Los Angeles Regional Water Quality Control Board

July 19, 2023

Clete Saunier
Public Works Director
City of Santa Paula
970 Ventura Street
Santa Paula, CA 93060
csaunier@spcity.org

Via Email Only

DENIAL OF THE CITY OF SANTA PAULA'S REQUEST FOR INTERIM MILESTONE EXTENSION FOR THE SANTA PAULA WATER RECYCLING FACILITY AT 920 CORPORATION STREET, SANTA PAULA, CALIFORNIA (FILE NO. 06-189, CI-9259, ORDER NOS. R4-2018-0022 AND R4-2018-0023, GLOBAL ID WDR100000849)

Dear Clete Saunier:

The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties. The Santa Paula Water Recycling Facility (Facility), located at 920 Corporation Street, Santa Paula, California 93060, is within the Los Angeles Water Board jurisdiction. The City of Santa Paula (City) owns the Facility, which is operated by Ventura Regional Sanitation District.

On February 8, 2018, the Los Angeles Water Board adopted Waste Discharge Requirements (WDRs) Order No. R4-2018-0022 to authorize the City to discharge disinfected tertiary treated wastewater from the Facility. On the same date, Cease and Desist Order (CDO) No. R4-2018-0023 was adopted and required the City to manage the chloride-impacted groundwater at the site by reducing chloride loadings to the onsite percolation ponds and implementing its recycled water project to achieve compliance with the discharge limitations set forth in Order No. R4-2018-0022.

On May 3, 2022, the Los Angeles Water Board adopted an amendment to CDO No. R4-2018-0023-A01 for constructing an advanced water treatment facility (AWTF) using a reverse osmosis (RO) system at the Facility to comply with the concentration-based effluent limit for chloride of 110 milligrams per liter (mg/L).

In a January 17, 2023, conference call with the City and its consultants, the City discussed its plan to implement a proposed chloride source investigation study workplan that would delay interim CDO milestones. The City discovered that from January 2012 to December 2022, effluent chloride concentrations at the Facility have been declining from approximately 160 mg/L to 120 mg/L, and below 110 mg/L in some cases. Since 2020,

some monthly average chloride concentrations have been below the limit, but they were above 110 mg/L for the last three months. The City explained that before it commits to building the AWTF, it would like to know whether the long-term trend of decreasing chloride concentrations in the Facility effluent will continue or if future effluent chloride concentrations cannot predictably stay below the effluent limit. This declining trend, if continued, may affect the final design criteria for the AWTF.

At the February 15, 2023, City Council Meeting, the City Council directed its City staff to complete a chloride source identification study to explore chloride control strategies. The City Council also directed the City staff to simultaneously continue working towards execution of a final Clean Water State Revolving Fund (CWSRF) loan agreement with the State Water Board Division of Financial Assistance (DFA) for the AWTF project. It is our understanding that DFA has verbally indicated in several previous meetings with the City that as long as the general scope of the project has not substantially been changed, the CWSRF Loan could still be used to finance a smaller AWTF project with the loan amount amended, as needed.

In the City's March 13, 2023, letter, the City submitted the *City of Santa Paula Water Reclamation Facility Advanced Treatment System Update - Chloride Source Identification Study Workplan* (Workplan) for the Los Angeles Water Board's review and approval. The City stated in the letter that it will not be able to comply with two of the CDO interim milestones due to the delay in receipt of the final loan agreement and time required to perform the chloride source identification study and therefore, requested the Board's leniency when evaluating the City's compliance with the CDO. The City plans to investigate the chloride sources in the City's sanitary sewer collection system and water supply system by implementing the following six steps: (1) review existing information and develop an initial load estimate, (2) develop a monitoring plan, (3) inventory commercial and industrial users, (4) quantify chloride sources, (5) identify control strategies, and (6) prepare a report.

The Workplan states that the Chloride Source Identification Study will take seven to nine months to complete, depending on laboratory turn-around and stakeholder review times. If the study concludes that construction of the AWTF is still required to meet chloride effluent discharge limit, a delay of 16 to 18 months to release a bid package may occur. This would result in at least two of the CDO interim milestones being missed (complete and release the bid package by March 30, 2023, and select contractor and award contract for construction by June 30, 2023). However, the City is still committed to meeting the final CDO compliance deadline of February 8, 2028.

After reviewing the Workplan and the interim milestones extension request, the Los Angeles Water Board denies your extension request. The City is required to comply with the chloride effluent limit (equivalent to the 110 mg/L groundwater quality objective) by March 30, 2025 and with the groundwater limits by February 8, 2028. The City has had ample time to characterize the chloride sources and trends, which informed the City's previous methods to comply, as reflected in the chloride limits and schedule that our Board adopted as part of WDRs Order No. R4-2018-0022 and CDO No. R4-2018-0023.

Please continue to include a progress report on your compliance with the due dates in the quarterly self-monitoring reports submitted to the State Water Resources Control Board GeoTracker database as specified in Section 4 of CDO No. R4-2018-0023.

If you have any questions concerning this letter, please contact Water Resource Control Engineer Woonhoe Kim at woonhoe.kim@waterboards.ca.gov or the Groundwater Permitting Unit Supervisor James Kang at jim.kang@waterboards.ca.gov.

Sincerely,

Jenny Newman

Digitally signed by Jenny Newman
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for Susana Arredondo
Executive Officer

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