



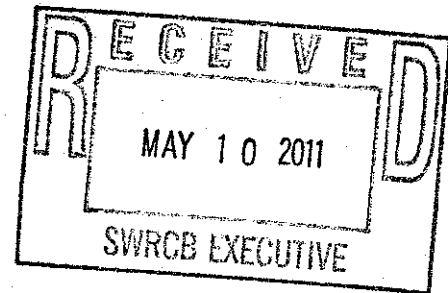
Engineering and Building  
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May 9, 2011

State Water Resources Control Board  
Attn: Ms. Jeanine Townsend, Clerk to the Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



**Re: City of Redondo Beach Comments Regarding:  
Proposed Waste Discharge Requirements for Sanitary Sewer Systems**

Honorable Board Members:

Thank you for the opportunity to comment on the proposed Waste Discharge Requirements (WDR) for Sanitary Sewer Systems (SSS). The City of Redondo Beach is committed to protecting public health and the environment. Since the adoption of the Sanitary Sewer Overflow (SSO) WDR in 2006, the City has invested significant resources on the wastewater system, including: hiring new staff; hiring consultants to conduct city-wide system evaluations; implementing new programs and projects; and increasing various wastewater system Operation and Maintenance activities per the findings in the evaluations.

We appreciate the efforts the State Water Board staff has taken regarding this important issue to date and believe the existing WDR has resulted in a reduced number of SSOs throughout the state, and within the City of Redondo Beach. The City request that the State Water Board allow for the programs and processes begun under the existing SSO WDR to be fully implemented before adoption of the significant changes listed below.

Many of the existing programs and projects involve capital improvements that take time to implement to improve the overall wastewater system performance. The City is currently in the process of increasing the existing sewer user fee rate to provide needed funding for the proposed wastewater system improvements. The City is also recruiting a new Senior wastewater engineer to ensure the implementation and smooth operation of the proposed enhanced city-wide sewer system.

We respectfully submit the following comments in regard to the proposed SSS WDR for your consideration:

- *Compliance with the revised SSS WDR would require a significant increase in City resources at a time when the City's budget is in crisis. Furthermore, it is unclear how the additional information that must be generated will be used by the Water Boards or that the efforts required under the revised permit will produce corresponding environmental or public health benefits.*
- *Several definitions in the SSS WDR require better definition. The differences between "waters of the state," "surface waters of the state," and "any waters of the state" are unclear and confusing. All terms are used in the SSS WDR, yet not all are defined, or are insufficiently defined. The definition for surface waters of the state is "any surface water, including saline waters, within the boundaries of the state. Surface waters do not include ground water." Does this include storm drain channels with ponded urban runoff? What about ponded urban runoff inside a gutter or storm drain?*

- The definition of "nuisance" should be included in the SSS WDR, versus including a reference to the California Water Code. This is a critical term and should be defined in the SSS WDR.
- The Prohibitions – "any SSO that results in a discharge of untreated or partially treated wastewater to surface water of the state is prohibited. This includes discharges to storm drains that are not fully captured and returned to the SSS or captured and otherwise appropriately disposed of if the storm drain is a tributary to a surface water of the state. Discharges to drainage channels if the drainage channel is a surface water of the state or tributary to a surface water of the state." Tributary needs to be defined. For example, does tributary to a surface water include the gutter, storm drain, 100 feet away from the surface water, or even one mile away from the surface water?
- The SSS WDR would require reporting of private sewer laterals spills, yet the City has no authority over these laterals. Therefore this requirement should be maintained as a voluntary reporting option.
- The SSS WDR would include a new prohibition on the use of chlorine during spill cleanups, including any potential chlorine residual in potable water, thus making it very difficult to wash down and fully clean up SSOs on roads and gutters, and in storm drains or ditches.
- "Required legal authority to limit flows to the SSS from connected sources including service laterals and satellite collection systems." Please clarify the intent of this statement – how would we regulate the amount of discharge? If the intent is to reduce the quantity of discharge to the treatment plant, how would this be accomplished?
- Please clarify the required legal authority to ban new connections – what is the intent of this requirement? New connections are approved for new developments and/or tenant improvements, etc.
- The City is opposed to the creation of a "hybrid" two-tiered approach to the regulation of SSS with both WDRs and NPDES permits. The City again requests that the State Water Board allow for the programs and process begun under the existing SSO WDR to be fully implemented before a major change such as this occurs. Full implementation of all programs and projects from the existing WDR are still in process, and full system performance benefits haven't been realized. A two-tiered permit program would result in additional regulatory complexities; subject the City to increased liability; and would not improve water quality or reduce SSOs. The SSS WDR does not authorize any SSOs to waters of the United States. As such, an NPDES permit is unnecessary.

Thank you for the opportunity to provide comments on the proposed SSS WDR. Should you have any questions, or require further information, please contact Associate Civil Engineer Geraldine Trivedi by e-mail at [Geraldine.Trivedi@redondo.org](mailto:Geraldine.Trivedi@redondo.org) or via telephone at (310) 318-0661, extension 2036.

Sincerely,



Steve Huang, Director

gtrivedi

CC: Bill Workman, City Manager  
Peter Grant, Assistant City Manager  
Mike Witzansky, Director of Public Works