### AGENDA

# SAN RAFAEL SANITATION DISTRICT BOARD OF DIRECTORS FRIDAY – FEBRUARY 16, 2024 - 9:00 A.M. SAN RAFAEL CITY HALL 1400 FIFTH AVENUE – CONFERENCE ROOM CD3 SAN RAFAEL, CALIFORNIA 94901

Members of the Public may also participate in Open Session through the following:

Zoom link: https://cityofsanrafael-org.zoom.us/j/86356279311

Or by Phone: 1 669 444 9171 US Meeting ID: 863 5627 9311

Public comments for this meeting can be submitted via email to the District Clerk at <u>Kathryn.Nelson@cityofsanrafael.org</u>. The public comment period opens when the agenda is posted online and will close two hours prior to the start of the meeting. Include your name and the item you would like to provide a written comment on.

To provide comments during the meeting, please use the "raise hand" feature in the Zoom Meeting and the host will notify and unmute you when it is your turn to speak.

Members of the public may speak on Agenda items.

### 1. ROLL CALL

### 2. OPEN PERIOD

Opportunity for the public to address the Board on items not on the agenda. (Presentations are generally limited to 2 minutes.)

### 3. CONSENT CALENDAR

- a. Minutes of the Meeting January 19, 2024.
- **b.** Payments January 2024

### 4. OTHER AGENDA ITEMS

\*a. Discussion on Strategic Planning Efforts for the District.

### 5. INFORMATIONAL ITEMS

**a.** Letter to Regional Water Quality Control Board, dated February 1, 2024, NPDES Permit, Annual Progress Report

# 6. DIRECTOR REPORTS/REQUESTS FOR FUTURE AGENDA ITEMS

## 7. CLOSED SESSION

# a. Public Employee Performance Evaluation

California Government Code Section 54957 Title: District Manager

# 8. ADJOURNMENT

The next scheduled meeting is March 15, 2024.

\*Information not furnished with Agenda.

# SAN RAFAEL SANITATION DISTRICT Minutes of the Regular Meeting January 19, 2024

Regular Meeting In Person

The meeting was called to order at 9:04 A.M. by Chair Kate.

Attendance Kate Colin, Chair

Board: Maribeth Bushey, Secretary/Director

Katie Rice, Director

Attendance Doris Toy, District Manager/District Engineer
Staff: Kris Ozaki, Operations and Maintenance Manager

Philip Buckley, Principal Civil Engineer Tim Tran, Associate Civil Engineer Kathryn Nelson, Administrative Analyst

Attendance Kerry Gerchow, Deputy County Counsel

Other: Paul Causey, Causey Consulting

### 1. **ROLL CALL**

A roll call was taken at 9:04 A.M., Director Bushey, and Chair Kate were present. There being a quorum, the meeting began. Director Rice attended at 9:09 A.M.

### 2. **OPEN PERIOD**

No one was present to address the Board for open period.

### 3. **CONSENT CALENDAR**

- a. Minutes of the Meeting December 15, 2023.
- b. Payments December 2023
- c. Adopt Resolution approving the Marin County Investment Policy as the investment policy for the San Rafael Sanitation District.

**MOTION** by Director Bushey, seconded by Director Kate, to unanimously approve the Consent Calendar, all in favor.

**AYES:** Director Bushey, Director Rice, and Chair Kate

**NOES:** None

**ABSENT:** None Motion Carried

### 4. **OTHER AGENDA ITEMS**

a. Report on bid opening for the Bayside Acres Beach Sewer Relocation Project, Phase B1 and adopt resolution to award contract.

District Manager Toy reviews and updates the Board on the status of the Bayside Acres Beach Sewer Relocation Project Phase B1 and requests the Board to approve award of contract to Pat Nelson Construction, Inc., in the amount of \$407,587.00 pending the receipt of the credit report from Pat Nelson Construction.

**MOTION** by Director Bushey, seconded by Director Kate, to unanimously approve the Award of Contract to Pat Nelson Construction, Inc., in the amount of \$407,587.00 upon receipt of the credit report by 5:00 P.M. on January 26, 2024, all in favor.

