



California Regional Water Quality Control Board

San Francisco Bay Region

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Secretary for
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Protection

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Arnold Schwarzenegger
Governor

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NOV 15 2004

TO: Sewer System Authorities (attached list)

SUBJECT: New Requirements for Reporting of Sanitary Sewer Overflows

This letter is to notify you, as a Sewer System Authority, that beginning December 1, 2004, there will be new requirements for reporting of sanitary sewer overflows (SSO) that apply to all Sewer System Authorities in this region. In summary, you are required to:

- 1) electronically report SSOs that occur within a set time frame to the Water Board, and
- 2) annually report all SSOs.

These reporting requirements are described in the attached Monitoring and Reporting Program Requirements. Failure to accurately report will subject you to monetary liabilities that may be imposed by the Water Board. The following provides some background and further details on the requirements and liabilities.

Background

This requirement is the result of a collaborative effort between the Bay Area Clean Water Agencies (BACWA) and the Water Board to reduce and prevent sanitary sewer overflows. Over the past year, BACWA and Water Board staff held numerous meetings and six workshops to develop the content of a comprehensive SSO program. This program is comprised of two components: 1) electronic reporting of SSOs; and, 2) development and implementation of Sanitary Sewer Management Plans (SSMPs). While the requirement for electronic SSO reporting begins December 1, 2004, the guidance document for SSMP preparation is still under development. We are also in the process of developing reporting requirements for activities related to development and implementation of SSMPs. These reporting requirements will be a part of the annual reports, and you will be notified of them at a later date. If you are interested in participating in finalizing the SSMP guidance or the reporting requirements, please contact Ann Powell of the Water Board.

Registration

The first step to electronic reporting is registration at: https://www.r2esmr.net/sso_login2.asp. Prior to reporting SSOs, you will need to go online and complete a "Collection System Questionnaire" to register your agency in the program. After registration, we will e-mail you a username and password. Each agency can register only once, and will be provided only one username and password. You may share this username and password with any authorized user within your agency who has responsibility for reporting SSOs. You do not need to register again if you have already registered as part of the pilot testing of this reporting system.

Annual Reports

The first annual report is due March 15, 2006, and should cover 13 months from December 1, 2004, through December 31, 2005. Subsequent annual reports are due March 15th, and should contain information for the preceding 12-month calendar year. Please refer to the attached document, Sanitary Sewer Overflow Monitoring and Reporting Program Requirements for Sewer System Authorities, for detail on reporting SSO information in the annual report.

Applicability to NPDES Permitted Facilities

For Publicly Owned Treatment Works whose discharges are regulated in NPDES permits, and who also operate sanitary sewer systems, the reporting requirements for SSOs specified in your Permit's Self-Monitoring Program (SMP) are still in effect for SSOs that occur within the treatment plant facility boundaries. For SSOs that occur in the collection system upstream of the treatment plant, the SSO reporting requirements specified in this letter replace those in the SMP.

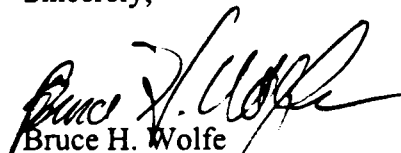
Basis for Requirement and Liabilities

Because SSOs are a threat to water quality, you should be aware that this letter establishes formal requirements for technical information pursuant to California Water Code Section 13267. Failure to respond, late response, or incomplete response may subject you to civil liability imposed by the Water Board to a maximum of \$1,000 per day. Any revisions of the request set forth must be confirmed in writing by Water Board staff.

Questions

If your agency needs assistance registering or with other aspects of electronic reporting, please contact Johnson Lam at jlam@waterboards.ca.gov or (510) 622-2373. For questions about program requirements or SSMPs, please contact Ann M. Powell at apowell@waterboards.ca.gov or (510) 622-2474.

Sincerely,


Bruce H. Wolfe
Executive Officer

Attachments:

- Sanitary Sewer Authorities Mailing List
- Sanitary Sewer Overflow Monitoring and Reporting Program Requirements for Sewer System Authorities