

# Statewide General WDR for Sanitary Sewer Systems

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# What Happened in Sacramento

## May 2, 2006

### Wild and Woolly Board Meeting

- ✓ Item Not Heard until 1:30 after delays
- ✓ 30 or so presentations by City/Districts/Reps, Enviros, USEPA
- ✓ Final ruckus with time-table extension based upon signed MOA

### State Water Board adopted Order No. 2006-0003

- ✓ Statewide General WDR for Sanitary Sewer Systems
- ✓ Monitoring and Reporting Program (MRP)
- ✓ Fact Sheet

# What is in the WDR and MRP?

## WDR

- ❖ One Statewide Standard for Regulating Sanitary Sewers
- ❖ Prohibition of Certain SSOs
- ❖ Development of an SSMP
- ❖ Adoption of SSMP by Elected Board or Council
- ❖ Time Schedule for Compliance with WDR
- ❖ Requirements to Enroll
- ❖ Mandatory Enforcement Discretion

## MRP

- ❖ Requirement to Report **All** SSOs
- ❖ Development of an Online Database for reporting SSOs
- ❖ Time Schedule for Reporting SSOs (Category 1 & 2, and Private Lateral Spills)
- ❖ Required Reporting of No SSOs (for a given Month)
- ❖ Annual update of Questionnaire
- ❖ User Friendly

# What Do I Have to Do and When?

## Sewer System Management Plan Time Schedule

Task and Associated Section	Completion Date			
	Population > 100,000	Population between 100,000 and 10,000	Population between 10,000 and 2,500	Population < 2,500
Application for Permit Coverage <i>Section C</i>	6 months after WDRs Adoption			
Reporting Program <i>Section G</i>	6 months after WDRs Adoption <sup>1</sup>			
SSMP Development Plan and Schedule <i>No specific Section</i>	9 months after WDRs Adoption <sup>2</sup>	12 months after WDRs Adoption <sup>2</sup>	15 months after WDRs Adoption <sup>2</sup>	18 months after WDRs Adoption <sup>2</sup>
Goals and Organization Structure <i>Section D 13 (i) &amp; (ii)</i>	12 months after WDRs Adoption <sup>2</sup>		18 months after WDRs Adoption <sup>2</sup>	
Overflow Emergency Response Program <i>Section D 13 (vi)</i>	24 months after WDRs Adoption <sup>2</sup>	30 months after WDRs Adoption <sup>2</sup>	36 months after WDRs Adoption <sup>2</sup>	39 months after WDRs Adoption <sup>2</sup>
Legal Authority <i>Section D 13 (iii)</i>				
Operation and Maintenance Program <i>Section D 13 (iv)</i>				
Grease Control Program <i>Section D 13 (vii)</i>	36 months after WDRs Adoption	39 months after WDRs Adoption	48 months after WDRs Adoption	51 months after WDRs Adoption
Design and Performance <i>Section D 13 (v)</i>				
System Evaluation and Capacity Assurance Plan <i>Section D 13 (viii)</i>				
Final SSMP, incorporating all of the SSMP requirements <i>Section D 13</i>				

# What do the Superscripts Mean?

State Water Resources Control Board Order No. 2006-0003  
Statewide General WDR For Wastewater Collection Agencies

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1. In the event that by July 1, 2006 the Executive Director is able to execute a memorandum of agreement (MOA) with the California Water Environment Association (CWEA) or discharger representatives outlining a strategy and time schedule for CWEA or another entity to provide statewide training on the adopted monitoring program, SSO database electronic reporting, and SSMP development, consistent with this Order, then the schedule of Reporting Program Section G shall be replaced with the following schedule:

