Proposed Revisions

Sanitary Sewer Systems Waste Discharge Requirements (Order)

State Water Board

Division of Water Quality

Office of Enforcement

Regional Water Boards

Permitting Unit

NPDES RT Meeting
January 2019

NPDES Permitting Chief: Afrooz Farsimadan
Staff Contact: Armando Martinez

Discussed at Last Roundtable

- **Proposed SSS WDR Changes/Additions**
  - Regulate **Private Collection Systems**.
  - Create new spill category (Cat4) for **<50 gallon spills**. Not de minimis.
  - **Separate SSMP** into Operations & Maintenance and Capital Improvement Projects. Include climate change requirements.
  - **Standardize reporting** due dates using tables. Includes SSMP, Questionnaire and audits.
  - Increase **SSMP recertification to six years** to line up with two-year audits.
  - **Reorganize Order** and use the NPDES permit template.
  - Create **Performance & Compliance Class "A"** for agencies that have submitted all reporting requirements, have a low (need number) spill per mile, low vol per mile, and >75% certified operators. These will have reduced audits, one in six years, minimal reporting for Cat 4, and low probability of inspections.
  - Create **Performance & Compliance Class "B"** will be everyone else and will require audits every two years (3 in a six-year period with SSMP recertification). Same as before.

Since Last Roundtable

- We met with Executive Management to discuss reissuance approach.
  - Executive Management has asked us to look into re-issuance as an NPDES Permit and brief our board members and get their input
    - We have met internally to discuss differences
    - We have reached out to Council to get their input
    - We have put together notes to brief our board in early February
      - We will brief board members about changes and potentially drafting Order as an NPDES Permit
- We had second meeting with California Association of Sanitation Agencies (CASA) to discuss redlines.
- We and RB staff have been coordinating in scheduling public workshops at the CalEPA building and in RBs 5R, 5F, and 9.
- We have worked with the RBs to form the Sanitary Sewer Systems (SSS) WDR Reissuance Subcommittee
- We met with the Office of Public Participation (OPP) to discuss the public outreach approach for the workshops.
- We have prepared briefing notes and hope to brief our board members in early February.

Moving Forward

- **Brief our board members – February 2019**
  - We will present the differences between an NPDES permit and WDR Order.
  - The board will give us direction as to how they want the Order drafted.
- **Draft Order per board member direction – February 2019 – May 2019**
- **Work with the RBs to reschedule the public workshops – January 2019**
  - We are aiming for May
  - We will work with RB staff to ensure RB staff availability
- **Hold the public workshops – May 2019**
- **Modify the draft to incorporate outreach information and RB recommendations – May 2019 – June 2019**
- **Send draft for review – tentatively June 2019-July 2019**
  - DWQ Management
  - RBs and EPA
  - Office of Chief Counsel
- **Brief our board members – tentatively August 2019**
- **Send draft for review – tentatively early fall 2019**
  - **Assistant deputy director**
  - Deputy director
- **Post public notice – tentatively October 2019**