



ORANGE COUNTY SANITATION DISTRICT

We protect public health and the environment by providing effective wastewater collection, treatment, and recycling.

April 18, 2011

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Santa Ana Regional Water Quality Control Board
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SUBJECT: Orange County MS4 Water Quality Management Plan (WQMP)

The Orange County Sanitation District (OCSD) is submitting this letter to request changes to the Orange County MS4 Water Quality Management Plan (WQMP) which you will be considering for approval on April 22, 2011. Over the past year, OCSD has been commenting to the Technical Advisory Group about infiltration to the sanitary sewer from the proposed Harvest and Use BMPs. As you are aware, large amounts of stormwater can enter the sanitary sewer by way of inflow and infiltration (I&I) during heavy rain events. A minor consequence of I&I flows is increased operating costs to the downstream treatment facilities. At the opposite extreme, I&I flows can overload the capacity of the collection system and lead to sewer system overflows. The practice of Harvest and Use BMPs can possibly have serious consequences for both local sewer agencies as well as a regional agency such as OCSD.

Although there is language in the *Technical Guidance Document (TGD)* that addresses some of the concerns, OCSD would like to see changes to the following sections:

- Section 2.4.1. Project Performance Criteria, Subsection 2.4.2.4. LID Feasibility Criteria (Pg 2-33)
- Section 4.4. Harvest and Use BMP (Pg 4-4 to 4-5)
- Section 6.2. Non-Structural Measures, N13 (SD-31) Housekeeping of Loading Docks (Pg 6-3)

The attached table summarizes the suggested revisions. It is OCSD's understanding that the Orange County Public Works is considering adding an appendix (Appendix XVII) so that OCSD may include an I&I map for reference. OCSD appreciates the opportunity to contribute to the WQMP topic by participating in the review of this significant regulatory guide.

If there are any questions about the suggested revisions, please contact Merrill Seiler at 714-593-7436 or Jerry Evangelista at 714-593-7419.

Jim Colston
Environmental Compliance Manager

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County of Orange



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ATTACHMENT – OCSD’s Suggested Revisions to Technical Guidance Document for WQMP

Subsection	Suggested Revisions (revised language in italics)
<p>2.4.2.4. LID Feasibility Criteria (p. 2-33)</p>	<p>Infiltration Feasibility Stormwater infiltration is infeasible if any of the following conditions apply:</p> <ul style="list-style-type: none"> (Last bullet p. 2-33) If there is substantial evidence that infiltration from the project would result in increase in inflow and infiltration (I&I) to the sanitary sewer that cannot be sufficiently mitigated, and it is beyond the reasonable scope of the project to rehabilitate the sanitary sewer to mitigate for I&I. It is anticipated that maps will be made available to identify areas of the sanitary sewer system where high I&I has been observed, however these maps shall be used for reference purposes only. <i>See Appendix XVII for a general countywide map of areas susceptible to high I&I. This map should be used for reference purposes, as more up-to-date maps should be available through the local sewer agency. All infiltration activities should be coordinated with the local sewer agency to ensure project drainage plans are protective of sewer hydraulic capacity. It is recommended that coordination be initiated as early as possible during the Preliminary/Conceptual WQMP development process.</i>
<p>4.4. Harvest and Use BMP (pp. 4-3 to 4-4)</p>	<p>Harvest and Use (aka Rainwater Harvesting) BMPs are LID BMPs that capture and store stormwater runoff for later use. These BMPs are engineered to store a specified volume of water and have no design surface discharge until this volume is exceeded. The utilization of captured water used should comply with codes and regulations and should not result in runoff to storm drains, or receiving waters (except indirectly via the sanitary sewer/municipal wastewater treatment system). Potential uses of captured water may include irrigation demand, indoor non-potable demand, industrial process water demand, or other demands. Appendix XIV.3 provides fact sheets for two types of harvest and use configurations.</p>
<p>6.2. Non-Structural Measures, N13 (SD-31) Housekeeping of Loading Docks (p. 6-3)</p>	<p>Loading docks typically found at large retail and warehouse-type commercial and industrial facilities should be kept in a clean and orderly condition through a regular program of sweeping and litter control and immediate cleanup of spills and broken containers. Cleanup procedures should minimize or eliminate the use of water if plumbed to the storm sewer. If wash water is used, it must be disposed of in an approved manner and not discharged to the storm drain system. If there are no other alternatives, discharge of non-stormwater flow to the sanitary sewer may be considered only if allowed by the local sewerage agency through a permitted connection. <i>must be at an acceptable discharge point such as a cleanout, oil/water separator, grease interceptor, or industrial sewer connection. All sewer discharges shall be in accordance with the Orange County Sanitation District’s Wastewater Discharge Regulations and/or Washwater Disposal Guidelines.</i></p>