From:	Fanning, Valerie
To:	Norman, Russell@Waterboards
Cc:	Hampel, Julie
Subject:	FW: University of California, San Diego SSS Draft MRP Comments
Date:	Tuesday, October 02, 2012 4:36:25 PM

Hello Russell,

The University of California, San Diego would first like to thank you and staff for hosting the workshops for commenting on the draft SSS MRP. UC San Diego's SSMP was fully implemented in 2009. There has just been time for one audit period. We feel that it is too early to make so many changes to the MRP at this time. There is no evidence that the drastic and significant changes to the MRP will advance the cause of reducing SSOs, furthermore changing the MRP in this manner will only increase the compliance burden on enrollees without having any effective reductions in SSOs since these changes are administrative and record keeping only, with no actual improvements to structural issues that cause SSOs. With that said, we have the following additional comments:

Page 2 section 10: it is suggested that there be a volume associated with Category 1 spills. A five gallon spill to a storm drain channel should not be categorized as a high threat.

Page 5, A 10: it is suggested that these requirements only be for spills > 50,000 gallons

Page 6, 2.b.: it is recommended that modern electronic and telecommunications eliminate the need for the reporting person to be on scene.

Page 6, 2. h.: it is recommended that this section be removed.

Page 7, 3.a.: as in earlier comment on Category 1 classification, it needs to also be volume based. CalEMA does not need to spend time on spills less than 1,000 gallons.

Page 10, F.2. ii: it is recommended that this section be deleted.

Page 11, 3. a.: it is recommended that this section be deleted.

Page 17, 10. a.: it is recommended that this section be deleted.

Page 18, B: it is recommended that this section is only for spills >50,000 gallons.

Page 25 B, 1,a.b.c.: it is recommended that these sections be deleted.

Again, thank you for providing the opportunity to comment. If you have any questions or need clarification, please contact me .

Sincerely,
Valerie Fanning

Valerie Fanning
University of California, San Diego
Environment, Health & Safety
9500 Gilman Drive #0089
La Jolla, CA 92093-0089
Office: 858-534-9695
Fax: 858-534-1564
Cell: 858-583-3254
vfanning@ucsd.edu