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## Central Coast Regional Water Quality Control Board

April 17, 2023

Matt Thompson  
Wastewater Manager  
City of Paso Robles  
1000 Spring Street  
Paso Robles, CA 93446  
Email: [MThompson@prcity.com](mailto:MThompson@prcity.com)

**via electronic mail only**

Dear Matt Thompson:

**NOTICE OF APPROVAL — PRETREATMENT PROGRAM FOR THE PASO ROBLES  
WASTEWATER TREATMENT PLANT, ORDER NO. R3-2021-0001, NPDES NO.  
CA0047953 (SAN LUIS OBISPO COUNTY)**

On October 14, 2021, the city of Paso Robles submitted a proposed pretreatment program and request for program approval to the Central Coast Regional Quality Control Board (Central Coast Water Board). The purpose of the pretreatment program is to implement national pretreatment standards to control pollutants that could pass through or interfere with treatment processes at publicly owned treatment works (POTW) or that may contaminate sewage sludge. The city's program documents were reviewed by the State Water Resources Control Board (State Water Board), in coordination with Central Coast Water Board staff, and found to be consistent with U.S. EPA pretreatment program requirements in 40 C.F.R. 403.

### **BACKGROUND**

Section 307(b) of the CWA and federal regulations at 40 C.F.R. part 403 require POTWs with a total design flow greater than 5 MGD and receiving pollutants that could pass through or interfere with the operation of the POTW to develop and implement an acceptable industrial pretreatment program. A pretreatment program is required to prevent the introduction of pollutants that will interfere with treatment plant operations or sludge disposal and prevent pass through of pollutants that exceed water quality objectives, standards, or permit limitations.

Under California Code of Regulations title 23, section 2233(a), the Central Coast Water Board may include a permit condition requiring a local pretreatment program for a publicly owned treatment works treating or designed to treat an average dry weather flow of less than 5 MGD of community wastewater where deemed appropriate. The Central Coast Water Board transmitted a letter on November 22, 2013 requiring the city to develop a formal program for industrial discharges that meets federal and state

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JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

pretreatment regulations based on nature of the industrial users and the results of the June 2013 U.S. EPA subcontractor-conducted pretreatment compliance inspection discussed below.

In June of 2013, a U.S. EPA subcontractor conducted a pretreatment compliance inspection of the city's voluntary pretreatment program—which has been in place since 2007—to determine if the city should be mandated to develop a formal pretreatment program. The U.S. EPA subcontractor found that the city's sewer use ordinance meets the requirements of 40 C.F.R. part 403, yet did not provide the city the authority to require that industrial users notify the city in the event of an accidental discharge or bypass in violation of the Sewer Use Ordinance (SUO), immediately halt any actual or threatened discharge which reasonably appears to present or cause an imminent or substantial endangerment to the health or welfare of persons, or implement its established response plan. The U.S. EPA subcontractor and the Central Coast Water Board also determined that the established response plan and sewer use ordinance contain inconsistent enforcement action requirements and do not contain all the elements required by 40 C.F.R. section 403.8(f)(5). On November 22, 2016, the Central Coast Water Board transmitted a letter requiring the city to develop a formal program for industrial discharges to the city's facility that meets federal and state pretreatment program requirements.

The city submitted a formal pretreatment program to the Central Coast Water Board in October 2018. In June 2019, a U.S. EPA subcontractor conducted a follow-up review of files and documents related to the city's October 2018 submittal. On October 14, 2021, the city submitted a revised program to address comments from the June 2019 pretreatment compliance inspection report (delivered to the city in December 2020) and conform to the city's new NPDES permit that became effective on July 2, 2021. This revision includes updates to the SUO and industrial user permits.

The State Water Board Division of Water Quality, Pretreatment Unit, in coordination with the Central Coast Water Board, reviewed the October 2021 submittal and requested that the city further evaluate and justify whether a local limit was needed for bis(2-ethylhexyl)phthalate and requested the city review the equations used to calculate the removal efficiencies and allowable headworks loadings (AHLs) for biosolids. On June 6, 2022, the city submitted a technical memo to the Central Coast Water Board with additional review related to bis(2-ethylhexyl)phthalate and AHLs for biosolids. Upon review of the June 6, 2022 technical memorandum, Central Coast Water Board determined that the city's pretreatment program met the requirements of 40 C.F.R. part 403.

## **PUBLIC NOTICE**

On December 20, 2022, the Central Coast Water Board posted a 30-day public notice in the San Luis Obispo Tribune regarding the city's request for approval of its pretreatment program. The Central Coast Water Board also transmitted notices of the request for pretreatment program approval to interested persons as required under

40 C.F.R. § 403.11(b)(1)(i)(A). No written comments were received during the 30-day comment period that ended on January 20, 2023.

## DETERMINATION

The Central Coast Water Board hereby approves the city's pretreatment program. The pretreatment program shall be an enforceable condition of the city's NPDES Permit No. CA0047953 (currently Order No. R3-2021-0001) as of the date of this approval letter and final approval of the city council (see 40 C.F.R. §122.63(g)).

Enclosed please find a copy of the public notice regarding the approval of the pretreatment program for the city of Paso Robles WWTP. This notice and more information regarding the city of Paso Robles pretreatment program is available on the Central Coast Water Board's website for review at [https://www.waterboards.ca.gov/centralcoast/public\\_notices/public\\_notices.html](https://www.waterboards.ca.gov/centralcoast/public_notices/public_notices.html).

If you have any questions regarding this matter, please contact Central Coast Water Board staff Leah Lemoine at (805) 549-3159 or [leah.lemoine@waterboards.ca.gov](mailto:leah.lemoine@waterboards.ca.gov). Sincerely,

*for* Matthew T. Keeling  
Executive Officer

### Attachment 1: Public Notice Paso Robles Pretreatment

cc:

Matt Thompson, city of Paso Robles, [MThompson@prcity.com](mailto:MThompson@prcity.com)

Casey Shepherd, city of Paso Robles, [CShepherd@prcity.com](mailto:CShepherd@prcity.com)

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