



GARDEN GROVE SANITARY DISTRICT

11222 ACACIA PARKWAY, P.O. BOX 3070, GARDEN GROVE, CALIFORNIA 92842

January 25, 2006

State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, California 95814

Attention: Selica Potter
Acting Clerk to the Board

Subject: Comment Letter-1/19/06 Public Hearing for SSORP



SSO Hearing: 2/8/06

Honorable Members of the Board:

The Garden Grove Sanitary District would like to thank you for the opportunity to comment on the proposed Statewide General Waste Discharge Requirements.

The Garden Grove Sanitary District submitted its Sewer System Management Plan to the Santa Ana Regional Board on September 30, 2005. We have experienced the benefits of the Santa Ana Regional Board's program. The proposed Statewide Waste Discharge Requirements are very similar to the Santa Ana Regional Board's Waste Discharge requirements in most areas. In general, we support the proposed Statewide Waste Discharge Requirements with the following comments:

1. Under Regulatory Considerations on page 3 of 19, the Statewide Waste Discharge Requirements should state that sanitary sewer overflows are not subject to minimum mandatory penalties, but the California Water Code provides for penalties for unauthorized discharges, similar to paragraph 10.e of the preamble of Order No. R8-2002-0014 (page 5 of 18).
2. The Statewide Waste Discharge Requirements should acknowledge that containing sewage within the storm drain system with the use of the storm drain pipe system by blocking the drain pipes and recovering and cleaning up the spilled sewage, in order to prevent the sewage from being discharged to a surface water body, is not a violation of the Waste Discharge Requirements.

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3. Proper operation of the electronic reporting system should be ascertained prior to the start of the formal reporting process.
4. Add the definitions for Waters of the State and Surface Waters to the Statewide Waste Discharge Requirements, and to the Monitoring and Reporting Program document.

Thank you for consideration of these comments. If you have any questions regarding these comments, please contact the undersigned at (714) 741-5379.

Sincerely,



Garden Grove Sanitary District

Keith G. Jones

Director of Public Works

City of Garden Grove
Public Works Department

13802 Newhope Street
Garden Grove, CA 92843

Hitachi Hifax 46 Automatic Telecopier
(714) 741-5419

Please deliver the following material as soon as possible:

To: Zeki Royiran

From: Reith C. Jones

Subject: Comments on the draft statewide WDR's

FAX Number Sent To: (916) 241-5620

No. of Pages: 3 (Including cover page)

Confidential: Yes No

Urgent Reply Requested: Yes No

Comments:

Please notify operator immediately if not received properly - (714) 741-5375

Carolya
Operator

1/25/06
Date Sent

3:15
Time Sent