

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

MEETING DATE: June 11, 2025

ITEM: 4

Executive Officer's Report

Executive Officer’s Report June 6, 2025

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Non-Stormwater Discharges Eliminated at Oyster Point Landfill, South San Francisco (Aidan Cecchetti and Vic Pal)

In October 2023, while collecting water samples from the Bay adjacent to the former Oyster Point Landfill in South San Francisco, Planning Division staff discovered turbid, discolored discharges with floating white particulates flowing out of several storm drain outfalls (Figure 1). Concerned that the discharges might represent a threat to public health or the environment, they contacted the City of South San Francisco (City) about their findings. These observations were the Water Board's first glimpse into a sticky problem that would require nearly three years of investigations, regulatory oversight, and retrofits to stormwater infrastructure to resolve.

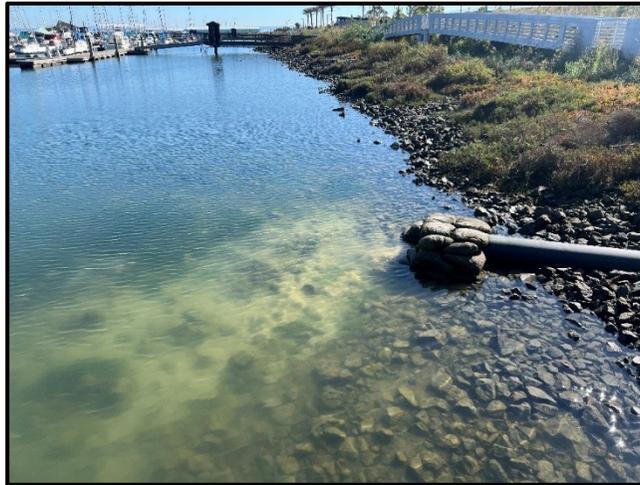


Figure 1: Discolored discharge from one of the affected outfalls in October 2023.

Oyster Point Landfill is a closed Class III landfill that primarily accepted construction and debris material until 1970, after which the landfill was formally closed. Since closure, the City has regularly monitored groundwater, leachate, and landfill gas. In the course of that monitoring, an environmental consultant working with the City identified the same “milky tan” discharges described above flowing out of the site’s municipal separate storm sewer system (storm sewer) outfalls. The City quickly determined that the discharges were not leaching from waste in the landfill because samples did not contain detectable levels of constituents of concern typically found in landfill leachate. The City also determined that, despite coming from the storm sewer, the discharges were not stormwater because they did not coincide with rainfall. Moreover, the discharges had a pH above 9 – exceeding the San Francisco Bay Basin Water Quality Control Plan water quality objective for pH. Contaminated non-stormwater discharges are prohibited under the Water Board’s Municipal Regional Stormwater NPDES Permit (MRP).

In the five years before the discharges were first observed, redevelopment began at the former landfill site, which now includes office space, shoreline protection measures, walking trails, native plant restoration work, and a new storm sewer. Before these improvements, the landfill would often flood, especially during king tides, leading to a 2015 Water Board directive to address long-term flood protection at the landfill. In response, permeable lightweight cellular concrete fill was placed onsite to increase landfill perimeter elevations as a shoreline protection measure. Staff in the Watershed

Management and Groundwater Protection divisions, along with the City's environmental consultant, eventually concluded the discharges were coming from pore water within the lightweight cellular concrete, which was leaking into the City's storm sewer through poorly sealed junction boxes, pipes, and vaults. The pore water contained suspended solids and metals and had a high pH, possibly due to insufficient curing time of lightweight cellular concrete during construction and a lack of atmospheric pH buffering because the lightweight cellular concrete was buried under cover material.

After identifying lightweight cellular concrete as the source of the discharges, the City sealed gaps in the storm sewer, which significantly reduced the volume of the discharges, but did not eliminate them. Staff informed the City that it must take additional actions to cease the discharges. In response, the City designed and installed a sump and diversion pump system (Figure 2) to collect the discharges within the storm sewer and divert them to the sanitary sewer to be treated at the City's wastewater treatment plant. Concurrently with this effort, the City installed inflatable bladders in the storm sewer outfalls to stop any remaining discharges (Figure 3). In a memo dated February 28, 2025, the City's consultant confirmed completion of these corrective actions. Water Board staff have conducted follow-up inspections and confirmed the discharges have ceased. Staff also identified vigorous vegetation growth (e.g., algae and native plants) around the outfalls, further indicating that the non-stormwater discharges have been addressed.



