

The regulatory environment has changed since the major events in the life of the plant: 1) the 2006-07 period when Santa Paula was deliberating over the new wastewater plant in order to avoid fines for dumping into the river 2) the 2010 construction of the plant and 3) the 2017 written CDO (Cease and Desist Order) for excessive chlorides in the effluent.

Below is a list of significant regulatory actions related to wastewater:

1. Expert testimony on antibiotic resistance in wastewater...2016... Chapter 7.....

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/rw_dpr_criteria/ap_p_a_ep_rpt.pdf

2. A proposed framework for Direct Potable reuse...August 2019...

The density of microbiological pathogens (e.g., viruses, bacteria, parasites) in raw municipal wastewater is high enough to cause unacceptable levels of illness after a single, brief exposure. The density must be greatly reduced continuously by removal or inactivation in the environment and/or engineered treatment to yield safe drinking water.
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/direct_potable_reuse/dprframewkseced.pdf

3. Water Conservation Executive Order 2019... .unachievable except through the use of wastewater...

<https://www.acwa.com/news/acwa-statement-on-gov-gavin-newsoms-executive-order/>

4. PFA contamination in water Massive findings ... 2019

<https://www.latimes.com/politics/story/2019-10-10/california-finds-widespread-contamination-of-chemicals>

State asking for testing immediately of all landfills and airports. More to come.

<https://www.waterboards.ca.gov/pfas/>

5. Federal EPA issues PFA testing on water and plans announcement on biosolids 2020

<https://www.epa.gov/pfas>

Goals Going Forward

1. Elimination of Percolation Ponds.

Any solution should eventually lead to the elimination of percolation ponds where the chlorides, bacteria and PFAs not trapped by the membranes reside.

2. Creation of a Regional Wastewater Strategy Council

All water agencies in the Santa Paula Basin should band together to create a regional council for the solution of wastewater disposal, potable reuse and water conservation. The council should include cities, unincorporated areas and agencies such as the UWCD and Ventura County Sanitation District and the Water Board representatives for the Ventura area, in addition to all wastewater management in these areas. The chair of this council should be an agency such as VCSD with bonding power to sell bonds for the new projects.

3. Review/revisit the MKN plan for any solution which might be in furtherance of the above two goals. Link to document here: http://roathdesign.com/santapauladocs/mkn_report.pdf

The city needs to be looking forward with any new wastewater plans rather than backward by simply solving for chlorides.