

**STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF JANUARY 31 - FEBRUARY 1, 2019**

Prepared on December 26, 2018

**ITEM NUMBER:** 7

**SUBJECT:** Revision of Waste Discharge Requirements and Reissuance of National Pollutant Discharge Elimination System Permit No. CA0048003 for South San Luis Obispo County Sanitation District Wastewater Treatment Facility, San Luis Obispo County, Order No. R3-2019-0002

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**KEY INFORMATION**

Location: 1600 Aloha Place, Oceano, CA 93445  
Place ID: 257887  
Type of Discharge: Disinfected secondary-treated municipal wastewater  
Permitted Flow: 5.0 million gallons per day (MGD)  
Type of Treatment: Primary sedimentation, biofiltration, secondary sedimentation, chlorine disinfection, dechlorination  
Disposal Method: Discharge to Pacific Ocean  
Solid Wastes: Digested sludge hauled offsite  
Existing Orders: Waste Discharge Requirements Order No. R3-2009-0046 and General Waste Discharge Requirements for Sanitary Sewer Systems (State Water Board Order No. 2006-003-DWQ).

**This Action:** Adopt Order No. R3-2019-0002

**SUMMARY**

This agenda item considers the reissuance of an existing National Pollutant Discharge Elimination System (NPDES) permit. The Fact Sheet, Attachment F of the proposed Order, includes the legal requirements and technical rationale that serve as the basis for the requirements of the permit. Central Coast Water Board staff recommends adoption of the proposed Order.

**DISCUSSION**

The South San Luis Obispo County Sanitation District (hereinafter Discharger) is the sole owner of the South San Luis Obispo County Sanitation District Wastewater Treatment Facility (hereinafter Facility), providing wastewater treatment for the cities of Arroyo Grande and Grover Beach, as well as the Oceano Community Services District. The cities of Arroyo Grande and Grover Beach and the Oceano Community Services District retain ownership and direct

responsibility for wastewater collection and transport systems up to the point of discharge into interceptors owned and operated by the Discharger.

The Facility treats municipal wastewater through primary and secondary treatment processes, followed by disinfection. Initially the wastewater is screened mechanically and then goes through primary clarifiers. Secondary treatment is achieved via a single fixed-film reactor followed by secondary clarification. Prior to disposal via outfall, the treated wastewater is chlorinated and dechlorinated in a chlorine-contact basin.

The wastewater treatment plant accepts hauled loads of brines, which are introduced to the plant outfall following dechlorination. Sludge and biosolids are anaerobically digested, dewatered via a centrifuge and/or drying beds, and hauled offsite to a composting facility.

### **Changes from the Existing Order**

The proposed Order is structured in accordance with the statewide NPDES permit template and contains minor changes consistent with the template structuring and presentation. Regarding substantive changes, the proposed Order contains the following:

1. Removal of effluent limitations for copper, lead, nickel, and zinc because the reasonable potential analysis resulted in an Endpoint 2 conclusion: no reasonable potential for exceedances. This removal of Endpoint 2 parameters is consistent with the anti-backsliding provisions (Page F-26, Fact Sheet Section IV.D.1).
2. Clarification of the requirement to notify the Central Coast Water Board within 14 days of receipt of failed toxicity tests (Page 14, Order Section VI.C.2.b).
3. Addition of a requirement for preparation and submittal of an updated copy of the Toxicity Reduction Evaluation Workplan, as well as clarification of the section requiring accelerated toxicity testing if the toxicity trigger is exceeded (Page 15, Order Section VI.C.2.c and VI.C.2.d).
4. Addition of water contact resampling requirements in the event that single-sample maximum standards are exceeded, consistent with the California Ocean Plan (Page 16, Order Section VI.C.2.e).
5. A climate change adaptation special provision was added to address flooding and sea-level rise associated with climate change (Page 18, Order Section VI.C.6). The provision also includes a requirement to evaluate wastewater recycling as part of a requirement to conduct a facility Life Expectancy Analysis. The Central Coast Water Board is addressing the threat of climate change, sea-level rise, and flooding by including provisions in new orders that ensure mitigation and adaptation strategies are implemented. In the case of this Order, the Discharger is located in an area that is increasingly susceptible to sea-level rise and flooding hazards. Flooding may cause a discharge of wastewater similar to the discharge that occurred in 2010 when floodwaters entered an electrical conduit leading to pump motor control circuitry and caused the Discharger's influent pumps to fail. Failure of the influent pumps resulted in a 1,139,825-gallon sanitary sewer overflow that was discharged into waters of the United States including Meadow Creek, Oceano Lagoon, and the Pacific Ocean. To address the threat of flood and sea-level rise, this Order requires the submission of reports and planning

documents consistent with the requirements of Coastal Development Permit No. 3-16-0233. This provision was added after the public comment period.

6. Addition of requirements for the development and submittal of an updated Brine Monitoring Plan to evaluate the compliance of mixed effluent-brine discharge with effluent limitations (Page E-15, MRP Section IX.D.2).
7. Addition of requirements to attach brine logs and report brine sampling at the same time as corresponding monthly effluent sampling reports (Page E-15, MRP Section IX.D.3).

### **Compliance History**

The Discharger has violated numeric effluent limitations during the previous order. The majority of the violations involve disinfection and total suspended solids limitations. The Discharger is actively pursuing a redundancy project so that it will be able to service its secondary treatment process. By adding redundant secondary treatment process units to the treatment process, the Discharger will be better able to control biological sloughing from the bioreactors and therefore reduce disinfection and total suspended solids violations. The Discharger obtained a conditionally approved Coastal Development Permit for the redundancy project in May 2017.

In 2010, the Discharger spilled over a million gallons of untreated wastewater to local surface water and the ocean. The Discharger paid a significant penalty and has made improvements to the plant.

### **COMMENTS**

The Central Coast Water Board notified the Discharger and interested parties of its intent to issue waste discharge requirements for the discharge and provided interested parties an opportunity to submit written comments and recommendations. Notification was provided by publication in the local newspaper, as well as posting on the Central Coast Water Board's and Discharger's websites. The written comments were due at the Central Coast Water Board office by 5:00 p.m. on November 30, 2018. Comments were received from the Surfrider Foundation and the Culligan San Paso Company. Central Coast Water Board staff response to comments is provided in the proposed Order's Fact Sheet (Attachment F, pages F-38 to F-39). Although the Climate Change Adaptation special provision was added after the public comment period, the requirements and associated due dates are consistent with the Coastal Development Permit as noted above.

### **RECOMMENDATION**

Adopt Order No. R3-2019-0002, as proposed.

### **ATTACHMENTS**

For copies, please refer to the Central Coast Water Board's internet website:

[https://www.waterboards.ca.gov/centralcoast/board\\_info/agendas/2019/2019\\_agendas.html](https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2019/2019_agendas.html)

1. Proposed Order No. R3-2019-0002, including the following associated attachments:
  - Attachment A – Definitions
  - Attachment B – Map

Attachment C – Flow Schematic  
Attachment D – Standard Provisions  
Attachment E – Monitoring and Reporting Program (MRP)  
Attachment F – Fact Sheet

2. Comment letter from Surfrider Foundation dated November 26, 2018.
3. Comment letter from Culligan San Paso Company dated November 29, 2018.