Figure 2: Exterior of the newly installed concrete sump basin (left) and interior showing the pump installed to divert lightweight cellular concrete related discharges to the sanitary sewer (April 2025).



Figure 3: Inflatable bladder inside one of the outfalls (April 2025).

Cross-divisional collaboration in response to this incident was critical to the eventual resolution of the prohibited discharges. Vic Pal, from the Groundwater Protection Division, provided knowledge about the landfill's historical operations, geological setting, and recent development that was crucial for identifying lightweight cellular concrete as the discharge source and developing appropriate remedial actions. Selina Louie, from the Planning Division, recognized the discharges as potential violations of the Basin Plan and the MRP, bringing them to the attention of Watershed Management Division staff. Staff in the Watershed Management Division, including Joseph Martinez and Aidan Cecchetti, provided knowledge about stormwater management, as well as regulatory oversight, communicating to the City its obligation to stop the discharges due to the MRP's prohibitions on non-stormwater discharges. During joint inspections, Watershed Management and Groundwater Protection division staff used their combined expertise and background knowledge, and rapport built with City staff and their consultants, to develop and implement a solution to address these non-stormwater discharges.

This incident also illustrates a concern about future uses of lightweight cellular concrete. Because this material is lightweight, strong, and relatively inexpensive, it is increasingly being used as an engineered solution to raise elevations in response to sea level rise. However, there exists the potential for lightweight cellular concrete pore water with high pH, turbidity, and elevated metals concentrations to leach into groundwater and surface water. This appears to be especially true when the lightweight cellular concrete is not given sufficient time to cure or is buried with cover material that limits adequate exchange with the atmosphere.

Site Cleanup Program Performance (Katie Kulha)

Our Region dedicates about 20 positions to the Site Cleanup Program (SCP) which includes about 620 cases. We prioritize cases to ensure timely investigation and cleanup based on the risk and threat posed by toxic/nuisance pollution. The magnitude (i.e., concentration) and proximity to people, water, and habitat are the main indicators of risk and threat. Additional prioritization indicators include racial equity and environmental justice, which were discussed in the June 2023, Site Cleanup Program Performance item. Case priority can change over the lifecycle of the case as investigation findings confirm the likelihood of existing exposure or discharge, or if cleanup and mitigation actions successfully abate the risks and threats.

Program Performance

Each year we set program performance targets for the coming fiscal year (FY) and measure progress against current targets. The program uses four key numeric metrics to indicate overall progress toward the elimination of threats to human health and water quality.

1. Cases closed. Case closure is granted when contamination no longer poses a threat to water quality nor a risk to public health and safety.
2. Cases moved into remediation. Cases in remediation have started interim remediation to address urgent concerns while investigation continues, or comprehensive remediation to address the full extent of the problem.
3. Cases where health exposure to contamination is stopped. Human health exposure is stopped through abatement actions to limit contact with site contaminants (i.e., mitigation) or remediation (i.e., cleanup). Most cases where human health exposure is ongoing are due to confirmed vapor intrusion of volatile contaminants into an occupied building. These cases are our highest priorities.
4. Cases where migration of contamination is controlled. Contaminant migration is controlled through actions to remove or reduce the contaminant source, such as removal of a leaking tank or excavation of contaminated soil. Most cases where groundwater contaminant migration is ongoing are due to a groundwater plume discharging to a supply well, creek, or the Bay. These cases are also high priorities.

Following are summary workload and performance statistics for the program.

- We currently have 620 active cases.
- We close about 25 to 30 cases per year and typically add about 20 new cases per year, although the number of new cases has been decreasing in recent years.
- We move about 25 cases into remediation per year.
- We have confirmed that human health exposure is not occurring at 94% of our sites that have been fully investigated; the remaining 6% are high priorities.
- We have confirmed that contaminant migration is controlled at 96% of our sites that have been fully investigated; the remaining 4% are high priorities.
- Performance targets and progress are summarized below.

