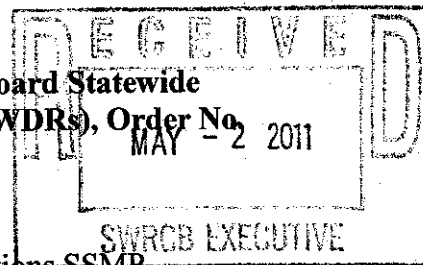


May 2, 2011

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

**Region 2's Comments on Proposed Revisions to the State Water Board Statewide Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDRs), Order No. 2006-0003-DWQ (Order)**



1. Provision 12 (i) Performance Targets and Program Modifications SSMP Element of the Order should be revised so that the Enrollee is required to *identify performance targets and generate* (as opposed to *illustrate* which is vague) *SSO trends for a minimum of three years, including SSO frequencies and volumes by cause*. The provision should also be revised to require that these trends be included and updated **annually** (not just routinely) in the SSMP. Additionally, based on the SSO trends generated annually, the Enrollee should be required to identify and incorporate program modifications to reduce SSOs over time. Region 2 believes this may be already implicit in the Order, but should be clarified. As currently written, the Enrollee is required "to incorporate program modifications to monitor progress in reducing SSOs over time" and "...program modifications must be reviewed (on) an annual basis..."
2. The Enrollee should be required to annually upload into CIWQS an electronic copy of the updated Performance Targets and Program Modifications SSMP Element. This would allow us to easily track and review Enrollee's progress in achieving performance targets and reducing SSOs over time.
3. For entities that own a combined sewer system and have also been issued a NPDES permit, the Order states that spill reporting requirements shall be incorporated in the entity's Monitoring and Reporting Program (MRP). The Order is not an appropriate venue to include such a requirement. The State Water Board should provide comments to incorporate such requirements during NPDES permit reissuance.
4. The State Water Board should develop statewide guidance and/or criteria for conducting SSMP audits. There is a need for providing a tool to Enrollees on how to adequately conduct such audits. The State Water Board could use the guidance developed by the Bay Area Clean Water Agencies in cooperation with the San Francisco Bay Regional Water Board as a starting point (see attached example checklist developed).
5. Provision D. 7 (v) of the Order requires enrollees to implement adequate sampling to determine the nature and impact of the release. This requirement is ambiguous and should be revised to specify, at a minimum, the following parameters be analyzed in receiving waters: dissolved oxygen, ammonia and indicator bacteria such as total coliform, fecal coliform or enterococcus or e.coli.
6. During the September 29, 2009, public meeting, the State Water Board posed the following question: "Should the Order be modified to require collection

system operator certification?" Region 2's response during the first round of comments to the Order was that it should require such certification. State Board staff has stated that it recommends not imposing such a requirement because of lack of data to fully support operator licensing and because it does not have the resources to develop and implement such a licensing program. The California Water Environment Association already offers Collection System Maintenance Certification by which many collection system operators currently are certified. There is no need for the State Water Board to dedicate additional resources to develop and implement a new certification program. Certification would provide a level of assurance that operators for an enrollee have an appropriate level of collection system O&M knowledge, skills, and abilities, and who are competent in safe work practices and who would understand and comply with the requirements of the Order. The Order should specify minimum grade level requirements to be held by all collection system workers, supervisors and managers. For disadvantaged communities, the State Water Board could coordinate with organizations like the Rural Community Assistance Corporation (RCAC) and the USDA Rural Development Program, who have in the past provided assistance to such communities in meeting wastewater and collection system regulatory requirements.

7. The following question was posed during the September 29, 2009 public meeting: "Should the SSO Order be modified to require reporting of sewage spills from municipal or privately owned wastewater treatment plants?" For consistency with requirements for collection systems, the Order should require reporting of sewage spills from municipal wastewater treatment plants. At the request from the State Water Board (directive from Tam Doduc), Region 2 has required this reporting since June 1, 2008.

