

**Sanitary Sewer Waste Discharge Regulations  
SWRCB Potential Areas for Consideration of the WDR  
CWEA Collection System Workshop, Sacramento, CA  
January 10, 2018**

The representatives from the SWRCB discussed their desires for a collaborative conversation of changes that maybe considered in possible revisions to the 2006 WDR and 2013 MRP. The very much are seeking input from the profession before drafting any potential changes or revisions. They have been meeting across the state with stakeholders at seven (7) workshops conducted by the CWEA in the past year. The following are the point of discussion raised by the State at the Sacramento Workshop attended by approximately 130 collection system professionals. The 130 included agency personnel, representatives from the SWRCB and RWQCB Regions 2 and 5R – estimated at 15 to 20 persons and a few consultants. The workshop presentations from yesterday and the previous CWEA workshops are available at <http://library.cwea.org/2017-collection-system-workshops/>

The SWRCB stated goals for the WDR update from their presentation yesterday are as follows:

1. Update requirements for present and future conditions
  - a) Private systems
  - b) Address changing sewerage and flow characteristics causing spills
2. Incorporate efficiencies to maximize value for cost of compliance
  - a) Remove no longer requirements
  - b) Provide templates and checklists
  - c) Increase clarity of requirements
3. Implement new federal “analytical methods” requirements
  - a) Increase data quality
4. Improve quality of CIWQS Data
5. Remove no-longer-necessary requirements
6. Add regulations for larger private collection systems
7. Address climate change impacts.

With the above goals here are the items raised at the workshop by the attendees:

1. Better alignment of the two-year audit and the five-year SSMP recertification requirements – one audit six months before SSMP reauthorization?
2. SSMP Change Log – clarification regarding retention and level of detail – use as evidence of proper and compliant SSMP implementation – additional guidance
3. How can spill notifications be streamlined?
4. Should reporting requirements of small volume overflows be minimized?

5. How should climate change be addressed in local program plans? Planning requirements for present and future climate change impacts – see SWRCB Policy on Climate Change
6. What is the minimum size of private systems and/or laterals that should be regulated?
7. Elimination of requirements that no longer produce value
8. More efficiencies through templates and checklists available as tools for agencies
9. “Make regulations make sense” – SWRCB comment

Other issues raised by the workshop participants:

- A. De Minimus volume reporting
- B. Compliance requirements based upon performance results – audits and readoption
- C. Concerns that one audit in 5 years is not enough – more pressure on change logs
- D. Spill notification streamlining – longer period – this maybe driven by the Health & Safety Code requirements in law.
- E. Addition of funding requirements to force agency governing boards to approve increases or provide collection system support - Friendly enforcement orders
- F. Mandatory operator certification
- G. Use of technology for reporting – especially OES notifications
- H. Communications between operations and engineering – lots of discussion on this issue – possible sign-off requirements for capital by operations
- I. CASA Letter with issues stated
- J. Use of standardized reporting forms across all agencies
- K. Impacts of wipes on system operations
- L. Emphasis on best asset management practices
- M. Recognition of efficiencies especially that reduce or eliminate rate increases
- N. CIWQS data training and education on use of CIWQS data
- O. Acceptance programs for new asset additions

- P. “Hot spot” programs
- Q. CIP evaluations especially in high risk areas
- R. DE chlorination of SSO wash water before use in the field
- S. Developed and implemented WQMPs