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George W. Osborne – *Director*
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El Dorado Irrigation District

John P. Fraser – *Vice President*
Division 2

Harry J. Norris – *Director*
Division 5

Jim Abercrombie
General Manager

Thomas D. Cumpston
General Counsel

In Reply Refer To: EOL1009-269

October 19, 2009

Via E-mail
October 19, 2009

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

Subject: SSO Reduction Program Review and Update

El Dorado Irrigation District (District) appreciates the opportunity to comment on the State Water Board's review of the SSO WDR. We would like to submit the following items to be considered in determining how the WDR can be improved.

1. Private lateral spills.

We understand that the State is considering requiring agencies to report SSOs originating from private service laterals. At this time the District does not have the staffing levels for tracking and reporting these events. Due to budget limitations the District has been operating with a 20% staff reduction, including 30 layoffs, since late 2008. There is also concern that these private lateral SSOs, which are typically the smallest volume spills, could be used against us in performance appraisal of the Sewer System Management Plan.

2. Minimum SSO volume limit for reporting.

The District believes that there should be a lower volume limit for reporting spills. SSOs less than 25 gallons, that do not reach surface waters, pose little if any environmental or public health impact as most of these small spills are recovered.

3. Reporting time frame.

The District is in favor of changing reporting time limits as follows. Category 2 SSOs and Category 1 SSOs that do not reach surface waters, are not an immediate public health threat and do not need an urgent reporting time frame. These spills could be reported within 24 hours. We feel that Category 1 SSOs, greater than 1,000 gallons, which reach waters of the State, should be reported to the OES within the 2-hour reporting requirement as these are the real concern to public health and waterways.

4. The District believes that it would be prudent to allow full implementation and a period of experience with the SSO WDR General Order program before making changes. Not all SSMPs are due yet. Not all agencies have completed their SSMP even after the due date. More time should be allowed for development and implementation of agency SSMPs.

Sincerely,



Elizabeth Wells, P.E.
Engineering Division Manger

EW/pc

cc: Janice Ster, Assistant Engineer