

October 19, 2009

Mr. James Fischer  
Waste Discharge Requirements Unit  
State Water Resources Control Board  
1001 I Street, 15<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: SSO Reduction Program Review and Update**

Dear Mr. Fischer:

Thank you for the opportunity to provide the State Water Resources Control Board (State Board) comments to the SSO Reduction Program, in particular General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2006-0003 DWQ (General Order). Our comments are based on our experience assisting public agencies comply with the provisions of the General Order and identification of areas for improvement. Please consider the following comments which are focused on the System Evaluation and Capacity Assurance Plan (SECAP) elements of Provision D.13(viii):

1. The first paragraph of this section requires the Enrollee to prepare and **implement** a capital improvement plan (CIP) to provide hydraulic capacity of key sanitary sewers under certain design conditions. Revisions to the current General Order should clarify what under the SECAP must be completed by the deadline, e.g., elements (a) through (d), the improvements under the CIP, or approval of the CIP, schedule, and adoption of rates to support its implementation.
2. Element (a) should be clarified for the following:
  - a. Whether the evaluation is to be completed by the deadline, or if it is a workplan that must be completed (e.g., "actions needed to evaluate...") by that time and that completion of this element proceeds according to the agency's workplan.
  - b. Clarify under what circumstances the evaluation is to be completed including if only when a system has a history of experiencing SSOs due to known or suspected hydraulic deficiencies. For example, if an agency has no history of SSOs due to hydraulic deficiencies and has no planned growth, clarify whether or not the evaluation must be completed.
  - c. Recognize that the agency will define what "key system components" are within the SSMP, possibly with justification in the SECAP document.
  - d. What acceptable means of estimating capacity are, e.g., hydraulic calculations or model.

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3. Element (c) should be revised if the intent of the General Order is for the SECAP to result in identification of a CIP and not a workplan and schedule for determining what CIPs are necessary. Under element (c) this can most easily be done by removing "The steps needed to establish" from the beginning of the element description.
4. Element (d) of the SECAP should recognize the rate setting process that all California public agencies must follow and the need to complete that process in order for the CIP to be implemented.

We look forward to an opportunity to review tentative changes to the General Order in the near future.

Sincerely,  
**ECO:LOGIC Engineering**



Neal T. Colwell, P.E.  
Supervising Engineer