

Update of Next Sanitary Sewer System Waste Discharge Requirements



January 10, 2018
California Water Environment Association
Collection Systems Specialty Workshop
Sacramento

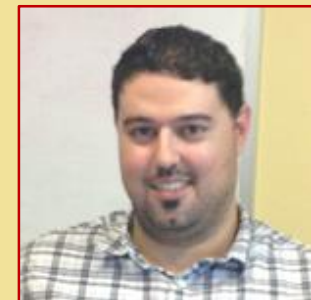
State Water Resources Control Board - Statewide Permitting



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WHAT ARE WASTE DISCHARGE REQUIREMENTS? (SSS WDRs)

1. An Order that does not permit discharges

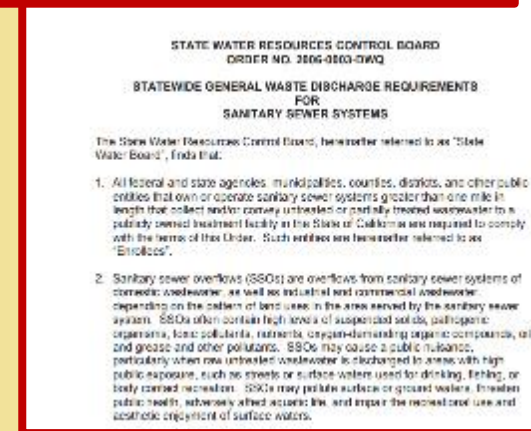
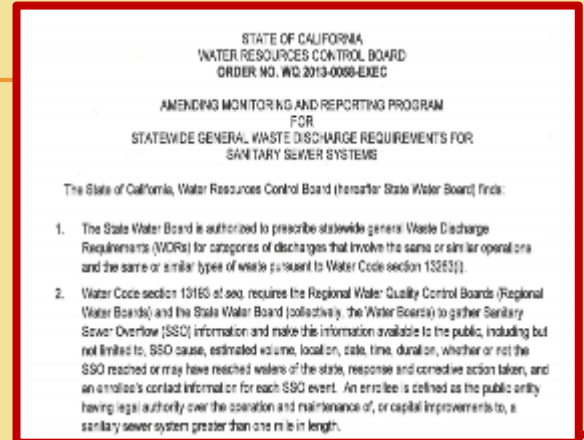
Prohibits discharges:

- To waters of the state (ground and surface waters)
 - California Water Code violation (state)
- To waters of the United States (most surface waters)
 - Clean Water Act violation (federal)

2. Sewer system overflows are acknowledged

The SSS WDRs require:

- System and data management
- Local program management



PURPOSE OF UPDATING WASTE DISCHARGE REQUIREMENTS [PROPOSED]

- **Update requirements for existing and future forecasted conditions.**
 - **Address private system spills that place unfair burden on public agencies and systems**
 - **Address changing sewerage and flow characteristics causing spills**
- **Incorporate efficiencies to maximize value for cost of compliance**
 - **Remove no-longer-necessary requirements**
 - **Provide templates and/or checklists**
 - **Increase clarity of requirements**
- **Implement new federal “analytical methods” requirements**
 - **increased data quality**

STATE WATER BOARD PUBLIC PROCESS FOR ORDER UPDATE

- **Conduct preliminary stakeholder workshops for preliminary communications**
 - **Provide regulatory education**
 - **Receive stakeholder feedback**
 - **Incorporate stakeholder knowledge**
- **Issue Draft Permit for formal public comment period – 30 to 45 days**
- **Continue ongoing communications and transparency**
- **Hold State Water Board Public Hearing and Consideration of Adoption Meeting**
- **Provide education and outreach to implement new Order**

TOPICS FOR DISCUSSION

What parts of the Order work well? What parts do not?

