State Water Resources Control Board
Division of Drinking Water

November 13, 2024

PWS Nos. CA3810001, CA3810011 & CA0110018

Andrew DeGraca
Water Quality Director
San Francisco Public Utilities Commission
1657 Rollins Rd
Burlingame, CA 94010-2301

Dear Mr. DeGraca:

San Francisco Public Utilities Commission
Approval to Use Historic Data to Comply with Hexavalent Chromium Initial Monitoring Requirements.

Thank you for submitting San Francisco Public Utilities Commission's (SFPUC) request to use historic groundwater monitoring data to comply with the initial monitoring requirements of the hexavalent chromium regulation. To be approved, the historic data must comply with the following criteria:

1. The data is from a groundwater source(s).
2. The groundwater sample(s) was collected after October 1, 2022.
3. The groundwater sample(s) was analyzed using approved analytical methods (218.6 or 218.7).

The Division of Drinking Water (Division) has reviewed the data and approves the request to grandfather previous hexavalent chromium samples as shown in Tables 1 – 3 below. The SFPUC is required to take the next hexavalent chromium sample either by April 1, 2025, or by the next due date listed in Tables 1 – 3, shown below.

Table 1: Pleasanton Well Fields, System No. CA0110018

Groundwater Source	Historic Hexavalent Chromium Sample Date	Historic Data Approved?	Next Hexavalent Chromium Sample Due By (Frequency)
Well Field A, North	6/13/24	Yes	During 2027 (Triennial)
Well Field B, South	6/13/24	Yes	During 2027 (Triennial)

Table 2: San Francisco Regional Water System, System No. CA3810001

Groundwater Source	Historic Hexavalent Chromium Sample Date	Historic Data Approved?	Next Hexavalent Chromium Sample Due By (Frequency)
B Street Well (BSW)	6/27/23	Yes	Q2 2025 (Quarterly)
Colma Boulevard Well (CBW)	No samples on or after 10/1/22	N/A	Within 1 month of startup activity and no later than 12/31/2025
F Street Well (FSW)	No samples on or after 10/1/22	N/A	Within 1 month of startup activity and no later than 12/31/2025
Millbrae Yard Well (MYW)	7/5/23	Yes	During 2026 (Triennial)
Hickey Boulevard Well (HBW)*	No samples on or after 10/1/22	N/A	Within 1 month of startup activity and no later than 12/31/2028
Mission Well (MSW)*	6/27/23	Yes	2032 (1x / 9 years)
Poncetta Drive Well (PDW)*	No samples on or after 10/1/22	N/A	Within 1 month of startup activity and no later than 12/31/2025
Serramonte Boulevard Well (SBW)*	6/27/23	Yes	2032 (1x / 9 years)

* Denotes a standby well in accordance with title 22, section 64414, CA Code of Regs.

Table 3: San Francisco Public Utilities Commission – City Distribution Division, System No. CA3810011

Groundwater Source	Historic Hexavalent Chromium Sample Date	Historic Data Approved?	Next Hexavalent Chromium Sample Due By (Frequency)
Lake Merced Well	7/9/24	Yes	During 2027 (Triennial)
Golden Gate Park Central Well	7/9/24	Yes	Q2 2025 (Quarterly)
Golden Gate Park North Lake Well	7/9/24	Yes	Q2 2025 (Quarterly)
South Sunset Playground Well	7/9/24	Yes	Q2 2025 (Quarterly)
Golden Gate Park South Windmill Well	7/10/24	Yes	Q2 2025 (Quarterly)
West Sunset Playground Well	7/9/24	Yes	Q2 2025 (Quarterly)

Please note that SFPUC requested to conduct annual hexavalent chromium monitoring at a number of well sites where historical sample results have exceeded the 0.010 mg/L maximum contaminant limit (MCL) for the San Francisco Regional Water System and for the SFPUC – City Distribution Division water systems, unless the sources are served to the distribution system, at which time quarterly monitoring would begin. Based upon their current classification as active groundwater sources (permitted to serve the distribution system at any time), and their historical monitoring results indicating levels above the hexavalent chromium MCL, the Division cannot conditionally reduce sampling frequency to once per year (i.e. annual) for these groundwater sources. No language exists within the regulatory text to allow such a monitoring reduction based on an operational situation.

