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In Reply Refer To: EOL0113-030

January 22, 2013

VIA E-MAIL:

[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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)

Dear Mr. Norman:

The El Dorado Irrigation District (District) appreciates the opportunity to comment on the State Water Resources Control Board's (State Water Board) proposed administrative changes to the Sanitary Sewer System (SSS) Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP).

The District's sanitary sewer system is comprised of four separately permitted collection systems. Combined, we have over 20,000 sewer service connections, over 560 miles of pipe and 64 lift stations owned, operated and maintained by the District.

The District has complied with all the requirements of the Sewer System Management Plan (SSMP) and we have seen significant improvement in reduced sanitary sewer overflows (SSOs) as a result of our concentrated efforts in the last 7 years and through the development of our SSMP. In order to reduce SSOs, we purchased new equipment and two VacCon trucks to clean pipelines, adjusted duties of our work force to allow more time for maintaining the conveyance system, and have implemented a significant repair and rehabilitation capital improvement program to repair failing pipelines and lift stations. We have spent several million dollars on repair of pipelines and lift stations since the adoption of the SSO WDR in 2006. We have implemented a fats, oils and grease (FOG) public outreach and inspection program, and improved our spill response procedures. Our agency has reduced SSOs by 80 percent since 2004. In 2012, we had a total of 11 SSOs (overwhelming majority are category 2). This resulted in less than two (2) SSOs per 100 miles of pipeline. We have also reduced the total volume of SSOs significantly.

We would like the State Water Board to take note that the District has had to implement significant reductions in our labor force and raise water and sewer rates to deal with reduction in revenue during these difficult economic times. The District recently implemented 5-year water and sewer rate increases. In addition, to reduce the operating budget and to reduce rate increases beyond the approved rate increase, the District laid off 45 people since mid 2008. The District has also eliminated several positions through attrition since 2008. The lay-offs combined with the position eliminations has resulted in a 30 percent staff reduction since mid 2008. The District is very concerned with the proposed changes to the SSS WDR MRP. We believe that the proposed changes will require additional staff time and operating funds that will not directly result in SSO reductions.

We are committed to the effective and appropriate implementation of the SSS WDR, and through our membership in the California Association of Sanitation Agencies (CASA), we have been an active partner with the State Water Resources Control Board (State Water Board) in facilitating understanding of, and compliance with, the order. The District supports CASA's comments on the proposed amendments to the MRP, and incorporates those comments by reference.

Our primary concern is that the proposed amendments constitute a broad and significant revision of the MRP, contrary to both State Water Board direction and prior representations to stakeholders regarding the cleanup nature of the amendment process. Though the current version of the MRP has been narrowed from the prior draft, the proposed revisions remain extensive. Many of the proposed changes do not fall within the limited scope of a MRP and create new policy or substantive requirements, which should only be imposed through amendments to the WDR itself. For example:

- The amount of information required for the 2-hour reporting requirement is significant, and in most cases entirely impractical for reporting entities;
- The new time limit of 120 days to amend a Sanitary Sewer Overflow (SSO) report inhibits the ability of entities to report the most accurate spill volumes possible after a complete investigation into the facts and circumstances surrounding an SSO;
- The new technical report and monitoring program required for all SSOs greater than 50,000 gallons is incredibly burdensome and is a significant new requirement;
- The new, extensive 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—to reduce SSOs;
- CalEMA should be the single point of contact for all reporting;
- Cat 1 SSO spills greater than 50,000 gallons require two reports: an SSO Technical Report and an Impact Assessment Report. One report is due 45 days after the SSO event. This is not enough time to document a SSO of that magnitude. Both reports should be combined, as combining the two reports will save agencies staff time and money.



- Photographs should not be a requirement. District field crews do not carry cameras. Field staff should be focusing all efforts to stop and clean up the spill, not take photographs while a spill is occurring.
- Water quality monitoring issues – agencies have little background or benchmarked data from streams, creeks, lakes, etc. within service area. Taking samples prior to an SSO event in order to have water quality benchmark data is a waste of rate-payer funds. Suggest language such as “sampling is required where background water quality is known”;
- De minimus events under 1 gallon should not be reportable;
- Certification that documents are available on enrollees web site should be sufficient as maintenance of links on CIWQS or other web sites not owned or controlled by the enrollee is an unreasonable burden.

The District supports some of the changes to the MRP originally proposed in early 2012. For example, we support the delineation of the two existing overflow categories into three, and clarification of the event-based approach to reporting. Nonetheless, the changes noted above, as well as many others, are outside the scope of the MRP amendment process and are inappropriate. We request that the proposed amendments to the MRP be revised consistent with the specific language recommendations submitted by CASA and our comments noted above.

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. Please contact me at (530) 642-4146 if you would like additional information regarding our comments.

Sincerely,



Elizabeth Wells, P.E.  
Engineering Manager

EW:lk

cc:

El Dorado Irrigation District

Tom McKinney, Operations Director

Brian Mueller, P.E., Engineering Director

Vickie Caulfield, Wastewater/Recycled Operations Manager