**AYES:** Director Bushey, Director Rice, and Chair Kate

NOES: None

**ABSENT:** None Motion Carried

### b. Report on Municipal Resource Group Recommended Workplan.

District Manager Toy reports on the Municipal Resource Group and District Recommended Workplan with discussions on status update and outstanding items.

### c. Report on Staffing Status.

District Manager Toy updated the Board on the status of staffing as well as plans to fill the remaining Construction Inspector vacancy.

### d. Discussion on Strategic Planning for the District.

District Manager and Board discuss the Strategic Planning for the District.

### 5. **INFORMATIONAL ITEMS**

None

### 6. DIRECTOR REPORTS/REQUESTS FOR FUTURE AGENDA ITEMS

a. Board requests a Closed Session item for District Manager Performance Evaluation and Open Session for Sewer Connection Fees at the February meeting.

There being no further business to come before the Board, the regular meeting of
January 19, 2024, was adjourned at 11:01 A.M. with the next scheduled meeting on
February 16, 2024.

	Respectfully submitted,
ATTEST THIS 19th DAY OF JANUARY 2024	Maribeth Bushey, Secretary/Director
Kate Colin, Chair	

SAN RAFAEL SANITATION DISTRICT PAYMENT SUMMARY				
January 1, 2024 - January 31, 2024				
Vendor/Payee	Memo	Class	Account	Amount
ARAMARK UNIFORM SERVICES	Uniforms - weekly service ending 12/19/23	200	2021 · Uniforms	250.71
ARAMARK UNIFORM SERVICES	Uniforms - weekly service ending 12/26/23	200	2021 · Uniforms	250.71
ARAMARK UNIFORM SERVICES	Uniforms - weekly service ending 1/02/24	200	2021 · Uniforms	250.71
ARAMARK UNIFORM SERVICES	Uniforms - weekly service ending 1/09/24	200	2021 · Uniforms	250.71
ARAMARK UNIFORM SERVICES	Uniforms - weekly service ending 1/16/24	200	2021 · Uniforms	276.64
AT&T *1523	Telephone Service - land lines for pump stations and dialers from 12/01/23-1/02/24	100	2534 · Telephone service	614.39
AT&T MOBILITY #1362	Telephone Service - cell phone service through 12/31/23	100	2534 · Telephone service	187.53
AT&T MOBILITY #1362	Telephone Service - cell phone service through 1/03/24	100	2534 · Telephone service	280.65
AT&T MOBILITY #1362	Telephone Service - cell phone service through 11/03/23	100	2534 · Telephone service	359.51
AT&T MOBILITY #9313	Telephone Service - cell phone service from 12/02/23-1/01/24	100	2534 · Telephone service	381.11
BAY AREA AIR QUALITY MANAGEMENT DIS	Pump Stations - San Pedro Pump Station generator permit	200	2359 · Maint- pump sta's & force mains	496.00
BWS DISTRIBUTORS	Safety Equipment - vests	200	2365 · Safety equipment and supplies	96.12
CALAMP WIRELESS NETWORKS CORPORATION	Vehicles - vehicles GPS monthly services	200	2083 · Parts and repairs vehicles	249.30
CALAMP WIRELESS NETWORKS CORPORATION	Vehicles - vehicles GPS monthly services	200	2083 · Parts and repairs vehicles	249.30
CALAMP WIRELESS NETWORKS CORPORATION	Vehicles - vehicles GPS monthly services	200	2083 · Parts and repairs vehicles	249.30
CALCON SYSTEMS, INC.	Pump Stations - Riviera Drive Pump Station update and fix to PLC	200	2359 · Maint- pump sta's & force mains	805.00
CALCON SYSTEMS, INC.	Pump Stations - replace pump for VFD	200	2359 · Maint- pump sta's & force mains	13,450.00
CALIFORNIA CAD SOLUTIONS INC(CALCAD)	Facilities Mapping Services - hosting of facilities mapping subscription	100	4188 · Facilities mapping services	5,940.00
