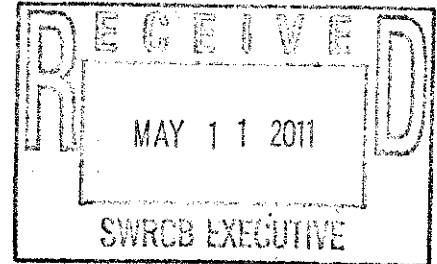




DEPARTMENT OF PUBLIC WORKS

May 11, 2011

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



Dear Ms. Townsend:

Comment Letter – SSS WDRs Review & Update

This letter is to inform you that the City of Pasadena received the revised Notice of Opportunity to Comment on the Draft Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDRs) dated April 22, 2011, related to proposed changes to Water Quality Order Nos. 2006-003-DWQ and 2008-002-EXEC. City staff reviewed the draft SSS WDRs, and offers the following comments on the changes proposed by the Board.

In the draft SSS WDRs, there is much more focus on private sewer laterals and private lateral sewer discharges (PLSDs). New categories have been added for PLSDs similar to the sanitary sewer overflow (SSO) categories for sewer mains, and there is a proposed mandatory requirement that the City be responsible for reporting PLSDs to the Board. Please note that in the City of Pasadena sewer laterals are fully owned and maintained by the private property owner, and City staff does not have jurisdiction over these facilities. In addition, the volume of wastewater associated with spills from private sewer laterals is typically much smaller than that from a sewer main. It is recommended that this requirement be reconsidered.

In the draft SSS WDRs, the discharge of chlorine used for disinfection and cleanup of wastewater spills is prohibited, and even includes chlorine residual from the potable water that is used for wash down and cleanup. This requirement will make it difficult to wash down and disinfect the roadway, sidewalk, or alley areas that may be affected by a sanitary sewer overflow. It is recommended that this requirement be reconsidered.

In the draft SSS WDR, there are changes to the Sewer System Management Plan (SSMP) requirements, which include but are not limited to: developing and implementing a staff assessment program, identifying critical system assets and maintaining replacement part inventories, including budgets to fund the sewer system in perpetuity, developing performance targets to reduce SSOs including requirements for annual reviews, reducing the

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online recertification period from every five years to every two years, and requiring changes to SSMP time schedules and record keeping. It is recommended that any changes to the current SSMP program be delayed to allow the SSMP program to be fully implemented and monitored statewide and to provide sufficient time so that a comprehensive evaluation of the current program can be performed.

In addition, there is discussion about regulating sanitary sewer systems under an NPDES Permit or a combined WDR/NPDES Permit instead of under the current WDRs only. This is an unnecessary change that will complicate the current SSO-reduction efforts of Enrollees, as most SSOs do not result in discharges to waters of the United States. It is recommended that the SSS WDR approach be continued, as it was only implemented within the last several years and appears to be effective in reducing SSOs.

Thank you for the opportunity to provide comments on the subject draft documents. If you have any questions, please feel free to contact Dan Rix, City Engineer, at (626) 744-4267, or Steve Walker, Principal Engineer, at (626) 744-4271.

Sincerely,



JULIE A. GUTIERREZ
Assistant City Manager/
Acting Director of Public Works