



Central Valley Regional Water Quality Control Board

24 February 2026

Nina Cavett-Cox
Regulatory Specialist
Hetch Hetchy Water and Power
San Francisco Public Utilities Commission
P.O. Box 160
Moccasin, CA 95347

CERTIFIED MAIL
9589 0710 5270 1470 8207 13

NOTICE OF APPLICABILITY; STATE WATER RESOURCES CONTROL BOARD ORDER WQ-2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; CITY AND COUNTY OF SAN FRANCISCO; O'SHAUGHNESSY WASTEWATER TREATMENT FACILITY; TUOLUMNE COUNTY

On 22 May 2024, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) received a Report of Waste Discharge (RWD) prepared by AEW Engineering, Inc. on behalf of the City and County of San Francisco, San Francisco Public Utilities Commission (PUC) requesting coverage under State Water Resources Control Board Order WQ-2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order), for the San Francisco PUC's (Discharger), O'Shaughnessy Wastewater Treatment Facility (O'Shaughnessy WWTF). Notice of Applicability (NOA) 97-10-DWQ-R5076 was issued to the Discharger on 14 June 2011 for the O'Shaughnessy WWTF, which enrolled the WWTF under the previous General Order (WQ Order 97-10-DWQ). State Water Resources Control Board General Order WQ-2014-0153-DWQ supersedes General Order 97-10-DWQ.

The May 2024 RWD was submitted in response to a 5 April 2023 13260 directive letter from Central Valley Water Board staff (Staff) requiring the Discharger to submit an updated RWD to enroll the WWTF in General Order WQ-2014-0153-DWQ, however, the May 2024 RWD was not signed and stamped by a registered engineer and did not include a Form 200. Subsequently, and at Staff's request, a signed Form 200 was submitted on 12 June 2024, and the Discharger submitted an updated 28 October 2024 RWD (October RWD) signed and stamped by Kenneth P. Leung (RCE #47529). The Discharger submitted additional information on 11 February 2026, that included a November 1989 agreement between the Discharger and the National Park Service identifying the Discharger as the party responsible for the maintenance

NICHOLAS AVDIS, CHAIR | PATRICK PULUPA, EXECUTIVE OFFICER

and monitoring of the Backpackers Campground septic tanks make up part of the O'Shaughnessy WWTF.

Based on the information provided in the RWD, the O'Shaughnessy WWTF treats and disposes less than 100,000 gallons per day (gpd) of domestic wastewater and is therefore eligible for coverage under the general and specific conditions of the General Order. This letter serves as formal notice that the General Order is applicable to your system and the wastewater discharge described below. You are hereby assigned enrollee number **2014-0153-DWQ-R5417** for your system. This letter and coverage under the General Order supersedes and terminates NOA 97-10-DWQ-R5076.

You should familiarize yourself with the entire General Order and its attachments enclosed with this letter, which describe mandatory discharge and monitoring requirements. Sampling, monitoring, and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate sections of the General Order and the attached **Monitoring and Reporting Program (MRP) No. 2014-0153-DWQ-R5417**. This MRP was developed after consideration of your waste characterization and site conditions described in the attached memorandum.

DISCHARGE DESCRIPTION

The O'Shaughnessy WWTF is located near Hetch Hetchy Reservoir on O'Shaughnessy Dam Road, east of Groveland, California in Tuolumne County as shown on Attachment A - Site Location Map. The O'Shaughnessy WWTF is owned by the City and County of San Francisco and operated by the Hetch Hetchy Water and Power Division of the San Francisco PUC. The WWTF is within Yosemite National Park and is set in a forested area that ranges from approximately 3,600 feet to 3,900 feet above mean seal level. The area may experience snow in the winter months.

Wastewater is generated from a group of cottages and public restrooms in the O'Shaughnessy Dam area. The cottages provide housing for staff stationed at the O'Shaughnessy Dam, guests that stay at the cottages, and visitors/backpackers who use the public restrooms and stay at the nearby Backpackers Campground. No recreational vehicle waste is allowed into the system. Treatment and disposal facilities consist of a lift station, four septic tanks, a leach field, and a spray disposal field. Disposal is either to the leach field, spray field, or both. The spray field is used mostly during the summer months and early fall (May through October) when there is no forecast precipitation or snow on the ground. The leach field is used throughout the remainder of the year.

The RWD and Order 97-10-DWQ indicate the average discharge from the WWTF is about 7,000 gpd in dry weather and the maximum flow is approximately 10,000 gpd. The design flow of the system is 20,000 gpd; however, the 2023 Annual Self-Monitoring Report indicates actual flows are much lower. During 2023, the daily average flow was about 1,840 gpd with monthly daily flows ranging from 92 gpd in December to 7,350 gpd in March.

The RWD indicates that upgrades to the WWTF system were completed in fall 2024, which included removal and replacement equipment and features. These upgrades are discussed in greater detail in the enclosed memorandum.

FACILITY SPECIFIC REQUIREMENTS AND EFFLUENT LIMITATIONS

The Discharger will maintain exclusive control over the discharge and shall comply with the terms and conditions of this NOA, General Order 2014-0153-DWQ, including all attachments, and MRP No. 2014-0153-DWQ-R5417.