**Sewer System Management Plan Annual Audit Report**  
DUE 3/15/11

Name of agency	City of Sunnyvale
Date of audit	March 08, 2011
Name of auditor	Ray Goebel, EOA, Inc. Dan Stevenson, City of Sunnyvale DPW, Sewer and Storm Program Manager
<b>System Overview</b>	
LF of gravity sewer mains	1,494,000 (283 miles)
LF of lower lateral	740,000 (140 miles) approx.
LF of force mains	9,800 (2 miles)
Total LF of all sewer lines	2,243,000 (425 miles)
Number of pump stations	5
Population served	140,050
Current average monthly single family residential sewer rate	\$29.23

**I. GOALS**

1. Are the goals stated in the SSMP still appropriate and accurate? **YES/NO**  
(circle one)
2. If you answered NO to question 1, describe content and schedule for updates.

**II. ORGANIZATION**

**REFERENCE MATERIAL**

- > Organization chart
- > Phone list

3. Is the SSMP up-to-date with agency organization and staffing contact information? **YES/NO**
4. If you answered NO to question 3, describe content and schedule for updates.  
\* Some changes/updates required. To be completed Mar/Apr 2011.

**III. OVERFLOW EMERGENCY RESPONSE PLAN**

**REFERENCE MATERIAL**

- > Data submitted to CIWQS
- > Service call data

Table 1. Annual SSO Statistics

	2008	2009	2010	2011	2012
Number of dry weather SSOs	2	9	13		
Number of wet weather SSOs	3	2	3		
Total number of SSOs	5	11	16		
Number of SSOs per 100 miles of sewer	.62	3	3.7		
Number of SSOs < 10 gallons *			2		
Number of SSOs < 100 gallons	4	3	5		
Number of SSOs 100 to 999 gallons	1	6	5		
Number of SSOs 1,000 to 9,999 gallons	0	2	3		
Number of SSOs >10,000 gallons	0	0	1		
Total volume of SSOs	750	7491	34,964		
Total volume recovered	100	4396	33,300		
Net volume of SSOs (total minus recovered)	650	3095	1,664		
Total volume conveyed	5000	4966	5066		
	MG	MG	MG		
Percent volume overflowed (100 x Net volume of SSOs / Total volume conveyed)	.013%	.062%	.033%		
SSOs caused by:					
Roots	X	9	9		
Grease	X	2	6		
Debris	X	n/a	1		
Pipe failure	n/a	n/a	n/a		
Pump station failure	n/a	n/a	n/a		
Capacity-limited pipe segment (no debris)	n/a	n/a	n/a		
Other	n/a	n/a	n/a		
Number of locations with more than one SSO in the past year	0	0	2		
Average response time - during business hours	17.5 mins.	23.2 mins.	14 mins.		
Average response time - after business hours	60 mins.	22 mins.	25 mins.		

\*2008 and 2009 included in <100 gallons

5. Does the SSMP contain an up-to-date version of your agency's Overflow Emergency Response Plan? YES/NO
  6. Considering the information in Table 1, is the Overflow Emergency Response Plan effective in handling SSOs? YES/NO
  7. If you answered NO to questions 5 and/or 6, describe content and schedule for necessary revisions and implementation.
- \* SSO Emergency Response Plan needs minor updating to be completed Mar/Apr 2011.

#### IV. FATS, OILS, AND GREASE (FOG) CONTROL PLAN

**REFERENCE MATERIAL**

- > List or map of FOG sources in service area
- > List or map of hotspots
- > Cleaning schedules
- > Restaurant inspection reports or summaries
- > Data submitted to CIWQS
- > Service call data

Table 2. FOG Control Statistics

	2008	2009	2010	2011	2012
Number of SSOs caused by FOG	3	2	6		
Number of FOG inspections completed	157	245	209		

8. Does the SSMP contain up-to-date information about your agency's FOG control program? YES / NO
9. Considering the information in Table 2, is the current FOG program effective in documenting and controlling FOG sources? YES / NO
10. If you answered NO to questions 8 and/or 9, describe content and schedule for necessary changes.

City has a FOG control program designed to control and mitigate SSOs related to FOG. The City's Pre-Treatment staff performed 209 inspections of FSEs and took 104 enforcement actions.

