

Public Comment
Sanitary Sewer System WDR
Deadline: 5/13/11 by 12 noon

General Manager
Richard H. Solbrig

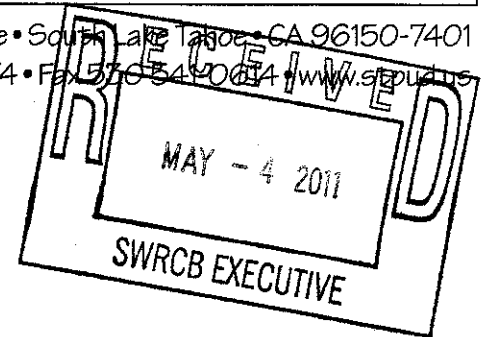
South Tahoe Public Utility District

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April 30, 2011

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



SUBJECT: State Water Board Staff Briefing on SSO WDR – for September 21 SWRBC meeting

Dear State Water Board:

I write on behalf of the staff and customers of the South Tahoe Public Utility District (District) and as a member of the California Water Environment Association (CWEA). I was both alarmed and dismayed when I learned that the SWRBC staff is under the impression that there is a "lack of availability of standardized training and certification programs," in relation to the GWDR-SSO

I am writing to correct the record so that you are aware that there is validated, standardized certification program in California, offering competency certification in Collection System Maintenance Certification and five other disciplines required to treat California's wastewater. Those programs have, and continue to be professionally provided by CWEA.

CWEA has a 73-year track record offering wastewater and collection systems programs and certifications that have been the benchmark for the wastewater industry and have set the bar higher in California than virtually any other state. By offering these education and certification programs as a public benefit organization; CWEA essentially reduces the government and tax burden while protecting public health and safety.

Further, the District **strongly opposes** the following elements proposed in the SSS WDR:

- The proposed SSS WDR would transform the existing enforcement discretion language, which expresses a clear statement of the State Water Board's intent regarding enforcement priorities and responses, into a purely advisory provision, which individual regional boards are free to follow or ignore as they choose.
- The SSS WDR is overly focused on private sewer laterals (PSL), requiring reporting of PSL spills by enrollees who have no authority over the privately owned laterals and requiring detailed information regarding the local lateral programs.
- The SSS WDR would include a new prohibition on the use of chlorine during spill cleanups, including any potential chlorine residual in potable water, this making it very difficult to wash down and fully disinfect SSO's on roads and other improved surfaces.
- Though not specifically included in the State Water Board staff proposal, the State Water Board is also seeking comment on whether to adopt a "hybrid" two-tiered approach to sanitary sewer systems. The result of such a change would be to subject local public agencies to

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additional citizen group lawsuits and higher administrative penalties with absolutely no demonstration that this would improve water quality or reduce SSO's. We strongly oppose such an approach and urge you do the same.

Finally, the District **supports** the following elements of the SSS WDR:

- Revisions to streamline spill notification points of contact
- Modifying applicability criteria to include a flow threshold (>25K gallons on any single day) and a pipe mileage threshold (>1 mile)
- Expanding coverage of the SSS WDR's to private collection systems meeting the pipe mileage and proposed flow threshold
- Clarifying the SSO's to land are not the focus of the SSS WDR

Thank you for your time and consideration.

A handwritten signature in black ink, appearing to read "D. Rise", with a stylized flourish at the end.

Dale Rise
President, Board of Directors
South Tahoe Public Utility District
South Lake Tahoe, CA