



Tri-TAC
Jointly Sponsored by:
League of California Cities
California Association of Sanitation Agencies
California Water Environment Association

October 2, 2012

Reply to:

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Russell Norman
SSO Reduction Program
State Water Resources Control Board
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Sacramento, CA 95814

Subject: Comments on Proposed Changes to Sanitary Sewer System (SSS) Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP)

Dear Mr. Norman:

The undersigned statewide associations (Associations) sincerely appreciate the opportunity to provide written comments on proposed administrative changes to the Sanitary Sewer System (SSS) Waste Discharge Requirements (WDR) Monitoring and Reporting Program (MRP) released in draft form by State Water Board staff on August 14, 2012. Our associations represent public wastewater agencies providing sewer collection, wastewater treatment, and water recycling services to millions of Californians. Our associations are committed to the effective and appropriate implementation of the SSS WDR and have been partners with the State Water Resources Control Board in facilitating understanding of and compliance with the order. We also appreciate the two Data Review Committee meetings that were held in late August, 2012 to obtain feedback in a workshop setting on the proposed MRP.

Our detailed comments on the proposed MRP are attached, in an underline/strikeout format with explanations in yellow-highlighting immediately following the changes. In summary, we have the following general comments about the proposed MRP:

- We support three of the proposed changes to the MRP. These are (1) delineating three categories of overflows in place of the current two, by dividing Category into two categories (new 1 and 2); (2) clarifying the event-based approach to reporting, and (3) clarifying that agencies should only contact CalEMA for immediate reporting.
- We also support the ability to conduct an SSMP audit electronically, provided the revisions indicated in the attached document are made to the SSMP audit program.
- The scope of the proposed revisions is very extensive. We are concerned that the revised draft MRP is going beyond the intent expressed by State Water Board members, which was not to change the WDR. Many of the proposed changes to the MRP create new policy or substantive requirements, which should only be imposed through amendments to the WDR, such as the proposed requirement to conduct sampling (now discretionary), the proposed requirement to prepare a Technical Report for every SSO of 50,000 gallons or greater, and the proposed requirement to require an assessment of the impacts of SSOs of 50,000 gallons or greater on

animal communities, plant communities, and appropriate ecosystems. These examples as well as other proposed changes are significant revisions to the SSO reduction program that go beyond the appropriate scope of the MRP.

- It is inappropriate to require all agencies to comply with significant new requirements when only a few agencies are reporting a significant number of overflows and overflows to surface waters. For example, it is recognized that only 2% of the overflows in California are more than 1,000 gallons. This is especially questionable, given that the proposed significant changes to the MRP are based on a handful of inspections by State Water Board staff.
- The intent of the SSS WDR and the MRP is to reduce SSOs. If the extensive requirements in the revised MRP are implemented, agency staff will be spending all their time and resources with compiling more documentation, which will divert resources that are being used to reduce SSOs. It is not clear to us how additional record keeping and reporting will help reduce SSOs, and adding these requirements at the very time that the State Water Board has directed staff to identify ways to reduce unnecessary monitoring and reporting burdens is particularly troubling.
- There is redundant information throughout the document, which usually results in inconsistencies and confusion. Particular points should be compiled and stated once in the document.
- There is a very large amount of additional information being requested in Appendices 1, 2, and 3. This new information would result in a significant burden on collection system agencies. Much of the information is not useful in the normal course of business, and is a waste of public resources. These appendices go too far in prescriptive requirements for agencies.

We understand that most of the proposed changes in the MRP were made in order to make the enforcement process easier for State Water Board staff. However, it is inappropriate to request this level of information from thousands of systems just in case there is an enforcement action. In addition, State Water Board staff already has plentiful information on which to target agencies for investigation and enforcement. For example, the Regional Water Boards have brought, and continue to pursue, many enforcement actions for sanitary sewer overflows with the current level of information being reported.

The associations emphasize that many of our comments are consistent with the Resource Alignment Initiative as directed by State Water Board members in Resolution No. 2011-0052. Thank you again for the opportunity to comment on the MRP. Please contact Bobbi Larson at (916) 446-0388 or blarson@casaweb.org or Monica Oakley at (925) 627-4100 or Moakley@rmcwater.com if you have any questions or need additional information.

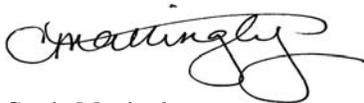
Sincerely,



Roberta Larson
Executive Director, CASA



Jackie Kepke
Vice Chair, Tri-TAC



Carrie Mattingly,
President, CWEA

WATER RESOURCES CONTROL BOARD
ORDER NO. 2012-XXXX-EXEC
AMENDING MONITORING AND REPORTING PROGRAM
FOR
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SANITARY SEWER SYSTEMS

Note to State Water Board Staff Reviewers: Edits in track changes mode indicated below are revisions to this draft document proposed by CASA/Tri-TAC and partners. Yellow-highlighted text is an explanation of the substantive comment directly above it (and in some cases if a small typo was found, the correction is also highlighted in yellow to make it easier to find). To avoid confusion with the original yellow-highlighting in the appendices, the original yellow-highlighting in the appendices was removed for this comment document.

The State of California, Water Resources Control Board (hereafter State Water Board) finds:

1. Sanitary sewer overflows (SSOs) discharged to waters of the ~~state~~ U.S. have a high potential to negatively impact beneficial uses of the waters of the ~~state~~ U.S..
References to surface waters throughout the MRP should be for waters of the U.S. and not waters of the state, since the prohibition in the WDR is for waters of the U.S.
2. The State Water Board is authorized to prescribe statewide general Waste Discharge Requirements (WDRs) for categories of discharges that involve the same or similar operations and the same or similar types of waste pursuant to Water Code 13263(i).
3. Water Code section 13193 requires the Regional Water Quality Control Boards (Regional Water Boards) and the State Water Board (collectively, the Water Boards) to gather comprehensive and specific SSO information and make this information available to the public, including but not limited to, SSO cause, estimated volume, location, date, time, duration, whether or not the SSO reached or may have reached waters of the ~~state~~ U.S., response and corrective action taken, and an enrollee's contact information for each SSO event. ~~An enrollee is defined as the public entity having legal authority over the operation and maintenance of, or capital improvements to, the sanitary sewer system.~~
The term "enrollee" is already defined in the WDR and should not be defined again (in any event this definition is different from the definition in the WDR and that is the precise reason it is not good to repeat definitions in a document).
4. On May 2, 2006, the State Water Board adopted Order No. 2006-0003-DWQ, "Statewide Waste Discharge Requirements for Sanitary Sewer Systems" (hereafter SSS WDRs) to comply with Water Code section 13193 and to establish the framework for the statewide SSO Reduction Program and provide a consistent statewide approach for reducing SSOs.
5. The SSS WDRs also require a Monitoring and Reporting Program (MRP), which includes specific SSO notification, reporting and record keeping requirements to replace other mandatory routine written reports for SSOs and to facilitate compliance monitoring and enforcement for violations.
Approximately 0.1% of wastewater conveyed through collection systems has resulted in an

~~SSO~~Nearly 100 million gallons of raw sewage have reportedly impacted surface waters since January 2007 based on enrollee reported data in the California Integrated Water Quality System (CIWQS) SSO Online Database,¹ ~~which supports the need for continuing regulatory controls.~~

We request that the State Water Board not sensationalize SSOs in a way that is not commensurate with the problem. In addition, many small SSOs would have reached surface waters but not impacted them.

6. Subsection G (2) of the SSS WDRs and the MRP both provide that the Executive Director may modify the terms of the MRP at any time. The MRP is intended to demonstrate compliance with the SSO WDR but not to expand the WDR.
7. On February 20, 2008, the State Water Board Executive Officer revised the original MRP adopted by the State Water Board on May 2, 2006 to rectify early notification deficiencies to ensure that first responders are notified in a timely manner for SSOs discharged into waters of the stateU.S.
8. When notified of an SSO that reaches a drainage channel or surface water of the stateU.S., the California Emergency Management Agency (Cal EMA), as part of its core functions, forwards the spill overflow notification information to local government agencies and first responders including local public health officials and the applicable Regional Water Board. Receipt of notifications for a single spill overflow event from both the spill overflow reporter and Cal EMA can create confusion at the local level. To address this, the spill overflow notification requirements added by the February 20, 2008 MRP revision are being eliminated in this MRP revision.
The associations request that the term "overflow" or "SSO" be used in place of "spill", which is a more industry standard term.
9. In the February 28, 2008 MOA between the State Water Board and the California Water and Environment Association (CWEA), the State Water Quality Control Board committed to re-designing the CIWQS SSO Database to allow "event" based spill overflow reporting versus the original "location" based design. Revisions to this MRP and accompanying changes to the CIWQS SSO Database will implement this change by allowing for multiple spill overflow appearance points to be associated with each spill overflow event caused by a single asset failure.
10. In prior versions of this MRP, spill overflows have been categorized as Category 1 or Category 2. This MRP implements changes to spill overflow categories by adding a Category 3 spill overflow type. This change will assist Water Board staff in evaluating high threat spill overflows and assist enrollees in identifying spill overflows that require Cal EMA notification by categorizing: (1) all high threat spill overflows greater than or equal to 1,000 gallons to surface water in Category 1, (2) high volume spill overflows greater than or equal to 1,000 gallons that do not reach surface waters in Category 2, (3) and low volume spill overflows that do not reach surface waters in Category 3.
The associations have broad support for the revisions described in Findings 9 and 10, which the changes indicated. Overflows less than 1000 gallons are not high threat regardless of overflow destination and should be included in Category 3.

¹ California Integrated Water Quality System (CIWQS), publicly available at: <https://ciwqs.waterboards.ca.gov/ciwqs/index.jsp>

11. Based on over six years of implementation of the SSS WDRs, the State Water Board concludes that the February 20, 2008 MRP must be updated to better advance the SSO Reduction Program objectives, assess compliance, and enforce the requirements of the SSS WDRs.
12. In response, the State Water Board has incorporated changes to monitoring, reporting, and record keeping in this MRP to improve compliance monitoring, enforceability, and data collection to address outstanding deficiencies.
13. The State Water Board has determined that the burden to the enrollees to comply with this Order, including any costs, bears a reasonable relationship to the need for the information to protect beneficial uses and reduce SSOs.

