

SPILL EMERGENCY RESPONSE PLAN (SERP)

UPDATE (MAY 2023)

CSUDH
CALIFORNIA STATE UNIVERSITY
DOMINGUEZ HILLS

SERP Review and Approved By	Name/Title	Signature/Date
Legally Responsible Official (1)		
Legally Responsible Official (2)		
Legally Responsible Official (3)		

ACTIVITY CHANGE LOG (SERP)		
Date	Responsible Person/Title	Description Activity/Change

PART 1 (COMPLIANCE GUIDE)

PART 2 (FIELD GUIDE)

LIST OF TABLES

LIST OF ATTACHMENTS

Introduction

This document, the Spill Emergency Response Plan (SERP), formerly known as the Overflow Emergency Response Plan (OERP) has been prepared by Fischer Compliance LLC with assistance from California State University, Dominguez Hills (CSUDH) staff for complying with one of a series of updated regulatory requirements resulting from the State Water Resources Control Board 2022 adoption of the "reissued" Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems[1] (referred to as "the 2022 WDR" throughout this document."

One primary area of focus by the State Water Board through updated regulatory requirements in the 2022 WDR is *objective compliance* with effective implementation of elements of the CSUDH Sewer System Management Plan (SSMP). The State Water Board emphasizes urgency on the structure, content, and organization of an agency-specific SERP for ensuring effective spill, containment, control, and mitigation[2].

The effectiveness of the SERP is measured by the following objectives, providing CSUDH-specific translation of the corresponding State Water Board expectations for required effective spill responses:

- Implement effective and proactive spill containment, control, and mitigation
- Comply with State Water Board guidance on SERP implementation (see Attachment 1)
- Reduce future CSUDH WDR violations, potential water quality impacts, and nuisances
- Meet/exceed all WDR compliance points in a systematic, streamlined, and transparent manner to facilitate use by Legally Responsible Official(s), Managers, and field staff
- Measure and improve CSUDH SERP effectiveness (see Attachment 2)
- Expedite review by Water Board compliance inspectors and prepare CSUDH for future regulatory audits of the SERP

These objectives provide the cornerstone for PART 1 (COMPLIANCE GUIDE) of this document, formulated by Fischer Compliance LLC around a streamlined process for objectively reviewing each applicable SERP compliance point, presenting the method(s) for how CSUDH is complying with each requirement, and providing customized Key Performance Indicators (KPIs) for the CSUDH SERP for measuring effectiveness. PART 2 (FIELD GUIDE) includes streamlined information and procedures for CSUDH first responders and field operations staff.

Table 1 below provides a summary of applicable Spill Emergency Response Plan requirements for full compliance with the WDR.

[1] See Order No. 2022-0103-DWQ

[2] See Order No. 2022-0103-DWQ, Attachment D (page D-2) which states *"the State Water Board or a Regional Water Board may consider the Enrollee's efforts in implementing an effective Sewer System Management Plan to prevent, contain, control, and mitigate spills when considering Water Code section 13327 factors to determine necessary enforcement of this General Order."*

Table 1 - Summary of Applicable Spill Emergency Response Plan Requirements

Compliance Point	WDR Section	Page	Regulatory Requirements
1	Spec. 5.7	22	• Allocate necessary resources for spill responses
2-1	Spec. 5.12	23	• Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023); certify SERP up to date in Annual Report)
2-2	Spec. 5.12	24	• Targets and measures for protection of public health and environment
2-3	Spec. 5.12	24	• Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
3	Spec. 5.13	24	• Comply with Notification, Monitoring, Reporting, Recordkeeping requirements
4	ATT D-3	D-4	• Collaborate with storm drain agencies and ensure easement accessibility agreements for locations requiring operations
5-1	ATT D-4	D-5	• SERP training and practice drills
5-2	ATT D-4	D-4.4	• Inventory of sewer system equipment/identification of critical replacement and spare parts
6-1	ATT D-6	D-6	• Ensure Training/Implementation of SERP for staff and contractors
6-2	ATT D-6	D-6	• Address Emergency Operations/Traffic Control
6-3	ATT D-6	D-6	• Implement technologies, practices, equipment, coordination
6-4	ATT D-6	D-6	• Conduct Post-spill assessments
6-5	ATT D-6	D-6	• Annually review/assess effectiveness of SERP/update
see 2-1 above	ATT D-6	D-6	• Spill Emergency Response Plan/prompt detection/response
see 3 above	ATT D-6	D-6	• Notifications (primary responders, agencies)
see 3 above	ATT D-6	D-6	• Notifications (other potentially affected agencies)
see 3 above	ATT D-6	D-6	• Comply with WDR Att. E1 requirements
see 2-3 above	ATT D-6	D-6	• Containment, minimize/prevent spills to waters of state and drainage conveyances
see 2-2 above	ATT D-6	D-6	• Minimize public health and environmental impacts
see 2-2 above	ATT D-6	D-6	• Remove sewage from drain conveyance
see 2-2 above	ATT D-6	D-6	• Clean spill area/drain conveyance
see 4 above	ATT D-6	D-6	• Implement pre-planned coordination and collaboration with storm drain agencies
see 3 above	ATT D-6	D-6	• Document and report spill events

Compliance Evaluation

For preparing the SERP, an assessment was completed of CSUDH's existing spill prevention, containment, control, and mitigation effectiveness[3]. This included review of CSUDH's existing Overflow Emergency Response Plan (OERP), spill prevention/reduction strategies, field practices, data collection approach, critical spare parts/inventory, and field staff training. In addition, the inspection included review of data in the State Water Board's "California Integrated Water Quality System" (CIWQS[4]) including agency spill response metrics and benchmarks (see Table 2 below for details).

Table 2 – Spill Data and Compliance Benchmarks

Element	Benchmarks
• Spill Response Metrics (Agency notification - operator arrival)	< 1 hour (2018-2023)
• Notification Compliance (Category 1 spill notification to Cal-OES >2 hours)	0 violations (100% compliance, 2018-2023)
• Draft Reporting Compliance (Category 1 spills within 3 business days)	0 violations (100% compliance, 2018-2023)
• Spill Recovery (%) (2018-2023)	Cat 1/Cat 2 = none since 2018 Cat 3=82%

SERP Effectiveness

For facilitating review, assessment, and measurement of SERP effectiveness, Key Performance Indicators (KPIs) were generated for facilitating annual review, assessment, and update of the SERP for improving its effectiveness (see Attachment 2).

[3] See Order No. 2022-0101-DWQ, Provision 6.1.6 (Water Boards' considerations for discretionary enforcement purposes)
[4] CIWQS, publicly available at:
https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main

COMPLIANCE POINT #1

1-1 Regulatory Requirement

WDR Section	Summary of Requirements
Spec. 5.7 (p22)	• Allocate necessary resources for spill responses

1-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details on resources and implementation, see CSUDH SSMP Elements II (Organization), IV (O/M), and VI (Emergency Response Plan).

1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #1.

COMPLIANCE POINT #2-1

2-1-1 Regulatory Requirements

WDR Sections	Summary of Requirements
• Spec. 5.12 (pgs23-24)	• Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023) • Certify the SERP up to date in the Annual Report
• ATT D-6 (pgD-6)	• Prompt detection and response to spills to reduce spill volumes and collection information for prevention of future spills. • Containment, minimize/prevent spills to waters of state and drainage conveyances

2-1-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

2-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #2.

COMPLIANCE POINT #2-2

2-2-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Spec. 5.12 (p24)	• Targets for protection of public health and the environment
• ATT D-6 (pgD-6)	• Minimize public health and environmental impacts • Remove sewage from drain conveyance • Clean spill area/drain conveyance

2-2-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

2-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #2.

COMPLIANCE POINT #2-3

2-3-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Spec. 5.12 (p23-24)	• Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
• ATT D-6 (pgD-6)	• Containment, minimize/prevent spills to waters of state and drainage conveyances

2-3-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

2-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #2.

COMPLIANCE POINT #3

3-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Spec. 5.13 (p24) • ATT D-6 (pD-6)	• Comply with Notification, Monitoring, Reporting, Recordkeeping requirements • Notifications (primary responders, agencies) • Notifications (other potentially affected agencies) • Comply with WDR Att. E1 requirements and document and report spill events

3-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #3.

COMPLIANCE POINT #4

4-1 Regulatory Requirements

WDR Section	Summary of Requirements
• ATT D-3 (pD-4)	• Procedures: Collaborating with storm drain agencies
• ATT D-6 (pD-6)	• Implement pre-planned coordination and collaboration with storm drain agencies and other utilities/departments prior to, during and after a spill.

4-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- CSUDH utilizes the following resources for its storm drain collaboration activities: USGS mapping tool with watershed and topography information[5], California Board Basin Plan Beneficial Use Viewer tool,[6] and the State Water Board eWRIMS tool[7].
- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #4.

[5] See https://apps.nationalmap.gov/viewer/
[6] See https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=116f7daa9c4d4103afda1257be82eb16
[7] See https://waterrightsmaps.waterboards.ca.gov/viewer/index.html?viewer=eWRIMS.eWRIMS_gvh#

COMPLIANCE POINT #5-1

5-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.3	• SERP training and practice drills

5-1-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For ensuring compliance, CSUDH is conducting SERP training covering the following subjects for field staff:

    - Water Quality Monitoring
    - Pump Station Emergency Response Training and Drills
    - Spill Overflow Emergency Response/Spill Estimation
    - Bypass pumping

- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

5-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #5.

COMPLIANCE POINT #5-2

5-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.4	• Inventory of sewer system equipment/identification of critical replacement and spare parts

5-2-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

5-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #5.

COMPLIANCE POINT #6-1

6-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Ensure training/implementation of SERP for staff and contractors

6-1-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

6-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #6-1.

COMPLIANCE POINT #6-2

6-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Address Emergency Operations/Traffic Control

6-2-2 Compliance/Effectiveness

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional procedures, refer to the CSUDH Spill Response Field Guide.