In accordance with Section B.1.a of the General Order, the monthly average total discharge from the WWTF to the leach field or to the spray field **shall not exceed 20,000 gpd.**

The General Order states in Section B.1 that the Discharger shall comply with the setbacks as described in Table 3 of the General Order. This table summarizes different setback requirements for wastewater treatment system equipment, activities, land application areas, and storage and/or treatment ponds from sensitive receptors and property lines, where applicable. The Discharger shall comply with the applicable setback requirements, as summarized in the Table 1 below:

Table 1 - Site Specific Applicable Setback Requirements

<i>Equipment or Activity</i>	Domestic Well (feet)	Flowing Stream (feet)	Ephemeral Stream Drainage (feet)	Property Line (feet)	Lake or Reservoir (feet)
<i>Septic Tank, Treatment Unit, Treatment System, or Collection System</i>	150	50	50	5	200
<i>Leach Field</i>	100	100	50	5	200
<i>Land Application/Spray Field (undisinfected secondary recycled water) (see 1 below)</i>	150	100	100	50/ 100	200

1. No spray irrigation of any recycled water, other than disinfected tertiary recycled water, shall take place within 100 feet of a residence or a place where public exposure could be similar to that of a park, playground, or school yard. Additional restrictions for spray irrigation of recycled water are contained in the California Code of Regulations, title 22, section 60310(f).

The Discharger shall comply with all applicable sections of the General Order, including:

- Section B.2 - Septic Systems
- Section B.6 - Subsurface Disposal Systems
- Section B.7 - Land Application and/or Recycled Water Systems
- Section B.8 - Sludge/Solids/Biosolids Disposal
- Section C.1 - Groundwater and Surface Water

Provision E.1 of the General Order requires enrolled dischargers to prepare and implement the following reports **by 90 days** of issuance of the NOA:

- Spill Prevention and Emergency Response Plan (Provision E.1.a.)
- Sampling and Analysis Plan (Provision E.1.b)

A copy of the Spill Prevention and Emergency Response Plan and the Sampling and Analysis Plan shall be maintained at the WWTF and made available to the Staff upon request.

As stated in Section E.2.w., in the event of any change in control or ownership of the O'Shaughnessy WWTF, the Discharger must notify the succeeding owner or operator of the existence of this General Order by letter, a copy of which shall be immediately forwarded to the Central Valley Water Board Executive Officer.

Failure to comply with the requirements in this NOA, General Order 2014-0153-DWQ, with all attachments, and **MRP No. 2014-0153-DWQ-R5417** could result in an enforcement action authorized by provisions of the California Water Code. Discharge of waste other than those described in this NOA is prohibited. If the method of waste disposal changes from that described in this NOA, you must submit a new Report of Waste Discharge describing the new operation.

The required annual fee specified in the annual billing from the State Water Board shall be paid until this NOA is officially terminated. You must notify this office in writing if the discharge regulated by the General Order ceases, so that we may terminate coverage and avoid unnecessary billing.

On 31 May 2018, the Central Valley Water Board adopted Basin Plan amendments incorporating new strategies for addressing ongoing salt and nitrate accumulation in the Central Valley as part of the Central Valley Salinity Alternatives for Long-Term

Sustainability (**CV-SALTS**) initiative. Further details of these strategies are discussed in the enclosed memorandum. As these strategies are implemented, the Central Valley Water Board may find it necessary to modify the requirements of this NOA to ensure the goals of the Salt and Nitrate Control Programs are met.

DOCUMENT SUBMITTALS

All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically via the State Water Resources Control Board's GeoTracker database. GeoTracker is an Internet-accessible database system used by the State Water Board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. This system consists of a relational database, online compliance reporting features, a geographical information system (GIS) interface, and other features that are utilized by regulatory agencies, regulated industries, and the public to input, manage, or access compliance and regulatory tracking data. Guidance for creating an account and submitting reports to the GeoTracker database is provided in the attached MRP.

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 or will be provided upon request (https://www.waterboards.ca.gov/public_notices/petitions/water_quality).

In order to conserve paper and reduce mailing costs, a paper copy of General Order WQO 2014-0153-DWQ has been sent only to the Discharger. Others are advised that the [General Order](#) is available on the State Water Board's website (http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf).

If you have any questions regarding this matter, please contact Jeff Pyle by phone at (559) 445-5145 or by email at Jeffrey.Pyle@waterboards.ca.gov.

Original signed by Alex S. Mushegan

For Patrick Pulupa
Executive Officer

Attachments:

