



## Central Coast Regional Water Quality Control Board

January 13, 2026

Chris Huot  
City Manager  
City of Paso Robles  
1000 Spring Street  
Paso Robles, CA 93446  
Email: [citymanager@prcity.com](mailto:citymanager@prcity.com)

**Via Electronic Mail and Certified Mail  
7019 1640 0000 7909 6573**

Dear Chris Huot:

**ENFORCEMENT PROGRAM: CITY OF PASO ROBLES WASTEWATER  
TREATMENT FACILITY, 3400 SULPHUR SPRINGS ROAD, SAN LUIS OBISPO  
COUNTY, WDID 3 400105001 – EXPEDITED PAYMENT PROGRAM – EXECUTED  
ADMINISTRATIVE CIVIL LIABILITY ORDER R3-2025-0077 TO RESOLVE PERMIT  
VIOLATIONS**

Attached is Administrative Civil Liability Order R3-2025-0077 (ACL Order) signed by the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) Executive Officer. The ACL Order resolves mandatory minimum penalties for the City of Paso Robles's (Discharger) violations of effluent limitations contained in Waste Discharge Requirements (WDR) Order R3-2021-0001, National Pollutant Discharge Elimination System Permit (NPDES) CA0047953, that occurred from April 30, 2024, to April 30, 2025, as shown in the notice of violation (NOV) attached to the ACL Order. Central Coast Water Board staff publicly noticed the Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver) from November 19, 2025, to December 21, 2025, and received no comments.

As provided in the ACL Order, the Discharger is subject to a total payment amount of \$15,000 (Penalty Amount). The Discharger elected to allocate the full Penalty Amount as Supplemental Environment Project funds to the Bay Foundation of Morro Bay's (Bay Foundation) Central Coast Drinking Water Well Testing Program (Drinking Water Well Testing Program). The Discharger must make payments as shown below, **no later than February 12, 2026**:<sup>1</sup>

**1. Payment to the Drinking Water Well Testing Program**

- a. See attached invoice to facilitate this payment. Pay \$15,000 by check payable to "Bay Foundation of Morro Bay," noting "ACL Order R3-2025-

<sup>1</sup> Please note that this due date supersedes any other due date that may be shown on invoices.

0077" on the check, and mail to:

Bay Foundation of Morro Bay  
Attention: Melodie Grubbs, Executive Director  
601 Embarcadero, Suite 11  
Morro Bay, CA 93442

- b. Submit copies of the above payment by email to Kelsey DeLong at [kelsey.delong@waterboards.ca.gov](mailto:kelsey.delong@waterboards.ca.gov) or mail to:

Central Coast Regional Water Quality Control Board  
Enforcement Unit  
Attention: Kelsey DeLong  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906

- c. The Discharger will not have any additional obligations related to the Drinking Water Well Testing Program upon proof of payment to the Bay Foundation. If the funds are not spent on the Drinking Water Well Testing Program by January 12, 2029, the Bay Foundation will send any remaining funds to the State Water Pollution Cleanup and Abatement Account.

Payment of the full Penalty Amount will conclude the Central Coast Water Board's enforcement action for the violations identified in the NOV attached to the ACL Order.

If you have any questions, please contact Mark Lemus at [mark.lemus@waterboards.ca.gov](mailto:mark.lemus@waterboards.ca.gov) or (805) 549-3703, or Kelsey DeLong at [kelsey.delong@waterboards.ca.gov](mailto:kelsey.delong@waterboards.ca.gov) or (805) 594-6182.

