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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

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IN REPLY PLEASE
REFER TO FILE W-9

Mr. Dean Allison
Director of Public Works
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275

RECEIVED
City of Rancho Palos Verdes

APR 01 2001

PUBLIC WORKS DEPARTMENT

Dear Mr. Allison:

PROPOSED ENVIRONMENTAL PROTECTION AGENCY REGULATIONS ON SANITARY SEWER OVERFLOWS

This letter is to inform you of new regulations developed by the United States Environmental Protection Agency (EPA) to ensure that sewer collection system owners and operators take a pro-active approach to minimize sanitary sewer overflows. These regulations are currently under review by the EPA Administrator. If they are approved, they will be published in the Federal Register, followed by a 120-day public comment period. Adoption could then occur within the next one to two years.

The new regulations would prohibit sewer overflows of any size, except overflows caused by natural disasters. Owners and operators of sewer collection systems, such as your City and the Consolidated Sewer Maintenance District (District), would be required to 1) apply for a National Pollution Discharge Elimination System (NPDES) permit; 2) evaluate the physical condition of all sewer facilities; 3) identify and develop corrective action plans to address deficiencies in the carrying capacities of the sewers; 4) implement new programs for monitoring and reporting sewer overflows; and 5) develop a Capacity, Management, Operation and Maintenance (CMOM) Program. The CMOM would summarize the owners/operators legal authorities and identify specific steps to accomplish the goals of the new regulations.

The State Water Resources Control Board (SWRCB), acting through the local Regional Water Quality Control Board (RWQCB), is examining options for implementing the regulations for local sewer systems, such as that owned by your City. As currently drafted, the federal regulations allow the SWRCB to determine if local sewer systems will be regulated under a general or individual NPDES permit. The City, as the owner of the local sewer system, and the District, as the operator, may be named co-permittee's on the NPDES permit.

As the owner of the local sewer system, your City will be responsible for many aspects of the CMOM, including: funding, issues related to design and installation; infiltration/inflow; controlling industrial waste discharges through enforcement of local sewer ordinances; current capacity and structural assessment; identification and prioritization of structural and hydraulic deficiencies; system evaluation; capacity assurance; and capacity enhancement measures.

The broad scope of the required system engineering analysis and capacity assurance is beyond the resources and funding available to the District for general ongoing system operation and maintenance. We will coordinate with your City staff and/or consultants wherever possible to facilitate our joint compliance efforts. As operators, the District will be responsible for the required sewer overflow monitoring and reporting programs and development of the CMOM program for the District. We will also continue to provide our sewer maintenance services, including regular inspections of sewer manholes, pump stations and other facilities, and emergency repairs.

We have enclosed a copy of the draft regulations for your use. After finalization of the rule, its implementation will be phased in over various time periods as specified in the requirements. You may find more information about the new regulations on the Web at www.epa.gov/owm/sso.htm.

If you need further information, please contact Mr. Nicholas Agbobu at (626) 300-3382.

Very truly yours,

JAMES A. NOYES
Director of Public Works



T. M. ALEXANDER
Deputy Director

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