

From: Sandy Cheek
To: SSOcommentletters@waterboards.ca.gov
Date: 10/27/2009 12:54 PM
Subject: SSO Reduction Program Review and Update

To Whom it May Concern:

General Order 2006-0003-DWQ lists these prohibitions:

- "1. Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.
2. Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is prohibited."

This language appears to make spills to land that have not created a nuisance unenforceable. Perhaps the new order should list unregulated discharges to land as a prohibition.

Sincerely,

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