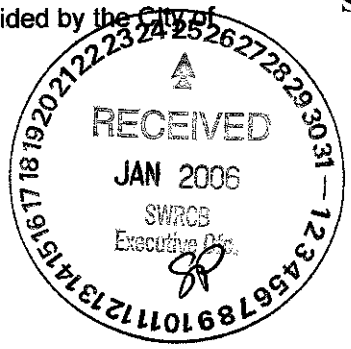


From: "Rick Batha" <rbatha@cityofsacramento.org>
To: <commentletters@waterboards.ca.gov>
Date: Wed, Jan 25, 2006 5:00 PM
Subject: Subject: Draft Statewide General Waste Discharge Requirements for Sewage Collection System Agencies

Thank you for providing the opportunity to comment on the Draft WDRs for collection systems. Attached are comments provided by the City of Sacramento Department of Utilities.

SSO Hearing: 2/8/06

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**Subject: Draft Statewide General Waste Discharge Requirements for Sewage
Collection System Agencies**

General Comment on the scope of this proposed permit – Please note that the City of Sacramento has an NPDES permit for its combined sewer system. The provisions of the WDR, the Monitoring and Reporting Plan, and the Fact Sheet do not explicitly exclude the inclusion of a combined system. Please clarify. The City would prefer that its CSS be explicitly excluded from these provisions. It has many features that are not common to typical sanitary systems, including the nature of its outflows, which flow back into its own system and are not routed toward a waterway but rather a treatment plant. In addition, the CSS outflows are currently regulated by NPDES permit, so it is will be confusing for the City and its regulators to sort out the duplicative and conflicting requirements.

Affirmative Design Provision - We request that this provision be re-inserted into the regulation. There will always be SSOs due to some event even if the system is perfectly engineered and maintained, since all systems are designed and built to a defined standard. These standards, such as a 10-year return storm, are adopted industry standards that balance cost with a reasonable level of performance. In addition, there are events in the real world beyond the control of the discharger that cause outflows; for example: acts of vandalism, disturbance of the system by contractors and the public, or extreme acts of nature (earthquake, etc.) that would clearly be uncontrollable. By including this provision, there would be an implicit acknowledgement of the limits of performance standards in the real world and appropriately focus the regulators and the dischargers on the SSOs that are truly manageable.

Comment regarding Cost – We respectfully disagree with the statement that the average cost listed of approximately \$6 per month is a manageable cost to the average ratepayer and we wonder if this is a true projection of the cost of this program. To the City of Sacramento, this equates to a 50% rate increase in the collection system bill, which is significant and will cause an outcry from both the general public and the decision makers. Our experience is that hundreds of ratepayers register protests over 6% increases, let alone a 50% increase. Also, this projected rate increase is in addition to the cost of other state-imposed mandates that are becoming more prevalent, such as heightened requirements for effluent treatment.

WDR Provision Number 7, Comment iv – Recommend change from “system modifications to prevent another SSO...” to “*system or maintenance modifications to prevent another SSO...*”

WDR Provision Number 7, Comment v – Recommend that this requirement to provide “adequate sampling... of the release”, be qualified or deleted. The City captures and disposes of most of its SSOs with the use of vacuum trucks which are not equipped to

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perform sampling. Since time is of the essence to evacuate affected portions of the storm system, determine the problem, and resolve it, requiring sampling would significantly decrease response efficiency, potentially exacerbating the threat to public health and the environment. Furthermore, the nature of most of the spills is well-known – household sewage. Therefore, only in the case of unique or significant spills would sampling be a needed step.

WDR Provision 10, General comment - This provision requires that the Enrollee provide adequate capacity for dry and wet weather flow as a blanket statement for the entire system. This is really a goal and does not include a transition period towards its achievement. For clarification, this provision should reference the System Evaluation and Capacity Assurance Plan defined elsewhere.

WDR Provision 13, iv (c) — This element of the rehabilitation plan stipulates use of regular TV inspections of manholes and sewer pipes, etc. General comment: First, TV inspection of manholes is not the method of choice; it is much preferred to simply visually inspect the manhole and assess condition; and, for large pipes, TV inspection is problematic due to depth of flow and lighting problems to obtain a clear picture in a large space. Second, periodic TV inspection of a collection system is very expensive for large systems. Most asset management programs apply other methods to assess condition to supplement strategic use of TV inspection, due to cost and feasibility.

WDR Provision 13, iv (c) – We are unclear of the meaning of the last sentence, *“Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets;”*

WDR Provision 13viii – System Evaluation and Capacity Assurance Plan - General comments: (1.) This requirement will require significant new funding. While the City has completed master plans for some of its sanitary basins, many have not received a thorough study.(2.) The proposed implementation schedule calls for completion of this step in 30 months, which will be difficult to achieve. To adequately scope and identify a budget for this effort will require approximately 9 months. The City budget process takes 6 months, starting each year in January and ending with budget approval/implementation in July. A typical master plan, with wet and dry season flow monitoring, smoke testing, computer modeling, and report production would likely require at least 2 years. A 45 to 60 month implementation schedule would be more realistic.

MONITORING AND REPORTING PROGRAM

Spill category 1 Major Spill definition, category B – In the sentence, “Result in a discharge to a storm drain, drainage channel, or surface water.” Delete the phrase *“to a storm drain”*. Please note that in the City of Sacramento, about 95% of the storm drainage, and all the combined sewage, is in effect disconnected from a receiving

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waterway since it is routed to a pump station and pumped to a creek or river. In addition, the vast majority of the SSO's are captured in a storm drain tributary pipeline and removed before they reach the pump station. Therefore, in this city, the waterways are protected such that they rarely receive an SSO. It is inappropriate to classify such a spill, that normally has no effect on a waterway, as a "Major" spill. In addition, most of the information required for online reporting, as stated elsewhere, does not apply for a small SSO captured in the storm drain system.