6-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #6-2.

COMPLIANCE POINT #6-3

6-3-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Implement technologies, practices, equipment, coordination

6-3-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

6-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #6-3.

COMPLIANCE POINT #6-4

6-4-1 Regulatory Requirement

WDR Page #(s)	Section	Summary of Requirements
Page D-5	ATT D-6	• Conduct Post-spill assessments

6-4-2 Compliance

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional procedures, refer to the CSUDH Spill Response Field Guide.

6-4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #6-4.

COMPLIANCE POINT #6-5

6-5-1 Regulatory Requirement

WDR Page #(s)	Section	
Page D-5	ATT D-6	• Annually review/assess effectiveness of SERP/update

6-5-2 Compliance/Effectiveness

- The CSUDH Director of Environmental, Health and Safety is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the CSUDH Spill Response Field Guide.

6-5-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, CSUDH utilizes Attachment 2, Compliance Point #6-4.

LIST OF ATTACHMENTS

(These attachments are designed for assisting agencies in complying with the Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems (Order No. 2022-0103-DWQ)

Attachment 1 —WDR Implementation guidance (SWRCB)

The SERP implementation guidance provided by the State Water Board in this attachment is designed for helping sewer managers comply Order No. 2022-0103-DWQ.

Newly-Reissued
Statewide Sanitary Sewer Systems General Order
Effective June 5, 2023

Diana Messina, P.E., Regulatory Manager
State Water Resources Control Board

April 26, 2023 Roseville Training Event

1

Today's Regulatory Presentations

Initial 15 minutes – *Address information overload*

December 2022

- **The State Water Board reissued the Statewide Sanitary Sewer Systems General Order in its entirety**
- **Order becomes effective on June 5, 2023**
  - ***Everything is <u>not</u> due on June 5th***
- **Walk-thru Upcoming Compliance Items for Existing Enrollees**
  - **Due prior to June 5, 2023**
- **Overview of Longer-term Compliance**

Sit back, listen, ask questions, provide your examples.
Copy of presentation will be made available to all attendees

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Today's Regulatory Presentations

Later Presentation
Get into the weeds with needed clarification

- **"Regulatory Basics"**
- **Overview of the Reissued Order**
  - To understand the high-level changes and increased enforceability
  - To understand the Order Organization - Identifying Critical Sections
- **Why the Spill Emergency Response Plan is a Short-term compliance item?**
- **Examine approaches to the expanded Legally Responsible Official Designation**
- **Open Question and Answer Forum**

Sit back, listen, ask questions, provide your examples.
Copy of presentation will be made available to all attendees

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Short-Term Compliance Due Dates For Existing Enrollees

April 5 – June 4, 2023 (60-day window)	Item 1: Electronic Continuation of Regulatory Coverage to Reissued Order Current Legally Responsible Official Certifies in California Integrated Water Quality System (CIWQS)
June 5, 2023	Reissued Order is In Effect 2006 and 2013 Orders are rescinded
Due by June 5, 2023	Item 2: Existing SSMP must be uploaded into CIWQS Item 3: Spill Emergency Response Plan must be updated for implementation Item 4: All Spill Reporting per Reissued Order Item 5: Legally Responsible Official per Reissued Order

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Short Term Compliance

April 5 – June 4, 2023

Item #1: Electronic Continuation of Regulatory Coverage to Reissued Order

IMPORTANT!!!

90 and *60-day Notices issued to all LROs in CIWQS records*

Staff available today to assist an LRO in continuing coverage today!

Please spread the word to other agencies!

If missed:

- *Full loss of regulatory coverage starting June 5th until a full application package is submitted and approved*
- *Potential enforcement for no coverage*
  - *(Note – compliance records are now electronic)*

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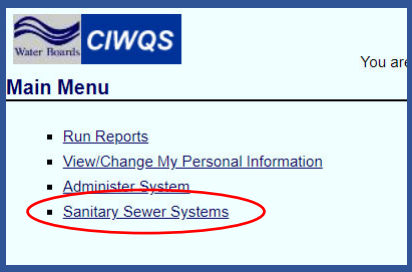
To Certify Continuation of Existing Regulatory Coverage

(Available since April 5th in CIWQS)

Current Legally Responsible Official logs into established CIWQS account



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To Certify Continuation of Existing Regulatory Coverage
(Available since April 5th in CIWQS)

- Collection System Annual Report ?
  Pertinent information regarding your collection system.
- Sewer System Management Plan Update ?
  Certify Sewer System Management Plan completion
- Reporting New Spill ?
  Submit Individual Spill Reports.
- Reporting New Private Lateral Sewage Discharge ?
  Submit Individual Private Lateral Sewage Discharge Reports.

Continuation of Existing Regulatory Coverage Certification
(must be completed by June 4, 2023)

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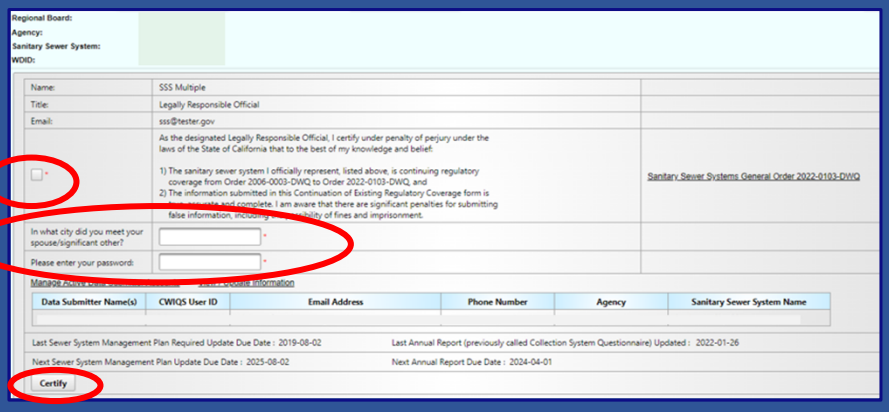
To Certify Continuation of Existing Regulatory Coverage



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Confirmation Message and Email
Continuation of Existing Regulatory Coverage

- Collection System Annual Report ?
  Pertinent information regarding your collection system.
- Sewer System Management Plan Update ?
  Certify Sewer System Management Plan completion
- Reporting New Spill ?
  Submit Individual Spill Reports.
- Reporting New Private Lateral Sewage Discharge ?
  Submit Individual Private Lateral Sewage Discharge Reports.

2023-04-26 10:07:45 [LRO Name] certified that the [Enrollee Name] is continuing regulatory coverage from General Order 2006-0003-DWQ to General Order 2022-0103-DWQ

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Short Term Compliance by June 5, 2023

Item #2: Existing Sewer System Management Plan (aka SSMP) must be uploaded into CIWQS

(If files size too big – insert link to online SSMP)

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State Water Resources Control Board

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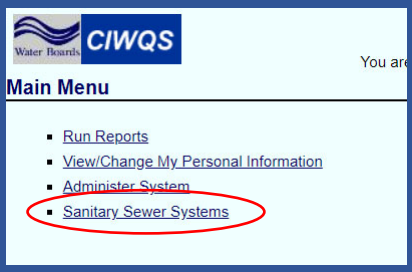
Uploading Existing Sewer System Management Plan
Available since April 5th in CIWQS

Current Legally Responsible Official logs into established CIWQS account



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Upload Existing Sewer System Management Plan documents
Available since April 5th in CIWQS

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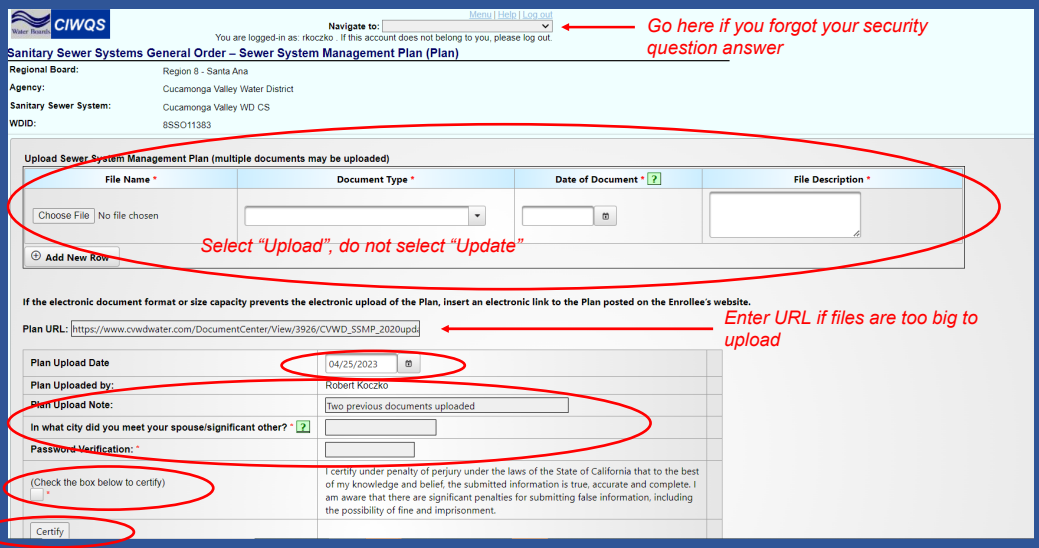
Upload Existing Sewer System Management Plan documents



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Short Term Compliance by June 5, 2023

Item #3: Spill Emergency Response Plan must be updated and implemented

(Not required to be submitted to CIWQS)

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Short Term Compliance by June 5, 2023

Item #4: Legally Responsible Official Designation in CIWQS per expanded qualifications in reissued Order

Questions for Audience

How many LROs here today?

How many LROs have viewed if they meet expanded qualifications in reissued Order?

How many enrollees here have concern that they will not be able to comply with the new LRO qualifications?