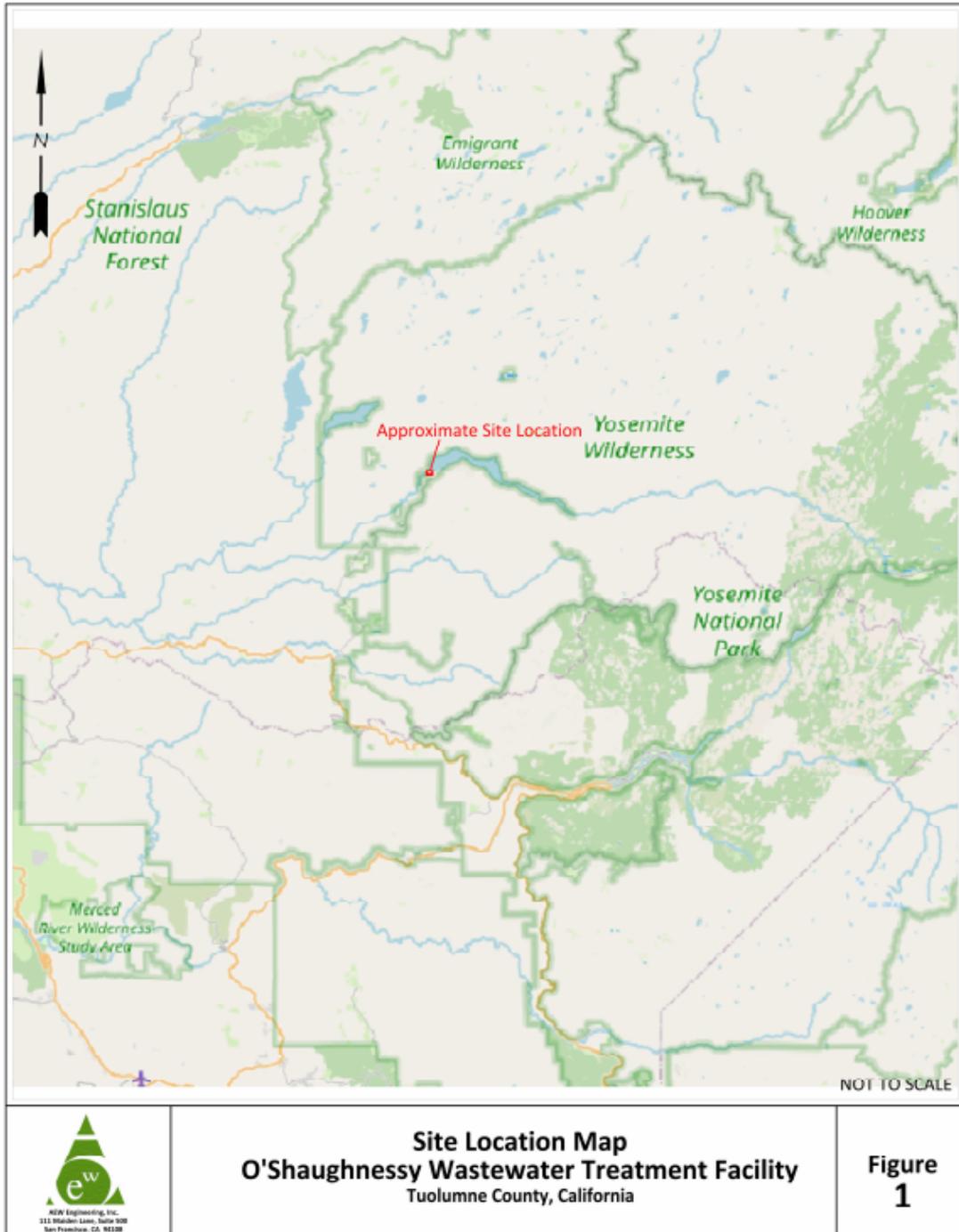
- Attachment A – Site Location Map
- Attachment B – Site Plan
- Attachment C – Process Flow Diagram

Enclosures:

- Monitoring and Reporting Program 2014-0153-DWQ-R5417
- Staff Review Memorandum for San Francisco PUC, O'Shaughnessy WWTF
- State Water Resources Control Board Order WQ 2014-0153-DWQ (Discharger only)

