Sanitary Sewer System Waste Discharge Requirements (SSS WDR) Informal Staff Draft

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1998 Capacity Management Operation and Maintenance (CMOM)

2006 - First SSS WDR - Order No. 2006-0003-DWQ
- Rolled out California Integrated Water Quality System (CIWQS)
- Required a Sewer System Management Plan (SSMP)

2013 - Monitoring and Reporting Program - Order No. WQ 2013-0058-EXEC
- Added specific SSO notification and reporting and record keeping requirements
- Plus, requirements to facilitate compliance monitoring and enforcement for violations
1. Goal
2. Organization
3. Legal Authority
4. Operation and Maintenance Program
6. Overflow Emergency Response Plan
7. Fats, Oils, and Grease (FOG) Control Program
8. System Evaluation and Capacity Assurance Plan
9. Monitoring, Measurement, and Program Modifications
10. SSMP Program Audits
11. Communication Program
Annual Number of SSOs by Category

Category 1 Spills
Category 2 Spills
Category 3 Spills
Why a Complete Rewrite and Not a Revision?

- Existing WDR has dramatically reduced spill frequency and volume
- Utilizing existing enforcement tools would further improve effectiveness
- What are the drivers for the significant expansion and rewrite?
INITIAL REACTIONS

- Significant additional burdens, uncertain water quality improvements
- Steep cost of compliance
- Substantially increases risk and liability
- Inequitable for small agencies and DACs
- Does not reflect operational understanding
## By the Numbers

<table>
<thead>
<tr>
<th></th>
<th>2006 SSS WDR</th>
<th>Informal Staff Draft</th>
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<tbody>
<tr>
<td>Pages</td>
<td>20 pages</td>
<td>85 pages</td>
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<tr>
<td>Must</td>
<td>38 times</td>
<td>125 times</td>
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<tr>
<td>Shall</td>
<td>55 times</td>
<td>108 times</td>
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<tr>
<td>Exfiltration</td>
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<td>9 times</td>
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<td>SSMP</td>
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<tr>
<td>Pages of requirements</td>
<td>5 pages</td>
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<tr>
<td>Elements</td>
<td>11 elements</td>
<td>16 elements</td>
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<td>Resiliency element cost</td>
<td>$0</td>
<td>Resiliency element cost $50 - $100 million</td>
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</table>
Number of Enrollees by Size

- Very Small (0-20 miles) - 586 (3.38%)
- Small (21-100 miles) - 330 (19.12%)
- Medium (101-500 miles) - 226 (19.12%)
- Large (> than 500 miles) - 40 (27.92%)

N = 1182

Number of Enrollees by System Size
1,182 total
ISSUES of GREATEST CONCERN

- Exfiltration
- Unreasonable spill reporting timelines (2-hours for ALL spills)
- Increased spill reporting requirements
- Private lateral spill reporting requirements
- 20-year budgets and CAFR requirements
- LRO qualifications – PE or CWEA grade 3
- SSMP organization changes
- Prescriptive system resiliency requirements
ENGAGEMENT

- A Group Effort!!!
- Started several years ago with State Water Board
- Internal and external collaboration intensified after release of Informal Draft Order
- Friday afternoon meetings with State Water Board and Regional Water Board staff
- Meeting with State Water Board attorneys and our attorneys to discuss legal traps
- Numerous Zoom calls to refine Informal Staff redlines
- 60-page Comment Letter
- Redline strikeout word document
NEXT STEPS and Timing

- Convene modest-sized working group of all stakeholders
  - State and Regional Water Boards, Enrollees, NGOs, Etc.
- Make it simpler and less prescriptive
- Conform SSMP Element changes into the 11 current Elements
- Consider cost versus benefits of new features and requirements

- Next SSS WDR draft order: late 2021
- Final SSS WDR to State Water Board: mid to late 2022