With our changes indicated in this document we can support this statement. Otherwise we cannot support this statement because there will be a significant burden to enrollees which will not bear a reasonable relationship to the need for the information to protect beneficial uses and reduce SSOs. Also, we understand that no economic analysis has been performed on the draft MRP and if our changes are not accepted we would insist that an economic analysis be prepared.

IT IS HEREBY ORDERED THAT:

Pursuant to the authority delegated by Water Code section 13267(f), Resolution No. 2002-0104, and Order No. 2006-0003-DWQ, the MRP for SSS WDRs No. 2006-0003-DWQ is hereby amended as shown in Attachment A.

Dated:

Thomas Howard
Executive Director

ATTACHMENT A
WATER RESOURCES CONTROL BOARD

ORDER NO. 2012-XXXX-EXEC

**AMENDING MONITORING AND REPORTING PROGRAM
FOR
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SANITARY SEWER SYSTEMS**

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A. INTRODUCTION

This Monitoring and Reporting Program (MRP) establishes monitoring, record keeping, reporting and public notification requirements for the statewide Sanitary Sewer Systems Waste Discharge Requirements (SSS WDRs), Water Quality Order No. 2006-0003-DWQ. The Executive Director may make revisions to this MRP at any time pursuant to the authority delegated by Water Code section 13267(f), Resolution No. 2002-0104, and as specified in subsection G(2) of the SSS WDRs. These revisions may include a reduction or increase in monitoring and reporting.

All site specific records and data pursuant to this MRP, including SSO event information and records, Collection System Questionnaire information, water quality monitoring data, Sewer System Management Plans (SSMP), and SSMP Program Audit information, shall be complete and accurate and justified-supported by evidence maintained by the enrollee. Failure to comply with this MRP may subject an enrollee to civil liabilities of up to \$5,000 a day per violation pursuant to Water Code section 13350, or may be referred to the Attorney General for civil action. The State Water Resources Control Board reserves the right to take any further enforcement action authorized by law.

B. SSO CATEGORIES

1. Category 1 SSO: Discharge of 1,000 gallons or greater of untreated or partially treated wastewater to waters of the U.S. resulting from a failure or flow condition in the enrollee's (publicly-owned) sanitary sewer system.
2. Category 2 SSO: Discharge of 1,000 gallons or greater of untreated or partially treated wastewater, from a failure or flow condition in the enrollee's (publicly-owned) sanitary sewer system, that does not reach waters of the U.S.
3. Category 3 SSO: All SSOs less than 1,000 gallons resulting from a failure or flow condition in the enrollee's (publicly-owned) sanitary sewer system. The enrollee responsible for the failure the SSO shall be responsible for complying with all requirements in this MRP, including notification, reporting, record keeping, and calculation of volume of the SSO.
4. Private Lateral SSO: All SSOs of any volume resulting from a blockage or other problem in a privately-owned privately-owned lateral sewer.

The associations believe it is important to have these category definitions shown early on in the revised MRP, similar to the existing MRP, so we request that they be moved to this location. As such, we also added back in the private lateral SSO definition.

We understand that the new Category 1 SSO was set up to truly have a category for those SSOs that are a high priority. We support that Category 1 should be reserved for those SSOs that are a high priority. SSOs less than 1,000 gallons are not a *high* priority. Therefore, this category should only include SSOs greater than 1,000 gallons, consistent with the California Code of Regulations.

The last sentence of these definitions previously on page 7 of 30, namely "The enrollee causing the SSO shall be responsible for complying with all requirements in this MRP, including notification, reporting, record keeping, and calculation of volume of the SSO" should not be included in the definition. That information is not SSO Category definition material.

C. SUMMARY TABLE OF MRP REQUIREMENTS

The table below provides a summary of the major requirements contained in this MRP:

ELEMENT	REQUIREMENT	METHOD
NOTIFICATION (Category 1 SSOs only; see section C, page 6)	<ul style="list-style-type: none"> Within 24 hours of becoming aware of a Category 1 SSO,² notify California Emergency Management Agency (Cal EMA) 	Call Cal EMA at: (800) 852-7550
REPORTING (see section C, page 6 and section D, pages 6-9)	<ul style="list-style-type: none"> Category 1 SSO: Submit Draft report within 3 business days of becoming aware of initiation of overflow response the spill and submit eCertified report within 15 business days Category 2 SSO: Submit Draft report within 3 business days of becoming aware of the spill initiation of overflow response and submit certified report within 15 business days of spill discovery Category 3 SSO: Submit Certified report within 30 days of the end of the month SSO occurred SSO Technical Report: If required, Certify within 30 days of SSO end-time "No SSO" Monthly Report:³ Certify by end of following month Collection System Questionnaire: Update and Certify every 12 months SSMP Program Audit: Conduct every 24 months 	Enter data into the CIWQS SSO Online Database (where required), certified by Legally Responsible Official. Self-maintained records shall be available during inspections or on request.
WATER QUALITY MONITORING (see section E, page 10)	<ul style="list-style-type: none"> Water quality sampling and initiation of an impact assessment within 48 hours after initial SSO notification for Category 1 SSOs at which 50,000 gallons or greater is not recovered from waters of the state U.S. 	Self-maintained records shall be available during inspections or upon request.
RECORD KEEPING (see section F, pages 10-13)	<ul style="list-style-type: none"> SSO records shall be maintained by the enrollee for a minimum of five (5) years Records to document SSO response including photographs of all SSOs. Records to demonstrate compliance with subsections D.7 through D.9 of the SSS WDRs. Records to document annual in-house training on the SSS WDRs, MRP, and SSMP for sewer crews, staff and management. Records to document Water Quality Monitoring, SSMP Implementation, SSMP Program Audits, and Electronic Records. 	Self-maintained records shall be available during inspections or upon request.

Please see detailed sections below for explanation of revisions in table.

² Notification to Cal EMA is not required for SSOs less than 1,000 gallons from publicly owned sanitary sewer system laterals consistent with California Code Regulations, Section 2250.

³ Formerly referred to as the "No-Spill" certification.

NOTIFICATION REQUIREMENTS: The following notification requirements are in addition to, and do not preclude, other emergency notification requirements and timeframes mandated by other state laws, regulatory programs, or agencies [e.g., storm water permits, local county health ordinances, environmental health departments, or Regional Water Quality Control Board Order(s)]:

1. For ~~any~~ SSOs 1,000 gallons or greater that reaches ~~or may reach~~ waters of the ~~state~~ U.S. (i.e., a Category 1 SSO), the enrollee shall, as soon as possible, but not later than two (24) hours after an enrollee arrives on location ~~becomes aware of~~ the SSO and confirms that an SSO is occurring or has occurred from a complainant, informant, or through self-discovery, notify the California Emergency Management Agency (Cal EMA) at (800) 8572-7550.

The 2-hour notification requirement is too stringent and State Water Board staff should re-evaluate this requirement. Agencies face many challenges during the first couple of hours of an SSO and need to focus on control and containment, as well as obtaining accurate information related to cause, location, fate, volume, etc. In addition, the clock should start (for the 4-hour reporting) after an agency arrives on the scene of the SSO, to make sure there is a real incident.

Also, it is completely unacceptable for an agency to report SSOs to CalEMA (or any agency) based only on a phone call from a party outside the agency. The agency staff need to confirm the existence and conditions of the SSO so they can provide useful information to CalEMA, including which Category of SSO it is. If the SSO was discovered by agency staff in person, then the clock would start ticking when they discover the SSO.

In order to prioritize phone calls to CalEMA, it is appropriate to only report Category 1 SSOs to CalEMA, and this approach is consistent with the CA Code of Regulations Title 23, Division 3, Chapter 9.2, §2250. It is also consistent with the standard associated with the encouragement to report SSOs from privately-owned sewer laterals (section 4 below).

2. The enrollee shall provide ~~at a minimum~~, the following ~~mandatory~~ information to Cal EMA before receiving a control number for each applicable SSO:
 - a. Name, title, and return telephone number of the Legally Responsible Official for the enrollee ~~contact notifying Cal EMA (if different than above).~~
 - ~~b. Name, title and return phone number of the on-scene contact person for the SSO event (if different than above).~~
 - e.b. _____ Enrollee's estimation of the SSO volume (gallons) already discharged and ongoing SSO discharge rate (gallons per minute, if ongoing) at time of arrival to the scene of the SSO by the crew responsible for containment of the SSO, if known.
 - d.c. _____ Indication of whether or not the SSO may have reached waters of the ~~state~~ U.S. and any known impacts at the time of the call, if known.
 - e.d. _____ Name(s) of the receiving water or drainage structure(s) ~~identified in subsection 1 above where SSO has occurred~~, if known.
 - f.e. _____ ~~Provide t~~he ~~best available information about the~~ location of SSO asset failure point, including street address (if applicable), city, county, and ~~if known~~, the GPS coordinates, to the extent known.

~~g.f. _____ Date and time the enrollee received information about this SSO from a complainant, informant, or through self-discovery (whichever was earliest) arrived on the scene and confirmed that an SSO was occurring.~~

~~h. Name, address, and telephone number of specific complainant, informant, or enrollee staff who discovered the SSO (unless reported anonymously).~~

The information in the lettered sections above was edited for grammar, brevity, clarity, and consistency. The associations request that vague references to other sections of the document be avoided, since the meaning can be unclear which can result in confusion for agencies. It is inappropriate to provide any contact information to CalEMA other than the LRO, and it is inappropriate to report the information in item h. to CalEMA. In addition, the volume estimation, the fate of the SSO, and the name of receiving water or drainage structure, and the failure point (separate from the SSO location) is usually not known within 2 hours and these items should NOT be required to get a CalEMA control number.

