



Department Memorandum

DATE: November 5, 2025
TO: Utility Commission
FROM: Michael Luther, PE, Utility Director
SUBJECT: Wastewater Division November Commission Update

The Lompoc Regional Water Reclamation Plant (LRWRP) has submitted all required reports on time, and the following activities took place:

- The Sewer System Management Plan (SSMP) has been updated and is uploaded to the City's wastewater website.
- The monthly Certification of "No-Spills" for September 2025 has been submitted to the State Water Resources Control Board (SWRCB) through the California Integrated Water Quality System (CIWQS) data portal;
- A Wastewater operator conducted weekly services, and sampling for Vandenberg Space Force Base (VSFB) 's two wastewater treatment units under contract with VSFB. The Wastewater Operations Supervisor submitted the September and October 2025 monthly operation report to VSFB report, as required by the contract;
- Supervisors attended the SAMA meeting on October 8th;
- Laboratory staff attended a Yorke Engineering webinar for hazardous waste.
- Troubleshooting and repair of UV transmittance monitor. Electicraft came out on Tuesday October 14th, to troubleshoot the Automatic Transfer Switch in the UV Building.
- Painting/corrosion control on His blower #1, and both DAFT service air compressors took place.
- Mechanical seal replacement on Influent Pump #4.
- Submitted quarterly and monthly NPDES reports; two violations for the month of September:
 1. Unionized ammonia a class 1 violation
 2. Temperature violation considered observational
- Received written approval from the State regarding the Sewer Use Ordinance (SUO) and Emergency Response Plan (ERP) on October 23, 2025. Staff is preparing to take the items to Council for approval on 12/2. A summary of the SUO and ERP history and timeline is attached for reference.
- Finalized the quarterly pretreatment report.

The Wastewater Division is working with the Human Resource Department to schedule interviews to fill the Wastewater Manager position.

The Design contract for Headworks and Influent Meter Improvement Project (RFP No. 2025-RFP-015DW), which was presented to the Commission at the September meeting, was

awarded by Council to GHD Inc. on October 7. The contract is currently being executed by both parties and a kickoff meeting is anticipated to be scheduled shortly afterwards.

Overview of SUO and ERP update

Rationale for Amendments:

- General updates of the sewer use ordinance (SUO) in Chapter 13.16 of the Lompoc Municipal Code and Enforcement Response Plan (ERP) to address:
 - Requirements and recommendations from Central Coast Regional Water Quality Control Board (Water Board) findings from pretreatment compliance inspections and audits of the City's Pretreatment Program (most recently, 2016 and 2017).
 - Resolve stakeholder concerns about oversight of dialysis wastes; Fats, Oils, and Grease (FOG) Control Program implementation; and other user permitting issues.
 - Address requirements from EPA Administrative Order on Consent (AOC) (September 2020).
 - Address SUO concerns mentioned in Environmental Defense Center (EDC) Notice of Intent to file lawsuit (September 2020).
- The EPA- and State-approved SUO and ERP must be adopted by the City Council and implemented by City staff by December 22, 2025, to meet the requirement (implementation within 60 days of written approval by EPA and the Water Board) imposed by the AOC provisions 37 and 38.

Overview of Amendments:

- Revised definition of terms including *domestic wastewater* and *infectious waste*
- Updated conditions controlling discharge of water softening waste and revision to criteria for allowable water softeners
- Incorporate 2005 Streamlining Rule-required ordinance changes and optional provisions, including updated term definitions, monitoring waivers for pollutants not expected to be present, the non-significant categorical industrial user classification, general permits, and best management practices
- Clarification of City legal authorities (i.e., to prohibit / condition discharges, issue permits, include certain provisions in user permits, take enforcement according to the City's ERP)
- Inclusion and clarification of user notification, monitoring, and reporting requirements
- Formal establishment of a high-strength wastewater surcharge program
- Addition of authority for administrative fines
- Revision of appeals process
- Addition of Article 8 addressing regulation of waste received from other jurisdictions
- Addition of Article 9 addressing control of FOG-discharging facilities

Relevant Milestone Dates:

September 2, 2020 EPA AOC Docket No. CWA-309(a)-20-006 is effective

September 11, 2020 Environmental Defense Center (EDC) sends Notice of Intent to File Suit to City

October 27, 2020	Per AOC Provision 38, City delivers updated ERP to EPA and the Water Board
November 24, 2020	Per AOC Provision 36, City submits Summary of Proposed Changes to SUO to EPA
January 26, 2021	City receives EPA's disapproval letter of proposed changes to the SUO and ERP, including updated definitions of <i>domestic waste</i> and <i>infectious waste</i>
February 24, 2021	EDC files a Complaint against the City asserting claims under the Clean Water Act in the U.S. District Court (Central District of CA)
May 26, 2021	City receives letter from EPA disapproving sections of the updated ERP
June 7, 2021	The City files its Answer to EDC's Complaint
June 15, 2021	City staff meets with EPA via teleconference to discuss the ERP and SUO disapproval issues and resolve EPA's concerns
July 22, 2021	City delivers revised ERP to EPA and the Water Board
August 19, 2021	City delivers updated SUO and a FOG Control Program to meet the conditions approved in the Summary document to EPA and the Water Board
Aug 2021 – Nov 2024	Various correspondences between EPA, Water Board, and the City regarding the ERP and SUO update process
November 6, 2024	City receives one final comment from EPA on the ERP
November 21, 2024	City delivers the finalized version of the SUO and ERP to EPA and the Water Board
December 5, 2024	City receives EPA staff approval (in writing) of the City's updated ERP and SUO
July 1, 2025	City receives comments on ERP and SUO from the Water Board
October 6, 2025	After various correspondence to discuss the Water Board's July comments (and subsequent comments) and revision of documents, City delivers final versions of the ERP and SUO to the Water Board
October 23, 2025	City receives written approval from Water Board for the ERP and SUO