

California State Water Resources Control Board

Annual Fees for Proposed Statewide General Waste Discharge Requirements Covering Publicly Owned Sanitary Sewer System Agencies

The State Water Resources Control Board (State Water Board) is considering proposed Waste Discharge Requirements (WDRs) for publicly owned collection system agencies on May 3, 2006. Water Code Section 13260 requires all persons regulated by waste discharge requirements to pay an annual fee established by the State Water Board. To comply with this requirement, the State Water Board is intending to assess fees on wastewater collection system agencies in accordance with the State Water Board's current fee regulations.

The State Water Board's current fee structure for WDRs is based upon both the threat and complexity of the proposed discharge. Threat is determined by both the type and longevity of impairment caused by the waste-stream and denoted by either:

- Category 1 – long-term loss of designated beneficial use;
- Category 2 – could impair the designated beneficial uses of the receiving water, cause short-term violations of water quality objectives, cause secondary drinking water standards to be violated, or cause a nuisance; or
- Category 3 - degrade water quality without violating water quality objectives, or could cause a minor impairment of designated beneficial uses as compared with Category 1 and Category 2.

Complexity is determined by the type of waste-stream and methods used for treatment. Complexity is denoted by either:

- Category A – Any discharge of toxic wastes, any small volume discharge containing toxic waste or having numerous discharge points or ground water monitoring, or any Class 1 waste management unit;
- Category B – Any discharger not included above that has physical, chemical, or biological treatment systems (except for septic systems with subsurface disposal), or any Class 2 or Class 3 waste management units; or
- Category C – Any discharge for which waste discharge requirements have been prescribed pursuant to Section 13263 of the Water Code not included as a Category "A" or Category "B" as described above. Included would be discharges having no waste treatment systems or that must comply with best management practices, discharges having passive treatment and disposal systems, or dischargers having waste storage systems with land disposal.

Under this billing schema, sewer collection systems are most appropriately categorized with a complexity of "C" because SSOs are not subject to waste treatment systems, and because the regulation of these systems mainly require best management practices.

The threat that SSOs pose to beneficial uses of water, however, is not consistent for every sanitary sewer system. Threat can be related to the population served by the sanitary sewer system. Larger populations typically convey greater amounts of wastewater and SSOs in larger communities typically are larger in volume. Larger volume spills usually result in longer-term losses of designated beneficial uses, while smaller spills are typically associated with minor impairments of designated beneficial uses. Given these characteristics, the following table classifies threat to water quality based on population served by the sewer collection system. The table also includes the fee associated with this classification, which is subject to the fee regulations adopted by the State Water Board every fiscal year.

Population Served*	Threat and Complexity Designation	Current Fee Schedule (\$/year)
< 49,999	3C	\$800
≥ 50,000	2C	\$4290

*Assume 2.5 people per equivalent dwelling unit (EDU)

The State Water Board has identified approximately 1,250 public agencies that either own and/or operate sanitary sewer systems within California. These fees are expected to support program expenditures.