Sincerely,

Ryan E. Lodge  
Executive Officer

Attachments:

1. Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing; Administrative Civil Liability Order R3-2025-0077
2. Invoice R3-2025-0077 – "Drinking Water Testing Program SEP" for payment to Bay Foundation of Morro Bay

cc via email:

**City of Paso Robles:**  
Casey Shepherd, Wastewater Manager

[cshepherd@prcity.com](mailto:cshepherd@prcity.com)

**Other Agencies or Interested Parties:**

Melodie Grubbs, Bay Foundation of Morro Bay Executive Director,  
[mgrubbs@mbnep.org](mailto:mgrubbs@mbnep.org)

**Central Coast Water Board:**

Ryan Lodge, [ryan.lodge@waterboards.ca.gov](mailto:ryan.lodge@waterboards.ca.gov)

Angela Schroeter, [angela.schroeter@waterboards.ca.gov](mailto:angela.schroeter@waterboards.ca.gov)

Kelsey DeLong, [kelsey.delong@waterboards.ca.gov](mailto:kelsey.delong@waterboards.ca.gov)

Tamara Anderson, [tamara.anderson@waterboards.ca.gov](mailto:tamara.anderson@waterboards.ca.gov)

Mark Lemus, [mark.lemus@waterboards.ca.gov](mailto:mark.lemus@waterboards.ca.gov)

Julia Dyer, [julia.dyer@waterboards.ca.gov](mailto:julia.dyer@waterboards.ca.gov)

Todd Stanley, [todd.stanley@waterboards.ca.gov](mailto:todd.stanley@waterboards.ca.gov)

File Location: R:\RB3\Shared\Enforcement\ACLs\MMP ACLO from EPL Offers\2025-0077-Paso MMP ACLO\Paso WWTP MMP ACLO 25-0077 Ltr.docx

ECM Primary Indexing # 247750

**ACCEPTANCE OF CONDITIONAL SETTLEMENT OFFER  
AND WAIVER OF RIGHT TO HEARING;**

**ADMINISTRATIVE CIVIL LIABILITY ORDER R3-2025-0077**

City of Paso Robles (Discharger)  
Wastewater Treatment Facility  
3400 Sulphur Springs Road  
San Luis Obispo County  
Waste Discharge Requirements Order R3-2021-0001  
National Pollutant Discharge Elimination System (NPDES) Permit CA0047953  
WDID: 3 400105001

By signing below and returning this Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing (Acceptance and Waiver) to the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board), the Discharger hereby accepts the Conditional Settlement Offer from the Assistant Executive Officer to participate in the expedited payment program to settle the alleged violations and waives the right to a hearing before the Central Coast Water Board to dispute the alleged violations. The alleged violations are identified in the attached notice of violation (NOV).

The Discharger agrees that the NOV shall serve as a complaint pursuant to Division 7, Chapter 5, Article 2.5 of the California Water Code and that no separate complaint is required for the Central Coast Water Board to assert jurisdiction over the alleged violations. The Discharger agrees to pay the mandatory minimum penalties (Penalty Amount) authorized by California Water Code sections 13385 and 13385.1, as specified in the NOV, which shall be deemed payment in full of any civil liability pursuant to Water Code sections 13385 and 13385.1 that otherwise might be assessed for the violations described in the NOV. The Discharger understands that by signing this Acceptance and Waiver, the Discharger waives its right to contest the allegations in the NOV and the amount of administrative civil liability for such violations.

The Discharger understands that this Acceptance and Waiver does not address or resolve liability for any violation that is not specifically identified in the NOV.

The Discharger understands that federal regulations set forth in title 40, Code of Federal Regulations, section 123.27(d)(2)(iii) require the Central Coast Water Board to publish notice of and provide at least 30 days for public comment on any proposed resolution of an enforcement action addressing NPDES permit violations. Accordingly, Central Coast Water Board staff will publish this Acceptance and Waiver for public comment.

If no public comments or new material facts are received within the public comment period that cause the Central Coast Water Board Assistant Executive Officer to reconsider the proposed Conditional Settlement Offer, the Executive Officer, through its delegated authority by the Central Coast Water Board, will consider execution of the Acceptance and Waiver as the executed Administrative Civil Liability Order R3-2025-0077 (ACL Order) that resolves the alleged violations identified in the NOV.

Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;  
Administrative Civil Liability Order R3-2025-0077

If significant public comments are received in opposition to the Acceptance and Waiver and/or new material facts become available that are relevant to the Acceptance and Waiver, the Central Coast Water Board Assistant Executive Officer may withdraw the Conditional Settlement Offer. In that circumstance, the Central Coast Water Board Assistant Executive Officer may issue a revised Conditional Settlement Offer or may issue an administrative civil liability complaint and the matter would be set for a hearing before the Central Coast Water Board. For such a civil liability hearing, the Discharger understands that this Acceptance and Waiver executed by the Discharger will not be used as evidence against the Discharger.

Penalty Amount: \$15,000

The Discharger must fill in the blank boxes in Table 1 below to indicate how the Discharger will direct its payment of the Penalty Amount. Payment is not due until after Central Coast Water Board staff completes the public comment period and the Executive Officer issues the ACL Order as described herein.

The Discharger's payment options are shown below.

1. Payment Option 1 – Direct the entire Penalty Amount as Supplemental Environmental Project (SEP) funds towards the Bay Foundation of Morro Bay's (Bay Foundation) Central Coast Drinking Water Well Testing Program (Drinking Water Well Testing Program). See the *Bay Foundation's Drinking Water Well Testing Program – Use of Supplemental Environmental Project Funds summary document*<sup>1</sup> for more details about the program.
2. Payment Option 2 – Direct a portion of the Penalty Amount as SEP funds towards the Drinking Water Well Testing Program, and direct the remaining portion of the Penalty Amount to the State Water Pollution Cleanup and Abatement Account.<sup>2</sup> If the Discharger elects to allocate only a portion of the Penalty Amount towards the Drinking Water Well Testing Program, then the Discharger must pay the remaining Penalty Amount to the State Water Pollution Cleanup and Abatement Account.
3. Payment Option 3 – Reject the option to direct any of the Penalty Amount towards the Drinking Water Well Testing Program and instead pay the entire Penalty Amount to the State Water Pollution Cleanup and Abatement Account.

---

<sup>1</sup> Bay Foundation's Drinking Water Well Testing Program – Use of Supplemental Environmental Project Funds summary document:

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/enforcement/docs/2024/summary-drinking-water-well-testing-sep.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/enforcement/docs/2024/summary-drinking-water-well-testing-sep.pdf)

<sup>2</sup> Cleanup and Abatement Account:

[https://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/cleanup\\_and\\_abatement.html](https://www.waterboards.ca.gov/water_issues/programs/grants_loans/cleanup_and_abatement.html)

For Payment Option 1 or 2, the Discharger will not have any additional obligations related to the Drinking Water Well Testing Program upon proof of payment to the Bay Foundation. Electing to pay all or a portion of the Penalty Amount to the Drinking Water Well Testing Program will not change the total Penalty Amount that must be paid to resolve the mandatory minimum penalties for the alleged violations.

**Table 1: Penalty Amount Payment Option Selection**

*(Please note that no payments are due at the time the Discharger returns this signed Acceptance and Waiver form to the Central Coast Water Board.)*

Payment Options	Mark "X" Below to Select One Payment Option	Enter SEP and CAA Portions of Penalty Amount (\$) if Payment Option 2 Selected
<b>Payment Option 1:</b> Direct entire Penalty Amount as SEP funds to the Central Coast Drinking Water Well Testing Program	<input checked="" type="checkbox"/>	No entry required in this box. Entire Penalty Amount will be directed as SEP funds to the Central Coast Drinking Water Well Testing Program.
<b>Payment Option 2:</b> Direct portion of Penalty Amount as SEP funds to the Central Coast Drinking Water Well Testing Program, and the remaining portion to the State Water Pollution Cleanup and Abatement Account (CAA)	<i>If "X" marked in this box, then enter portion amounts in box to the right.</i>	Portion of Penalty Amount to direct as SEP funds to the Central Coast Drinking Water Well Testing Program: \$ _____  Portion of Penalty Amount to direct to the CAA: \$ _____  <b>Sum of amounts entered in this box must equal the Penalty Amount.</b>
<b>Payment Option 3:</b> Direct entire Penalty Amount to the State Water Pollution Cleanup and Abatement Account (CAA)		No entry required in this box. Entire Penalty Amount will be directed to the CAA.

