



DEPARTMENT OF PUBLIC WORKS

October 19, 2009

Waste Discharge Requirements Unit  
State Water Resources Control Board  
1001 I Street, 15<sup>th</sup> floor  
Sacramento, CA 95814

SSO Reduction Program Staff:

SSO Reduction Program Review and Update

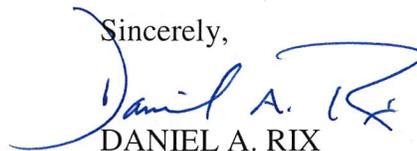
This is in response to the Notice of Public Meetings, allowing for written comments on the Sanitary Sewer Overflow Reduction Program Review and Update.

Example Questions, Section A, Bullet Item 4 - Since 1950, the City of Pasadena's Municipal Code has required that: *All house sewers and appurtenances thereto, now existing or hereafter constructed, shall be maintained by the owner of the property served in a safe and sanitary condition, and all devices or safeguards which are required by this chapter for the operation thereof shall be maintained in good working order.* Since house sewer laterals are privately owned and maintained, the City's Department of Public Works does not have the responsibility or authority to maintain these facilities. Therefore, the SSO General Order should not be revised to require mandatory reporting of spills associated with private house sewer laterals.

In addition, the City of Pasadena recommends that the existing Sanitary Sewer Overflow Wastewater Discharge Requirements (WDR) should not be re-evaluated until a minimum of two years after the existing program is fully implemented. This would allow all agencies to adopt their Sewer System Management Plans and to obtain meaningful data on its effectiveness. Revising the permit at this time to change the requirements will create confusion and present additional difficulties for agencies working to comply with the existing WDR.

Thank you for the opportunity to provide input on this matter. If there are any questions, please contact me at 626-744-4267 or Steve Walker at 626-744-4271.

Sincerely,

  
DANIEL A. RIX  
City Engineer