

**SSO-WDR Order Changes Audience Questions:
April 25, 2011**

why is NOI and NON being required

Some currently enrolled systems will not be required to seek coverage under the new WDRs so; an NON will be required so we can un-enroll the system under the old WDRs and so we have a record of why the system is no longer covered to respond to public records requests, etc.. Likewise, new systems not currently enrolled will be required to seek coverage under the new WDRs so; an NOI will be required to enroll them. For currently enrolled systems that will be covered under the new WDRs, an NOI is being requested to ensure we have the most current LRO signature on file and to provide a record of enrollment under the new Order.

Does the agency contact the manager of private sanitary sewer systems about enrolling into the system or does the state? State Water Board staff will handle all aspects of enrolling private sanitary sewer systems under the new WDRs. There is no requirement that receiving sanitary sewer systems identify satellite systems connected to them. However, any outreach to satellite systems the public agencies can do in this regard will be appreciated

Is the agency responsible for clean-up of SSOs in private laterals?

First, the spill is an SSO if it is caused by a problem in the SSS WDR enrollee owned pipe regardless of where it appears. The spill is a PLSD if it is caused by a problem in the private owner's pipe regardless of where it appears. The private owner is responsible for all aspects of PLSD cleanup and repair and, it is proposed that the SSS WDRs enrollee is only responsible to report the PLSD if they become aware of the spill.

If we use potable water to wash down to a storm drain and we test for a residual before we release....is this acceptable?

Yes, as long as the chlorine residual meets receiving water limits and/or does not result in a water quality standard, as specified in the applicable Basin Plan, for chlorine being exceeded.

Can you define PLSD spill and what it includes?

PLSD is an abbreviation for "Private Lateral Sewage Discharge". A PLSD is a sewage spill that is caused by a failure or problem in a privately owned sewer lateral. A spill is an Sanitary Sewer Overflow (SSO) if it is caused by a problem in the SSS WDR enrollee owned pipe regardless of where it appears. The spill is a PLSD if it is caused by a problem in the private owner's pipe regardless of where it appears. The private owner is responsible for all aspects of PLSD cleanup and repair.

What kind of contractors need to be identified? Does this include any contractors hired for a one-time activity? Or does this include any on-call contractors.

Contractors that do routine work implementing any aspect of the SSMP should be identified. This should include on-call contractors if they are relied upon to implement an aspect of the SSMP (e.g., spill cleanup).

Is the agency responsible for private lateral inspection? Or does the agency need to make sure that the private lateral is inspected by the private owner/party?

The agency is not responsible for inspection of private laterals under the Sanitary Sewer Systems WDRs. Any activities related to private lateral management that the enrollee undertakes should be specified in their SSMP. Please review the attached Health and Safety and PUC code references for specific powers agencies are expected to exercise in dealing with private lateral issues.

Regarding the mapping requirement, will you accept digital?

Yes

When cleaning up a spill with potable water, ie water that meets all state and federal drinking water standards, why must the water be de-chlorinated with such small residuals? If it is fit for human consumption why would it need to be dechlorinated? Any residual would be consumed when it entered any stormdrain channel. Common average potable residuals are 0.5 mg/l -

Mark Wiley -City of Upland

Chlorine and it's by-products are toxics that are regulated in California. No exemption is provided for spill cleanup in the state *Policy for Implementation of Toxics Standards for Inland Surface Waters Enclosed Bays, and Estuaries of California* (State Water Resources Control Board, 2005). Application of this Policy is also why treated wastewater effluent is required to be de-chlorinated prior to discharge to surface waters.

What is the preferred method for reporting estimated start time of a spill? Casey Wilchert - City of Brentwood

Some effort should be made, and documented, to estimate the actual spill start time as closely as possible. This can be in the form of asking by-standers or neighbors, etc. What we have seen is agencies setting all spill start times equal to the agency notification times and this is not acceptable. Some documentation should be in the record that indicates what information was obtained to establish the spill start time. There is no preferred or required method for this however, setting the start time equal to the notification time will not be acceptable unless it is documented that more accurate information was available and what steps were taken to get that information.

you briefed on inspections can you explain in more detail?

I have attached a PowerPoint presentation by our Office of Enforcement staff with information regarding sanitary sewer system inspections.

Where can I get help with the process of auditing our SSMP? Adin Selby - City of Galt

The industry trade organizations in your area will likely have information on this and, possibly, examples of audits performed by other agencies. A search of Google turns up some results for SSMP internal audits that have been performed and posted online by several agencies. Finally, the draft optional Sanitary Sewer System Survey/Questionnaire (see attached) is a good guide in terms of items to consider when conducting an internal audit.

will ndpes permits be required for spills under natural disasters

No. State Water Board staff is proposing that the SSO Reduction Program remain as WDRs and not an NPDES permit. The WDRs do require all SSOs be reported regardless of spill cause.

We have 54 miles of sewer pipes that we monitor. But we oversee a private 14000 gpd plant are we required to submit on there behalf on reporting sso's?

The "owner" is required to enroll and participate in terms of the WDR reporting requirements. We do not care who operates the system in terms of WDR compliance; the owner is responsible for ensuring WDR compliance. The answer to your question will depend on your arrangements with the sanitary sewer system in question.

this is a private system

[See above.](#)

4 miles of private sewer system

[See above.](#)