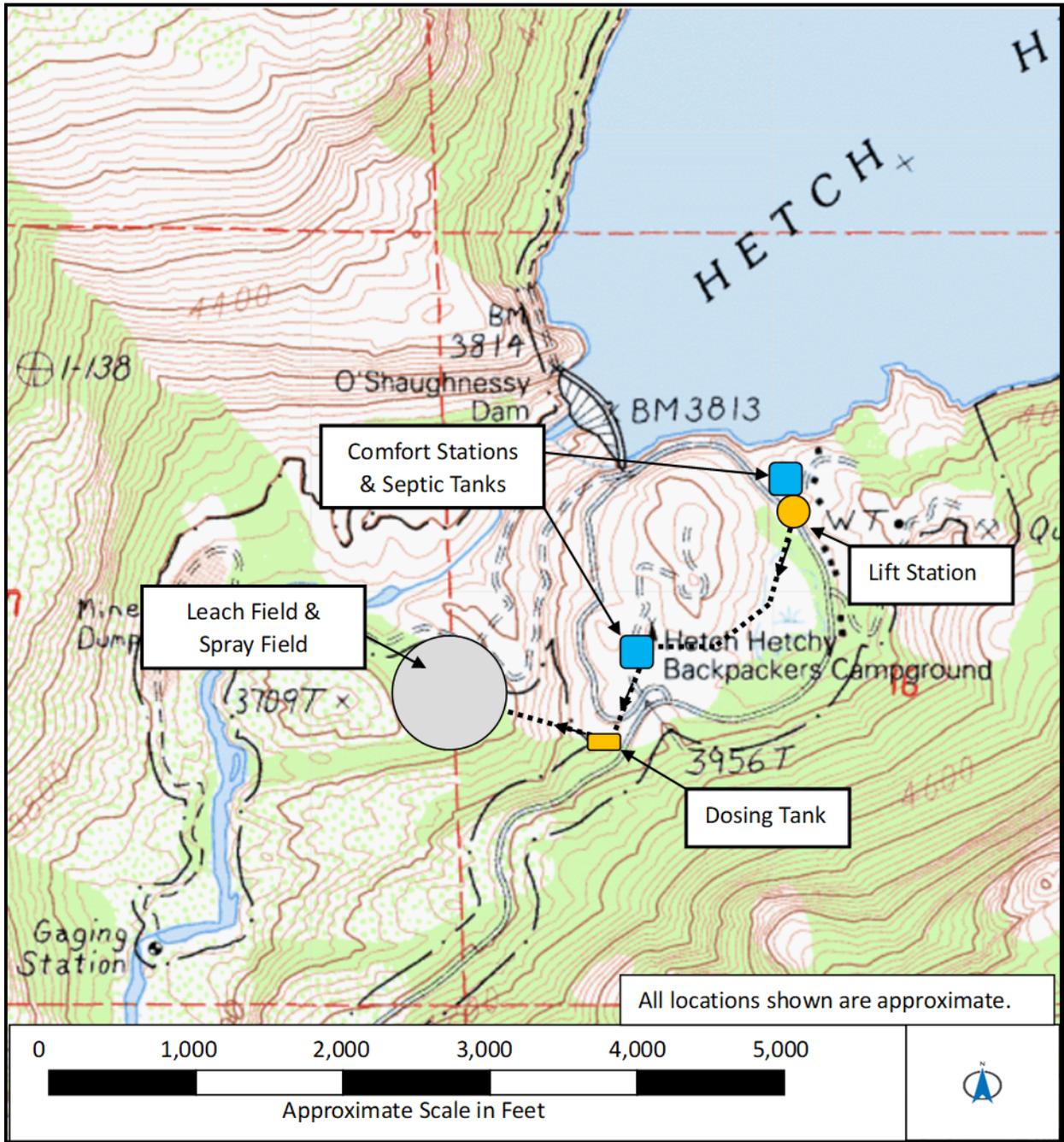
cc's

- Christopher Moskal, State Water Resources Control Board, OCC, Sacramento (via email)
- Ofelia Romero-Maraccini, State Water Resources Control Board, Division of Drinking Water, (via email)
- DWQ-WDR@Waterboards.ca.gov (via email)
- Rb5s-cvsalts@waterboards.ca.gov (via email)
- Omar Mostafa, Central Valley Water Board, Fresno (via email)
- Tuolumne County Environmental Health Division, (via email)
- Nina Cavett-Cox, San Francisco PUC (via email)
- Debbie Webster, CVCWA (via email)



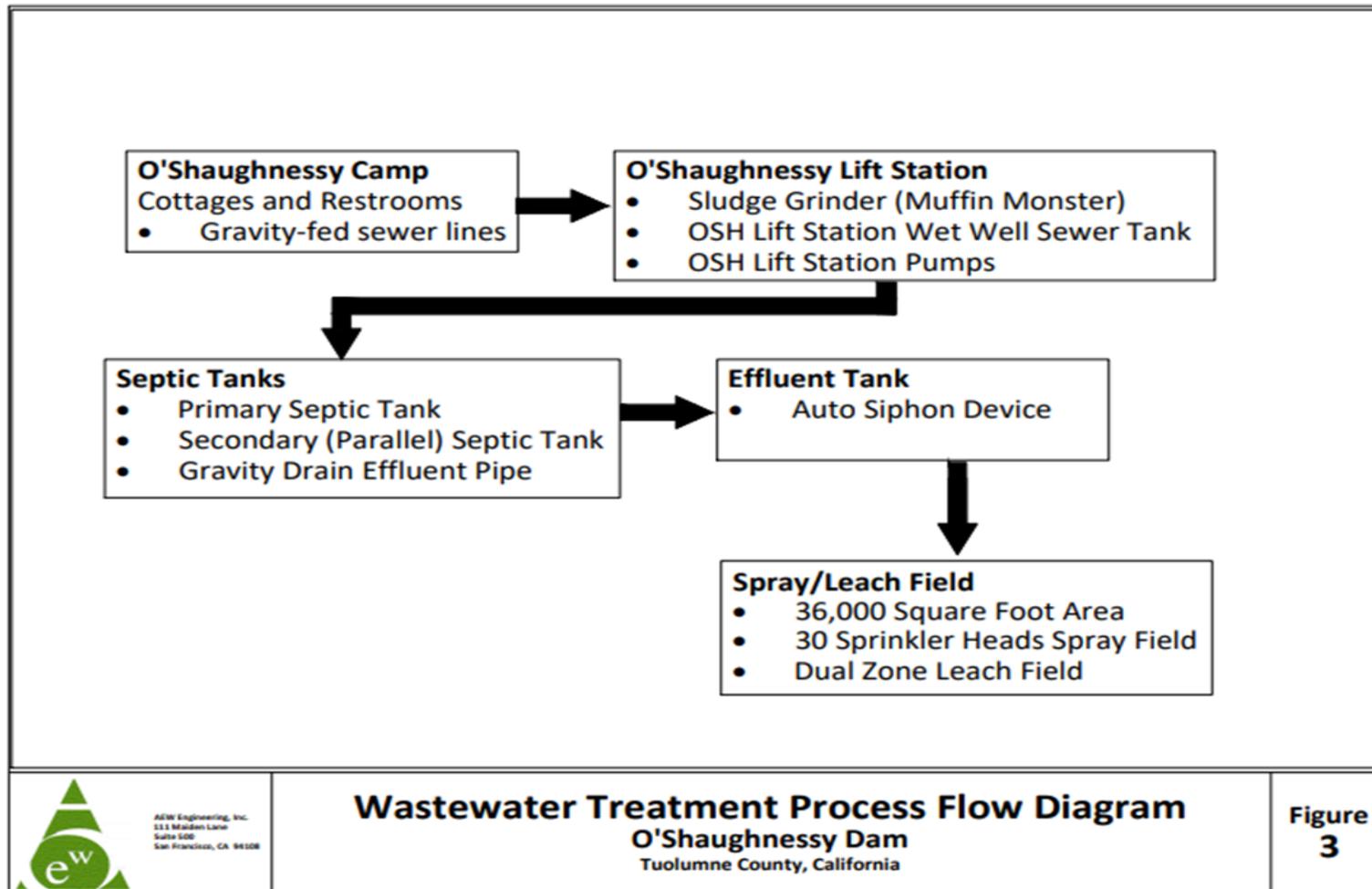
Original published as Figure 1, Site Location Map in 22 May 2024 Report of Waste Discharge prepared by AEW Engineering, Inc., on behalf of the San Francisco Public Utilities Commission.

