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Tuesday, January 22, 2013

Russell Norman <rnorman@waterboards.ca.gov>
SSO Reduction Program
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comments on Proposed Changes to Sanitary Sewer System (SSS) Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP)

Dear Mr. Norman:

On behalf of the Stege Sanitary District, we appreciate the opportunity to comment on the recently released proposed modifications to the Sanitary Sewer System (SSS) Waste Discharge requirements (WDRs) Monitoring and Reporting Program (MRP). We are committed to the effective and appropriate implementation of the SSS WDR, and through our membership in the California Association of Sanitation Agencies (CASA), we have been an active partner with the State Water Resources Control Board (State Water Board) in facilitating understanding of, and compliance with, the order. The Stege Sanitary District supports CASA's comments on the proposed amendments to the MRP, and incorporates those comments by reference.

The Stege Sanitary District is located on the east side of the San Francisco Bay Area and serves a population of about 33,000 in the communities of El Cerrito, Kensington, and the Richmond Annex. We operate and maintain a wastewater collection system of 148 miles of collection system main lines, 2 pump stations, and about 4400 manholes that is a satellite system to the East Bay Municipal Utility District (EBMUD) Wastewater Treatment Plant. We have taken significant efforts for over twenty years to reduce the number of SSOs in our system and are pleased to report we have reduced them from 11 per month to 1 per month during this period. We began implementation of a private sewer lateral inspection program upon the sale of homes in 2005 and since then over 25% of the laterals have been replaced or demonstrated compliance with our standards. We are in the process of working with the State and EPA in the initiation of a program which will require the implementation a broad spectrum of improvements and management processes in order to comply with a Federal order. Many of these changes are in keeping with the past requirements of the original WDR.

Our primary concern is that the proposed amendments constitute a broad and significant revision of the MRP, contrary to both State Water Board direction and prior representations to stakeholders regarding the cleanup nature of the amendment process. Though the current version of the MRP

has been narrowed from the prior draft, the proposed revisions remain extensive. Many of the proposed changes do not fall within the limited scope of an MRP and create new policy or substantive requirements, which should only be imposed through amendments to the WDR itself.

For example:

- The amount of information required for the 2-hour reporting requirement is significant, and in most cases entirely impractical for reporting entities;
- The new time limit of 120 days to amend a Sanitary Sewer Overflow (SSO) report inhibits the ability of entities to report the most accurate spill volumes possible after a complete investigation into the facts and circumstances surrounding an SSO;
- The new, extensive requirements in the revised MRP will result in agency staff devoting their limited time and resources to simply compiling more documentation, which does not achieve the intent of the SSS WDR and the MRP—to reduce SSOs.

The Stege Sanitary District supports a number of the changes to the MRP originally proposed in early 2012. For example, we support the delineation of the two existing overflow categories into three, clarification of the event-based approach to reporting, and clarification that agencies should only contact CalEMA for immediate reporting. Nonetheless, the changes noted above, as well as many others, are outside the scope of the MRP amendment process and are inappropriate. We request that the proposed amendments to the MRP be revised consistent with the specific language recommendations submitted by CASA.

We appreciate the opportunity to provide comments on proposed changes to the MRP, and look forward to working with State Water Board staff in the future on issues related to the SSS WDR.

If you have any questions or concerns, please feel free to contact me.

Very truly yours,
STEGE SANITARY DISTRICT



Rex Delizo

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District Manager