



CVCWA

CENTRAL VALLEY CLEAN WATER ASSOCIATION

Formerly the Central Valley Wastewater Manager's Association

Representing Over Forty Wastewater Agencies

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JACQUE McCALL – SECRETARY, VACAVILLE MICHAEL BERKLICH – TREASURER, TURLOCK

January 24, 2006

Tam Doduc, Chair, and Members
State Water Resources Control Board
P.O. Box 100
1001 I Street, 24th Floor
Sacramento, CA 95814

commentletters@waterboards.ca.gov

**SUBJECT: Comment Letter – 2/8/06 Public Hearing for SSORP
General/Technical Comments**

Dear Chair Doduc and Members:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to provide comments on the proposed Statewide General Waste Discharge Requirements (WDR) for Wastewater Collection System Agencies. CVCWA consists of 47 local public agencies located within the Central Valley Region that provide wastewater collection, treatment and water recycling services to millions of Central Valley residents and businesses. The majority of our members are what you would consider small communities and a number of them are in the smallest population category proposed in the new requirements. All of our members operate wastewater collections systems and are very interested in the proposed WDR.

In general, CVCWA supports the concept of a state wide WDR for collection systems. We realize that it is in the best interests of the public to implement a program that will protect the public health and the environment and to protect one of the largest infrastructure systems in the State. However, we do have several general and technical comments on the draft permit. They are summarized as follows:

Application/Yearly Permit Fees

No mention was made in the proposed WDR of fees to be paid by collection system operators to either apply for the WDR or to be paid on a yearly basis as are done with NPDES Permits and Wastewater Treatment WDRs. The vast majority of collection systems in the State of California already have a NPDES or WDR permit and pay fees to the State for administration of those permits. Also, some NPDES permits already have requirements for maintenance of collection systems in them and yearly fees are paid to the State of California for administration of those permits. Accordingly, if it is decided that the State is to charge a fee for the Collection System WDR, credit should be given to those agencies that already pay a fee to the State. Fees should only be charged to agencies that do not currently pay a fee.

Double Reporting

At the current time all the Regional Boards in the State have adopted policies for reporting sewer system overflows (SSOs) to their offices. This proposed WDR institutes a centralized reporting system for every SSO in the State. Without any changes in the policies of the Regional Boards, collection system agencies will be double reporting every SSO. Direction needs to be given, in the proposed WDR, to the Regional Boards to revise their reporting policies to utilize the statewide system. Without direction, CVCWA feels that at the Central Valley Regional Board will continue to require verbal and written reporting to them, thus double reporting.

Registered Professionals

Provision 12 (page 9 of 19) of the proposed WDR appears to require that all engineering and geologic evaluations and judgments contained in the proposed SSMPs be stamped and signed by appropriately qualified professionals. However the last sentence of Provision 12 states that the entire SSMP shall be prepared by and signed & stamped by a professional person. As proposed, the SSMP contains eleven (11) sections, only a few of which will require engineering and geologic evaluations. For instance, why should a registered engineer sign and stamp the collection system use ordinance or service agreements. We suggest that the last sentence be revised as follows:

“The portions of the SSMP containing those evaluations and judgments The SSMP shall be prepared by and under the direction of appropriately.....”

Certification

Provision 14 (page 14 of 19) of the proposed WDR requires that each Enrollee certify compliance with the order and present the SSMP to its governing board. Provision 15 then lists a time schedule for eleven (11) tasks to be completed with varying time lines for their completion. It is unclear if the Enrollee is to certify each task as it is completed and present each task to its governing board separately, or if the entire SSMP is to be presented to the

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General Comments

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governing board upon completion and then certified to the State. To minimize the amount of work for both the applicant and for State Employees processing the permit, we recommend that the certification be completed as the final step of the SSMP.

Application

Section B, of the WDR requires all public agencies that currently operate sanitary sewer systems to apply for coverage under the WDR. It is unclear to which agency that application will be made (State Board or Regional Boards) and which agency will process that application. Furthermore, it is unclear if an actual WDR will be issued by the State and sent back to that agency as happens with NPDES Permits and Wastewater Treatment WDRs. We recommend that the time schedule for completion of the eleven tasks in the WDR begin when an approved WDR is received by the applicant, thus reflecting the time it may take for the State to accept, process and issue a formal WDR.

Thank you for your consideration of our comments.

Sincerely,



Warren Tellefson
Executive Officer

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