**Public Comment** Sanitary Sewer System WDR Deadline: 5/13/11 by 12 noon

From:

Russell Norman

To:

commentietters@waterboards.ca.gov

Date:

4/6/2011 3:01 PM

Subject: Attachments: "Comment Letter – SSS WDRs Review & Update" —---> Fwd: Draft SSO V 2-Draft SSS WDR.pdf; 3-Draft SSS WDR\_Track Changes Format.pdf; 4-Dr

WDR MRP.pdf; 5-Draft SSS WDR MRP\_Track Changes Format.pdf; 6-Draft

port for SSS WDR.pdf

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>>> Brandi Outwin 4/6/2011 2:43 PM >>>

Thank you for the opportunity to review the tentative SSO WDR and associated MRP and Staff Report. We recognize the time and energy that have been invested into the drafting of this Order and appreciate the opportunity to provide our comments.

Overall, I believe that the tentative WDR is an improvement on the current SSO WDR. My only comment is that an additional applicability criteria should be added to section B.1 of the tentative WDR to include a requirement for any private or public entity that has overflowed more than 5,000 gallons of untreated or partially treated wastewater to a surface water of the state within 10 years regardless of the size of the sanitary sewer system to apply for adoption under the permit.

Additionally, in order to expedite feedback from the Los Angeles Regional Water Board on future correspondence regarding SSOs, we ask that my and Rebecca Chou's names be added to the distribution list.

Should you have any questions regarding this comment, please feel free to contact me via email or by phone at (213) 576-6664.

Many thanks-

Brandi Outwin-Beals, Unit Chief Municipal Permitting Unit California Regional Water Quality Control Board Los Angeles Region Phone: (213)576-6664 Fax: (213)576-6660 >>> Deborah Smith 3/23/2011 4:37 PM >>> Please review and comment informally as they request. Thanks!

Deborah Smith Chief Deputy Executive Officer CA Regional Water Quality Control Board Los Angeles Region phone 213-576-6609 fax 213-576-6625 <u>Dsmith@waterboards.ca.gov</u> >>> Vicky Whitney 3/22/2011 10:52 PM >>> Hello All:

The purpose of this email is to advise you of another opportunity for Regional Board participation as part of the staff team developing the Draft Sanitary Sewer Systems Waste Discharge Requirements (SS WDRs). The State Water Board will be issuing a Notice of Opportunity to Comment on the attached draft SSS WDRs later this week. The Public Notice and draft documents can be referenced at http://www.waterboards.ca.gov/water\_issues/programs/sso/index.shtml. The draft SSS WDRs are an update to Order# 2006-0003-DWQ. The public hearing/workshop and adoption hearing will be scheduled at a future date. Public comments on the attached draft SSS WDRs will be due by Noon on Friday, April 29th, 2011.

State Water Board staff have been working with Regional Water Board, SSO Reduction Program staff on the attached draft SSS WDRs since September 2009 through staff workshops (North Coast, San Francisco Bay, Central Coast, Central Valley and San Diego Water Boards participated) and comment letter solicitation (San Francisco Bay, Central Coast, and San Diego Water Boards responded).

Significant and potentially controversial changes proposed in the draft SSS WDRs include requiring mandatory reporting of private lateral spills when the enrollee becomes aware of them, requiring coverage of private collection systems in addition to publicly owned collection systems, and adopting the Order as a WDR versus as a hybrid WDR/NPDES permit. The attached staff report addresses these and additional issues staff considered in detail.

Regional Board comments do not need to be submitted by letter. Regional Board staff can contact Russell Norman (info below) by phone or email with questions or concern. Regional Board staff who participate on the staff team will help review and respond to comments, participate in the public hearing, and help develop the final draft permit for consideration by the State Board.

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Vicky