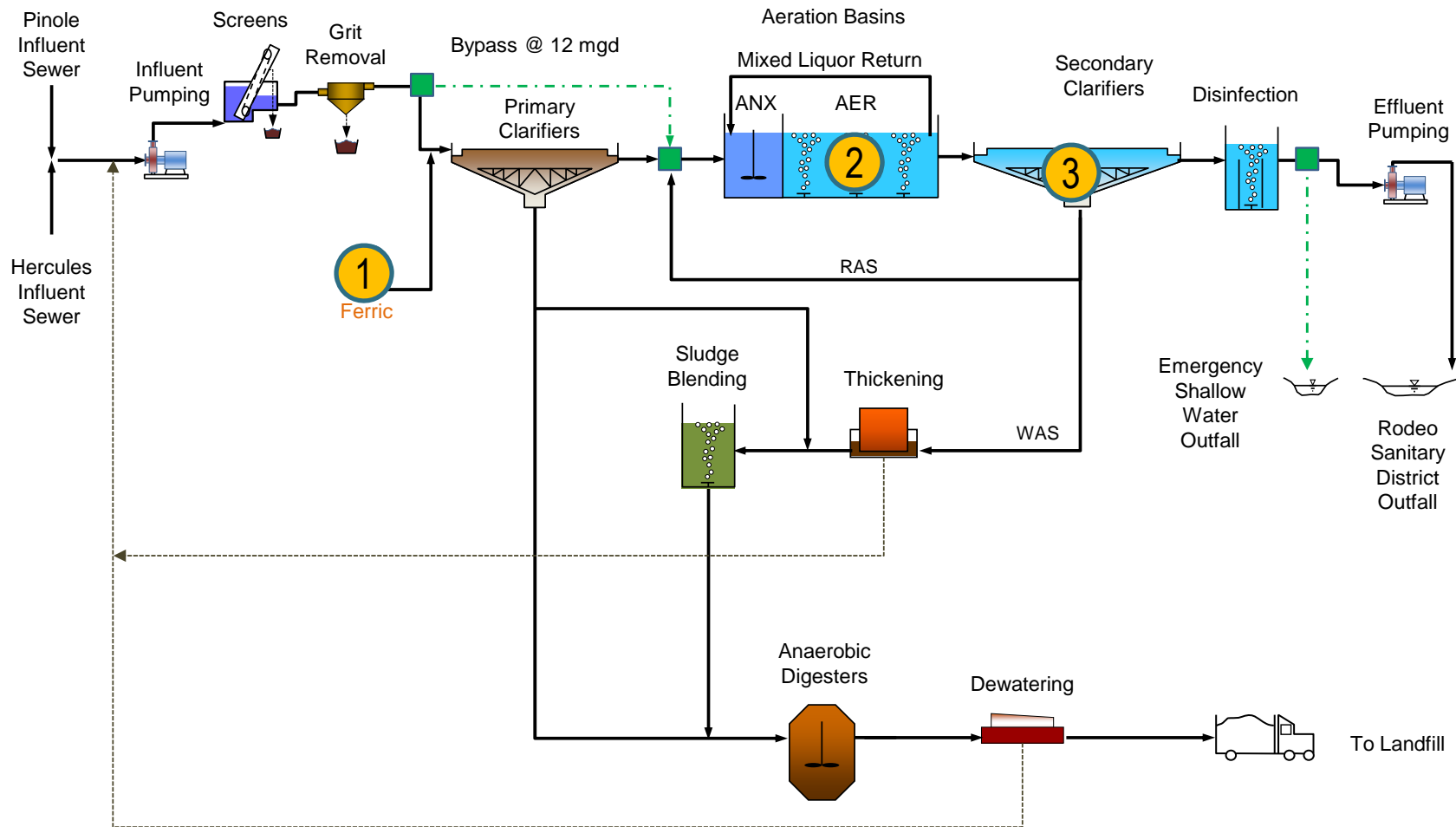
Straight forward, in process of upgrading

# Pinole Optimization and Upgrade Concepts

Process	Current	Optimization *	Sidestream	NNLI	Level 2	Level 3
Primaries	Yes	--	-	Yes	CEPT	CEPT
Act Sludge	BOD	--	-	BNR (MLE)	BNR (MLE)	BNR (4-stage)
Sec Clarifier	Yes	--	-	Replace Existing	Replace Existing	Replace Existing
Peak Flow	-	--	-	Contact Stabilization	Contact Stabilization	Contact Stabilization
Filter	-	--	-	-	-	Denite Filter
Carbon	-	--	-	-	-	Yes
Fe/Al/Poly	-	--	-	-	-	Fe/Pol
Sidestream Treatment	-	--	No for NH4 Yes for TN Yes for TP	-	-	-

\* Plant is under construction for upgrades to meet Level 2

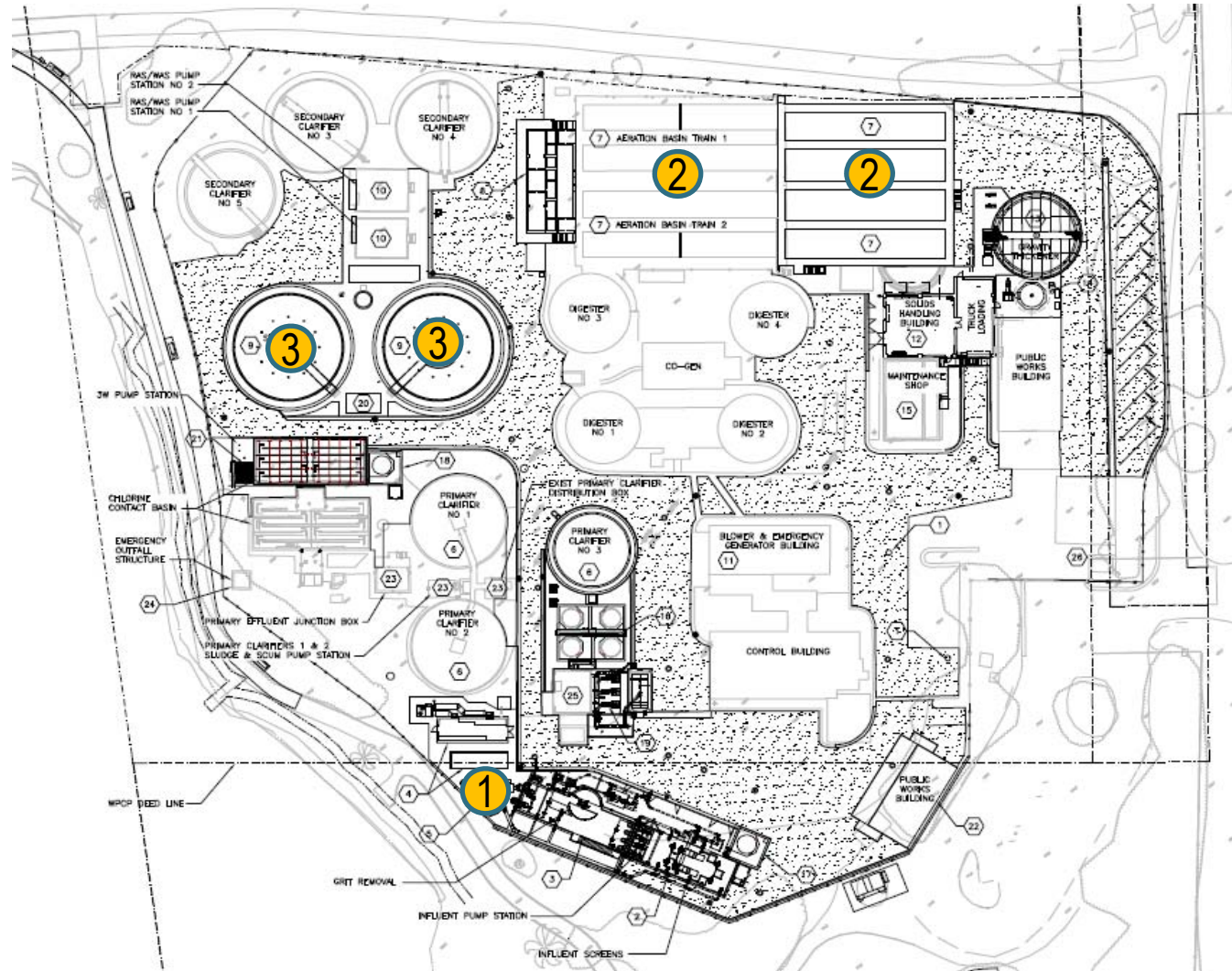
# Pinole Level 2



1. **CEPT:** use the recently implemented chemical feed facilities
2. **Nit/Denite:** expand the aeration basins to operate as nitfrication/denitrification (ability to operate in contact stabilization mode during wet season)
3. **Secondary Clarifiers:** replace with new secondary clarifiers



# Pinole Level 2 Aerial



1. **CEPT:** use the recently implemented chemical feed facilities
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# Level 2 Upgrades



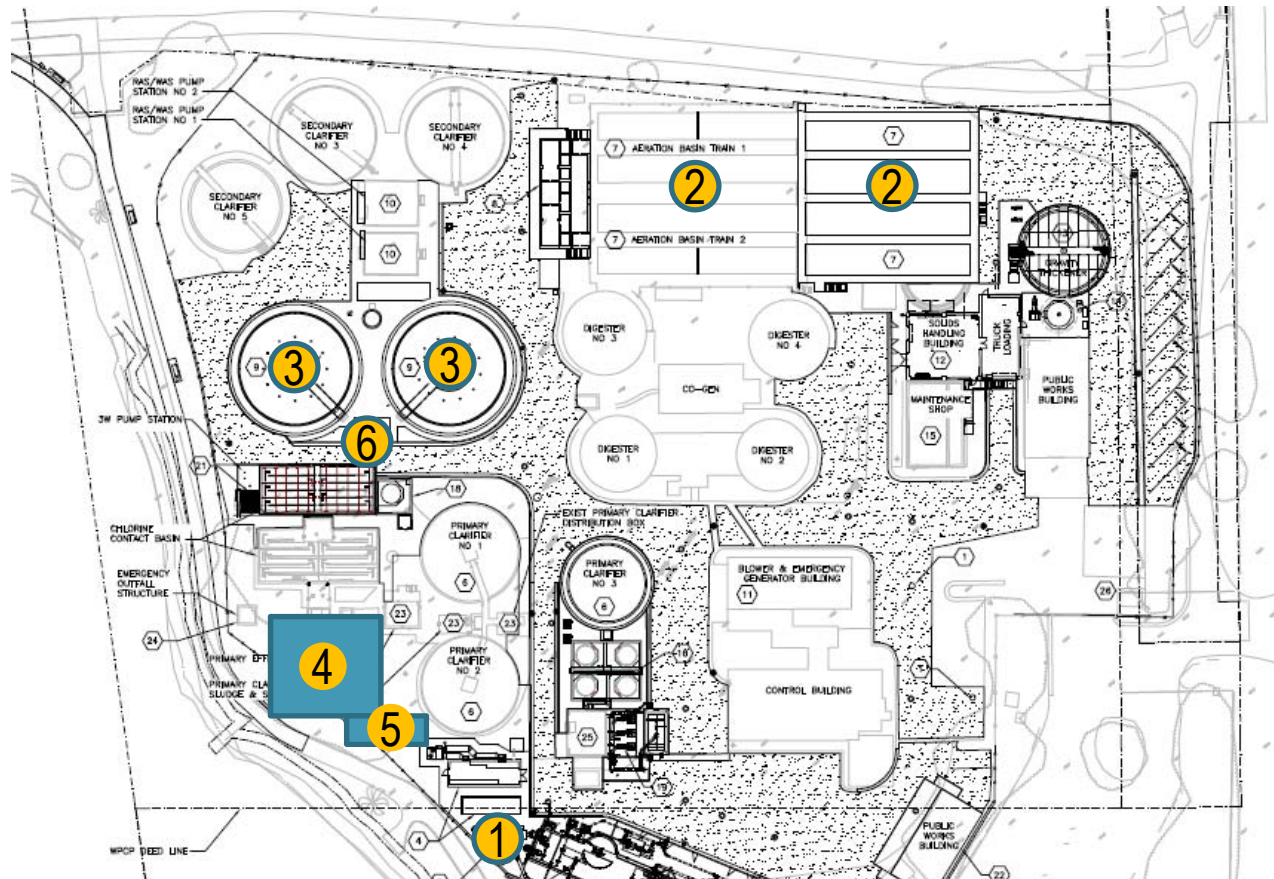


# Pinole Level 3

The diagram illustrates the wastewater treatment process at Pinole Level 3. It begins with influent from the Pinole and Hercules Influent Sewers, which is pumped through screens and grit removal. A ferric chloride addition point (1) is shown. The flow then enters primary clarifiers, with a bypass line (12 mgd) leading to the aeration basins. The aeration basins consist of an ANX tank and an AER tank (2). Mixed liquor return (RAS) is shown from the AER tank back to the primary clarifiers. The effluent from the aeration basins goes to secondary clarifiers (3). Sludge from the secondary clarifiers is sent to a sludge blending tank, then to a thickening tank, and finally to anaerobic digesters. The digesters feed into a dewatering unit, which produces a solid cake for landfill and a liquid stream that is recycled back to the primary clarifiers. The effluent from the secondary clarifiers is disinfected (4, 5, 6) and can be discharged to an emergency shallow water outfall or pumped to the Rodeo Sanitary District Outfall.

1. **CEPT:** use the recently implemented chemical feed facilities
2. **Nit/Denite:** expand the aeration basins to operate as nitrification/denitrification (ability to operate in contact stabilization mode during wet season)
3. **Secondary Clarifiers:** replace with new secondary clarifiers
4. **Denitrifying Filters:** add denitrifying filter complex
5. **Carbon:** add external carbon source
6. **Metal Salt:** add metal salt chemical feed facilities

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2. **Nit/Denite:** expand the aeration basins to operate as nitrification/denitrification (ability to operate in contact stabilization mode during wet season)
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# Level 3 Upgrades





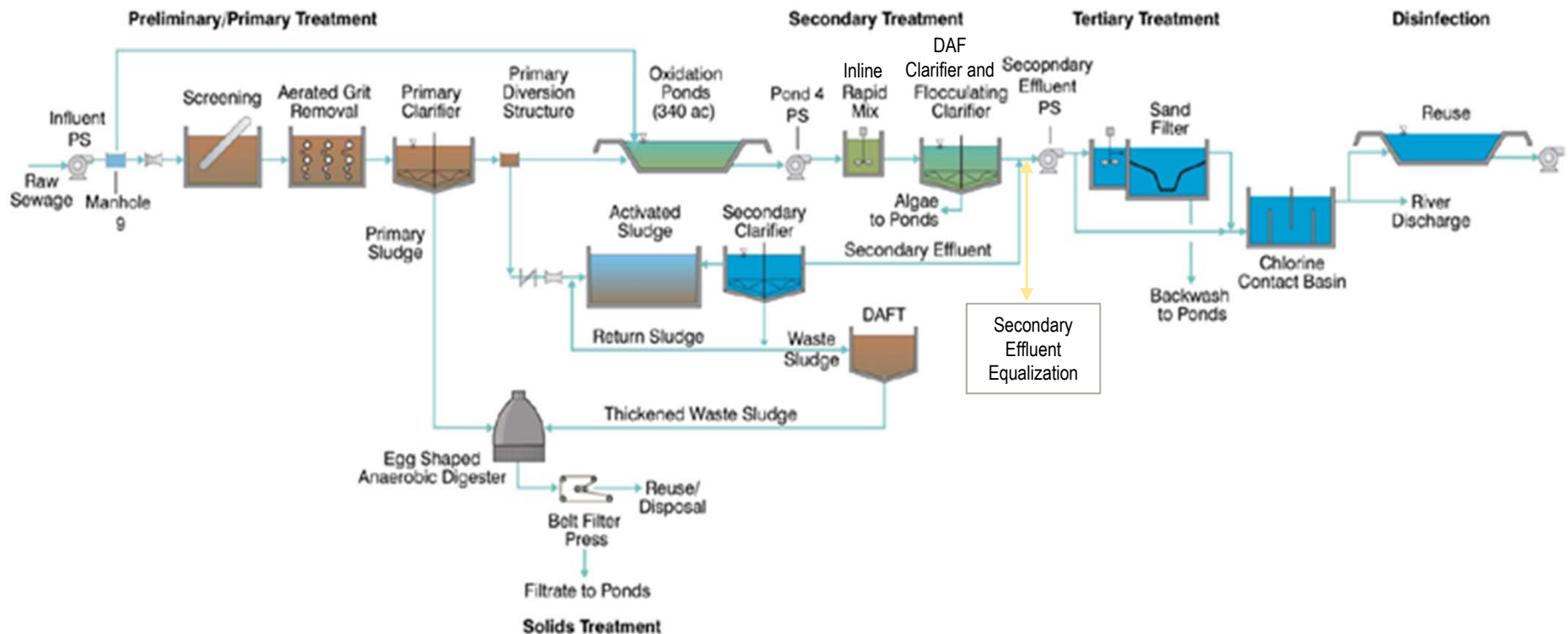
# Napa

Challenging due to ponds and seasonal flow variations



# Challenges at Napa

- Split treatment and seasonal storage
- High ammonia in DAF clarifier effluent seasonally
- Not able to reliably meet Level 2 for TN during the winter
- Limited or no discharge in dry season (May through September)

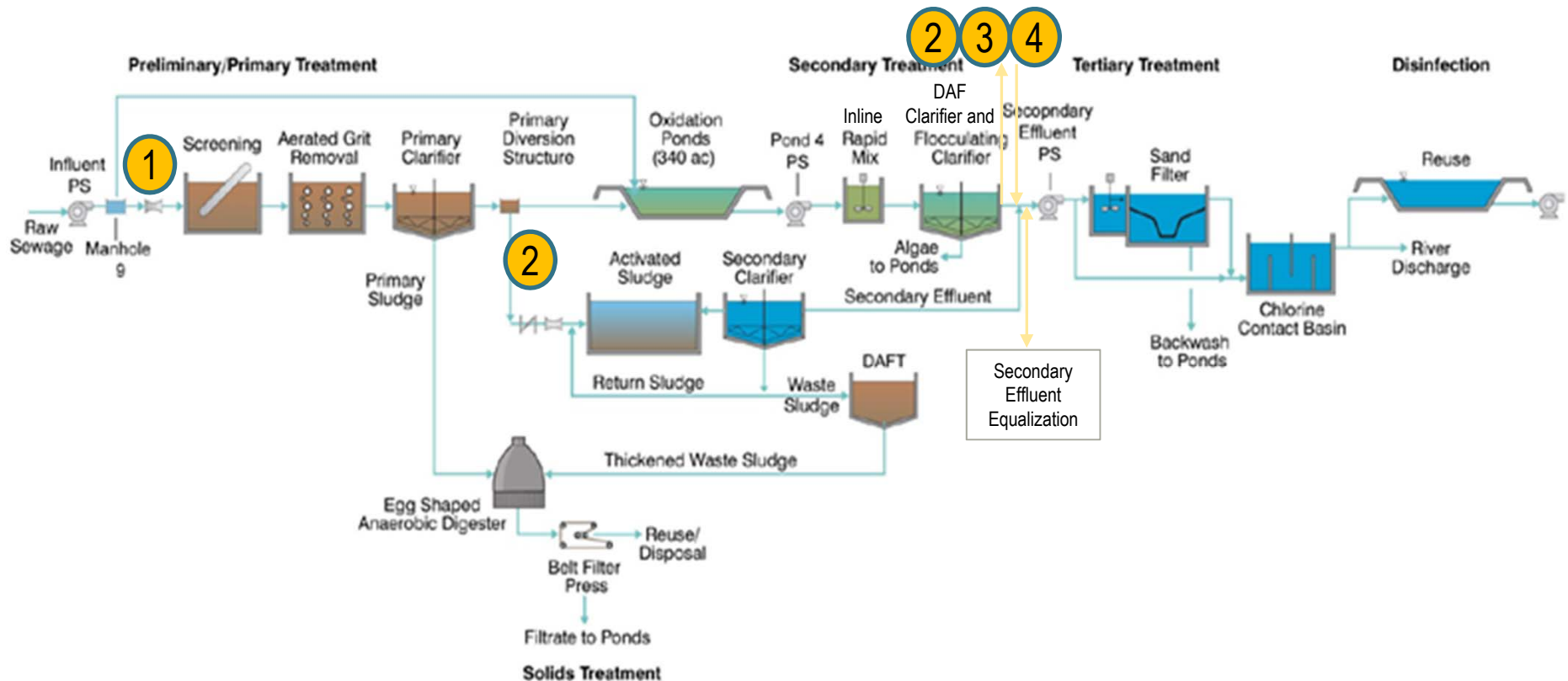


## BACWA Upgrades

Process	Current	Optimize	NNLI	Level 2	Level 3
Primaries with Ferric Addition	Yes	Increase winter dose	Increase dose	Increase winter dose	Increase winter dose
Act Sludge	BNR (Step-feed)	BNR (Step-feed)	BNR (Step-feed)	BNR (Step-feed)	BNR (4-stage)
Alkalinity	Yes	Yes	Yes	Yes	Yes
Ponds / DAF Clarifier	High Strength Ammonia (Seasonal)	High Strength Ammonia (Seasonal)	High Strength Ammonia (Seasonal)	High Strength Ammonia (Seasonal)	High Strength Ammonia (Seasonal)
Act Sludge for DAF Clarifier Effluent	-	-	BNR (4-stage / flexible)	BNR (4-stage / flexible)	BNR (4-stage)
Secondary Clarifier	2	2	3	3	3
Filter	Partial	Partial	Partial	Partial	Expand; add ferric chloride
Carbon	-	-	Yes	Yes	Yes



## Level 2



(1) **Ferric chloride.** Use existing chemical facilities (wet season).