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Longer Term Compliance

(preparation is key)

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Preparing for Longer-Term Compliance

February 1, 2024 April 1, 2024	Annual Reporting of Cat 4 and Lateral Spills First Annual Report Submittal with 10-year performance graph	• Annual Report replaces existing Questionnaire
2024 or 2025	End of Audit Period Audit Reports due 6 months later	• Audit to identify gaps in SSMP • Audit Report to be Uploaded into CIWQS
July – Dec 2025 2025 or 2026	Service Area Boundary Map Sewer System Management Plan Update	Both to be uploaded into CIWQS Updated Plan w/ additional system-specific elements required in Attachment E

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More Details

In next presentation

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Diving Deeper Into the Newly-Reissued
Statewide Sanitary Sewer Systems General Order
Effective June 5, 2023

Welcome back!
Diana Messina, P.E., Regulatory Manager
State Water Resources Control Board

April 26, 2023 Roseville Training Event

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This Presentations
Get into the weeds with needed clarification

- **"Regulatory Basics"**
- **Overview of the Reissued Order**
  - High-level changes and increased enforceability
  - Navigating through the Order - Identifying Critical Sections
- **Why Spill Emergency Response Plan is a critical Short-term compliance item?**
- **The expanded Legally Responsible Official Designation**
- **Open Question and Answer Forum**

Sit back, listen, ask questions, provide your examples.
Copy of presentation will be made available to all attendees

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Regulatory Basics

The Clean Water Act

The California Water Code

The State Water Resources Control Board

The Nine Regional Water Quality Control Boards

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The 1972 Clean Water Act (CWA)

Federal

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1972 - Congress enacted the Clean Water Act

- *The primary federal law governing water quality*
- *To address pollution in the nation's waters and tributaries.*
- *Prohibits discharge of pollutants to a waters of the United States except as authorized by an NPDES permit*

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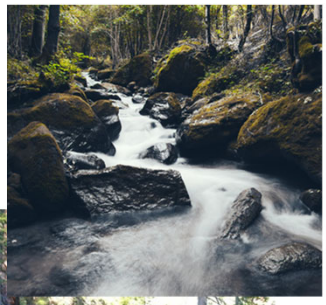

What is a Water of the United States?

Federal

A surface waterbody with deemed national importance to the United States:

- *Oceans, rivers, streams, lakes, creeks, marshes, wetlands, vernal pools, etc.*
- *Considered "jurisdictional" under the Clean Water Act*
- *In the regulatory jurisdiction of the United States Army Corps of Engineers (USACE)*

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Is a Dry Waterbody a Water of the United States?

Federal

Yes. A waterbody that is deemed a water of the U.S. is a water of the U.S. whether or not surface flow exists (surface and subsurface flow)

Many surface waters are hydrologically connected to shallow groundwater

Groundwater feeds surface water when levels are high

Surface water flows feed groundwater when groundwater levels are low

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California Water Code (WC)

State

State regulations that regulates pollution discharges to our Waters of the State.

Surface waters

- *Pacific Ocean*
- *Rivers, streams and creeks*
- *Manmade infrastructure conveying natural flows,*
- *Vernal pools, marshes and wetlands,*
- *Washes and Sloughs*
- *Lagoons and Estuaries*
- *Other*

Waters of the U.S. (federal surface waters) are a subset of Waters of the State

Groundwater

Statewide Sanitary Sewer Systems General Order

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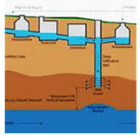
How would a sewage spill enter groundwater?

1. Through engineered infrastructure specifically designed to maximize infiltration of stormwater



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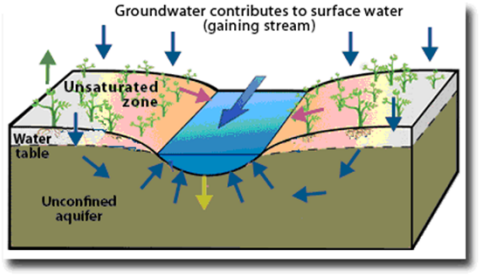
How would a sewage spill enter groundwater?

2. Through a hydrologically connected surface water body
   - A gaining stream
   - A losing stream



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What are the State Water Resources Control Board and Nine Regional Water Quality Control Boards

10 Governor-appointed Boards established by the Water Code

The State Water Board

- Regulates statewide water quality, water rights and drinking water

The Nine Regional Water Boards

- Regulate water quality within own region (primary watershed)
- Enforce State Water Board statewide Orders

Statewide Sanitary Sewer Systems General Order

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Nine Regional Water Quality Control Boards

- Nine Regional Water Boards
  - Regulate water quality within own region (primary watershed)
  - Enforce Statewide Orders and their Regional Water Board Orders
    - Per 2017 State Water Board Enforcement Policy

Statewide Sanitary Sewer Systems General Order 30

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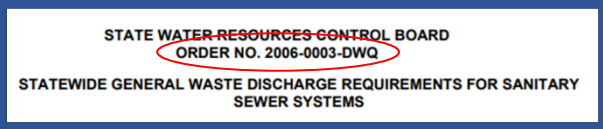
How are Sewage Spills Regulated?

Per Water Code Authority

- State Water Board adopts statewide Waste Discharge Requirements (WDRs or General Order)
- Nine Regional Water Boards enforce the statewide Order
  - In 2006


STATE WATER RESOURCES CONTROL BOARD
ORDER NO. 2006-0003-DWQ

STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

Item 8. *It is the State Water Board's intent to gather additional information on the causes and sources of SSOs to augment existing information and to determine the full extent of SSOs and consequent public health and/or environmental impacts occurring in the State.*

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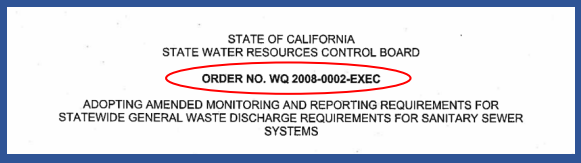
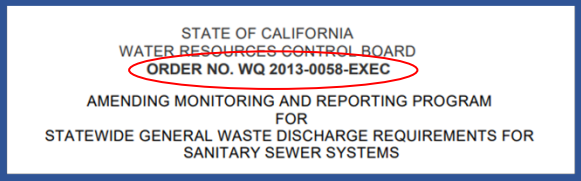
How are Sewage Spills Regulated?

Per Water Code Authority

- In 2008


STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
ORDER NO. WQ 2008-0002-EXEC
ADOPTING AMENDED MONITORING AND REPORTING REQUIREMENTS FOR STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

- In 2013


STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
ORDER NO. WQ 2013-0058-EXEC
AMENDING MONITORING AND REPORTING PROGRAM FOR STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

Item 10. *Based on over six years of implementation of the SSS WDRs, the State Water Board concludes that the February 20, 2008 MRP must be updated to better advance the SSO Reduction Program objectives, assess compliance, and enforce the requirements of the SSS WDRs.*

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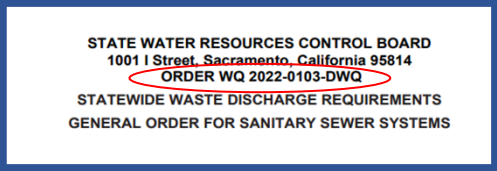
State Water Board *Reissued* the Statewide Order Regulating Sewage Spills

- Dec 2022

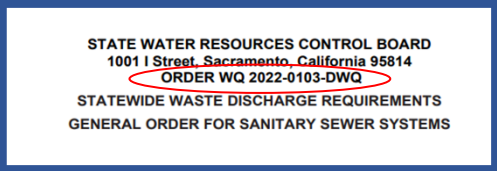

STATE WATER RESOURCES CONTROL BOARD
1001 I Street, Sacramento, California 95814
ORDER WQ 2022-0103-DWQ
STATEWIDE WASTE DISCHARGE REQUIREMENTS
GENERAL ORDER FOR SANITARY SEWER SYSTEMS

Section 3. Findings addressing, at minimum:

- Water Code Authority to protect waters of the State and their beneficial uses
- Need for Proactive System Management
- Protection of our Drinking Water Supply
- Climate Change Impacts on Infrastructure and Regulatory Programs
- Human Right to Water for all Californians
- Open and accessible data

Reissued Statewide Waste Discharge Requirements (General Order)

- Dec 2022


STATE WATER RESOURCES CONTROL BOARD
1001 I Street, Sacramento, California 95814
ORDER WQ 2022-0103-DWQ
STATEWIDE WASTE DISCHARGE REQUIREMENTS
GENERAL ORDER FOR SANITARY SEWER SYSTEMS

Continues Existing Regulatory Structure of 2006 Order

- Effective on June 5, 2023
- 2006 and 2013 Orders currently still in effect
- On June 5, 2023:
  - The 2006 and 2013 Orders are rescinded (no longer in effect)
  - Re-issued Order supersedes the 2006 and 2013 Orders

Reissued Statewide Waste Discharge Requirements (General Order)

The reissued Order is not a new Order:

- Continues regulating the same type of public systems plus private systems, as applicable
- Updates the 17-year-old statewide Order to:
  - Clarifies existing Water Code authority:
    - Addresses spills to waters of the State (surface and groundwater)
    - Addresses climate change impacts on a system-specific level
  - Reduces some spill reporting frequencies
  - Extend audit and planning periods

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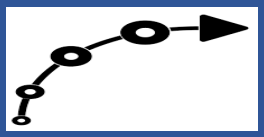
16-year Evolution: 2006 - 2022



Focus of 2006 Order	Expanded Focus of Reissued Order

• Clean Water Act
  • Spills to waters of the United States
• Spill Reports
• Development of a Sewer System Management Plan (SSMP)
	• Clean Water Act and Water Code
	  • Spills to waters of the States (includes waters of the U.S.)
	• Spill Reports
	• Development and effective implementation of SSMP
	• Emphasize on "system-specific"
	• Long-term system resiliency
	• Adaptability of utility management to address changing impacts

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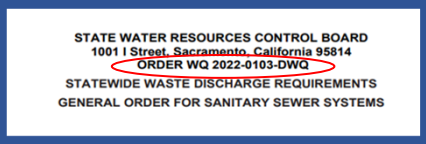
Enhanced Enforceability



Reissued Order requires:

- Full electronic reporting into CIWQS
  - Spill Reports
  - Audit Reports
  - Sewer System Management Plans
- Enhanced Legally Responsible Official qualifications
- Enhanced Penalty of Perjury clause in CIWQS when electronically submitting reports

Regional Boards will have electronic CIWQS reports of non-compliance

Goal – public transparency of sewer system compliance

High-level Order Changes

1

High-level *Administrative Changes* in Re-Issued Order

- Structure of Order – One document
- Streamlined transfer of existing Enrollee enrollment
- Expanded scope for regulating privately-owned systems (Regional Boards discretion)
  - Clarification for federally-owned facilities
- Enhanced qualifications for Legally Responsible Official
  - To certify compliance with entire Order

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High-level *Regulatory Changes* in Re-Issued Order

- Clarified definition of "Spill"

  A discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system overflow, operational failure, and/or infrastructure failure.