Additionally, the Division understands that Hickey Boulevard Well and Millbrae Yard Well (System No. CA3810001) are not operational (pumping equipment has been removed) and cannot be sampled until repairs are complete. For the Colma Boulevard Well, F Street Well, and Poncetta Drive Well (System No. CA3810001), sampling may be postponed due to repairs that are currently taking place. The Division requests that samples are collected within one month of each well becoming operational but no later than the dates indicated in Table 2 above.

If you have any questions, please contact Yvonne Heaney with this office at 510-620-3463 or by email at Yvonne.Heaney@waterboards.ca.gov.

Sincerely,

Digitally signed by Marco Pacheco
Date: 2024.11.13 11:36:52 -08'00'

Marco Pacheco, P.E.
Sr. Water Resource Control Engineer
San Francisco District

Enclosure: Hexavalent Chromium Data Grandfathering Request Letter dated October 8, 2024

cc: Eddy So, via email:
Eso@sfwater.org
Senior Water Quality Engineer
SFPUC – Water Quality Division

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

Water Quality Division
1657 Rollins Rd
Burlingame, CA 94010
T 650.652.3100
F 650.692.6704

October 8, 2024

Mr. Marco Pacheco, P.E.
San Francisco District Engineer
Division of Drinking Water
State Water Resources Control Board
850 Marina Bay Parkway, Bldg. P, 2nd Floor
Richmond, CA 94804

RE: Request Approval for Satisfying Initial Monitoring of Hexavalent Chromium at Groundwater Sources

Dear Mr. Pacheco:

Pursuant to §64432(b) of California Code of Regulations, we request your approval for accepting the groundwater monitoring results of hexavalent chromium (Cr-6) at our following sources:

- Pleasanton Well Field (PWF)
- San Francisco Local Groundwater (SFGW)
- San Francisco Regional Water System's Groundwater Storage and Recovery (SFRWS-GSR)

The applicable Cr-6 results measured at these groundwater sources are summarized in Table 1A through 1C of Attachment 1 to this letter, whereas Attachment 2 provides supporting information. Please note that all results were analyzed by ELAP-certified laboratories using EPA Method 218.7 or Method 218.6. Most, if not all, of these samples were collected as part of our annual Title 22 monitoring program for all regulated inorganics including Cr-6. Due to the different Cr-6 detection scenarios, we break up our request for waiving the initial Cr-6 monitoring at the individual sources as indicated in the following sections.

1. PWF Well Sources

   If the Cr-6 results (Table 1A) obtained in 2023 and 2024 are acceptable for waiving the initial monitoring requirement with the additional 2022 results being included for the purpose of comparing trends, then we request your approval for Cr-6 monitoring at these sources to be conducted triennially pursuant to §64432(c)(l).

2. SFGW Well Sources

   We request your approval for using the Cr-6 data (Table 1B) obtained through our annual and quarterly monitoring in 2023 and 2024 to meet the initial Cr-6 monitoring requirements for the six well sources. Should this request be granted:

a) We also request your approval that Cr-6 compliance monitoring at the Lake Merced Well be conducted annually.

b) Due to the stable concentrations in the other five wells, we request your approval that compliance monitoring for Cr-6 be conducted annually, unless the wells are operated in drinking water production mode in which quarterly monitoring will then be implemented.