The Pretreatment Program provided public outreach and FSE inspections in response to an SSO event that occurred possibly as a result of FOG from a residential high density area. FSEs in the area were inspected and 350 bilingual BMP informational notices ("Sewer Monsters Do Exit" door hangers) were distributed to nearby high-density residential units.

The Senior Pretreatment Inspector was co-project manager for the BAPPG/CWEA Grease Interceptor Training that was held on March 30, 2010. Four Sunnyvale inspectors attended the all day training workshop. Additionally, the Senior Pretreatment Inspector and a Pretreatment Inspector attended a grease hauler's Workshop in November 2010 hosted by the City of San Jose.

#### V. LEGAL AUTHORITY

**REFERENCE MATERIAL**

- > Ordinances
- > Enforcement actions

11. Does the SSMP contain up-to-date information about your agency's legal authority? YES / NO
12. Does your agency have sufficient legal authority to control YES / NO

sewer use and maintenance?

13. If you answered NO to questions 11 and/or 12, describe content and schedule for necessary changes.

## VI. MEASURES AND ACTIVITIES

### a. COLLECTION SYSTEM MAPS

#### REFERENCE MATERIAL

> **Summary of Information included in mapping system**

14. Does the SSMP contain up-to-date information about your agency's maps?  YES /  NO

15. Are your agency's collection system maps complete, up-to-date, and sufficiently detailed?  YES /  NO

16. If you answered NO to questions 14 and/or 15, describe content and schedule for necessary changes.

\* Field crews utilize hard copy block maps. Need to identify process for transferring hand written corrections/revisions on block maps to City GIS layer.

### b. RESOURCES AND BUDGET

#### REFERENCE MATERIAL

> **Current Capital Improvement Plan (CIP)**  
> **Current operating budget**

17. Does the SSMP contain up-to-date information about your agency's resources and budget?  YES /  NO

18. Are your agency's resources and budget sufficient to support effective sewer system management?  YES /  NO

19. Does your agency's planning efforts support long-term goals?  YES /  NO

20. If you answered NO to questions 17, 18, and/or 19, describe content and schedule for necessary changes.

Answer to 18: In comparison to other sewer agencies, staffing and equipment levels are much lower in comparison to population, infrastructure to maintain, and area served. Sunnyvale currently does not have the staff or equipment to perform televising or mainline repairs. We currently contract all televising and most of the mainline repairs. Acquisition of a televising truck is planned for calendar year 2011. The City will continue to contract out the mainline repairs, which has been cost effective.

**c. PRIORITIZED PREVENTIVE MAINTENANCE**

REFERENCE MATERIAL

- > Cleaning schedules
- > List or map of hotspots
- > Work orders
- > Service call data
- > Customer feedback

**Table 3. Annual Blockage Statistics and Preventive Maintenance Activities**

	2008	2009	2010	2011	2012
Blockages in the past year	16	18	33		

21. Does the SSMP contain up-to-date information about your agency's preventive maintenance activities? YES/NO
22. Considering the information in Tables 1 - 3, are your agency's preventive maintenance activities sufficient and effective in reducing and preventing SSOs and blockages? YES/NO
23. If you answered NO to questions 22 and/or 23, describe content and schedule for necessary improvements.
- \* Not currently tracked

**d. SCHEDULED INSPECTIONS AND CONDITION ASSESSMENT**

REFERENCE MATERIAL

- > Inspection reports
- > Infiltration and Inflow (I/I) monitoring studies and reports
- > Pipe and manhole condition data

24. Does the SSMP contain up-to-date information about your agency's inspections and condition assessment? YES/NO
25. Are your agency's scheduled inspections and condition assessment system effective in locating, identifying, and addressing deficiencies? YES/NO
26. If you answered NO to questions 24 and/or 25, describe content and schedule for necessary changes.

Answer to 24: We currently do not perform any annual televising solely for condition assessment. A televising camera truck acquisition is planned for 2011 calendar year. February 2011 a Manhole Inspection Program was implemented to identify sewer to storm system manhole cross connections and other manhole deficiencies.

Answer to 25: System assessment will be more comprehensive with the acquisition of the televising unit and the implementation of the manhole inspection program.