- Clarified prohibition of sewage to a surface water unless properly cleaned up and reported
- Prohibition of sewage to waters of the State (Full implementation of Water Code compared to only waters of the U.S.)

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High-level *System Management* Changes in Re-Issued Order

Additional SSMP Elements

- Emphasis on:
  - Implementation of effective SSMP
  - Effective Emergency Spill Responses to minimize sewage to waters of the State
  - Examination of system-specific climate change impacts to proactively address causes of future spills
  - Problem system areas identified by condition assessment data and previous spill information
  - Further source control for wipes, rags, debri and other causes of blockage
- Prioritization of capital improvement projects based on data from condition assessments, past spills, etc.

Note – SSMP Element subjects did not change
SSMPs do not need to be re-written

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High-level *Notification and Monitoring Changes* in Re-Issued Order

- 2-hour CA Office of Emergency Service notification of Category 1 and 2 Spills (>1000 gallons)
- Water quality monitoring within 18 hours of knowledge of spill
- Enhanced data collection of spill observations
- Clarified receiving water monitoring for >50,000 gallon spills to surface waters
- Use of Environmental Laboratory Accreditation Program (ELAP)-certified lab for sample analysis

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High-level *Reporting Changes* in Re-Issued Order

- Full electronic reporting in CA Integrated Water Quality System (CIWQS) for compliance determination
  - Existing Sanitary Sewer Management Plan
  - Individual spill reports
  - Future Audit Reports
  - Sewer System Management Plan Updates
- Reduced reporting frequency of small spills and of spills from agency-maintained laterals
- Annual Report (in place of questionnaire)
  - Includes system-specific spill performance graphs for Enrollee to report system performance
- Longer periods between audits and sewer system management plan updates

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General Order Organization

Identifying Critical Sections

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General Order Organization

Informational

Sections for information and clarification only

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General Order Organization

Critical sections containing compliance requirements for Enrollees

Important to understand and implement

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For clarification of terms

For quick reference

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Let's look at Section 4. Spill Prohibitions

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Section 4. Prohibitions

4.1. Any sewage discharge that has the potential to discharge to surface waters *unless promptly cleaned up and reported*.

Not all spills violate a Prohibition

An effective Spill Emergency Response and coordination with storm drainage agency:

- May capture and cleans up entire spill –
  - Eliminating a violation of prohibition
  - Eliminating basis for 3rd party CWA lawsuit
- May minimize amount of sewage to receiving water
  - Potential reduction in monitoring and enforcement

Note – a municipal storm conveyance system is (typically) not a surface water

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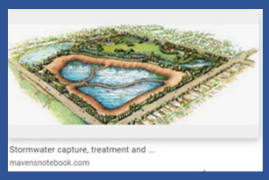
Section 4. Prohibitions

4.2. Any sewage discharge directly or indirectly through a drainage conveyance system or other route, to waters of the State.

Importance of coordination with local storm drainage agency:

- Know where your spill is going
  - Spills to dedicated groundwater recharge is not a violation of Prohibition 4.1
  - Avoid erroneous report of spill as a federal violation
  - Eliminate potential basis for 3rd party CWA lawsuit

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Section 4. Prohibitions

4.3. Any sewage discharge that creates a nuisance or condition of pollution.

See definition in Attachment A

Nuisance: For the purpose of this General Order, a nuisance, as defined in Water Code section 13050(m), is anything that meets all of the following requirements:

- Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property…;
- Affects at the same time an entire community or neighborhood, or any considerable number of persons…;
- Occurs during, or as a result of, the treatment or disposal of wastes.

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Overview of Section 5. Specifications

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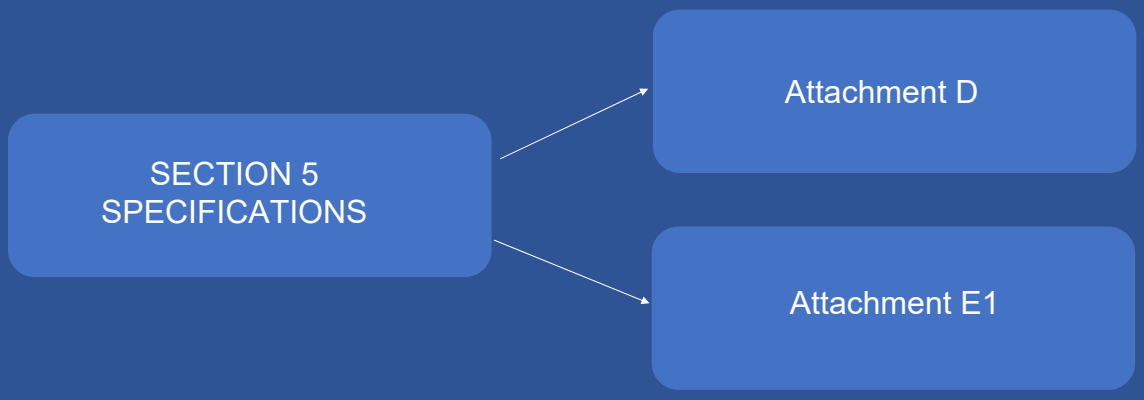
Section 5 – Provides all Requirements

Attachments D and E1 - Provide Requirement Details



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Be very familiar with these sections

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Quick Overview of

Section 5. Specifications

5.1 & 5.8: Designation of a Legally Responsible Official and Data Submitters

5.2 - 5.5: Sewer System Management Plan and Audit requirements

5.6: System Resilience

5.7: Allocation of Resources

5.9: Reporting Certification under penalty of perjury

5.10: System Capacity

5.11: System Performance Analysis (running 10-year)

5.12.: Spill Emergency Response Plan and Remedial Actions

5.13: Spill-specific Notification, Monitoring, Reporting and Recordkeeping Requirements (including Spill Categories)

5.14: Electronic Boundary Map

5.15 - 16: Voluntary Reporting

5.17-10: Other

IMPORTANT!!!

Implementation is "system-specific" (find/count)

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Be familiar with Updated Spill Categories in Section 5.13.

Category 1

Any volume of sewage that discharges to:

- **A surface water**, including a surface water body that contains no flow or volume of water, or
- A drainage conveyance system that discharges to a surface water, when the sewage is not fully captured and returned to the sewer system or disposed of properly.

Category 2

A spill of 1,000 gallons or greater that does not discharge to a surface water.

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Updated Spill Categories in Section 5.13., continued

(Existing Category 3 separated for reduced reporting of small spills)

2006 Order

Category 3

A spill of less than 1000 gallons, that does not discharge to a surface water.

Reissued Order (2022-0103-DWQ)

Category 3

A spill equal to or greater than 50 gallons, and less than 1000 gallons, that does not discharge to a surface water.

Category 4

A spill of less than 50 gallons that does not discharge to a surface water.

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Notifications, Monitoring, Reporting and Recordkeeping Requirements

- Attachment E1: Contains all detailed requirements per Categories
  (fully replaces 2013 Order)
- Attachment E2: Summary of Spill-specific Requirements
- *Five Tables for Quick Reference - with section reference to Attachment E1*

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Back to Short-Term Compliance Due Dates

Upcoming Compliance Dates for Existing Enrollees

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Focus on Short-Term Compliance

April 5 – June 4, 2023 (60-day window)	✓ Item 1: Electronic Continuation of Regulatory Coverage to Reissued Order	Current Legally Responsible Official Certifies in CIWQS
June 5, 2023	Reissued Order is In Effect 2006 and 2013 Orders are rescinded	
Due by June 5, 2023	✓ Item 2: Existing SSMP must be uploaded into CIWQS Item 3: Spill Emergency Response Plan must be updated for implementation Item 4: All Spill Reporting into CIWQS per Reissued Order, Attachment E1 Item 5: Legally Responsible Official per Reissued Order	

Short Term Compliance by June 5, 2023

Item #3: Spill Emergency Response Plan must be updated and implemented

(Not required to be submitted to State Water Board)

Spill Emergency Response Plan

Must be updated annually to address for prompt detection and response to spills

- Notification of primary responders, regulatory agencies and affected entities
- Coordination with storm drain agencies and other utility agencies
  - Spill containment to prevent/minimize discharge to waters of the State
  - Appropriate clean up per drainage agency standards (and per NPDES permit)

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Spill Emergency Response Plan

Must address:

- Notification to CalOES, as applicable
- Spill clean up and documentation
- Monitoring and reporting requirements per Spill Category (Attachment E1)
- Collection of spill information for prevention of future spills
- Post-spill assessment of spill response activities
- Other – See Section 6 of Attachment D

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Why Emergency Response Plan must be Updated Now

(although a part of the SSMP)

- A quick effective response:
  - Can prevent a violation of one or more prohibitions
  - Will reduce spill volume to surface waters
  - May prevent sampling requirements
- Local utility agency coordination is a must-have
  - Immediate access to drainage conveyance system
  - Advanced coordination provides immediate action to block and clean up spill
  - Knowing if drainage leads to groundwater infiltration or retention prevents erroneously Category 1 spill reporting
- Documentation provides defense from a 3rd party lawsuit
  - Sewage discharges to groundwater are not a federal violation
- Have an Environmental Laboratory Accreditation Program (ELAP) laboratory

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Short Term Compliance by June 5, 2023

Item #4: Legally Responsible Official Designation in CIWQS

Attachment A: Definitions

A Legally Responsible Official is an official representative, designated by the Enrollee, with authority to sign and certify submitted information and documents required by this General Order.