3. SFRWS-GSR Well Sources

As the SFRWS GSR well sources are primarily used in extreme drought periods, they are not in operations during most of the time in normal or wet years. Not only are four of the eight wells currently in standby status, but two of these standby wells (HBW and MYW) have all pumping equipment removed for long-term offsite storage since November 2023. Based on the Cr-6 results in Table 1C, we request your approval for:

a) Acceptance of the 2023 monitoring results for standby wells SBW and MSW to fulfill the initial monitoring requirement and allowing them to be monitored once every Compliance Cycle pursuant to §64414(a).

b) Suspension of the initial Cr-6 monitoring at the standby well HBW until later within the current Compliance Cycle that ends by December 31, 2028, if the monitoring data shown in Table 1C are not accepted for waiving the initial monitoring requirements.

c) Allowance for possible postponement of the initial monitoring at active wells CBW and FSW and standby well PDW to a time beyond April 1, 2025. The production pump was recently reinstalled at each of the three wells, but there are still some repairs that may take a few months to complete. However, we will attempt to complete the work and the initial Cr-6 monitoring as soon as the associated pump tests are done.

d) Acceptance of 2023 monitoring results for the active wells BSW and MYW to fulfill the initial Cr-6 monitoring requirement and allowing continued annual monitoring. If these wells were put into drinking water production mode for an extended period of time, then quarterly monitoring would be conducted.

Please contact Enio Sebastiani at (650) 652-3116 for any questions.

Sincerely,

Andrew DeGraca, P.E.
Water Quality Division Director

Attachment 1: Tables 1A-1C for Groundwater Cr-6 Results Between 2022 and 2024
Attachment 2: Supporting Information

e-cc: Eddy So, WQD
Yvonne Heaney, SWRCB
WQD- Water Boards File 24-09 & Reading File

Table 1A. Cr-6 Monitoring Results for PWF Well Sources Between 2022 and 2024

Well ID	Well Name Description	Sample Date	Method	Laboratory	Value (µg/L)	Reporting Limit (µg/L)
PLEAS_W_F_A_(N)	PLEASANTON WELL FIELD A, NORTH	11-Aug-22	EPA 218.6	Eurofins	4	0.02
PLEAS_W_F_A_(N)	PLEASANTON WELL FIELD A, NORTH	22-Jun-23	EPA 218.7	MB-Inorganics	4.1	0.02
PLEAS_W_F_A_(N)	PLEASANTON WELL FIELD A, NORTH	13-Jun-24	EPA 218.7	MB-Inorganics	4.1	0.02
PLEAS_W_F_B_(S)	PLEASANTON WELL FIELD B, SOUTH	11-Aug-22	EPA 218.6	Eurofins	4.1	0.02
PLEAS_W_F_B_(S)	PLEASANTON WELL FIELD B, SOUTH	14-Sep-23	EPA 218.7	MB-Inorganics	2.4	0.02
PLEAS_W_F_B_(S)	PLEASANTON WELL FIELD B, SOUTH	13-Jun-24	EPA 218.7	MB-Inorganics	3.5	0.02

Table 1B. Cr-6 Monitoring Results for SFGW Sources Between 2022 and 2024

Well ID	Well Name Description	Sample Date	Method	Laboratory	Value (µg/L)	Reporting Limit (µg/L)
SFGW-LMW	Lake Merced PS Production Well	11-Jan-22	EPA 218.7	MB-Inorganics	9.8	0.2
SFGW-LMW	Lake Merced PS Production Well	12-Apr-22	EPA 218.6	Eurofins	8.4	0.02
SFGW-LMW	Lake Merced PS Production Well	25-Oct-23	EPA 218.7	MB-Inorganics	5.4	0.2
SFGW-LMW	Lake Merced PS Production Well	5-Dec-23	EPA 218.7	MB-Inorganics	8.7	0.2
SFGW-LMW	Lake Merced PS Production Well	9-Jan-24	EPA 218.7	MB-Inorganics	8.7	0.2
SFGW-LMW	Lake Merced PS Production Well	9-Jul-24	EPA 218.7	MB-Inorganics	7.5	0.1

SFGW Well Category "**ABOVE**"

