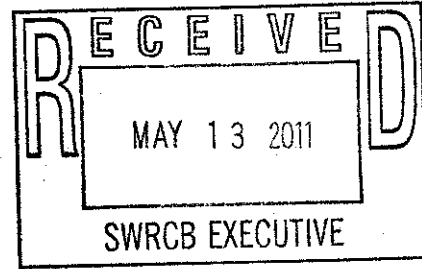


**City of Alhambra**  
*Department of Utilities*



May 12, 2011

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1011 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: Comment Letter – SSS WDRs Review and Update**

Dear Ms. Townsend:

The City of Alhambra would like to take this opportunity to provide comment on the proposed Sanitary Sewer Systems WDR (SSS WDR), which if adopted, would replace the existing statewide SSO WDR (Order WQ 2006-003).

The SSS WDR, as proposed, would place a greater burden on the already strained staffing and budgetary situation the City of Alhambra is facing. Several key concerns include the following:

- A shift from reporting of SSOs and reducing SSOs to a prescriptive and onerous order that seeks to dictate decisions regarding the way local sewer system programs are managed and implemented. Furthermore it is unclear how the additional information that must be generated will be used by the Water Boards, or that the efforts required under the revised permit will produce corresponding environmental or public health benefits.
- The SSS WDR would expand the liability for SSOs by including *all spills to surface water*, instead of only those reaching a "water of the U.S."
- The proposed SSS WDR would change the existing enforcement discretion language of the State Board's intent regarding enforcement priorities and responses to that of a purely advisory provision.
- The SSS WDR is overly focused on private sewer laterals, requiring reporting of private spills by enrollees who have no authority over the privately-owned laterals and requiring detailed information regarding local lateral programs.



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## City of Alhambra

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- The SSS WDR would include a new prohibition on the use of chlorine during spill cleanups, including any potential residual. This is particularly as disinfection of roads, gutter, or storm drains is critical to the health and safety of citizens.
- Although not a part of the staff recommendation, we oppose the alternative to develop a two-tiered approach to regulation of SSS. The utilization of this approach would subject agencies to unnecessary litigation from citizen groups and the very distinct possibility of higher administrative penalties with no evidence that this would improve water quality or reduce SSOs.

The City of Alhambra has made significant strides in implementing a successful maintenance program and spill response program for our system in spite of the limited resources, both in funding and staffing. Through deferment of purchases of other necessary resources, we have been able to obtain a vactor truck for spill response as well as routine maintenance. Under the existing SSO WDR, staff has been able to prepare and implement a more comprehensive tracking program for spills, response activities, policies, and educational efforts, such as the FOG (Fats, Oils, Grease) Program. These combined efforts have resulted in fewer SSOs entering surface waters and/or reduced volumes of SSO material.

We recognize that there are positive aspects to the proposed SSS WDR, and we applaud the efforts of the Board staff to incorporate these items. We encourage the Board to consider allowing the existing programs and progress already begun under the current SSO WDR to be fully implemented in order to evaluate the successes as well as the failures. We thank the Board for your consideration.

Respectfully,

Mary K. Swink  
Deputy City Manager/Director of Utilities