3. Until such time as an enrollee certifies an SSO report in the CIWQS SSO Online Database, the enrollee shall provide update(s) to Cal EMA regarding ~~any~~ change(s) in the information required under subsections C(2) above if significantly different conditions are encountered than originally reported.

It's important to not waste CalEMA's time or the agencies' time with myriad updates to CalEMA, so the conditions under which updates would be made to CalEMA was clarified. Also, the associations request that consistent formatting for the word certify, certifies, certified, etc. be used throughout the document (normal text, not underlined or capitalized). Capitalization in a narrative infers shouting and should be reserved for headings or other non-objective, special cases.

4. Private Sewage Lateral Discharges: The enrollee is ~~strongly~~ encouraged to notify Cal EMA of any private sewer discharge(s) to waters of the ~~state~~U.S. equal to or greater than 1,000 gallons caused by failures or flow conditions within private (i.e., non-enrollee owned) sanitary sewers connected to the enrollee's sanitary sewer system. This includes discharges from sewer laterals, mainlines, pump stations, or other private sewer system assets.

The word "strongly" should be removed from paragraph 4, because this word is not necessary and infers something different from "encouraged," but doesn't specify what that is.

D. REPORTING REQUIREMENTS: The following reporting requirements are in addition to, and do not preclude, other emergency reporting requirements and timeframes mandated by other state laws, regulatory programs or agencies [e.g., storm water permits, local county health ordinances, environmental health departments, or Regional Water Quality Control Board Order(s)]:

1. **CIWQS SSO Online Database Account:** All enrollees shall obtain an SSO Online Database account and receive a "Username" and "Password" by registering through the CIWQS.⁴ These accounts allow controlled and secure entry into the CIWQS SSO Online Database.

⁴ Assistance is available at CIWQS@waterboards.ca.gov, or by calling 1-866-792-4977 from 8:00 A.M. to 5:00 P.M.

2. SSO Mandatory Reporting Information: For reporting purposes, if one SSO event results in multiple appearance points, the enrollee shall complete one SSO report in the CIWQS SSO Online Database, and shall report the location of the SSO failure point, blockage or location of the flow condition that caused the SSO, in the CIWQS SSO Online Database, including all the discharge points associated with the SSO event that the enrollee is aware of. ~~In addition, all certified report information in the CIWQS SSO Online Database shall be justified by all available information, including but not limited to documentation and observations obtained from complainant(s), informant(s), field SSO response crew(s), telemetry data, or any other available relevant sanitary sewer system data.~~
The associations support this clarification in the MRP regarding event-based SSO reporting, and recommend a revision to acknowledge that there might be uncertainties in the investigation. In addition, the last sentence is not appropriate for this section.

3. Definitions:

- a. ~~**Category 1 SSO:** Discharge of any volume of untreated or partially treated wastewater to waters of the state resulting from a failure or flow condition in the enrollee's (publicly-owned) sanitary sewer system. The enrollee causing the SSO shall be responsible for complying with all requirements in this MRP, including notification, reporting, record keeping, and calculation of volume of the SSO.~~
- b. ~~**Category 2 SSO:** Discharge of 1,000 gallons or greater of untreated or partially treated wastewater, from a failure or flow condition in the enrollee's (publicly-owned) sanitary sewer system, that does not reach waters of the state. The enrollee causing the SSO shall be responsible for complying with all requirements in this MRP, including notification, reporting, record keeping, and calculation of volume of the SSO.~~
- c. ~~**Category 3 SSO:** All SSOs less than 1,000 gallons that do not reach waters of the state resulting from a failure or flow condition in the enrollee's (publicly-owned) sanitary sewer system. The enrollee responsible for the failure the SSO shall be responsible for complying with all requirements in this MRP, including notification, reporting, record keeping, and calculation of volume of the SSO.~~

Please see A. INTRODUCTION page for an explanation related to the revisions for category definitions.

4.3. Reporting Timeframes to CIWQS SSO Online Database:

- a. ~~**DRAFT Category 1 SSO Report:** The enrollee shall submit a DRAFT-draft Category 1 SSO report in the SSO Online Database no later than within three calendar business days ~~(72 hours)~~ after the enrollee arrives on location at the SSO and confirms that an SSO is occurring or has occurred ~~is made aware of an SSO, based on information received from a complainant, informant or through self-discovery (whichever is earliest)~~. The minimum information required~~

in a ~~DRAFT-draft~~ Category 1 SSO report shall include ~~all~~ information identified in Appendix 1, section A.

The reporting timeframe when it is less than a month should remain the same as in the existing MRP, which is based on business days, not calendar days. Also, this language should be consistent with the summary table. The information submitted to CIWQS should be that information the agency deems reliable, and the agency has the sole responsibility to determine the sources of that information. It is inappropriate to require that information be based on particular sources.

- b. **CERTIFIED Category 1 SSO Report** - The enrollee shall certify the Category 1 SSO report in the SSO Online Database ~~no later than~~within 15 ~~calendar~~business days after the SSO end time. The minimum information required in a ~~CERTIFIED-certified~~ Category 1 SSO report includes ~~all~~ information identified in Appendix 1, section B.
- c. **DRAFT Category 2 SSO Report:** The enrollee shall submit the ~~DRAFT-draft~~ Category 2 SSO report in the SSO Online Database ~~no later than~~within three ~~calendar~~business days (~~72 hours~~) after the SSO end time. The minimum information required in a ~~DRAFT-draft~~ Category 2 SSO report shall include ~~all~~ information identified in Appendix 1, section C.
- d. **CERTIFIED Category 2 SSO Report:** The enrollee shall certify the Category 2 SSO report in the CIWQS SSO Online Database ~~no later than~~within 15 ~~calendar~~business days after the SSO end time. The minimum information required in a ~~CERTIFIED-certified~~ Category 2 SSO report shall include ~~all~~ information identified in Appendix 1, section D.
- e. **DRAFT Category 3 SSO Report:** No draft report is required for a Category 3 SSO.
- f. **CERTIFIED Category 3 SSO Report:** The enrollee shall certify the Category 3 SSO report in the SSO Online Database within 30 ~~business~~calendar days after the end of the month in which the SSO occurs. The minimum information required in a ~~CERTIFIED-certified~~ Category 3 SSO report shall include all information identified in Appendix 1, section F.
- ~~g. **SSO Technical Report:** The enrollee shall append a Technical Report for any SSO in which 50,000 gallons or greater are not recovered from waters of the state within 30 calendar days after the SSO end time. The minimum information required in a SSO Technical Report shall include all information identified in Appendix 1, section G.~~
- This new report for SSOs is too large a burden for agencies and is duplicative with other reporting requirements. Since a Water Board may ask for more information under an enforcement action in any event, this type of activity should not be part of the routine program.
- ~~h-g.~~ **“No SSO” Monthly Report:**⁵ In a month in which no SSO occurs, the enrollee shall certify a “No SSO” Monthly Report in the CIWQS SSO Online Database by the end of the following calendar month. The “No SSO” Monthly Report shall include all information identified in Appendix 1, section H.

⁵ Formerly referred to as the “No-Spill” certification.

i.h. Amended SSO Reports: The enrollee may update or add additional information to a certified SSO report with information that became available after the original report was submitted, no later than 90 calendar days after the SSO end time by amending the report or by adding an attachment to the SSO report in the SSO Online Database. SSO reports certified in the SSO Online Database prior to the adoption date of this MRP may only be amended up to 90 days after the amendment date of this MRP.

There should not be a time limit on amending SSO reports, because if an agency becomes aware of information at a later date than when the report was submitted, it is appropriate to amend the report, regardless of when the information became available. This approach is consistent with the existing MRP.

5.4. Private Lateral Sewage Discharge Reports: The enrollee is encouraged to voluntarily report to the CIWQS SSO Online Database ~~all~~ discharges from private sewer system assets connected to the enrollee's sanitary sewer system that the enrollee becomes aware of. The enrollee will not be held responsible for the cause or cleanup of the private sewer discharge, or the repair of the private sewer system asset. The enrollee is also encouraged to provide notification to Cal EMA, if warranted. If a private sewer discharge is recorded in the CIWQS SSO Online Database, the enrollee shall identify the discharge as caused by a private sewer system asset, and a responsible party (other than the enrollee) should be identified, if known. The enrollee ~~should be encouraged to~~ report as much data as possible given the available information. A report of a private sewer lateral discharge does not require certification. If, in any month, the enrollee reports a private sewer discharge but has not experienced any SSOs, the enrollee shall still certify a "No SSO" Monthly Report (in accordance with subsection D (4) (h) above).

6.5. CIWQS SSO Online Database Unavailability: In the event that the CIWQS SSO Online Database is not available, the enrollee shall enter ~~all~~ required information into the database as soon as the CIWQS SSO Online Database becomes available on the next business day. In the unlikely event that the online database is unavailable for more than one day, enrollees should check daily (starting with the next business day) for database availability. If deadlines for online reporting are impossible to comply with due to unavailability of the online database, this information will be taken into consideration in an enforcement action, as applicable. Enrollees are encouraged to document the timing considerations in these situations for this purpose.

The associations request further clarification in the event the online database is not available, and we've provided some suggested language for this purpose.

7.6. Collection System Questionnaire: The Collection System Questionnaire (Questionnaire) required under subsection G of the SSS WDRs provides the foundation to evaluate system site-specific information, compliance, SSMP implementation, and performance in eliminating and/or reducing SSOs. Information in the Questionnaire may ~~be~~ also be utilized in completing SSMP Program Audits required in subsection D.13(x) of the SSS WDRs.

a. Existing enrollees: shall certify the mandatory information in Appendix 2 by July-December 31, 2013, and shall update the Questionnaire at least every 12 months thereafter.

b. New enrollees shall certify the mandatory information in Appendix 2 within 30 calendar days of initial enrollment and shall update the Questionnaire at least every 12 months thereafter.

The associations request that additional information be provided in the next fiscal year for proper planning.