Well ID	Well Name Description	Sample Date	Method	Laboratory	Value (µg/L)	Reporting Limit (µg/L)
SFGW-GCW	Golden Gate Park Central PS Well	11-Jan-22	EPA 218.7	MB-Inorganics	27.1	0.4
SFGW-GCW	Golden Gate Park Central PS Well	12-May-22	EPA 218.7	MB-Inorganics	21	0.4
SFGW-GCW	Golden Gate Park Central PS Well	11-Jul-23	EPA 218.7	MB-Inorganics	22.4	0.2
SFGW-GCW	Golden Gate Park Central PS Well	9-Jul-24	EPA 218.7	MB-Inorganics	20.6	0.2
SFGW-NLW	Golden Gate Park North Lake Well	11-Jan-22	EPA 218.7	MB-Inorganics	23.2	0.4
SFGW-NLW	Golden Gate Park North Lake Well	12-Apr-22	EPA 218.6	Eurofins	19	0.02
SFGW-NLW	Golden Gate Park North Lake Well	11-Jul-23	EPA 218.7	MB-Inorganics	19.4	0.2
SFGW-NLW	Golden Gate Park North Lake Well	9-Jul-24	EPA 218.7	MB-Inorganics	18.6	0.2
SFGW-SSW	South Sunset Playground Production Well	11-Jan-22	EPA 218.7	MB-Inorganics	21.4	0.4
SFGW-SSW	South Sunset Playground Production Well	12-Apr-22	EPA 218.6	Eurofins	12	0.02
SFGW-SSW	South Sunset Playground Production Well	11-Jul-23	EPA 218.7	MB-Inorganics	13.9	0.2
SFGW-SSW	South Sunset Playground Production Well	9-Jul-24	EPA 218.7	MB-Inorganics	18.7	0.2
SFGW-SWW	Golden Gate Park South Windmill Well	11-Jan-22	EPA 218.7	MB-Inorganics	12.9	0.2
SFGW-SWW	Golden Gate Park South Windmill Well	12-Apr-22	EPA 218.6	Eurofins	9.8	0.02
SFGW-SWW	Golden Gate Park South Windmill Well	11-Jul-23	EPA 218.7	MB-Inorganics	14.7	0.2
SFGW-SWW	Golden Gate Park South Windmill Well	9-Jul-24	EPA 218.7	MB-Inorganics	14.4	0.2
SFGW-SWW	Golden Gate Park South Windmill Well	10-Jul-24	EPA 218.7	MB-Inorganics	14.4	0.2
SFGW-WSW	West Sunset Playground Production Well	14-Jan-22	EPA 218.7	MB-Inorganics	26.9	0.4
SFGW-WSW	West Sunset Playground Production Well	12-May-22	EPA 218.7	MB-Inorganics	21.5	0.4
SFGW-WSW	West Sunset Playground Production Well	9-Nov-22	EPA 218.7	MB-Inorganics	23.5	0.2
SFGW-WSW	West Sunset Playground Production Well	10-Jan-23	EPA 218.7	MB-Inorganics	22.6	0.2
SFGW-WSW	West Sunset Playground Production Well	11-Apr-23	EPA 218.7	MB-Inorganics	23.4	0.2
SFGW-WSW	West Sunset Playground Production Well	27-Jun-23	EPA 218.7	MB-Inorganics	24.3	0.4
SFGW-WSW	West Sunset Playground Production Well	11-Jul-23	EPA 218.7	MB-Inorganics	24	0.2
SFGW-WSW	West Sunset Playground Production Well	10-Oct-23	EPA 218.7	MB-Inorganics	24.2	0.2
SFGW-WSW	West Sunset Playground Production Well	9-Jan-24	EPA 218.7	MB-Inorganics	22.5	0.4
SFGW-WSW	West Sunset Playground Production Well	9-May-24	EPA 218.6	Eurofins	23	0.04
SFGW-WSW	West Sunset Playground Production Well	9-Jul-24	EPA 218.7	MB-Inorganics	22.9	0.2

