

**PROPOSED ORDER NO. R3-2021-0001
COMMENTS AND STAFF RESPONSES**

During the public comment period, the Central Coast Water Board received one set of comments from the City of El Paso de Robles (Discharger). Responses to these comments are provided below. All comments are direct transcriptions from the City’s comment letter. Transcriptions do not include the entire content of the comment letter as some content is non-substantive (e.g., salutations, contact information).¹

City of El Paso de Robles – Comment 1

Section 4.1.2.1: These are new effluent limits for the new discharge locations to Huerhuero Creek. These are based on limits the City historically had for its wastewater discharge to the Salinas River. For Total Chlorine Residual, the reason the City has an effluent limit for the discharge to the Salinas River is because historically the City used chlorine for disinfection of all wastewater. However, in 2019, the City completed a \$14.4 million addition of tertiary treatment facilities, which includes ultraviolet light (UV) disinfection. The City has been using the UV disinfection system continuously for all wastewater flow since the system was commissioned in May 2019. For the recycled water pipeline that will be used to deliver the water to the alternate discharge locations to Huerhuero Creek, Title 22 recycled water requirements dictate that only UV-disinfected water may be put into the pipeline. What this means is that discharges to Huerhuero Creek will have much less potential to contain chlorine than the City’s historic discharge to the Salinas River. Furthermore, the City will be managing the discharges to Huerhuero Creek so that it does not create a “live stream” condition (i.e., all the flow will rapidly percolate into the sandy alluvium). The City will not discharge any water when surface flow is naturally present in the creek, so there is very little or no potential for any chlorine that might be present in the water to affect sensitive aquatic life.

For these reasons, the City requests removal of the effluent limit for Total Chlorine Residual from this section. This minor change will greatly improve the City’s ability to maximize the discharge to Huerhuero Creek, which is more beneficial for the Paso Robles Groundwater Basin than the existing discharge to the Salinas River. If you remove this limit, the City will remain committed to: 1) dechlorinate all water discharged to Huerhuero Creek, and 2) continuously monitor Total Chlorine Residual in the discharge as specified in the Monitoring and Reporting Program.

Staff Response to Comment City of El Paso de Robles – Comment 1
--

The proposed order has been revised to remove the total chlorine residual effluent limitation for the new Huerhuero Creek discharge points (002A and 002B). The

¹ Contact Central Coast Water Board staff to request copies of the entire comment letters and letter attachments.

Discharger has upgraded to UV disinfection and discontinued the regular use of chlorine as the primary means of disinfection, addressing previous compliance issues related to chlorination and dechlorination processes. Section 2.5 of the Fact Sheet describes the Discharger's plans to chlorinate flows in the recycled water pipeline, to maintain a chlorine residual to prevent regrowth of bacteria within the conveyance system, and to dechlorinate the treated wastewater prior to discharge to Huerhuero Creek. This chlorination process involves significantly less volume and concentration relative to the Discharger's historical use of chlorine as the main disinfection process at the Facility. Therefore, it is reasonable to not to apply the total chlorine residual effluent limitation for the Salinas River discharges to the new Huerhuero Creek discharges. Additionally, as noted by the commenter, section 4.1.1, *Table E-3. Effluent Monitoring* of Attachment E requires the Discharger to monitor for total chlorine residual downstream of the dechlorination station at the Barney Schwartz Sports Park prior to discharging to Huerhuero Creek.

Change made: Revisions to section 4.1.2.1, *Table 3. Final Effluent Limitations at Discharge Points 002A and 002B* of the proposed order and section 4.3.6.1 *Total Chlorine Residual* of Attachment F.

City of El Paso de Robles – Comment 2

Section 3.1.1 of MRP: For influent Total Dissolved Solids monitoring, please change the sample type from grab to 24-hour composite. This will result in a sample that is more representative of influent throughout the day and will be consistent with effluent monitoring.

Staff Response to Comment City of El Paso de Robles – 2

The proposed order has been revised to require 24-hour composite sampling, instead of grab sampling, for influent total dissolved solids monitoring.

Change Made: Revision to section 3.1.1, *Table E-2. Influent Monitoring* of Attachment E.

City of El Paso de Robles – Comment 3

Section 4.1.1 of MRP: For pathogen monitoring, the existing permit requires effluent be sampled twice per week, but the proposed permit requires *E. coli* to be sampled five times per week, with no explanation in the Fact Sheet for the increased monitoring frequency. This leads me to believe this may be a mistake. I respectfully request the effluent *E. coli* monitoring frequency be changed to twice per week, consistent with the current permit. The upgraded WWTP has a much higher performance disinfection process than the old plant; twice per week monitoring should be more than adequate to monitor disinfection performance.