CALIFORNIA DIESEL & POWER INC. (CD&POWER)	Pump Stations - diagnose and replace generator clock for North Francisco Pump Station	200	2359 · Maint- pump sta's & force mains	2,190.41
CALIFORNIA DIESEL & POWER INC. (CD&POWER)	Pump Stations - North Francisco Pump generator diagnostic	200	2359 · Maint- pump sta's & force mains	842.86
CALIFORNIA DIESEL & POWER INC. (CD&POWER)	Pump Stations - Glenwood Pump Station maintenance and diagnostic	200	2359 · Maint- pump sta's & force mains	7,214.31
CALIFORNIA SANITATION RISK MGMT ATH	General Insurance - primary insurance renewal for 12/31/23-12/31/24	100	2059 · General insurance	178,469.49
CAUSEY CONSULTING	Consulting Services - professional services through 12/31/23	100	2325 · Consulting services	4,811.88
CAUSEY CONSULTING	Consulting Services - professional services through 11/30/23	100	2325 · Consulting services	5,337.30
CENTRAL MARIN SANITATION AGENCY	Service Charges - third quarter service charge for 1/01/24-3/31/24	400	4112 · Sewage treatment	1,489,306.19
CENTRAL MARIN SANITATION AGENCY	Service Charges - CMSA debt service charge and coverage fee	400	4112 · Sewage treatment	296,863.89
CITY OF SAN RAFAEL	Contract with San Rafael - second quarter FY 2023-24 reimbursement	100	2361 · Contract with San Rafael	867,060.39
CITY OF SAN RAFAEL	Vehicles - diesel and unleaded fuel for 10/1/23-12/31/23	200	2083 · Parts and repairs vehicles	9,716.75
CITY OF SAN RAFAEL	Vehicles - vehicle repairs from 10/31/23-12/31/23	200	2083 · Parts and repairs vehicles	6,181.27
COLIN, KATE	Director's Fees - Kate Colin on 12/15/23	100	2282 · Director's fees	100.00
COLIN, KATE	Director's Fees - Kate Colin on 1/19/24	100	2282 · Director's fees	100.00
COUNTY OF MARIN	Director's Fees - Katie Rice on 1/19/24	100	2282 · Director's fees	100.00
CSW/STUBER-STROEH ENGR GROUP INC.	Miramar and Miraflores - professional services through 12/03/23	300	4306 · Miramar and Miraflores (80)	2,232.50
EAST BAY TIRE CO.	Vehicles - generator tire replacement	200	2083 · Parts and repairs vehicles	176.91
EVOQUA WATER TECHNOLOGIES, LLC	Odor Control - odor control quarterly services from 12/01/23-12/31/23	200	2106 · Odor control chemicals	2,033.14
EWERS ENGINEERING INC	Isolation Valve Replacement Project - engineering services from 12/01/23-12/31/23	300	4345 · Isolation Valve Replacement (10	4,826.00
GRAINGER	Pump Stations - replacement and spare timer relay NF generator	200	2359 · Maint- pump sta's & force mains	202.03
HARDIMAN CONSTRUCTION, INC	Sewer Pipeburst - Progress Payment #1	300	4355 · 2023 Sewer Pipeburst (80)	604,176.25
JACKSON'S HARDWARE	Pump Stations - generator parallel kit	200	2359 · Maint- pump sta's & force mains	152.94
JACKSON'S HARDWARE	Pump Stations - personal washer rental for graffiti removal	200	2359 · Maint- pump sta's & force mains	59.30
JACKSON'S HARDWARE	Pump Stations - bulbs for generator North Francisco Pump Station	200	2359 · Maint- pump sta's & force mains	43.68
JACKSON'S HARDWARE	Pump Stations - foam tape	200	2359 · Maint- pump sta's & force mains	16.56
JACKSON'S HARDWARE	Pump Stations - North Francisco Motor Deck Lighting	200	2359 · Maint- pump sta's & force mains	114.69
JACKSON S HARDWARE	i ump stations - Notth Flaticisco Notor Deck Lighting	200	2009 · Iviainit- pump sta's α force mains	114.09

