

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

STAFF SUMMARY REPORT (Tong Yin/Dylan Garner)  
MEETING DATE: February 8, 2012

**ITEM**                    **5B**

**SUBJECT:**            **North San Mateo County Sanitation District, North San Mateo County Sanitation District Wastewater Treatment Plant and Wastewater Collection System, Daly City, San Mateo County - Reissuance of NPDES Permit**

**CHRONOLOGY:** November 2006 - Permit reissued

**DISCUSSION:**      The Revised Tentative Order (Appendix A) would reissue the NPDES permit for the North San Mateo County Sanitation District's wastewater treatment plant. The District serves about 127,000 people in Daly City and nearby areas in northern San Mateo County. The plant discharges about 7.2 million gallons per day of secondary-treated wastewater through an outfall extending 2,500 feet into the Pacific Ocean.

We received comments from the District and the San Francisco Baykeeper (Appendix B) on a draft distributed for public review. Most notable is the Baykeeper's request to add satellite sewage collection systems as co-permittees. A satellite is that portion of a sewage collection system that is owned and operated by a different entity than the one that owns and operates the wastewater treatment plant to which the satellite is tributary. As noted in the Response to Comments (Appendix C), it has not been the Board's practice to name satellites to an NPDES permit when those satellites do not also own and operate the wastewater treatment plant that discharges to waters of the United States, and we recommend against doing so at this time. In its 2006 action establishing waste discharge requirements for all collection systems, the State Board determined that including satellites in NPDES permits was not widely accepted. Additionally, in 2010, U.S. EPA Region 1 reissued a permit for a Massachusetts facility removing satellites as co-permittees after the U.S. EPA's Environmental Appeals Board determined that U.S. EPA did not sufficiently establish a basis to include satellites. Finally, we note that the Board's practice of not including satellites in NPDES permits has not impaired its ability to enforce against satellites for sanitary sewage overflows (SSOs). Since 2008, out of thirteen enforcement actions for SSOs, four have been against satellites.

We expect this item to remain uncontested, but the commenters could choose to reiterate or expand upon their concerns before the Board.

**RECOMMEN-**  
**DATION:**            Adopt the Revised Tentative Order

**CIWQS:**            Place ID: 244566

**APPENDICES:**    A. Revised Tentative Order  
                          B. Comments  
                          C. Response to Comments