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MS. Townsend -
This letter was
also FAXed to
you today -
4-27-11
Jim

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board

Subject: Comment Letter - SSS WDRs Review & Update

Dear Ms. Townsend:

My name is Jim Evangelist and I work for the City of San Bruno in the wastewater division as a line worker. I hold a Grade II Collection Certificate from CWEA and have worked for almost 10 years in that capacity. I am also shop steward for Teamster's Local #806 and have lived in San Bruno for 35 years. I would like to respond to the proposed new order # 2011-xxxx-DWQ from the State Water Resources Board.

I have read all the documents associated with this re-tooling of the Sanitary Sewer Systems Waste Discharge Requirements. I feel there is something missing to prod enrollees to reduce SSOs.

The disconnect as I see it comes down to this: currently, administrators and management are not involved as stakeholders in the success or failure of their programs to eliminate SSOs. They should be, but right now that dubious honor falls only to the residents and politicians.

These are my suggestions to change the above dynamic:

- 1) In addition to informing the State Water Board, notification to City elected officials should be mandatory of any Category I SSO.
- 2) Require management personnel to visit Category I SSO spill sites during an occurrence to take video and do reporting. Management also must evaluate the cleanup procedures and their effectiveness.
- 3) Even though the household lateral contribution to SSOs is significant ($\frac{1}{2}$ of our City's SSOs are generated by home laterals) our residents do not understand their role in the sewer system. In my city, at least, no outreach has been attempted to the public to increase their understanding and get them involved.
- 4) The State should encourage the development of a device that quickly and easily plugs a storm drain catch basin. The storm drain system would then act as a holding tank to be emptied and cleaned after the obstruction is broken.

In summary, because there is no structure for management to have accountability in the regulations as now written, the residents, businesses and politicians are left to know about problems with their collection system until they are levied with huge fines. Even then, most of the populace does not know about the fines.

Thank-you for giving me the opportunity to make these comments regarding #2011-xxxx-DWR. If you wish to discuss any points with me, please feel free to call or write.

Sincerely,



James J. Evangelist

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