(2) **Methanol.** Add methanol (or other carbon source) (wet season).

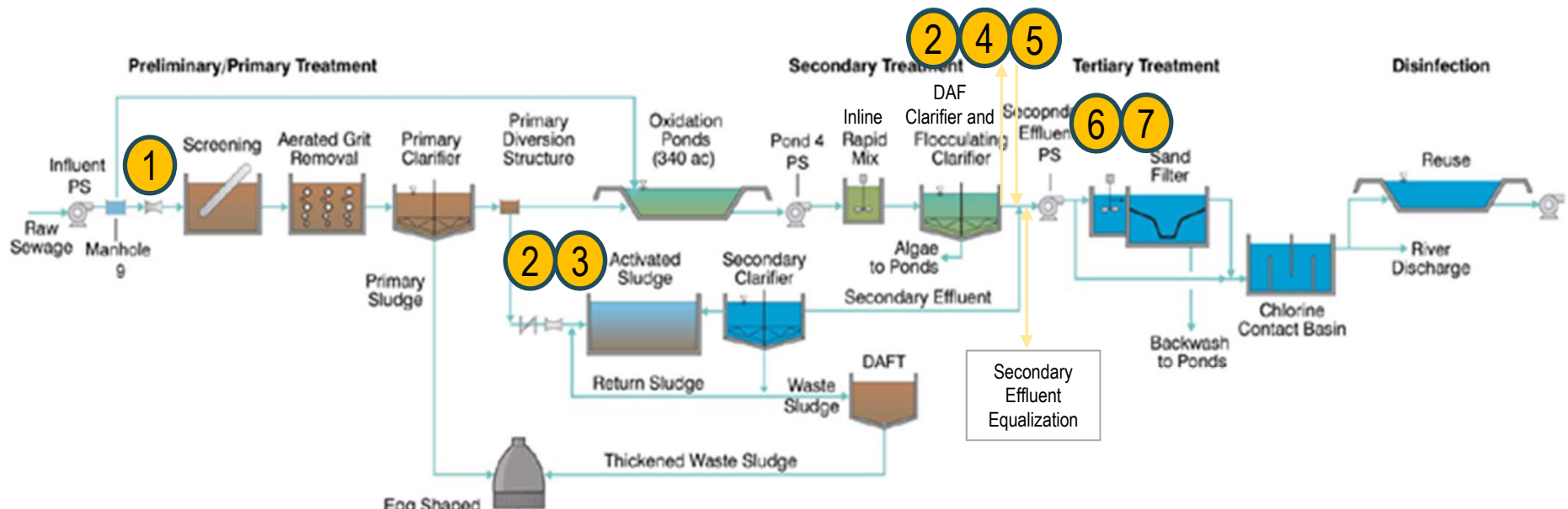
(3) **Aeration Basins.** Add two (flexible configuration with anoxic zones) for nitrification and denitrification of DAF clarifier effluent (wet season only),

(4) **Secondary Clarifier.** Add one (wet season only),

## Level 2



# Level 3



- (1) **Ferric chloride.** Use existing chemical facilities (wet season).
- (2) **Methanol.** Add methanol (or other carbon source) (wet season).
- (3) **Aeration Basins.** Convert to 4-stage BNR and add two basins
- (4) **Aeration Basins.** Add two (flexible configuration with anoxic zones) for nitrification and denitrification of DAF clarifier effluent (wet season only),
- (5) **Secondary Clarifier.** Add one (wet season only),
- (6) **Ferric Chloride.** Before filters.
- (7) **Filters.** Add media to sixth filter cell.



## Level 3



- (1) Aeration Basins (Upgrade)
- (2) Aeration Basins (New)
- (3) Aeration Basins (New)
- (4) Secondary Clarifier
- (5) Filters with Chemical Addition
- (6) Methanol





# **Draft Findings of Nutrient Removal Reports**



# **Preliminary Optimization Results**

# DRAFT Optimization Findings

Which nutrients are easiest to remove?

- Ammonia load reduction is most difficult
  - Increasing SRT for plants with act sludge
  - Operating Trickling Filter as a Nitrifying Trickling filter
- TN load reduction is possible if ammonia removal implemented
- TP load is easier to remove
  - Most plants already have metal salt chemical feed facilities
  - Some have anaerobic zones
  - Lose TP removal capability by forfeiting anaerobic zone

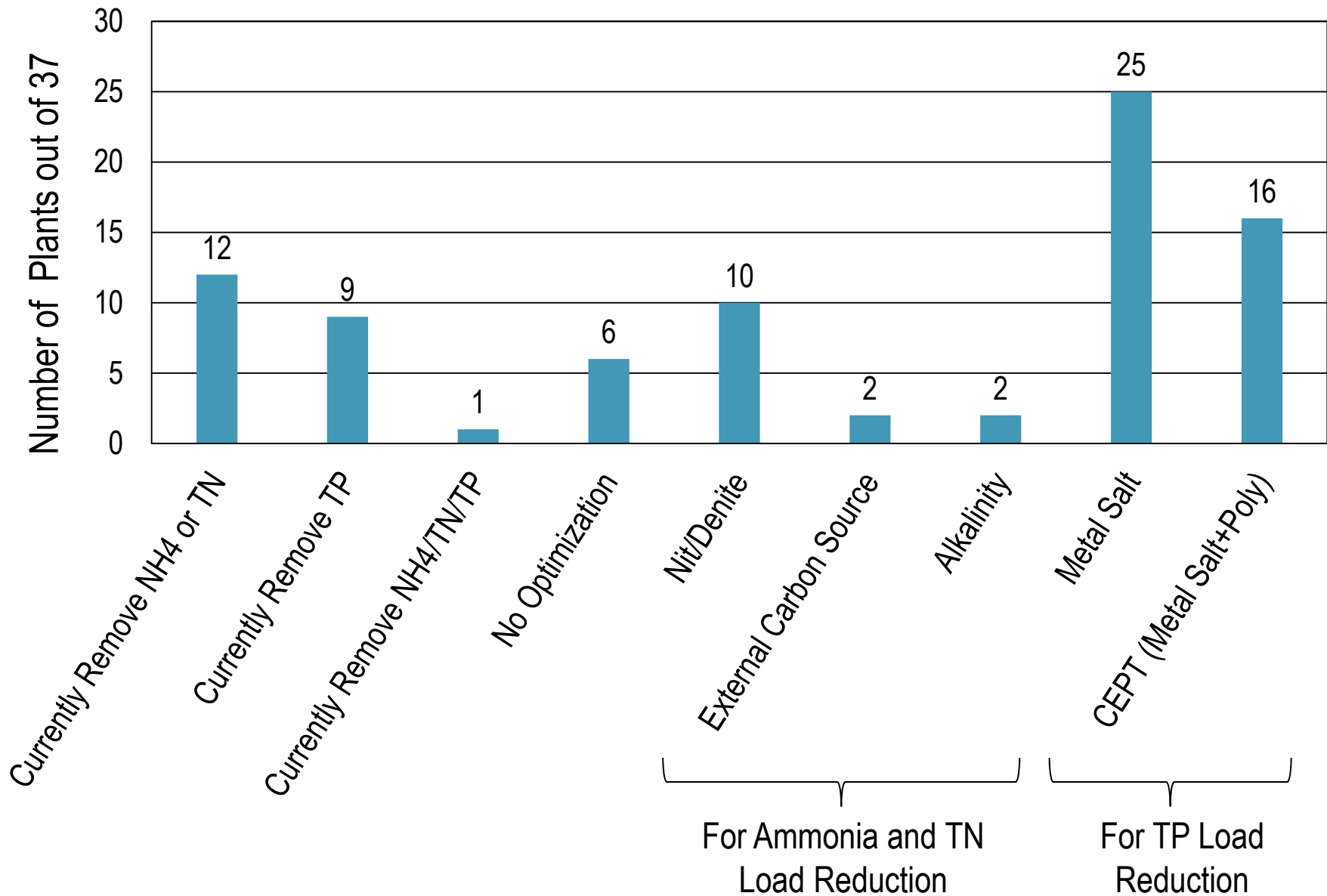
Costs

- Total PV
  - \$180M Dry and \$223M Wet
  - Ranged from \$0.4M to \$28M per plant
- Unit Costs
  - Flow-weighted Total PV unit cost = ~\$0.4/gpd
  - Flow-weighted Total PV/lb N rem = ~\$1.4/lb N
  - Flow-weighted Total PV/lb P rem = ~\$12/lb P
- Not all plants can reduce ammonia/TN loads for both dry and wet seasons:
  - 21 of 37 plants for dry season reduction
  - 19 of 37 plants for wet season reduction

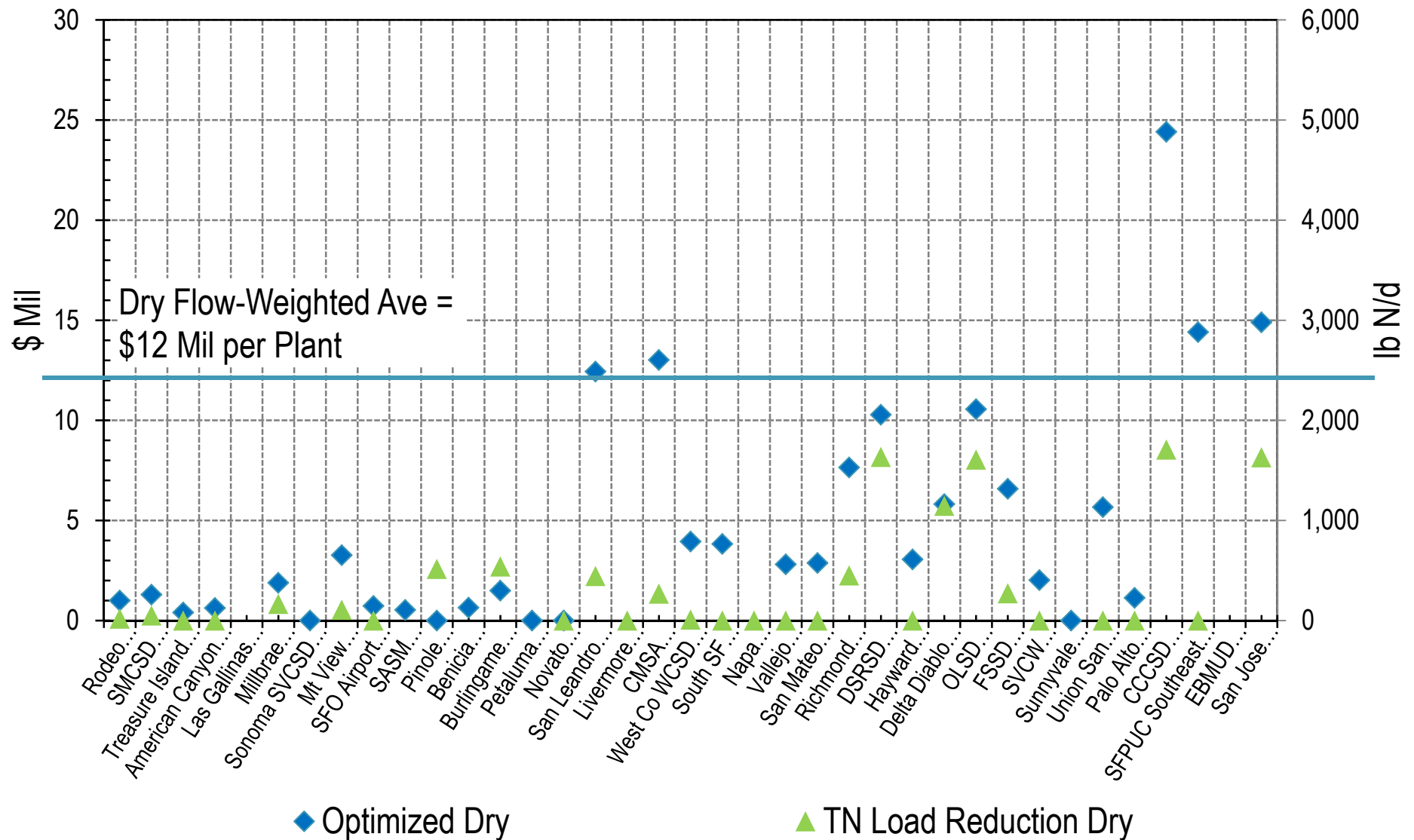
Load Reduction w/Respect to Current Discharge:

- Ammonia load reduction is 18%
- TN load reduction is 10%
- Overall TP load reduction is 44%