- Spill Reports -
- Annual Reports (showing system performance) -
- Audit Reports -
- Sewer System Management Plans -

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State Water Resources Control Board

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Section 5.1: Legally Responsible Official Designation

The Legally Responsible Official must:

- Have the authority to ensure Enrollee complies with the Order
- Serve as the duly authorized representative

The Legally Responsible Official must:

- Have responsibility over management of the Enrollee's entire sanitary sewer system
- Be authorized to make managerial decisions that govern the operation of the system
  - Including implicit or explicit duty of making major capital improvement recommendations to ensure long-term compliance
- Have direct authority over individuals that:
  - Possess a degree or certificate related to operations and maintenance of sanitary sewer systems, and/or
  - Have professional training and experience related to the management of sanitary sewer systems

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Why the Expansion of the Legally Responsible Official Qualifications

Expanded LRO Qualifications		Expanded Focus of Reissued Order (beyond spill reporting)
• Have responsibility over management of the Enrollee's entire sanitary sewer system	→	• Development and effective implementation of SSMP
• Be authorized to make managerial decisions that govern the operation of the system • Including making capital improvement recommendations for long-term compliance	→	• Long-term system resiliency • Adaptability of utility management to address changing impacts
• Have direct authority over degreed, certified, experienced, trained system personnel	→	• Emphasize on "system-specific"

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Why the Expansion of the Legally Responsible Official Qualifications

In Greater Detail

Expanded LRO Qualifications	Expanded Focus of Reissued Order (beyond spill reporting)
• Have responsibility over management of the Enrollee's entire sanitary sewer system	• Examination of annual performance and long term spill trends • Examination of system-specific climate change impacts to proactively address causes of future spills
• Be authorized to make managerial decisions that govern the operation of the system • Including making capital improvement recommendations for long-term compliance	• Address problem system areas identified by condition assessment data and previous spill information
• Have direct authority over degreed, certified, experienced, and trained system personnel	• Prioritization of capital improvement projects based on data from condition assessments, spills • Further source control for wipes, rags, debris and other causes of blockage

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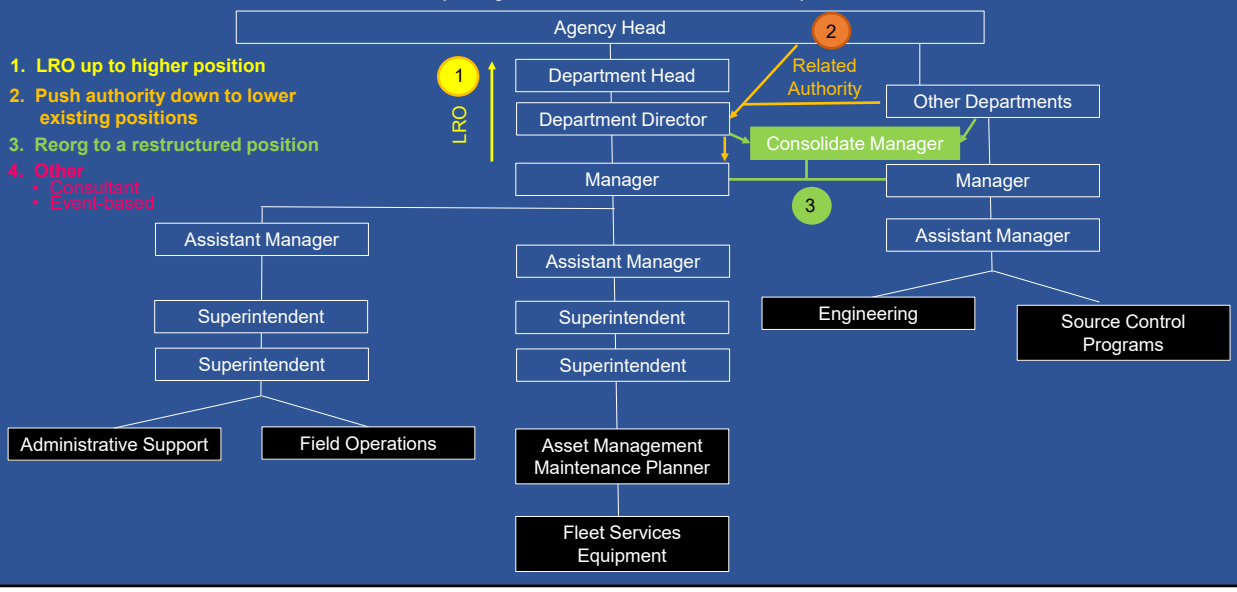
Examining Potential [Regulation-driven] Options for Legally Responsible Official Designation

Example Organizational Chart for Discussion Purposes



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Longer Term Compliance

(preparation needed for upcoming due dates)

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Longer-Term Compliance

February 1, 2024 April 1, 2024	Annual Reporting of Cat 4 and Lateral Spills First Annual Report Submittal	Annual Report replaces Questionnaire
2024 or 2025	End of Audit Period Audit Reports due 6 months later	• Audit to identify gaps in SSMP • Audit Report to be Uploaded into CIWQS
2025 or 2026 July – Dec 2025	Sewer System Management Plan Update Service Area Boundary Map	• Updated Plan w/ additional system-specific elements required in Attachment E • Both to be uploaded into CIWQS

CALIFORNIA WATER BOARDS State Water Resources Control Board

Statewide Sanitary Sewer Systems General Order

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Plan **Audit** Due Dates for Existing Enrollees

Population that Served as Basis for Initial SSMP Due Date	Required Plan Audit Due Dates per Order 2006-0003-DWQ						End of current 3-year Audit period*
> 100,000	5/2/2011	5/2/2013	5/2/2015	5/2/2017	5/2/2019	5/2/2021	5/2/2024
100,000 to 10,000	8/2/2011	8/2/2013	8/2/2015	8/2/2017	8/2/2019	8/2/2021	8/2/2024
10,000 to 2,500	5/2/2012	5/2/2014	5/2/2016	5/2/2018	5/2/2020	5/2/2022	5/2/2025
< 2,500	8/2/2012	8/2/2014	8/2/2016	8/2/2018	8/2/2020	8/2/2022	8/2/2025

** The Audit Report is due within six months after the end of the required 3-year audit period.*

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Sewer System Management Plan Update Due Dates for Existing Enrollees

Population that Served as Basis for Initial SSMP Due Date	Original Required Plan Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Upcoming (6-year) Plan Update Due Date
> 100,000	5/2/2009	5/2/2014	5/2/2019	5/2/2025
100,000 to 10,000	8/2/2009	8/2/2014	8/2/2019	8/2/2025
10,000 to 2,500	5/2/2010	5/2/2015	5/2/2020	5/2/2026
< 2,500	8/2/2010	8/2/2015	8/2/2020	8/2/2026

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Sewer System Management Plan Crosswalk

Attachment D of General Order

Enrollee-specific Audit (2024 or 2025) to identify gaps for Plan Update (2025 or 2026)

Existing General Order	Reissued General Order
1.Goal	1. Sewer System Management Plan Goal and Introduction
2. Organization	2. Organization
3. Legal Authority	3. Legal Authority
4. Operations and Maintenance Program	4. Operation and Maintenance Program
5. Design and Performance Goals	5. Design and Performance Provisions
6. Overflow Emergency Response Plan	6. Spill Emergency Response Plan
7. Fats, Oils, and Grease (FOG) Control Program	7. Sewer Pipe Blockage Control Program
8. System Evaluation and Capacity Assurance Plan	8. System Evaluation, Capacity Assurance and Capital Improvements
9. Monitoring, Measurement, and Program Modifications	9. Monitoring, Measurement and Program Modifications
10. Sewer System Management Plan (SSMP) Program Audits	10. Internal Audits
11. Communication Program	11. Communication Program

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Electronic Service Area Boundary Map

To be submitted between July – Dec 2025

- Detailing the boundary of the Enrollee's service area
- Mapping specifications on State Water Board program webpage by June 5, 2023
- The Legally Responsible Official shall submit the geospatial data:
  - Starting July 1, 2025, and no later than December 31, 2025

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Training and Customer Assistance taking place statewide...

- Water Board staff will continue to assist in professional training of regulations:
  - California Water Environment Association
    - Develop and deliver cost-effective interactive online trainings
  - Order implementation workshops
- Looking to Consultants and Industry associations to
  - Develop guidance documents
  - Conduct Order implementation training events
  - Assist Enrollees to stay in ongoing compliance

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Thank you

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https://www.waterboards.ca.gov/water_issues/programs/sso/

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SanitarySewer@waterboards.ca.gov

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Attachment 2 — SERP Report Card

The SERP Report Card developed in this attachment is designed for helping sewer managers charged with annually reviewing and assessing the SERP effectiveness and identifying any necessary updates to comply with ATT D-6 (Order No. 2022-0103-DWQ).

