



**SACRAMENTO AREA
SEWER DISTRICT**

SERVING YOU 24/7

October 19, 2009

Waste Discharge Requirements Unit
State Water Resources Control Board
Attention: James Fischer
1001 I Street, 15th Floor
Sacramento, CA 95814

Subject: Sanitary Sewer Overflow Reduction Program Review and Update

Dear Mr. Fischer:

The Sacramento Area Sewer District (SASD) appreciates the opportunity to offer comments on the Sanitary Sewer Overflow (SSO) Reduction Program Review and Update. SASD provides sanitary sewer collection to more than one million residents and thousands of commercial and industrial customers in the Sacramento region, including the unincorporated areas of Sacramento County, the cities of Citrus Heights, Rancho Cordova, and Elk Grove, as well as portions of the cities of Folsom and Sacramento. SASD owns and operates 98 pump stations, 3,000 miles of sewer mainlines and 1,300 miles of lower sewer lateral lines. SASD takes its mission to protect public health and the environment very seriously and is responsible not only for the construction and capital improvement for the sewer collection system, but for the day-to-day operations and maintenance of these sewer pipes as well. Once collected in our system, sewage flows into the Sacramento Regional County Sanitation District interceptor system, where it is conveyed to the Sacramento Regional Wastewater Treatment Plant near Elk Grove.

SASD is providing the following comments based on recent workshops held by the State Water Resources Control Board (State Board) requesting feedback on the SSO Waste Discharge Requirements (WDR), its effectiveness and whether it should be revised. The SSO WDR has been in effect for three years and is still in its initial stages of implementation. SASD believes that the existing order should not be "re-opened" at this time and instead, the State Board should focus its efforts on data quality and consistency and full enrollee participation. We believe the above issues need to be addressed before the State Board can begin to evaluate the overall effectiveness of the order. Similar orders, such as the waste discharge requirements for SSO's in the Santa Ana basin, have proven to be effective when enrollee participation is consistent and quality data is used to create an accurate baseline for future comparisons. SASD believes that the best approach for improving the SSO WDR at this point is to avoid revisions and instead focus on the following administrative corrections that could be made to CIWQS and the monitoring and reporting program:

Board of Directors

Representing:

County of Sacramento
City of Citrus Heights
City of Elk Grove
City of Folsom
City of Rancho Cordova
City of Sacramento

Mary K. Snyder
District Engineer

Christoph Dobson
Collection System Manager

Wendell H. Kido
District Manager

Marcia Maurer
Chief Financial Officer

10545 Armstrong Avenue
Mather, California 95655
Tel 916.876.6000
Fax 916.876.6160
www.sacsewer.com

More consistent and relevant data

Additional guidance and education would be the best approach to ensure consistency in SSO reporting and in providing feedback as to what data would be relevant to collect. SASD recommends the establishment of a stakeholder group to develop guidance, as well as complete periodic data review and analysis. This stakeholder group could focus on standardizing reporting practices so that enrollees will be in agreement on what constitutes an SSO, what is a private spill, how to estimate volumes of spills, etc. The stakeholder group could then periodically review and analyze the data to ensure data quality and determine if the reporting practices have improved.

System performance comparisons and SSO Reporting

Evaluating and comparing agencies based on SSOs originating from mainlines will provide the State Board with the best performance measurement. However, current SSO reporting combines all SSOs, whether they originate from a sewer mainline or a lateral sewer line, which does not provide an accurate comparison among collection system agencies. Many agencies may not own lateral lines from a private property boundary to the mainline of the collection system. However, those agencies that do own this type of lateral will show a higher number of overall spills if there is not a separate category for reporting these “public lateral” SSOs. Unfortunately, in the CIWQS reporting system sewer laterals are included in the performance measure of number of spills per 100 miles of pipe. As a result, when SSOs for miles of lateral lines and mainlines are combined, it unfairly characterizes an agencies performance. We recommend that agencies who own laterals continue reporting on lateral spills per the order, but the CIWQS database and SSO/mile data should reflect only mainline spills as a performance measure. This will give a solid baseline and consistency to the data that is needed to properly evaluate if the SSO WDR is working. SASD owns and maintains the lower laterals and therefore is extremely concerned with the current performance metric displayed in CIWQS and has requested that these corrections be made.

SASD supports statewide consistency in reporting SSOs. However, we believe an appropriate threshold should be established based on risk to public health and the environment. We believe the two tier reporting system currently drafted is on the “right track”. However, we would encourage the SWRCB to establish a 50 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. Moreover, not reporting small spills, less than 50 gallons, will provide a more realistic measurement of a sewer system’s performance. Seventy-three percent of SASD SSOs from laterals are less than 10 gallons, and no lateral SSO less than 10 gallons has ever reached a waterway. The fact that small volumes of SSOs rarely have an impact to human health or the environment should be acknowledged and these spills not reported. An alternative to not reporting these spills would be to create a new category for small spills, such as a category 3 spill.

Increase enrollee participation

Compliance with existing requirements should be the key goal for all involved. Rather than the State Board spending resources modifying the existing WDR, SASD suggests that available resources should instead focus on increasing enrollment and unifying reporting practices. Appendix 4 from the Statewide Sanitary Sewer Overflow Reduction Program Annual Compliance report shows that on average, 61% of enrollees are submitting reports to the State Board. This alone means that the body

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of data is missing 39% of the enrollees' information. Couple this with the lack of reporting consistency, and it is obvious that the data is not as comprehensive or accurate as it could be. With the current limited resources at the State Board, it is prudent to maximize the effectiveness of the current order before expending the time and money to make changes. If the State Board avoids revisions to the WDR and focuses its efforts on enrollee participation and data quality, we believe that the SSO WDR will prove itself effective in reducing the frequency and volume of SSO's.

Private Lateral SSO Reporting

Private lateral spills reporting should remain voluntary. Public agencies have no jurisdiction or authority over private lateral SSOs. To encourage more *voluntary* reporting, CIWQS must be modified to clearly distinguish that the private lateral spill was not the responsibility of the reporting agency and delete the agency certification requirement for private SSOs. An agency could be falsely accused of having more SSOs attributed to it than it actually has based on the current public reports that are generated under CIWQS.

The Sacramento Area Sewer District appreciates the opportunity to be involved in the SSO WDR review effort. We believe that the existing order is working and with the administrative changes proposed in this letter, the order will work more effectively. We also are in support of those comments submitted by Tri-TAC and CVCWA .

If you have any questions, please call me at (916) 876-6092.

Sincerely,



Terrie Mitchell,
Manager, Legislative & Regulatory Affairs

cc: Mary Snyder, District Engineer, SASD
Christoph Dobson, Director of SASD Operations
Stan Dean, Director of Policy & Planning, SASD
Erin Harper, Principal Civil Engineer, SASD