ATTACHMENT A – SITE LOCATION MAP
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5417



ATTACHMENT B – SITE PLAN

NOTICE OF APPLICABILITY 2014-0153-DWQ-R5417



Original published as Appendix A, 22 May 2024 Report of Waste Discharge prepared by AEW Engineering, Inc., on behalf of the San Francisco Public Utilities Commission

ATTACHMENT C – PROCESS FLOW DIAGRAM
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5417

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

**MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5417
FOR
SAN FRANCISCO PUBLIC UTILITIES COMMISSION
O'SHAUGHNESSY WASTEWATER TREATMENT FACILITY
TUOLUMNE COUNTY**

This Monitoring and Reporting Program (MRP) describes requirements for the City and County of San Francisco Public Utilities Commission's (San Francisco PUC) O'Shaughnessy Wastewater Treatment Facility (WWTF). This MRP is issued pursuant to Water Code section 13267. The San Francisco PUC (hereafter referred to as Discharger) shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Section 13267 of the California Water Code states, in part:

"In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports and shall identify the evidence that supports requiring that person to provide the reports."

Section 13268 of the California Water Code states, in part:

"(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of Section 13399.2, or falsifying and information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).

(b)(1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with section 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs."

The Discharger owns the WWTF that is subject to the Notice of Applicability (NOA) 2014-0153-DWQ-R5417, which enrolls the WWTF under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for*

Small Domestic Wastewater Treatment Systems (General Order). The reports required in this MRP are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and shall submit the monitoring reports described herein.

All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The name of the sampler, sample type (grab or composite), time, date, location, bottle type, and any preservative used for each sample shall be recorded on the sample chain of custody form. The chain of custody form must also contain all custody information including date, time, and to whom samples were relinquished. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Central Valley Water Board staff.

Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that they are used by a State Water Resources Control Board, Environmental Laboratory Accreditation Program (ELAP) certified laboratory, or:

1. The user is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are maintained and available for at least three years.

SEPTIC TANK MONITORING

All septic tanks shall be inspected and/or pumped at least as frequently as described below. Inspection of sludge and scum depth are not required if the tanks are pumped at least annually.

Table 1 - Septic Tank Monitoring

Parameter	Units	Measurement Type	Frequency
Sludge depth and scum thickness in each compartment of each tank	Feet	Staff Gauge	Annually
Distance between bottom of scum layer and bottom of outlet device	Inches	Staff Gauge	Annually
Distance between top of sludge layer and bottom of outlet device	Inches	Staff Gauge	Annually
Effluent filter condition (if equipped, clean as needed)	Not Applicable	Not Applicable	Annually

Septic tanks shall be pumped when any one of the following conditions exists:

1. The combined thickness of sludge and scum exceeds one-third of the tank depth of the first compartment.
2. The scum layer is within 3 inches of the outlet device.
3. The sludge layer is within 8 inches of the outlet device.

If a septic tank is pumped during the year, the pumping report shall be submitted with the annual report. All pumping reports shall be submitted with the next regularly scheduled monitoring report. At a minimum, the record shall include the date, nature of service, service company name, and service company license number

SUBSURFACE DISPOSAL AREA MONITORING

Effluent samples shall be collected from a location that is representative of the effluent quality after treatment in the septic tanks but prior to discharge to the leach field and spray field. Monitoring of the combined flows from the septic tanks to the leach fields and/or the spray fields shall be conducted as listed below:

Table 2 – Leach Field/Spray Field Effluent Flow Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Flow	Gpd	Metered (see 1 below)	Continuous	Annually
Electrical Conductivity (EC)	umhos/cm	Grab	Quarterly	Annually
Biochemical Oxygen Demand (BOD)	mg/L	Grab	Quarterly	Annually
Total Suspended Solids (TSS)	mg/L	Grab	Quarterly	Annually

1. Flow rate may be metered or estimated based on potable water supply meter readings or other approved method.

LEACH FIELD INSPECTION/MONITORING

In general, monitoring shall be sufficient to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals and/or deep-rooted plants are not present, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the disposal area (and any sand or media filter, if present). Monitoring of the leach field systems shall, at a minimum, include the monitoring specified in Table 3.

