



# Delta Diablo Sanitation District

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January 18, 2013

VIA ELECTRONIC MAIL ([Russell.Norman@waterboards.ca.gov](mailto:Russell.Norman@waterboards.ca.gov))

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

SUBJECT: COMMENTS ON PROPOSED CHANGES TO SANITARY SEWER SYSTEM  
WASTE DISCHARGE REQUIREMENTS MONITORING AND REPORTING  
PROGRAM

Mr. Norman:

Delta Diablo Sanitation District (District) appreciates the opportunity to provide comments to the State Water Resources Control Board (Water Board) regarding the proposed revisions to the Sanitary Sewer System (SSS) Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP). The District provides wastewater treatment for nearly 200,000 residents in the communities of Antioch, Bay Point and Pittsburg. In 2012 the District received the Platinum Peak Performance 8 award from the National Association of Clean Water Agencies for its history of compliance with its National Pollutant Discharge Elimination System permit for over eight consecutive years. The District's wastewater and conveyance systems include five pump stations, 57 miles of gravity sewers, and 14 miles of forcemains. The City of Antioch and the City of Pittsburg are satellite agencies to the District and all agencies work closely to share ideas for improved operations and to provide mutual aid support.

The District is committed to the effective and appropriate implementation of the SSS WDR, and through membership in the California Association of Sanitation Agencies (CASA), has been an active partner with the Water Board in facilitating understanding of, and compliance with, the order. The District supports CASA's comments on the proposed amendments to the MRP, and incorporates those comments by reference.

The District's primary concern is that the proposed amendments are extensive, extremely prescriptive, and will result in agency staff devoting their limited time and resources to a great deal of reporting and documentation. The new requirements do more to encourage future enforcement actions against an agency than the reduction of SSOs, which is the intent of the SSS WDR and the MRP.

The District supports a number of the changes to the MRP originally proposed in early 2012 including 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 the



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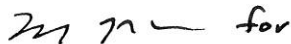
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California Emergency Management Agency for immediate reporting. Nonetheless, the changes noted above, as well as many others, are outside the scope of the MRP amendment process and are inappropriate. We request that the proposed amendments to the MRP be revised consistent with the specific language recommendations submitted by CASA.

The District appreciates the opportunity to provide comments on proposed changes to the MRP, and look forward to working with Water Board staff in the future on issues related to the SSS WDR. Please contact Amanda Roa at [amandar@ddsd.org](mailto:amandar@ddsd.org) if you would like additional information regarding our comments.

Sincerely,



Gary W. Darling  
General Manager

AWR/GWD:awr

cc: Michael Bakaldin, Deputy General Manager, DDS  
Mike Dixon, Maintenance Supervisor, DDS  
Dennis Laniohan, Operational Services Director, DDS  
Caroline Quinn, Engineering Services Director, DDS  
Amanda Roa, Environmental Compliance Engineer, DDS  
Bobbi Larson, Executive Director, California Association of Sanitation Agencies  
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