No.	WDR	SERP Key Performance Indicators (KPIs)	Evaluation Schedule	Success Rate (%)
COMPLIANCE POINT #1				
1.1	5.7	Annual Emergency Response Operations Expenditures vs. Budget Amount	Annual	
1.2	5.7	Annual Emergency Response Equipment Expenditures vs. Budget Amount	Annual	
COMPLIANCE POINT #2				
2.1	5.12	SERP Certified in Annual Report is Up to Date	Annual	
2.2	5.12	Annual Review/Assessment of SERP Completed by Required Due Date	Annual	
2.3	5.12	SERP Modifications Documented in Change Log	Each Event	
2.4	5.12	Spill Volume Recovered and Properly Disposed	Annual	
2.5	ATT D-6	Category 1 Spills Prevented Due to Containment Operations	Annual	
2.6	ATT D-6	Spill Volume Recovered from Drainage Conveyance Systems	Annual	
2.7	5.13	Response Time Goals Met (Response = Receipt of Call to operator arrival)	Annual	
COMPLIANCE POINT #3				
3.1	5.13	Field Records Match Data Input into CIWQS (each Report)	Annual	
3.2	ATT D-6	Outside Agencies Contacts Up to Date	Annual	
3.3	ATT D-6	Category 1 Spills Requiring Water Quality Monitoring Sampled w/in 18 hours	Each Event	
3.4	ATT D-6	Compliance with Regulatory Reporting Deadlines	Annual	
3.5	ATT D-6	Field Data Collection Forms Verified for Completeness and Accuracy	Each Event	
3.6	ATT D-6	Spill Notifications from the Public and Remote Sites Functioned as Intended	Annual	

No.	WDR	SERP Key Performance Indicators (KPIs)	Evaluation Schedule	Success Rate (%)
COMPLIANCE POINT #4				
4.1	ATT D-3	Easements Inspected to Ensure Access	Semi Annual	
4.2	ATT D-3	Obtain Easement Access Agreements	Annual	
4.3	ATT D-3	Number of times Easement Access Inhibited Spill Response Activities	Annual	
4.4	ATT D-3	Adherence to Agreed-Upon Coordination/Procedures w/Storm Drain Owner	Each Event	
COMPLIANCE POINT #5				
5.1	ATT D-4	SERP Training and Assessments Performed for all Appropriate Field Staff	Annual	
5.2	ATT D-4	Response Staff Training Records Complete and Up to Date	Annual	
5.3	ATT D-4	Response Staff Participation in Annual Spill Response Drills	Annual	
5.4	ATT D-4	Response Staff Qualified on Response Drill Procedures and Practices	Annual	
5.5	ATT D-4	Equipment Inventory and Critical Spare Parts List Up to Date	Annual	
5.6	ATT D-4 ATT D-6	Contractors Trained and Documented in Accordance with SERP	Annual	
COMPLIANCE POINT #6.1				
6.1	ATT D-6		Annual	
COMPLIANCE POINT #6.2				
6.2	ATT D-6	Adherence to SERP for Emergency System Operations/Response Activities	Annual	
COMPLIANCE POINT #6.3				
6.3	ATT D-6	Effective Implementation of Technologies and Inter Agency Coordination	Annual	
6.4	ATT D-6	Effective Implementation of Established Mutual Aid Coordination	Annual	
COMPLIANCE POINT #6.4				
6.5	ATT D-6	Post Spill Assessments Completed for Each Spill Event	Annual	
6.6	ATT D-6	Modifications to SERP Implemented	Annual	

Attachment 3 — Spill Category Determination Worksheet

Spill Category Determination Worksheet

Step 1

Determine Responsibility:

- ☐ **Private** (Source of Problem is within privately-owned system)
- ☐ **Other Public Agency** (Source of Problem is within publicly owned system NOT operated by Your Agency)
- ☐ **Your Agency** (Source of Problem is within YOUR agency's system.) If YES, answer the questions below in order, beginning with Category 1

Step 2

Answer the questions below, in order, beginning with Category 1. When you determine the correct category, check the box to the left)

☐ **Is a CATEGORY 1 (if answer to ANY question is Yes)**	
Discharge to Surface Water?	☐ Yes ☐ No
Discharge to Drainage Conveyance System that Discharges to Surface Water, but NOT Fully Captured?	☐ Yes ☐ No
Exfiltrated to Hydraulically Connected Surface Water?	☐ Yes ☐ No

☐ **Is CATEGORY 2 (if spill is NOT a Category 1, and answer to question is Yes)**	
Is Discharge Volume 1,000 Gallons or Greater?	☐ Yes ☐ No

☐ **Is CATEGORY 3 (if spill is NOT a Category 1, and answer to question is Yes)**	
Is Discharge Volume greater than 50 gallons and less than 1,000 Gallons?	☐ Yes ☐ No

☐ **Is a CATEGORY 4 (if spill is NOT a Category 1 and answer to question is Yes)**	
Is Discharge Volume is Less than 50 Gallons	☐ Yes ☐ No

Attachment 4 — Spill Time Estimation Worksheet

Spill Start Time Estimation Worksheet

Milestones				
Agency Notified	Date:		Time:	☐ AM ☐ PM
Spill First Observed by Caller	Date:		Time:	☐ AM ☐ PM
Caller Observed Not Spilling	Date:		Time:	☐ AM ☐ PM
Spill First Observed by Agency	Date:		Time:	☐ AM ☐ PM
Spill End Time	Date:		Time:	☐ AM ☐ PM

Caller/Witness Description of the Spill

First Responder Description of the Spill

Site Conditions			
Evidence of Solids ☐ YES ☐ NO	Distance Solids Traveled from Spilling Structure:		Feet
Other Observations:			
	Spill Rate:		GPM

Calculation Sheet
(Can be used if volume can be determined without duration i.e., measured volume method)

Spill Volume: _____ Gals

Duration: _____ Minutes ÷ Spill Rate: _____ GPM = _____ Minutes

Spill End Time: ☐ AM ☐ PM - Duration: Minutes = **Spill Start Time**

Spill Start Time Estimation Worksheet

Describe how information was used to establish the basis for spill start time estimate

Responsible Person			
Estimation Determined By:		Date:	
Spill Event ID (From CIWQS)		Spill Name:	
Start Time:	☐ AM	☐ PM	**Date:**

Start Time:
The start time is sometimes difficult to establish. Many times, a combination of methods will need to be employed. Here are some approaches:

Nearby Witnesses:
Residents and/or witnesses' interviews can be used to establish the start time. Inquire as to their observations. Spills that occur in public rights-of-way (streets, shopping centers, etc.) are usually observed and reported promptly. Spills that occur out of the public view (fields, access roads, etc.) can go on longer.

Observed Flow Rate + Volume:
If the flow rate and volume spilled can be reasonably determined, this information can be used to work backwards to better determine the spill start time.

Example:

Time the spill was discovered	9:00 am	
Crews determined the spill rate	10 GPM	540 ÷ 10 = **54 minutes total duration of spill time**
Completely contain and measure the spill volume,	540 gallons	
Spill end time	9:26 am	9:26 am – 54 minutes =
Spill start time	8:32 am	

This assumes that the flow rate was the same throughout the entire spill. You can consider the diurnal flow patterns, if available, and fine-tune the start time.

Spill Start Time Estimation Worksheet

Telemetry Data:

Lift stations and flow recorders utilize SCADA and Manholes and vaults can be monitored using Level Sensors. The data collected by these devices will indicate when flows have changed due to a blockage. A blockage upstream or downstream of a flow recorder will cause measured flows to increase or decrease. A blockage upstream of a lift station will reduce the flows into the station and cause the pumps to run less frequently. Comparing typical daily flows to the change in flows due to a blockage can help to determine spill start time.

Site Conditions:

Conditions at the spill site change over time. Initially there will be limited deposits of toilet paper and other sewage solids. After a few days to a week, the sewage solids form a light-colored residue. After a few weeks to a month, the sewage solids turn dark. The quantity of toilet paper and other materials of sewage origin increase over time. The sewer solids/tissue paper will dry over time. These observations can be used to help estimate the start time and to support assumptions. Taking photographs to document the observations can be helpful if questions arise later in the process. In addition, A low spill rate and a large amount of sewage spilled might indicate a longer duration.

Accounting for Flow Variation:

It is important to remember that spills may not be continuous. Blockages are not usually complete (some flow continues). Refer to agency diurnal flow patterns for typical flow variations. Response personnel should open the first manhole downstream from the blockage and, if flow is observed, measure, document and take pictures.

Spills that occur due to peak flows in excess of capacity will occur only during, and for a short period after, heavy rainfall. Use available rainfall data as appropriate.

Interviews:

Interview the caller and ask, "when did you first observe the spill." Also ask "can you recall the last time you observed it was not spilling." This will help you to establish a Start Time window. "…I first noticed the spill at 8:20 am. Last night when I came home from dinner at 7:30 pm last night it was not spilling." This information in conjunction with spill volume, spill rate, site data, personal experience, etc. can help to make the best estimation under the circumstance.

Is it Reasonable:

When you believe you have done all you can and you have reached a conclusion, ask yourself "… is it reasonable to believe this spill began at (time) based on all the other evidence.

End Time:

The end time is usually much easier to establish. Once the sewage is contained in the system (e.g., in the manhole, wet well, clean out, etc. the spill has ended.

Attachment 5 — Spill Duration and Flow Worksheet

Duration and Flow Rate Worksheet

Table A		
Spill Start Time (See Spill Start Time Estimation Worksheet)	1	☐ AM ☐ PM
Spill End Time (See Spill Response Field Report, Page 4)	2	☐ AM ☐ PM
Duration (Subtract 1 from 2)	3	Minutes
Spill Rate	4	GPM
Total Volume (Multiply #3 x #4)	**5**	**Gallons**

Required Photo & Video	
☐ Photo of Spilling Structure Attached	☐ 10-Second Video of Spilling Structure on File

Method to Determine Spill Rate	
☐ Flow Monitoring	☐ Single Family Home Flow Chart
☐ Spill Rate Calculator	☐ Photo Comparison
☐ Eyeball Method (Only for Low Spill Rates ≤ 10 Gallons)	
☐ Other:	
Notes:	
☐ Attach Calculation Worksheets	

Responsible Person				
Estimation Determined By:			Date:	
Spill Event ID (From CIWQS)		Spill Name:		
Start Time:		☐ AM ☐ PM	**Date:**	

Attachment 6 — Spill Measured Volume Estimation Worksheet

Measured Volume Spill Estimation Worksheet

Spill Event ID (from CIWQS) _____, Spill Name: _____

* Depths: Asphalt = 0.0013′ Concrete = 0.26′ Ponding = Average Measured Depth

Table A

Area ID	Surface	Length	x	Width	x	% Wet	Depth*	=	Volume (c.f.)
			x		x			=	
			x		x			=	
			x		x			=	
			x		x			=	
			x		x			=	

☒ Attach Photo(s) of Wetted Perimeter Total Volume:

Table B

Total Volume:		**x**	**7.48 (Gallons/Cubic Foot)**	**=**		**Gallons**
Completed By: _____ Date: _____/_____/_____						

Measured Volume Spill Estimation Worksheet

This method can be used when:

- The limits of the wetted area can be determined.
- The surfaces are dry prior to the spill.
- Sewage has left a wet stain on hard surfaces.
- Sewage has ponded and the depth can be measured.
- Sewage is contained in a structure like a storm drain or vault.