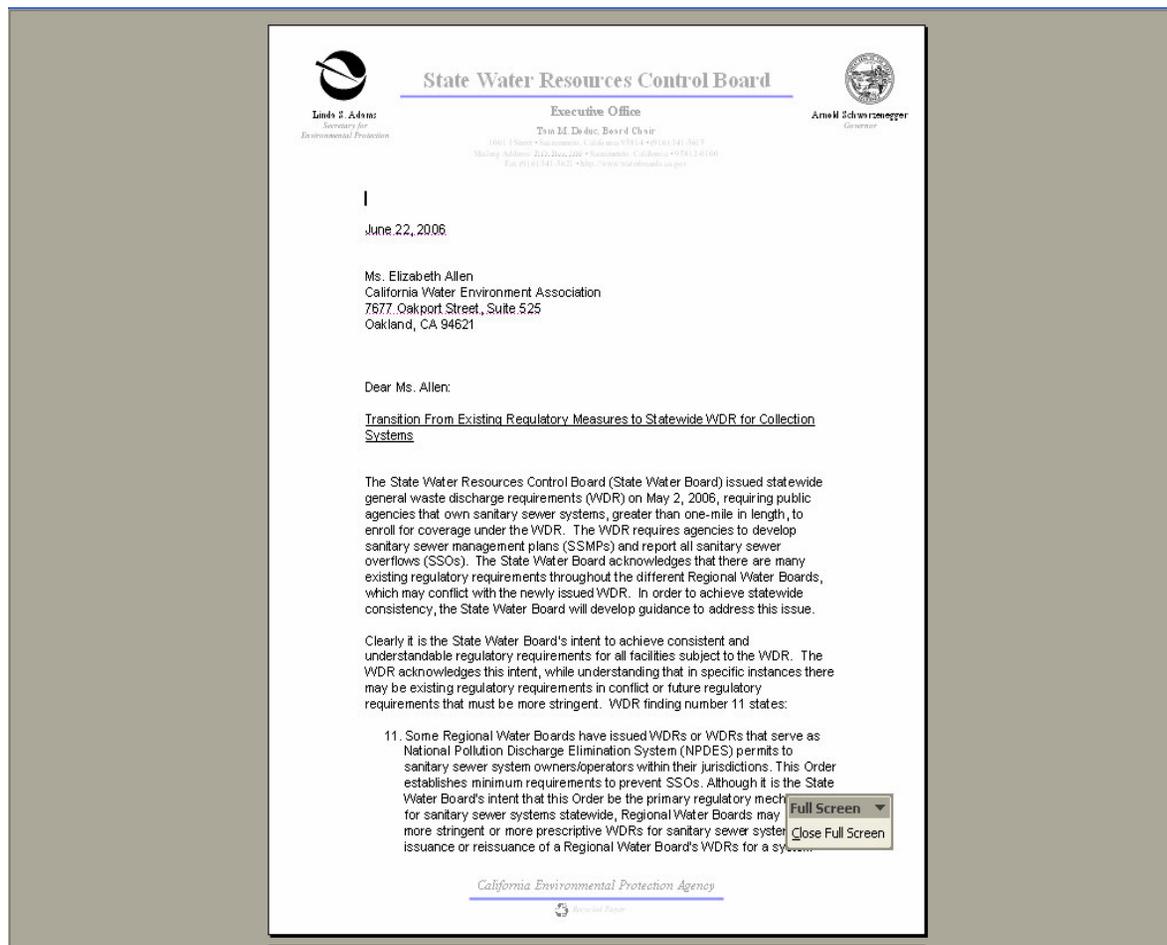
Reporting Program <i>Section G</i>	
Regional Boards 4, 8, and 9	8 months after WDRs Adoption
Regional Boards 1, 2, and 3	12 months after WDRs Adoption
Regional Boards 5, 6, and 7	16 months after WDRs Adoption

If this MOU is not executed by July 1, 2006, the reporting program time schedule will remain six (6) months for all regions and agency size categories.

2. In the event that the Executive Director executes the MOA identified in note 1 by July 1, 2006, then the deadline for this task shall be extended by six (6) months. The time schedule identified in the MOA must be consistent with the extended time schedule provided by this note. If the MOA is not executed by July 1, 2006, the six (6) month time extension will not be granted.

# Are the Water Boards Really Trying to Create Consistent Requirements?

Believe it or not, YES!



The screenshot shows an email interface with a header for the State Water Resources Control Board. The header includes the logo of Linda S. Adams, Executive Director, and the logo of Arnold Schwarzenegger, Governor. The email is dated June 22, 2006, and is addressed to Ms. Elizabeth Allen at the California Water Environment Association. The subject line is "Transition From Existing Regulatory Measures to Statewide WDR for Collection Systems". The body of the email discusses the State Water Board's issuance of statewide general waste discharge requirements (WDR) on May 2, 2006, and mentions that the board will develop guidance to address consistency with existing regional requirements. A list item 11 is partially visible, discussing Regional Water Boards' WDRs and their relationship to the National Pollution Discharge Elimination System (NPDES). A "Full Screen" button is visible in the bottom right corner of the email content area.

**State Water Resources Control Board**  
Executive Office  
Linda S. Adams, Executive Director  
Arnold Schwarzenegger, Governor

June 22, 2006

Ms. Elizabeth Allen  
California Water Environment Association  
7677 Oakport Street, Suite 525  
Oakland, CA 94621

Dear Ms. Allen:

Transition From Existing Regulatory Measures to Statewide WDR for Collection Systems

The State Water Resources Control Board (State Water Board) issued statewide general waste discharge requirements (WDR) on May 2, 2006, requiring public agencies that own sanitary sewer systems, greater than one-mile in length, to enroll for coverage under the WDR. The WDR requires agencies to develop sanitary sewer management plans (SSMPs) and report all sanitary sewer overflows (SSOs). The State Water Board acknowledges that there are many existing regulatory requirements throughout the different Regional Water Boards, which may conflict with the newly issued WDR. In order to achieve statewide consistency, the State Water Board will develop guidance to address this issue.