Table 1C. Cr-6 Monitoring Results for SFRWS-GSR Well Sources Between 2022 and 2024

Well Status	Pump Status	Well ID	Well Name Description	Sample Date	Method	Laboratory	Value (µg/L)	Reporting Limit (µg/L)
Active	Pump still in Well, not yet tested, needs functional test	GSR-BSW	B Street Well (formerly Serra Bowl Well and CUP-10A)	5-Jan-22	EPA 218.7	MB-Inorganics	27.6	0.4
				5-Jan-22	EPA 218.6	Eurofins	21	0.04
				17-May-22	EPA 218.7	MB-Inorganics	20.8	0.4
				6-Jul-22	EPA 218.6	Eurofins	22	0.04
				27-Jun-23	EPA 218.7	MB-Inorganics	22.6	0.4
Active	Pump still in Well, but need functional test	GSR-CBW	Colma Boulevard Well (formerly CUP-18)	5-Jan-22	EPA 218.7	MB-Inorganics	25.1	0.4
				17-May-22	EPA 218.7	MB-Inorganics	19.5	0.4
				6-Jul-22	EPA 218.6	Eurofins	21	0.04
Active	Pump reinstalled, but need functional test	GSR-FSW	F Street Well (formerly Colma-BART Well and CUP-11A)	5-Jan-22	EPA 218.7	MB-Inorganics	35.8	0.4
				17-May-22	EPA 218.7	MB-Inorganics	26	0.4
				6-Jul-22	EPA 218.6	Eurofins	27	0.04
Active	Pump still in Well, but need functional test	GSR-MYW	Millbrae Yard Well (formerly CUP-M-1)	6-Jan-22	EPA 218.6	Eurofins	6.4	0.02
				7-Jul-22	EPA 218.6	Eurofins	7.1	0.02
				5-Jul-23	EPA 218.7	MB-Inorganics	8.2	0.2
Standby	Pump removed for off-site storage	GSR-HBW	Hickey Boulevard Well (formerly CUP-22A)	6-Jan-22	EPA 218.6	Eurofins	30	0.1
				10-May-22	EPA 218.7	MB-Inorganics	29.1	0.2
				7-Jul-22	EPA 218.6	Eurofins	31	0.04
Standby	Pump removed for off-site storage	GSR-MSW	Mission Well (formerly Treasure Island TC and CUP-23)	3-Mar-22	EPA 218.7	MB-Inorganics	23.7	0.2
				23-Aug-22	EPA 218.6	Eurofins	23	0.2
				21-Nov-22	EPA 218.7	MB-Inorganics	23	0.2
				27-Jun-23	EPA 218.7	MB-Inorganics	22.7	0.4
Standby	Pump reinstalled, but need functional test.	GSR-PDW	Poncetta Drive Well (formerly Lake Merced GC Well and CUP-03A)	5-Jan-22	EPA 218.7	MB-Inorganics	19.3	0.2
				17-May-22	EPA 218.7	MB-Inorganics	14.7	0.2
				6-Jul-22	EPA 218.6	Eurofins	15	0.02
Standby	Pump still in Well	GSR-SBW	Serramonte Boulevard Well (formerly CUP-19)	3-Feb-22	EPA 218.7	MB-Inorganics	13.9	0.2
				5-May-22	EPA 218.7	MB-Inorganics	12.7	0.2
				27-Jun-23	EPA 218.7	MB-Inorganics	13.7	0.2

Note: Cr-6 data for 2024 are not available.

Attachment 2. Supporting Information

1. PWF Well Sources

   There are two well sources (Well A and Well B) in this wholesale community water system that has no retail customers. As shown in Table 1A, the Cr-6 levels in these groundwater sources were relatively steady, with a two-year (2023 and 2024) average at 4.1 µg/L and 2.9 µg/L in Well A and Well B, respectively. These values are less than half of the Cr-6 Maximum Contaminant Level (MCL) of 10 µg/L. Table 1A also includes sample results from 2022 for trending and comparison purposes. As indicated, the Cr-6 levels in these sources do not have a continuous or persistent trend toward higher levels.

