



GENERAL SERVICES DEPARTMENT

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January 16, 2013

Russell Norman  
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:

As the General Services Director of the City of Chico, I 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). The City operates over 280 miles of sanitary sewer pipelines, and a 12 Million Gallon per Day secondary process, wastewater treatment plant, providing sanitary sewer service to the citizens of Chico serving a connected population of approximately 85,000 persons. The City's existing Sanitary Sewer Management Plan (SSMP), which was adopted in July 2009, and revised in July 2011, has served the City well in reducing Sanitary Sewer Overflows (SSOs). It is the City's experience with the SSMP in place, that the existing SSS WDRs have proved successful in reducing the number and volume of SSO's that have the potential to reach surface water sources.

The City of Chico is 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 City of Chico supports CASA's comments on the proposed amendments to the MRP, and incorporates those comments by reference.

The City's 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:

1. The amount of information required for the 2-hour reporting requirement is significant, and in most cases entirely impractical for reporting entities;
2. 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;
3. The new technical report and monitoring program required for all SSOs greater than 50,000 gallons is incredibly burdensome and is a significant new requirement;
4. 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 City of Chico 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.

I 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. Please contact Kirby White, Public Works Manager at [kwhite@ci.chico.ca.us](mailto:kwhite@ci.chico.ca.us) if you would like additional information regarding our comments.

Sincerely,

  
Ruben Martinez  
General Services Director

cc: K. White, Public Works Manager  
M. Sulik, Wastewater Treatment Manager