# Summary of DRAFT Optimization Findings

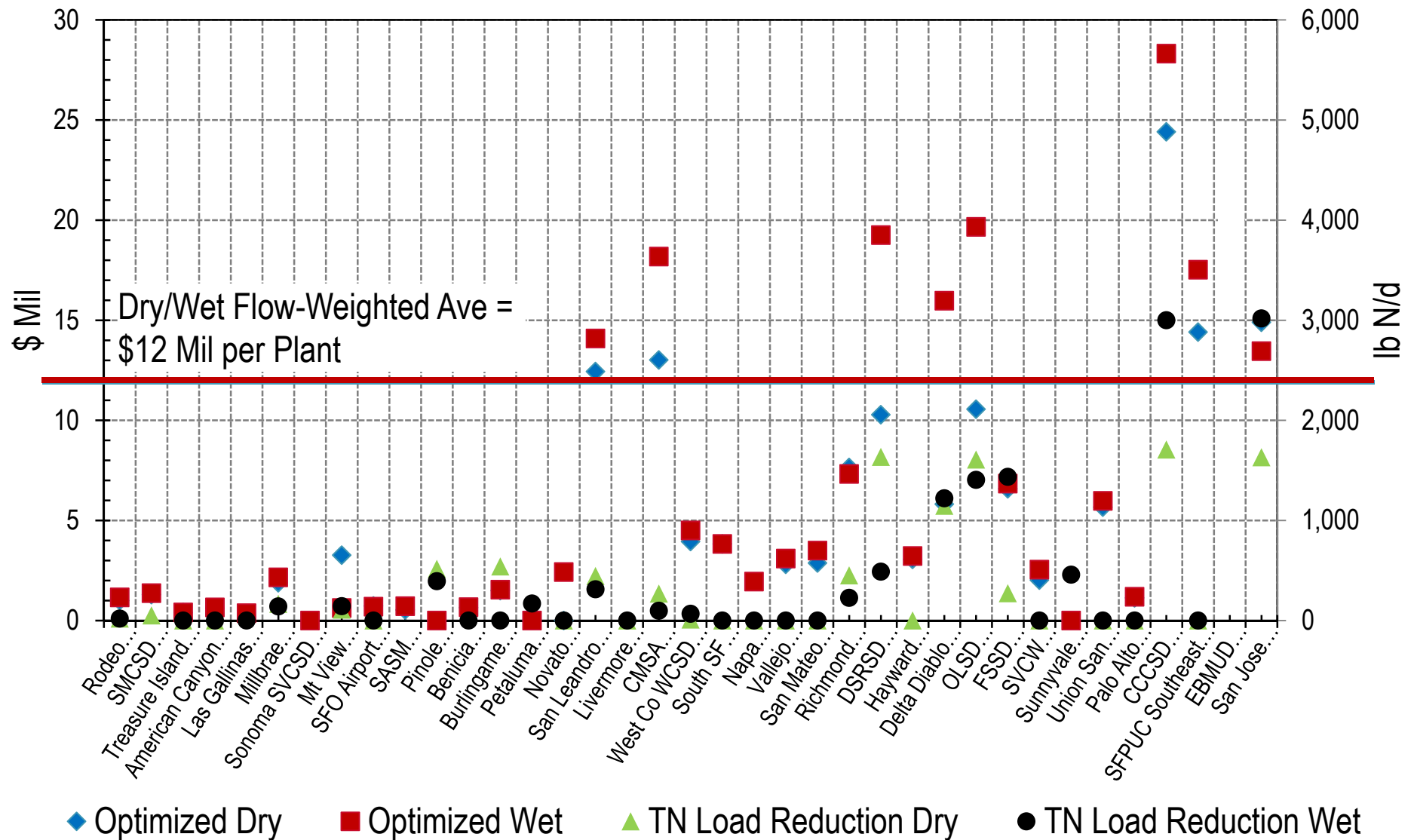


# DRAFT Optimization Total PV Costs



\*Draft Results are Sorted by Permitted Capacity

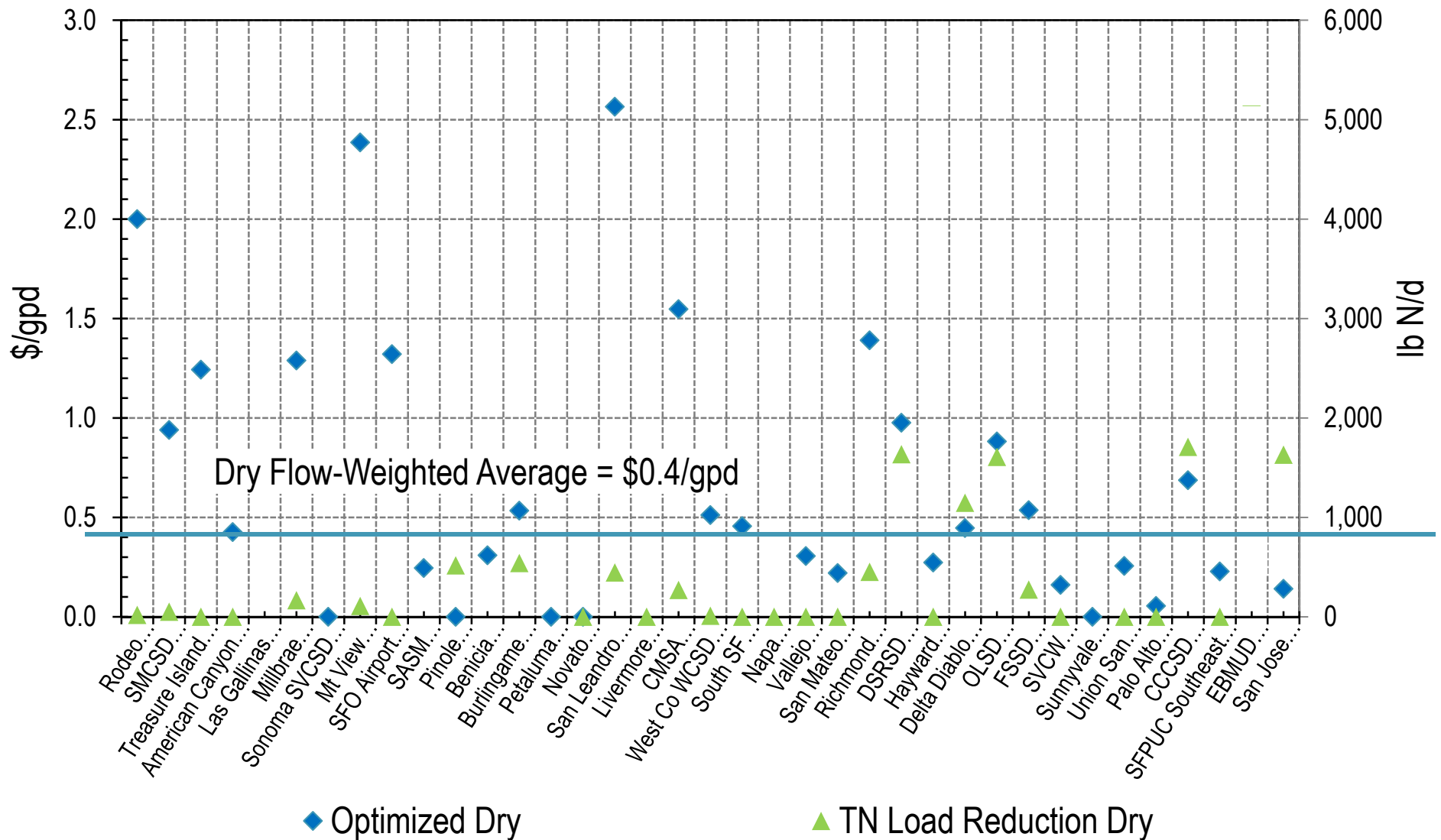
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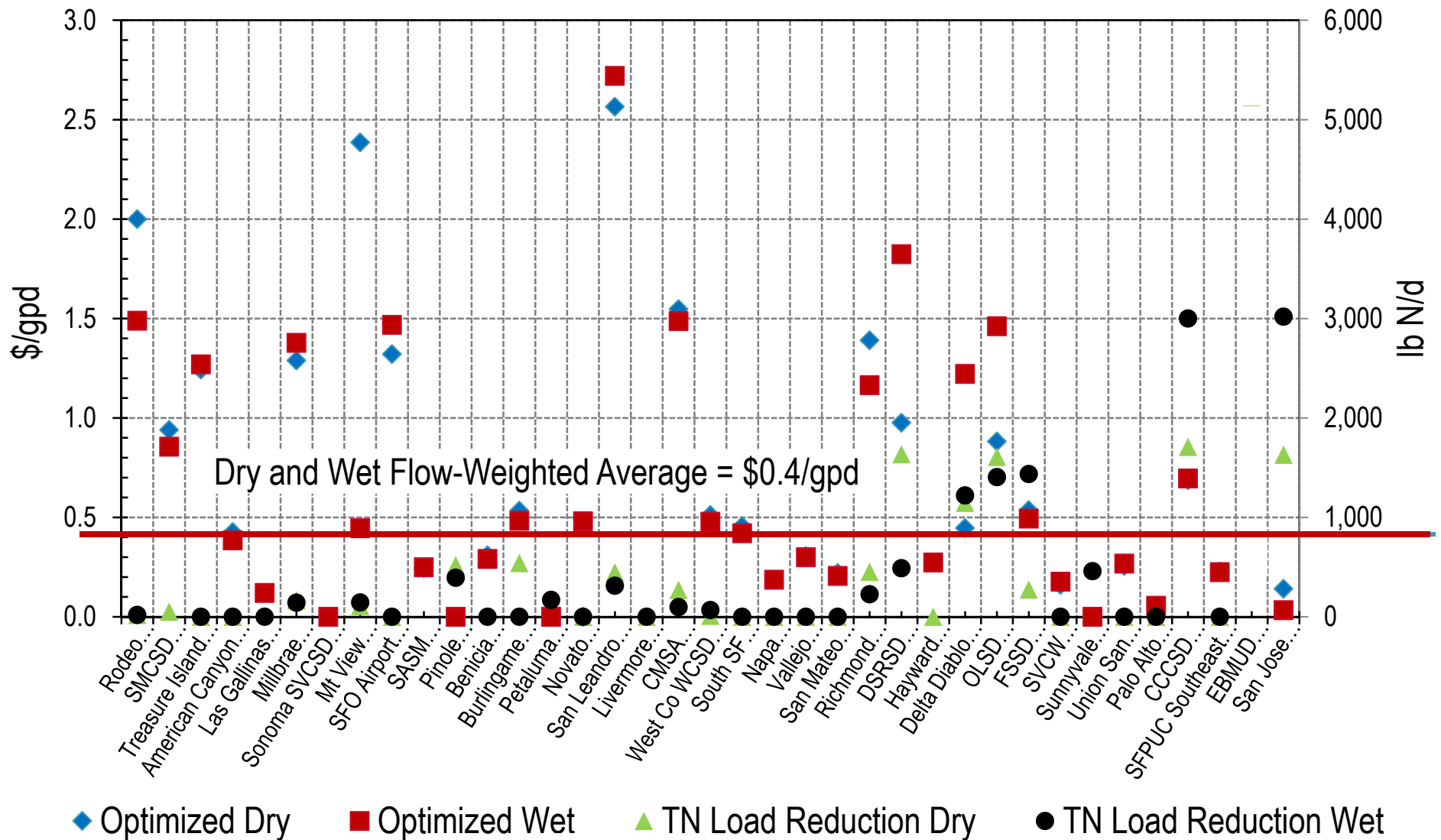


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Load Reduction w/Respect to Current Discharge:

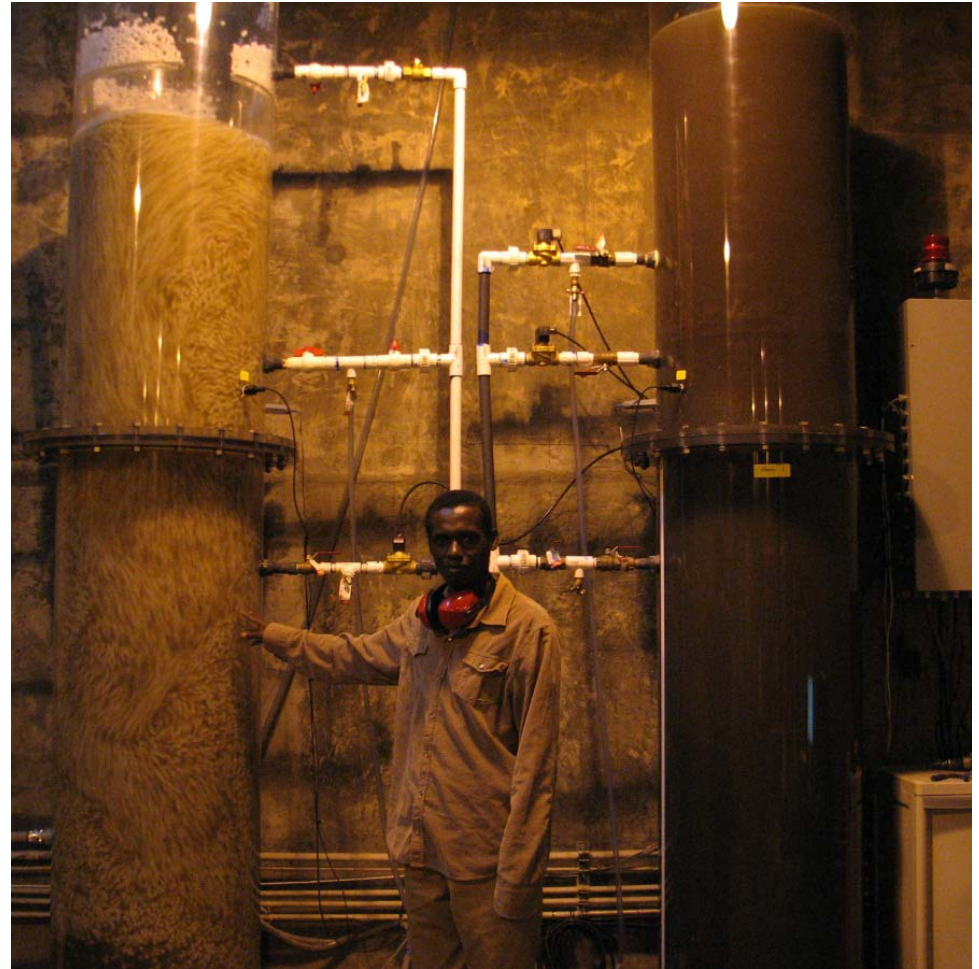
- Ammonia load reduction is 18%
- TN load reduction is 10%
- Overall TP load reduction is 44%



# **Preliminary Sidestream Results**

# Sidestream Approach

- Basis of Evaluation
  - Identify upgrade strategies to reduce nutrients
  - Planning Period: 30 Years
  - Loading: Design Capacity
  - Design Criteria:
    - Year-round sidestream
    - Sufficient Dewatering Frequency ( $\geq 4$  days/week)
    - Water temperature governs technology selection
- Concepts
  - Ammonia/TN Removal:
    - Conventional nitrification technology
    - Deammonification technology
  - TP Removal: metal salt precipitation
- Acknowledgements
  - EPA Regional Grant led by EBMUD
  - Agencies that hosted pilots



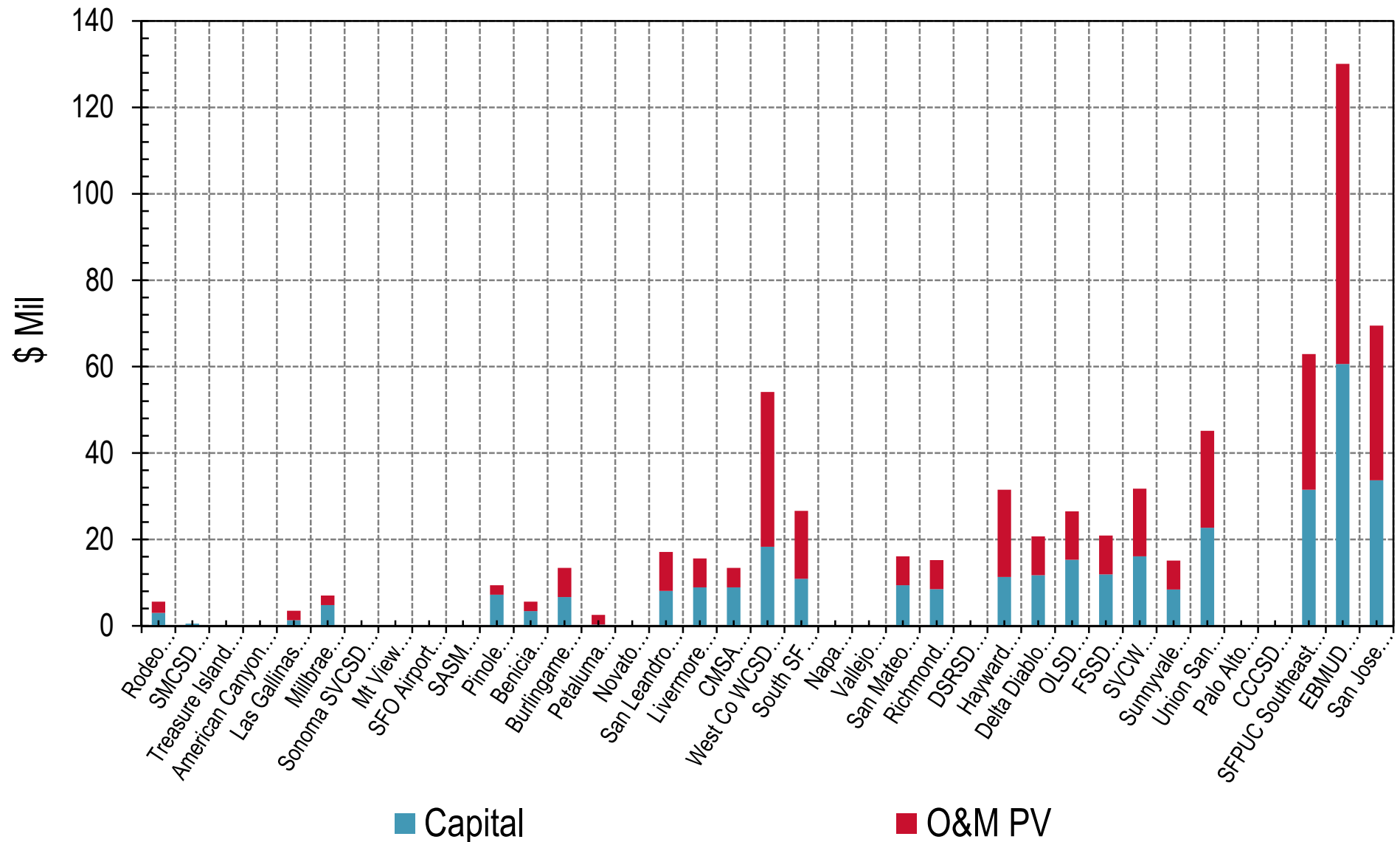


## **DRAFT Plants Eligible for Sidestream Treatment by Subembayment**

Subembayment	No. Plants Eligible for Ammonia Discharge Reduction to the Bay	No. Plants Eligible for Total Nitrogen Discharge Reduction to the Bay
Suisun Bay	1	3
San Pablo Bay	1	4
Central Bay	4	5
South Bay	10	11
Lower South Bay	0	2
Total	16	25



# DRAFT Total PV Costs for Sidestream



\*Draft Results are Sorted by Permitted Capacity

# DRAFT Sidestream Findings

- Criteria used for screening:
  - Year-round sidestream
  - Year-round discharge
  - Sufficient dewatering frequency ( $\geq 4$  days/week)
- Number of candidate plants
  - 16 out of 37 plants if ammonia reduction is the discharge objective
  - 25 out of 37 plants if TN reduction is the discharge objective
- Costs
  - The Total PV costs is \$660 Mil
  - Flow-weighted average = \$1.7/lb N removed
- The overall Ammonia/TN load reduction from Current Discharge is 21 and 17 percent, respectively





# **Preliminary Upgrades Results**

# DRAFT Upgrade Findings

Which nutrients are easiest to remove?

- Ammonia is the most difficult and expensive
  - Bigger basins due to increasing SRT for act sludge plants
  - Expanded aeration system
  - Additional pumping
- TN load reduction requires ammonia removal
  - Level 3 typically require an external carbon source
- TP load reduction is the simplest/most straight forward
  - Level 3 requires tertiary filtration
  - Upgrades use MBR which includes filtration in Level 2
- Number of Plants Already/Planning to Meet Targets:
  - Level 2: 6
  - Level 3: 1

\* Excludes San Jose

\*\* Excludes Sunnyvale

Costs

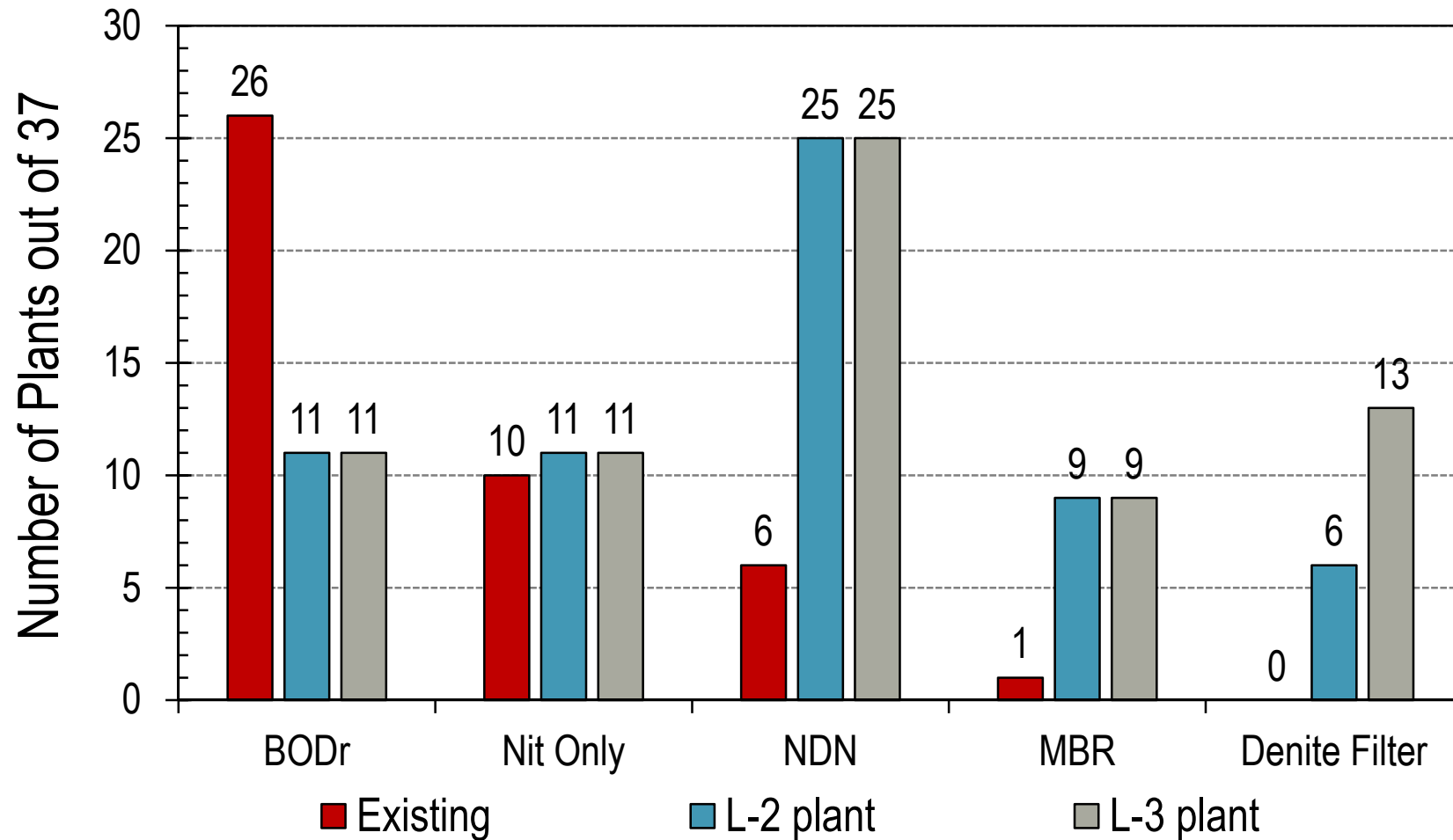
- Total PV Costs
  - Level 2 = \$6,430M Dry and \$8,050M Wet
  - Level 3 = \$8,350M Dry and \$10,370M Wet
- Total PV Cost Range per Plant
  - Level 2 = \$3.8M to \$2,240M per plant
  - Level 3 = \$21M to \$2,470M per plant
- Unit Costs
  - Level 2: \$6/lb N Dry\* and \$8/lb N Wet  
\$34/lb P Dry and \$29/lb P Wet
  - Level 3: \$12/lb N Dry\*\* and \$6/lb N Wet\*\*  
>\$60/lb P for Dry or Wet

Parameter	Level 2 Load Reduction	Level 3 Load Reduction
Ammonia	>88%	>88%
Total N	>61%	>84%
Total P	>63%	>89%