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JACKSON'S HARDWARE	Pump Stations - check valve springs	200	2359 · Maint- pump sta's & force mains	30.31
JACKSON'S HARDWARE	Pump Stations - adhesive removal solvent	200	2359 · Maint- pump sta's & force mains	12.01
JACKSON'S HARDWARE	Pump Stations - weather-stripping	200	2359 · Maint- pump sta's & force mains	56.70
KIMLEY-HORN AND ASSOCIATES, INC.	2023 Sewer Improvements - various locations - for engineering services rendered through 11/30/23	300	4356 · Sewer Improv-mult Locations80	11,952.50
KIMLEY-HORN AND ASSOCIATES, INC.	2023 Sewer Improvements - various locations - for engineering services rendered through 12/31/23	300	4356 · Sewer Improv-mult Locations80	5,947.01
MAHER ACCOUNTANCY	Accounting Services - January 2024	100	2717 · Accounting services	4,100.00
MARIBETH BUSHEY	Director's Fees - Maribeth Bushey on 12/15/23	100	2282 · Director's fees	100.00
MARIBETH BUSHEY	Director's Fees - Maribeth Bushey on 1/19/24	100	2282 · Director's fees	100.00
MARIN COUNTY TAX COLLECTOR	Office Supplies - radio diagnostic and repair	100	2133 · Office & shop supplies	1,089.93
MARIN MUNICIPAL WATER DIS	Water - 1271 Andersen Drive from 10/12/23-12/11/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Andersen Drive from 10/12/23-12/11/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Simms St from 10/12/23-12/11/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Woodland Avenue from 10/12/23-12/11/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Castro Avenue from 10/17/23-12/13/23	200	2536 · Water utility costs	197.18
MARIN MUNICIPAL WATER DIS	Water - E Francisco Boulevard from 10/17/23-12/13/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Catalina BI from 10/17/23-12/13/23	200	2536 · Water utility costs	97.60
MARIN MUNICIPAL WATER DIS	Water - Montecito Road from 10/18/23-12/14/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Point San Pedro Road from 10/18/23-12/14/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - E Francisco Boulevard from 10/18/23-12/14/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - 3106 Kerner Boulevard from 10/18/23-12/14/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - North San Pedro from 10/19/23-12/15/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Peacock Drive from 10/19/23-12/15/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - 44 Lagoon Road from 10/19/23-12/15/23	200	2536 · Water utility costs	79.54
MARIN MUNICIPAL WATER DIS	Water - Riviera Drive LT28 Sewer Pump from 10/19/23-12/15/23	200	2536 · Water utility costs	79.54
MILLER PACIFIC ENGINEERING GROUP INC	Bret Harte Easement Wall Improvement - services from 8/27/23-10/15/23	300	4327 · Bret Harte Esmt Wall Improv(80)	7,927.00
MILLER PACIFIC ENGINEERING GROUP INC	2020 Sewer Pipe Repair and Replacement Project - geotechnical services and testing from 9/25/23-10/29/23	300	4342 · 2020-21 Sewer Improvement (80)	8,113.30
MILLER PACIFIC ENGINEERING GROUP INC	2020 Sewer Pipe Repair and Replacement Project - geotechnical services and testing from 10/30/23-11/26/23	300	4342 · 2020-21 Sewer Improvement (80)	6,073.40
MUNICIPAL RESOURCE GROUP, LLC	Staff Training - ESL coaching through 11/30/23	100	2388 · Training and education	225.00
MUNICIPAL RESOURCE GROUP, LLC	Staff Training - ESL coaching through 1/17/24	100	2388 · Training and education	450.00
NUTE ENGINEERING INC	N. Francisco Pump Station - engineering services from 12/01/23-12/31/23	100	4155 · N. Francisco/WRR Pump St (10)	2,182.00
NUTE ENGINEERING INC	Bayside Acres Beach Sewer Improvements Project - engineering services from 12/01/23-12/31/23	300	4338 · Rehab Beach Swr Baysid PhABC-80	32,530.50
PACE SUPPLY	Pump Stations - 260 kw doosan containment draw plug	200	2359 · Maint- pump sta's & force mains	49.68
PARK ENGINEERING, INC	2020 Sewer Pipe Repair and Replacement Project - inspection services June and July 2023	300	4342 · 2020-21 Sewer Improvement (80)	46,714.88
PARK ENGINEERING, INC	Consulting Services - Permit Inspection Services	100	2325 · Consulting services	4,294.30
PARK ENGINEERING, INC	Consulting Services - Permit Inspection Services	100	2325 · Consulting services	2,791.82
PARK ENGINEERING, INC	2020 Sewer Pipe Repair and Replacement Project - inspection services December 2023	300	4342 · 2020-21 Sewer Improvement (80)	16,336.36
PARK ENGINEERING, INC	Sewer PipeBurst - 2022 sewer pipe burst project - inspection services	300	4355 · 2023 Sewer Pipeburst (80)	1,105.68
PG&E a/c 2480926202-5	Power - electric service for pump stations from 11/14/23-12/14/23	200	2535 · Electric utility costs	21,158.54
PG&E a/c 2480926202-5	Power - electric service for pump stations from 12/15/23-1/16/24	200	2535 · Electric utility costs	31,950.10
SCHAAF & WHEELER, INC	2020 Sewer Repair Project - professional engineering services through 12/31/23	300	4342 · 2020-21 Sewer Improvement (80)	717.50
SCHAAF & WHEELER, INC	2023 Sewer Pipe Repair and Replacement Project - professional engineering services through 12/31/23	300	4351 · 2023 Sewer Rehabilitation (80)	59,781.43
SHAMROCK	Pump Stations - landscape for Glenwood Pump Station	200	2359 · Maint- pump sta's & force mains	133.53
STATE WATER RESOURCES CONTROL BOARD	2020 Sewer Repair Project - SWRCB annual permit fee from 10/01/23-9/30/24	300	4342 · 2020-21 Sewer Improvement (80)	652.00
TIFCO INDUSTRIES	Pump Station - pump parts and zip ties	200	2359 · Maint- pump sta's & force mains	224.13
VERIZON WIRELESS(242395655)	Telephone Service - private IP addresses for the San Pedro and Peacock Pump Stations from 12/18/23-1/17/24	100	2534 · Telephone service	131.83
VERIZON WIRELESS (372347623)	Telephone Service - wireless service for laptops from 11/21/23-12/20/23	100	2534 · Telephone service	312.08
VERIZON WIRELESS(372347623)  VERIZON WIRELESS(372347623)	Telephone Service - wireless service for laptops from 12/21/23-1/20/24	100	2534 · Telephone service	477.59
72.112311 FFITCELOO(012041023)	1 010pm 010 0011100 - WITO1000 0011100 101 10ptopo 110111 12/2 1/20* 1/20/2*	100	2001 Totophone Solvice	411.39

