

5/2/06 - Item 7
SSORP
Deadline: 4/24/06



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Water Resources
Transportation
Infrastructure
Construction Management

April 24, 2006

State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, California 95814

Attention: Song Her
Clerk to the Board

Subject: Comment Letter-05/02/06 Board Meeting-SSORP

Honorable Members of the Board:

I would like to thank you for the opportunity to comment on this draft of the proposed Statewide General Waste Discharge Requirements.

I appreciate the inclusion of a specific Rehabilitation and Replacement Plan (Provision 13. (iv) (c)), that highlights system condition as a most important issue. However, I request that the schedule for completion of this plan be further considered.

A proper plan will have to be based upon closed circuit television (CCTV) inspection of the collection system. The information developed from the CCTV and other inspections will have to be evaluated to assess the condition of the system and formulate proper rehabilitation and replacement projects. This is a lengthy and costly process, particularly for the large systems.

For agencies serving populations of 10,000 and greater, the currently proposed schedule allows only 24 to 36 months from WDR adoption for completion of the Operation and Maintenance Program, which includes the Rehabilitation and Replacement Plan. Considering the fact that numerous agencies throughout the state will compete for the limited CCTV inspection services available, it is very likely that many agencies will not be able to fully comply with this requirement, despite their best efforts. During this period, many will need to develop the funding in order to pay for these services, which is another lengthy process. Therefore, I request that the Board approve a minimum duration of 45 months for all agencies for compliance with this requirement.

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Thank you for consideration of these comments. I can be reached at (949) 753-7333 x120 or via e-mail at zkayiran@akmce.com, if you have any questions.

Very truly yours,



Zeki Kayiran, P.E.

Principal

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