Upon signature by the Discharger, the Discharger must return this Acceptance and Waiver in pdf format via email or mail to:

Tamara Anderson  
Enforcement Coordinator

Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;  
Administrative Civil Liability Order R3-2025-0077

Email: [tamara.anderson@waterboards.ca.gov](mailto:tamara.anderson@waterboards.ca.gov)

Central Coast Water Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

**The Discharger understands that no payments are due at the time it returns the signed Acceptance and Waiver form to the Central Coast Water Board.** After the required public comment period and execution of the Acceptance and Waiver as the executed ACL Order by the Executive Officer, the Central Coast Water Board will transmit the executed ACL Order to the Discharger. The transmittal letter will include payment due dates and payment instructions based on the payment options selected in the Acceptance and Waiver. The full payment of the Penalty Amount shall be due within 30 calendar days of the executed ACL Order. Furthermore, the Discharger understands that full payment within 30 calendar days of the executed ACL Order is a material condition of this Acceptance and Waiver. Failure to pay the Penalty Amount within the required time period may subject the Discharger to further liability.

Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;  
Administrative Civil Liability Order R3-2025-0077

**IT IS SO STIPULATED.**

I hereby affirm that I am duly authorized to act on behalf of and to bind the Discharger in the making and giving of this Acceptance and Waiver.

---

By: G. J. S.  
(Signed Name)

11-7-2025  
(Date)

Casey Shepherd  
(Printed or Typed Name)

Cshepherd@prcity.com  
(Email)

Wastewater Manager  
(Title)

Acceptance of Conditional Settlement Offer and Waiver of Right to Hearing;  
Administrative Civil Liability Order R3-2025-0077

**IT IS HEREBY ORDERED** pursuant to Water Code section 13323 and Government Code section 11415.60 on behalf of the California Regional Water Quality Control Board, Central Coast Region that ACL Order R3-2025-0077 is hereby adopted.

By: \_\_\_\_\_

Ryan E. Lodge  
Executive Officer  
Central Coast Water Board

**Attachment:** Notice of Violation

File Location: R:\RB3\Enforcement\EPLs\2025-0077-Paso WWTP\Paso WWTP MMP EPL 25-0077 Waiver.docx

ECM Primary Indexing # 247750

**Exhibit A – Notice of Violation**  
**City of Paso Robles Wastewater Treatment Facility**  
**Mandatory Minimum Penalty Violations Requiring Enforcement**  
**Alleged Violation Dates: April 30, 2024 – April 30, 2025**

The enforcement staff of the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) reviewed information submitted by this facility to determine whether the discharger is subject to mandatory minimum penalties (MMPs) pursuant to subdivisions (h) and (i) of California Water Code section 13385 and section 13385.1. The following table or tables list this facility's alleged violations of Waste Discharge Requirements Order R3-2021-0001, National Pollutant Discharge Elimination System Permit CA0047953 from April 30, 2024, to April 30, 2025, for which the Central Coast Water Board has not yet assessed MMPs. Final calculation of MMP amounts and definitions of some of the terms used in this document are listed below the table.

For additional information about the alleged violations listed in the table, please refer to [the State Water Resources Control Board CIWQS Public Reports webpage](#) and select the “Mandatory Minimum Penalty (MMP) Report” link located under the “Violations Reports” category. Once in the Mandatory Minimum Penalty Reports search page, select Region 3 along with the beginning and ending dates shown in this exhibit, select Run Report, and then select your facility to access the list of violations. Expand the “Effluent MMP Violations” and/or “Late Report MMP Violations” sections of that page by selecting the “+” icon to the left of the section titles. To view details of a violation, select the “Violation ID” number. For chronic (non-serious) effluent violations, select the “Chronic” link in the “MMP Type” column of the “Effluent Limit Violations” section to see a list of the three or more violations preceding each chronic violation within 180 days and thus qualifying the chronic violation as an MMP.

