

E-mail: SSOcommentletters@waterboards.ca.gov

Comment Letter–“SSO Reduction Program Review and Update.”

The City of Burbank Public Works Department (Burbank) appreciates the opportunity to comment on the review of the Sanitary Sewer Overflow Waste Discharge Requirements (SSO-WDR). Implementation of the existing SSO-WDR has been a valuable exercise in both the documentation of existing activities and an impetus for improving our current practices.

Since the adoption of the SSO-WDR, the City of Burbank has seen a steady reduction of overflows from the first year of online reporting. We expect a continued low number of overflows in future years through the implementation process. More important than the reduction in the *number* of spills occurring in Burbank is the improved response to any spill that occurs. The rapid termination of spills along with the prevention of those spills reaching receiving waters has resulted in the reduced possibility of environmental impact.

Due to the initial success of the WDR-SSO, it is surprising that the State Water Resources Control Board (State Water Board) is already considering the revision of this program. As the State Water Board is aware, the Sewer System Management Plans (SSMPPs) required under this permit have only recently been completed. It is too early to gauge the progress made under the existing permit as cities and agencies are in the beginning stages of implementation of their SSMPs. Changes to the permit, which would necessarily require changes to these SSMPs, would only create confusion for agencies and cities. The focus would be taken away from the improved maintenance of the sewer system and diverted to altering completed SSMPs.

Burbank suggests that the State Water Board should focus their efforts on bringing all cities and agencies into compliance with the existing permit rather than modifying the existing SSO-WDR. With only 61% currently complying with CIWQS monthly reporting and only 50% obtaining SSMP certification compliance, State Water Board efforts would be misguided if additional requirements are placed on those cities and agencies that are currently in compliance.

Two of the most useful sections of the current SSO-WDR are the sections on Monitoring, Measurement, and Program Modifications and SSMP Program Audits. These sections call for periodic program audits at least every two years. This process will allow cities and agencies to evaluate the success of their activities and then make the appropriate modifications. Since the SSMPs for large agencies and cities have only been completed this year, the self-audit process has not had time to be implemented. Changes to the SSO-WDR will delay this critical improvement process.

Thank you for your time and consideration of these comments. If you have any questions, please contact me, Daniel Rynn, at drynn@ci.burbank.ca.us or (818) 238-3940.