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January 22, 2013

Russell Norman
SSO Reduction Program
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on Proposed Changes to Sanitary Sewer System (SSS) Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP)

Orange County Sanitation District (OCSD) appreciates the opportunity to comment on the recently released proposed modifications to the Sanitary Sewer System (SSS) Waste Discharge requirements (WDRs) Monitoring and Reporting Program (MRP). We acknowledge the challenges of improving the MRP and appreciate the State Water Resource Control Board's (SWRCB) effort to produce a document that establishes a framework for the reduction of sanitary sewer overflows (SSO).

The intention of the amendments to the MRP by the SWRCB was to better advance the SSO Program, therefore, reducing sewage spills and beach closures. However, the new, extensive record keeping requirements in the revised MRP will result in agency staff devoting their limited time and resources to simply compiling more documentation, which does not achieve the intent of the SSS WDR and the MRP. Instead, effort and resources should be put into properly preventing and responding to SSOs where it is most needed.

An additional area of concern is the new SSO Technical Report and the supporting Water Quality Monitoring Requirements language, which is required for any SSO in which 50,000 gallons or greater are not recovered from waters of the state. This requirement is burdensome and repetitive since our local Health Care Agency already provides water quality monitoring in our County. We ask to remove this requirement or at least include flexibility in the MRP so that we can use our local Health Care Agency's experience and knowledge to provide the monitoring and analysis service. In this economic climate, it is important to spend time and resources in ways that will truly benefit the environment.

While OCSD is supportive of the overall changes to the MRP, we request that the proposed above amendments to the MRP be taken into consideration. We appreciate the opportunity to provide comments on proposed changes to the MRP, and look forward to working with State Water Board staff in the future on issues related to the SSS WDR. If you would like any additional information, please contact me at (714) 593-7450. The staff contact regarding this issue is Dindo Carrillo, and he may be reached at (714) 593-7476.

James E. Colston
Environmental Compliance Manager

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