W. R. FORDE ASSOCIATES (INC)	Isolation Valve Replacement Project - progress payment #1	300 4345 · Isolation Valve Replacement (10 145,546
W. R. FORDE ASSOCIATES (INC)	Isolation Valve Replacement Project - progress payment #2	300 4345 · Isolation Valve Replacement (10 <b>11,40</b> 0
W. R. FORDE ASSOCIATES (INC)	Sewer Pipe Repair and Replacement Project - Phase 2, progress payment #10	300 4342 · 2020-21 Sewer Improvement (80) <b>302,93</b>
WATER COMPONENTS & BLDG SUPPLY	Collection System - screw cap for pipe	200 2360 · O&M - collection systems
WATER COMPONENTS & BLDG SUPPLY	Collection System - replacement hydrant wrench	200 2360 · O&M - collection systems 36
WECO INDUSTRIES LLC	Collection System - leaders for power rodder	200 2360 · O&M - collection systems 2,000
WOODLAND CTR AUTO SUPPLY	Pump Stations - battery for generator at San Pedro Pump Station	200 2359 · Maint- pump sta's & force mains 18
WOODLAND CTR AUTO SUPPLY	Pump Stations - pump truck parts	200 2359 · Maint- pump sta's & force mains 23
WOODLAND CTR AUTO SUPPLY	Pump Stations - pump truck parts	200 2359 · Maint- pump sta's & force mains
WOODLAND CTR AUTO SUPPLY	Pump Stations - portable generator plug and tools	200 2359 · Maint- pump sta's & force mains 4
WOODLAND CTR AUTO SUPPLY	Pump Stations - silicone caulk	200 2359 · Maint- pump sta's & force mains
		4,238,206



