

Committee Request for Board Action: None**26 attendees, representing 18 member agencies.****Presentation on Santa Rosa fire recovery**

Joe Schiavone, Deputy Director of Santa Rosa Water and Sewer Operations provided a [presentation](#) on the 2017 fires and the City's response, including:

- Statistics
- Timelines
- Specific impacts to the community
- How the fire impacted the distribution/collection systems
- Water infrastructure damage

Lessons Learned

- The importance of planning
- Knowing the plan must change/adapt
- Fatigue and impact on staff
- Communication – internal and interagency
- Operating without SCADA

FEMA

- Recognizing the massive federal bureaucracy
- Understanding some agencies ask for more
- Fire caused contamination is not normal
- Educating FEMA with the help of regulators
- The value of an accurate DDD
- Documentation – Forms, Contracts, Language Requirements
- What will they pay for
- The reimbursement process

SSS WDR Update (Paul Causey)

General: Audience of 30 people in the room and several more who attended the video conference session by phone. In attendance was one representative from the California Coastkeeper Alliance.

Diana Messina and Armando Martinez began by presenting background on the WDR revisions processes and procedures and statistical data from the CIWQS sanitary sewer overflow data. Diana indicated that the next revisions of the WDR should be expected to be operation for at least ten years from the adoption by the SWRCB and that the primary focus of the revisions to the WDR would be reduction of spill volumes going forward, as Category 1 overflows are continuing to be large volumes, and enforcement on poorly performing agencies under the WDR. They indicated that the presentations from the meeting would be available to anyone interested following the meeting. Diana also identified five areas they were hoping to receive input on during the stakeholder meeting as follows:

1. Costs to comply with the order.
2. Regulation of large private sewer systems - greater than one mile possibly
3. Improvement of data quality - in CIWQS
4. SSMP Requirement upgrades and enhanced enforcement
5. Potential regulatory incentives for well performing systems

They indicated that the WDR revisions would be guided by several SWRCB guiding policy statements as follows:

- Resolution 2013-0029 Reducing Cost of Compliance
- Resolution 2016-0010 Human Rights to Water
- Resolution 2017-0012 Comprehensive Response to Climate Change
- 2017 Water Quality Enforcement Policy
- Resolution 2018-0032 Open Data Portal

They indicated their intention to restart the Data Review Group as they recognize there are many issues with the integrity of the CIWQS data that needs to be evaluated and updated. In addition, they feel that there needs to be better clarity on the reporting into CIWQS - better drop downs and more detailed lists of choices for specific questions for all categories of overflow. In addition, we discussed the possibility of creating better comparability between agencies such as agencies with and without laterals, small versus large, etc.

As to the process, they expect to have a draft in late fall (Armando Martinez will be the permit writer, followed by SWRCB hearings, followed by possible adoption in 2020. Diana stressed that once a draft is submitted that the only changes that can be made must come from public or written comments received during the comment period. This means they cannot add anything new to the permit WDR that is not originally identified in the draft. The public comment period will be from 30 to 45 days following release of the draft WDR. Finally they are not expecting to change any current laws or institute any legislative action which would impact sanitary sewer systems. All changes and modifications will be based on existing water code.

Some of the highlights from the question and answer period from the attendees and those on the webinar for the second half of the stakeholder workshop as follows:

- How much does it cost agencies to report minor spills? (Note: We would love some real cost data to evaluate and respond to this.)
- **Private System Questions:** SWRCB staff would like help in identifying private systems. The WDR for private systems would be a separate order and would not be included in the public system WDR. There were some questions about how to handle prison systems and federal systems as private. There were comments about not impacting or expecting oversight of private systems by current agency enrollees.
- **CIWQS Questions:** How is the current data in CIWQS useful? Who uses it how? What data is of no use and could be eliminated? Could lower lateral information be more apparent and easier to compare agencies with similar responsibilities? What additional drop down fields would be helpful in CIWQS? Should current drop downs be evaluated?
- **Spill Volumes:** Suggestion that the ratio of current spills to current volumes transmitted should be evaluated. Total volume spilled divided by number of spills
- Minor spill reporting - might be attached for well performing facilities - they are seriously considering this possibility
- **Audits:** There was a discussion of audit timing and requirements 2, 3, or less discussed no consistent recommendation other than do not eliminate these - suggestion made to tie to fiscal year for audit. Statement made that audits are important and some agencies would still do even if time schedule extended or reduced. Suggestion of 10 year term for SSMP revisions and just audits at regular intervals.
- Possible requirement for volume estimation method as mandatory field for completion in CIWQS
- WDR will not require mandatory staff certification - they do see a tie into to reduce SSOs and volumes with certified employees- might be one criteria for a well performing agency
- **Resiliency and Asset Management:** Resiliency and asset management will be important additions to the WDR - how to require implementation discussed and what do these terms mean and imply. Want all agencies to implement resiliency evaluations and asset management at some level - want to see governing board directives around these concepts at least
- Well performing agencies discussion
 - Concern with possible backsliding by agencies if implemented
 - How long must an agency comply to be eligible
 - What criteria will apply for different types of agencies - laterals, pump stations, etc? How do they impact performance evaluation
 - Should not be just year to year but over extended time periods
 - Should be classed on continuous improvement of what? Volumes spilled, volumes recovered, volumes not to surface waters?
 - Leading and lagging indicators - trend lines overtime time - five years, ten years or what time frame?
 - What is the end goal here? What is a poor system in comparison?
 - Purpose to bring all enrolled agencies to proper level of performance thru continuous improvement
 - Goals to encourage agency compliance not enforcement - poor performing agencies to see worthwhile to improve
 - How would drought or intense rain impact well performance history
- No discussion of private lateral reporting beyond current voluntary

Finally, they stated that there would be no notes or minutes from the stakeholder workshops but they are keeping extensive notes and all questions and comments from the attendees. They also asked anyone interested in the future of this regulation to sign-up through LYRIS to assure prompt notification of future actions and information from the SWRCB process.

Collection System Reporting during NPDES Permit Reissuance

FSSD provided language that the Regional Water Board included in their NPDES permit reissuance letter, requesting that they provide information in their report of waste discharge that is available in their SSMP. The committee agreed it is a concern that SSS WDR issues continue to creep into NPDES permits. This issue will be raised at the next meeting with Regional Water Board Staff on May 20.

Next Collection System Committee Meeting

The committee will be transitioning to a quarterly schedule. Our next committee meeting will be held on July 25, 2019.