Table 3 – Leach Field Monitoring

Constituent	Inspection Frequency	Reporting Frequency
Pump Controllers, Automatic Valves, etc.	Quarterly	Annually
Nuisance Odor Condition	Quarterly	Annually
Saturated Soil Conditions	Quarterly	Annually
Plant Growth	Quarterly	Annually
Vectors or Animal Burrowing	Quarterly	Annually

SPRAY FIELD AREA MONITORING

The Discharger shall monitor the spray field area when wastewater is applied. If wastewater is not applied during a reporting period, the monitoring report shall so state. Spray field monitoring shall include the following:

Table 4 – Spray Field Monitoring

Constituent	Units	Sample Type	Sampling Frequency	Reporting Frequency
Wastewater Flow	gpd	Meter	Monthly	Annually
Application Rate	gal/acre/mo	Calculated	Monthly	Annually
Soil Erosion Evidence	---	Observation	Monthly	Annually
Soil Saturation/ Ponding	---	Observation	Monthly	Annually
Nuisance Odors/Vectors	---	Observation	Monthly	Annually
Discharge Off-Site	---	Observation	Monthly	Annually

SOLIDS DISPOSAL MONITORING

The Discharger shall report on the handling and disposal of all solids (e.g. screenings, grit, sludge, biosolids, etc.) generated at the wastewater treatment facility. Records shall include the name/contact information for the hauling company, the type and amount of waste transported, the date removed from the wastewater system, the disposal facility name and address, and copies of analytical data required by the entity accepting the waste. These records shall be submitted as part of the annual monitoring report.

REPORTING

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, solids, etc.), and reported analytical or visual inspection results are readily discernable. The data shall be summarized to clearly

illustrate compliance with the General Order and NOA as applicable. The results of any monitoring done more frequently than required at the locations specified in the MRP shall be reported in the next regularly scheduled monitoring report and shall be included in calculations as appropriate.

GeoTracker Electronic Reporting Requirements: All monitoring reports and monitoring results shall be submitted to GeoTracker in accordance with the timeframes specified below and in searchable Portable Document Format (PDF). The Discharger shall follow the applicable Electronic Submittal of Information (ESI) requirements under the Facility-specific **Global Identification Number WDR100057029** at the GeoTracker database (<https://geotracker.waterboards.ca.gov/esi/login.asp>).

In order to submit reports electronically, the Discharger shall create a secure GeoTracker Electronic Submittal of Information (ESI) account and log in credentials, claim their facility by requesting access in GeoTracker, and finally uploading PDF copies of the required reports via the ESI portal as outlined in the GeoTracker ESI Beginner's Guide for Responsible Parties (Beginner's Guide) linked below. The Discharger may complete the above tasks by accessing the 'Getting Started' section on the GeoTracker ESI webpage (https://www.waterboards.ca.gov/ust/electronic_submittal/index.html).

Additional GeoTracker support information can be found at the following:

- a. 'Guides/Resources' document link in the "Tools" on the Discharger's GeoTracker ESI account.
- b. Resources on the GeoTracker ESI website, such as the Beginner's Guide (https://www.waterboards.ca.gov/ust/electronic_submittal/docs/geotracker_esi_rp_beginners_guide_revisedoct2019.pdf)
- c. General GeoTracker Help Desk contact information:

Phone: 1-866-480-1028, Email: geotracker@waterboards.ca.gov

A transmittal letter shall accompany each monitoring report. The letter shall include a discussion of all violations of this MRP during the reporting period and actions taken or planned for correcting each violation. If the Discharger has previously submitted a report describing corrective actions taken and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain a statement by the Discharger or the Discharger's authorized agent certifying under penalty of perjury that the report is true, accurate and complete to the best of the signer's knowledge.

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, groundwater, etc.), and reported analytical result for each sample are readily discernible. The data shall be summarized in such a

manner to clearly illustrate compliance with waste discharge requirements and spatial or temporal trends, as applicable. The results of any monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall be reported in the next scheduled monitoring report.

Laboratory analysis reports shall be included in the monitoring reports. All laboratory reports must also be retained for a minimum of three years. For a discharger conducting any of its own analyses, reports must also be signed and certified by the chief of the laboratory.

Monitoring information shall include the method detection limit (MDL) and the Reporting limit (RL) or practical quantitation limit (PQL). If the regulatory limit for a given constituent is less than the RL (or PQL), then any analytical results for that constituent that are below the RL (or PQL) but above the MDL shall be reported and flagged as estimated.

All monitoring reports that involve planning, investigation, evaluation or design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1.

ANNUAL REPORT

Annual Reports shall be submitted to the Regional Water Board **by March 1st following the monitoring year**. The Annual Report shall include the following:

1. Results of all required monitoring with tabular and graphical summaries of all monitoring data collected during the year.
2. A comparison of monitoring data to the requirements (including the flow limitation), disclosure of any violations of the NOA and/or General Order, and an explanation of any violation of those requirements. Data shall be presented in tabular format.
3. An evaluation of the performance of the wastewater treatment system, including discussion of the capacity issues, nuisance conditions, system problems and a forecast of the flows anticipated in the next year.
4. A copy of the logs from the wastewater collection system observations conducted during the year. The Discharger shall note whether repairs were conducted or need to be conducted.
5. Copies of laboratory analytical report(s) and chain of custody form(s).
6. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.

7. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
8. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.

A letter transmitting the monitoring reports shall accompany each report. The letter shall report violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

This revised MRP replaces MRP 97-10-DWQ issued on 14 June 2011. The Discharger shall begin implementing the above monitoring program as of the date of this MRP.