The Procedure on hard surfaces:

Step 1. **Sketch the perimeter of the spill/wetted area.**

Step 2. **Identify the surface type.**

i. Determine the depth of the wet area.

Step 3. **Break down the wetted area into shapes using rectangles and/or squares.**

i. Use cones to mark the corners of the shape.

a. This improves measurements.

b. Helps ensure all portions of the wetted area are measured.

c. Helps ensure the same area is not measured twice.

Step 4. **Label Each Shape (This is the Area ID)**

i. Use Letters so they are not confused with the measured dimensions.

Step 5. **Measure each shape.**

Step 6. **Estimate the percentage of the shape that is wet.**

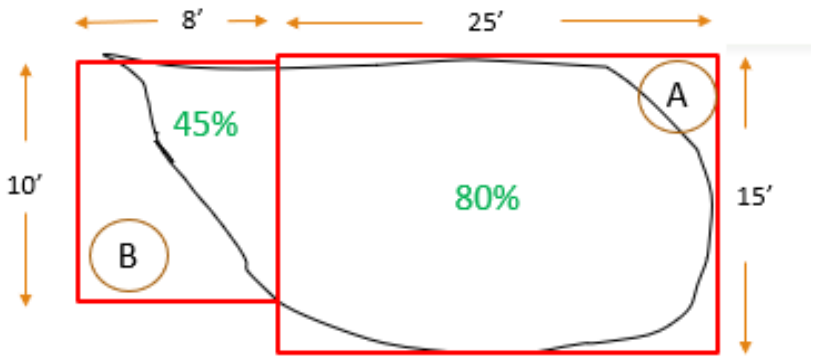
Step 7. **Complete Table A**

i. Transfer Total Volume to Table B

Step 8. **Complete Table B**

Step 9. **Sign and date to indicate who completed the form.**

Example



Attachment 7 — Spill Upstream Connections Volume Estimation Worksheet

Upstream Connections Spill Volume Estimation Method

NOTES:

- A Single-Family Residential Unit is One Equivalent Dwelling Unit (EDU)
- This Method Can Be used for a Single Home/Building or Multiple Homes/Buildings

Procedure:

Step 1: Determine the Location of the Blockage

i. This May Require CCTV Inspection

(examples highlighted in yellow)

Step 2: Determine the Use Type for Each Connection

i. Single Family Residential (1 EDU)
ii. Multi-Family Residential (1 EDU for each Residence)
iii. Commercial/Industrial (# of EDU's Per Agency Records)

Step 3: Count the Number of Connections Upstream from the Blockage

i. If a Building is Known to Be Vacant, Do Not Include It

Step 4: Determine the Number of EDUs for each Use Type (Enter into Table A)

Step 5: Determine Duration of the Spill (Difference Between Start Time and End Time)

i. In Table B, Column E, Enter the Time the Spill Was Active for that Time Period
ii. Multiply Column D x Column E and Enter into In Table B, Column F,
iii. Total Column F for all Time Periods

Table A	
Use Type	**EDU**
Single Family Residential	
Multi-Family Residential	
Commercial/Industrial	
Total EDU's	

Table B	Estimated Flow Rate Per EDU (190 gpd)				Spill	
	A	B	C	D	E	F
Time Period	Gallons Per Period	Hours Per Period	A÷B = Gals. Per Hour	C÷60 = Gals. Per Min.	Minutes Spill Was Active	D x E= Gallons Spilled Per Period
6am -Noon	75	6	12.5	.21		
Noon – 6pm	55	6	9.16	.15		
6pm - Midnight	50	6	8.33	.14		
Midnight -6am	10	6	1.67	.03		
Total Estimated Spill Volume per EDU:					(G)	

Table C	Calculation						
Spill Volume/EDU:	Gallons	x	Number of EDU's		=	Estimated Spill Volume	Gallons
(From Cell G)			(From Table A)				

Attachment 8 — Spill Response Evaluation Worksheet

Sewer Spill Response Evaluation Worksheet

Spill Event ID: _____ Spill Event Name: _____

Answer the questions below, in order, beginning with Category 1. When you determine the correct category, check the box to the left)

1. **Notification and Communication Procedures**

   a. Were notification procedures adhered to? ☐ Yes ☐ No

   b. Were notification procedures effective? ☐ Yes ☐ No

2. **Response Procedures**

   a. Were response time goals met? ☐ Yes ☐ No

   b. Were safety procedures adhered to? ☐ Yes ☐ No

   c. Were safety procedures effective? ☐ Yes ☐ No

Sewer Spill Response Evaluation Worksheet

2. Response Procedures

d. Were initial response procedures adhered to? ☐ Yes ☐ No

e. Were initial response procedures effective? ☐ Yes ☐ No

f. Were containment procedures adhered to? ☐ Yes ☐ No

g. Were containment procedures effective? ☐ Yes ☐ No

h. Were clean up and recovery procedures adhered to? ☐ Yes ☐ No

i. Were Sewer Back up procedures adhered to? ☐ Yes ☐ No

j. Were Sewer Back up procedures effective? ☐ Yes ☐ No

k. Were Chain of Custody procedures adhered to? ☐ Yes ☐ No

l. Was Failure Analysis investigation performed and documented? ☐ Yes ☐ No

3. Reporting and Notification Procedures

a. Were reporting and notification timeline requirements met? ☐ Yes ☐ No

4. Documentation

a. Was Spill file created? ☐ Yes ☐ No

b. Was QA/QC performed to ensure field data matched CIWQS data? ☐ Yes ☐ No

Sewer Spill Response Evaluation Worksheet

5. Failure Analysis

c. Was Failure Analysis Performed? ☐ Yes ☐ No

d. Were Any Work Programs Changed as a Result? ☐ Yes ☐ No

Sewer Spill Response Evaluation Worksheet

6. Recommended Changes: ☐ N/A

Attendees:

Facilitated by:

	Date / /

Attachment 9 — Training Record Worksheet

Training Record

Notification and Communication Procedures

Trainer: _____ Trainer Position/Company: _____

Training Location/Environment: _____

Basis for Training & Materials Used:

1.	2.
3.	4.
5.	6.
Comments	
(Basis Examples: SOP, Power Point, Manufacturer's Recommendations, on-the-job-training. Reference Title when applicable)	

Training Description	Attachments: ☐

(Describe in detail what training entailed)

Attachments ☐

Training Method: (Check all that apply)

☐ Classroom/Instructor ☐ Breakout Sessions ☐ Tabletop Exercise ☐ Drill ☐ Hands-on

☐ Coaching/Mentoring ☐ Role Playing ☐ Computerized/on-line Training

☐ Other: _____

Attachments ☐

Training Record

Method to Qualify Trainees: (Check all that apply)

☐ Exam/Quiz ☐ Assessment of Ability ☐ Attendance/Participation

☐ Other: _____

(Maintain Qualifying Records with Training Records)

Trainer Signature: _____ Date: _____/_____/_____

Length of Training (Time) _____ hours

Signature Sheet

Trainee Name (Print)	Signature	Qualified	Qualified By (initials)
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

Training Record

Trainee Name (Print)	Signature	Qualified	Qualified By (initials)
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

Attachment 10 —Cleaning Services Declination Waiver

Cleaning Services Declination Waiver

Customer Name:			
Customer Address:			
Customer Phone:	(H)	(W)	(C)

On (date) _____ at (*time*): _____ approximately _____gallons of (*check one*):

☐ Sewage ☐ Grey Water ☐ Toilet Bowl Water ☐ odor ☐other

Overflowed from/odor emanating from:

☐ Toilet ☐ Shower/Tub ☐ Toilet Bowl Water ☐ Washer ☐other

☐ Other (*specify*): _____

The overflow affected the following area:

☐ Bathroom ☐ Hallway ☐ Kitchen ☐ Wood Flooring ☐Crawlspace

☐ Other (*specify*): _____

The overflow affected the following materials:

☐ Tile ☐ Linoleum ☐ Carpet ☐ Wood Flooring ☐ Area Rugs

☐ Towels ☐ Clothing ☐ Other (*specify*): _____

Photos were/were not taken (*circle one*): _____ # of photos taken.

This Form Completed By: _____ Date & Time: _____

I/We acknowledge that _____(AGENCY) has offered to provide professional cleaning and decontamination services to remediate the sewage backup and/or overflow described above and that I/We declined the offer. I/We further understand and acknowledge that because I/We have declined the AGENCY's offer of assistance, the AGENCY will not be responsible for any necessary remediation activities and will not be responsible for any expenses incurred as a result of this incident.
I/We understand that by signing this form, I/We hereby waive any and all claims I may have against the AGENCY as a result of the sewage backup and/or overflow described above.
The information above was explained to the customer by (*please print*):

Employee Signature: _____ Title: _____

Customer Signature: _____ Date: _____

Attachment 11 —Equipment Inventory and Critical Spare Parts List

Equipment Inventory – Critical Spare Parts List

Agency shall Maintain an inventory of sewer system equipment, including the identification of critical replacement and spare parts.

