



SSO Hearing: 2/8/06

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January 25, 2006

Tam Doduc, Chair and Members
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814

**Board of Directors****Representing:**

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

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District Engineer

Marcia Maurer
Chief Financial Officer

Wendell H. Kido
District Manager

Mary K. Snyder
Collection Systems Manager

Stan R. Dean
Plant Manager

Dear Chair Doduc and Members:

The Sacramento Regional County Sanitation District (SRCS D) is pleased to provide comments on the State Water Resources Control Board's (SWRCB) Draft Statewide General Waste Discharge Requirements (WDR) for Sewage Collection Agencies addressing Sanitary Sewer Overflows (SSOs). The District provides sanitary sewer collection, conveyance, treatment and reclamation to over one million residents and thousands of commercial and industrial businesses in the greater Sacramento area. On average, over 165 million gallons of wastewater is collected, treated and safely discharged each day.

SRCS D supports the collaborative approach that has been undertaken to develop a program to reduce SSOs. As an active participant in the SSO Guidance Committee, we have worked with members of the Committee for the last two years to provide input into the development of an effective SSO Reduction Program and have submitted comments throughout the stakeholder process. However, we still have some remaining concerns with the current proposal. Our key issues related to the current draft WDR are highlighted below and our detailed comments are provided in the attached draft WDR and Monitoring & Reporting Program (MRP) in a strikeout/underline format.

Affirmative Defense and Enforcement Discretion

SRCS D shares the goal of reducing SSOs and improving collection system management. However, there must be some enforcement discretion provided to agencies for those SSOs that are rare or exceptional. We supported the limited affirmative defense language that was previously included in the prior draft WDR and were disappointed that it has been deleted from the current draft WDR. At a minimum, we encourage the SWRCB to provide clear enforcement discretion that would provide that enforcement action is only warranted if the Permittee has a history of chronic SSOs, is not complying with its SSMP, or did not respond in a timely manner, where practical, to contain and mitigate SSOs. We further believe that there must be clear direction to SWRCB and RWQCB staff that enforcement would not normally be warranted for exceptional spills that are caused by severe natural actions or storms that exceed a sewer agency's design storm or in an area that has had a State or federally declared natural disaster or emergency. There must be some protection from enforcement to permittees that are in compliance with the terms of the WDR, yet experience unavoidable overflows.

Statewide WDR Should Supersede Existing WDRs and NPDES Permits

It was our understanding throughout the stakeholder process that one of the primary objectives of adopting a Statewide WDR was to ensure consistent regulatory and reporting requirements throughout the State. However, as currently drafted, the Statewide WDR specifies that a Regional Board may impose more prescriptive and stringent requirements. We have concern that this may not only lead to inconsistent standards, but also create compliance problems for permittees that may be subject to conflicting requirements. If Regional Boards are allowed to impose different requirements, this is contrary to the goal of a unified statewide program. We strongly encourage the SWRCB to modify the current language in the WDR to instead, encourage Regional Boards to rescind existing individual and general WDRs.

Fats, Oils and Grease Source Control

An overall comment is that the WDR should be less prescriptive and instead provide the general goals and objectives of the WDR and the key elements of an SSMP. An example where we believe there is too much specificity, is in the Fats, Oils and Grease (FOG) section. Each jurisdiction should have the flexibility to develop a FOG program that addresses the source of their FOG problems - whether it includes a residential component, commercial component, or a combination of each. The details on how to accomplish those objectives should be left to the permittee, since there are many differences among sanitation agencies and collection systems that must be considered (geographic, economic, age, size, source of problems, etc.). We have made suggested language changes in the draft WDR to provide this flexibility.

Privately Owned Sewer Laterals

The voluntary reporting of private lateral SSOs should not be included in the WDR or MRP.

Monitoring and Reporting of SSOs

SRCSD supports statewide consistency in reporting SSOs. However, we believe an appropriate threshold should be established based on risk to public health and the environment. The law currently requires reporting those SSOs that are greater than 1,000 gallons and reach waters of the State. We believe the two tier reporting system currently drafted is on the "right track". However, we would encourage the SWRCB to establish a 100 gallon reporting threshold for Category II SSOs and specific exclusions from reporting those spills that are related to maintenance activities and those SSOs that are contained and pumped back into the sewer system and do not pose a significant public health or water quality impact. This issue should also be clarified in the definition of an SSO.

Compliance Schedule


There is much effort ahead, as we continue to work through the details of developing a sound SSO reduction program for California. However, the compliance schedule that is currently outlined in the WDR is very aggressive and prescriptive. We would recommend less specificity on the milestones in order to provide more flexibility to agencies to develop and implement a SSMP that addresses their unique circumstances and that these timeframes be extended. For instance, rather than specifying individual compliance dates for the SSMP milestones, the WDRs should simply specify the deadline for completion of an SSMP that includes all the required components. In addition, we have significant concern with respect to compliance with the electronic reporting aspects of the WDR. The proposed time schedule requires permittees to report SSOs through the SWRCB "On-Line Reporting System" within four months of WDR adoption. However, this on-line system has not yet been tested nor have agencies been educated on how to use this database. Therefore, it is highly unlikely that the details of this program have been worked out and that on-line reporting would be able to be achieved within four months.

