

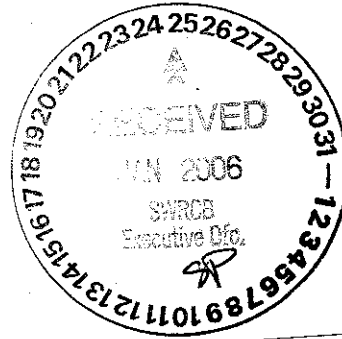


AKM Consulting Engineers

553 Wald
Irvine, CA 92618

Telephone: 949.753.7333

Facsimile: 949.753.7320



Water
Resources

Transportation

Infrastructure

Construction
Management

SSO Hearing: 2/8/06

January 25, 2006

State Water Resources Control Board

Executive Office

1001 I Street, 24th Floor

Sacramento, California 95814

Attention: Selica Potter
Acting Clerk to the Board

Subject: **Comment Letter-1/19/06 Public Hearing for SSORP**

Honorable Members of the Board:

I would like to thank you for the opportunity to comment on this most important issue for the State of California.

Having been involved in the preparation of several Sewer System Management Plans for compliance with the Santa Ana Regional Board's Waste Discharge Requirements, we have witnessed the many significant benefits of the program. The efforts of the Santa Ana Regional Board and Mr. Ken Theisen laid the foundation for the work completed by the Statewide SSO Guidance Committee. Messrs. John Norton and Brian Brock led the Committee's work efficiently and professionally to develop an excellent draft document with input from many diverse and sometimes conflicting stakeholders. As a professional Civil Engineer, I support the adoption of the proposed Statewide General Waste Discharge Requirements (SGWDR's) with consideration of the comments listed below:

1. Under Regulatory Considerations on page 3 of 19, SGWDR's should state that sanitary sewer overflows are not subject to minimum mandatory penalties, but the California Water Code provides for penalties for unauthorized discharges, similar to paragraph 10.e of the preamble of Santa Ana Region's Order No. R8-2002-0014 (page 5 of 18).
2. The SGWDR's should include similar language as Order No. R8-2002-0014 with respect to containing sewage within the storm drain system stating "The use of the storm drain pipe system to contain the sewage by blocking the drain pipes, and recovering and cleaning up the spilled sewage,

State Water Resources Control Board

January 25, 2006

Page 2

in order to prevent the sewage from being discharged to a surface water body, is not a violation of this Order.”

3. Condition assessment of collection systems with the use of CCTV inspections, and formulating sewer system rehabilitation plans are essential elements of a proper operation and maintenance program. While these are included in the SGWDR's Provision 13 (iv) (c), I recommend that it be a separate deliverable under the SSMP, as was done in Region 8 (Sewer System Rehabilitation Plan). Our experience with Region 8's WDR's indicates that this issue needs to be planned properly from the start of the program and followed through to completion. Having a separate deliverable will point out its importance, and maintain proper focus on it.
4. Tied to comment no.3 above, I recommend that this deliverable (Sewer System Rehabilitation Plan) be given a longer duration for completion than the Operation and Maintenance Program, at least the same duration as the System Evaluation and Capacity Assurance Plan. I believe that since the SGWDR's will apply to all public entities that own and operate sanitary sewer systems, numerous such entities will be competing for the same services throughout the State within a very limited time span, including the services of CCTV inspection companies.
5. I recommend that the completion dates for all entities with population over 2,500 be the same as that currently proposed for the entities with population between 2,500 and 10,000. While it may be thought that the larger entities would have better resources to meet the currently proposed schedules, larger systems are usually more complex and will again have to compete for the same services. They should not be disadvantaged because of their size.

Thank you for consideration of these comments. I will not be able to attend the public hearing scheduled for February 8, 2006, but can be reached at (949) 753-7333 x120 or via e-mail at zkayiran@akmce.com, if you have any questions regarding these comments.

Very truly yours,



Zeki Kayiran, P.E.

Principal

AKM Consulting Engineers

553 Wald

Irvine, California 92618