~~8.7.~~ **Mandatory SSMP Internal Program Audits:** To satisfy compliance with subsection D.13(x) of the SSS WDRs for SSMP Program Audits, the enrollee shall include, at a minimum, ~~all~~ mandatory information identified in Appendix 3.

E. WATER QUALITY MONITORING REQUIREMENTS: To comply with subsection D.7(v) of the SSS WDRs, the enrollee ~~shall~~ is encouraged to develop and implement a Water Quality Monitoring Program to ~~assess sample impacts from large,~~ unrecovered SSOs greater than 50,000 gallons to waters of the ~~state~~ U.S. (hereafter, SSO Monitoring Program). However, sampling should only be conducted when it is safe to do so. The SSO Monitoring Program, shall, at a minimum:

1. Comply with Water Code section 13176 requiring analyses to be performed by an accredited or certified laboratory.
2. ~~Require Use~~ monitoring instruments and devices to implement the SSO Monitoring Program that are properly maintained and calibrated as necessary to ensure their continued accuracy.
3. ~~Assess the impacts of SSOs in which 50,000 gallons or greater may have been discharged, but not recovered, to waters of the state, Conduct sampling~~ within 48 hours of ~~initial~~ when the agency arrives on location at the SSO and confirms that an SSO is occurring or has occurred notification of such a possible SSO from a complainant, informant, or through self-discovery (whichever is earliest). If desired, the enrollee can coordinate with other agencies (such as a public health department) to conduct the sampling. Sampling should only be conducted when it is safe to do so.
The associations generally support a new requirement for sampling of unrecovered SSOs greater than 50,000 gallons with the changes indicated, however there are other considerations that need to be worked out before this language is finalized, such as whether it is more appropriate for a County Public Health Department to conduct these activities, similar to beach monitoring and posting decisions.
4. Require water quality sampling for, at a minimum, the following constituents upstream and downstream of the SSO (if sufficient flow exists upstream):
 - a. pH
 - b. Temperature
 - c. Dissolved oxygen
 - d. Ammonia; and
 - e. ~~Appropriate B~~acteria indicator (for example: total coliform or fecal coliform or enterococcus or E. coli)
5. ~~Require initiation of an impact assessment to evaluate potential short-term and long-term impacts to beneficial uses to waters of the state, for:~~
 - a. ~~Public health~~
 - b. ~~Animal communities~~
 - c. ~~Plant communities; and~~
 - d. ~~Appropriate ecosystems~~

6. ~~Require completion of the impact assessment required in E(5) above, within 180 days of SSO end time.~~

~~The requirement for an impact assessment is completely inappropriate, not useful, and hugely burdensome for collection system agencies. Agency staff do not have this type of knowledge, and SSOs typically do not result in impacts other than public health impacts, which the chemical and bacteriological monitoring in Section 4 above would address. In addition, it would take significantly longer than 48 hours to procure services for this type of evaluation for a municipal government agency.~~

7. ~~Allow for additional monitoring should the Water Boards require it for an SSO(s) of any size.~~

~~This allowance is already covered in Section G of the SSS WDR and should not be repeated.~~

F. **RECORD KEEPING REQUIREMENTS:** At minimum, ~~the following SSO~~ records shall be maintained by the enrollee for a minimum of five (5) years and shall be made available for review by the Water Boards during an onsite inspection or through an information request:

1. **General Records:** ~~The enrollee shall maintain records to document compliance with all provisions of the SSS WDRs and this MRP for each sanitary sewer system(s) owned, including any required records generated by an enrollee's sanitary sewer system contractor.~~

~~Agencies do not have control over contractors in this regard. Although State Water Board staff specified in Vacaville that this applied to agencies who have contractors operating their collection system, it is redundant to create a separate line item since the agency is ultimately responsible for discharges regardless of operational relationship.~~

2. **SSO Records:** The enrollee shall maintain records for each SSO, including but not limited to:

a. ~~Records to demonstrate that the enrollee has complied with subsection D.7 of the SSS WDRs, including:~~

i. ~~Photographic evidence. All photographic evidence used to comply with this subsection shall document the extent of the SSO, field crew response operations, and shall show site conditions after field crew SSO response operations have been completed. The enrollee shall document the date, time, location, and direction of photographs taken; Photographs must be optional, not mandatory. It should be left to the agency's judgment as to whether photos would be useful documentation and how best to use photos. The first priority is to control and clean up the overflow. Some photos may not be useful, for example if an overflow occurred in a field with grass that is 3 feet high.~~

ii. ~~Complaint records documenting how the enrollee responded to all notifications of possible or actual SSOs, both during and after business hours, including complaints that do not result in SSOs. Each complaint record shall include the following information, at a minimum:~~

A. ~~Date, time, and method of notification.~~

B. ~~Date and time the complainant or informant first noticed the SSO.~~

C. ~~Narrative description describing the complaint.~~

D. ~~A statement from the complainant or informant, if they know, of whether or not the potential SSO may have reached waters of the state.~~

~~E. Name, address, and contact telephone number of the complainant or informant reporting the potential SSO (if not reported anonymously).~~

~~F. Follow-up return contact information for each complaint received (if not reported anonymously).~~

~~G. Final resolution of the complaint.~~

~~H.i. Work service request information used to document all feasible and remedial actions taken to comply with section D.7 of the SSS WDRs.~~

~~The information regarding complaint records is overly burdensome for an agency, and is too complicated for complainants. In addition, it may discourage the general public from reporting SSOs if they are going to be interrogated after reporting an SSO.~~

~~iii.ii. Document steps and/or remedial actions undertaken by enrollee, using all available information to comply with section D.7 of the SSS WDRs.~~

~~iv. Document how any estimation(s) of volume(s) discharged and recovered (if applicable) were calculated.~~

~~3. **SSMP Records:** The enrollee shall maintain the following records in its approved SSMP or attached thereto, and update the SSMP, as appropriate, when deficiencies or out of date element(s) are discovered when conducting Monitoring, Measurement, and Program Modifications activities (required in subsection D.13(ix) of the SSS WDRs) or following SSMP Program Audits (required in subsection D.13(x) of the SSS WDRs):~~

~~a. A change log to document all changes made to the SSMP since its last certification, indicating when a subsection(s) of the SSMP was changed and/or updated and who authorized the change or update.~~

~~b. All records necessary to demonstrate compliance with all mandatory elements specified in subsection D.13 of the SSS WDRs, including but not limited to:~~

~~i. Records and supporting evidence relied upon should the enrollee claim that any mandatory element(s) required in subsection D.13 of the SSS WDRs is not applicable to the enrollee's approved SSMP.~~

~~ii. Inspection records, testing records, and closed circuit television (CCTV) data related to properly operating, maintaining and managing all parts of the sanitary sewer system [subsection D.8 of the SSS WDRs].~~

~~iii. Records documenting that the enrollee is conducting in-house training on at least an annual basis on operations, maintenance, emergency response, the SSS WDRs, MRP, and the enrollee's SSMP to demonstrate compliance with subsections D.8, D.13(iv)(d) and D.13.(vi)(d) of the SSS WDRs. These records shall document training of staff, management, and contractors.~~

~~iv. Records of enforcement of the enrollee's legal authority to prevent illicit discharges into the sanitary sewer system [subsection D.13.(iii) of the SSS WDRs].~~

~~v. Inspection records documenting enrollee's routine preventive maintenance activities [subsection D.13.(iv)(b) of the SSS WDRs].~~

- ~~vi. Records documenting the enrollee's root control program [subsection D.13(iv) of the SSS WDRs].~~
- ~~vii. Records documenting development and implementation of an adequate sewer system rehabilitation and replacement program that identifies and prioritizes short term and long term rehabilitation actions to address deficiencies [subsection D.13.(iv)(b) of the SSS WDRs].~~
- ~~viii. Records for fats, oils, and grease or FOG Source Control Program including enforcement records required in section D.13(vii)(a) through (g) of the SSS WDRs.~~
- ~~ix. System Evaluation and Capacity Assurance and Capital Improvement Plan schedule, required under subsection D.13(viii)(d).~~
- ~~x. Communication Program records demonstrating compliance with subsection D.13(xi) of the SSS WDRs.~~
- ~~xi. Records relied upon for any significant program changes or updates to the SSMP [subsection D.14 of the SSS WDRs].~~

~~4. **SSMP Internal Program Audit Records:** To comply with subsection D.13(x) of the SSS WDRs, the enrollee shall maintain all records relied upon to conduct its SSMP Internal Program Audit as required by Appendix 3 in this Amended MRP.~~

~~5. **Sanitary Sewer System Electronic Records:** The enrollee shall maintain all records and data from any sanitary sewer system electronic monitoring device(s), including but not limited to:~~

- ~~a. Supervisory Control and Data Acquisition or SCADA records;~~
- ~~b. Alarm system(s) records;~~
- ~~c. Flow monitoring device(s) records; and,~~
- ~~d. Other electronic monitoring records used to estimate waste water level, flow rate and/or volume.~~

~~In addition to the specific comments above, this prescriptive documentation of actions taken is redundant with other requirements, is overly burdensome, and completely impractical for municipal agencies. There is already sufficient documentation of these activities during routine operations through use of CIWQS and the SSMP. Also, it is not appropriate to print out CCTV data, for example. Agencies should be using their resources to reduce and control SSOs, not create more paperwork to document information that already exists in a slightly different format.~~

G. CERTIFICATION REQUIREMENTS: The enrollee shall comply with the following minimum requirements:

1. All information required by the MRP to be reported into the CIWQS SSO Online Database shall be certified by a registered person designated as described in section J of the SSS WDRs (known as a Legally Responsible Official or LRO).
2. ~~The registered person(s) designated shall certify all required information and reports under the penalty of perjury laws of the state.~~
~~The certification statement is in the SSS WDR, which is not being changed.~~

3.2. The enrollee shall provide a current registered person(s) designated to enter and certify all required reports in the CIWQS SSO Online Database, including maintaining updated contact information for each current registered person(s). To add or change a designated registered person(s), the enrollee shall ~~submit a request to~~notify the State Water Board within 30 days of the addition or change. The enrollee shall ensure that a person who is no longer authorized by the enrollee is deactivated from obtaining access into the CIWQS SSO Online Database by calling (866)792-4977 or e-mailing help@ciwqs.waterboards.ca.gov within 30 days of the change. The associations request that the enrollee notify the State Water Board staff of designated registered person(s) changes, rather than have a back-and-forth request procedure, for efficiency.

