

Central Valley Regional Water Quality Control Board

22 May 2025

Maya McInerney
San Francisco Public Utilities Commission
525 Golden Gate Avenue
San Francisco, CA 94102

CERTIFIED MAIL
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NOTICE OF APPLICABILITY; CENTRAL VALLEY WATER BOARD RESOLUTION R5-2023-0061; WAIVER OF WASTE DISCHARGE REQUIREMENTS, REPORTS OF WASTE DISCHARGE, AND/OR WATER RECYCLING REQUIREMENTS FOR SPECIFIC TYPES OF DISCHARGE WITHIN THE CENTRAL VALLEY REGION; SAN FRANCISCO PUBLIC UTILITIES COMMISSION; O'SHAUGHNESSY DAM DRAINAGE IMPROVEMENT PROJECT; TUOLUMNE COUNTY

On 20 March 2025, the San Francisco Public Utilities Commission (Discharger or SFPUC) submitted a Report of Waste Discharge (RWD) for coverage under Resolution R5-2023-0061, *Waiver of Waste Discharge Requirements, Reports of Waste Discharge, and/or Water Recycling Requirements for Specific Types of Discharge Within the Central Valley Region* (Low Threat Waiver), for the O'Shaughnessy Dam Drainage Improvement Project (Project). The Project consists of discharging flush water generated from drain maintenance activities at the dam to a dirt road controlled by the Discharger for dust control.

Based on the information provided in the RWD, the proposed application of the process wastewater for use as dust control and/or reuse meets the conditions for enrollment under the Low Threat Waiver. You are hereby assigned enrollee number **R5-2023-0061-0035**. Please include this number in all correspondence related to this discharge. A copy of the [Low Threat Waiver](#) is enclosed, and is available on the Central Valley Water Board's website at the following web address:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2023-0061.pdf

Please familiarize yourself with the contents of the Low Threat Waiver, including the Conditions of Discharge (Low Threat Waiver, Attachment A). The discharge must be managed in accordance with the requirements listed in the Conditions of Discharge (Table 1, Category 13 – Discharge to land from backwashing and/or flushing of water treatment systems), the information submitted in the RWD, and this NOA. Note that the Low Threat Waiver will expire on **14 December 2028**. Prior to this date, the Discharger shall contact the Central Valley Water Board and either cease the discharge or submit a new RWD and application fee to continue under a renewed waiver, or individual waste discharge requirements.

NICHOLAS AVDIS, CHAIR | PATRICK PULUPA, EXECUTIVE OFFICER

PROJECT LOCATION AND DESCRIPTION

The O'Shaughnessy Dam (Dam) was constructed to impound the Tuolumne River and form the Hetch Hetchy Reservoir, which provides a drinking water source for the City of San Francisco residents. The Dam is at Evergreen Parkway where it meets the Hetch Hetchy Reservoir in Yosemite National Park, Tuolumne County (see Attachment A below). The Dam facility contains 5 and 6-inch drains, and triangular cross section drains that have become fully or partially clogged with sediment and calcium carbonate deposits. The Discharger proposes to perform maintenance at the Dam to clean out these drains using surface water from the Hetch Hetchy Reservoir.

The Project will use high pressure water jets or mechanical drain cleaning methods (neither use chemicals) to clear the drains. The Project is anticipated to last 45 days and will generate about 1,000 gallons of drain cleanout wastewater per day. Wastewater produced during the drain cleanout will be routed to Baker Tanks to allow sediments and particles to settle out prior to being either reused in the drain cleaning efforts or used for dust control along Evergreen Parkway, which is a dirt access road to the Dam. The Discharger controls a 150-foot right-of-way from the center line of the road (75 feet to either side). Collected sediment and particles will be disposed of offsite at an authorized disposal facility. Wastewater in the Baker Tanks will be tested for pH and turbidity prior use/discharge.

Following initial cleanout activities, wastewater may be reused to supplement source water for the Project after deposits settle out in the Baker Tank, and pH and turbidity testing has been conducted. Ultimately, the collected wastewater will be discharged along about one half-mile (0.5 miles) of Evergreen Parkway for dust control as shown on Attachment B, Site Plan.

For dust control, wastewater will either be pumped to a water truck and then discharged along Evergreen Parkway, or a pump/hose system will be installed such that water may be pumped from the settling tank to a perforated hose along the road. The distance from the Tuolumne River to the discharge area varies from about 200 to 850 feet. Inspections will be conducted to ensure that the discharge remains within the right of way, does not come into contact with surface waters, or create erosion concerns. Fiber rolls/waddles may be placed on the downstream edge of the road to prevent erosion in certain areas. Where drainages cross the road, wastewater will not be discharged within 100-feet of the upslope side of the road and within 50-feet of the downslope side.

A sample of the source water to be used to flush the drains was collected for water quality analyses on 4 November 2024 and the results for select constituents are summarized in Table 1.

Table 1 – Source Water Quality

Constituent	Units (see 1 below)	Result
Dissolved Oxygen	mg/L	8.2
pH	pH s.u.	6.86
Specific Conductance	µmhos/cm	9.2
Temperature	°C/°F	16/61
Total Dissolved Solids	mg/L	7
Turbidity	NTU	0.27

PROJECT-SPECIFIC REQUIREMENTS

The Low Threat Waiver and this NOA cover the discharge of wastewater generated from the Project as specified above. The Discharger shall comply with the requirements specified in the Low Threat Waiver, and the following facility specific requirements:

1. Discharge of drain flushing wastewater at a location or in a manner different from that described in the RWD and this NOA is prohibited.
2. The application shall not cause or threaten to cause conditions of contamination, nuisance, or pollution as defined in California Water Code section 13050.
3. Discharge or runoff of drain flushing wastewater from storage and/or application areas to adjacent lands, surface waters, or surface water drainage courses is prohibited.
4. The area around the Baker Tank, and/or the perforated hose shall be visually inspected on a daily basis, when in use, for evidence of leaks and/or cracks.
5. All settled solids will be disposed of offsite at an approved disposal site.

Failure to comply with the requirements of the Low Threat Waiver R5-2023-0061, and this NOA could result in enforcement actions, as authorized by provisions of the California Water Code, which could include civil liability.

Document Submittals

The Central Valley Water Board is implementing a Paperless Office System to reduce paper use, increase efficiency, and provide a more effective way for our staff, the public, and interested parties to view documents in electronic form. All monitoring and technical reports required by the Provisions of the Low Threat Waiver and its Monitoring and Reporting Program must be submitted by email to our Electronic Content Management (ECM) system at: centralvalleyfresno@waterboards.ca.gov. Documents that are 50MB or larger should be transferred to a disk/flash drive and mailed to the appropriate Regional Water Board office, in this case 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information should be included in the body of the email or any documentation submitted to the mailing address for this office:

Program: Non-15
Discharger: San Francisco Public Utilities Commission
Facility Name: O'Shaughnessy Dam Drainage Improvement Project
Place ID: 900678
Order: R5-2023-0061-0035

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to:

Central Valley Regional Water Quality Control Board - Fresno Office
1685 E Street
Fresno, CA 93706

All documents, including responses to inspections and written notifications, submitted to comply with this Waiver shall be directed, via the paperless office system, to the Compliance and Enforcement Unit, attention to Omar Mostafa. Mr. Mostafa can be reached at (559) 445-5197 or Omar.Mostafa@waterboards.ca.gov. Questions regarding the permitting aspects of the Waiver, and notification for termination of coverage under the Waiver, shall be directed, via the paperless office system, to the WDR Permitting Unit, attention Jeff Pyle. Mr. Pyle can be reached at (559) 445-5145 or by email at Jeffrey.Pyle@waterboards.ca.gov.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Resources Control Board by 5:00 p.m. on the next business day.

Copies of the law and regulations applicable to filing petitions may be found on the internet at Copies of the laws and regulations applicable to filing petitions (https://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

Digitally signed by Alex S. Mushegan on 22 May 2025
For Patrick Pulupa
Executive Officer

(see next page for attachments, enclosure, and cc's)

Attachments: Attachment A – Site Location Map
 Attachment B – Site Map

Enclosure:

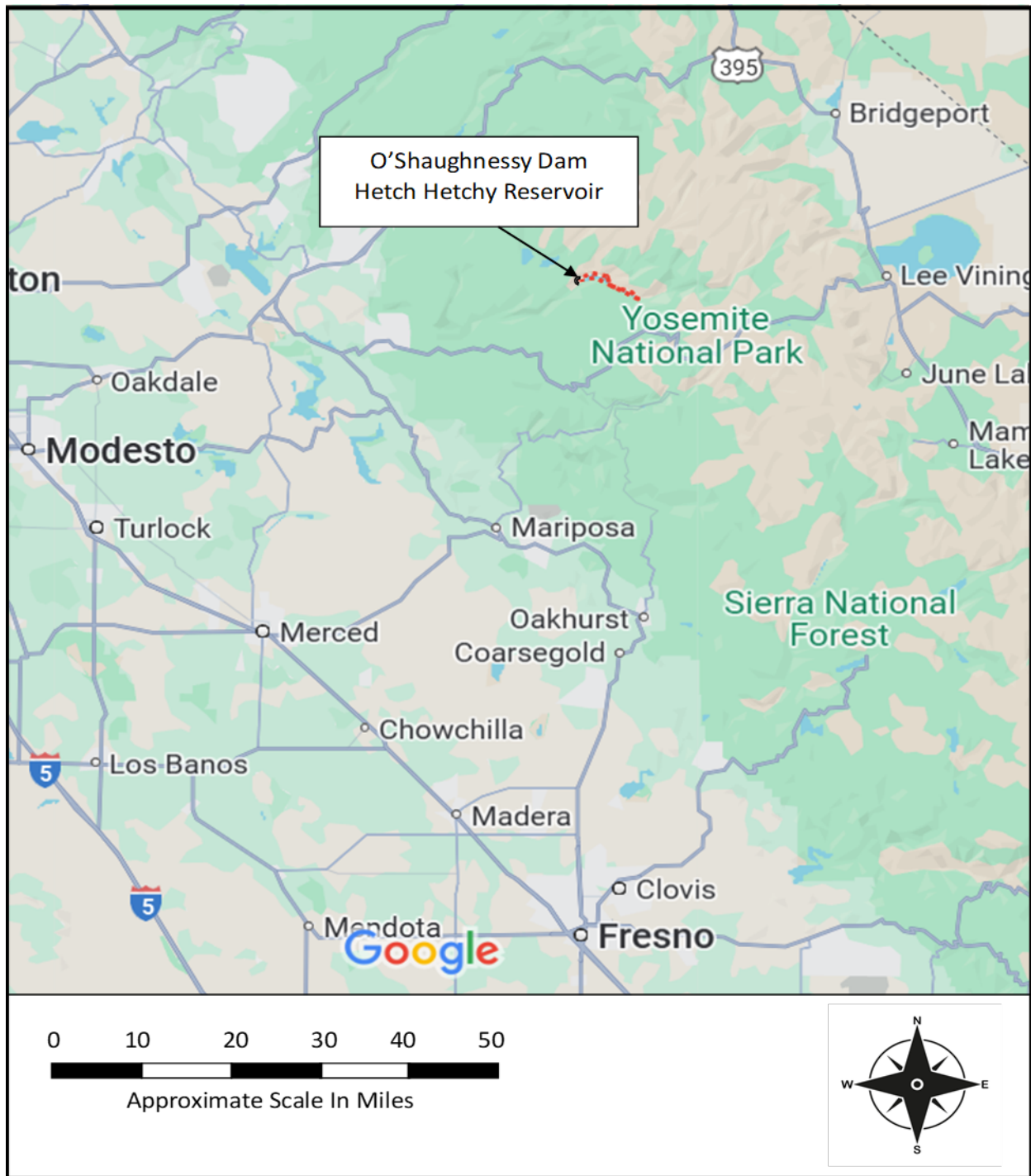
- Resolution Low Threat Waiver R5-2023-0061 (Discharger Only)

cc's:

- Chris Moskal, State Water Resources Control Board, OCC (via email)
- Ofelia Romero Maraccini, State Water Resources Control Board, DDW (via email)
- DWQ-WDR@waterboards.ca.gov
- RB5S-cvsalts@waterboards.ca.gov
- Omar Mostafa, Central Valley Water Board, Fresno (via email)
- Debbie Larson, Director of Environmental Health, Tuolumne County (via email)
- Maya McInerney, SFPUC (via email)

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Attachment A – Site Location Map



Attachment B – Site Plan



Originally prepared by SFPUC and included as Figure 1 in SFPUC's 20 March 2025 RWD. No scale provided.