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SRCSD Comments
On SWRCB Draft General
Waste Discharge Requirements
For Sanitary Sewer Agencies

In closing, SRCSD appreciates the opportunity to work with the SWRCB on this draft WDR and hope you find our comments helpful. We believe that the collaborative process that has taken place to develop this draft WDR has not only provided an opportunity to exchange new ideas and view points, but it has also allowed alternative measures to be evaluated that can achieve the goal of reducing SSOs. We hope this process will continue in a positive and productive manner with participation from the various stakeholders. We would also encourage the SWRCB to prepare to educate not only the various collection system agencies regarding the new requirements, but to also prepare to educate the public. One particular area that will need to be addressed relates to the number of SSOs that will be reported via the statewide SSO reporting system. Because there will now be standards in place for reporting, there may be a perception that the number of SSOs occurring have increased. When in actuality, there has been no increase in the number of SSOs, as these changes can be attributed to the change in reporting requirements.

If you have any questions regarding our comments, please feel free to contact me or Terrie Mitchell at 916-876-6092.

Sincerely;

for 
Robert F. Shanks
District Manager

Attachments: Draft WDR with Comments Incorporated
Draft Monitoring Program with Comments Incorporated

cc: Bryan Brock - SWRCB
Wendell Kido - SRCSD
Stan Dean - SRCSD
Terrie Mitchell - SRCSD

Draft

STATE WATER RESOURCES CONTROL BOARD

MONITORING AND REPORTING PROGRAM NO. 2006- STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR WASTEWATER COLLECTION SYSTEM AGENCIES

This Monitoring and Reporting Program (MRP) establishes monitoring, record keeping, reporting and public notification requirements for Order No. 2006-, "Statewide General WDR Permit for Wastewater Collection System Agencies." Revisions to this MRP may be made at any time by the Executive Director, and may include a reduction or increase in the monitoring and reporting.

A. SANITARY SEWER OVERFLOW REPORTING

Spill^[d1] Categories^[d2]

1. Major - All discharges of sewage from an enrollee's sanitary sewer system that:
Equal or exceed 1000 gallons, or
Result in a discharge to a storm drain, drainage channel, or surface water;
or
Create or threaten to create a condition of pollution or nuisance as defined in the California Water Code section 13050(The sections are redundant, and we don't enforce the Health and Safety Code anyway.)
2. Minor - All discharges of sewage from an enrollee's sanitary sewer system that:
A. Are less than 1000 gallons^[d3], and
B. Do not result in a discharge to a storm drain, channel, or surface water or tributary to a surface water; and
3. Private Lateral Spills - Spills that are caused by blockages or other problems within a privately owned lateral.

Spill Reporting Timeframes

4. Major Spills - All spills that meet the above criteria for Major Spills must be reported as soon as: (1) that person has knowledge of the discharge, (2) reporting is possible, and (3) reporting can be provided without substantially impeding cleanup or other emergency measures. Initial reporting of Major spills must be reported to the Online SSO System as soon as possible but no later than ~~3~~^[d4] 5 business days after the enrollee is made aware of the SSO. A final certified report must be completed through the Online SSO System, within 15

days of the spill conclusion. Additional information may be added to the certified report, in the form of an attachment, at any time.^[d5]

The above reporting requirements do not preclude other emergency notification requirements and timeframes mandated by other regulatory agencies (Local County Health Officers, Local Director of Environmental Health, Regional Water Boards, or Office of Emergency Services) or State law.

5. Minor Spills – All spills that meet the above criteria for Minor Spills must be reported to the Online SSO Database within 30 days after the end of the calendar month in which the spill occurs (e.g. all spills occurring in the month of January must be entered into the database by March 1st).
- ~~6. Private Lateral Spills – All spills that meet the above criteria for Private Lateral Spills may be reported to the Online SSO Database based upon the Enrollee's discretion. If a Private Lateral Spill is recorded in the SSO Database, the Enrollee must identify the spill as occurring and caused by a private lateral, and a responsible party (other than the Enrollee) should be identified^[d6].~~
- ~~7. If there are no SSOs during the calendar month, the Enrollee will provide a statement within the Online SSO Database certifying that there were no sanitary sewer overflows within 30 days after the end of each calendar month.~~

Mandatory Information to be Included in SSO Online Reporting

All Enrollees must obtain SSO Database accounts and receive a "Username" and "Password" by registering through the California Integrated Water Quality System (CIWQS). These accounts will allow controlled and secure entry into the SSO Database. Additionally, within thirty (30) days of receiving an account and prior to recording spills into the SSO Database, all enrollees must complete the "Collection System Questionnaire", which collects pertinent information regarding an enrollee's collection system. The "Collection System Questionnaire" must be updated at least every 12 months.

At a minimum, the following mandatory information that must be included prior to finalizing and certifying an SSO for each category of spill:

6. Minor Spills:
 - A. Location of spill by entering closest street address or Latitude and Longitude information in decimal degrees;
 - B. Applicable Regional Water Quality Control Board, i.e. identify the region in which the spill occurred;
 - C. County where spill occurred;
 - D. Whether or not spill entered surface water;
 - E. Whether or not spill threatened human health;
 - F. Spill amount in gallons;
 - G. Spill source (manhole, cleanout, etc...);

- H. Spill cause (private lateral, mainline blockage, roots, etc...);
- I. Estimated spill start time;
- J. Estimated operator arrival time;
- K. Spill destination;
- L. Estimated spill end time;
- M. Final spill amount in gallons; and
- N. Spill Certification. Upon Spill Certification, the SSO Database will issue a Final SSO Identification (ID) Number.