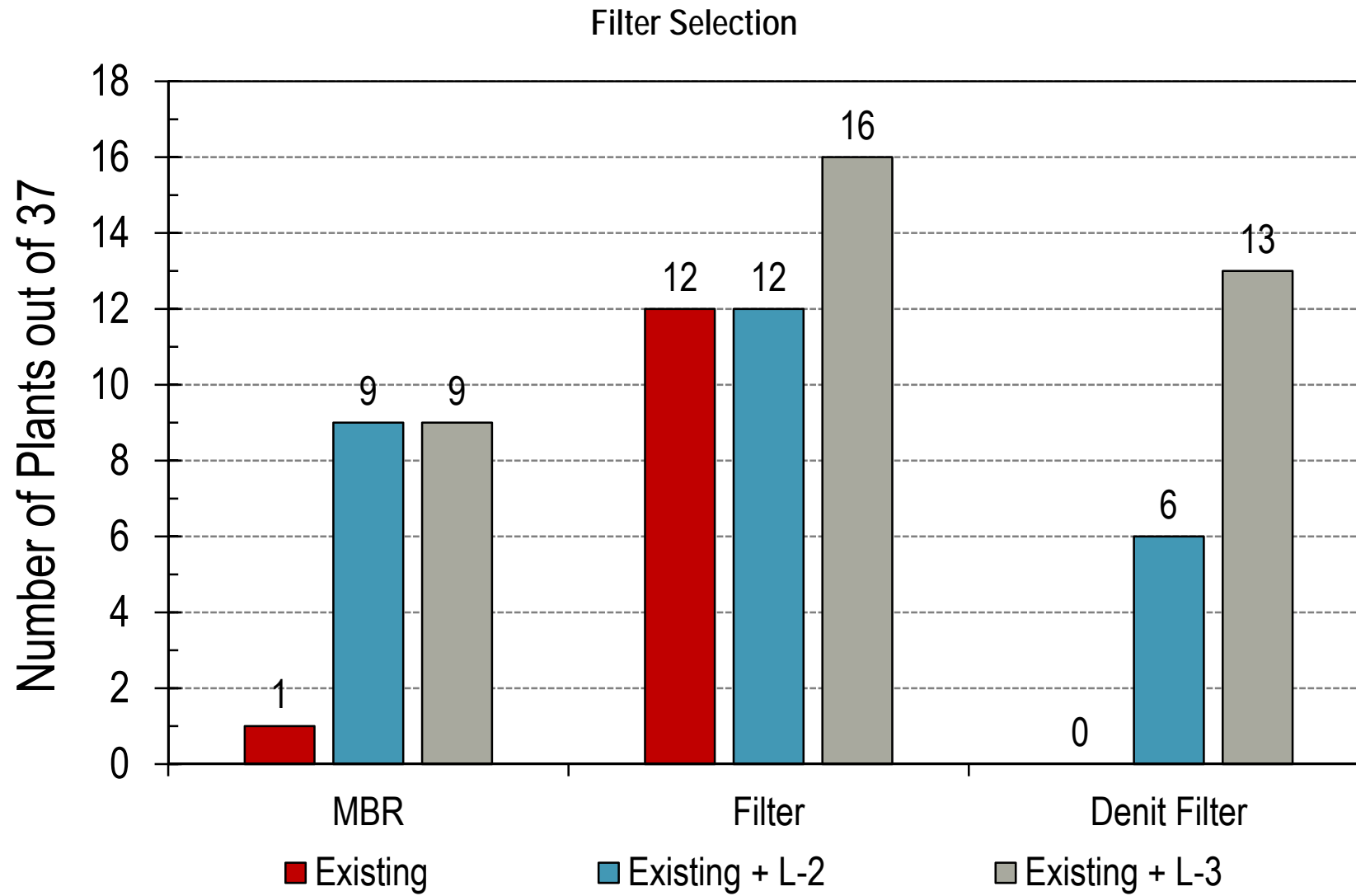


# Summary of DRAFT Upgrades Findings

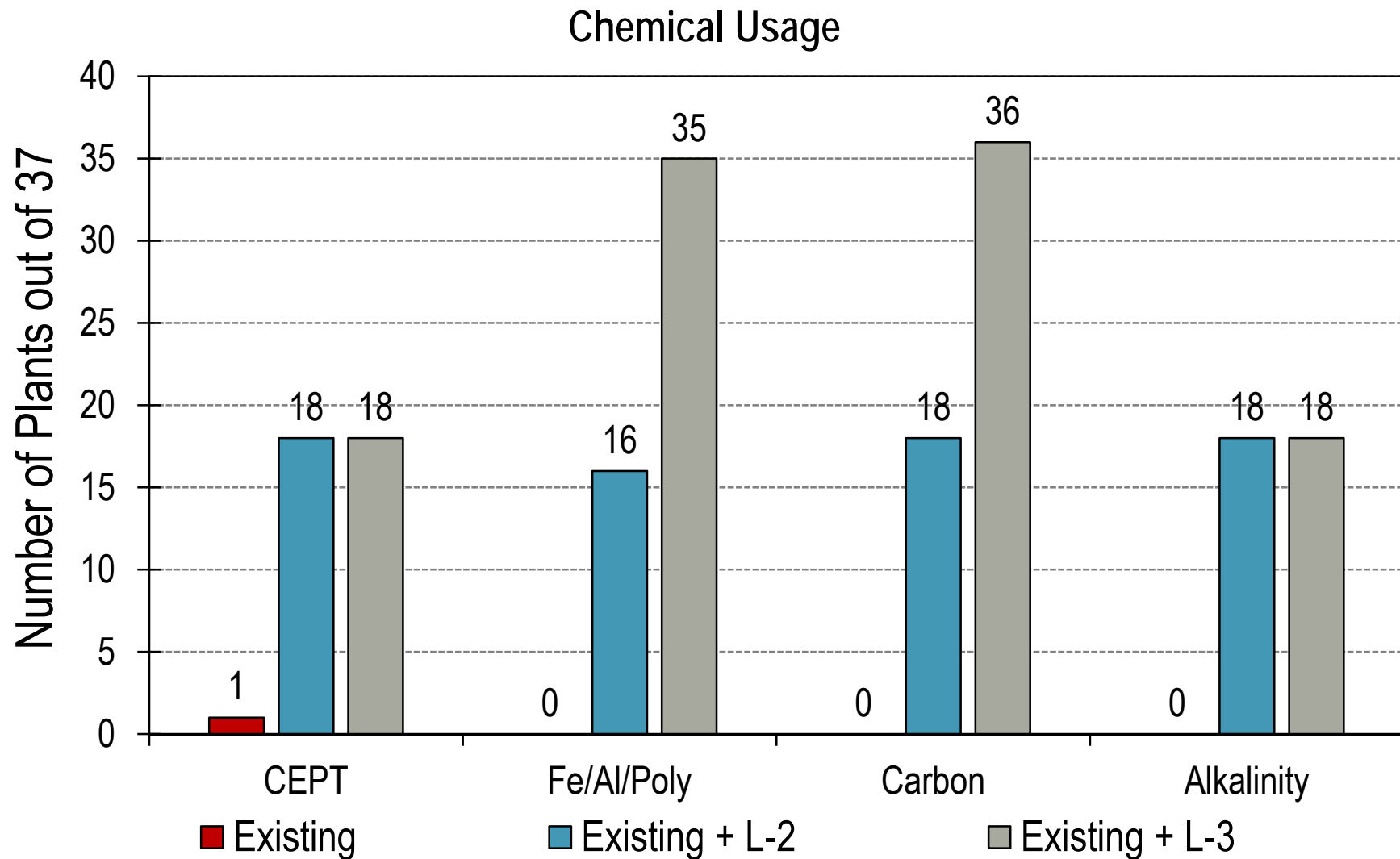
## Biological Process Selection for Ammonia/TN Load Reduction



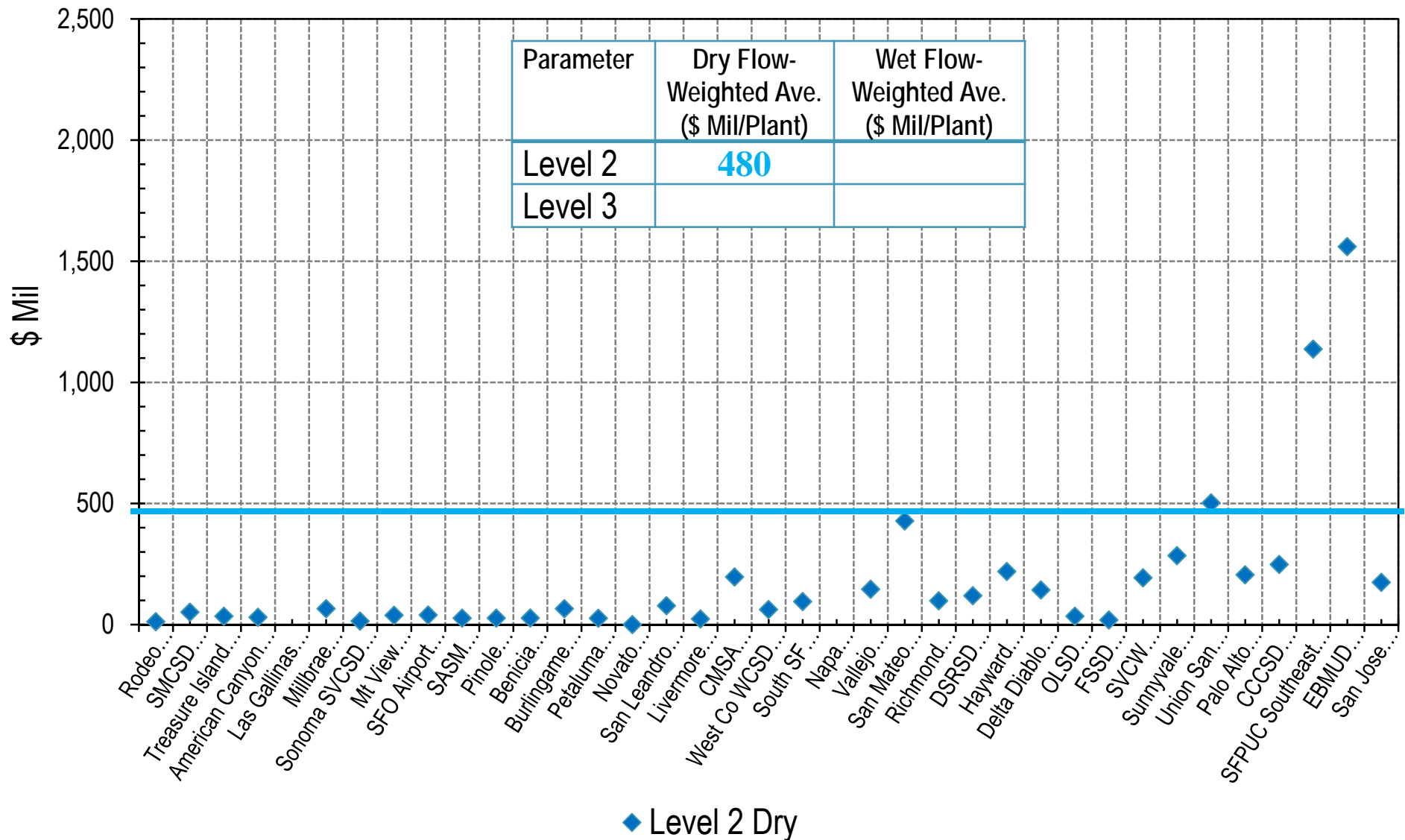
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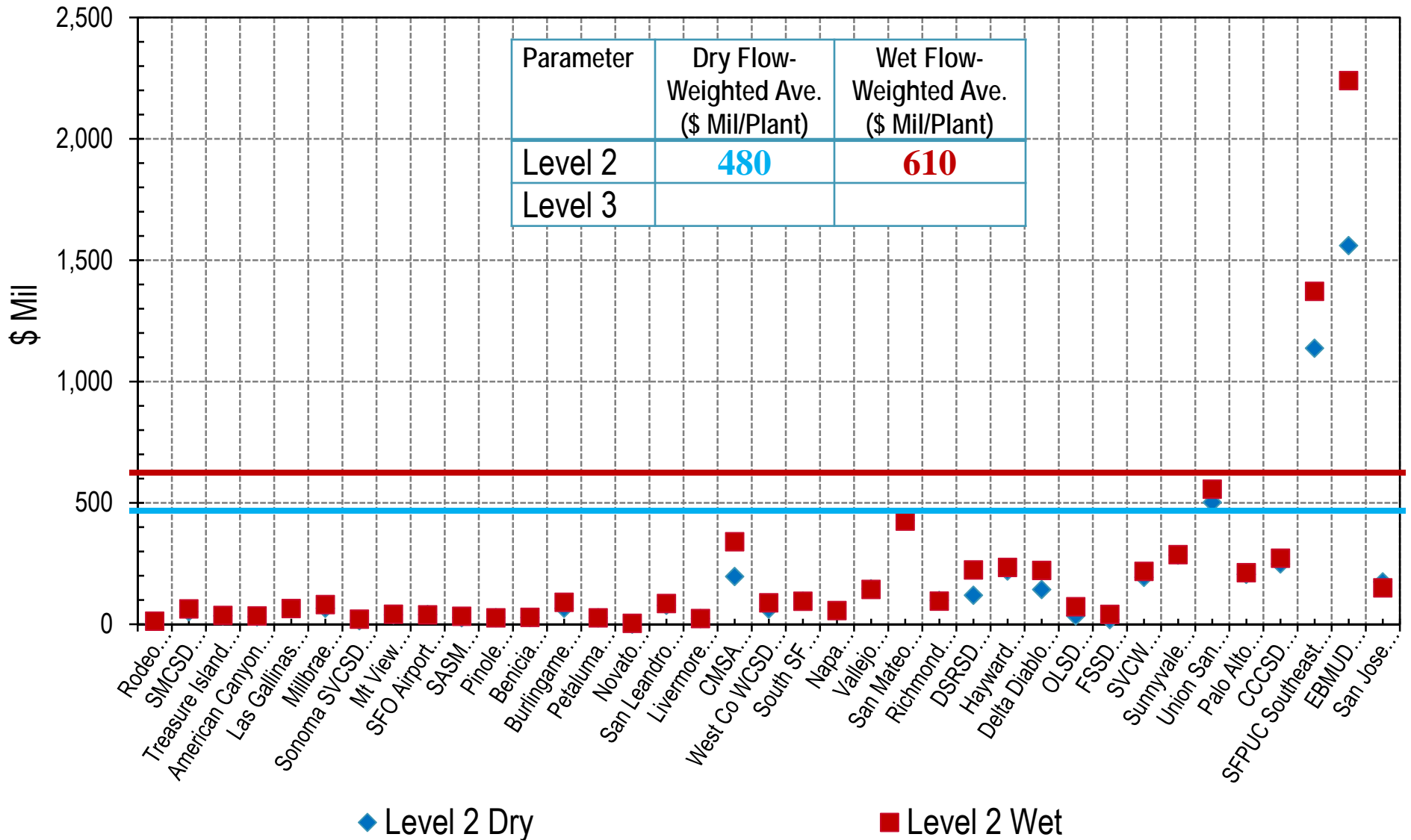
# DRAFT Total PV Costs for Upgrades



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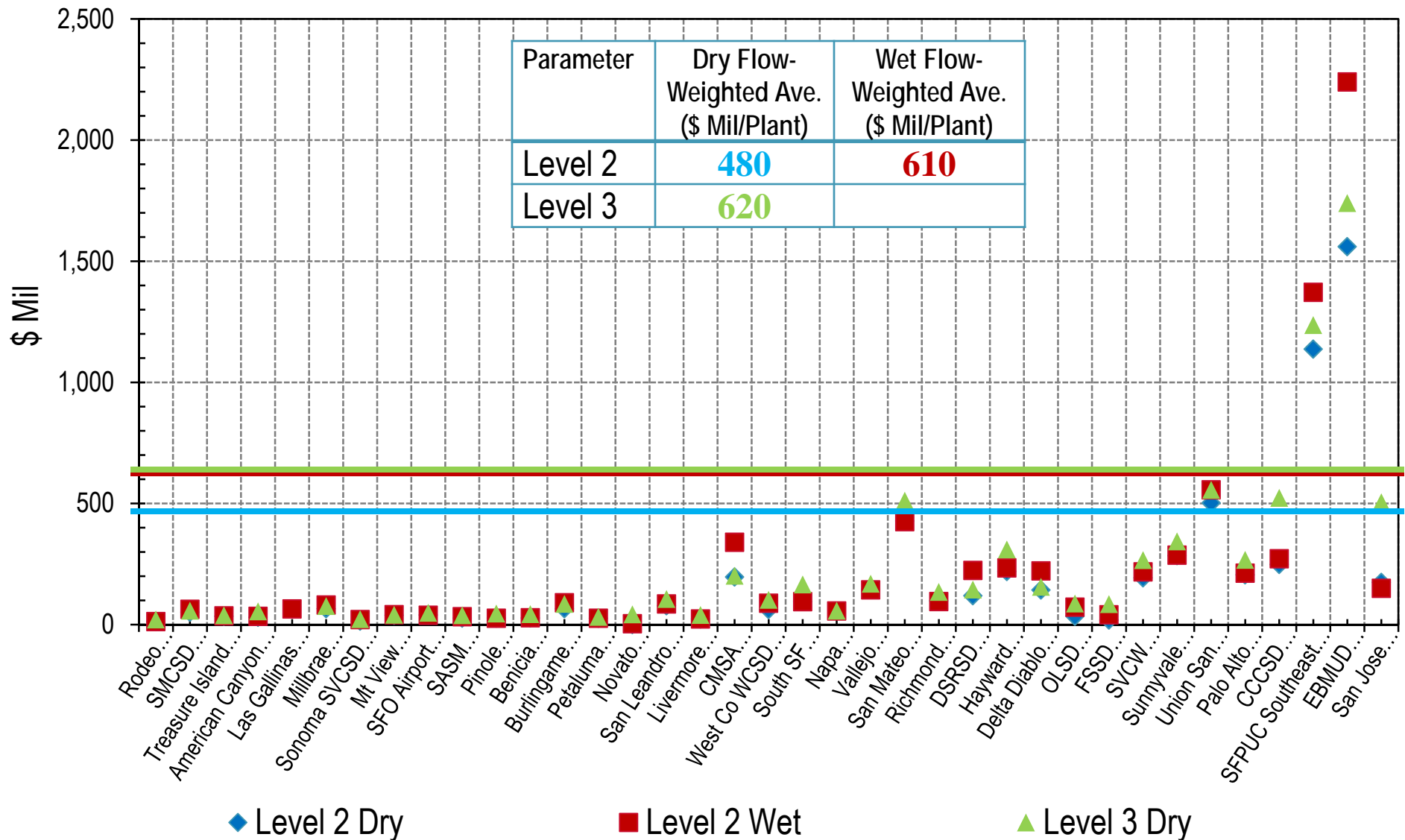


