



**PADRE DAM**  
Municipal Water District

An Everyday Essential

January 22, 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 (SSS) Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP)**

Dear Mr. Norman:

On behalf of Padre Dam Municipal Water District, we appreciate the opportunity to comment on the recently released proposed modifications to the Sanitary Sewer System (SSS) Waste Discharge requirements (WDRs) Monitoring and Reporting Program (MRP). Padre Dam MWD operates and maintains a collection system with approximately 15,200 connections serving over 70,000 customers in the City of Santee and a portion of El Cajon. Our system consists of 165 miles of collections pipe and we also operate and maintain the Ray Stoyer Water Recycling Facility which treats two million gallons of wastewater per day. With limited budgets, our staff continues to maintain the collection system with aggressive maintenance schedules. Increasing the workload with administrative tasks results in staff being pulled from the important maintenance work we have been committed to in order to reduce sewer overflows. We are committed to the effective and appropriate implementation of the SSS WDR, and through our membership in the California Association of Sanitation Agencies (CASA), we have been an active partner with the State Water Resources Control Board (State Water Board) in facilitating understanding of, and compliance with, the order. Padre Dam Municipal Water District supports CASA's comments on the proposed amendments to the MRP, and incorporates those comments by reference.

Our primary concern is that the proposed amendments constitute a broad and significant revision of the MRP, contrary to both State Water Board direction and prior representations to stakeholders regarding the cleanup nature of the amendment process. Though the current version of the MRP has been narrowed from the prior draft, the proposed revisions remain extensive. Many of the proposed changes do not fall within the limited scope of an MRP and create new policy or substantive requirements, which should only be imposed through amendments to the WDR itself. For example:

- The amount of information required for the 2-hour reporting requirement is significant, and in most cases entirely impractical for reporting entities;

BOARD OF DIRECTORS  
Douglas E. Wilson  
Auggie Scatena  
Bill Pommeroy  
August A. Cairns  
James Penley

9300 Fante Parkway  
Santee, CA 92071  
T 619 448 3111  
F 619 449 9669  
www.padredam.org  
PO Box 719003  
Santee, CA 92072-9003

State Water Resources Control Board

Re: Comments on Proposed Amendments to SSS WDR MRP

January 22, 2013

Page 2

- The new time limit of 120 days to amend a Sanitary Sewer Overflow (SSO) report inhibits the ability of entities to report the most accurate spill volumes possible after a complete investigation into the facts and circumstances surrounding an SSO;
- The new technical report and monitoring program required for all SSOs greater than 50,000 gallons is incredibly burdensome and is a significant new requirement;
- The new, extensive requirements in the revised MRP will result in agency staff devoting their limited time and resources to simply compiling more documentation, which does not achieve the intent of the SSS WDR and the MRP—to reduce SSOs.

Padre Dam Municipal Water District 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. Nonetheless, the changes noted above, as well as many others, are outside the scope of the MRP amendment process and are inappropriate. We request that the proposed amendments to the MRP be revised consistent with the specific language recommendations submitted by CASA.

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 Paul Clarke at 619-258-4746 or by email at [pclarke@padre.org](mailto:pclarke@padre.org) if you would like additional information regarding our comments/

Sincerely,



Paul Clarke

Operations Manager

Padre Dam Municipal Water District