

## HUMPHREY CONSULTING

*January 21, 2013*

Mr. Russell Norman  
State Water Resources Control Board  
Division of Water Quality  
1001 I Street, 15th Floor  
Sacramento, CA 95814

*Transmitted Electronically*

Subject: Comments on Proposed Charges to Sewer System Waste Discharge Requirements (WDR)  
Monitoring and Reporting Program (MRP)

Dear Mr. Norman:

Humphrey Consulting has provided professional consulting services to twelve sanitary sewer collection system agencies across the State of California in the past two years, including professional services and management support for the operations of collection system operations, support for negotiations with regulatory agencies, and audits of agency SSMPs. Douglas Humphrey, owner of Humphrey Consulting, served as the General Manager and Operations Director for three medium and small sanitary districts in the San Francisco Bay Area during the previous twenty-two years. I was directly responsible for collection system operations for systems ranging in size from 25 miles to 300 miles, meeting regulatory and operational standards, managing SSO response, SSO reporting and loss programs. I helped organize and served as the first chair for four years for the BACWA Collection Systems Committee; in this capacity I worked closely with State staff and wastewater agency representatives on the original WDR and actively participated in workshops to help train and educate agencies regarding SSMP development.

As a consequence, I believe I am well-qualified to comment on the proposed changes to the MRP and hope that my experience and background can assist in finalizing the necessary changes to the current MRP revisions proposed by the State.

I have reviewed the most recent January 7, 2013 draft of the MRP and think that the State has done a very good job of dealing with the many comments and concerns expressed during the August 2012 workshops and the subsequent discussions and submittals by several statewide professional associations. I believe the current draft is, generally, a well-considered and important update to the regulation of collection systems across California. I support the revised MRP, with some modifications suggested by CASA and other changes noted below, and recommend that the State take steps to issue this draft and the follow-up changes to the CIWQS System so that agencies can begin implementing these requirements. I think that many of the revisions proposed by the State are warranted and create additional clarity to the expectations of the SWRCB with regard to SSO management and reporting. These changes will push collection systems to improve their operations in a positive and beneficial way, resulting in improvements to SSO management and response. Most of the changes and additions to the MRP should not significantly expand field work efforts and will provide additional liability protections for agencies that may express a contrary opinion. These changes are already best management practices for highly performing agencies across the state and will not impose a new significant work burden on an agency.

The California Association of Sanitation Agencies (CASA) has put a significant effort into review, analysis, and comment on the proposed MRP revisions. I support CASA's comments with the following exceptions:

1. Page 1, Table 1 - There is no need to remove the table on page 1 of Attachment A.
2. Page 5, section C.5 – There is no need to remove this section, technical reports for SSOs greater than 50,000 gallons.
3. Page 9, sections C.8ii through C.8v – these sections do not need to be removed. SSMP availability and SSMP audit availability do not place an undue burden on agencies and are a good idea.
4. Page 10, section E – No need to remove. Photographic records, for example, are a good idea and should be added. Similarly, records documenting changes to SSMPs are

I want to thank you and your staff for the significant effort expended over the past several years in your review and evaluation of the effectiveness of the original WDR. I believe that a revised MRP will provide greater clarity to the expectations and documentation expected by the Enforcement Branch of the SWRCB. This clarity should assist agencies in enhancing their understanding of the State regulations. I hope that my comments and observations will assist the Board staff in finalizing the current MRP.

Should you have questions or require further information on our comments and observations, please contact us at 510-750-6092 or by email at [dcherryhum@aol.com](mailto:dcherryhum@aol.com).

Very truly yours,

Douglas C. Humphrey

Humphrey Consulting