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Subject: Comment letter- "SSO Reduction Program Review Update"

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

The following comments are being submitted for the Sewer Maintenance Districts of Los Angeles County, based on the discussions of Tuesday September 15, 2009, Public Meeting held at the Orange County Sanitation Districts' facility:

- 1) The current regulations exclude public agencies with less than 1-mile of sewers from registering because those systems pose minimal threat to the public and environment due to sewer spills. Similarly, private laterals spills pose minimal threat to the public and environment and the reporting of those spills should continue to be voluntary.
- 2) The current regulations should be modified to require reporting of sewer spills based upon spill event and not on spill location. This will eliminate the multiple reporting of spills from a single sewer event.
- 3) As noted in the States analysis of the reported spills to date the greatest impact on the environment is coming from those spill events that exceeded 50,000 gallons. The State should focus their attention on addressing those events first to have the most positive impact under the regulations.
- 4) The State should not mandate operator certification. The operation and maintenance of a wastewater collection system varies greatly depending on geographical location, design, flow, influence of groundwater infiltration, etc. A generalize operator certification program will do little to teach sewer maintainers the proper operation and maintenance of their individual sewer system. Hands on training is the best approach. If a operator certification program is implemented the State needs to allow each agency to develop their own in-house operator training certification program.
- 5) The initial priorities of the State and Regional Boards under the upcoming State Board Enforcement Plan should be to ensure the enrollment of all owners/operators covered under the General Order and the audit of SSMP's.
- 6) Additional or changes to the existing SSMP requirements is not necessary at this time. The State and regional Boards should allow additional two to three years for the effectiveness of each element of the SSMP to be evaluated. After the evaluation changes deemed necessary could be recommended for implementation prior to the first recertification of the SSMP by enrollees Governing Boards now scheduled for fifth year from the original certification date.

If you have any questions, please call me. I can be reached at (626) 300-3382 or by e-mail at nagbobu@dpw.lacounty.gov.

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