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Darren Polhemus
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State Water Resources Control Board
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SUBJECT: Sanitary Sewer Overflow (SSO) Reduction Program Review and Update

Dear Mr. Polhemus:

The City of Sacramento Department of Utilities appreciates the opportunity to provide our perspective on the State Water Resources Control Board's review of the General Waste Discharge Requirements for Sanitary Sewer Systems, Order WQ 2006-003. ("SSO WDR") We commend the Board for its commitment to reviewing the SSO WDR to evaluate its effectiveness and to offer stakeholders the opportunity to recommend revisions.

The City's separate sanitary sewer system is subject to the SSO WDR, and we are working diligently to implement the requirements of the order within the specified time frames. With respect to our separate collection system, we generally concur with the comments being submitted on behalf of the California Association of Sanitation Agencies and other wastewater associations. Specifically, implementation of the SSO WDR should be allowed to reach completion of its initial stated goals for enrollment and reporting by all public agencies before major changes to the scope and content of the order are made.

As one of only two combined sewer systems (CSS) in the state, we write separately to respond to the question regarding whether the SSO WDR should be



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amended to cover combined systems. We recommend that the Sanitary Sewer Overflow Reduction Program not be expanded to unnecessarily include CSS, which are already effectively regulated (both receiving water discharges and in-system outflows) by individual permits implementing the CSO Control Policy as codified by Congress. The State Water Board recognized this in 2006 when the SSO WDR was adopted and properly excluded CSS from coverage under the order. There is no good reason to depart from this decision now and apply the sewer system management planning and other substantive requirements of the SSO WDR to the CSS. That said, as discussed below, we are open to the possibility of having the CSS report outflow events using the statewide database.

Reporting: If the existing data base system can be modified to accurately characterize and segregate CSS outflows from the SSO reporting categories, the City does not object to using the statewide on-line reporting system to report these events, provided that other duplicative or conflicting reporting requirements are removed from the CSS permit. We understand the State Water Board's desire to have this data reported online and to have the information readily accessible to regional water boards and the public. Since the City already uses the SSO reporting system for its separate system, we would also benefit from a single set of consistent reporting requirements, time frames and protocols. If the State Water Board decides to move in this direction, we ask that a representative of the City participate in a workgroup to assist in developing the necessary modifications to the online reporting system.

Public Notification: Public notification requirements under the CSO Control Policy are comprehensive. Public notification for in-system outflows can only be effective at the local level. When sewer crews respond to an outflow event, the area is cordoned off to prevent public exposure and the department of public health is notified. Widespread electronic notification for this type of event would serve no purpose, as the backup is localized. CSS outflows are recaptured and contained within the system, and there is no possibility of a broader impact to receiving waters that could impact a wider portion of the public, as can occur with SSOs that reach separate storm sewers and may flow to creeks and streams. Given the particular characteristics of the CSS, public access prevention is sufficient public notification of such an event.

Sewer System Management Planning: When the SSO WDR was adopted in 2006, very few collection systems were subject to rigorous sewer system plans. The SSO WDR filled a void in the regulation of separate sanitary systems, the majority of which were unpermitted. It also created a level playing field to address broad inconsistencies in the manner in which individual regional boards regulated these systems. In contrast, there are only two combined systems in the state, and both have been subject to detailed NPDES permits for many years. Far from being unregulated, the City's CSS has been subject to a continuous focus on sewer system management and improvement since 1995. Requiring the CSS to shift gears now to comply with the numerous operative provisions of the SSO WDR would not only subject the City to two separate permits for a single system, but is also unnecessary, confusing, and would divert focus and attention from implementation of the long term control plan (LTCP) and the Nine Minimum Controls.

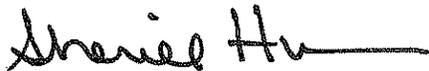
These existing programs are comprehensive and cover all aspects of system management, operations and capital improvements.

The efforts to date have been very successful. Implementation of the LTCP has reduced untreated combined sewer overflows (CSOs) from between six and 10 per year to only two untreated CSOs in the past nine years. The City has also achieved a large reduction in outflows, and further reductions are the focus of the current LTCP goals, which will be advanced through a calibrated computer model, identification of new capital improvement projects and adding storage, relief pipelines and overall rehabilitation. Given the proven track record of progress, these efforts should not be disrupted by a shift in direction but should be allowed to continue.

It is also important to recognize that where capacity issues may be of concern in a separate sanitary sewer system, there are no dry weather capacity issues for combined systems because the systems are designed with sufficient capacity for wet weather flows. And where separate sanitary sewer systems must look to reduce or eliminate inflow and infiltration, combined systems are designed to collect all stormwater flows. The City's CSS effectively collects 100% of all sewage and storm flows within the system, 95% of which receives treatment before discharge to the river.

In summary, the City urges the State Water Board to retain the existing system of regulation for CSS through an NPDES permit that implements the CSO Policy. We would be pleased to meet with you and your staff to further discuss these issues and to provide additional information regarding our program.

Sincerely,



Sherill Huun, P.E.
Supervising Engineer

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