SSS WDR Update

The State Water Resources Control Board (SWRCB) is seeking to update the 2006 Sanitary Sewer General Waste Discharge Requirements (GWDR) for enrolled agencies. This review has been ongoing for approximately the last years and a half. The update is dealing with both the 2006 WDR and the 2013 Monitoring and Reporting Plan (MRP) requirements. The CASA Workgroup has been leading a statewide group of associations submitting redlined revisions and meeting with the SWRCB several times on issues and changes desired by the enrolled agencies. This Round Table will discuss/seek input on agency concerns and observation on the currently proposed revisions and changes.

**SWRCB Philosophy for Revisions**
- WDR not a permit to discharge
- Discharges vs spills – net volumes, high risk, chronic spills, post event evaluations
- Improved WDR definitions - greater enforceability of nonperforming agencies (RWQCB), change log
- Concern with small/disadvantaged community impacts
- Efficiencies in regulations to maximize value and cost of compliance
- Ongoing spill/volume reductions expected – continuous improvement expected – Cat 1 & 2 especially
- Agency SSMPs must result in reductions of #s and volumes of SSOs
- Climate change impacts and future flow issues/conditions - planning
- Well performing agency recognition
- Goal full stakeholder input and maximized agreements prior to SWRCB hearings
- Revisions to last for ten years +/-.

**CWG Current Perspectives/Concerns**
- No general collection agency comparability – benchmarking very difficult
- Nonfederal waters definition – includes groundwater, leakage
- Minor discharge events, minor SSO category – discussing reporting
- SSMP streamlining and duplicate provisions
- Performance metrics in revision
- No private system WDR – may require enrolled to report active systems to SWRCB
- Asset management, resiliency/risk, leakage, we

**SSMP Reformatting and Additions**
- Removed as Section in WDR
- Several additions – asset management, resiliency/risk, leakage, capital planning
- Audit Requirements – schedules, LRO certification, formal report not checklist
- Performance parameters – no numbers

**Proposed SWRCB Schedule for WDR Adoption**
- Draft Language available to CWG first quarter 2020
- Draft WDR/MRP Revisions available – summer 2020
- SWRCB Hearings – Fall 2020 – *will need industry input – oral/written*
- WDR Adoption – Early 2021