CERTIFICATION

The undersigned Clerk to the Board does hereby certify that the foregoing is a full, true, and correct copy of an order amended by the Executive Director of the State Water Board.

Jeanine Townsend
Clerk to the Board

APPENDIX 1

NOTIFICATION, REPORTING, MONITORING, AND RECORD KEEPING REQUIREMENTS

WATER RESOURCES CONTROL BOARD

ORDER NO. 2012-XXXX-EXEC

AMENDING MONITORING AND REPORTING PROGRAM

FOR

STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR

SANITARY SEWER SYSTEMS

~~To comply with section G of the SSS WDRs, the enrollee shall enter the following minimum information in the CIWQS SSO Online Database for SSO notification, reporting, monitoring, and record keeping. All of the enrollee's information entered into the SSO Online Database, both before and after certification, will be archived. While it is understood that "draft" data [data not yet certified by the enrollee's LRO is preliminary, the enrollee should be prepared to justify to the Water Boards why data fields have been changed]. The enrollee shall use all available information to certify data that are complete, accurate, and justified by evidence maintained by the enrollee.~~

The associations request that the Appendices in general NOT be included in the MRP per se, because they are redundant, and too prescriptive. If the appendices are retained in the MRP, the associations request that the introductory language be concise and not redundant with information in other parts of the MRP or SSS WDR, consistent with the existing MRP. Enrollees are doing the best they can; it's not really that helpful to tell them to do the best they can.

A. DRAFT CATEGORY 1 SSO

1. SSO Confirmation: Was this an SSO or a Private Lateral Sewage Discharge (PLSD)? [An SSO is a discharge caused by condition(s) in the enrollee's sanitary sewer system, as defined by subsection A.1 of the Statewide Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ). A PLSD is a discharge caused by condition(s) within private (non-enrollee owned) sanitary sewers connected to the enrollee's sanitary sewer system, including private sewer laterals, private main lines, private pump stations, or other private (non-enrollee owned) sewer component(s).]
 2. ~~SSO Contact Information: Name, address, title, and telephone number of the contact person who can answer specific questions regarding this particular SSO. (name, address, title, and telephone #);~~
 3. ~~SSO Discovery Information: Name, address, and telephone number of complainant or informant, or enrollee staff who discovered the SSO (name, address, and telephone number);~~
- The above new items should be removed from the reporting list, consistent with comments and

explanations provided for the main body of the MRP. The Legally Responsible Official is the agency contact of record.

4.2. SSO Notification Confirmation:⁶

- a. Cal EMA control number (#).
- b. Were other agency(s) notified about this SSO? (yes/no)
- c. If yes to 4(b) above, name of agency(s) notified. [agency(s)]

~~d. If yes to 4(b) above, date and time when other agency(s) were notified. [date(s)/time(s)]~~
Agencies are only supposed to report to CALEMA now and the associations do not want additional work to be created for agencies. This information would be in agency files if needed.

5.3. Brief Narrative description of SSO Event: (narrative description)

- ~~a. Describe how the SSO event could have been prevented, or not, through proactive maintenance practices.~~

This new information should not be added to the list of items needing to be reported because the agency will most likely not have the information for the draft report by the deadline.

6.4. SSO Volume Estimation:

- ~~a. Estimated spill volume that reached a separate storm drain that flows to waters of the state. (gallons)~~
- ~~b. Estimated spill volume recovered from the separate storm drain that flows to waters of the state. (gallons)~~
- ~~c. Estimated spill volume that reached a drainage channel that flows to waters of the state. (gallons)~~
- ~~d. Estimated spill volume recovered from a drainage channel that flows to waters of the state. (gallons)~~
- ~~a. Estimated spill/overflow volume discharged directly to that reached waters of the state U.S.. (gallons)~~
- ~~e. Estimated overflow volume that did not reach waters of the U.S. (gallons)~~
- ~~f. Estimated volume discharged inside a building or structure. (gallons)~~
- ~~g. Estimated volume recovered from inside a building or structure. (gallons)~~

This new information should not be added to the list of items needing to be reported because it will require additional time and resources to complete and is not related to water quality impacts.

⁶ Notification to Cal EMA is not required for SSOs less than 1,000 gallons from publicly owned sanitary sewer system laterals consistent with California Code Regulations, Section 2250.

The agencies already have incentive to prevent this type of situation because of the liability for claims from property owners.

- h. ~~Estimated volume discharged directly to land. NOTE: Includes discharges directly to land and discharges to a storm drain system or drainage channel that flows to a storm water infiltration/retention structure, field, or other non-surface water location). (gallons)~~
- i. ~~Estimated SSO volume recovered from land. NOTE: Recovery amounts shall not include water used for clean up. (gallons)~~
- j.b. _____ Estimated Total Volume ~~Spill/Overflow~~ed. (gallons) [*auto calculated*]
- k.c. _____ Estimated total SSO volume recovered for entire SSO event. NOTE: Recovery amounts shall not include wash down water or other external water sources. (gallons) [~~auto calculated~~]
Even questions about overflow volume is excessive and will lead to confusion and inconsistent reporting that is not comparable. Also, the amount recovered should not be automatically calculated.

7.5. SSO Start and End Information:

- a. Date and time the enrollee ~~was confirms that an SSO is occurring or has occurred~~made aware of the SSO, based on information received from a complainant, informant or through self-discovery (whichever is earlier). (date/time)
- b. ~~Date and arrival time to the scene of the SSO by the crew responsible for containment of the SSO. (date/time)~~
The information in item b. should not be reported because it is superfluous, as described in comments in the main body of the MRP.
- c. ~~Estimated ongoing SSO discharge rate (if ongoing) at the time the crew responsible for SSO containment arrived at the scene of the SSO. (gallons per minute);~~
This field is not an existing field in CIWQS and is superfluous to the volume estimate.
- d.b. _____ SSO stop date and time. (date/time or ongoing)
- e.c. _____ Description of how SSO start date and time were calculated, includeing the date and time the ~~the enrollee was confirmed that an SSO was occurring or had occurred~~made complainant or informant first noticed the SSO, unless self-discovered. (narrative description)

8.6. Failure Point Location(s):

- a. Has an SSO(s) occurred at this location ~~since September 2, 2007~~in the last five years? (yes/no)
 - i. If yes, how many times? (#)
This should be a five-year period, consistent with the records retention requirement.
 - b. GPS coordinates of SSO failure location(s) [*latitude(s) and longitude(s)*] [~~link to SSO MAPPING TOOL HERE~~].
It is not practical to report GPS coordinates of an underground location. Expecting such implies a level of accuracy that's not feasible. For example if a blockage was part of the way between

two manholes, it would be more useful (and practical) to describe the approximate distance, rather than GPS coordinates.

~~e.b.~~ Description or address of SSO failure location(s). (*narrative description*)

~~d.c.~~ County. (*auto-populate*)

~~e.d.~~ City. (*auto-populate*)

~~f.e.~~ State. (*auto-populate*)

~~g.f.~~ Zip Code. (*auto-populate*)

~~h.g.~~ Regional Water Quality Control Board. (*auto-populate*)

~~i.h.~~ Select Sewer Asset Type at Failure Point:

- i. Air Relief Valve (ARV)/Blow-Off Valve (BOV)
- ii. Force main
- iii. Gravity mainline
- iv. Lower Lateral (Public)
- v. Manhole
- vi. Pump Station-Controls
- vii. Pump Station-Mechanical
- viii. Pump Station-Power
- ix. Siphon
- x. Upper Lateral (Public), and
- xi. Other Asset - Describe (*Narrative description*)

~~j.~~ If applicable, diameter of sewer pipe at failure point. (*inches or N/A*)

~~k.~~ If applicable, material of sewer pipe at failure point. (*select or N/A*)

~~l.~~ Estimated age of sewer asset at failure point. (*year constructed*)

The last three items will take extra resources for agencies and are overly burdensome.

9.7. SSO Appearance Point(s): NOTE: If a single failure produces an SSO that appears in multiple locations, the enrollee shall describe each location:

- a. Number of SSO appearance points. (#)
- b. Describe location of each appearance point. (*narrative description*)
- c. Enter GPS coordinates of each SSO appearance point or attach a sketch to illustrate the geographic location(s) of each SSO appearance point. (*narrative description*) and/or (*sketch in .PDF*)
- d. Select all asset(s) from which the SSO appeared: [*allow multiple selections*]:

~~i.~~ Combined Sewer Drain Inlet (combined sewer only)

The SSS WDR does not apply to combined sewer systems.

- ~~ii.i.~~ Force Main
- ~~iii.ii.~~ Gravity Mainline
- ~~iv.iii.~~ Inside Building or Structure
- ~~v.iv.~~ Lateral Clean Out (Private)
- ~~vi.v.~~ Lateral Clean Out (Public)
- ~~vii.vi.~~ Lower Lateral (Private)
- ~~viii.vii.~~ Lower Lateral (Public)
- ~~ix.viii.~~ Manhole
- ~~x.ix.~~ Pump Station
- ~~xi.x.~~ Upper lateral (Private)
- ~~xii.xi.~~ Upper Lateral (Public)
- ~~xiii.xii.~~ Siphon
- ~~xiv.xiii.~~ Other enrollee-owned sanitary sewer system structure – describe (*narrative description*)
- ~~xv.xiv.~~ Other Non-enrollee-owned sanitary sewer system structure – describe (*narrative description*)

10.8. SSO Response Activities:

- a. Brief description of SSO Response Activities. ~~(mandatory description)~~
- b. ~~Select all relevant SSO response activities from menu: (allow multiple selections)~~
 - ~~i. Cleaned up~~
 - ~~ii. Mitigated effects of SSO~~
 - ~~iii. Contained all or portion of SSO~~
 - ~~iv. Restored flow~~
 - ~~v. Returned all of SSO to sanitary sewer system~~
 - ~~vi. Returned portion of SSO to sanitary sewer system~~
 - ~~vii. Property owner notified~~
 - ~~viii. Other Agency notified~~
 - ~~ix. SSO still ongoing (for Draft reports only)~~
 - ~~x. Water quality sampling conducted~~
 - ~~xi. Impact assessment initiated~~
 - ~~xii. Inspected failure point using CCTV to determine cause~~
 - ~~xiii. Other — describe (narrative)~~

The brief description of the SSO response activities should be sufficient. Selecting from this list would be confusing and time-consuming, and not generate consistent data.

