

## Norman, Russell@Waterboards

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**From:** Geraldine Trivedi <Geraldine.Trivedi@redondo.org>  
**Sent:** Tuesday, January 22, 2013 3:18 PM  
**To:** Norman, Russell@Waterboards  
**Cc:** Mazin Azzawi; Mike Witzansky; Elaine Jeng; Tim Shea  
**Subject:** Comments on Proposed Changes to SSS WDR MRP

Russell,

Thank you for the opportunity to provide comments on the proposed changes to the SSS WDR MRP requirements. The City of Redondo Beach would like to submit the following comments for your consideration:

1. All requirements for notification and reporting are based on "becoming aware" of the SSO – City recommends this be changed to "upon verification" of a SSO. It would be irresponsible for the City to report a SSO based on a phone call from a party outside of City staff without verification of the SSO. Phone call complaints that could be associated with the wastewater system could also be associated with other systems (broken water main, water flushing of fire hydrant, approved potable water discharges) and verification of the SSO should be conducted before notification and reporting takes place to outside agencies.
2. Amended SSO Reports – The proposed MRP states that a certified SSO report can be amended no later than 120 days after certification – City recommends this be changed to 2 years after certification to capture the 2-year audit requirement time frame (in the event an error is found during the audit review, it can be corrected). The certifier should be able to correct the report when and if an error is identified.
3. The MRP requires that the SSMP documents and the audit are made available via an internet link to the public. The City recommends deleting the requirement to post the audit to a public web site. The City generates the audit in-house and includes a Strengths/Weaknesses/Opportunities/Threats (S.W.O.T.) evaluation that includes confidential information that can not be released to the public.
4. The MPR requires that enrollees document how they responded to all notifications of possible or actual SSOs, including complaints that **do not** result in a SSO. The City recommends deleting this requirement since complaints that **do not** result in a SSO can be numerous and enrollees shouldn't be required to keep all documentation on these incidents.

Thank you again for the opportunity to comment on the proposed MRP. Please contact me if you have any questions, or need further information.

Geraldine Trivedi, PE  
Associate Civil Engineer  
310-318-0661 x2036