Example questions to begin discussion:

- **How can we improve coordination between the Two-Year Audit and Five-Year SSMP requirements?**
- **How can we clarify Change Log requirements?**

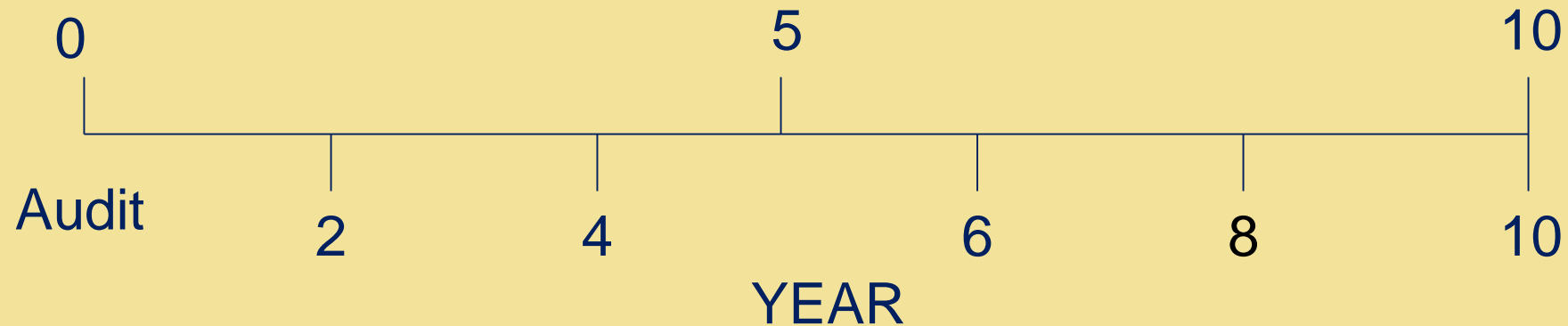
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- **How can spill notifications be streamlined?**
- **Should reporting requirements of small volume overflows be minimized?**
- **What is the minimum size of a private system and/or laterals that should be regulated?**
- **How should climate change be addressed in local program plans?**

ALIGNMENT OF TWO-YEAR AUDIT AND FIVE-YEAR SSMP* RECERTIFICATION REQUIREMENTS

Current Order requirements:

SSMP Recertification*

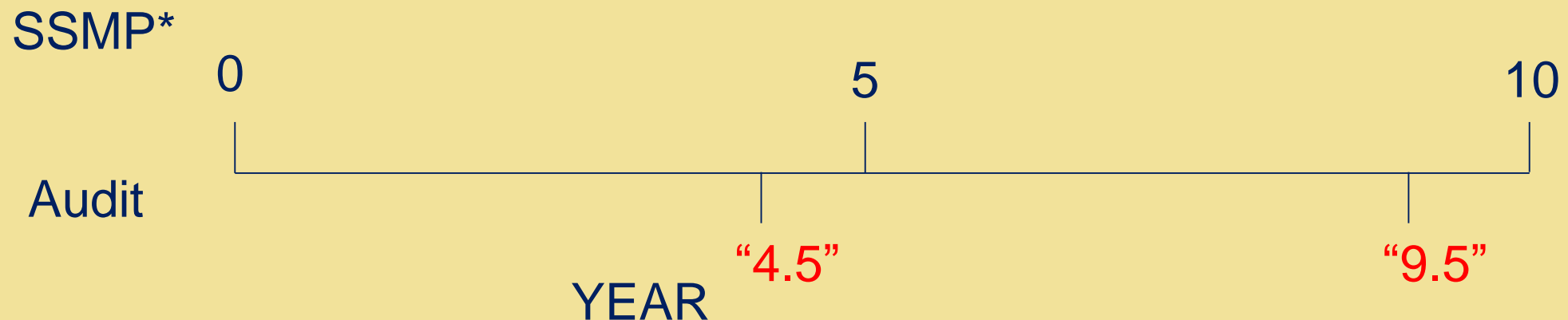


*Sewer System Management Plan

PROPOSAL TO ALIGN TWO-YEAR AUDIT AND FIVE-YEAR SSMP* RECERTIFICATION REQUIREMENTS

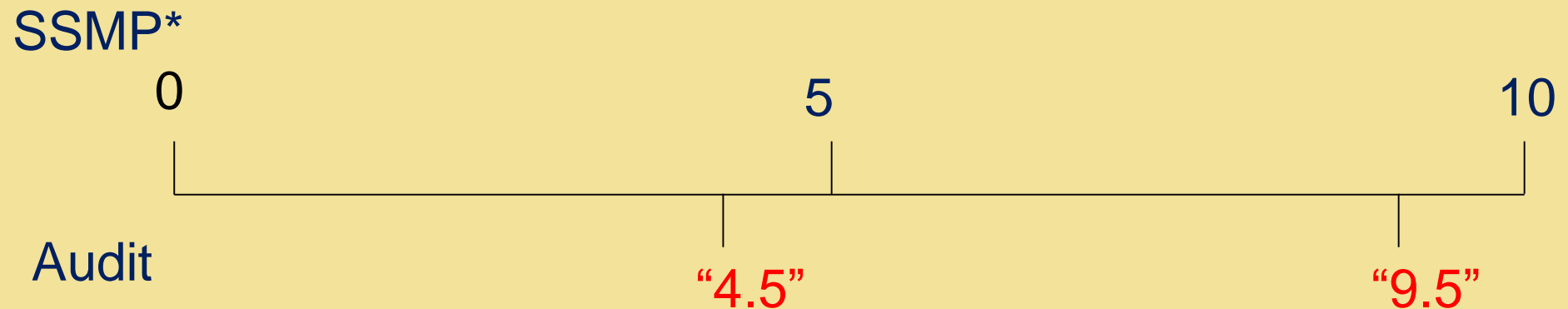
Benefits being sought of a proposed alternative:

- Agency flexibility to schedule audits
- Reduced cost
- Identification of agency-specific SSO trends (frequencies, locations, and volumes).



PROPOSAL TO ALIGN TWO-YEAR AUDIT AND FIVE-YEAR SSMP* RECERTIFICATION REQUIREMENTS

Your Feedback?



*Sewer System Management Plan

PROPOSED CLARIFICATION OF SSMP* CHANGE LOG REQUIREMENTS

- **Current Order needs additional guidelines to the expected content of a SSMP Change Log.**
- **Proposed clarified requirements:**
 - **New log with high-level changes**
 - **Add the new Change Log template to the Order**
 - **Add examples to the existing Discharger User Guide and SSMP Development Guide provided on our website**

PROPOSED CLARIFICATION OF SSMP* CHANGE LOG REQUIREMENTS

Example of proposed clarification:

{Insert Enrollee Name}
Sewer System Management Plan
Change Log

Date	SSMP Element/Section	Description of Change/Revision Made	Change Authorized By:

*Sewer System Management Plan

PROPOSED CLARIFICATION OF SSMP* CHANGE LOG REQUIREMENTS

Your feedback?

{Insert Enrollee Name}
Sewer System Management Plan
Change Log

Date	SSMP Element/Section	Description of Change/Revision Made	Change Authorized By:

*Sewer System Management Plan

FURTHER DISCUSSION

How can spill notifications be streamlined while continuing to provide vital information?

Your Feedback?

FURTHER DISCUSSION

If private systems are regulated, what is the minimum size system that should be included in the Order?

- **Should private laterals also be included? Explain.**

Your Feedback?

FURTHER DISCUSSION

Are agencies modifying local programs to address impacts from climate change and user habits?

- Drought and water conservation
- Higher intensity rain events
- Longer periods of higher temperatures
- Ground subsidence
- Sea level rise (up to 7 feet in 30 years)

Your Feedback?

TIME FOR FURTHER DISCUSSION?

STAY INFORMED AND INVOLVED DURING DEVELOPMENT OF FUTURE BOARD ACTIONS

Why?

*To incorporate your knowledge into the next “X” years
of sewer system regulations*

Subscribe to our Lyris email messaging system for website updates
“Sanitary Sewer Overflow Reduction Program Order Review”

at

https://www.waterboards.ca.gov/resources/email_subscriptions/swrcb_subscribe.html

** * * Thank you * * **