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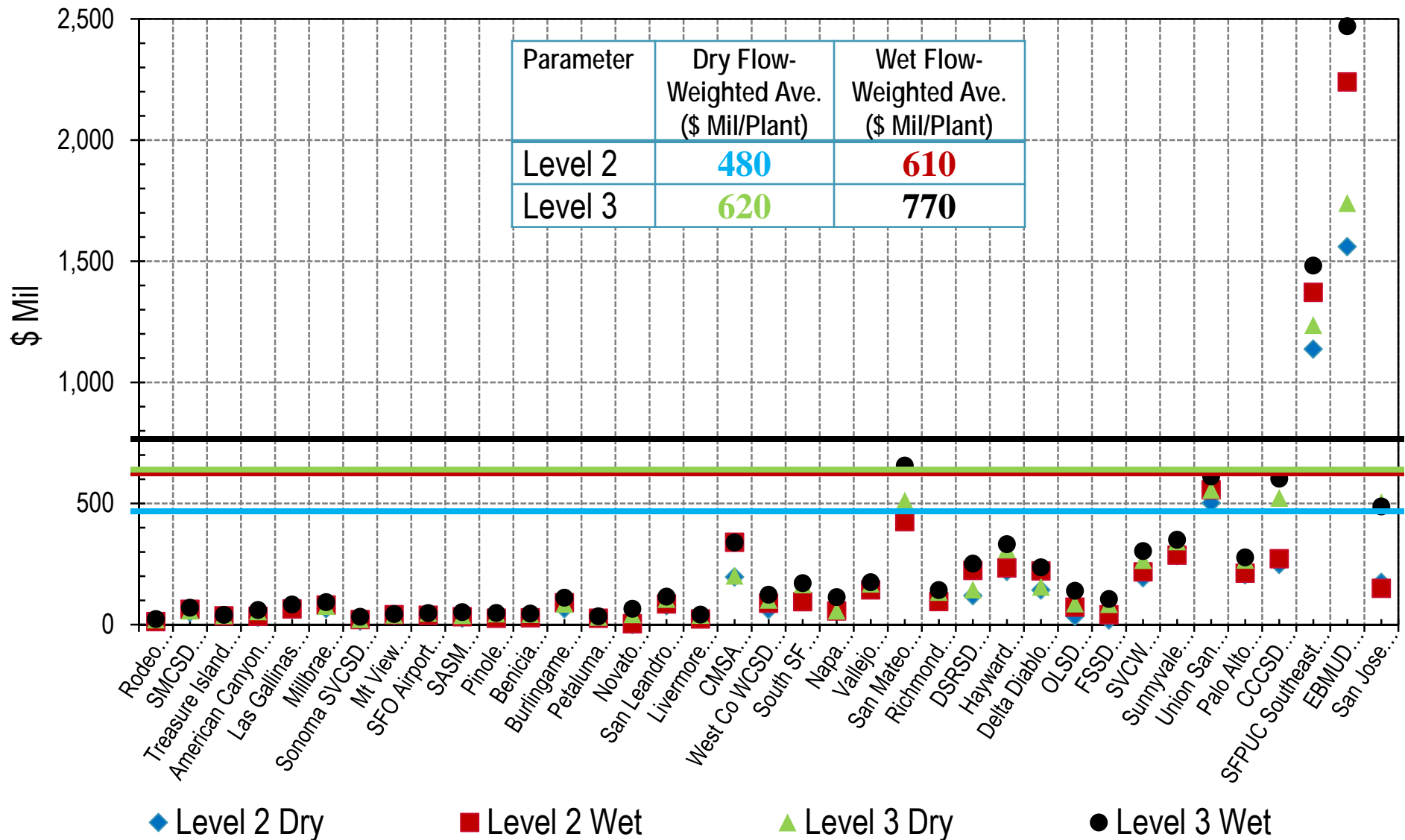
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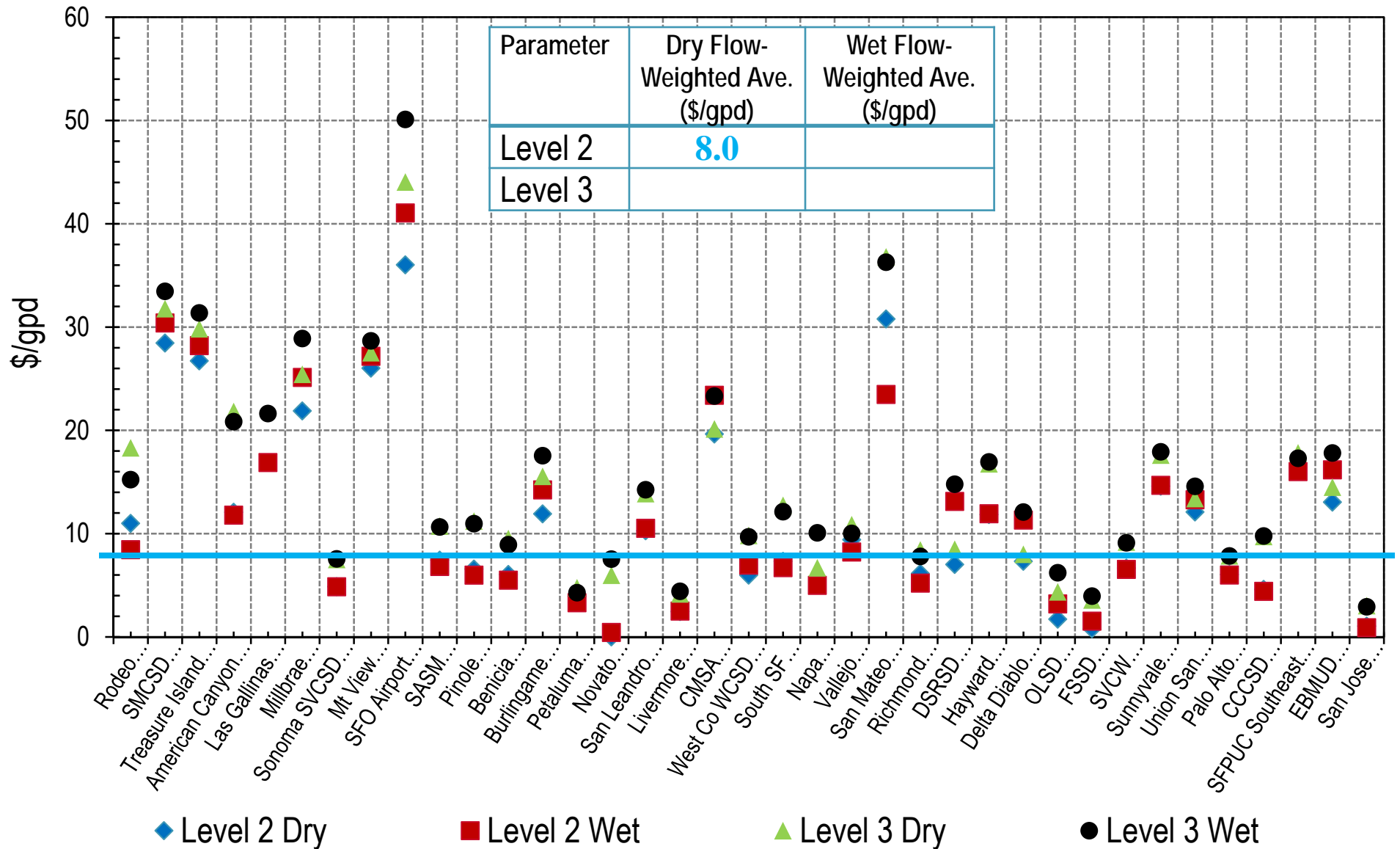
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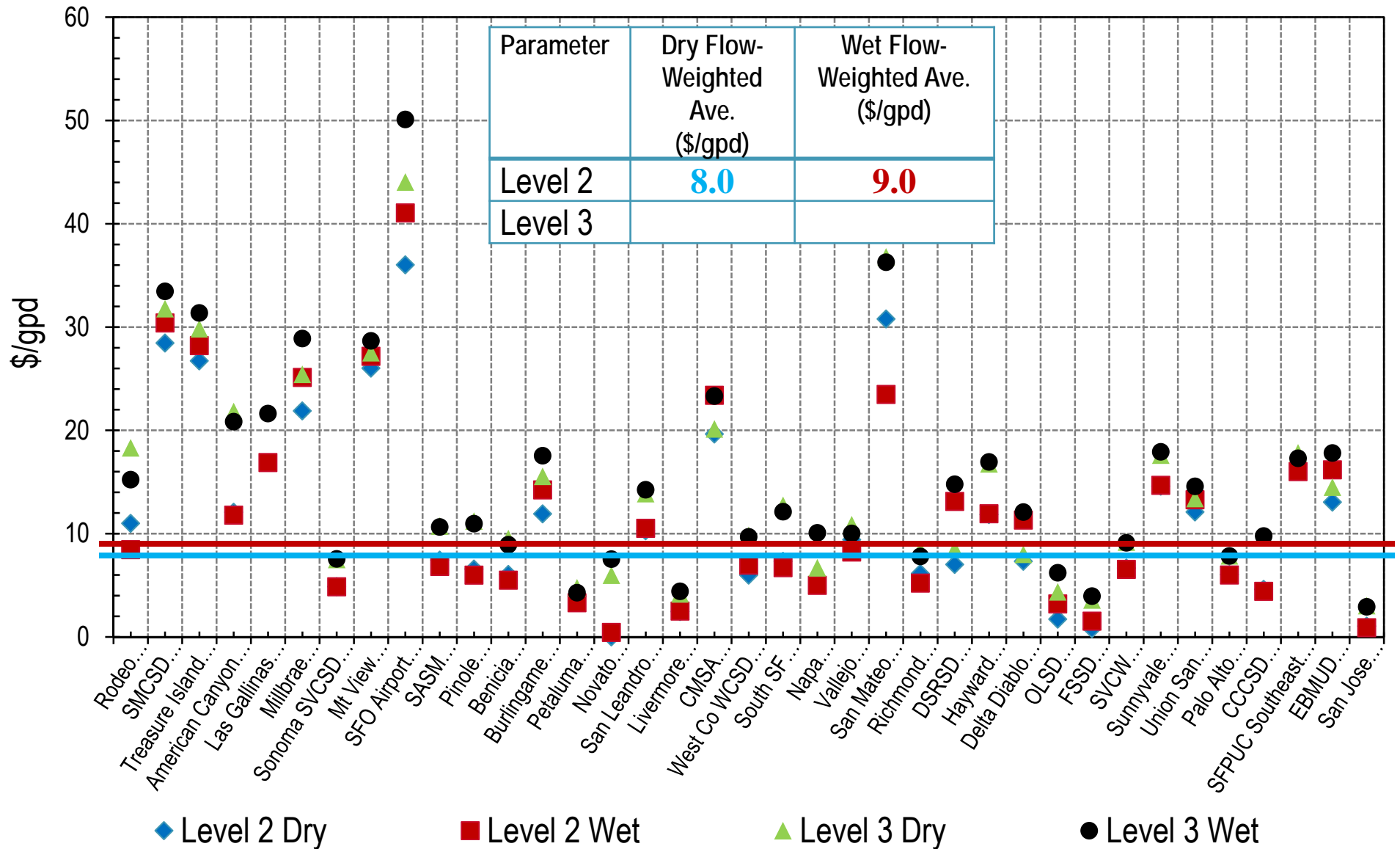
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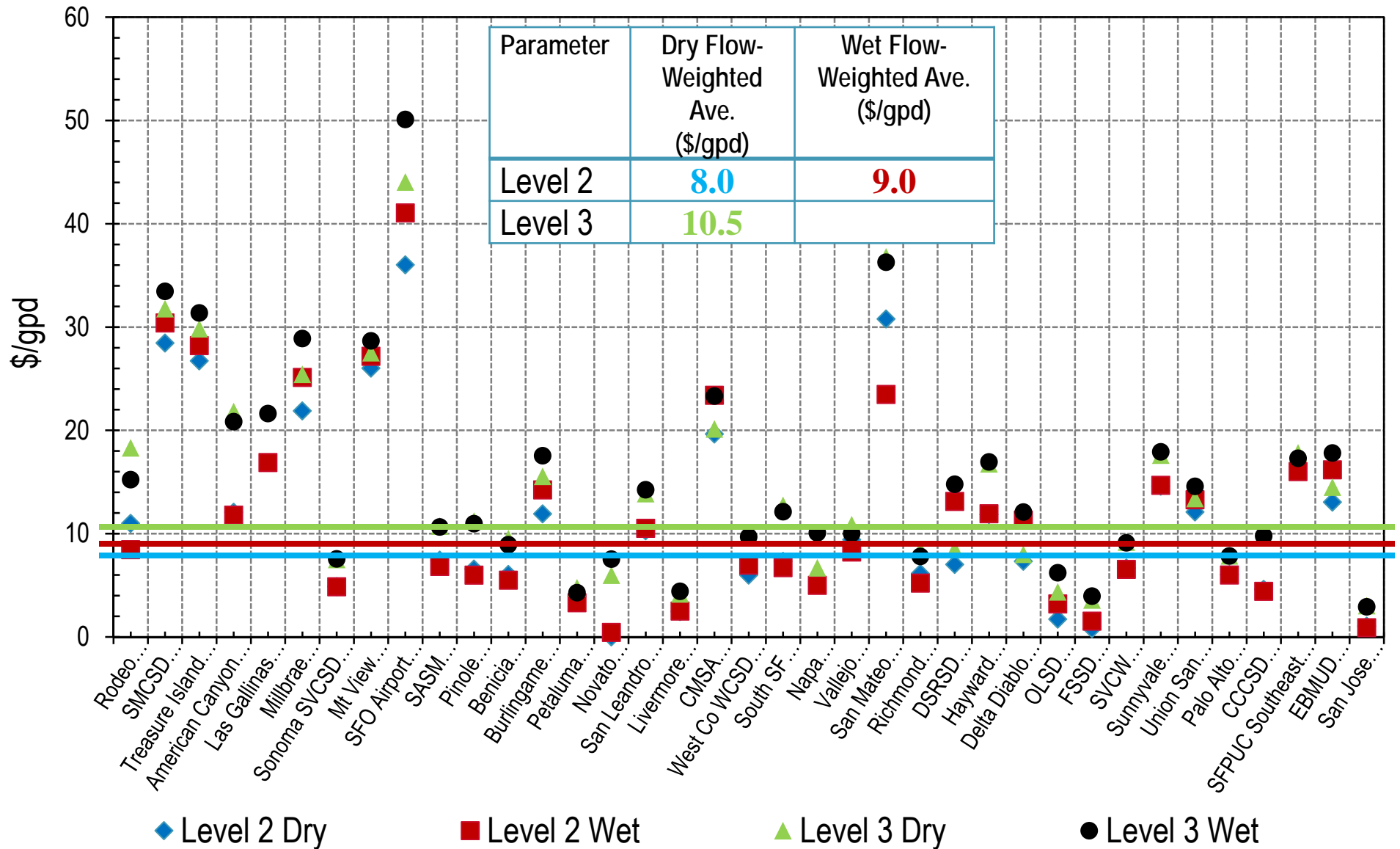


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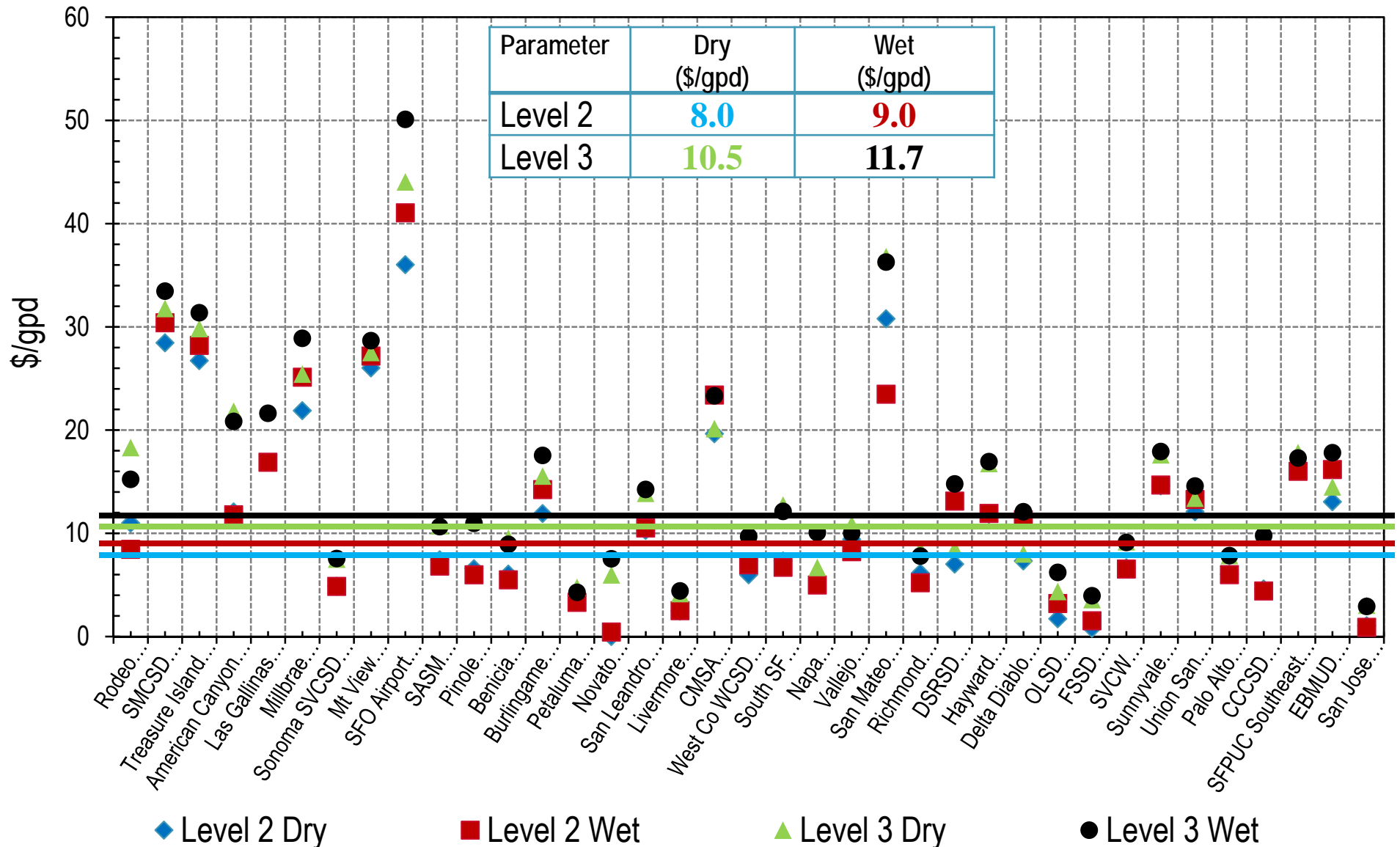
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## **Preliminary No Net Load Increase (NNLI) Results**



# DRAFT NNLI Findings

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- Ammonia is the most difficult and expensive
  - Bigger basins due to increasing SRT for plants with act sludge
  - Expanded aeration system
  - Additional pumping
- TN load reduction requires ammonia removal
  - An external carbon source occasionally required
- TP load is the simplest and most straight forward to remove
  - Typically CEPT or Biological P removal
  - Tertiary filtration typically not required

PV Costs for 29 Plants

- Total PV = \$1.4B Dry and \$1.6B Wet
- Total PV ranged from \$5.1M to \$408M per plant

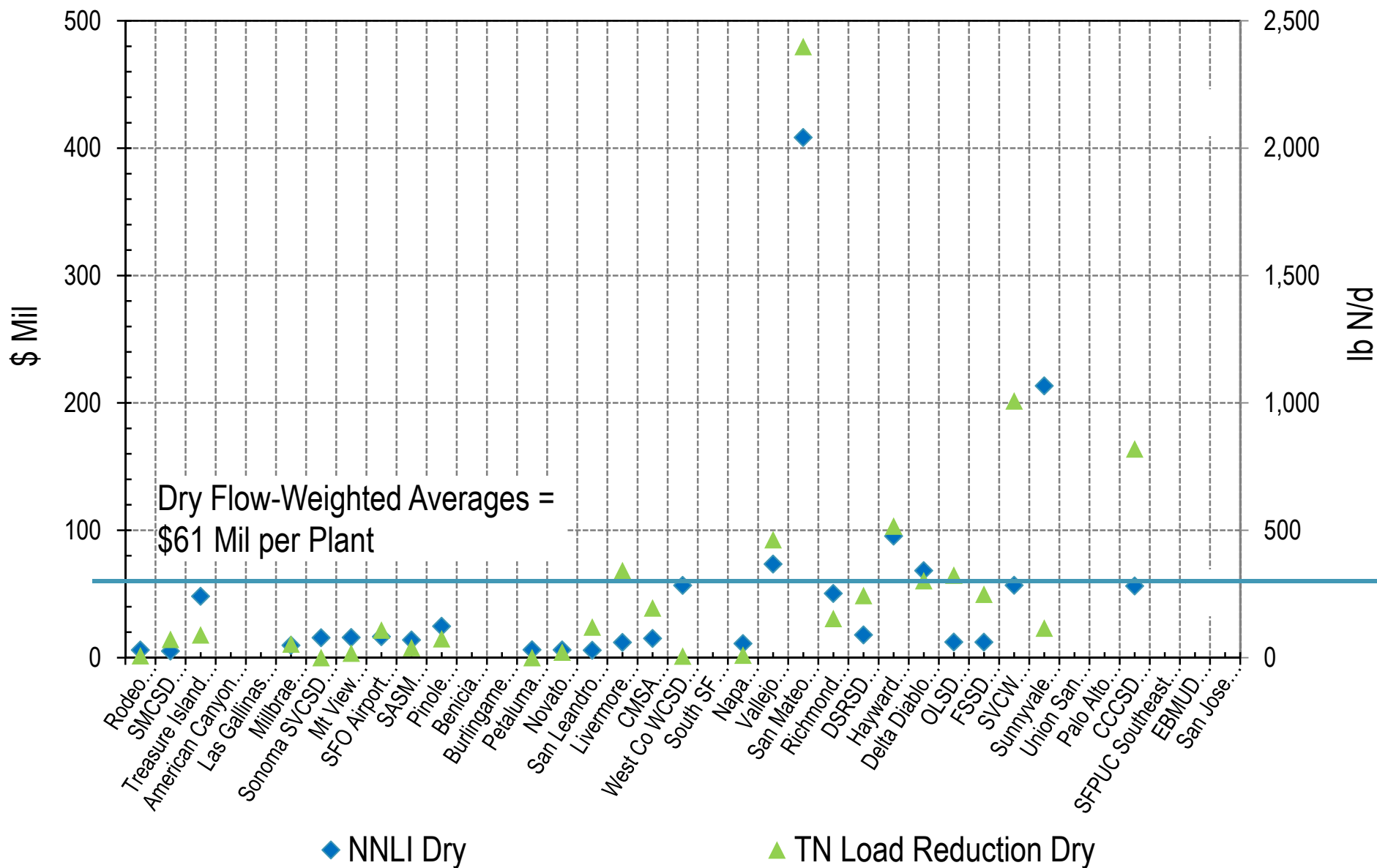
Unit Costs for 29 Plants:

- Flow-weighted Total PV unit cost = \$4/gpd for both Dry and Wet
- TN: \$42 lb N Dry and \$17/lb N Wet
- TP: \$88 lb P Dry and \$72/lb P Wet

Load Reduction for 29 Plants:

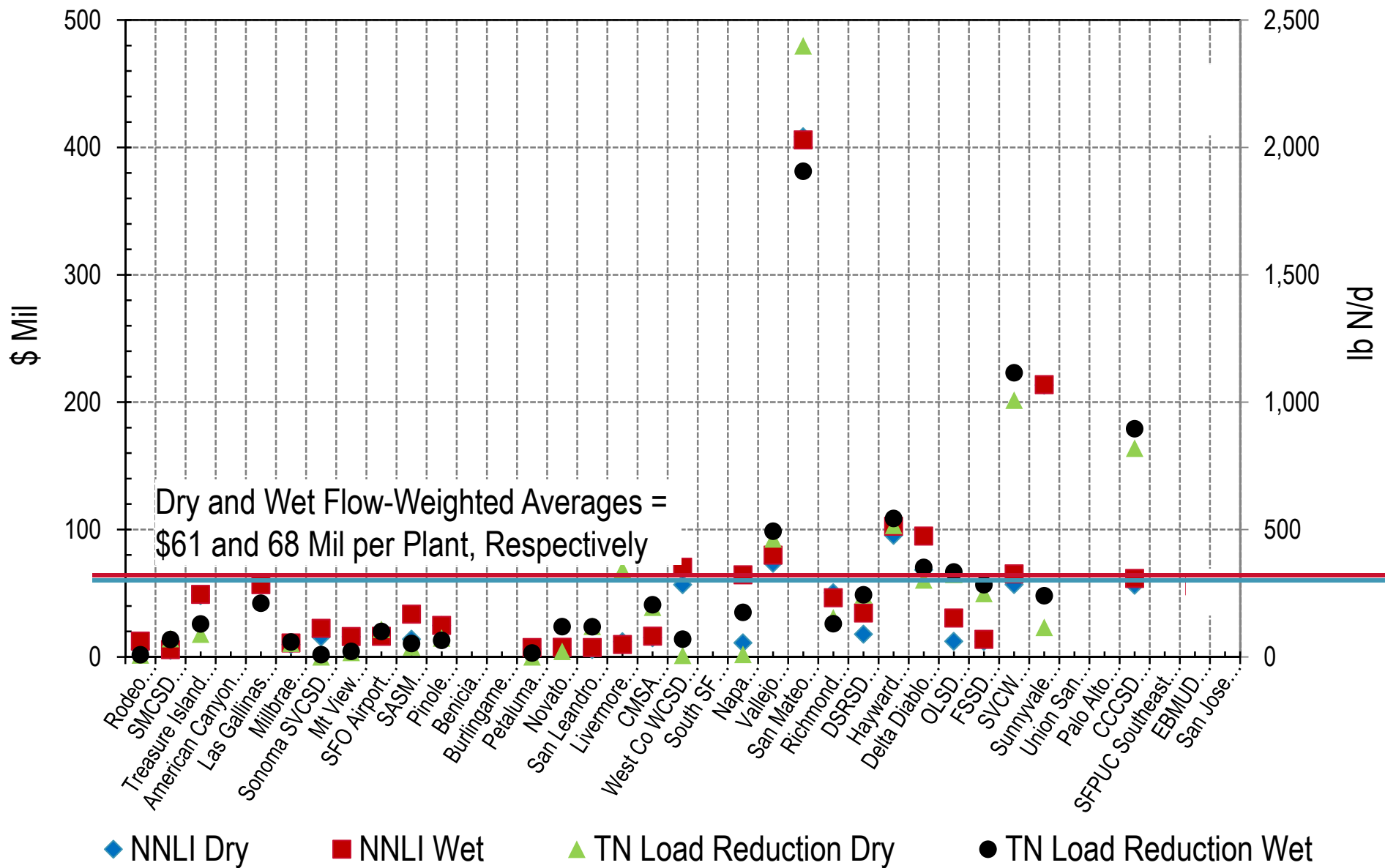
- TN load reduction = 10,700 lb N/d  
(15% w/respect to 29 Plants Current Discharge)
- TP load reduction = 930 lb P/d  
(16% w/respect to 29 Plants Current Discharge)

# DRAFT NNLI Total PV Costs



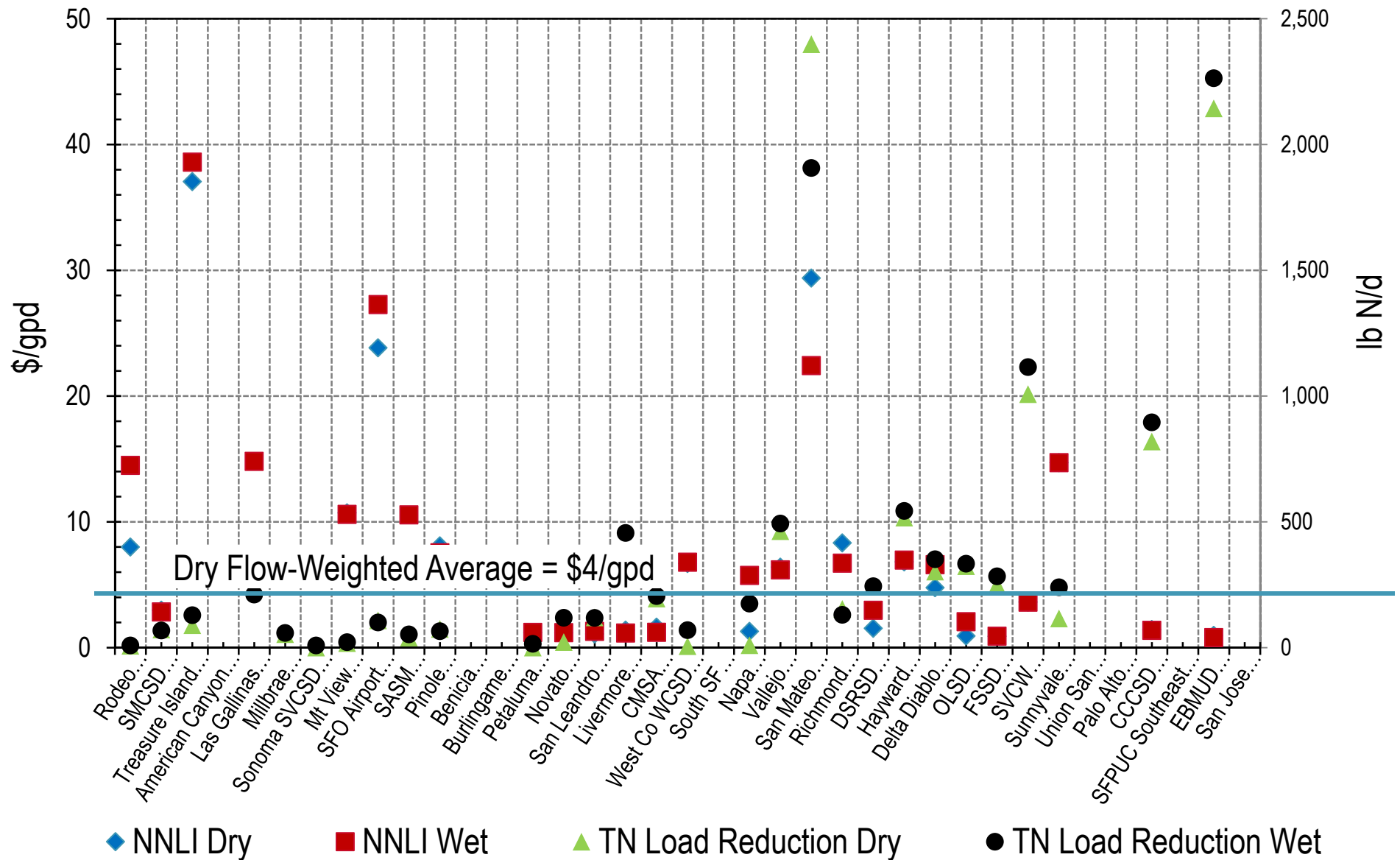
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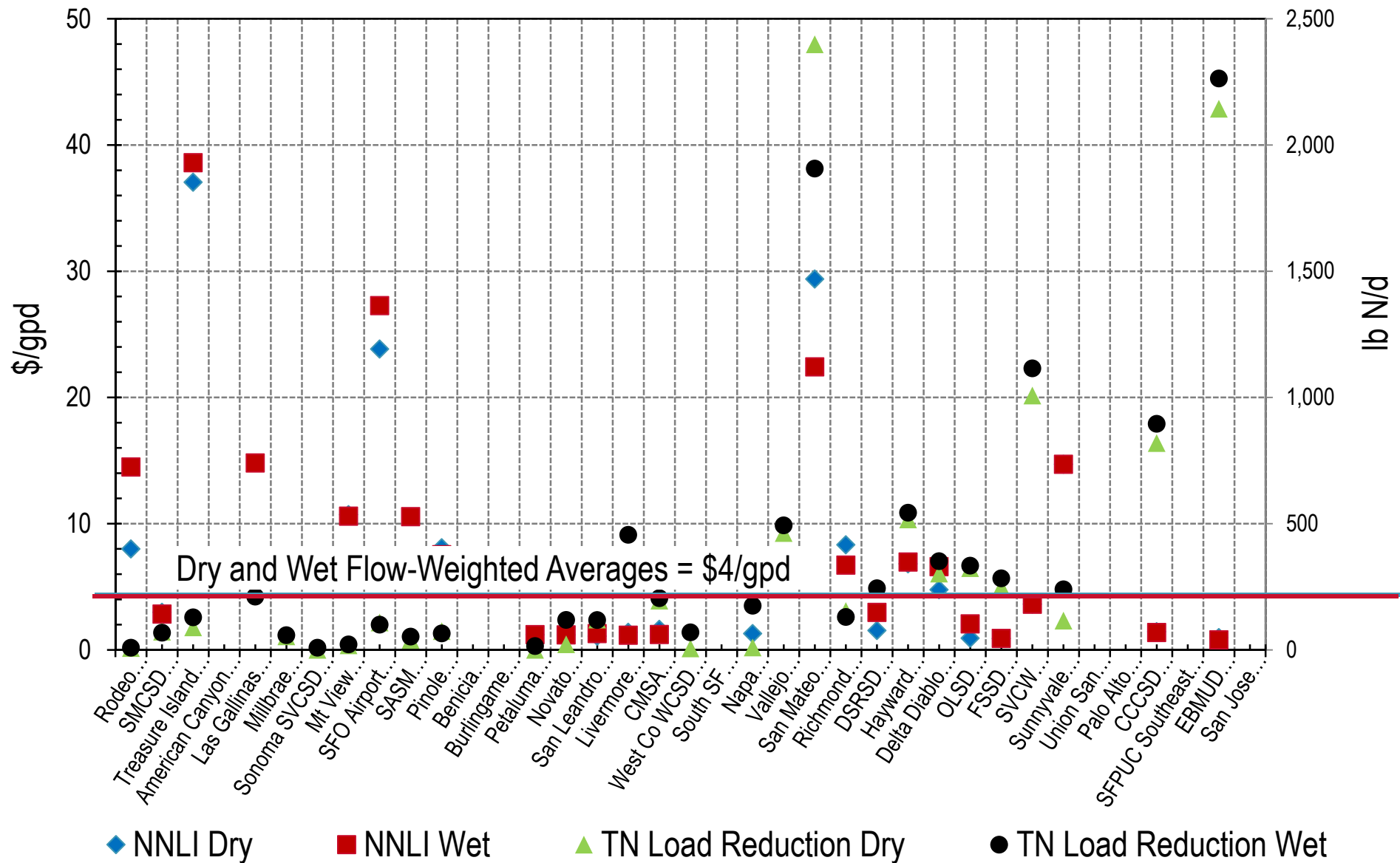
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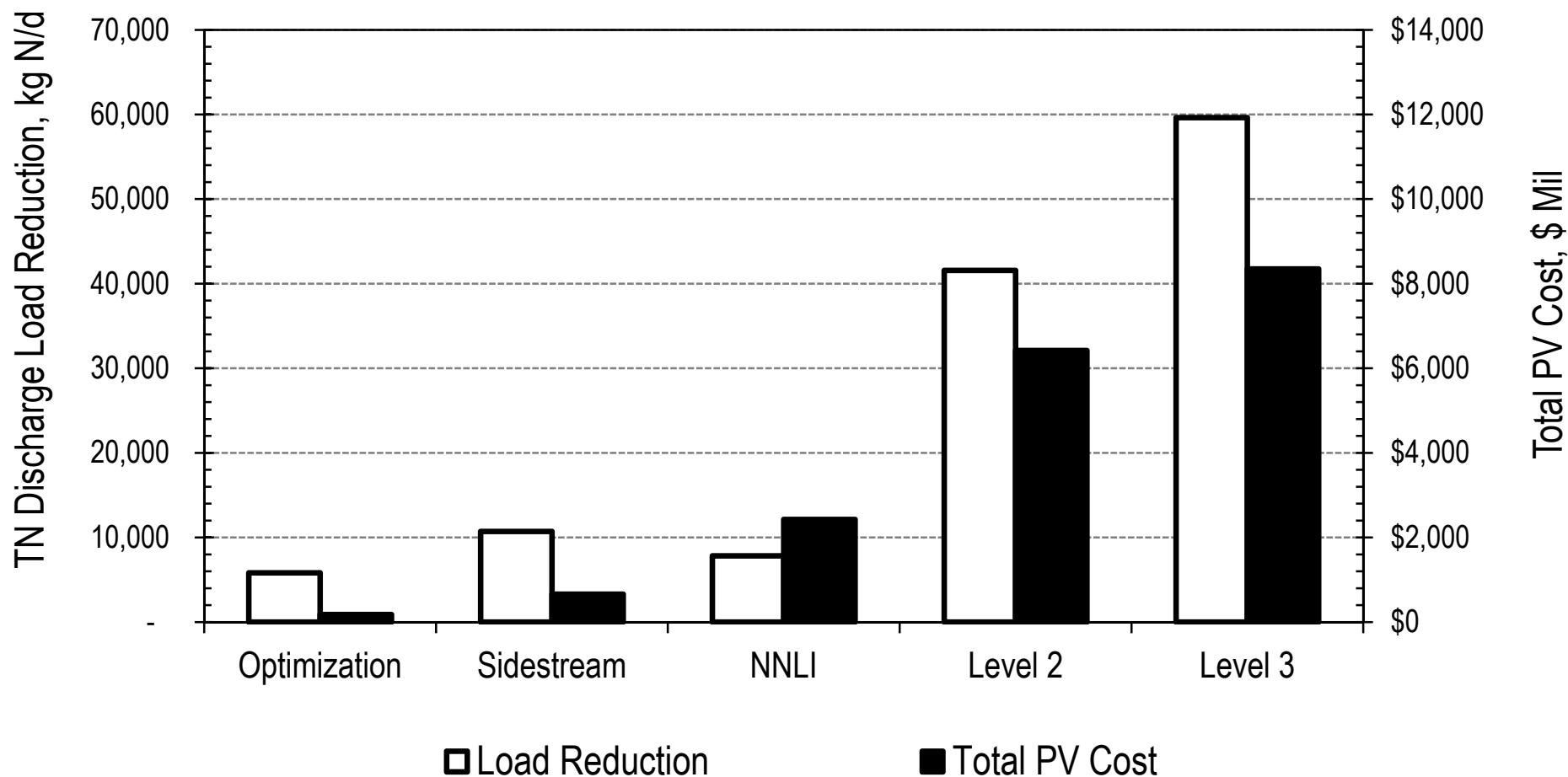
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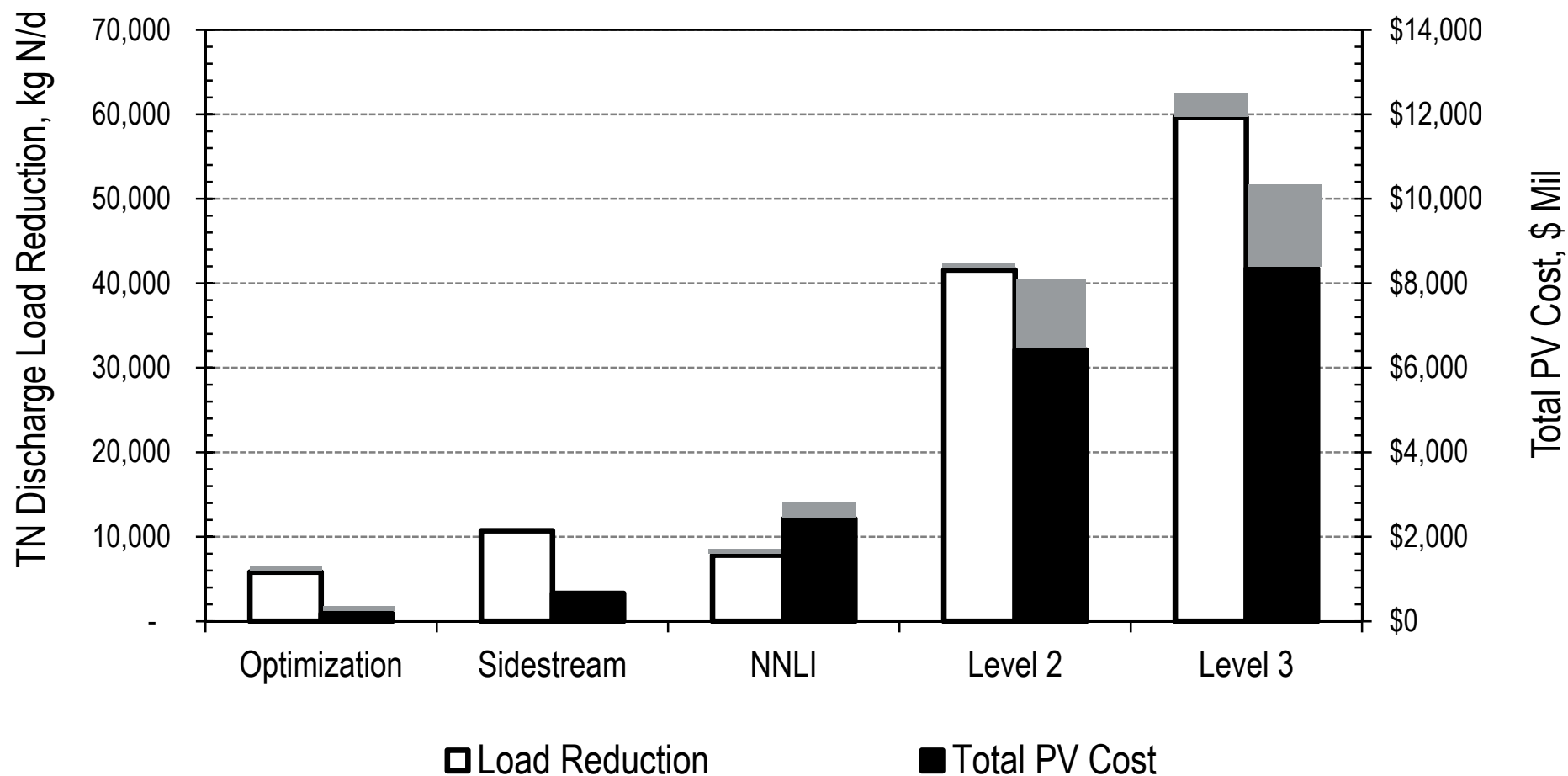
# Summary of Results

## DRAFT: Total N Discharge Load Reduction and Costs under Various Scenarios (Dry Season)



- Optimization = 10-yr planning horizon
- NNLI = 25-yr planning horizon (Projected to all 37 Plants)
- Sidestream and Upgrades (Level 2 and 3) = 30-yr planning horizon using Permitted Capacity

## DRAFT: Total N Discharge Load Reduction and Costs under Various Scenarios (Wet Season)



- Optimization = 10-yr planning horizon
- NNLI = 25-yr planning horizon (Projected to all 37 Plants)
- Sidestream and Upgrades (Level 2 and 3) = 30-yr planning horizon using Permitted Capacity



