The Honorable Nancy Pelosi  
The Speaker of the House of Representatives  
1236 Longworth H.O.B.  
Washington, DC 20515

SUBJECT: Water Resources Development Act Request - Enhanced Nutrient Removal Requirements

Dear Speaker Pelosi:

The San Francisco International Airport (SFO) requests consideration of the Reconstruction of the Mel Leong Treatment Plant (MLTP) sanitary plant to optimize the current treatment tanks through the Enhanced Nutrient Removal Requirements project as part of the Water Resources Development Act (WRDA) authorization process.

In response to new regulatory requirements and capacity constraints, this project would convert SFO's MLTP Sanitary Sequence Batch Reactors (SBR) to Aerobic Granular Sludge (AGS) units. Modifications would optimize the current footprint, while efficiently reducing ammonia and nutrient load and capacity constraints at MLTP. These upgrades would also include process equipment such as pumps, aeration blowers, decanters, and flow control valves.

Local/Regional Significance
The San Francisco Bay Regional Water Quality Control Board (RWQCB) issued Order No. R2-2019-0017 in anticipation of increased future regulation of nutrient discharges to the San Francisco Bay (the Bay). The Order requires sampling of nutrients and encourages early planning to reduce nutrient loads. This Order will expire in 2024, at which time the RWQCB will impose stringent nutrient limits for dischargers. Municipal wastewater treatment plants are a significant source of nutrients to the Bay and pose a potential threat to beneficial uses of the Bay.

This project would allow SFO to satisfy anticipated future permit limits for nutrient loads. The RWQCB plans to impose these limits pursuant to the Clean Water Act section 402 and implementing regulations, to limit point source municipal discharges of nutrients to surface waters, in furtherance of the objective of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters.

SFO and other publicly owned treatment facilities are a significant source of nutrients released into the Bay which could threaten the beneficial use of the Bay. This project would implement measures to effectively detect, prevent, treat, and eliminate harmful algal blooms associated with the release of nutrients that the Secretary of the Army was to evaluate in reference to Section 128 of WRDA 2020. This project will allow SFO to satisfy future permit limits for nutrient load discharge.
In the year preceding the pandemic, SFO served over 57 million passengers, generating more than 48,000 direct jobs and $10.7 billion in business activity. Growth models show that SFO’s annual passenger demand will reach over 71 million, creating more jobs and more business activity. To accommodate additional passengers, the MTLP’s nutrient removal capacity will need to increase. This project’s conversion of SBRs to AGS will help achieve the increased capacity requirements.

SFO will provide the required local match for this project. Thank you for your consideration of this critical project and your continued support of SFO.

Very truly yours,

Ivar C. Satero
Airport Director