Ordered by

Original signed by Alex S. Mushegan
For Patrick Pulupa, Executive Officer

24 February 2026
(Date)

GLOSSARY

EC	Electrical conductivity at 25° C
Continuous	The specified parameter shall be measured by a meter continuously.
Daily	Every day except weekends or holidays
Monthly	Once per calendar month
Quarterly	Once per calendar quarter
Annually	Once per year
mg/L	Milligrams per liter
µg/L	Micrograms per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day
gal/acre/mo	Gallons per acre per month
mgd	Million gallons per day
MPN/100 mL	Most probable number [of organisms] per 100 milliliters
NA	Denotes not applicable
s.u.	Standard pH units



Central Valley Regional Water Quality Control Board

TO: Alexander S. Mushegan
Supervising Water Resource Control Engineer

FROM: Bryan Rock
Senior Engineering Geologist
PG 9864



Jeffrey S. Pyle
Engineering Geologist
PG 7375



DATE: 24 February 2026

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; CITY AND COUNTY OF SAN FRANCISCO, SAN FRANCISCO PUBLIC UTILITIES COMMISSION, O'SHAUGHNESSY WASTEWATER TREATMENT FACILITY; TUOLUMNE COUNTY

On 22 May 2024, Central Valley Regional Water Quality Control Board (Central Valley Water Board) received a *Report of Waste Discharge, O'Shaughnessy Wastewater Treatment Facility* (RWD) prepared by AEW Engineering, Inc. on behalf of the City and County of San Francisco, San Francisco Public Utilities Commission (Discharger). The RWD was submitted to support coverage under State Water Resources Control Board Order WQ-2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order), for the Discharger's O'Shaughnessy Wastewater Treatment Facility (O'Shaughnessy WWTF).

Central Valley Water Board staff (Staff) required the submittal of an updated RWD in a 5 April 2023 letter (Directive) sent to the Discharger, in accordance with Water Code, Section 13260. The Directive indicated the WWTF was eligible for coverage under the General Order. The initial RWD submitted in May 2024 RWD was not signed and stamped by a registered engineer and did not include a Form 200. Central Valley Water Board staff requested and received a signed Form 200 on 12 June 2024, and the

Discharger submitted an updated 28 October 2024 RWD (October RWD) that was signed and stamped by Kenneth P. Leung (RCE #47529).

On 11 February 2025, the Discharger provided a 9 November 1989 letter from the National Park Service (Park) regarding responsibilities for facilities and services at the O'Shaughnessy Dam area. The letter states in Finding 3 that all septic tanks discharging to the O'Shaughnessy WWTF are the responsibility to operate and maintain. As a result, the Notice of Applicability (NOA) does not identify the Park as a discharger for the O'Shaughnessy WWTF.

This memorandum provides a summary of Central Valley Water Board staff's review of the October 2024 RWD, and other provided documents, and the applicability of the Facility's discharge to be covered under the General Order.

BACKGROUND INFORMATION

The RWD indicates that the O'Shaughnessy WWTF was constructed in 1938, and portions may be older, as the Hetch Hetchy dam was constructed in 1919. The lift-station and septic tanks were reconstructed in 1985 and 1990, respectively. The WWTF serves a group of cottages and public restrooms in the O'Shaughnessy Dam area that provide housing for staff stationed at the O'Shaughnessy Dam area, guests that stay at the cottages, and visitors/backpackers to the area who use the public restrooms.

DESCRIPTION OF DISCHARGE

The WWTF consists of a lift station, four septic tanks, a leach field, and a spray disposal field. Gravity charged sewer lines direct wastewater from the cottages and public restrooms to the lift station where it undergoes comminution via grinding and then deposited in a wet well storage tank. Proper levels are maintained in the storage tank through float switches and a control panel. Wastewater is then pumped from the lift station to the septic tanks for treatment. Effluent from the septic tanks continues to a final holding tank fitted with an auto syphon device to regulate discharge. When the effluent tank drains, effluent is sent via gravity to the 36,000 sq-ft spray/leach field. Disposal is either to the leach field, spray field, or both. The spray field is used mostly during the summer months and early fall (May through October) when there is no forecast precipitation or snow on the ground. The leach field is used throughout the remainder of the year.

Management of solids in the septic tank occurs on an as-needed basis and includes pumping of solids into a waste hauling truck and disposal at the Sonora Regional Wastewater Plant.

The Discharger measures the wastewater flow rate using flow meters and the monthly average daily flow during 2023 was 1,840 gallons per day (gpd), with a minimum flow of 92 gpd in December 2023 and a maximum flow of 7,350 gpd in March 2023, which meets eligibility criteria for coverage under the General Order.

The Discharger indicates that upgrades to the site wastewater system began in August 2024 and were completed by the end of 2024. The Discharger removed and replaced equipment and features as discussed below.

The following items were disconnected and replaced:

- Lift Sump Pumps 1 and 2
- Floor Sump Pumps 1 and 2
- Horizontal solids pump
- Pump control panel
- Flow meter
- Solenoid valve, switch, and timers
- 5 kVA single-phase transformers
- 2.4 kVA three-phase service transformers
- 45 Kilowatt, 480-volt Cummins propane generator
- Conduit for battery charger

Following the disconnection and removal of the equipment identified above, the following upgrades to the system were completed:

- Excavation of a French drain lined with geotextile fabric, filled with crushed rock and installation of a new Schedule 80 PVC conduit to the generator battery charger.
- Site grading and runoff improvements to direct stormwater away from the Lift Station building.
- Installation of new lift station pumps 1 and 2, and new floor sump pumps 1 and 2.
- Installation of a concrete pad meeting appropriate standards for pad-mounted generators.
- Installation and connection of new generators, service transformers and associated electrical equipment.
- Installation of a new automatic transfer switch
- Installation of a new circuit breaker panel
- Applied concrete sealer to all joints of the lift station structure
- Installation of level sensor alarm/status input/output signals in the sewage tank

POTENTIAL THREAT TO WATER QUALITY

The current Order 97-10-DWQ requires only monitoring of the septic tanks and does not require sampling and analysis of wastewater or groundwater. Typical domestic wastewater concentrations are summarized in Table 1 of the General Order.