2. SFGW Well Sources

   There are six wells in this groundwater system. Table 1B shows the most recent results of Cr-6 monitoring between 2022 and 2024. These results were obtained through the San Francisco Public Utilities Commission's (SFPUC) annual and quarterly monitoring within the two-year period prior to October 1, 2024, the effective date of the Cr-6 regulation. Five of these well sources are grouped into a category labeled "ABOVE", due to their consistent Cr-6 at levels above the MCL. Blending with surface water supplies has been approved by your office as the applicable treatment to meet Cr-6 MCL in the corresponding conditional use letters.

   a) With the inclusion of Cr-6 data gathered in 2022 for trending and comparison purposes, the Lake Merced Well has the levels lower than the MCL. Despite the detections being more than half of the MCL, the trend is not toward higher levels. Therefore, quarterly compliance monitoring of Cr-6 at this well source may not be warranted pursuant to §64432(c)(2). Instead, the SFPUC proposes to continue annual monitoring of Cr-6 at this source, with operational monitoring being conducted as needed when the well is in drinking water production mode.

   b) The Cr-6 levels collected at the ABOVE category wells in 2023 and 2024 were comparable with the corresponding levels in 2022. This suggests a continuous trend of high values above the MCL. Presently, three of these wells (GCW, NLW, and SWW) are supplying water for the irrigation at Golden Gate Park, whereas the fourth well (SSW) has been out of operation since 2019 due to the detection of carbon tetrachloride. As such, these four wells are not in drinking water production mode. The fifth well, WSW, was occasionally put into drinking water production mode for short periods of time in the past few years. Sometimes the operation of WSW occurred quickly and lasted only for a few hours which was insufficient time to schedule staff and equipment for sampling.

      Consistent with the State and federal drinking water monitoring requirements, compliance samples will be collected when the well sources are in representative operations. As such, the well sources will be on a quarterly monitoring schedule when operated in drinking water production mode. These five wells are currently either producing water for irrigation only or not in operation the majority of time since their approval by your office. Nevertheless, all ABOVE category wells will continue to be monitored, at least annually, for tracking the trend of Cr-6 levels. These monitoring schedules have been included in the approved Water Quality Monitoring Plan dated January 24, 2022.

3. SFRWS-GSR Well Sources

The SFPUC implements the GSR project to provide supplemental emergency water supply during extreme drought times. Four of the eight Phase 1 SFRWS-GSR well sources were approved to change to standby status per your 9/24/23 letter. The other four wells, namely, BSW, FSW, CBW, and MYW remain as active sources; however, none of these four wells has been put into drinking water production mode since approval due to the nature of the GSR project. Additionally, the pumps at FSW, CBW and MYW had been removed for repair in the past two years and were recently reinstalled. Therefore, only a limited number of Cr-6 data could be gathered between October 1, 2022, and September 30, 2024. Table 1C contains Cr-6 data collected at the appropriate SFRWS-GSR wells, and these results were obtained using EPA Method 218.7 or Method 218.6. Other than the MYW, the trends of these data show that the Cr-6 levels at the SFRWS-GSR wells are above the MCL but staying stable. Blending with surface water supplies has been approved by your office as the applicable treatment to meet Cr-6 MCL in the corresponding conditional use letters.

Consistent with the State and federal drinking water monitoring practices, compliance samples including quarterly well source monitoring and monthly blend-water monitoring at pertinent points of entry to the transmission system will be collected when the well sources are in representative operations, i.e., drinking water production mode. Similar to the SFGW Well Source monitoring in 2b) above, the SFPUC will continue annual monitoring at the four active wells when the pumps are readily available. Although the annual Cr-6 monitoring at the four active wells are projected to be conducted before the end of 2024, the actual date of sampling could be postponed for a few months pending the completion of all electrical and mechanical repairs and successful functional tests.