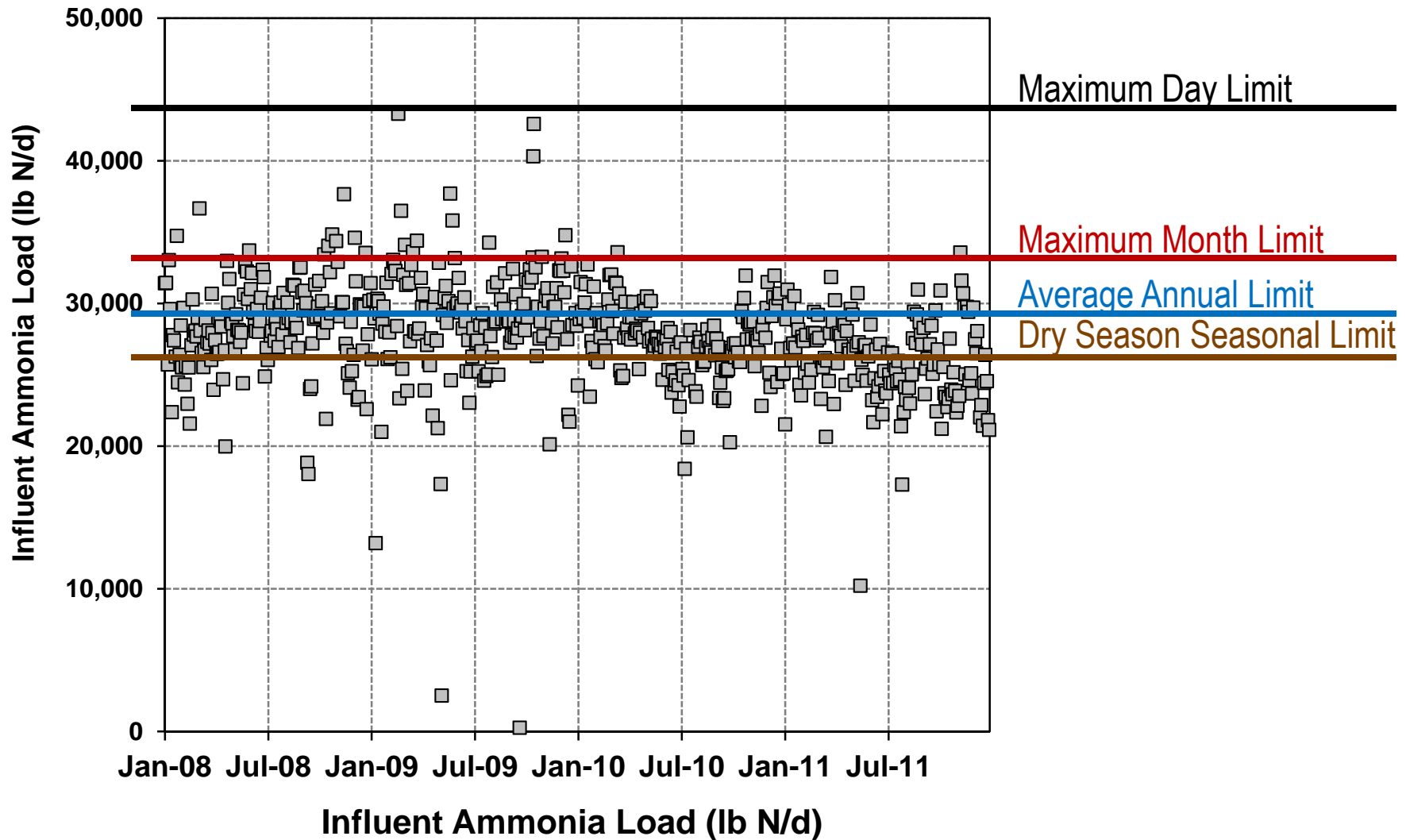
# Observations





# **Role of Averaging Periods**

# Importance of Averaging Periods



# Role of Averaging Periods on SRT and Basin Volume



***Averaging Periods Govern the SRT and Overall Basin Volume***

## Role of Averaging Periods on Cost: Oro Loma for Level 3

Parameter	Units	Dry Season			Wet Season		
		Ave Annual	Max Month	Max Day	Ave Annual	Max Month	Max Day
Capital PV	\$ Mil	60	68	84	66	73	110
O&M	\$ Mil /yr	5.7	6.0	6.3	6.1	6.6	7.1
O&M PV	\$ Mil	130	134	140	137	147	159
Total PV	\$ Mil	190	202	224	203	221	267
NH4 Load Reduction *	%	97	99	>99	92	99	>99

\* Based on 6-years historical data from Hampton Roads Sanitation District VIP Plant

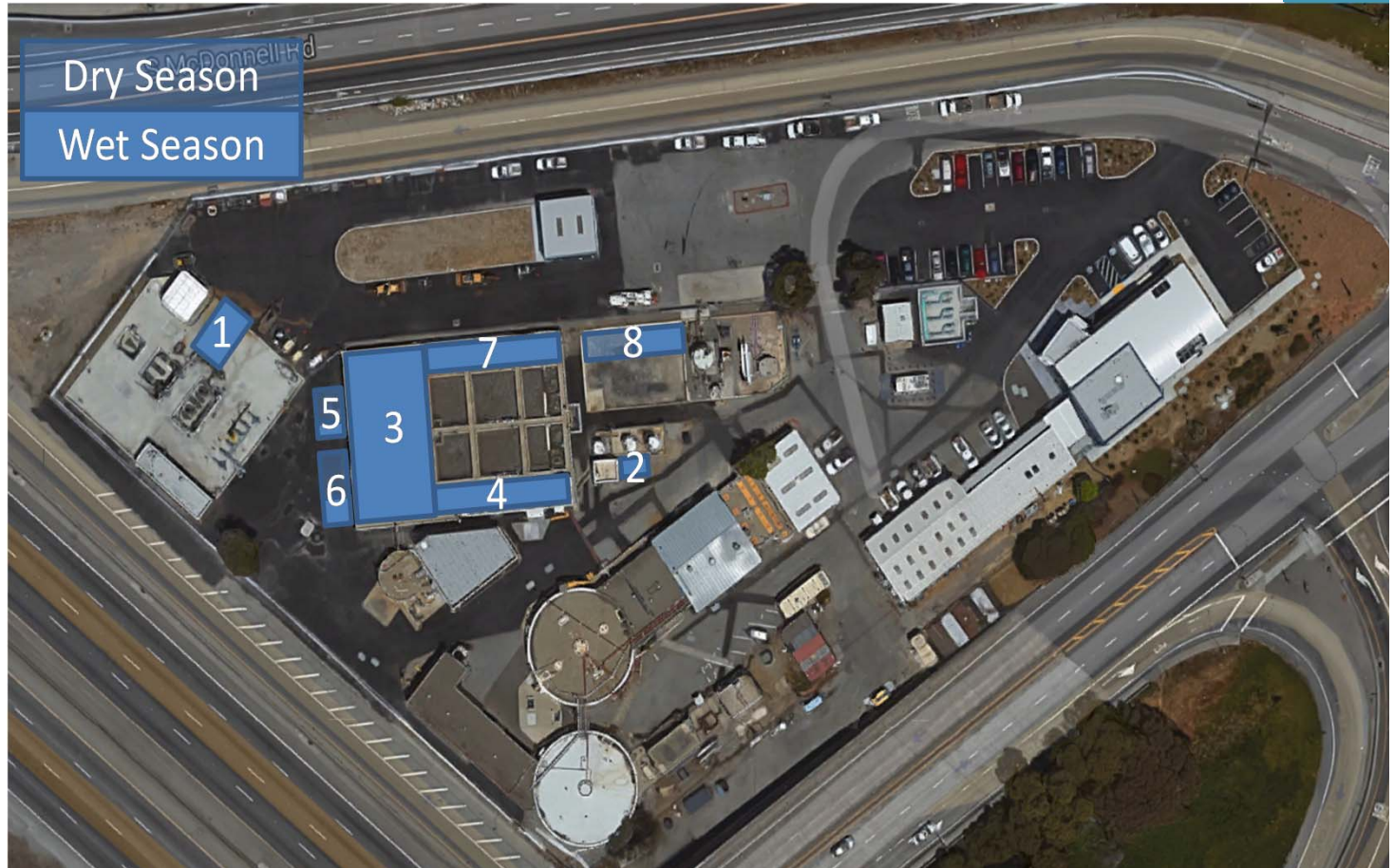


**Treating all the Flow**



# Case Study: City of Millbrae

- Permitted Capacity = 3.0 mgd ADWF
- Peak = 9.0 mgd
- Key process:
  - Must be MBR
  - Must move blower building for a train
  - Must move disinfection for a train
  - Add new disinfection
- 8 Plants were pushed to compact footprint technology due to peaks



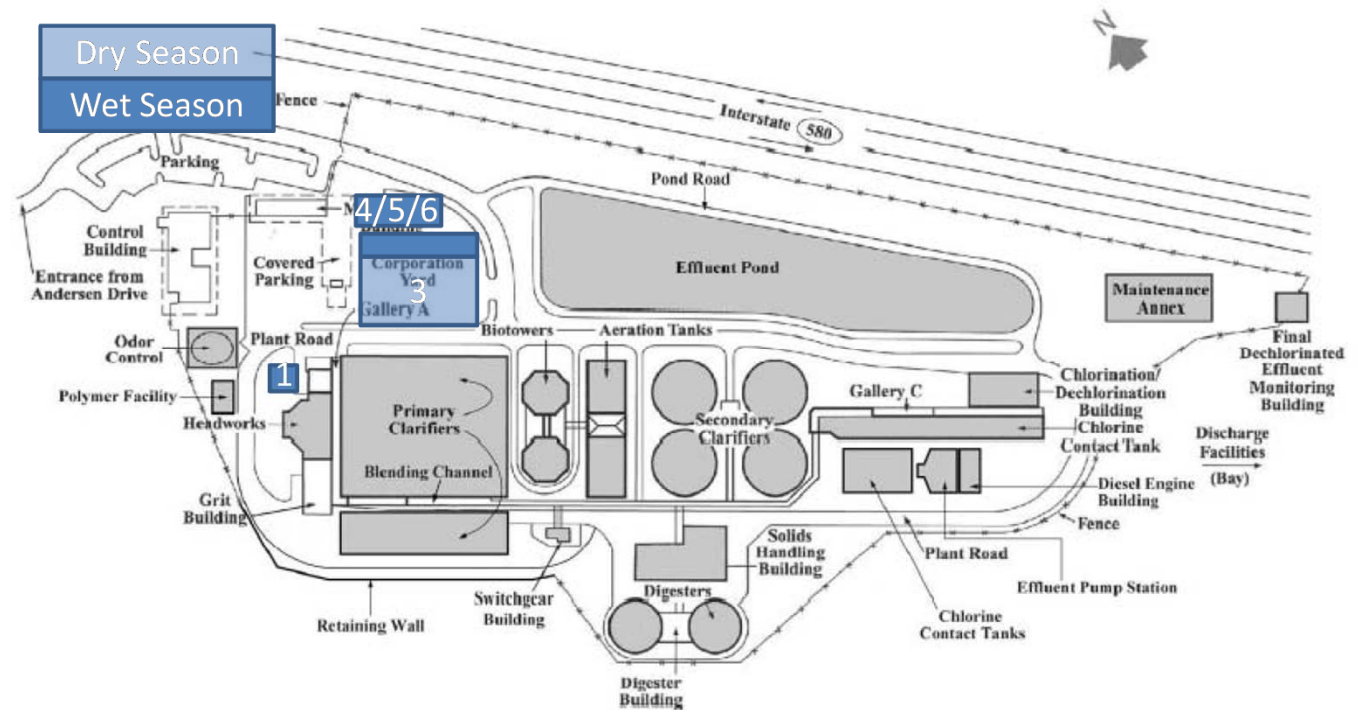
(1) Optimize ferric addition, (2) add polymer, (3) convert act sludge to MBR, (4) expand the aeration basins to create a third train, (5) add alkalinity, (6) add external carbon, (7) decommission the chlorination disinfection system (use for additional aeration basin volume), and (8) add an ultraviolet disinfection system.



# **Space Constraints**

# Case Study: CMSA

- MBR selected since it's the only option that could meet Level 3 (split treatment with existing facilities would work for Level 2)
- Plant surrounded by highway or steep hills
- 8 Plants were pushed to compact footprint technology due to space constraints

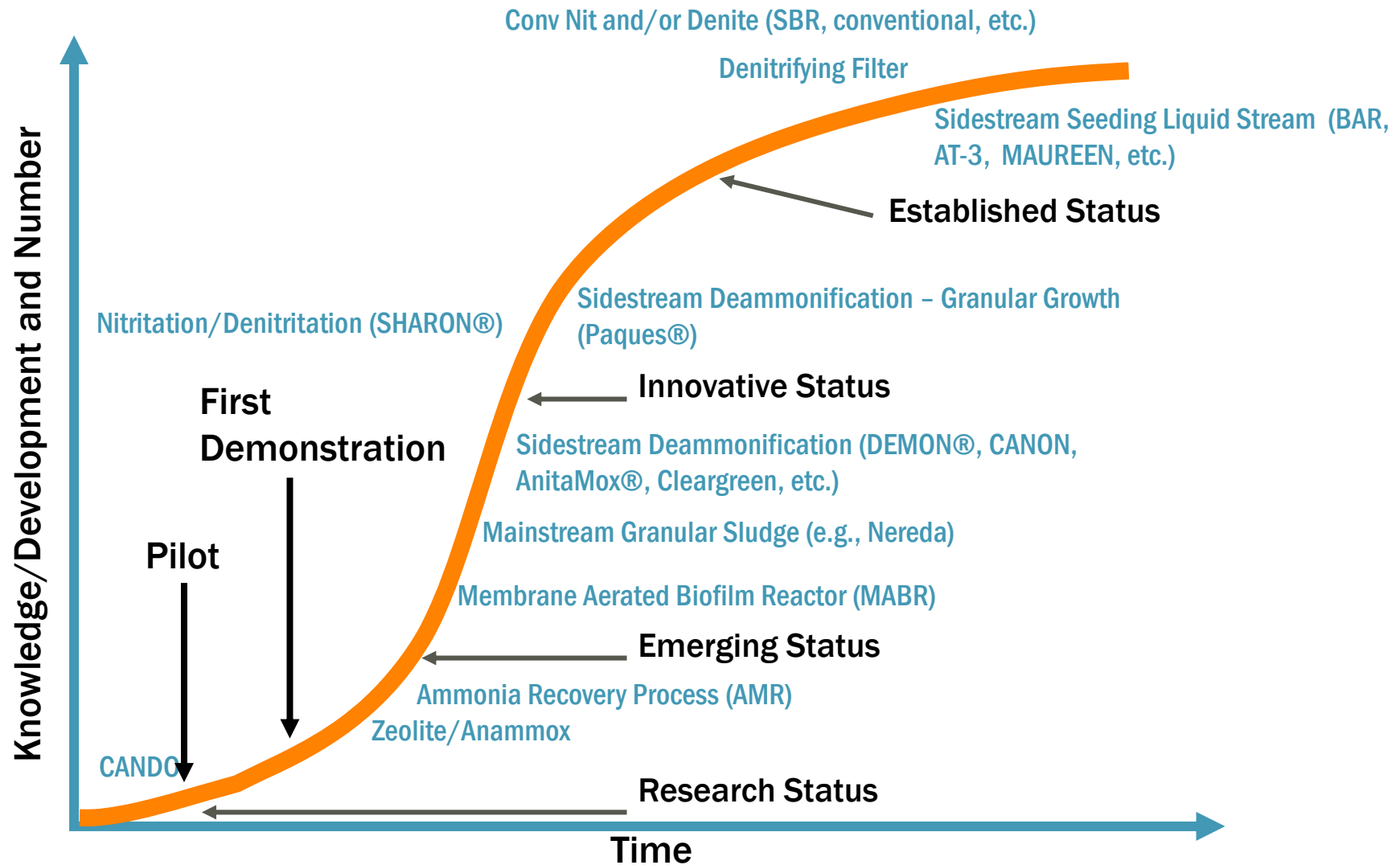


(1) Use existing ferric chloride for CEPT, (3) Add MBR facilities, (4) add an external carbon source, (5) add alkalinity, and (6) add ferric chloride



# **Role of Emerging Technologies**

# Technology Status



Adapted from Tetra Tech (2013) and Parker et al. (2011)





# Regulatory: Nitrogen versus Phosphorus



# Differences in N and P Removal

## Nitrogen Removal

- Challenging to remove with major operational changes
  - Activated Sludge (typical): with longer SRT and intensive mixed liquor returns
  - Biological Filters (to trim): requires large filter footprint plus an external carbon source
- More expensive to remove
- Requires a large footprint
- Energy and chemical intensive (at low targets)
- Can be recovered in the sidestream

## Phosphorus Removal

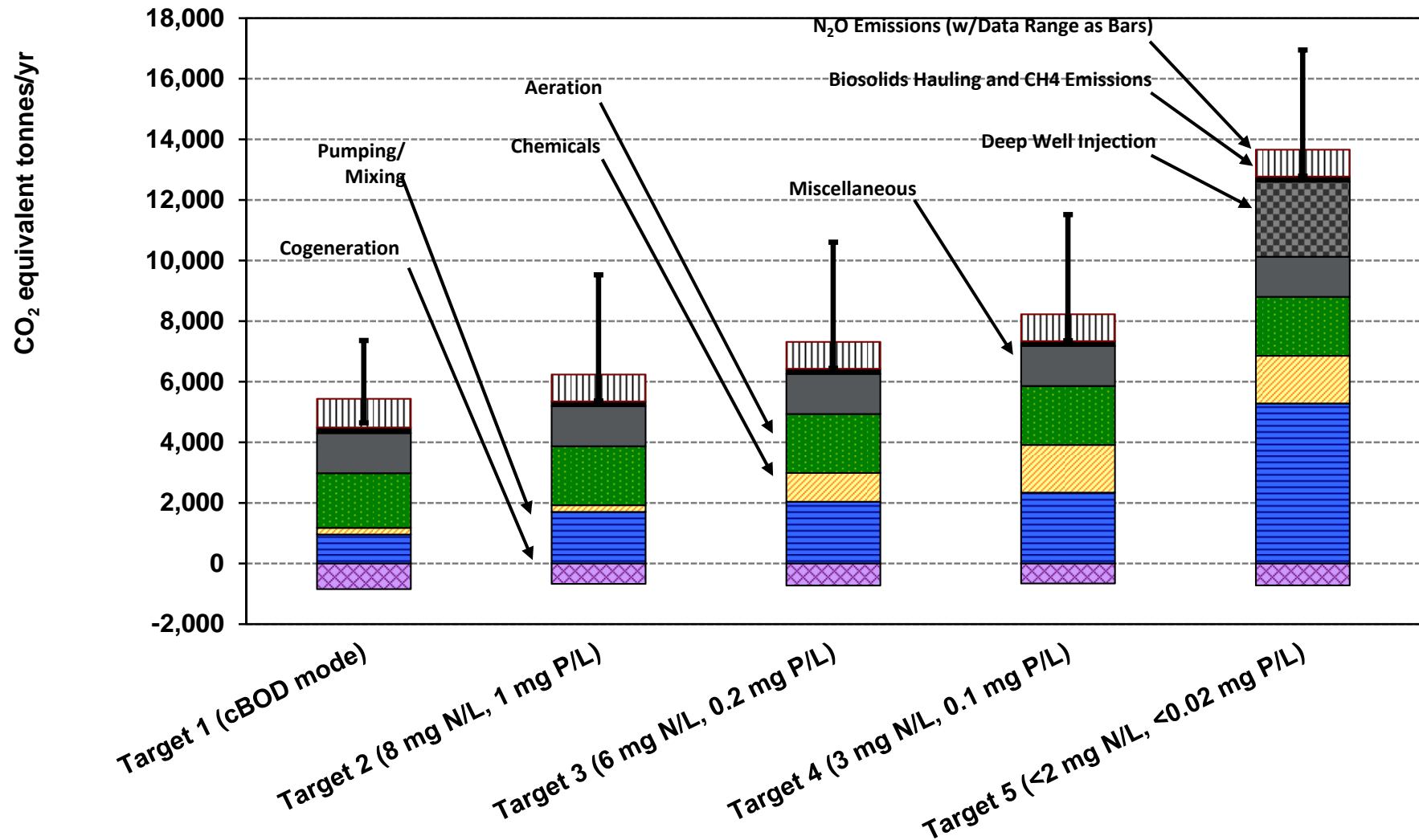
- Straightforward removal
  - Biological P (Act Sludge)
  - Chemical Precipitation: Primaries, Filters, or Sidestream
- Less expensive to remove
- Less additional footprint (extra zone or filters)
- Chemical intensive
- Can be recovered in the sidestream





# Greenhouse Gas Emissions

# Technology Status



*GHG Emissions Distribution for a Nominal 10 mgd Plant at Various Treatment Targets (Adapted from Falk et al., 2013)*



