



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON CHAN
Chief Engineer and General Manager

October 2, 2012

File No. 31-370.04-4A

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

Dear Mr. Norman:

**Comments on Proposed Changes to Sanitary Sewer System (SSS)
Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP)**

The Sanitation Districts of Los Angeles County (Sanitation Districts) own and operate a collection system that consists of 1400 miles of sewer and 52 pumping plants. As enrollees of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, we are impacted by changes to the MRP. On August 30, 2012, Sanitation Districts' staff attended the Southern California Data Review Committee meeting convened by SSO Reduction Program staff to discuss and hear comments on proposed changes to the MRP. We appreciate State Board's staff time and effort to hear comments and provide insight as to why revisions are necessary. At that time, Sanitation Districts' staff provided oral comments, many of which have been included in the Comment Summaries emailed to meeting participants on September 17, 2012 and many of which are also being included in the California Association of Sanitation Agencies (CASA) and Tri-Tac comment letter. The Sanitation Districts are in agreement with the CASA/Tri-Tac comment letter and request that the State Board consider and revise the draft MRP per the recommended revisions.

The Sanitation Districts are supportive of the proposed revision to allow "event" based spill reporting, of the addition of a new spill category and splitting Category 1 spills into two categories. Although we understand some of the concerns State Board staff are trying to address with the proposed revisions, the Sanitation Districts believe many of the increased notification, monitoring, reporting and record keeping requirements in the draft MRP and Appendices 1, 2 and 3 will create a significant burden on enrollees and will not result in a reduction of the number of SSOs. We look forward to reviewing a revised draft MRP prior to its finalization that incorporates the requested revisions. If you have any questions, please contact the undersigned at (310) 638-1161, extension 6803.

Very truly yours,

Grace Robinson Chan

Martha Tremblay
Section Head
Wastewater Collection Systems