Fiscal Year	Target	Actual
	Cases Closed	
2023-24	20	30
2024-25	25	30*
	Cases into Remediation	
2023-24	15	25
2024-25	15	26*

* As of May 12, 2025

Future Trends and Challenges

We are working on a growing number of cases involving per- and polyfluoroalkyl substances (PFAS). This work is driven in part by recent State Water Board orders issued to airports, metal platers, and bulk fuel terminals, and the discovery of several public supply wells in the Santa Clara and Livermore Valleys affected by PFAS contamination. This work has unique challenges due to the ubiquity and legal use of PFAS in products and processes, high mobility in the environment, high treatment costs, and drinking water standards for only a few of the hundreds of PFAS compounds that exist. In 2021, we were given five staff positions to address these and other challenges; however in 2024 we lost one staff position in the program to budget cuts.

In 2023, we adopted an approach to addressing climate-driven sea level and groundwater rise at cleanup sites. This includes identifying cleanup sites that are within areas vulnerable to sea level and groundwater rise and evaluating the potential adverse effects on site contamination. These findings are incorporated into our decision making, including our low-threat assessment process for case closure.

During the last fiscal year, new redevelopment projects have slowed but continue to be a driver of work in the program. New guidance related to vapor intrusion assessment and mitigation allows staff to better regulate vapor intrusion mitigation systems to ensure their long-term effectiveness. At the same time, many sites, such as historic dry cleaners that impart significant vapor intrusion risk to nearby residential and commercial buildings, have limited ability to afford the considerable investigation and cleanup costs. We continue to work with our State Water Board’s Site Cleanup Subaccount Program to prioritize grant funding for high-risk sites and sites in disadvantaged communities; however, the fund is insufficient to meet the Statewide demand.

We plan to present two information items to the Board later this year. The first informational item will focus on our low-threat case assessment strategy. The second informational item will provide more details about the Site Cleanup Subaccount Program grant funding program and the cleanup work we have been able to accomplish because of that program.

Staff Updates (Eileen M. White)



Nathaniel Goetz joins the Northeast Bay Section of the Watershed Management Division as a Water Resources Control Engineer. He will be working on 401 water quality certifications. Nathaniel has a Bachelor of Science in Environmental Design and Sustainability from California Polytechnic State University, San Luis Obispo. He also has a Master of Science in Environmental Engineering from Columbia University, concentrating in Water Resources and Climate Risks. During his graduate program, Nathaniel worked as a NASA Climate Change Research Initiative Fellow at the Lamont-Doherty Earth Observatory, where he investigated the impacts of accelerating sea-level rise and development on New York City tidal wetlands. Nathaniel enjoys kayaking, birding, surfing, and biking.



On June 30, 2025, Keith Roberson will retire after more than 25 years of service in our cleanup programs. Since 2012, Keith has been a senior engineering geologist responsible for directing staff in the oversight of cases in the Land Disposal and Site Cleanup Programs and serving as the Region's Land Disposal Program Manager. He joined the Water Board in 1999 as an engineering geologist in the Toxics Cleanup Division where he oversaw large volatile organic compound cleanups, mostly associated with the semiconductor industry. In 2005, Keith rotated into the Groundwater Protection Division and began overseeing a mix of landfills and Site Cleanup Program sites.

Throughout his career at the Water Board, Keith continually contributed to protecting, preserving and enhancing the Bay Area's water resources. As staff, he had 9 Board orders adopted. He successfully oversaw the cleanup of many complex sites, such as the Mohawk Laboratories site in Sunnyvale, which was vigorously denying responsibility for a mile-long chemical plume with very high concentrations of trichloroethene (TCE) and degradation products that migrated under a dense industrial area. Keith was successful in getting Mohawk Laboratories to accept responsibility for cleanup of the plume. He also oversaw the cleanup of the very large United Technologies Corporation solid rocket motor facility between San Jose and Morgan Hill, which had very large volatile organic compound and perchlorate plumes. Cleanup of the site cost over \$180 million.

As the Land Disposal Program Section Leader, his team has had 68 Board orders adopted; required 40 land disposal facilities vulnerable to the effects of climate change to perform sea level rise vulnerability assessments; required 39 landfills and industrial facilities to sample for PFAS; issued an Emergency Waiver of waste discharge requirements so that Class III landfills could promptly accept disaster-related waste following natural disasters; and issued general waste discharge requirements establishing new waste acceptance criteria at active landfills.