The October RWD does not discuss underlying groundwater quality or the water supply for the WWTF. While there are some well records for the site (see below), there does not appear to be any domestic wells present at the site and none are documented as in use by the Discharger. The water supply for the O'Shaughnessy WWTF is provided from the diversion tunnel for the O'Shaughnessy Complex (Hetch Hetchy Reservoir water), and the water quality is of good quality for most constituents. Water quality results from 2023 are shown in Table 1 below.

Table 1 – Hetch Hetchy 2023 Water Quality Results

Constituent	Units	Average	Range	Water Quality Objective
Chloride	mg/L	7.9	4.1 - 16	250/500
EC	µmhos/cm	112	54 - 223	900/1600
Sulfate	mg/L	4.2	4.1 – 4.2	250/500
Iron	µg/L	33	32 - 34	300
Manganese	µg/L	2.3	2.3 – 2.4	50

A review of the Department of Water Resources (DWR) Sustainable Groundwater Management Act database produced seven well completion reports for the site, four of which were for shallow soil borings completed to only 15 feet below ground surface (bgs). Two well completion reports and a well destruction report were available for three wells completed between 700 and 1,005 feet bgs. Well 01N20E16 was drilled in granitic bedrock to a depth of 1,005 feet bgs in March 1989 and included an annular seal from 50 feet bgs to the ground surface. A November 1997 well record for Well 01N20E16-M indicates that it was installed to a depth of 700 feet bgs, included an annular seal from 105 feet bgs to the surface, and the static water level recorded after installation was 270 feet bgs. A well destruction log for an unidentified 700 foot well reported a static water level of 75 feet bgs in December 2022.

Soils in the vicinity of the leach/spray field area are described by the Natural Resources Conservation Services Web Soil Survey as consisting of "Rock Outcrop – Humic Dystroxerepts-Humic Lithic Haploxerepts," with 0 to 30 percent slopes, joints, and mountain slopes. The unit is described as having a typical profile of very cobbly loamy sand, and the May 2011 RWD reported the soil percolation rate of 3.96 minutes/inch. Per Table 5 of the General Order, a percolation rate of 3.94 min/in requires a minimum

20-foot depth to groundwater as measured from the base of the leachfield trench. As indicated in the previous section, based on two well completion reports and one well destruction report, the depth to water in the wells ranged from 70 to 275 feet bgs at the time the work was performed (1989 to 2002) and would meet the 20-foot minimum separation requirement.

Based on available information, including the quality of the source water (Hetch Hetchy Reservoir water), the expected strength of the domestic wastewater, and the existing flow rates, the O'Shaughnessy WWTF appears to meet the conditions to comply with the General Order.

MONITORING REQUIREMENTS

Monitoring requirements included in the following sections from Attachment C of the General Order are appropriate for this discharge:

- Septic Tank Monitoring
- Sub-Surface Disposal (Leach field) Monitoring
- Spray Field Monitoring
- Solids Disposal Monitoring

NITROGEN LIMIT EVALUATION

The General Order requires that wastewater systems with a flow rate greater than 20,000 gpd be evaluated to determine if nitrogen effluent limits are required, as described in Attachment 1 of the General Order. The O'Shaughnessy WWTF was designed with an influent flow rate of 0.1 mgd or 100,000 gpd. The Discharger states the flows average about 7,000 gpd. Flow data from 2023 indicates that the recent flow through the WWTF is much lower, averaging 1,842 gpd and ranging from 92 gpd to 7,350 gpd. The NOA includes an effluent flow limitation of 20,000 gpd. As such, the Discharger is not required to conduct a nitrogen limit evaluation for the discharge.

SALT AND NITRATE CONTROL PROGRAMS

The Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting (Resolution R5-2018-0034). The Basin Plan amendments became effective on 17 January 2020 and were revised by the Central Valley Water Board in 2020 with [Resolution R5-2020-0057](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/resolutions/r5-2020-0057_res.pdf)

(https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/resolutions/r5-2020-0057_res.pdf).

Pursuant to the Basin Plan amendments, the Discharger was sent a Notice to Comply on 5 January 2021 (**CV SALTS ID: 2331**) with instructions and obligations for the Salt Control Program within one year of the effective date of the amendments. On 12 July

2021 the Discharger submitted a NOI for the Salt Control Program and is participating in the Prioritization and Optimization Study (P&O Study).

For the Nitrate Control Program, the WWTF and disposal areas are outside a valley floor groundwater basin/subbasin and, therefore, are not subject to the Nitrate Control Program at this time. Nevertheless, a Notice to Comply with the Nitrate Control Program may be issued at a later date if the Central Valley Water Board Executive Officer determines it is necessary to protect water quality. Also, in a case where an increase in volume or concentration of a discharge is proposed, a facility may be required to comply with the Nitrate Control Program, if determined by the Board.

More information on the Salt and Nitrate Control Programs can be found at the [CV-SALTS Website](https://www.cvsalinity.org/public-info) (<https://www.cvsalinity.org/public-info>).