9. Private Lateral Spills:

- ~~A. All information listed above, as well as;~~
- ~~B. Identification of spill as private lateral; and~~
- ~~C. Responsible party contact information.~~

7. Major Spills:

- A. All information listed for Minor Spills, as well as;
- B. Spill amount that reached surface water;
- C. Spill amount recovered;
- D. Response and corrective action taken;
- E. If samples were taken, identify which regulatory agencies received sample results (if applicable). If no samples were taken NA must be selected.
- F. Parameters samples were analyzed for (if applicable);
- G. Identification of whether or not health warnings were posted;
- H. Beaches impacted (if applicable). If no beach was impacted NA must be selected;
- I. Whether or not there is an ongoing investigation;
- J. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the overflow and a schedule of major milestones for those steps;
- K. OES control number (if applicable);
- L. Date OES was called (if applicable);
- M. Time OES was called (if applicable);
- N. Identification of whether or not County Health Officers were called;
- O. Date County Health Officer was called (if applicable); and
- P. Time County Health Officer was called (if applicable).

Reporting to Other Regulatory Agencies

These reporting requirements do not preclude an enrollee from reporting SSOs to other regulatory agencies pursuant to California state law. These reporting requirements do not replace other Regional Water Quality Control Board telephone reporting requirements for SSOs.

1. The enrollee shall report SSOs to the Office of Emergency Services (OES), in accordance with California Water Code Section 13271.

Office of Emergency Services
Phone (800) 825-7550

2. The enrollee shall report SSOs to County Health officials in accordance with California Health and Safety Code Section 5410 et seq.
3. The SSO database will automatically generate an e-mail notification with customized information about the SSO upon initial reporting of the spill and final certification for all Major Spills. E-mails will be sent to the appropriate County Health Officer and/or Environmental Health Department if the county desires this information, and the appropriate Regional Water Quality Control Board.

B. Record Keeping

1. Records shall be maintained by the enrollee for a minimum of three years from the date of the SSO. This period may be extended when requested by a Regional Board Executive Officer.
3. All records shall be made available for review upon State or Regional Water Board staff's request.
4. All monitoring instruments and devices that are used by the enrollee to fulfill the prescribed monitoring program shall be properly maintained and calibrated as necessary to ensure their continued accuracy;
5. The enrollee shall retain records of all SSOs, such as, but not limited to and when applicable:
 - a. All original recordings for continuous monitoring instrumentation;
 - b. Service call records and complaint logs of calls received by the enrollee;
 - c. Spill calls;
 - d. Spill records;
 - e. Copies of all reports required by this Order;
 - f. The location of the overflow and the receiving water if any (street address or GPS coordinates);
 - g. An estimate of the volume of the overflow;
 - h. A description of the sewer system component from which the release occurred (e.g., manhole, constructed overflow pipe, crack in pipe);
 - i. The estimated date and time when the overflow began and when it stopped;
 - j. The cause or suspected cause of the overflow;
 - k. Steps that have been and will be taken to prevent the overflow from recurring and a schedule to implement those steps.
 - l. Work orders, work completed, and any other maintenance records from the previous 3 years which are associated with responses and investigations of system problems related to sanitary sewer overflows;
 - m. A list and description of complaints from customers or others from the previous 3 years; and

- n. Documentation of performance and implementation measures for the previous 3 years.
6. If water quality samples are required by an environmental or health regulatory agency or state law, or if voluntary monitoring is conducted by the Enrollee or its agent, as a result of any SSO, records of monitoring information shall include:
- a. The date, exact place, and time of sampling or measurements;
 - b. The individual(s) who performed the sampling or measurements;
 - c. The date(s) analyses performed;
 - d. The individual(s) who performed the analyses;
 - e. The analytical technique or method used; and,
 - f. The results of such analysis.
- C. Certification**
- 1. All final reports must be certified by an authorized person as required by Provision I of the Order.
 - 2. Registration of authorized individuals, who may certify reports, will be in accordance with the California Integrated Water Quality System (CIWQS) protocols for reporting.

Monitoring and Reporting Program No. 2006 - will become effective on the date of adoption by the State Water Resources Control Board.

CERTIFICATION

The undersigned Clerk to the Board does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the State Water Resources Control Board held on January 2006.

Clerk to the Board

Ordered by: _____

Dated:

[d1]Consider replacing the term "spill" with the term "SSO".

[d2]The spill categories need to be consistent with the WDR and the definition of a SSO.

[d3]There should be some type of threshold for reporting these types of SSOs based on public health risk-100 gallons would seem reasonable. Reporting all releases could have a significant administrative cost.

[d4]Current reporting requires verbal notification within 24 hrs, followed by a preliminary written report within 5 business days.

[d5]Certified reports must be allowed to be modified if corrections are necessary, not in the form of an attachment.

[d6]Private lateral spills should be handled in a different manner through a voluntary reporting system that would be established separately from this WDR and MRP. It is inappropriate to include voluntary reporting of lateral spills in the WDR and MRP.

Draft

12/5/2005

STATE WATER RESOURCES CONTROL BOARD{PRIVATE }

ORDER NO. 2006-?

STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR WASTEWATER COLLECTION SYSTEM AGENCIES

The State Water Resources Control Board, hereinafter referred to as "State Water Board", finds that:

1. All federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems or any facilities that collect or convey untreated wastewater to a publicly-owned treatment facility in the State of California are required to comply with the terms of this Order. Such entities are hereinafter referred to as "Enrollees".
2. Sanitary sewer overflows (SSOs) are overflows from collection systems of domestic wastewater, as well as industrial and commercial wastewater, depending on the pattern of land uses in the wastewater collection system tributary area. SSOs often contain high levels of suspended solids, pathogenic organisms, toxic pollutants, nutrients, oxygen-demanding organic compounds, oil and grease and other pollutants. SSOs may cause a public nuisance, particularly when raw untreated wastewater is discharged to areas with high public exposure, such as streets or surface waters used for drinking, fishing, or body contact recreation. SSOs may pollute surface or ground waters, threaten public health, adversely affect aquatic life, and impair the recreational use and aesthetic enjoyment of surface waters.
3. Wastewater collection systems experience periodic failures and are known to leak, resulting in discharges that may affect waters of the state. There are many factors (including factors related to geology, design, construction methods and materials, age of the system, population growth, and system operation and maintenance), which affect the likelihood of an SSO. A proactive approach that requires wastewater collection system owners and operators to ensure a system-wide operation, maintenance, and management plan is in place will reduce the number and frequency of SSOs within the state. This will in turn decrease the risk to human health and environment caused by SSOs.
4. Major causes of SSOs include: grease blockages, root blockages, sewer line flood damage, manhole structure failures, vandalism, pump station mechanical failures, power outages, excessive storm or ground water inflow/infiltration, debris blockages, sanitary sewer system age and construction material failures, lack of proper operation and maintenance, insufficient capacity and contractor-

caused damages. Many SSOs are preventable with adequate and appropriate source control measures and operation and maintenance of the sanitary sewer system.

SEWER SYSTEM MANAGEMENT PLANS

5. To facilitate proper funding and management of sanitary sewer systems, each sanitary sewer system owner or operator must develop and implement a system-specific Sewer System Management Plan (SSMP). To be effective, SSMPs must include provisions to provide proper and cost effective management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit analysis. Additionally, an SSMP must contain a spill response plan that establishes standard procedures for immediate response to an SSO in a manner designed to minimize water quality impacts and potential nuisance conditions.
6. Many local public agencies in California have already developed SSMPs and implemented measures to reduce SSOs. These entities can build upon their existing efforts to comply with these requirements. Others, however, still require technical assistance and, in some cases, funding to improve collection system operation and maintenance in order to reduce SSOs.

~~SSMP certification [a1] by technically qualified and experienced persons can provide a useful and cost effective means for ensuring that SSMPs are developed and implemented appropriately.~~

7. It is the State Water Board's desire to gather additional information on the causes and sources of SSOs to determine the full extent of SSOs and consequent public health and/or environmental impacts occurring in the State.
8. Both uniform SSO reporting and a centralized statewide electronic database are needed to collect information to allow the State and Regional Water Boards to effectively analyze the extent of SSOs statewide and their potential impacts on beneficial uses and public health. The monitoring and reporting program required by this Order and the attached Monitoring and Reporting Program No.???, are necessary to assure compliance with these WDRs.
9. Information regarding SSOs must be provided to Regional Water Boards and other regulatory agencies in a timely manner and be made available to the public in a complete, concise, and timely fashion.
10. Several of the Regional Water Boards are engaged in initiatives to address SSOs. Some Regional Water Boards have issued Waste Discharge Requirements (WDRs) or National Pollution Discharge Elimination System (NPDES) permits to sanitary sewer system owners/operators within their jurisdictions. This Order establishes minimum requirements to prevent SSOs. Although it is the Water Board's intent that this Order be the primary regulatory

mechanism for sanitary sewer collection systems statewide, there will be some instances when Regional Water Boards will need to be more stringent or prescriptive than this Order provides. In those cases, this Order will not supersede a more specific or more stringent requirements contained in a WDR or NPDES permit issued by a Regional Water Board.

REGULATORY CONSIDERATIONS

11. California Water Code Section 13263 provides that the State Water Board may prescribe general WDRs for a category of discharges if the State Water Board finds or determines that:

- The discharges are produced by the same or similar operations
- The discharges involve the same or similar types of waste;
- The discharges require the same or similar treatment standards; and
- The discharges are more appropriately regulated under general discharge requirements than individual discharge requirements.

12. The issuance of a general WDR to the Enrollees will:

- a) Reduce the administrative burden of issuing individual WDRs to each Enrollee;
- b) Provide for a unified statewide approach for the reporting and database tracking of SSOs;
- c) Establish consistent and uniform requirements for SSMP development and implementation;
- d) Provide statewide consistency in reporting; and
- e) Facilitate consistent enforcement for violations of this order.

13. The beneficial uses of surface waters that can be impaired by SSOs include, but are not limited to, aquatic life, drinking water supply, body contact and non-contact recreation, and aesthetics. The beneficial uses of ground water that can be impaired include, but are not limited to, drinking water and agricultural supply. Surface and ground waters throughout the state support these uses to varying degrees.

14. The implementation of requirements set forth in this Order will ensure the reasonable protection of past, present, and probable future beneficial uses of water and the prevention of nuisance. The requirements implement the water quality control plans (Basin Plans) for each region and take into account the environmental characteristics of hydrographic units within the state. Additionally, the State Water Board has considered water quality conditions that could reasonably be achieved through the coordinated control of all factors that affect water quality in the area, costs associated with compliance with these requirements, the need for developing housing within California, and the need to develop and use recycled water.

