Key Potential Changes to WDR and Potential Impacts to Enrollees

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CASA Collection Work Group
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SWRCB Guiding Policy Statements
For WDR Revisions

• Res 2013-0029 Reducing Costs of Compliance
• Res 2016-0010 Human Rights to Water
• Res 2017-0012 Comprehensive Response to Climate Change
• 2017 Water Quality Enforcement Policy
• Res 2018-0032 Open Data Portal
SWRCB WDR Revision Goals

• Proactive system management
• Effective spill response
• Proactive planning and management
• Transparent reporting
• Feasible and reasonable regulations
• Greater enforceability (RWQCB)
• Common ground before SWRCB draft hearings with stakeholders
SWRCB WDR Stakeholder Activities

• Outreach to the following stakeholders:
  • Environmental Protection Agency
  • Regulated Communities – sanitary sewer systems
  • Professional collection system associations
  • RWQCBs
  • NGOs
  • Private system owners
CASA CWG WDR/MRP Redline Issues

- Minor (de Minimus) overflow violations
- Audit schedules/requirements
- CIWQS reporting issues
- Document retention
- Professional engineer authorization
- SECAP/Capital planning issues
- SSMP Change Log expectations
- SSO Definition clarifications
- SSMP format
- Removal of duplicate requirements
- 2-hour notification requirement – Cat 1
- RWQCB differences
- Elimination of PLSD
- SSO definition
Recent SWRCB Comments/Proposed Changes
CWEA Collections Committee – Morro Bay

- New Category 4 minor SSOs
- Audit timing – 3, 3, 2 – SSMP readoption 8 years
- New term – “non-federal waters”
- Well performing Agency - < 2 SSO/Mile/yr without Cat 4 – SWRCB acknowledgement
- Asset manage/resiliency
- Exfiltration = “leakage” if to be included
- PLSD mandatory reporting
- Clearer enforcement, better definition – better website for external audits
- No private system WDR
- NPDES permit requirement???
How can your Agency get Involved?

- Provide input on the WDR to CASA CWG – Adam, Jared or Paul C.
- Participate in CWG discussions of WDR
- Provide comments on draft language by SSO office next 60 to 90 days
- Provide comments to SWRCB prior to issue of draft WDR/MRP in Fall
- Participate in SWRCB hearings on draft WDR/MRP (30 – 45 days EPA Bldg.)
  - Attend SWRCB hearings and testify – Late Fall
  - Submit written comments to SWRCB – during formal comment period
  - Attend adoption hearing in Sacramento
Thank You

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Potential Key Changes to WDR/MRP

- Minor violation category
- Clarification of audit requirements
- Revised audit schedules
- SSMP format changes – appendices
- Asset management
- Resiliency needs
- Private system enrollment

- Cost of CIWQS Reporting
- Well performing agency by WDID
  - Criteria for designation
  - Period of performance
  - Value as well performing
  - Reduced regulatory reporting???
- Value of data now captured in CIWQS
- Clearer enforcement criteria (RWQCBs)
Impacts to Agencies from Potential WDR Revisions

- Expanded SSMP requirements
- Change Log clarification/guidance
- Audit guidance/clearer schedules
- NPDES permits
- Lateral reporting?
- Well performing agency incentives
- RWQCB enforcement support
- Small/disadvantaged agency issues

- Private system identification
- SSMP Change Log guidance
- Improved CIWQS data quality/comparability/data entry
- Reduced cost of reporting
- Importance of compliance documentation
- No mandatory certification
- Clearer WDR definitions