~~4.9.~~ Submit Draft SSO Report: To complete the Draft SSO report, the LRO or Data Submitter⁷ must select "Submit Draft" in the CIWQS SSO Online Database.

B. CERTIFIED CATEGORY 1 SSO

1. All fields in subsection A(1) through A(~~408~~), above.
- ~~2. Was a written report about this SSO submitted to the Regional Water Board? (yes/no)~~
- ~~3. Name(s) and title(s) of field SSO response member(s) and each member's role and responsibilities during the SSO event?~~
- ~~4. Describe how the volume estimations were calculated, including, at a minimum, the following information: (narrative)~~
 - ~~a. Name(s) and title(s) of staff providing the initial and final estimates of the volume of the SSO discharged, and the volume of SSO recovered (if any of the SSO was recovered).~~
 - ~~b. The methodology and type of data relied upon, including supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the SSO discharged and the volume of the SSO recovered (if any of the SSO was recovered).~~
 - ~~c. The methodology and type of data relied upon to estimate the SSO start time, on-going SSO rate at time of arrival (if applicable), and the SSO end time.~~

This new information is overly burdensome and in some cases redundant with items A(1) through A(8) and should be removed from the revised MRP.
- ~~5.2.~~ SSO Final Destination: (select all that apply)
 - ~~a. Ocean beach(es), and if selected, provide the following information:.~~
 - ~~i. Specify name of ocean beach(es). (name)~~
 - ~~ii. Were health warnings posted? (yes/no)~~
 - ~~iii. Did the SSO result in an ocean beach closure? (yes/no)~~
 - ~~iv. Entity responsible for closing ocean beach. (name or n/a)~~
 - ~~v. Number of days closed as a result of the SSO. (# or ongoing)~~
 - ~~vi. Visual inspection of impacted ocean beach(s). (narrative description)~~
 - ~~b. Building or Structure.~~
 - ~~c. Combined Storm Drain. (combined sewer only)~~
 - ~~d. Paved Surface.~~

⁷ A data submitter is any individual authorized by a LRO to enter data into the online sanitary sewer overflow (SSO) database on behalf of an agency enrolled under Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WQO No. 2006-0003).

~~e.d. _____ Separate Storm Drain, and if selected, provide the name, if know, of the storm drain system. (narrative description)~~

~~f.e. Drainage Channel, and if selected, provide the name, if known. (narrative description)~~

~~g.f. Street/Curb and Gutter.~~

~~h.g. _____ Waters of the state U.S. other than ocean, and if selected, provide the following information:~~

~~i. Specify name of water(s) of the state. (name)~~

~~ii.i. Is this water body used for contact recreation (e.g., beaches, swimming areas)? (yes/no)~~

~~iii. Is this water body used as a source of drinking water? (yes/no)~~

~~iv. Were health warnings posted? (yes/no)~~

~~v. Did the SSO result in the closure of the water(s) of the state? (yes/no)~~

~~vi. If yes, responsible entity closing waters of the state(s). (name)~~

~~vii. Number of days closed as a result of the SSO. (# or ongoing)~~

~~viii. Visual inspection of impacted water(s) of the state. (narrative description)~~

~~i.h. Unpaved Surface.~~

~~j.i. Other, and if selected, provide a brief narrative description. (narrative description)~~

~~This new information is overly burdensome for agencies and it should not be part of routine monitoring. Nor is it useful in reducing SSOs.~~

~~6.3. SSO Cause: (select all that apply):~~

~~a. Construction-Related Diversion Failure.~~

~~b. Air Relief Valve (ARV)/Blow-Off Valve (BOV) Failure.~~

~~c. Damage by others not related to sanitary sewer system.~~

~~d. Construction/maintenance.~~

~~e. Debris from Construction.~~

~~f. Debris from Private Lateral.~~

~~g. Debris – General.~~

~~h. Debris – Rags or nondispersible wipes.~~

~~i. Flow Exceeded Capacity due to wet weather event.~~

~~j. Flow Exceeded Capacity not due to wet weather event.~~

~~k. Fats, oils and grease (FOG) deposition.~~

~~l. Illicit Discharge to sanitary sewer system.~~

~~m. Natural Disaster - Describe the event and how it resulted in the SSO. (narrative description)~~

~~n. Non-flushable wipes.~~

~~o.n.~~ Sanitary sewer system operator error (Enrollee).

~~p.o.~~ Sanitary sewer system operator error (~~including e~~Enrollee Contractor/~~s~~Subcontractor).

~~q.~~ Pipe Structural Problem/Failure.

~~r.p.~~ Installation failure.

~~This item is too vague and will not yield meaningful data.~~

~~s.g.~~ Pump Station Failure – Controls.

~~t.r.~~ Pump Station Failure – Mechanical.

~~u.s.~~ Pump Station Failure – Power.

~~v.~~ Rainfall Exceeded Design and/or Inflow and Infiltration (I/I).

~~This item is redundant with option i.~~

~~w.~~ If yes to (i) or (u) above, describe the wet weather event and how it resulted in the SSO.
(narrative description)

~~x.~~ If yes to (i) or (u) above, specify time and duration of precipitation associated with this storm event:

~~i.~~ Inches per hour. (# of inches per hour)

~~ii.~~ Number of hours. (#)

~~This new information is overly burdensome and should not be part of routine reporting.~~

~~y.t.~~ Root Intrusion.

~~z.u.~~ Siphon Failure.

~~aa.v.~~ Surcharged Pipe.

~~bb.w.~~ Unknown - Describe (description).

~~cc.~~ Vandalism – Describe. (narrative description)

~~This item is redundant with item c.~~

~~dd.x.~~ Other – Describe. (narrative description)

7.4. SSO Cause Investigation:

a. Is there an ongoing investigation into the cause of this SSO? If yes: (yes/no)

~~i.~~ Provide reason(s) for ongoing investigation. (narrative description)

~~ii.~~ Expected date of completion of investigation. (date)

~~iii.~~ If investigation is complete, describe:

~~A.~~ Investigation conducted. (narrative description)

~~B.~~ Information known about possible cause(s). (narrative description)

~~This new information is overly burdensome and should not be part of routine reporting.~~

8.5. Corrective Action:

a. Was enforcement action taken against an illicit discharge in response to this SSO? (yes/no)

~~b. System modifications to prevent SSO from recurring at the same location: (Select all that apply)~~

- ~~i. Added asset to preventive maintenance program.~~
- ~~ii. Adjusted schedule/method of preventive maintenance.~~
- ~~iii. Plan rehabilitation or replacement of sanitary sewer asset.~~
- ~~iv. Inspected, repaired asset(s), or replaced defective asset.~~
- ~~v. Other — Describe. (narrative description)~~

This new information is overly burdensome and should not be part of routine reporting.

~~e.a.~~ To comply with Water Code section 13193 and subsection D.13(iv)(c) of the SSS WDRs, provide a description of the corrective action taken for any item(s) identified in 10(c) above. (narrative description)

9.6. Certification: To complete certified SSO report, the LRO select "Certify" in the CIWQS SSO Online Database: according to Provision J of the SSS WDR.

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) certify under penalty of law that I am (name), the actual person certifying this report in accordance with section J of the Statewide Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DW/Q).~~

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) certify under penalty of law that based on my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information reported herein, the information in this SSO report is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine or imprisonment for knowing violations." (YES=CERTIFY; NO=NOT CERTIFIED)~~

It is not appropriate to recreate the language in Provision J of the SSS WDR because repeating material will result in differences and/or errors.

C. DRAFT CATEGORY 2 SSO

A(1) through A(~~119~~), above, except A(~~42~~) above.

D. CERTIFIED CATEGORY 2 SSO

1. A(1) through A(~~108~~), above, except A(~~42~~) above.
2. B(~~42~~) through B(~~115~~), except B(~~9~~).

E. DRAFT CATEGORY 3 SSO

No draft report is required.

