



**COUNTY OF ORANGE
HEALTH CARE AGENCY**

**PUBLIC HEALTH SERVICES
ENVIRONMENTAL HEALTH**

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

RE: SSO REDUCTION PROGRAM REVIEW AND UPDATE

The following comments are provided pursuant to the solicitation of public comments on the performance of the statewide SSO Reduction Program:

We continue to support notification and CIWQS reporting of all sewage discharges of any volume, public or private, and are against limiting CIWQS reporting to spills based on a minimum volume of discharge. Enrollees may respond to what appears to be a minor spill without realizing a sewer backup has caused a public health concern upstream of the blockage, such as sewage backing up inside of a restaurant or medical facility. In addition, many private spills in the past have gone unreported and would have resulted in ocean water closures had they been made known at the time of discharge.

Exemptions for seasonal facilities should not be allowed. Seasonal facilities may appear to pose a low risk, but activities and facilities may actually be unknowingly affected, such as a sewage backup into a food concession. Health agencies may never be made aware of such problems without mandatory reporting.

We continue to support the Executive Order for the minimum 2 hour notification reporting to local health agencies for sewage spills discharging into any drainage channel or surface water. Immediate notification of local health agencies has been inconsistent between enrollees. Emphasis should be placed on the requirement for immediate notification to ensure that health agencies can promptly evaluate spills for public health concerns beyond the scope of an enrollee.

The interactive CIWQS SSO database contains valuable information fields that should not be limited or removed. However, the default search screen forces users to choose between 1 of 4 sewage spill categories (SSO Cat 1, SSO Cat 2, PLSD Cat 1 or PLSD Cat 2). A choice should be added to the dropdown window that allows users to choose all categories if desired.

Sincerely,

Larry Brenner
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