15. The federal Clean Water Act prohibits any discharge of pollutants from a point source to surface waters except as authorized under an NPDES permit. In general, any point source discharge of sewage effluent to surface waters must comply with technology-based, secondary treatment standards, at a minimum, and any more stringent requirements necessary to meet applicable water quality standards and other requirements. Hence, the unpermitted discharge of raw untreated wastewater from a collection system to surface waters is illegal under the Clean Water Act. In addition, many Basin Plans adopted by the Regional Water Boards contain discharge prohibitions that apply to the discharge of raw untreated wastewater. Finally, the California Water Code generally prohibits the discharge of waste to land prior to the filing of any required report of waste discharge and the subsequent issuance of either WDRs or a waiver of WDRs.
16. This Order is consistent with State Water Board Resolution No. 68-16 (State of Policy with Respect to Maintaining High Quality of Waters in California) in that the Order imposes conditions to prevent impacts to water quality, does not allow the degradation of water quality, will not unreasonably affect beneficial uses of water, and will not result in water quality less than prescribed in State Water Board or Regional Water Board plans and policies.
17. The action to adopt this General Order is exempt from the California Environmental Quality Act (Public Resources Code §21000 et seq.) because it is an action taken by a regulatory agency to assure the protection of the environment and the regulatory process involves procedures for protection of the environment. (Cal. Code Regs., tit. 14, §15308). In addition, the action to adopt this Order is exempt from CEQA pursuant to Cal. Code Regs., title 14, §15301 to the extent that it applies to existing sanitary sewer collection systems that constitute "existing facilities" as that term is used in Section 15301.
18. The attached Information Sheet, which is incorporated by reference in the Order, contains supplemental information that was also considered in establishing these requirements.
19. The State Water Board has notified all affected public agencies and all known interested persons of the intent to prescribe general WDRs that require Enrollees to develop SSMPs and report all SSOs.
20. The State Water Board conducted a public hearing on January 19, 2006, to receive oral and written comments on the draft order. The State Water Board has considered all comments pertaining to the terms and condition of this Order.

IT IS HEREBY ORDERED, that pursuant to California Water Code section 13263, the Enrollees, their agents, successors, and assigns, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted hereunder, shall comply with the following:

A. DEFINITIONS

1. **Sanitary Sewer Overflow** - A sanitary sewer overflow (SSO) is any overflow, spill, release, discharge or diversion of untreated wastewater from a sanitary sewer system. SSOs include:
 - (i) Overflows or releases of untreated wastewater that reach surface waters;
 - (ii) Overflows or releases of untreated wastewater that do not reach surface waters^[d2]; and
 - (iii) Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.
 - (iiii) Controlled releases from maintenance activities that are contained; and releases that are fully contained, greater than 100 gallons, have not reached surface waters, are pumped back into the sanitary sewer and the surface that came into contact with the wastewater is adequately cleaned in accordance with the procedure identified in the SSMP are excluded.
2. **Sanitary Sewer System** - Any system of pipes, pump stations, sewer lines, or other conveyances, upstream of the headworks used to collect and convey wastewater. Temporary storage and conveyance facilities (such as vaults, temporary piping, construction trenches, wet wells, impoundments, tanks, etc.) are considered to be part of the sanitary sewer system, and discharges into these temporary storage facilities is not considered an SSO.
3. **Enrollee** - Federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems or any facilities that collect or convey untreated wastewater to a publicly-owned treatment facility in the State of California and that have submitted a complete and approved application for coverage under - this Order.
4. **SSO Reporting System** - Online spill reporting system that is hosted, controlled, and maintained by the State Water Board. The web address for this site is: [www.---.waterboards.ca.gov](http://www.waterboards.ca.gov) (**web address to be determined**). This online database is maintained on a secure site and is controlled by unique usernames and passwords.
5. **Untreated wastewater** - Any volume of untreated sewage, solids, or wastewater (from domestic, industrial, commercial or mixed sources) discharged upstream of a treatment facility.

6. **Satellite Collection System** – Any public agency that owns or operates a sanitary sewer system, which is tributary to a wastewater treatment facility owned or operated by a separate public agency.

B. APPLICATION REQUIREMENTS

1. **Deadlines for Application** – All public agencies that currently own or operate sanitary sewer systems within the State of California must apply for coverage under this General Order within three (3) months of the date of adoption of this Order. Additionally, public agencies that acquire or assume responsibility for operating sanitary sewer (collection) systems after the date of adoption of this Order must apply for coverage under this General Order at least three (3) months prior to operation of those facilities.
2. **General Permit Application** – In order to apply for permit coverage pursuant to this General Order, a legally authorized representative for each agency must submit a complete application package. Within thirty (30) days of this Order's adoption, State Water Board staff will send specific instructions on how to apply for coverage under this Order to all known public agencies. Agencies that do not receive notice may obtain applications and instructions online on the Water Board's website.
3. **General Permit Coverage** – Permit coverage will be in effect upon the completion and approval of a complete application package.

