



City of Huntington Beach

2000 Main Street ♦ PO Box 190 ♦ CA 92648

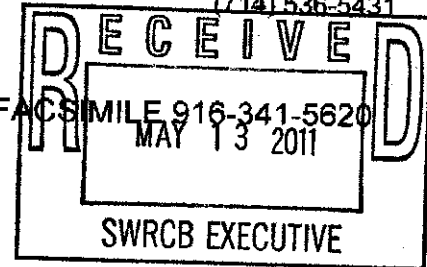
Travis K. Hopkins, PE
Director

Department of Public Works
(714) 536-5431

May 13, 2011

DELIVERED VIA FACSIMILE 916-341-5620
MAY 13 2011

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



Honorable Board Members:

Re: Comments Regarding Proposed Sanitary Sewer System Waste Discharge Requirements (SSS WDR)

The City of Huntington Beach is located in Orange County, has a population of 201,000 residents, and owns and operates a collection system with over 360 miles of sewer mains and 28 sewer lift stations. The City of Huntington Beach strives to meet or exceed all regulations governing the operation and maintenance of its public sewerage system and is committed to conserving our environment. The City supports comprehensive sewer system management and works with neighboring cities and sewer agencies in a regional effort to improve the performance of Orange County agencies.

We are requesting that the State Water Resources Control Board will consider scaling back some of the proposed revisions to the current SSS WDR regulations. The new SSS WDR seems intent on moving away from the reporting requirements guidelines; instead focusing on a very prescriptive order that dictates decisions regarding both the management and implementation of local sewer system programs.

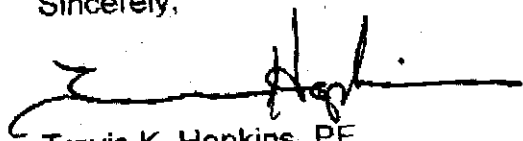
The City hereby submits the following comments on the proposed SSS WDR that would replace the existing statewide SSO WDR (Order No. 2006-0003-DWQ):

- The majority of the proposed provisions of the SSS WDR were not discussed at any of the state sponsored order review and data review committees dedicated to improving the WDR. There should be a guidance committee formed to provide dialogue and open discussion to fully understand the impact of the proposed provisions.
- The SSS WDR would include a new prohibition on the use of a residual-containing chlorinated water supply for spill cleanup and disinfection. This seems inconsistent with the desire to adequately mitigate spills and follow appropriate cleanup procedures for affected public infrastructure.

- Although it is the intent of the State Water Board that the SSS WDR is the primary regulation for sanitary sewer systems, individual Regional Water Boards may issue a more stringent or more prescriptive WDR for sanitary sewer systems. This two-tiered permit approach to NPDES issues is unfavorable and we oppose this alternative. The issuance of a more stringent and prescriptive WDR would take away from the uniformity of agencies complying with this order and would discourage agencies in different regions from collaborating to share knowledge and programs. However, improvements could be reached by the expansion of coverage of the SSS WDR's to private collection systems meeting the pipe mileage and proposed flow threshold. This will increase legal accountability and help foster a cooperative approach to future spill mitigation between the City and its larger private constituents. (i.e. HOA's)
- The definition of "surface waters of the state" should be expanded for clarification and a referral to a website for what constitutes "surface waters of the state" would be helpful.
- The requirement under Legal Authority which entails that each enrollee limits flows to the sanitary sewer system from connected sources, including service laterals and satellite collection systems, will be difficult to enforce unless a flow meter is installed at each site and a flow monitoring report is presented to the agency. Is this the intent of the State Water Board?
- Compliance with the proposed SSS WDR revisions may require increasingly greater staffing requirements at a time of current budget constraints and cuts.

I appreciate your consideration of my comments during this public comment period. Should you have any questions, please contact Dorien McElroy, 714-375-5040.

Sincerely,



Travis K. Hopkins, PE
Director of Public Works

TKH/BR:jg

Cc: Brian Ragland, Utilities Manager
Dorien McElroy, Wastewater Supervisor
Terri Elliott, Principal Civil Engineer
Todd Broussard, Principal Civil Engineer