Keith's final accomplishment has been the development of a Land Disposal Program Primer, which was a special project initiated in Fall 2023 to memorialize Keith's extensive knowledge of the Land Disposal Program and its history. This project implements our organizational priority of workforce planning. The Primer will serve as a

resource for not only our staff in the Land Disposal Program, but Land Disposal Program staff across the state and other programs within our Region.

Keith's calm temperament, encyclopedic knowledge, quick wit, and exceptional writing skills have been assets to our regulatory programs. We are grateful for his service and wish him the best in his well-deserved retirement.

Enforcement Actions (Brian Thompson and James Parrish)

The following tables show the proposed and settled enforcement actions since last month's report. As the proposed settlements are pending and could come before the Board, ex-parte communications are not allowed. Please refer to the [Pending Enforcement Liabilities and Penalties](#) webpage for more information on the details of the alleged violation and proposed settlement.

Proposed Settlement

The following is noticed for a 30-day public comment period. If no significant comments are received by the deadline, the Executive Officer will sign the order implementing this settlement.

Discharger	Violation(s)	Proposed Penalty	Comment Deadline
Allstate Plastics LLC	Failure to comply with Industrial Stormwater General Permit	\$155,844	June 19, 2025

Settled Action

On behalf of the Board, the Executive Officer approved the following settlement:

Discharger	Violation(s)	Imposed Penalty	Supplemental Environmental Project
DuPont Specialty Products USA, LLC and Corteva Remediation Group	Discharge limit violations	\$6,000	-

401 Water Quality Certification Applications Received (Rebecca Nordenholt)

The table below lists those applications received for Clean Water Act section 401 water quality certification from April 10 through May 14, 2025. A check mark in the right-hand column indicates a project with work that may be in the San Francisco Bay Conservation and Development Commission (BCDC) jurisdiction.

Project Name	City/Location	County	May have BCDC Jurisdiction
F02C95 San Lorenzo Creek Storm Damaged Bank Permanent Restoration Behind 1950 And 1980 Wingate Way in Hayward	Hayward	Alameda	
2023 Storm Damage Repairs – Phase I Project	Multiple	Alameda	
Howard Terminal Wharf Demolition Phase 1	Oakland	Alameda	X
Alameda Zone 7 2025 PL84-99 Project	Pleasanton	Alameda	
San Lorenzo Creek Concrete Channel Emergency Repair	San Lorenzo	Alameda	
F02C99 San Lorenzo Creek (Line B) Concrete Channel Temporary Stabilization Downstream of Washington Ave	San Lorenzo	Alameda	
Flood Control Levee Project-Geotechnical Investigation	Concord	Contra Costa	X
MOTCO Operations and Pier Maintenance Dredging	Concord	Contra Costa	X
Bank Repair Stanwood Lane	Lafayette	Contra Costa	
1003 Carol Lane Bank Repairs	Lafayette	Contra Costa	
City of Pittsburg Riprap Replacement Project	Pittsburg	Contra Costa	X
10 Sylvan Ln Creek Bank Erosion Protection Project	Ross	Marin	
EA-4AC70 7.34 miles of pavement preservation SR 101	San Rafael, Larkspur	Marin	
Keil Residence	Tiburon	Marin	X
Big Rock Trail Stream Crossing Replacement Project	Unincorporated	Marin	
Ignacio-Alto-Sausalito #1 60kV Boardwalk Replacement Project	San Rafael	Marin	X
Silverado Resort - Boring under creek	Napa	Napa	

Project Name	City/Location	County	May have BCDC Jurisdiction
Duckhorn Vineyards Winery	St. Helena	Napa	
Rossi Road Bridge Replacement	St. Helena	Napa	
Pillar Point Harbor Boat Launch Improvements Project	El Granada	San Mateo	
Bank Erosion Protection Project at 16320 Alexander Ct	Monte Sereno	Santa Clara	
Microsoft SJC02 Data Center Project	San Jose	Santa Clara	
USACE Downtown Guadalupe Riverbank Repair PL 84-99 Project	San Jose	Santa Clara	
Shoreline Park Tide Gate Replacement Project	Mountain View	Santa Clara	X
Highway 12 Logistics Center Project	Suisun City	Solano	
Riparian Corridor Restoration in Upper Calabazas Creek	Glen Ellen	Sonoma	