[1] If an Item can be used at Lift Stations (i.e., pump, portable generator, relay, etc.) list stations that item can be used.

Critical?	Item ID (If Applicable)	Item Description	Manufacturer	Qty	[1] Lift Station Compatibility (List Stations Item Can Be Used)	Storage Location

Attachment 12 —Spill Data and Trends Worksheet

Spill Data and Trends Worksheet

Asset ID	Spill Date	Spill Category	Age	Pipe Material	Dia.	Spill Cause	Cause Location	Repeat Location	Notification Category	Response Time (min)	Response Goal (min)	Response Outcome	Volume Spilled	Volume Recovered	% Recovered	2-Hour Notification Met?

Attachment 13— SPILL RESPONSE FIELD FORM

SPILL RESPONSE FIELD REPORT

NOTIFICATION METHOD

☐ Public Discovery ☐ Employee Discovery ☐ Lift Station Alarm ☐ Contractor Discovery

☐ Other (please list) _____

Time call received_____ ☐ AM ☐ PM Date _____

Address of call: _____ Received by _____

Caller's name_____ Caller's phone _____

Date and time caller noticed the spill ☐ AM ☐ PM

Did you follow the agency's interview script? ☐ Yes ☐ No

Caller's comments:

_____

_____

_____

RESPOND AND ASSESS

First Responder's Name _____

Actively spilling? ☐ Yes ☐ No (if yes, remind customer to stop all water use)

Arrival Time: _____ ☐ AM ☐ PM Photos and Video Taken of Spill Area ☐ Yes ☐ No

Additional Resources Needed? ☐ Yes ☐ No (If Yes, Check All That Apply)

☐ Supervisor ☐ Hydro-Vac ☐ Assistance/Personnel (x _____) ☐ Containment Items

☐ Traffic Control ☐ Electrical/Controls Tech ☐ Mechanical Maintenance/Pump Tech

☐ Other: _____

Resources Requested Time: _____ ☐ AM ☐ PM

Notes: _____

_____

SPILL RESPONSE FIELD REPORT

SPILL CATEGORY

- ☐ **Category 1 –** Any volume that discharges to surface water, or a dry surface water body with no flow, or storm drain system and is not fully captured.
- ☐ **Category 2** – A spill of 1,000 gallons or greater that does not discharge to a surface water.
- ☐ **Category 3 –** A spill of 50 gallons and less than 1,000 gallons that does not discharge to a Surface water.
- ☐ **Category 4 –** A spill of less than 50 gallons that does not discharge to a surface water
- ☐ **Private –** A privately owned sewer system or lateral

If the spill is a category 1 or 2, immediately start your agency notification process. Category 1 and 2 have a 2-hour reporting window after knowledge of the spill.

CONTAINMENT LOCATION (check all that apply):

☐ Curb & Gutter ☐ Street ☐ Open Space ☐ Storm Drain System ☐ Drainage Channel

☐ Inside Building ☐ Lawn/Landscaped Area ☐ Creek/Stream ☐ Wetland

☐ Other: _____

CONTAINMENT METHOD (check all that apply):

☐ Inlet Mats ☐ Sandbags ☐ Dirt Dam/Berm ☐ Rubber Berm ☐ Vacuum Retrieval

☐ Spill Kit ☐ Naturally Contained ☐ Hand Dig Trench ☐ Dry Sweep ☐ Pneumatic Plugs

☐ Divert Sewer System ☐ Absorbent Waddles

☐ Other: _____

CONTAINMENT NOTES

_____

_____

_____

SPILL RESPONSE FIELD REPORT

FAILURE LOCATION

☐ Lower Lateral ☐ Upper Lateral-Private ☐ Gravity Main ☐ Force Main

☐ Lift Station List Asset ID(s): _____

CORRECT CAUSE AND RESTORE FLOW (SELECT ALL THAT APPLY)

☐ Gravity Line Blockage - ☐ Hydro-Vac ☐ Power Rodder ☐ Hand Rods ☐ Excavation ☐ By-Pass

☐ Lift Station - ☐ Electrical ☐ Mechanical ☐ Pull Pump-DeRag ☐ By-Pass ☐ Generator

☐ Force Main - ☐ Hydro-Vac. ☐ By-Pass ☐ Excavation

☐ Lateral - ☐ Cable Machine (EEL) ☐ Hand Rods ☐ Excavation

Description of Actions taken to correct the cause and restore flow:

_____

_____

_____

_____

SPILL CAUSE (select all that apply)

☐ Debris Rags ☐ Root Intrusion ☐ FOG ☐ Non-Dispersables

☐ Lift Station – Electrical ☐ Lift Station Failure-Mechanical ☐ Vandalism

☐ Debris Construction ☐ Pipe / Structural Failure ☐ Natural Disaster

☐ Pipe/ Structural Failure ☐ Capacity Exceeded- I&I ☐ Agency Caused

☐ Other: _____

SPILL RESPONSE FIELD REPORT

SPILL RESPONSE ACTIVITIES (SELECT ALL THAT APPLY)

☐ Mitigated Effects of the Spill ☐ Contained all or Portion of Spill ☐ Restored Flow

☐ CCTV Inspection for Cause ☐ Clean Sewage from Drainage Conveyance

☐ Cleaned Spill Area ☐ Captured and Removed All Washdown Water

☐ Photographs and GPS Locations

Description Of Spill Response Actions

_____

_____

_____

_____

SPILL LOCATION AND SPREAD

Spill Appearance Point:

☐ Building or Structure ☐ Force Main ☐ Gravity Main ☐ Manhole ☐ Agency Cleanout

☐ Private Cleanout ☐ Grease Interceptor ☐ Other: _____

Number of Spill Appearance Points: _____ If multiple points are in a single event, photograph the point closest to the spill origin.

FINAL SPILL DESTINATION (Select All that Apply):

☐ Building ☐ Storm Drain ☐ Drainage System ☐ Paved Surface ☐ Unpaved Surface

☐ Landscaped Area ☐ Street Curb/Gutter ☐ Surface Water

☐ Other: _____

Destination 1: Longitude: _____ Latitude: _____

Destination 2: Longitude: _____ Latitude: _____

Estimated Spill Rate: _____ GPM Method to Determine Spill Rate: _____

SPILL RESPONSE FIELD REPORT

ESTIMATED TRAVEL TIME ☐ N/A

From Point of Entry to Drainage System to Point of Discharge to Receiving Waters: _____ Minutes

- Distance from Spill Point to Storm Drain Conveyance System: _____ Ft ☐ N/A

From Spill Point to Receiving Waters: _____ Minutes

- Distance from Spill Point to Receiving Waters: _____ Ft ☐ N/A

Travel Time Estimation Method: _____

REQUIRED PHOTOS

☐ Spill Appearance Point(s) ☐ Affected Area(s) ☐ Point(s) of Entry Surface Water

☐ Point(s) of Entry to Drainage Conveyance System

If Entered surface water:

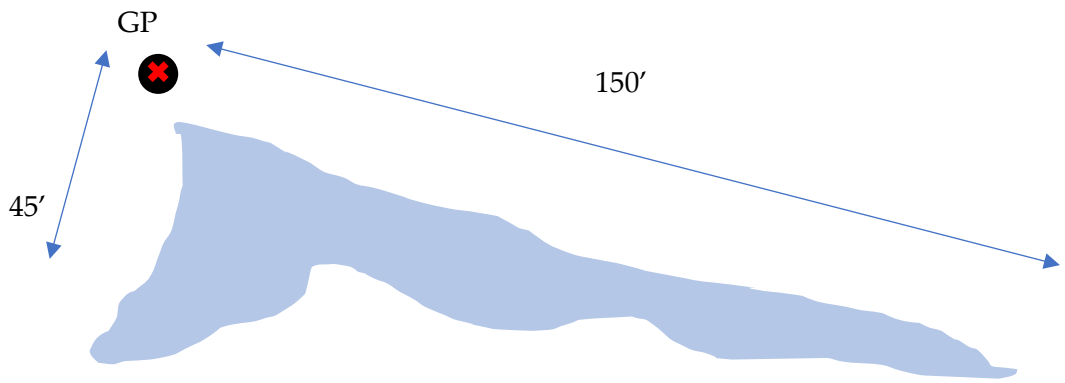
☐ Water Body Bank Erosion ☐ Water Sheen ☐ Floating Matter ☐ Discoloration

SPILL LOCATION AND SPREAD

Sketch the footprint of the spill and provide dimensions (in feet) for size and extent of spill.
Include the Appearance Point, the destination(s) and containment. Indicate where GPS coordinates were taken.

SPILL RESPONSE FIELD REPORT

SPILL LOCATION AND SPREAD EXAMPLE



SPILL RESPONSE FIELD REPORT

SPILL VOLUME ESTIMATIONS

Volume Estimation Method:

☐ Measured Volume ☐ Flow Rate and Duration ☐ Other: _____

☐ Counting Connections ☐ SCADA/ Telemetry Records

Estimated Spill Volume: _____Gallons Estimated Volume Recovered _____Gallons.

Spill Volume Estimation Notes: (List all measurements for spill spread)

_____

_____

_____

_____

_____

_____

_____

_____

_____

Estimate volume that reached a drainage conveyance system flowing to surface water _____Gals.

Estimate volume recovered from drainage conveyance system flowing to surface water _____Gals.

Estimate spill volume discharged directly to surface water (Category 1) _____Gals.

Estimate spill volume recovered from surface water (Category 1) _____Gals.

Estimate spill volume discharged to land _____Gals.

Estimate spill volume recovered from discharge to land _____Gals.

Spill Rate (GPM) _____ Total Spill Volume _____Gals. Total Volume Recovered _____ Gals.

SPILL RESPONSE FIELD REPORT

Contact OES and Obtain Control Number (800) 852-7550

Time Called _____ ☐ AM ☐ PM Control Number _____

Notes: