



Wastewater
Treatment



TRANSFORMING
WASTEWATER
TO RESOURCES



Recycled
Water



Energy
Production



Biosolids
Reuse

Pretreatment Program: Amended Sewer Use Ordinance

Special Board of Directors Meeting
February 4, 2026

Background Pretreatment Program



- Clean Water Act, U.S. EPA, and NPDES permit require District to operate an approved Pretreatment Program to reduce potential for adverse impacts to water and biosolids quality
 - Focus is on industrial and commercial dischargers in service area
- District is required to periodically evaluate and update technically-defensible “local limits” for various pollutants
- District completed a Local Limits Report (Larry Walker Associates, Jun 2024), which was approved by the Regional Water Board (RWB) (Dec 2025)
- RWB is expected to consider adoption of District’s NPDES Tentative Order permit on February 11, 2026

Overview

Local Limits Report



- Applies uniform local limits allocation method for all Pollutants of Concern (POCs) with implementation as daily maximum concentrations
 - Exception is Total Dissolved Solids (TDS), which will use a mass-based loading allocation
 - Adds local limits for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), and TDS
- Removes local limits for legacy POCs, including phenols and Total Toxic Organics (TTOs)

Overview

District Code Modifications



- Proposed Amended Sewer Use Ordinance No. 130 has been developed to incorporate Local Limits Report in District Code (DC) (DC Chapter/Section 2.28.050)
- In addition, staff has addressed key finding from an audit of the District's Pretreatment Program (2020)
 - Clarify District authority over industrial users from contributing jurisdictions (DC Chapter/Section 2.28.004)
 - Codify 30-day appeal period for wastewater discharge permits (DC Chapter/Section 1.12.020)—consistent with U.S. EPA guidance
- Customer Outreach
 - District notified industrial and commercial customers of proposed local limits in December 2023, included comment letter received (5) in submittal to RWB in May 2025

Recommended Board Actions



- **Consider** introduction of Ordinance No. 130 amending Sewer Use Ordinance, Chapter 1.12 (Appeal Process), and Chapter 2.28 (Pretreatment Regulations) of District Code; **Waive** reading; and **Set** March 11, 2026 as date for adoption
- **Next Steps**
 - If adopted on March 11, 2026, District would publish ordinance, update Industrial Wastewater Discharge Permits with 30-day appeal language, notify industrial users, and begin enforcement and monitoring under new local limits