



## The City of Burlingame

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January 22, 2013

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

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

Dear Mr. Norman:

Burlingame 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). The City operates a sanitary sewer system that serves a population of approximately 28,000 in a 4.3 square mile service area. In addition, the City operates its own treatment plant and City's sewer system receives sewage from a portion of the Town of Hillsborough and from San Mateo County's Burlingame Hills Sewer District.

The City believes that it is very important to have our maintenance crews continue to concentrate on reducing SSO's by maintaining our system in the field and helping educating our customers. The City believes that continuously adding and making changes to the SSO reporting system will only create more paper work and does not help in reducing the SSOs or improve the water quality. We are committed to the effective and appropriate implementation of the SSS WDRs, and through our membership in the California Association of Sanitation Agencies (CASA) and California Water Environment Association (CWEA), we have been an active partner with the State Water Resources Control Board (State Water Board) in facilitating better understanding of, and compliance with the order. The City of Burlingame 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

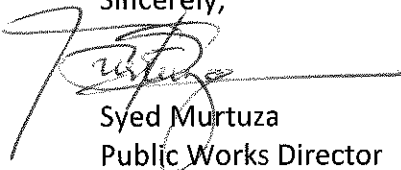
within the limited scope of an MRP and create new policy or substantive requirements, which should only be imposed through amendments to the WDR itself. For example:

- 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.

The City of Burlingame supports a number 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, clarification of the event-based approach to reporting, and clarification that agencies should only contact CalEMA for immediate 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.

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 Rob Mallick, Public Works Superintendent at (650) 558-7673 if you have any questions regarding this letter.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Syed Murtuza', with a long horizontal line extending to the right.

Syed Murtuza  
Public Works Director