C. PROVISIONS

1. The Enrollee must comply with all conditions of this Order. Any noncompliance with this Order constitutes a violation of the California Water Code and is grounds for enforcement action.
2. It is the intent of the State Water Board that public sanitary sewer systems be regulated in a manner consistent with this WDR. Nothing in this WDR shall be:
 - (i) Interpreted or applied in a manner inconsistent with the Federal Clean Water Act, or supersede a more specific or more stringent state or federal requirement in an existing permit, regulation, or administrative/judicial order or Consent Decree; [d3]
 - (ii) Interpreted or applied to authorize an SSO that is illegal under either the Clean Water Act, an applicable Basin Plan prohibition or water quality standard, or the California Water Code;
 - (iii) Interpreted or applied to prohibit a Regional Water Board from issuing an individual NPDES permit, or applicable collection system requirements, authorized under the Clean Water Act; or

- (iv) Interpreted or applied to supersede any more specific or more stringent requirement in WDRs or in an enforcement order issued by a Regional Water Board.
- 3. The Enrollee shall take all feasible steps to eliminate SSOs. In the event that an SSO does occur, the Enrollee shall take all feasible steps to contain and mitigate the impacts of an SSO.
- 4. The enrollee shall take all feasible steps to prevent untreated wastewater from discharging from storm drains into flood control channels or surface waters by blocking the storm drainage system and by removing the wastewater from the storm drains.
- 5. All SSOs must be reported in accordance with Section F of this WDR.
- 6. In any enforcement action, the State and/or Regional Water Boards will consider the Enrollee's efforts to contain, control, and clean up SSOs from its collection system as part of their consideration of the California Water Code section 13327 or 13385 factors. In assessing these factors, the State and/or Regional Water Boards will also consider whether:
 - (i) The Enrollee has complied with the requirements of this Order, including requirements for reporting and developing and implementing an SSMP;
 - (ii) The Enrollee can identify the cause or likely cause of the discharge event;
 - (iii) There were no feasible alternatives to the discharge, such as temporary storage or retention of untreated wastewater, reduction of inflow and infiltration, use of adequate backup equipment, collecting and hauling of untreated wastewater to a treatment facility, or an increase in the capacity of the system as necessary to contain the design storm event identified in the SSMP. It is inappropriate to consider the lack of feasible alternatives, if the Enrollee does not implement a periodic or continuing process to identify and correct problems.
 - (iv) The discharge was exceptional, unintentional, temporary, and caused by factors beyond the reasonable control of the Enrollee;
 - (v) The discharge could have been prevented by the exercise of reasonable control described in a ~~certified~~ SSMP for:
 - Proper management, operation and maintenance;
 - Adequate treatment facilities or sanitary sewer system facilities or components (e.g., adequately enlarging treatment or collection facilities to accommodate growth, infiltration and inflow, etc...);
 - Preventive maintenance (including cleaning and fats, Oils and grease (FOG) control);
 - Installation of adequate backup equipment; and

- Adequate inflow and infiltration prevention and control.
 - (vi) The spill was caused by a wet weather event that exceeded the design capacity of the collection system as documented in the SSMP.
 - (vii) The collection system design capacity is appropriate to reasonably prevent SSOs.
 - (viii) The Enrollee took all reasonable steps to stop and mitigate the impact of the discharge as soon as possible.
7. When a sanitary sewer overflow occurs, the Enrollee shall take all feasible steps and necessary remedial actions to 1) control or limit the volume of untreated wastewater discharged, 2) terminate the untreated wastewater discharge, and 3) recover as much of the untreated wastewater discharged as possible for proper disposal, including any wash down water.

The Enrollee shall implement all remedial actions to the extent they may be applicable to the discharge and consistent with an emergency response plan, including the following:

- (i) Interception and rerouting of untreated wastewater flows around the wastewater line failure;
 - (ii) Vacuum truck recovery of sanitary sewer overflows and wash down water;
 - (iii) Cleanup of debris at the overflow site;
 - (iv) System modifications to prevent another SSO at the same location;
 - (v) Adequate sampling to determine the nature and impact of the release; and
 - (vi) Adequate public notification to protect the public from exposure to the SSO.
8. The Enrollee shall properly, manage, operate, and maintain all parts of the sanitary sewer system owned and operated by the Enrollee, and shall ensure that the system operators are adequately trained and possess adequate knowledge, skills, and abilities.
9. The Enrollee shall allocate adequate resources for the operation, maintenance, and repair of its sanitary sewer system, by establishing a proper rate structure, accounting mechanisms, and procedures to ensure an adequate and auditable measure of revenues and expenditures. These procedures must be in compliance with applicable existing laws and regulations and comply with generally acceptable accounting practices.
10. The Enrollee shall provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events. Capacity shall meet or exceed the design criteria as defined in the Enrollee's System Evaluation and

Capacity Assurance Plan for all parts of the sanitary sewer system owned or operated by the Enrollee.

11. The Enrollee shall develop and implement a ~~written~~ Sewer System Management Plan (SSMP) and make it available to the State and/or Regional Water Board upon request. This SSMP must be adopted and approved by the elected governing board at a public meeting.
12. In accordance with the California Business and Professions Code Sections 6735, 7835, and 7835.1, all engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields' pertinent to the required activities. The SSMP shall be prepared by or under the direction of appropriately qualified professionals, and shall bear the professional(s)' signature and stamp.
13. The essential elements of the SSMP are specified below. If the Enrollee believes that any element of this section is not appropriate or applicable to the Enrollee's sanitary sewer system, the SSMP program does not need to address it, but must contain an explanation as to why that element is not applicable.

Sewer System Management Plan (SSMP)

- (i) **Goals:** The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the wastewater collection system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.
- (ii) **Organization:** The SSMP must identify:
 - (a) The responsible or authorized representative as detailed in Section H of this Order.
 - (b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. Include lines of authority as shown in an organization chart or similar document with a narrative explanation; and
 - (c) The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).
- (iii) **Legal Authority:** Each Enrollee must demonstrate, through collection system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- (a) Prevent illicit discharges into its wastewater collection system (examples may include infiltration and inflow (I/I), stormwater, chemical dumping, unauthorized debris and cut roots, etc...);
 - (b) Require that sewers and connections be properly designed and constructed;
 - (c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
 - (d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and
 - (e) Enforce any violation of its sewer ordinances.
- (iv) **Operation and Maintenance Program.** The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:
- (a) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities;
 - (b) Describe routine preventive operation and maintenance activities by staff and contractors; including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system of tracking activities, such as work orders;
 - (c) Identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets;
 - (d) Provide training on a regular basis for staff in sanitary sewer system operations, maintenance, and require contractors to be appropriately trained; and

- (e) Provide equipment and replacement part inventories, including identification of critical replacement parts.