# San Rafael Sanitation District

111 Morphew St San Rafael, CA 94901

Telephone 415 454-4001 Facsimile 415 454-2270 **Board of Directors** 

Kate Collin, Chair Maribeth Bushey, Secretary/Director Katie Rice, Director

**District Manager/District Engineer** Doris Toy, P.E.

February 1, 2024

Ms. Kerry O'Connor San Francisco Bay Regional Water Quality Control Board 1515 Clay Street, Suite 1400 Oakland, CA 94612

Re: Order No. R2-2023-0006, NPDES Permit CA0038628 for Central Marin Sanitation Agency, San Rafael Sanitation District, Ross Valley Sanitary District, and Sanitary District No. 2 of Marin County Annual Progress Report

Dear Ms. O'Connor:

In reference to Order No. R2-2023-0006, the attached table is the San Rafael Sanitation District's annual report documenting the progress or completion of Tasks 1 through 5, as stated in Table 3, "Collection System Agency Tasks to Reduce Blending."

If you have any questions, please give me a call at (415) 485-3484 or send me an email at Doris. Toy@cityofsanrafael.org.

Sincerely,

**Doris Toy** 

District Manager/District Engineer

/DT

Central Marin Sanitation Agency Order No. R2-2023-0006, NPDES Permit CA0038628 Special Provisions, Section 6.3.5.1

# San Rafael Sanitation District - Tasks to Reduce Blending Compliance Update, Feb 1, 2024

**Table 3. Collection System Agency Tasks to Reduce Blending** 

	Table 5. Confection System Agency Tasks to	Status/Comment
1.	Construct Sewer Pipe Repair & Replacement. San Rafael Sanitation District shall repair and replace 1.5 miles of sewer main and lower laterals each calendar year. Compliance Date: Annually, with Annual Self-Monitoring Report due February 1 each year.	COMPLETE for 2023
	Capital Improvement Projects for 2023:	
	a. 2020 Sewer Pipe Repair and Replacement, Ph 2	Replaced 12,320 LF (2.3mile) of sewer main and 3,420 LF of lateral
	b. Third St Sewer Replacement (under the City of San Rafael Third St Rehab Project)	Replaced 2,397 LF (0.5mile) of sewer main and 430 LF of lateral
	c. 2023 Sewer Pipe Burst	Replaced 2,553 LF (0.5mile) of sewer main and 600 LF of lateral
2.	Propose Lateral Ordinances. San Rafael Sanitation District shall review the ordinances of Bay Area communities that have successfully adopted measures requiring inspection of private sewer laterals (e.g. upon ownership change), shall develop a lateral inspection ordinance appropriate for its service area and present it to its governing board for consideration, and shall notify the Regional Water Board at least 30 days prior to presenting proposal. Compliance Date: June 30, 2024	District has updated and collected information from other Bay Area sewer agencies regarding their lateral ordinances. Staff is drafting ordinance.
3.	Implement Lateral Ordinance. When adopted, San Rafael Sanitation District shall facilitate replacement of private laterals through implementation of its private sewer lateral ordinance. Compliance Date: Annually, with Annual Self-Monitoring Report due February 1 each year.	Once adopted, SRSD will report.
	a. Lateral Repair/Replacement by Property Owners based on sewer permit applications in 2023.	Replaced 3,200 LF (0.6 mile) of lateral
4.	Submit Annual Progress Report.  San Rafael Sanitation District shall submit an annual report documenting the progress on completion of Tasks 1, 2, and 3.  Compliance Date: Annually, with Annual Self-Monitoring Report due February 1 each year.	See above.
5.	Identify Feasible Actions for Next Permit Term.  San Rafael Sanitation District shall submit a report identifying feasible actions it can do to reduce inflow and infiltration during the next permit term. CMSA should include such information in its Utility Analysis if it seeks to continue bypassing peak wet weather flows around biological treatment units.  Compliance Date: June 1, 2027	Will submit by June 1, 2027