**Effluent MMP Violations Table**

#	Violation Number	Violation Date	Pollutant	Pollutant Type	Limit Period	Limit	Result	Units	% Over Limit	S or C for Serious or Chronic (Non-Serious) Violation	Date 180 Days Prior	Number of Violations within 180 days	Mandatory Minimum Penalty
1	1129882	4/30/24	Copper, Total	Group 2	Monthly Average	8.8	14.3	ug/L	63%	S	N/A	N/A	\$ 3,000
2	1133037	7/31/24	Copper, Total	Group 2	Monthly Average	8.8	10.9	ug/L	24%	S	N/A	N/A	\$ 3,000
3	1138605	10/31/24	Copper, Total	Group 2	Monthly Average	8.8	13.7	ug/L	56%	S	N/A	N/A	\$ 3,000
4	1141752	1/31/25	Copper, Total	Group 2	Monthly Average	8.8	21.1	ug/L	140%	S	N/A	N/A	\$ 3,000
5	1144429	4/30/25	Copper, Total	Group 2	Monthly Average	8.8	11.3	ug/L	28%	S	N/A	N/A	\$ 3,000

Total Penalty for Effluent Violations: \$15,000

Calculation of Total Mandatory Minimum Penalty Amount for Effluent Violations:

$$(5 \text{ Serious Violations} + 0 \text{ Non-Serious Violations}) \times \$3,000 = \$15,000$$

For Group 2 pollutants, a violation is serious when the limit is exceeded by 20% or more. Each serious violation is subject to a mandatory minimum penalty of \$3,000.

<b>Term</b>	<b>Definition</b>
Units	ug/L = micrograms per liter
N/A	Not Applicable
CIWQS	California Integrated Water Quality System database used by the Water Boards to manage violation and enforcement activities, as well as other data types relevant to water quality protection.
Violation Number	Identification number assigned to a violation in CIWQS.
Violation Date	Date that a violation occurred, with the exception that for some violation types, such as a monthly average, the last day of the reporting period is used. If the occurrence date is unknown, the date used is the day the violation was first discovered by staff, the Discharger, or a third party.
Pollutant Types: Group 2	Group of pollutants defined in the State Water Resources Control Board Water Quality Enforcement Policy. Also referred to as Category 2 or CAT2.

File Location: R:\RB3\Enforcement\EPLs\2025-0077-Paso WWTP\Paso WWTP MMP EPL 25-0077 Exh A.docx

ECM Primary Indexing # 247750

California Regional Water Quality Control  
Board, Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

# INVOICE

INVOICE R3-2025-0077  
JANUARY 13, 2026

**INVOICE TO:**

Chris Huot  
City Manager  
City of Paso Robles  
1000 Spring Street  
Paso Robles, CA 93446  
Email: [citymanager@prcity.com](mailto:citymanager@prcity.com)  
WDID 3 400105001

**MAIL PAYMENT TO:**

Bay Foundation of Morro Bay  
Attention: Melodie Grubbs, Executive  
Director  
601 Embarcadero, Suite 11  
Morro Bay, CA 93442  
Email: [mgrubbs@mbnep.org](mailto:mgrubbs@mbnep.org)

**Subject:** Supplemental Environmental Project (SEP) Funds for the Central Coast  
Drinking Water Well Testing Program (Drinking Water Testing Program) – Portion of  
Penalty for Settlement Agreement and Stipulation for Entry of Administrative Civil Liability  
Order R3-2025-0077, San Luis Obispo County

**Instructions:**

1. Make check payable to: *Bay Foundation of Morro Bay*
2. Write the order number in the notes section of the check as follows: *ACL Order R3-2025-0077*
3. Mail one copy of this invoice with the original check to the Bay Foundation at the “Mail Payment To” address provided above
4. Email or mail a copy of this invoice **and a copy of the check** to:

Central Coast Regional Water Quality Control Board  
Enforcement Unit  
Attention: Kelsey DeLong  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906  
[kelsey.delong@waterboards.ca.gov](mailto:kelsey.delong@waterboards.ca.gov)