

**Committee Request for Board Action: None**

**61 attendees, including representatives from at least 32 member agencies**

**[EBMUD Wet Weather Consent Decree Implementation Update](#)**

Chris Dinsmore (EBMUD) explained how the District uses hydrologic and hydraulic modeling to evaluate its progress in complying with a Consent Decree to reduce I&I. Modeling allows an “apples to apples” comparison that is not possible with real storms, which vary dramatically in frequency and size. The model output allows the District to track performance over time for key metrics such as reductions in the amount of system-wide volume discharged compared to a baseline, or reductions in flows to the wet weather treatment facilities. So far, this approach is demonstrating that collection system rehabilitation has been effective in reducing modeled discharge volumes by roughly 20% compared to the FY11 baseline. During Q&A, it was noted that smoke testing with CCTV has been one of the most effective ways of identifying defects. Requiring private HOAs to complete replacement work has also been effective.

**SSS WDR Update**

The committee discussed the [public draft Sanitary Sewer Order](#) (SSS-WDR) released by the State Water Board on January 31 for a 60-day public comment period. BACWA is preparing a markup of the document, which will be distributed soon. Many of the requests that BACWA made on the February 2021 informal staff draft were granted. However, the public draft still requires a close review, so members should plan to informally provide their comments by March 1.

BACWA’s Regulatory Program Manager shared a list of the top 5 draft comments so far (see [slide deck](#)). The ensuing member discussion touched on the following points:

- Grade 2 operator certification is not the right level to certify SSMPs
- Procuring and maintaining the surface water monitoring equipment required for DO, turbidity, etc., will be challenging. Collection system operators are not trained to do this sampling or to calibrate the equipment.
- Since the stated purpose of the new SSS-WDR is to improve enforceability, the State Water Board should consider issuing compliance and enforcement guidance.
- The draft requires agencies to estimate travel time and volume to receiving waters.
- Use of the phrases “surface waters of the state” and “waters of the US” requires review.

State Water Board staff will be hosting information sessions on February 23 and 24 ([Register here](#)) and the State Water Board will have a formal workshop to hear public comment on March 15<sup>th</sup>. Comments are due on Friday, April 8<sup>th</sup>.

**Poll on Future Meeting Topics**

Based on a poll during the meeting, members identified the top 3 future meeting topics as (1) Updating your SSMP under the new SSS-WDR; (2) Compliance and enforcement considerations for new SSS-WDR; (3) Identifying and managing exfiltration BMPs.

**Next Collection System Committee Meeting**

Thursday, May 12, 2022

**BACWA Annual Meeting**

Friday, May 6, 2022  
at the David Brower Center in Berkeley