Staff Response to Comment City of El Paso de Robles – 3

The proposed order has been revised to require *E. coli* effluent monitoring twice per week instead of five times per week. The proposed Order has also been updated to clarify *E. coli* effluent monitoring also applies to monitoring location EFF-002. It is necessary for the Discharger to monitor for *E. coli* at monitoring location EFF-002 to evaluate compliance with *E. coli* effluent limitations for Discharge Points 002A and 002B.

Change Made: Revision to section 4.1.1, *Table E-3. Effluent Monitoring – Monitoring Locations EFF-001B, EFF-001C, and EFF-002* of Attachment E.

City of El Paso de Robles – Comment 4

Section 7.1.1 of MRP: For pH, please reduce the minimum sampling frequency from once per day to five times per week. This slight reduction in frequency will enable the City to operate its laboratory much more efficiently, but will still provide a wealth of pH data.

Staff Response to Comment City of El Paso de Robles – 4

The proposed order has been revised to require pH recycled water monitoring five times per week instead of once per day.

Change Made: Revision to section 7.1.1, *Table E-6. Recycled Water Monitoring Requirements* of Attachment E.

City of El Paso de Robles – Comment 5

Section 2.1 of Fact Sheet: This section accurately describes the Paso Robles WWTP, however, refinements to the paragraph about biosolids and biogas are needed for accuracy. Please revise that paragraph to note that dewatered biosolids are staged in both a concrete-lined drying bed and some self-contained earthen beds prior to disposal/reuse. Also, please note that when biogas cannot be used beneficially to generate electrical power and heat, the facility has a newly upgraded flare to burn off the biogas, thus preventing a dangerous condition of over-pressurizing the anaerobic digesters. The flare is permitted and monitored by the San Luis Obispo County Air Pollution Control District.

Staff Response to Comment City of El Paso de Robles – 5

The proposed order has been revised to include the commenter's suggested revisions to the biosolids and biogas descriptions in the Fact Sheet (Attachment F).

Change Made: Revision to section 2.1, *Description of Wastewater and Biosolids Treatment and Controls* of Attachment F.

City of El Paso de Robles – Comment 6

Section 3.3.5 of Fact Sheet: This section refers to a water quality plan for enclosed bays and estuaries. This plan is not applicable to this discharge to the Salinas River, an inland surface water body. This should be corrected.

Staff Response to Comment City of El Paso de Robles – 6
The proposed order has been revised pursuant to the commenter’s suggestion.
Change Made: Revision to section 3.3.5, <i>National Toxics Rule (NTR) and California Toxics Rule (CTR)</i> of Attachment F.

City of El Paso de Robles – Comment 7

Section 3.5.1 of Fact Sheet: Please note the City will submit a Notice of Non-Applicability (NONA) for the General NPDES Permit for Industrial Stormwater per previous direction from with Water Board stormwater staff prior to the April Water Board hearing. The site of the Paso Robles WWTP is designed to capture and infiltrate all stormwater runoff into the ground prior to reaching the Salinas River. I will provide further details in the NONA.

Staff Response to Comment City of El Paso de Robles – 7
On February 8, 2021, the Discharger submitted a Notice of Non-Applicability (NONA) for the Statewide General NPDES Permit, Waste Discharge Requirements for Stormwater Associated with Industrial Activities Excluding Construction Activities (State Water Board Order No. 2014-0057-DWQ, NPDES General Permit No. CAS000001) claiming the Facility has little to no potential to discharge industrial stormwater to surface waters. The Central Coast Water Board stormwater staff are reviewing the NONA request and determining the applicability of State Water Board Order No. 2014-0057-DWQ, NPDES General Permit No. CAS000001 for the Facility.
Change Made: None.

City of El Paso de Robles – Comment 8

Section 6.2.5.2 of Fact Sheet: In the second paragraph of this section, it would be appropriate to provide this context: the existing NPDES permit has very limited requirements for a pretreatment program; the City has conducted a voluntary pretreatment program for many years; the City was not informed by U.S. EPA there were any problems with the program; and the City has been permitting Categorical Industrial Users. To correct this, I recommend adding the following to the beginning of this paragraph: "To determine if the City should be mandated to develop a formal

Pretreatment program, a U.S. EPA subcontractor conducted a pretreatment compliance inspection of the City's voluntary program on... "

Also, later in this section it states the City is updating its program to address feedback from pretreatment compliance inspections conducted in 2017 and 2019. Please clarify this to note the City previously addressed the comments from the July 2017 inspection and submitted a revised program to the Water Board. The City did not receive any written feedback from the 2019 inspection until late December 2020. The City is presently revising the pretreatment program again to address the feedback it received in December 2020.

Staff Response to Comment City of El Paso de Robles – 8
The proposed order has been revised to provide further clarification regarding the U.S. EPA subcontractors' pretreatment compliance inspections and reviews.
Change Made: Revisions to section 6.2.5.2, <i>Pretreatment</i> of Attachment F.