(v) Design and Performance Provisions:

- (a) Design and construction standards and specifications for the installation of new sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sewer systems; and
- (b) Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

(vi) Overflow Emergency Response Plan - Each enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan should include the following:

- (a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- (b) A program to ensure appropriate response to all overflows;
- (c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, regional water boards, water suppliers, etc...) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, State Law, and other applicable Regional Water Board WDR or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification;
- (d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (f) A program to ensure that all reasonable steps are taken to contain untreated wastewater and prevent discharge of untreated wastewater to surface waters and minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

(vii) Fats, Oils, and Grease (FOG) Control Program: Each Enrollee shall evaluate its service area to determine whether a FOG control program is

needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- (a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
 - (b) ~~A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area; Identification of authorized grease disposal locations and list of licensed grease haulers.~~
 - (c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
 - (d) Requirements that may include: the installation and maintenance of grease removal devices (such as traps and interceptors), implementation of Best Management Practices (BMPs), and/or specified [m4] recordkeeping or reporting. ~~Requirements to install grease removal devices (such as traps or interceptors) design standards for the removal devices [a5], maintenance requirements, BMP requirements, record keeping and reporting requirements;~~
 - (e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the ~~FOG~~their [m6] ordinance;
 - (f) An identification of sewer system sections subject to FOG blockages ~~and establish a cleaning maintenance schedule for each section; and~~
 - (g) Development and implementation of source control measures, which may include education and outreach, installation of grease removal devices or BMPs, for all those problem areasources of FOG discharged to the sewer system, for each section identified in (f) above.
- (viii) **System Evaluation and Capacity Assurance Plan:** The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sewer system elements for dry

weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

- (a) **Evaluation:** Steps to evaluate those portions of the sanitary sewer system, which are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
 - (b) **Design Criteria:** Where design criteria do not exist or are deficient, a program to assess the current capacity of the sanitary sewer system owned or operated by the Enrollee; and
 - (c) **Capacity Enhancement Measures:** Establish a short- and long-term CIP to address identified hydraulic deficiencies including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.
- (ix) **Monitoring, Measurement, and Program Modifications:** The Enrollee shall:
- (a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
 - (b) Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;
 - (c) Assess the success of the preventative maintenance program;
 - (d) Update program elements, as appropriate, based on monitoring or performance evaluations; and
 - (e) Identify and illustrate SSO trends, including: frequency, location, and volume.
- (x) **SSMP Program Audits** - As part of the SSMP, the permittee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two-three years and a report must be prepared and kept on file. This audit should focus on evaluating the effectiveness of the SSMP and

Enrollee's compliance with this subsection, including identification of any deficiencies in the SSMP and steps to correct them.

- (xi) **Communication Program** — ~~The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.~~ (d7)

~~The Enrollee shall also create a plan of communication with systems that are tributary to the Enrollee's sanitary sewer collection system.~~ (d8)

14. Both the SSMP and the Enrollee's program to implement the SSMP must be self-certified to be in compliance with the requirements set forth above by the appropriate governing board and must be presented to the board at a public meeting. The Enrollee shall self-certify that the SSMP, and subparts thereof, are in compliance with this WDR within the time frames identified in the time schedule provided in Finding number 15, below.

In order to complete this certification, the Enrollee's authorized representative must complete the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form, and sending the form to:

Office of Statewide Initiatives
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

The SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification by the governing Board of the permittee is required when significant updates to the SSMP are made. To complete the re-certification process, the Enrollee shall enter the data in the Online SSO Database and mail the form to the State Water Board, as described above.

15. The Enrollee shall comply with these requirements according to the following schedule. This time schedule does not supersede existing requirements or time schedules associated with other permits or regulatory requirements.

Sewer System Management Plan Time Schedule

Task and Associated Section	Completion Date			
	Population > 100,000	Population between 100,000 and 10,000	Population between 10,000 and 2,500	Population < 2,500
Application for Permit Coverage Section B	3 months after WDR Adoption	3 months after WDR Adoption	3 months after WDR Adoption	3 months after WDR Adoption
Reporting Program Section F	4 months after WDR Adoption	4 months after WDR Adoption	4 months after WDR Adoption	4 months after WDR Adoption [m9]
SSMP Development Plan and Schedule No specific Section	9-12 months after WDR Adoption	12-15 months after WDR Adoption	15-18 months after WDR Adoption	18-24 months after WDR Adoption
Goals and Organization Structure Section C 13 (i) & (ii)	9 months after WDR Adoption	12 months after WDR Adoption	15 months after WDR Adoption	18 months after WDR Adoption
Overflow Emergency Response Program Section C 13 (vi)	9 months after WDR Adoption	12 months after WDR Adoption	15 months after WDR Adoption	18 months after WDR Adoption
Legal Authority Section C 13. (iii)	18 months after WDR Adoption	21 months after WDR Adoption	24 months after WDR Adoption	27 months after WDR Adoption
Operation and Maintenance Program Section C 13 (iv)	18 months after WDR Adoption	21 months after WDR Adoption	24 months after WDR Adoption	27 months after WDR Adoption
Grease Control Program Section C 13 (vii)	18 months after WDR Adoption	21 months after WDR Adoption	24 months after WDR Adoption	27 months after WDR Adoption
Design and Performance Section C 13 (v)	30 months after WDR Adoption	33 months after WDR Adoption	36 months after WDR Adoption	39 months after WDR Adoption
System Evaluation and Capacity Assurance Plan Section C 13 (viii)	30 months after WDR Adoption	33 months after WDR Adoption	36 months after WDR Adoption	39 months after WDR Adoption
Final SSMP, incorporating all of the SSMP requirements Section C 13	36 months after WDR Adoption	39 months after WDR Adoption	42 months after WDR Adoption	45 months after WDR Adoption

