



TRIUNFO SANITATION DISTRICT

A PUBLIC AGENCY

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VIA EMAIL commentletters@waterboards.ca.gov

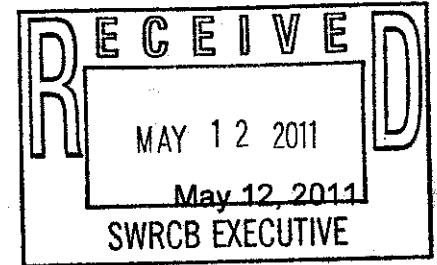
COMMENT LETTER - SSS WDR's REVIEW & UPDATE COMMENTS TO THE DRAFT STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

The Triunfo Sanitation District (TSD) has reviewed the draft Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDR) and appreciates this opportunity to comment.

The TSD service area includes approximately 50 square miles within the County of Ventura, servicing approximately 32,000 people with 12,200 sewer connections. Wastewater is treated at the Las Virgenes Municipal Water District's Tapia Water Reclamation Facility. Per the requirements established in Order No. 2006-003-DWQ TSD has developed and is implementing a Sanitary Sewer Management Plan since August 2009. TSD supports many of the modifications in the revised SSS but has several areas of concern that are discussed below.

The State Water Board noted in the Notice of Opportunity to Comment notice that it was interested in receiving comments particularly on whether the SSS WDR should be revised to be a two-tiered WDR and NPDES permit. Under a two-tiered WDR and NPDES permit system enrollees who have had at one SSO that has reached waters of the United States would be required to seek coverage under the NPDES permit. Enrollees who never had an SSO that reached waters of the United States would be required to seek coverage only under the SSO WDR. When an enrollee covered under a WDR has a sewer spill that enters waters of the United States they would be required to switch coverage from the WDR to a NPDES permit. The NPDES permit would include a prohibition against all SSO's to waters of the United States. Enrolling in a NPDES permit would subject TSD to potential increased cost with the potential for greater monetary penalties for violations. In addition violations of the spill notification procedure, reporting, and SSMP development provisions in the WDR would be open to third party lawsuits that are not allowed under the current WDR permit. With difficult

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



economic times and the public's low toleration for rate increases TSD is not in support of the two tier program which includes the NPDES Permit.

The proposed SSS WDR requires the reporting of Private Lateral Sewage Discharges (PLSD). In your staff report it states that based on data from the San Diego Regional Water Board and from a study of Orange County PLSD's occurring between 2002 through 2006 the total volume of sewage from PSL is about 5% of the total volume of sewage from SSOs. The cost and resources required to implement the PSL reporting requirement for such a relatively low volume of sewage spills from PSLs in TSD's opinion is not the best use of limited public funds.

The proposed SSS WDR prohibits the discharge of potable water with a chlorine residual for use in the clean-up of wastewater spills to any surface water body. TSD's current practice utilizes municipal potable water to wash down and cleanup SSOs on paved surfaces. When a sewage spill occurs the goal is to protect public health and the environment which requires clean-up of a wastewater spill as quickly as practical. Taking the time to dechlorinate potable water adds an additional step prolonging clean-up efforts. The chlorine residual contained in potable water is extremely low and quickly consumed when in contact with both wastewater and the atmosphere. TSD recommends language clarification to the SSS WDR to allow the use of potable water for cleaning efforts so long as efforts are taken to prevent the water from entering a surface water body.

TSD supports the streamlining of the spill notification requirements. Streamlining would be beneficial in allowing our staff to focus our efforts on stopping and the cleanup of SSO's instead of notifying several regulatory agencies.

Thank you for your consideration of our comments. TSD recognizes the challenges of developing a permit to regulate Sanitary Sewer Systems.

Please contact me at (805) 658-4602 for any additional information or if you have any questions,



DOUG ANDERS - DISTRICT MANAGER