



Consolidated Ordinance and Enforcement Response Plan Highlights

As part of its ongoing business practices, SRCSD periodically reviews and amends as necessary the Consolidated Ordinance and ERP. The goal of this review process is to improve clarity and readability, to eliminate redundancies, and to ensure that the documents remain current with new regulatory requirements.

Over the last several months, SRCSD has identified a number of necessary amendments to its Consolidated Ordinance and ERP. These changes have not significantly altered administration of the ordinance from past practice and the overall impact is generally small. In fact, many of the amendments will provide positive relief to some SRCSD industrial customers by streamlining federal pre-treatment requirements and reducing program oversight. **NOTE: None of the proposed amendments will change SRCSD's current published monthly rates or sewer impact fees.**

Changes to the ordinance are limited to Chapter 1 which is the Definitions and Construction section, Chapter 2 which is the Sewer Use section and Chapter 4 the Sewer Impact Fees section. Changes to Chapters 1 and 2 predominately apply to users who have industrial-like or non-domestic discharges and may require a wastewater discharge permit. Changes to Chapter 4 are of more general interest and could apply to any user type. These changes are administrative and clarifying in nature. Changes to the ERP are clarifying and non-substantive.

Below you will find a description of some of the more significant changes being proposed with the full text of the proposed changes available in redline at <http://www.srcsd.com/ordinances.php>. It is noted that in general, these changes should result in an overall savings in resources both to the regulated community and SRCSD.

If you would like to talk about the proposed changes to the ERP or SRCSD's Consolidated Ordinance, Chapters 1 and 2, please contact Glen Del Sarto, Wastewater Source Control Section Manager, at (916) 875-6554.

If you would like to talk about the proposed changes to SRCSD's Consolidated Ordinance, Chapter 4, please contact Jan Holm, Customer Care Manager at (916) 876-6149.

Comments/questions should be submitted prior to October 31, 2011 to allow staff time to address or incorporate them prior to introducing the proposed changes to the District Board of Directors, tentatively scheduled for mid December, 2011.

CHANGES OF INTEREST SRCSD Consolidated Ordinance

Chapter 1 - Section 1.3 Definitions and Construction

BEST MANAGEMENT PRACTICES

- Introduced the term and concept of Best Management Practices (BMPs). BMPs can be required by SRCSD in lieu of numerical discharge limits and are enforceable. BMPs would most likely be applied to groups of businesses required to meet certain discharge standards, where performing wastewater sampling at the discharge point becomes impractical or cost prohibitive. As an alternative to discharge limits, users can implement BMPs to demonstrate compliance.



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NON-SIGNIFICANT CATEGORICAL USER

This term is defined to allow for a reduced level of administrative oversight for qualifying users. This allows SRCSD to administer a “tiered” permit approach for categorical users.

SIGNIFICANT INDUSTRIAL USER

- This change in definition gives SRCSD more discretion over who is classified as a Significant Industrial User. Currently, any user discharging over 25,000 gallons per day is required to be classified as a Significant Industrial User and subject to the requirements for inspection, sampling and documentation under the Federal pretreatment program. Modification of the definition will allow SRCSD to classify as “significant” under the Federal program, only those users with sufficient flow or pollutant loading to warrant a concern. The result is that fewer users will be subject to regulation under the Federal program.

Chapter 2 – Sewer Use

Section 2.6.2

- The proposed changes significantly reduce the number of users that will have to complete a Sewer Use Questionnaire. This questionnaire was previously requested of all business types, including retail stores discharging only domestic wastewater. As amended, the questionnaire would only be requested of those users whose discharge is nondomestic with a volume or characteristic that warrants additional evaluation.

Chapter 4 – Sewer Impact Fees

Section 4.02.03E

- Clarifies an ongoing requirement that all commercial users that have a change in use, as evidenced by changes in physical characteristics (e.g. change in business size, change in business description) as well as changes in flow are subject to periodic review and incremental sewer impact fees as warranted.

Section 4.03.09

- Clarifies an ongoing requirement that liens may be transferred to the property tax roll. The result is that the District’s business practices will remain the same, but the ongoing practices will be more clearly documented in the ordinance.

Enforcement Response Plan (ERP)

The primary change to the ERP is the introduction of the term and concept of Best Management Practices BMPs (found in Section 1 - Definitions and Abbreviations; Section 3- Enforcement Response and Procedures; and Section 4 -Enforcement Response Guide, D.) These revisions to the ERP ensure consistency with the changes proposed in the Consolidated Ordinance, which introduced BMPs as enforceable requirements when used in lieu of numerical discharge limits.