D. WDR AVAILABILITY

1. A copy of this WDR shall be maintained at appropriate locations and shall be available to sanitary sewer system operating and maintenance personnel at all times.

E. ENTRY AND INSPECTION

1. The Enrollee shall allow the Regional Board or its authorized representative, upon presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the Enrollee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
 - d. Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order or as otherwise authorized by the California Water Code, any substances or parameters at any location.

F. GENERAL MONITORING AND REPORTING REQUIREMENTS

1. The Enrollee shall furnish to the State or Regional Water Board, within a reasonable time, any information which the State or Regional Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Enrollee shall also furnish to the Executive Director of the State Water Board or Executive Officer of the applicable Regional Water Board, upon request, copies of records required to be kept by this Order.
2. The Enrollee shall comply with the attached Monitoring and Reporting Program No.??? and future revisions thereto, as specified by the Executive Director. Monitoring results shall be reported at the intervals specified in Monitoring and Reporting Program No.???. Unless superceded by a specific enforcement Order for a specific Enrollee, these reporting requirements are intended to replace other mandatory routine written reports associated with SSOs.
3. All enrollees must obtain SSO Database accounts and receive a "Username" and "Password" by registering through the California Integrated Water Quality System (CIWQS). These accounts will allow controlled and secure entry into the SSO Database. Additionally, within 30days of receiving an account and prior to recording spills into the SSO Database, all enrollees must complete the

"Collection System Questionnaire", which collects pertinent information regarding a Permittee's collection system. The "Collection System Questionnaire" must be updated at least every 12 months.

4. Pursuant to Health and Safety Code 5411.5, any person who, without regard to intent or negligence, causes or permits any untreated wastewater or other waste to be discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State, as soon as that person has knowledge of the discharge, shall immediately notify the local health officer and the Regional Board of the discharge.

Discharges of untreated wastewater to storm drains and drainage channels, whether man made or natural or concrete lined, shall be reported as required above.

All SSOs greater than 1,000 gallons discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State shall also be reported to the Office of Emergency Services pursuant to California Water Code Section 13271.

G. CHANGE IN OWNERSHIP

1. This Order is not transferable to any person, except after notice to the Executive Director. The Enrollee shall submit this notice in writing at least 30 days in advance of any proposed transfer. The notice must include a written agreement between the existing and new Enrollee containing a specific date for the transfer of this Order's responsibility and coverage between the existing Enrollee and the new Enrollee. This agreement shall include an acknowledgement that the existing Enrollee is liable for violations up to the transfer date and that the new Enrollee is liable from the transfer date on.

H. INCOMPLETE REPORTS

1. If an Enrollee becomes aware that it failed to submit any relevant facts in any report required under this Order, the Enrollee shall promptly submit such facts or information.

I. REPORT DECLARATION

1. All applications, reports, or information shall be signed and certified as follows:
 - (i) All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, by either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision.
 - (ii) An individual is a duly authorized representative only if:

- (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and
- (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

J. CIVIL MONETARY REMEDIES FOR DISCHARGE VIOLATIONS

1. The California Water Code provides various enforcement options, including civil monetary remedies, for violations of this Order.
2. The California Water Code also provides that any person failing or refusing to furnish technical or monitoring program reports, as required under this Order, or falsifying any information provided in the technical or monitoring reports is subject to civil monetary penalties.

K. SEVERABILITY

1. The provisions of this Order are severable, and if any provision of this Order, or the application of any provision of this Order to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Order, shall not be affected thereby.
2. This order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, nor protect the Enrollee from liability under federal, state or local laws, nor create a vested right for the Enrollee to continue the waste discharge.

CERTIFICATION

The undersigned Clerk to the Board does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the State Water Resources Control Board held on 2006.

Clerk to the Board

Ordered by: _____

Dated: _____

[d1]This section should be deleted. It is premature to include third party verification.

[d2]There should be some type of threshold for reporting these types of SSOs based on public health risk-100 gallons would seem reasonable. Reporting all releases could significantly increase administrative costs.

[d3]Modify to provide some assurance that this WDR will not be superseded or how it will apply to existing NPDES permits.

[m4]

[d5]The Uniform Plumbing Code currently provides design standards for interceptors. Agencies should not be responsible for developing their own design standards.

[m6]Some agencies may include this authority in an existing ordinance, not necessarily a separate FOG ordinance.

[d7]There is already sufficient public involvement through the governing board approval of the SSMP. Please delete.

[d8]Agencies do not have control over satellite agencies.

[m9]The on-line reporting system has not yet been tested, not have agencies received training. It is unlikely that compliance with this element is feasible within 4 months.