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ONTARIO MUNICIPAL UTILITIES COMPANY

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January 17, 2013

Russell Norman
SSO Reduction Program
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Comments on Proposed Changes to Sanitary Sewer System Waste Discharge Requirements Monitoring and Reporting Program.

Dear Mr. Norman:

On behalf of the Ontario Municipal Utilities Company, we appreciate the opportunity to comment on the proposed modifications to the Sanitary Sewer System (SSS) Waste Discharge Requirements (WDRs) Monitoring and Reporting Program (MRP). The Ontario Municipal Utilities Company maintains and operates the sewer collection system serving the City of Ontario. We are committed to the effective implementation of the SSS WDR, and have been an active partner with the State Water Resources Control Board (State Water Board) in facilitating the order. However, we have some concerns regarding the recently issued draft MRP, including:

▪ Section B.1. of the draft MRP states:

“For any SSO greater than or equal to 1000 gallons that results or may result in a discharge to a surface water of the state, either directly or by way of a drainage channel or separate municipal storm drain system, the enrollee shall, as soon as possible, but not later than two (2) hours after (A) that enrollee has knowledge of the discharge by discovery or receiving information from a public informant or other source(s), (B) notification is possible, and (C) notification can be provided without substantially impeding cleanup or other emergency measures, notify the California Emergency Management Agency (Cal EMA) and obtain a notification control number.”

Based the summary matrix in Section A, this should have read, “For any **Category 1** SSO greater than or equal to 1000 gallons...”. By specifying Category 1, PLSDs are excluded from this requirement, since Category 1 SSOs result from a failure in the enrollee’s system.

If this was not the intent, and enrollees are actually required to report PLSDs >1000 gallons to CalEMA within 2 hours, then that reporting requirement should have been added to the summary matrix in Section A.

- There is a reference to "State Water Quality Control Board" on page 2 of the draft MRP. This should be revised to state "State Water Resources Control Board".

The City of Ontario supports a number of the changes to the MRP originally proposed in early 2012. For example, we support the delineation of the two existing overflow categories into three, clarification of the event-based approach to reporting, and clarification that agencies should only contact CalEMA for immediate reporting. We request that the proposed amendments to the MRP be revised based on the comments above.

We appreciate the opportunity to provide comments on proposed changes to the MRP, and look forward to working with State Water Board staff in the future on issues related to the SSS WDR. Please contact me at (909) 395-2661 if you would like additional information regarding our comments.

Sincerely,



Alisa Hasbrouck
Environmental Programs Manager