F. CERTIFIED CATEGORY 3 SSO

1. A(1) through A(~~108~~), above, except A(~~42~~) above.

2. B(42) through B(115), ~~except B(9).~~

~~**G. SSO TECHNICAL REPORT: The enrollee shall submit and certify an SSO Technical Report in the CIWQS SSO Online Database within 30 calendar days of SSO stop date and time for any SSO in which 50,000 gallons or greater are not recovered from waters of the state. This report, which does not preclude the Water Boards from requiring a more detailed analysis if requested, shall include, at a minimum the following:**~~

~~1. Causes and Circumstances of the SSO:~~

- ~~a. Complete and detailed explanation of how and when the SSO was discovered.~~
- ~~b. Maintain, as required by section D.7 of the SSS WDRs, service request documentation evidence used to document all steps and remedial actions. (yes/no)~~
- ~~c. Photographic evidence as required by subsection F.2 (a)(i) of the MRP shall document the extent of the SSO, field crew response operations, and reveal site conditions after field crew SSO response operations have been completed.~~
- ~~d. Diagram showing the SSO failure point, appearance point(s), and final destination(s);~~
- ~~e. Detailed description of the methodology employed and available data used to calculate the volume of the SSO and any recovery amounts.~~
- ~~f. Detailed description of the cause(s) of the SSO.~~
- ~~g. Historical maintenance records for the failure location.~~

~~2. Enrollee's Response to SSO:~~

- ~~a. Chronological narrative description of all actions taken by enrollee to terminate the discharge.~~
- ~~b. Explanation of how the SSMP Overflow Emergency Response plan was implemented to respond and mitigate the SSO.~~
- ~~c. Final corrective action(s) completed or projected, including a schedule for actions not yet completed.~~

~~3. Monitoring and Analysis of SSO:~~

- ~~a. Description of all water quality sampling activities conducted, including analytical results and evaluation of the results.~~
- ~~b. Detailed location map for any subsequent water quality sampling and reference point(s).~~

~~4. Impacts of SSO:~~

- ~~a. Name and contact information of the responsible person(s) conducting impact assessment.~~
- ~~b. Description of impact assessment to evaluate short- and long-term impacts to beneficial uses required in this Amended MRP.~~

~~5. Monitoring Information:~~

~~Sampling and impact assessment to evaluate short- and long-term impacts to beneficial uses of waters of the state (required for any Category 1 SSO in which 50,000 gallons or greater are not recovered from waters of the state):~~

- a. ~~Description of water quality sampling results. (narrative description)~~
- b. ~~Submittal of water quality data report(s). (upload .PDF in CIWQS)~~
- c. ~~Identify which regulatory agencies received sample results. (if applicable)~~
- d. ~~Date of expected results from impact assessment to evaluate potential short- and long-term impacts to waters of the state impacted by the SSO. (date)~~

6. ~~Financial Information:~~

- a. ~~Comprehensive Annual Financial Report information:~~
 - i. ~~Current Assets and Liabilities. (attach table in .PDF)~~
 - ii. ~~Operating Revenue and Expenses. (attach table in .PDF)~~

7. ~~Certification: To complete certified SSO report, the LRO must select "Certify" in the CIWQS SSO Online Database:~~

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) certify under penalty of law that I am (name), the actual person certifying this report in accordance with section J of the Statewide Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ).~~

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) certify under penalty of law that based on my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information reported herein, the information in this SSO Technical Report is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine or imprisonment for knowing violations." (YES=CERTIFY; NO=NOT CERTIFIED).~~

~~**This new report is overly burdensome and redundant with information already being submitted. It should not be part of routine reporting.**~~

~~**H. CERTIFIED MONTHLY "NO SSO"**~~

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) certify under penalty of law that I am (name), the actual person certifying this report in accordance with section J of the Statewide Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ).~~

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) am aware that an SSO is any overflow, spill, release, discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system as defined by Section A. 1. of the Statewide Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ).~~

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number), certify under penalty of law that based on my inquiry of the person or persons who manage this system, No SSO occurred from the sanitary sewer system in the month of (month/year). I am aware that there are significant penalties for submitting false information, including the possibility of a fine or imprisonment for knowing violations." (YES=CERTIFY; NO=NOT~~

CERTIFIED)

This section is not needed because the no SSO report is already mentioned earlier in the document.

I.G. PRIVATE LATERAL SEWAGE DISCHARGE REPORTS

If known, the enrollee is encouraged to report all private sewer discharges to the CIWQS SSO Online Database ~~preferably no later than~~ within 90 days ~~after of~~ the time and date that the enrollee is originally made aware of the discharge. At a minimum, the following information should be reported to the CIWQS SSO Online Database: (NOTE: certification of these reports is not required by the LRO.)

1. The address or most accurate location information known (e.g., GPS Coordinates) of the appearance point of the private sewer discharge.
2. Identification of the sewage discharge as a private sewage discharge.
3. Responsible party contact information (if known).
4. Cause (if known) of the private sewer discharge.

More friendly language should be used for an optional item.

DRAFT

APPENDIX 2
COLLECTION SYSTEM QUESTIONNAIRE REQUIREMENTS

WATER RESOURCES CONTROL BOARD
ORDER NO. 2012-XXXX-EXEC
AMENDING MONITORING AND REPORTING PROGRAM
FOR
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SANITARY SEWER SYSTEMS

To comply with section G of the SSS WDRs, the enrollee shall enter the following minimum information in the CIWQS SSO Online Database to complete the mandatory Collection System Questionnaire (Questionnaire). The enrollee shall use all available information to certify data that is complete, accurate and justified-supported by evidence maintained by the enrollee.

A. GENERAL INFORMATION

1. Waste Discharge ID (WDID) and official sanitary sewer system name: (WDID/name)
2. Sanitary sewer system category: (*municipal, park, school, military, hospital, prison, airport, port*).
- ~~3. Primary points of contact:
 - a. Onsite agency contact person for the sanitary sewer system (name, title, address, email and telephone number)
 - b. Is any aspect of the sanitary sewer system contract operated (e.g. CIWQS Reporting, Maintenance, etc.)? (yes/no)
 - i. If yes, provide contact information of contractor (name, title, address, email and telephone number).
 - ii. What is the contractor's scope of services?~~
- 4.3. _____ Population served by sanitary sewer system and population basis (# and select all that apply from menu).
- ~~5. Estimated service area (square miles).~~
- ~~6. Map showing sanitary sewer system service area boundaries (attach PDF image).~~
- 7.4. _____ Does this sanitary sewer system discharge to a wastewater treatment plant (WWTP) or separately enrolled sanitary sewer system? (yes/no)
 - a. If yes, list the appropriate names and WDIDs [list only WWTP information if sewer system discharges directly to the WWTP, otherwise list the name(s) and WDIDs, if known, for the sewer system discharged to and WWTP]. (Name, WDID, or Unknown)

- b. If no, list the name and WDID, if known, for the facilities discharged to that are not owned by your agency. (Name, WDID#, or Unknown)

~~8. Do separately enrolled sewer systems that are also owned by your agency discharge to this sewer system?~~

~~a. If yes, list the name and WDID for the sanitary sewer system(s). (Name, WDID)~~

~~b. If no, list the name and WDID, if known, for the facilities that are not owned by your agency tributary to this sanitary sewer system(s). (Name, WDID, or Unknown)~~

~~The State Water Board already has the WDID for an agency. It is overly burdensome to require agencies to indicate this number again.~~

~~9. Internet address where required SSMP can be downloaded; (link or N/A)~~

~~The SSS WDR does not require the SSMP to be available through a link and therefore it should not be in the MRP.~~

B. COMPLIANCE INFORMATION

~~4.2. _____ Since last questionnaire update:~~

~~a. Total number of possible SSO notifications received from complainants or informants. (#)~~

~~b. For B(1)(a) above, number of complaints responded to that were private sewer discharges. (#)~~

~~2. Location where records are available for inspection as required by subsection F in Attachment A of this MRP? (Description)~~

~~3. Have any additional sanitary sewer systems been acquired in the past 12 months, see Sections B.1 and H of the SSS WDRs? (yes/no)~~

C. ASSETS AND EQUIPEMENT INFORMATION

1. Estimated inventory of sanitary sewer system assets. [table]

2. ~~Diameters (inches)~~ and lengths (miles) of gravity sewer main lines and separate force main(s).

~~3. Age (effective year) and percentage (%) of gravity sewer main lines, separate force main(s) (%), individual pump station(s) rated at greater than 75,000 gallons/day (#), and individual pump station(s) rated at 75,000 gallons/day and less (#). (table)~~

~~4.3. _____ Estimated miles of sanitary sewer service laterals (upper and lower service laterals) connected to main line sewers. (miles)~~

~~5.4. _____ Portion(s) of sewer service laterals owned and/or maintained by enrollee. (upper, lower, upper and lower, none)~~

~~6. Does enrollee have an active financial assistance program for replacement of private sanitary sewer service laterals? (yes/no)~~

~~7. Estimation of number of system-wide sewer service lateral connections:—~~

~~a. Residential (#)~~

~~b. Commercial (#)~~

~~c. Commercial with Food Service Establishment (FSE) (#)~~

8.5. _____ For pump station(s) in C(1) above:

~~a. Number with less than one hour of hold time when not in operation. (#)~~

Pump station hold times are impossible to estimate due to the portion of the upstream gravity system that may or may not serve as storage.

~~b.a. _____ Number with permanently installed operational emergency backup generator. (#)~~

~~e.b. Number with supervisory control and data acquisition (SCADA). (#)~~

~~c. Number with built-in bypass capability (#)~~

~~d. and Number with portable generator connection ~~for portable generator~~. (#)~~

9.6. _____ Miles of aerial and/or underground sanitary sewer pipelines crossing waters bodies. (#)

10.7. _____ Number and miles of sanitary sewer siphons. (#/miles/ n/a)

~~11. Number of air relief valve(s) and/or blow off valves installed. (#)~~

~~12. Does your agency CCTV after a spill occurrence?~~

D. FLOW INFORMATION

~~1. Estimated volumes of sanitary sewer system source(s):~~

~~a. Residential sources. (MGD)~~

~~b. Commercial sources. (MGD)~~

~~c. Commercial sources with food service establishment. (MGD)~~

2.8. _____ Estimated sewer system flow characteristics:

Average Daily Dry Weather Flow (MGD)	Peak Daily Wet Weather Flow (MGD)
[Number]	[Number]
[Enter description of how information was derived (calculated from equivalent dwelling units (EDUs), flow measurement, etc.)]	[Enter description of how information was derived (calculated from EDUs, flow measurement, etc.)]

