

COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT
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PHILLIP M. DEMERY
Director



August 23, 2004

Mr. Roger W. Briggs, Executive Officer
California Regional Water Quality Control Board, Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93101

Attn: Todd Stanley, Water Resources Control Engineer

Re: Draft Waste Discharge Requirements for Wastewater Collection Agencies
tributary to the city of Santa Barbara El Estero Wastewater Treatment Facility

Dear Mr. Briggs and Mr. Stanley:

Thank you for forwarding a draft of Order R3-2004-0123. The following are general comments along with comments to specific cited references:

General Comments:

1. The permit should specifically reference the Mission Canyon Sewer District (County Service Area 12). While the County of Santa Barbara owns and operates this collection system, it is a specific cost center with its own revenue generation mechanisms.
2. Permit requirements specific to collection systems within WDRs are relatively new. However, because collection systems in the past have functioned without any type of permit, it is somewhat problematic to adopt WDRs on collection only systems in such a short period of time (July 27, 2004 notice and October 22, 2004 adoption). While EPA CMOM criteria has been generally well distributed, implementation of the plans and requirements included in draft Order R3-2004-0123 will take a full fiscal year. This is primarily because funding structure of the of the sewer district which goes through a funding review each spring.
3. Map - enclosed are maps for your use.
4. For your information, the Mission Canyon Sewer District provides two functions. One is to manage the sewer collection system within its boundaries (Public Works Department), the other is to track the performance of the septic systems within its boundaries (Public Health Department – Environmental Health Services).
5. Is there a minimum size (flow, length, population) for a collection system to be regulated by WDRs?
6. How does the permit fee structure work for this type of WDR?

AA /EEO Employer

Thomas D. Fayram, Deputy Director

Scott D. McGolpin, Deputy Director

Rochelle Camozzi, Business Manager

Michael R. Fr

Item No. 11 Attachment No. 2
October 22, 2004 Meeting
Wastewater Collection System
Tributary to El Estero WWTP

Specific Comments:

7. Finding 1, page 1 - Name Mission Canyon Sewer District (Santa Barbara County Service Area 12) as permittee instead of County of Santa Barbara.
8. Finding 2, page 1 - Please state authority(ies) for issuance of WDRs on collection systems in the Order. The public when reading this Order needs to know these regulations are mandated and not simply the will of the permittee.
9. Finding 11, page 2 - Please clarify "privately owned systems." Private systems include private main lines (such as in a condo or commercial development or shopping mall) in addition to the building and lateral sewers (side sewer) that extend from a building to a public main line but are privately owned and maintained. The Mission Canyon Sewer District cannot be held accountable for private facilities since it cannot be regulated on facilities it does not own. Responsibility for system maintenance and overflows on private facilities is that of the facility owner.
10. Finding 13, page 2 - Should this read "The issuance of waste discharge requirements order will:"? Line (a) - Does not make sense, individual requirements are proposed for each permittee (city and county). Line (d) - Please reference code section this assembly bill was written into.
11. Finding 14, page 3 - Clarify county as "unincorporated county areas."
12. Finding 19, page 3 - The annual reporting date of January 30 is problematic for some of the reports listed in the Monitoring and Reporting Program (MRP) since the time frame between October 22, 2004 and January 30, 2005 is too short.
13. Prohibition 5, page 4 - The term "pollutant-free" basically refers to storm water runoff. The county's ordinances already prohibit storm water discharge into its sewer systems. However, illegal connections have occurred in the past.
14. General Provision 3, page 3 - the efforts required to comply with this provision will require additional revenues not currently built into the revenue structure. It will take at least one FY to determine the added costs as well as time to perform a capacity study.
15. Reporting Provision 2, page 5 - Same as 14 above. Schedule in MRP may be a little aggressive.
16. Reporting Provision 4, page 5 - The Permittee shall report any sewage overflows from its system. Spills from private mains and private laterals should be reported directly to the regulatory agencies if required. Usually, private plumbers are called to remedy these situations. Also, in order to prevent private spills, the Uniform Plumbing Code regulates when backflow devices on laterals are required. The failure of a builder to install these devices can be problematic and yet is the responsibility of the building departments issuing building permits.
17. Reporting Provision 22, page 8 - It is presumed that the 4 year capacity attainment is to be based on projected growth from a general or specific plan adopted by a planning department. Last sentence should read "... the required technical report shall be prepared with public participation and reviewed by all planning and building departments providing these services to the area served by the wastewater collection system". In the case of the Mission Canyon Sewer District, growth projections and capacities were addressed when the system was originally constructed as described in the Mission Canyon Specific Plan.

18. Definitions, page 10 - Include a definition of "discharge." Ordinarily, discharge refers to effluent (influent having been treated to certain standards).
19. Report of Waste Discharge I.a., page 10 - Water Code Sections 13260 (1) and 13263 identify the need to file reports of discharge for discharges of waste other than into a community sewer system since Section 13050 "person" includes cities, counties, districts, etc... In light of state law, it seems that WDRs are not the proper vehicle for implementation of SSO regulation on satellite or tributary sewage collection systems. Perhaps there are federal guidelines for implementing these kinds of requirements in the EPA CMOM criteria. This issue certainly needs to be addressed before the Order can be adopted.
20. Staff Report, Key Information - Identify permittee as Mission Canyon Sewer District. Location should state area encompassed by district.
21. Staff Report, Summary - Cite authority to issue WDR for collection system. WDRs are generally for discharges to land.
22. Staff Report, Discussion on page 2, third paragraph - Sewage system blockages can back-up into homes, causing..." Generally no basements in California. Again, backflow prevention is required under certain conditions by the UPC. First bullet - "...including video inspection to assess sewer line condition."
23. MRP, A.1.k. - ...problems related to its sanitary sewer system overflows..."
24. MRP, D - Reporting Schedule. Infiltration/Inflow and Spill Prevention Program Report should refer to WDR, Section D.4.
25. MRP, B.4. - "For spills to fresh water, samples shall, at minimum, be analyzed for total and fecal coliform bacteria and enterococcus bacteria to marine water.
26. MRP, IV. I. - Overflows from private property caused by a plug in a private line are the responsibility of the property owner. The plan presumably relates to the overflows that may result from a private system as a result of a plug in the public sewer receiving flows from the private sewer.

Please contact me at 739-8755 to discuss any of these comments or any other questions you may have.

Sincerely,



Martin Wilder, P.E.
Mission Canyon Sewer District Manager

Copy: Phil Demery, Director
Mark Schleich, Deputy Director
Rochelle Camozzi, Business Manager
Mark Moya, Chief Plant Operator
David McDermott, County Counsel
Mark Paul, Auditor-Controller's Office
Rick Merrifield, EHS Director
Ray Aromatorio, Risk Management (Carl Warren & Co.)
Rebecca Bjork, City of Santa Barbara