



January 22, 2013

Russell Norman  
SSO Reduction Program  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**SUBJECT: COMMENTS ON PROPOSED CHANGES TO THE MONITORING AND REPORTING PROGRAM (MRP) FOR WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS (SSS WDR)**

Dear Mr. Norman:

We have completed our review of the latest proposed modifications to the Monitoring and Reporting Program (MRP) for Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDRs) and believe that many of the proposed revisions are quite extensive and place an inordinate burden on the enrollee. One of our primary concerns regarding the proposed amendments is that it constitutes a much broader and significant revision of the MRP than originally directed by the SWRCB and contradicts past representations made to stakeholders. Some specific examples of our concern include:

- The amount of information required for the 2-hour reporting requirement is quite excessive and for most enrollees, entirely impractical or unattainable;
- Unless there is significant change in overflow volume, the continuous Category 1 SSO updates to CalEMA until certification serves no purpose;
- 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 technical report and monitoring program required for all SSOs greater than 50,000 gallons is incredibly burdensome and is a significant deviation from the original WDR;
- The proposed MRP will result in District staff devoting their limited time and resources to simply compiling more documentation and accelerate reporting, potentially diverts their attention away from addressing the overflow itself;
- It is difficult to see how most of these modifications will achieve the intent of the SSS WDRs and the MRP; i.e., reduce SSOs.

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Please have no doubt that we are totally committed to the protection of our environment and reduction of all SSOs and that we will utilize every available resource to achieve this end. Through our membership in the California Association of Sanitation Agencies (CASA), we have been an active partner with the SWRCB in facilitating understanding of, and compliance with, the order. WVSD supports CASA's comments on the proposed amendments to the MRP, and wish to formally support those comments.

We appreciate the opportunity to comment on the proposed changes to the MRP and look forward to working with the SWRCB staff in providing any additional information to help finalize this document. Please contact me at (408)385-3011 if you have any questions.

Sincerely,



Edward H. Oyama  
Director of Engineering and Operations

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