# **Recycled Water and CIP Surveys**

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
1	<b>BACWA Recycled Water Survey 2015</b>																	
2	Agency Name (Recycled Water Producer):																	
3	Recycled Water Distributors/Retailers:																	
4	<b>CURRENT AND PROJECTED FUTURE AMOUNT OF RECYCLED WATER BY USE CATEGORY (in acre-feet)</b>																	
5		Total Distribute	Confidence (see Note B)	Golf Course Irrigation (See Note C)	Landscape (see Note D)	Commercial (see Note E)	Industrial (see Note F)	Agricultural (see Note G)	Environmental Enhancement (see Note H)	Internal Use (see Note I)	GW Recharge for Indirect Potable Reuse	Surface Water Augmentation	Direct Potable Reuse	Other Non- potable Reuse (See Note J)	RO concentrate or other return	Comments		
6	Type of RW (See Note A):																	
7	Current			0	0	0	0	0	0	0	0	0	0	0	0			
8	Future																	
9	Future																	
10	Future																	
11	Future																	
12	Future																	
13	Future																	
14	<b>2015 MONTHLY RECYCLED WATER DISTRIBUTION DATA BY USE CATEGORY (in acre-feet)</b>																	
15		TOTAL		Golf Course	Landscape	Commercial	Industrial	Agricultural	Environ. Enhance	Internal Use	GW Recharge	Surface Water	Direct Potable	Other Non-	Return Flows	Comments		
16	January																	
17	February																	
18	March																	
19	April																	
20	May																	
21	June																	
22	July																	
23	August																	
24	September																	
25	October																	
26	November																	
27	December																	
28	TOTAL																	

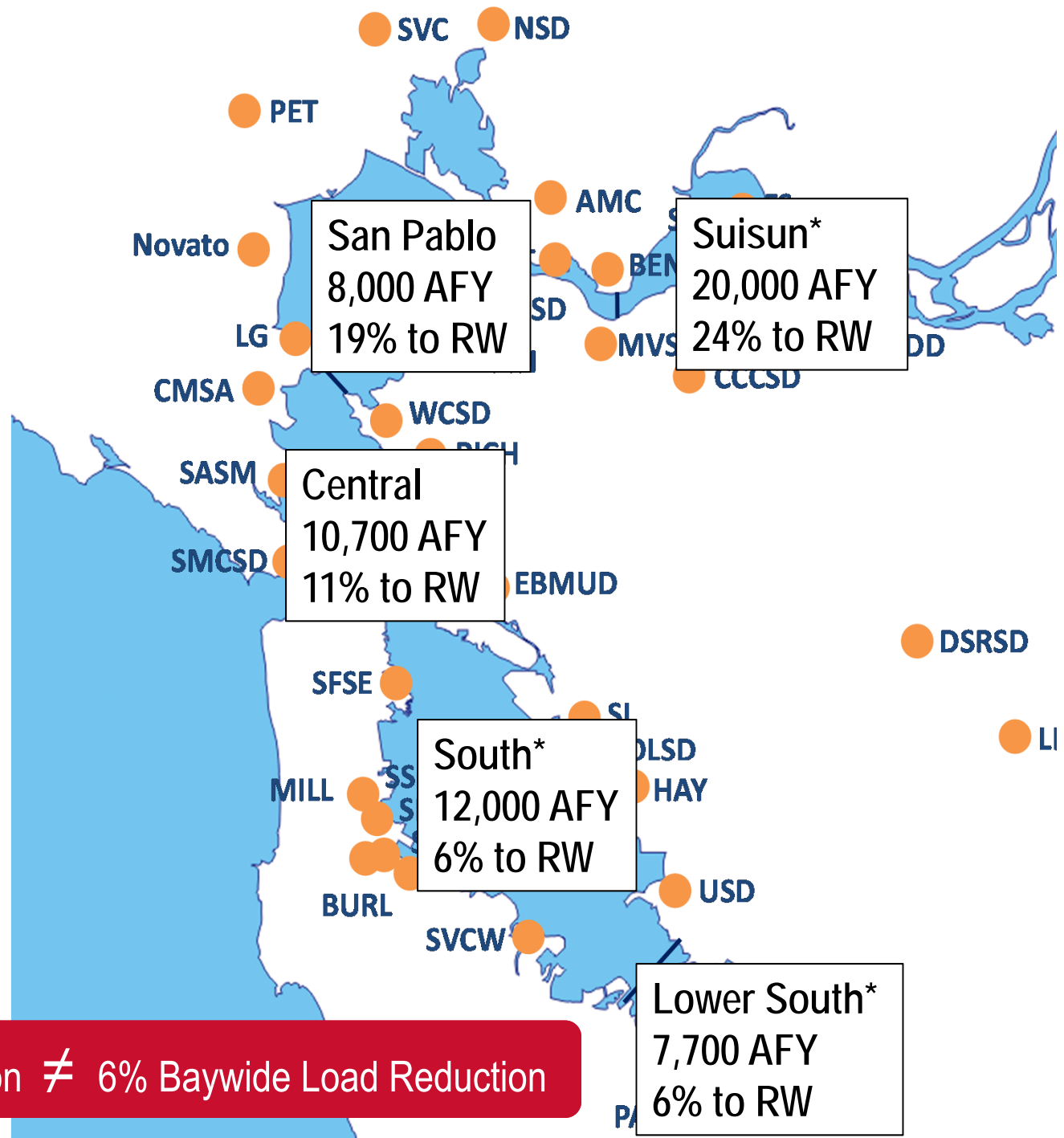
Data | README | Potable Reuse Definitions

# Recycled Water Survey



## Current Recycled Water Findings

- ~6% of Baywide plant effluent goes to recycled water
- Recycled water is expected to double by 2035
- The primary application is industrial (~40%)

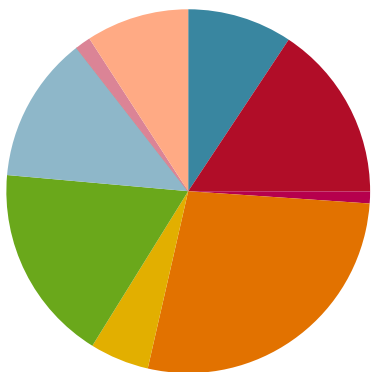


6% Baywide Flow Reduction  $\neq$  6% Baywide Load Reduction

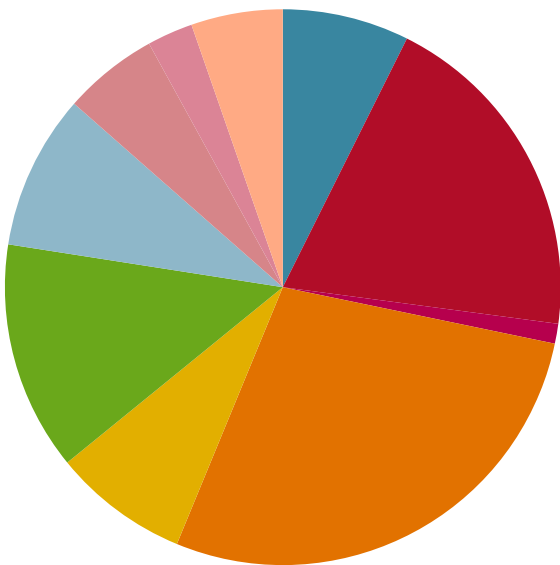


# Recycled Water Distribution over Time

Year 2015  
(58,000 AFY)



Year 2030  
(117,000 AFY)



Year 2040  
(131,000 AFY)



- |                           |                        |                |               |
|---------------------------|------------------------|----------------|---------------|
| ■ Golf Course Irrigation  | ■ Landscape            | ■ Commercial   | ■ Industrial  |
| ■ Agricultural            | ■ Environ. Enhancement | ■ Internal Use | ■ GW Recharge |
| ■ Other Non-Potable Reuse | ■ Not Defined          |                |               |

# City of Benicia: Recycled Water Project



Produce up to 2,200 AFY (~2mgd) of Title 22 Recycled Water at the City's WWTP for use as cooling tower makeup water at the Valero Benicia Refinery and irrigation water for City customers

	A	B	C	D	E	F	G	H	I	J	K
1		Name of Res	<name>								
2		Utility Name	<utility>								
3		Phone Num	<phone>								
4											
5		Planned CIP Projects that may impact nutrient loads									
6											
7											
8		Discharger	Permitted ADWDF Capacity (mgd)	Anticipated Year of Completion	Project Description	Estimated Effluent Total Nitrogen (mg N/L)	Estimated Effluent Total Phosphorus (mg P/L)	Capital Cost (\$ Mil):	Estimated Annual O&M Cost (if available: \$ Mil):	Level of Confidence	Comment
9	EXAMPLE	ABC	10	2018	1) Membrane Bioreactor (MBR); 2) Modify existing aeration basins to operate as Nit/Denite with anoxic zones and mixed liquor return pumps; 3) replace WAS pumps	6	N/A	\$200	\$100	100%	The MBR will perform reliable nitrogen removal to 6 mg N/L total nitrogen. The existing aeration basins will be modified to achieve what they can get with nitrogen removal. The anticipated average annual existing aeration basins effluent is 15 mg N/L total nitrogen.
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# CIP Survey

## Summary of CIP Survey

- 22 out of 37 plants have either on-going or planned CIP projects for nutrient load reduction
- Total Capital Cost of CIPs = \$1.5 Bil
- Example: San Mateo
  - Nutrient Removal and Wet Weather Flow Management Update and Expansion Project
  - New headworks, primary clarifiers, membrane bioreactor with nutrient removal, and disinfection
  - Estimated capital cost = \$349-369 Mil

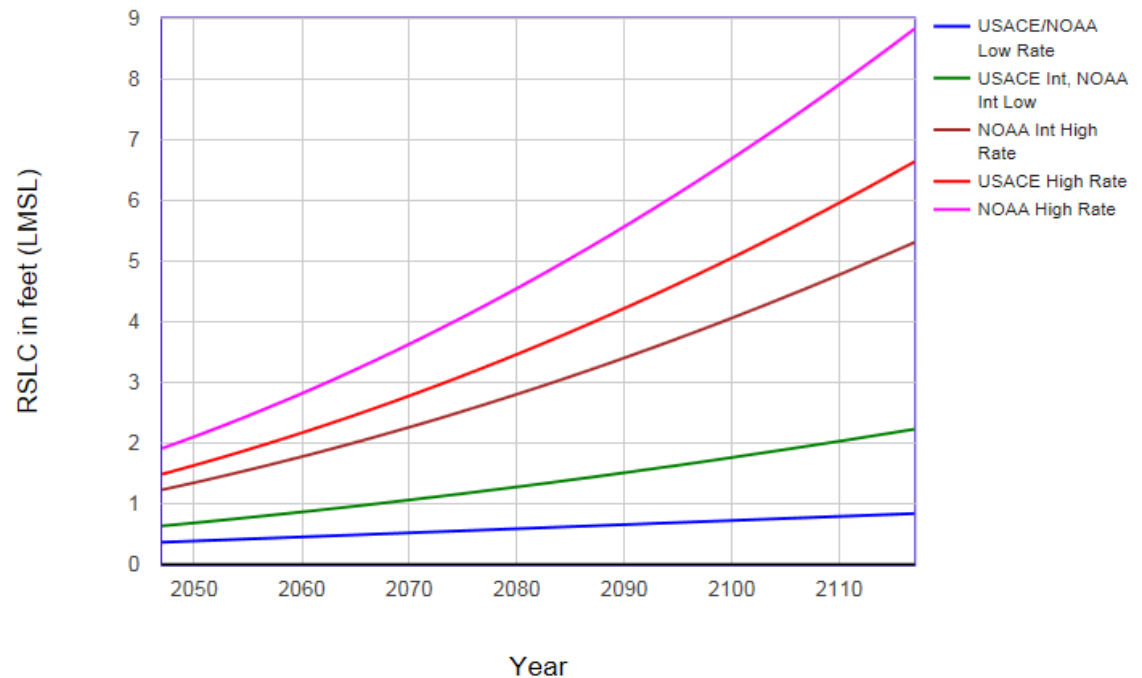




# Sea Level Rise

# Sea Level Rise Approach and DRAFT Findings

- Models used:
  - FEMA 100-yr flood hazard
  - USACE 2047 sea level rise (30-yr)
  - USACE 2067 sea level rise (50-yr)
  - USACE 2117 sea level rise (100-yr)

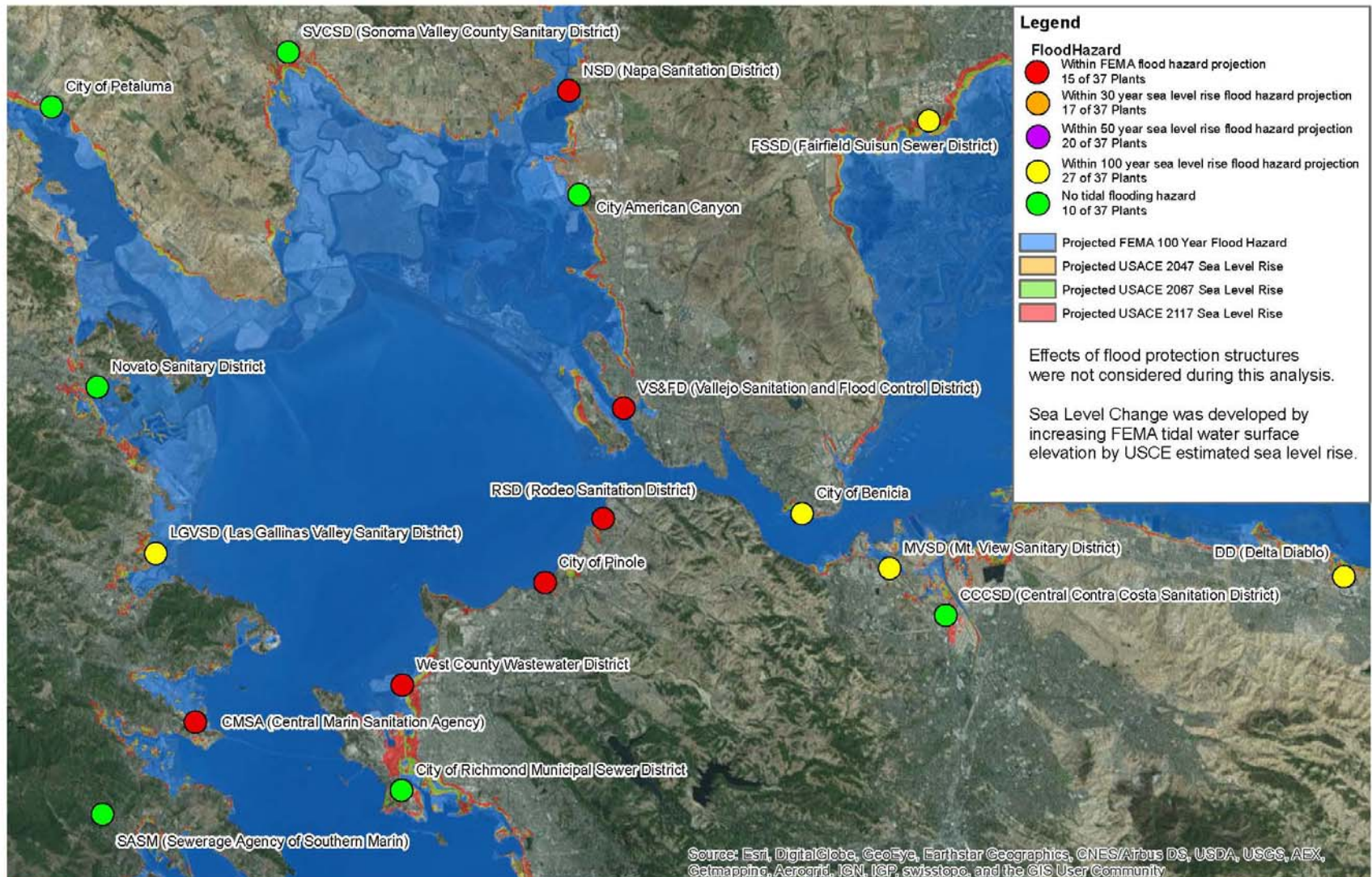


## Preliminary Number of Plants (out of 37) that are Potentially at Risk

Plants at Risk for FEMA 100-yr Storm	Plants at Risk for USACE 2047 (30-yr)	Plants at Risk for USACE 2067 (50-yr)	Plants at Risk for USACE 2117 (100-yr)	No Tidal Flooding Hazard
15	17	20	27	10



# Northern Portion



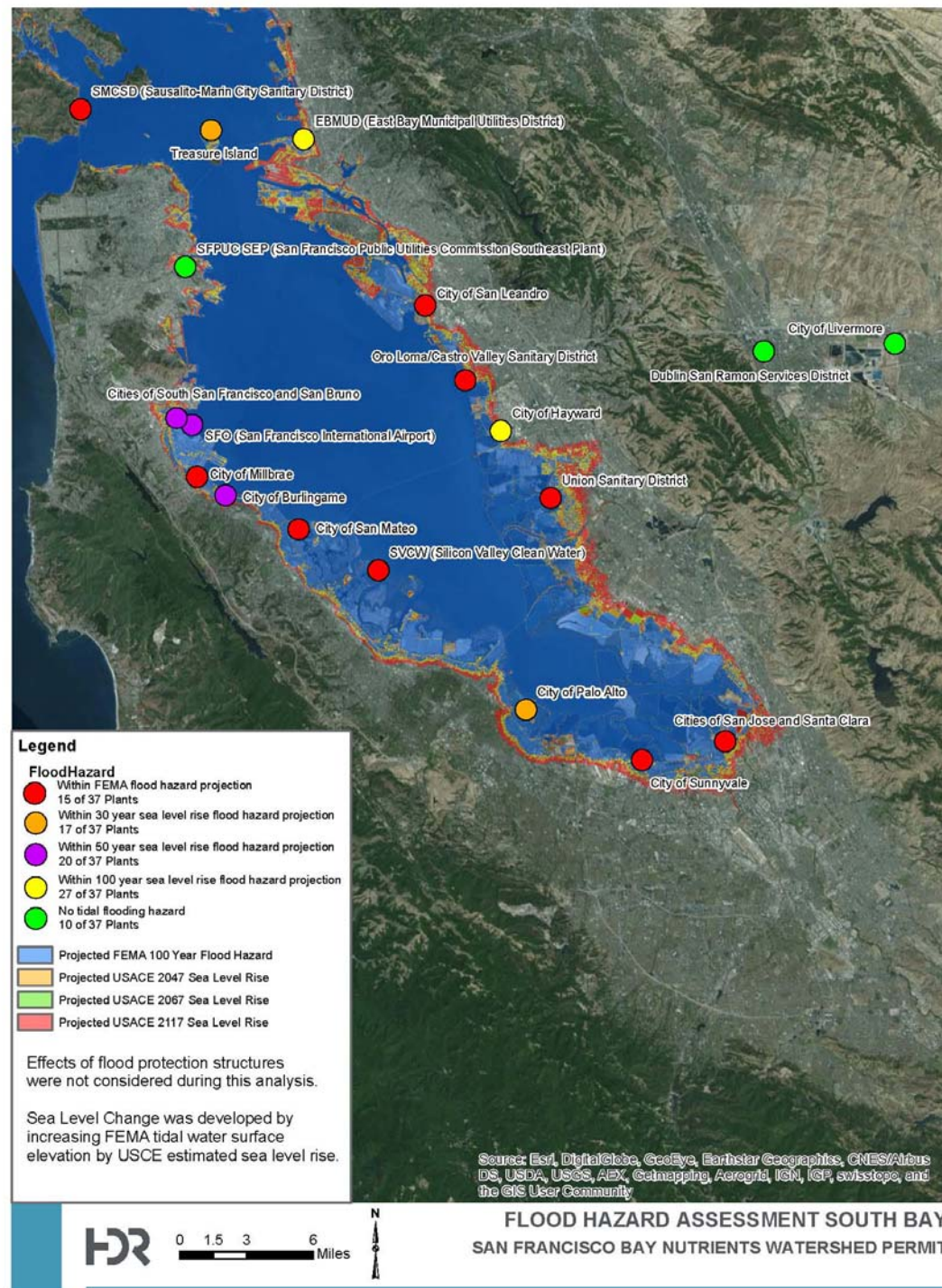
0 1.5 3 6 Miles



**FLOOD HAZARD ASSESSMENT NORTH BAY**  
**SAN FRANCISCO BAY NUTRIENTS WATERSHED PERMIT**



# Southern Portion



## Next Steps

- Draft Report Comments
- Group Annual Report
- Updated Reports
- Others





# BACWA Workshop #2: Nutrient Reduction by Treatment Optimization and Upgrades Update

7 June 2017



**Brown AND Caldwell**



**B A C W A**  
**BAY AREA**  
**CLEAN WATER**  
**AGENCIES**

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