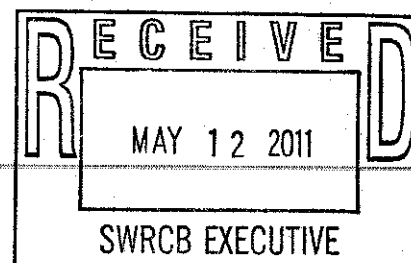


commentletters - Comment Letter - SSS WDRs Review & Update

From: Dave Zevely <dzevely@cayucossd.org>
To: <commentletters@waterboards.ca.gov>
Date: 5/12/2011 1:34 PM
Subject: Comment Letter - SSS WDRs Review & Update



Dear Ms. Townsend:

In my opinion, the requirement for putting a sewer system enrollee under NPDES guidelines for a single category 1 SSO is too stringent. Instead, the following is a more reasonable, realistic threshold: when two category 1 SSOs, not to exceed 2500 gallons combined, occur throughout a single sewer system within a 12-month period, enrollees shall be regulated by NPDES requirements.

Again, in my opinion, In Section D, number 7, the requirements for system operators' training and skill sets are vague, undefined, and unknown. If enrollees are mandated to ensure system operators are "adequately trained and possess adequate knowledge, skills and abilities to perform their duties," the most common operator jobs should be listed alongside minimum training/certification requirements. that way enrollees and their employees will at least have foreknowledge of expected minimum training and certification levels for more typical job titles, such as collection workers 1 and 2, Lead Collection Worker, Maintenance Technicians, O and M Supervisors, et al. these minimum requirements are essential if there is a mandate like the one proposed.

Sincerely,
David Zevely, Waste Water Collections System Maintenance Technician
Cayucos Sanitary District