



Engineering and Building
Services Department

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

Building	310 318-0636
Engineering	310 318-0661
fax	310 374-4828

October 19, 2009

Waste Discharge Requirements Unit
State Water Resources Control Board
1001 I Street, 15th floor
Sacramento, CA. 95814

Submitted via email to: SSOcommentletters@waterboards.ca.gov

Subject: Comments on "Sanitary Sewer Overflow Reduction Program Review and Update"

Thank you for the opportunity to provide comments on the Sanitary Sewer Overflow Reduction Program Review and Update process. Since there has not been sufficient time for complete implementation, the City strongly encourages the Board to allow more time for implementation and refinement of the existing Order's requirements before it is reopened for potentially new and modified requirements. Over the past several years, the City has significantly increased the resources dedicated to the wastewater system including: funding and hiring a new Wastewater Associate Civil Engineer position; hiring AKM Consultant Engineers to assist the City in meeting and updating Order requirements; evaluating and increasing the wastewater user fee; and reorganizing staff resources to implement new Order requirements.

We are currently diligently working to refine and improve our wastewater system operations, including implementing revisions to the O&M Plan, developing an updated Sewer Master Plan and CIP Program, and revising several codes associated with the wastewater system. Several of these activities will take at least another year before we can fully capitalize on the outcomes. This is due to the necessary time required for wet weather wastewater system impacts (2009/2010 wet weather flow monitoring) and necessary time for analysis, City Council review and processing, resource allocation, and field implementation. Allowing more time for implementation and refinement will result in the development of improved best management practices that will result in reduced SSO's throughout the State.

The City also strongly encourages the Board to take a leadership role in overseeing and streamlining regulations associated with SSO reporting. The City has been working with the County of Los Angeles Public Health Department on clarifying SSO reporting requirements. However, there are a plethora of agencies that require different notifications. This makes the notification requirements confusing and often time impedes the clean-up or field actions required.

In conclusion, we believe additional time is necessary in order to realize the full benefits from the Order, and that additional research and analysis of the existing requirements should be made prior to revisions being made. We would like to request the Board not reopen the SSO WDR at this time. We look forward to working with Board staff in the future.

Thank you for the opportunity to provide comments on this important issue. Please contact Ms. Geraldine Trivedi by telephone at (310) 318-0661, extension 2036, or via email at Geraldine.Trivedi@redondo.org if you have any questions regarding these comments.

Sincerely,



Steve Huang, Director

cc: Bill Workman, City Manager
David Biggs, Assistant City Manager
Sylvia Glazer, Director of Public Works
Geraldine Trivedi, Associate Civil Engineer