



TITLE

Water Reclamation NPDES Permit Renewal Project

RECOMMENDATION

Adopt a Resolution authorizing the City Manager to award a contract to Larry Walker Associates, Inc. for the Water Reclamation Facility NPDES Permit Renewal in the amount not to exceed \$98,234.

CONTACT

Erica Ahmann Smithies, P.E., Public Works Director

Norman Woods, Assistant Public Works Director

Pam Phillips, Environmental Services Manager

BACKGROUND & ANALYSIS

The NPDES Permit Renewal involves renewing the Water Reclamation Facility's NPDES permit and assessing local limits. The City solicited proposals from consultants on February 10, 2026. On February 27, 2026, one proposal was received. Staff reviewed the proposal and found Larry Walker Associates, Inc. to be qualified to aid in the permit renewal process. The cost proposal reflects the reasonable and customary costs of completing the work. Below is a description of the tasks to be undertaken.

NPDES Permit Renewal

The Facility treats wastewater collected from municipal, commercial, and industrial customers citywide. The treated effluent is either recycled for use as reclaimed water or discharged into the San Francisco Bay. Facilities proposing to discharge or currently discharging into waters of the United States are required to hold a National Pollutant Discharge Elimination System (NPDES) Permit authorized by the Clean Water Act and delegated to the State of California for implementation through the State Water Resources Control Board (State Water Board) and the nine Regional Water Quality Control Boards (Regional Water Boards). The NPDES Permit specifies the conditions and obligations regarding sampling/analysis, discharge limits/conditions, special studies, and other required programs.

NPDES Permit(s) issued by Regional Water Boards are valid for a term of five years and must subsequently be renewed. The City's current NPDES Permit expires on July 31, 2027. The NPDES

Permit renewal process is technical, encompassing historical data collected from the aforementioned condition and obligations specified within the NPDES Permit. A Report of Waste Discharge (ROWD) is developed and submitted to the Regional Water Board. For the City's NPDES Permit renewal, the ROWD must be completed and submitted no later than November 3, 2026. This is followed by several technical studies such as a Reasonable Potential Analysis, Shallow Water Discharger Analysis, current Applicable Effluent Limits Calculation, and Sensitivity Analysis.

After the ROWD and Technical Analysis are submitted, the Regional Water Board will issue a first Administrative Draft of the NPDES Permit, and a subsequent Tentative Order. The final NPDES Permit does not have a target adoption date at this time, however, staff anticipates the new NPDES Permit to be approved by the Regional Water Board in mid summer 2027.

Local Limits Assessment

In conjunction with the NPDES Permit renewal, the City will be undertaking a Local limit Assessment (LLA).

Local Limits are discharge limits applied to private dischargers that discharge into the sewer system. Local Limits reflect the specific capabilities of the Water Reclamation Facility and serve to protect against potential NPDES Permit violations and the environment. The potential pollutants of concern and various other constituents get evaluated at the maximum concentration of a pollutant and/or constituent able to enter and be treated at the Water Reclamation Facility. Combined, these assessments are completed in the time frame between the submittal of the NPDES Permit renewal in November 2026 and the adoption of the new NPDES Permit in mid summer 2027. The Local Limits Assessment is submitted to the Regional Water Board immediately following the adoption of the new NPDES Permit. If it is determined that a change in Local Limits is appropriate, Regional Water Board approval and Municipal Code updates will be required.

The level of knowledge and technical expertise required to successfully renew the Permit and modify the Local Limits is above and beyond that of existing staff. Therefore, staff recommends the Council award a consulting contract to Larry Walker Associates, Inc.

COUNCIL PRIORITY PROGRAMS AND PROJECTS

Environmental Sustainability: "Demonstrate leadership in environmental sustainability."

FISCAL IMPACT

The NPDES Permit Renewal has been included in the Fiscal Year 2025/26 and 2026/27 Operations Budget. The total cost is \$98,234 which will be allocated from Fund 540 Wastewater Operations.

ENVIRONMENTAL REVIEW

None

COMMUNICATION

Level 0: No Further Public Communication Needed

ATTACHMENTS:

1. [Resolution NPDES Permit Renewal.pdf](#)
2. [Larry Walker Associates, Inc. Proposal](#)
3. [Larry Walker Associates, Inc. Estimate](#)