



DEPARTMENT  
OF UTILITIES

ENGINEERING  
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October 2, 2012

BY EMAIL AND U.S. MAIL

Mr. Russell Norman  
State Water Resources Control Board  
Division of Water Quality  
1011 I Street, 15<sup>th</sup> Floor  
Sacramento CA 95814  
[rnorman@waterboards.ca.gov](mailto:rnorman@waterboards.ca.gov)

Re: Comments on the Proposed Amendments to the Monitoring and Reporting Program for the  
Statewide General Waste Discharge Requirements for Sanitary Sewer Systems

Dear Mr. Norman,

The City of Sacramento respectfully submits the following comments on the amendments proposed to the Monitoring and Reporting Program for the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDRs). We agree with views expressed by other organizations that some of the proposed amendments are too substantive to qualify as mere reporting changes. Our comments, however, focus on the particular proposed changes that pertain to combined sewer systems.

As you are aware, the City owns and operates a combined sewer system per a regulatory regime that differs from the SSS WDRs that are required for separated sewer systems. Combined sewer systems are administered by the U.S. EPA and Regional Water Quality Control Boards through a national CSO Policy and NPDES permits. The current City combined system permit, permit number CA007911, was adopted by the Central Valley Regional Board in January 2010.

During permit negotiations with the Regional Board for the combined system permit, the City recognized the need for public reporting of outflows in the combined system and supported the requirements included in Attachment G of the final permit to utilize the State CIWQS database for reporting of outflows. It was understood during these permit negotiations that the SSS



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WDRs, required for separated systems, do not apply to combined systems and that outflow reporting requirements are more appropriately included in the combined system permit. CIWQS reporting screens were subsequently revised to collect the information required in Attachment G of the City permit.

Unfortunately, the proposed changes in the SSS WDRs MRP include the City combined system reporting information and therefore seems to indicate that owners of combined systems are required by the SSS WDRs to report outflows. We recommend that all references to combined sewer systems be deleted from the SSS WDRs. The following specific changes should be made to the proposed MRP amendments:

**Change #1** – Notification, Reporting, Monitoring, and Record Keeping Requirement A.9.d.i (Page 17/30).

“Select all assets from which the SSO appeared: [*allow multiple selections*]:

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

**Change #2** - Notification, Reporting, Monitoring, and Record Keeping Requirement B.5.c (Page 18/30)

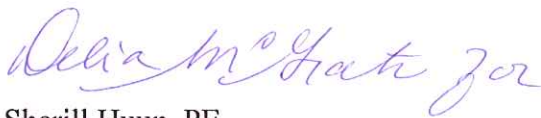
“5. SSO Final Destination (*select all that apply*)

e. ~~Combined Storm Drain (combined sewer only)~~

Confusion could further be avoided if the City were able to report outflows through a CIWQS database specifically developed for the combined sewer system. This manner of reporting would better distinguish between the SSS WDRs reporting requirements for separated sewer systems and that of the combined sewer system permit reporting requirements.

Thank you for your attention to our concerns and your consideration of our proposed changes.

Sincerely,



Sherill Huun, PE  
Supervising Engineer

copy: Bill Busath, Supervising Engineer  
Rob Jack, Wastewater Collection System Superintendant  
Delia McGrath, Senior Engineer