~~3. What continuous flow monitoring been performed and recorded in the past 12 months? Select all type(s) of flow monitoring done:~~

~~a. Monitoring for Capital Improvement Plan.~~

~~b. Monitoring for billing.~~

~~c. Other describe. (description)~~

E. STAFFING INFORMATION

1. ~~Levels of s~~Staff ~~dedicated full-time equivalents (FTEs) working onto~~ sanitary sewer system:
 - a. Entry level (#)
 - b. Journey (#)
 - c. Supervisory (#)
 - d. Managerial (#)
2. Numbers of staff with CWEA current Sanitary Sewer System Maintenance Certification working ~~ondedicated to~~ sanitary sewer system:
 - a. Grade I (#)
 - b. Grade II (#)
 - c. Grade III (#)
 - d. Grade IV (#)
3. For E (1), number of current ~~dedicated~~ Full Time Equivalent position vacancies for sanitary sewer system. (#)
4. Does enrollee require mandatory CWEA certification for ~~all dedicated sanitary sewer system~~the employees who work on the sanitary sewer system? (yes/none / some / all / it depends - provide explanation)
The word "dedicated" is too vague and a more quantitative term must be used to avoid confusion and non-useful data. Also, CWEA certification is not a yes/no issue. Some agencies have conditions, and also agencies should get credit if some of their employees are required to be certified. In addition, CWEA certification is not required, therefore this information should not be collected (or judged).

F. FINANCIAL INFORMATION

- ~~1. Number of billed sanitary sewer system connections. (#)~~
- ~~2. Average monthly household fees for sewage collection. (\$/month)~~
- ~~3. Sanitary sewer fee rate basis. (select: flat rate, water consumption, measured flows, etc.)~~
- ~~4.5.~~ Operations and maintenance expenditures on sanitary sewer system assets (most recent complete budget cycle past 12 months). (\$)
It's important to not generate new work for agencies on financial information, so the term must be the most recent complete budget cycle (such as (but not limited to) the most recent full fiscal year).
- ~~5. Rehabilitation and replacement expenditures on sanitary sewer system assets (past 12 months). (\$)~~
6. Capital improvement expenditures on sanitary sewer system assets (most recent complete budget cycle past 12 months). (\$)
- ~~7. Capital improvement budget for sanitary sewer system assets (current fiscal year). (\$)~~

G. CERTIFICATION

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) certify under penalty of law that I am (name), the actual person certifying this report in accordance with section J of the Statewide Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ.)~~

~~I, (name), the approved Legally Responsible Official (LRO) for sanitary sewer system (name and Waste Discharge ID Number) certify under penalty of law that based on my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information, the information in this Collection System Questionnaire is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine or imprisonment for knowing violations.”
(YES=CERTIFY; NO=NOT CERTIFIED)~~

This new information is overly burdensome and should not be part of the annual Questionnaire. agencies should be spending their limited resources on reducing and/or controlling SSOs, not on activities that will not help water quality. If anything, this information should only be part of a pre-inspection questionnaire, not part of routine programs.

APPENDIX 3

SSMP PROGRAM AUDITS

WATER RESOURCES CONTROL BOARD

ORDER NO. 2012-XXXX-EXEC

AMENDING MONITORING AND REPORTING PROGRAM

FOR

STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR

SANITARY SEWER SYSTEMS

This Appendix outlines ~~the mandatory recommended~~ information ~~that must to~~ be included in the enrollee's Sewer System Management Plan (SSMP) Internal Program Audits to satisfy compliance with subsection D.13(x) of the SSS WDRs. The enrollee ~~shall should~~ use ~~all~~ available information to ensure data ~~that~~ is complete, accurate, and ~~justified supported~~ by evidence maintained by the enrollee.

A. SSO HISTORIC DATA

~~1. Number of potential SSO service calls received since last SSMP Internal Program Audit.~~

This information is speculative and SSOs not confirmed by agency staff should not be reported. Much of the information being requested anew deviates significantly from the intent of the internal audit, which should focus on the SSMP and whether improvements are necessary. More specific comments are shown below.

- ~~2.7.~~ Number of SSOs reported since last SSMP Internal Program Audit.
- ~~3.8.~~ Reported total volume of unrecovered SSOs since last SSMP Internal Program Audit.
- ~~4.9.~~ Reported total volume of SSOs that reached waters of the state U.S. since last SSMP Internal Program Audit.
- ~~5.10.~~ Percent volume of SSOs recovered since last SSMP Internal Program Audit.
- ~~6.11.~~ Average SSO response time since last SSMP Internal Program Audit.
- ~~7.12.~~ Average SSO duration time (beginning when agency confirms start of SSO) since last SSMP Internal Program Audit.

B. SSO REDUCTION PERFORMANCE GOALS

- ~~1. SSO reduction goals specific in last SSMP Internal Program Audit (% reduction/total number of SSOs). (auto-generated from CIWQS)~~
- ~~2. SSO reduction performance goals projected before enrollee's next SSMP Internal Program Audit (% reduction/number of SSOs).~~
- ~~3. Descriptions of specific changes to be implemented to meet target goal reductions specified in B(2) above:~~
- ~~a. Change(s) to be employed to sanitary sewer system cleaning. (description)~~
 - ~~b. Change(s) to be employed to sanitary sewer system tools and/or technology. (description)~~
 - ~~c. Change(s) to be employed to sanitary sewer system maintenance and repair schedules. (description)~~
 - ~~d. Change(s) to be employed to sanitary sewer system best management practices (BMPs). (description)~~
 - ~~e. Change(s) to be employed to sanitary sewer system staffing levels. (description)~~
 - ~~f. Change(s) to be employed to sanitary sewer system funding levels. (description)~~
 - ~~g. Change(s) to be employed to sanitary sewer system training. (description)~~
- This is an SSMP audit. The SSMP does not require SSO reduction targets. This is just setting agencies up for failure, and/or third party lawsuits.
- ~~4.13.~~ Describe related sanitary sewer system rehabilitation and capital improvement projects, including schedules and costs, planned before your next SSMP Internal Program Audit: (narrative description)
- ~~5.14.~~ Target goals for time between notification of potential SSO and arrival on scene for confirmation that an SSO is occurring or has occurred, and initiation of SSO control if applicable containment, during:
- a. Normal business hours. (minutes)
 - b. After hours/holidays. (minutes)

C. SSMP EFFECTIVENESS

[Subsection D.13(x) of SSS WDRs]

1. Date of last SSMP Internal Program Audit. (date – auto generated)
- ~~2. Person(s) responsible for certifying last SSMP Internal Program Audit and contact information. (enter info or auto-generate)~~
3. Have all SSOs (defined in section A.1 of SSS WDRs) since your last SSMP Internal Program Audit been reported into CIWQS and are the SSO reports accurate?
This information is extraneous busywork and inappropriate for routine audits.
- 4.2. _____ Is the enrollee implementing all elements of its approved SSMP? (yes/no)
- 5.3. _____ If no to C(4) above, provide reason(s) why all SSMP elements are not being implemented. (narrative description)
- ~~6. If SSO reduction goals in B(1) above, were met, describe the factors that contributed to this success. (narrative description)~~
- ~~7. If SSO reduction goals in B(1) above, were not met, describe why. (narrative description)~~
- ~~8. To comply with subsection D.7(iv) of the SSS WDRs, describe all corrective action(s) planned before your next SSMP Internal Program Audit to address the top 10 SSO causes experienced since your last SSMP Internal Program Audit. (narrative description)~~
- ~~9. To comply with subsection D.8 of the SSS WDRs, describe the top three challenges your agency faces and corresponding initiative(s) to be implemented before your next SSMP Internal Program Audit to better operate, maintain, and manage all parts of the sanitary sewer system. (narrative description)~~
10. To comply with subsection D.13(xi) of the SSS WDRs, describe the enrollee's Plan of Communication including challenges and the plan's effectiveness at:
 - ~~a. Communication with the public on development, implementation, and performance of its SSMP. (narrative description)~~
 - ~~b. Communication with sanitary sewer system(s) tributary and/or satellite to the enrollee's sanitary sewer system. (narrative description)~~**It is completely inappropriate to request what the agencies see as their challenges. This is setting them up, or could also be interpreted as asking them to admit guilt, which is not necessary to be in compliance with the SSS WDR and third party lawsuits.**

D. SSMP COMPLIANCE

[Subsection D.13(x) of SSS WDRs]

List compliance status of the enrollee's approved SSMP with all elements in subsection D.13 of the SSS WDRs: (1 - ~~in compliance~~no changes needed, 2 - ~~not in compliance~~changes needed, with written explanation of expected changes, or 3 – N/A with written justification ~~in SSMP~~)

1. Goal/Organization. (select 1, 2 or 3)

2. Legal Authority. (select 1, 2 or 3)
3. Operation and Maintenance Program. (select 1, 2 or 3)
4. Design and Performance Provisions. (select 1, 2 or 3)
5. Overflow Emergency Response Plan. (select 1, 2 or 3)
6. System Evaluation and Capacity Assurance Plan. (select 1, 2 or 3)
7. Monitoring, Measurement, and Program Modifications. (select 1, 2 or 3)
8. SSMP Internal Program Audits. (select 1, 2 or 3)
9. Communication Program. (select 1, 2 or 3)

This section D. is more in line with what an audit is and the associations support this content., as long as each element is reviewed with respect to whether changes are needed, not whether an agency is in compliance. CIWQS should be set up to provide explanations when 2 or 3 is selected here, not have a separate section called "deficiencies" (below) which again is admitting guilt, even if guilt is not the issue, and is in any event a set up, and completely inappropriate.

E. SSMP DEFICIENCIES

[Subsection D.13(x) of SSS WDRs]

List compliance deficiencies identified in section D above, and steps to correct deficiencies over the next 24 calendar months:

~~(1 - Satisfactory, 2 - deficient, or 3) - N/A with written justification in SSMP)~~

- ~~1. Goal/Organization. (select 1, 2 or 3)~~
- ~~2. Legal Authority. (select 1, 2 or 3)~~
- ~~3. Operation and Maintenance Program. (select 1, 2 or 3)~~
- ~~4. Design and Performance Provisions. (select 1, 2 or 3)~~
- ~~5. Overflow Emergency Response Plan. (select 1, 2 or 3)~~
- ~~6. System Evaluation and Capacity Assurance Plan. (select 1, 2 or 3)~~
- ~~7. Monitoring, Measurement, and Program Modifications. (select 1, 2 or 3)~~
- ~~8. SSMP Internal Program Audits. (select 1, 2 or 3)~~
- ~~9.1. _____ Communication Program. (select 1, 2 or 3)~~