**e. CONTINGENCY EQUIPMENT AND REPLACEMENT INVENTORIES**

**REFERENCE MATERIAL**

- > Funds spent on equipment and materials
- > Equipment and parts inventory

27. Does the SSMP contain up-to-date information about equipment and replacement inventories? **YES/NO**
28. Are contingency equipment and replacement parts sufficient to respond to emergencies and properly conduct regular maintenance? **YES/NO**
29. If you answered NO to questions 27 and/or 28, describe content and schedule for necessary arrangements.

Answer to 28: Sufficient inventory for smaller more common spills and repairs. Rely on outside contractor for larger more complex repairs and spill response. Planning to acquire additional emergency response equipment calendar year 2011.

**f. TRAINING**

**REFERENCE MATERIAL**

- > Employee training records

30. Does the SSMP contain up-to-date information about your agency's training expectations and programs? **YES/NO**
31. Do supervisors believe that their staff is sufficiently trained? **YES/NO**
32. Are staff satisfied with the training opportunities and support offered to them? **YES/NO**
33. If you answered NO to questions 30, 31, and/or 32, describe content and schedule for necessary improvements.
- \* SSMP will be updated with more detailed information on training and safety programs during Mar/Apr 2011 update.

**g. OUTREACH TO PLUMBERS AND BUILDING CONTRACTORS**

**REFERENCE MATERIAL**

- > Filers/maillings
- > Mailing lists

34. Does the SSMP contain up-to-date information about your agency's outreach to plumbers and building contractors? **YES/NO**



35. Has your agency conducted or participated in any outreach activities to plumbers and building contractors?

YES/NO

36. If you answered NO to questions 34 and/or 35, describe content and schedule for future activities.

\* SSMP to be updated Mar/Apr 2011 and will provide more detail for plumber/contractor outreach program. Mailing planned for 2011 calendar year.

### DESIGN AND CONSTRUCTION STANDARDS

#### REFERENCE MATERIAL

- > Design and construction standards
- > Ordinances

37. Does the SSMP contain up-to-date information about your agency's design and construction standards?

YES/NO

38. Are design and construction standards, as well as standards for inspection and testing of new and rehabilitated facilities sufficiently comprehensive and up-to-date?

YES/NO

39. If you answered NO to questions 37 and/or 38, describe content and schedule for necessary revisions.

### VII. CAPACITY MANAGEMENT

#### REFERENCE MATERIAL

- > Capacity assessment reports
- > CIP
- > SSO data

Table 4. SSOs Caused by Hydraulic Limitations

	2008	2009	2010	2011	2012
Number of SSOs caused by capacity limitations	0	0	0		

40. Does the SSMP contain up-to-date information about your agency's capacity assessment?

YES/NO

41. Has your agency completed a capacity assessment and identified and addressed any hydraulic deficiencies in the system?

YES/NO

If you answered NO to questions 40 and/or 41, describe content and schedule for necessary activities.

NOTE: Capacity assessment has been completed but not City wide. No hydraulic deficiencies have been noted at this time.

### VII. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

42. Does the SSMP contain up-to-date information about your agency's data collection and organization?  YES  NO

43. Is your agency's data collection and organization sufficient to evaluate the effectiveness of your SSMP?  YES  NO

44. If you answered NO to questions 42 and/or 43, describe content and schedule for necessary improvements.

\* SSMP to be updated Mar/Apr 2011 and will provide more detail.

#### VIII. SSMP AUDITS

45. Will this SSMP Audit be submitted with the Annual Report to the Regional Water Board by March 15?  YES  NO

#### IX. COMMUNICATION PROGRAM

##### REFERENCE MATERIAL

- > Mailings and mailing lists
- > Website
- > Other communication records such as newspaper ads, site postings, or other outreach
- > Customer feedback

46. Does the SSMP contain up-to-date information about your agency's public outreach activities?  YES  NO

47. Does the SSMP contain up-to-date information about your agency's communications with satellite and tributary agencies?  YES  NO

48. Has your agency effectively communicated with the public and other agencies about the SSMP, and addressed feedback?  YES  NO

49. If you answered NO to questions 46, 47, and/or 48, describe content and schedule for necessary improvements.

\* SSMP to be updated Mar/Apr 2011 and will be posted on the City web site after completion.