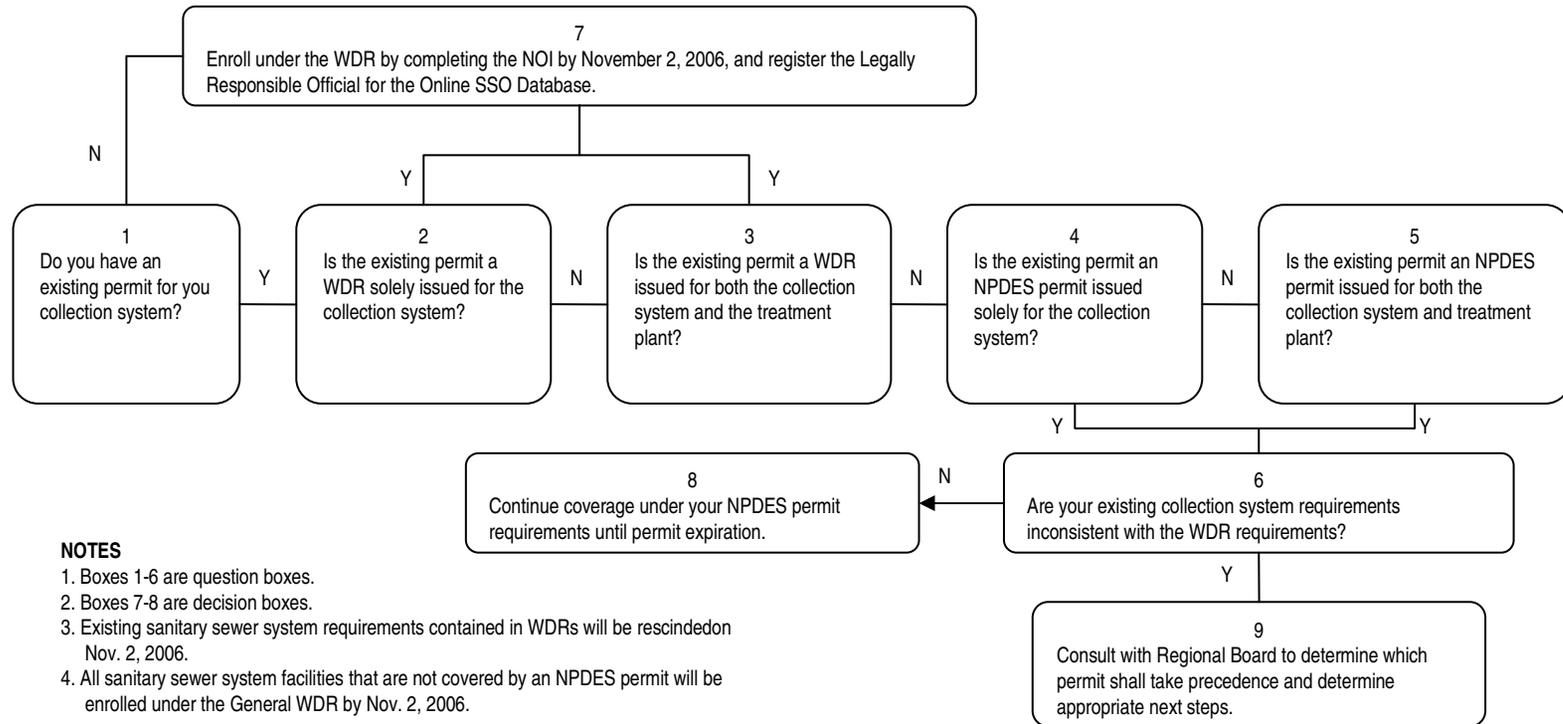
Clearly it is the State Water Board's intent to achieve consistent and understandable regulatory requirements for all facilities subject to the WDR. The WDR acknowledges this intent, while understanding that in specific instances there may be existing regulatory requirements in conflict or future regulatory requirements that must be more stringent. WDR finding number 11 states:

11. Some Regional Water Boards have issued WDRs or VWDRs that serve as National Pollution Discharge Elimination System (NPDES) permits to sanitary sewer system owners/operators within their jurisdictions. This Order establishes minimum requirements to prevent SSOs. Although it is the State Water Board's intent that this Order be the primary regulatory mechanism for sanitary sewer systems statewide, Regional Water Boards may issue more stringent or more prescriptive WDRs for sanitary sewer system issuance or reissuance of a Regional Water Board's WDRs for a system.

California Environmental Protection Agency

This letter is from the State Water Board's Executive Director to CWEA committing to create instructions on how the Regional Water Boards should implement this new WDR, given all of the existing regulatory requirements that currently exist for sanitary sewer systems.

# How Does This New WDR Interact With My Existing Permit



# So What Should I Do?



## Start Planning Now!

Read the WDR and MRP

Submit the NOI and LRO registration package

Develop a plan and schedule for compliance

Budget time and money to prepare SSMP and program enhancement

Use it as an excuse to improve your system