

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

**STAFF SUMMARY REPORT: Marcos De la Cruz  
MEETING DATE: December 10, 2025**

**ITEM: 6**

**General Waste Discharge Requirements for Discharges of Groundwater** – Consolidation and reissuance of (1) General NPDES Permit for Volatile Organic Compounds and Fuel, and (2) General NPDES Permit for Groundwater

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**DISCUSSION:**

This Revised Tentative Order (Appendix A) would reissue the *General Waste Discharge Requirements for Discharge or Reclamation of Extracted and Treated Groundwater Resulting from the Cleanup of Groundwater Polluted by Volatile Organic Compounds (VOCs), Fuel Leaks, Fuel Additives, and Other Related Wastes* (VOC and Fuel General Permit) and *General Waste Discharge Requirements for Discharge or Reclamation of Extracted Brackish Groundwater, Reverse Osmosis Concentrate Resulting from Treated Brackish Groundwater, and Extracted Groundwater from Structural Dewatering Requiring Treatment to Surface Waters* (Groundwater General Permit), regulating discharges associated with the extraction and treatment of groundwater impacted by inorganic chemicals, VOCs, per- and polyfluoroalkyl substances (PFAS), fuel-leak compounds, and other synthetic organic compounds in the San Francisco Bay Region. These discharges occur at active or closed cleanup sites, construction sites, underground parking garages, among other locations, and flow to surface waters, such as creeks, streams, rivers, and San Francisco Bay. The Revised Tentative Order would continue to allow these discharges subject to the permit requirements.

The Revised Tentative Order contains updated requirements, including updated selenium and new PFAS effluent limitations and monitoring requirements. Consistent with the U.S. Supreme Court's ruling in *City and County of San Francisco, California v. Environmental Protection Agency* (2025), the Revised Tentative Order does not include receiving water limitations as federal requirements under the Clean Water Act. The Revised Tentative Order does, however, include receiving water limitations for the toxicity water quality objectives as state-only requirements. The Revised Tentative Order must include these receiving water limitations because it relies on the exemption for insignificant discharges under the *State Policy for Water Quality Control: Toxicity Provisions*.

We received comments (Appendix B) on a tentative order and two addenda distributed for public comment. In response to those comments (Appendix C), we revised monitoring and other requirements, and made non-substantive editorial and formatting changes. We expect the Revised Tentative Order to be contested.

**APPENDIX:**

- A. Revised Tentative Order
- B. Comments
- C. Response to Comments

# Appendix A

## Revised Tentative Order

## Appendix B

### Comments

For an electronic copy of the comments, please contact Marcos De la Cruz via email at [Marcos.Delacruz@waterboards.ca.gov](mailto:Marcos.Delacruz@waterboards.ca.gov) or at (510) 622-2365.

## Appendix C

### Response to Comments