



January 3, 2019

Janet McCue
San Diego County Air Pollution Control District
10124 Old Grove Rd.
San Diego, California 92131

Subject: Rule 11 Amendments

Dear Ms. McCue:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates the opportunity to comment on the proposed revisions to Rule 11 with regards to exemptions for municipal wastewater pumping facilities.

SCAP represents 83 public water/wastewater agencies in southern California. SCAP members provide essential water supply and wastewater treatment for approximately 20 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's wastewater members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastewater into resources for beneficial uses such as recycled water and renewable energy.

SCAP is in support of the change to the Rule 11 exemption language on page 23-24 that reads as follows "Municipal wastewater pump stations with an annual average actual throughput of less than one million gallons of wastewater per day". We understand that the average will be based on average annual throughput. On page 24 the rule also reads "Records of daily throughput shall be maintained on-site for three years and be made available to the District upon request". We suggest this sentence be revised to include "*or readily available*" as some pump stations are small and only marginally weather proof. Additionally, we wish to advise that some smaller pump stations do not have meters and the throughput would need to be calculated from pump run times and system curves.

SCAP

SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS



If there are any questions or if additional information is required please to not hesitate to call or email at 760.230.4112 or sjepson@scap1.org

Sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Jepsen'.

Steve Jepsen

Executive Director SCAP