

August 2013



PUBLIC WORKS DEPARTMENT

SANITARY SEWER OVERFLOW EMERGENCY RESPONSE PLAN

CITY OF BURBANK

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Sanitary Sewer Overflow Emergency Response Plan

1. Introduction

The Public Works Department is responsible for the maintenance of all City of Burbank owned pipelines and appurtenances in the sanitary sewer system. The sanitary sewer system conveys wastewater to the appropriate publicly owned treatment works. Failure at any point within the sanitary sewer system can cause sewage to overflow onto public and/or private property and/or waterways, thereby increasing the risk of a possible public health hazard and contamination of the environment.

This Sanitary Sewer Overflow (SSO) Emergency Response Plan is a tool to be used to assist/train employees to ensure that appropriate action is taken in the event of a sewage overflow.

2. Objectives

The first crew responding to a sewer overflow must protect public health and the environment from the effects of the spilled sewage.

3. Initial Contact Procedures

a. Initial Contact

The initial point of contact – where the City is first notified of a sanitary sewer overflow (SSO) – can vary. The notification route during working hours and non-working hours will be different.

Working Hours

A call received by the City regarding a possible overflow may be received by any City Department. This information is immediately routed to the Public Works Field Office at (818) 238-3800.

After Hours

A call received by the City regarding a possible overflow is typically received either by the Police Department or the Burbank Water and Power (BWP) Guard House. Should the Police receive the call first, they should notify the BWP Guard Shack. The guard shack should immediately notify the Sewer Crew using the pager list contained in this binder.

Any calls from the media should be directed to the Assistant Public Works Director – Wastewater (APWD). If the APWD is not available, media inquiries should be directed to the Public Works Director.

b. Initial Report

Upon the receipt of any complaint the Public Works Field Office will complete a Telephone Inquiry form detailing the location and a description of the discharge. The information will then be immediately forwarded to the Sewer Crew to investigate the sewage spill.

4. Site Assessment

a. Required Response

The Sewer Crew will investigate every reported sewer overflow.

b. Visual Inspection

1) *Unusual Discharge*

If the sewage discharge has an unusual color or odor, the Sewer Crew should contact the Fire Department to alert them of the condition and await their instruction. The Sewer Crew should also contact the BWRP Project Manager to have a sample taken.

2) *No Obvious Sewage Spill*

The Sewer Crew will do a visual inspection of the site and the upstream manholes to determine the nature and potential cause of the problem. The Sewer Crew will contact the reporting party to obtain further information if necessary. If the problem is not sewer related, the site investigation information will be sent to the Public Works Field Office to redirect to the appropriate personnel. The Sewer Crew will complete Sections A and B of the Sewer Response / Overflow Report.

3) *Obvious Spill*

In the case of an obvious sewage spill, the Sewer Crew will follow the Sewer Overflow Response Procedures.

5. Sewage Overflow Response Procedures

a. Site Assessment

The Sewer Crew will assess the site for any immediate hazards or safety concerns. Any immediate threat to the safety of persons is the first priority. Proper traffic control shall be set up before any work is done in the street.

b. Assistance Request

The Sewer Crew will contact the Public Works Field Office for additional assistance if it is needed. The Public Works Field Office will contact the necessary parties for assistance. The following parties may be contacted:

1) *Public Works Engineering Division*

Resource for field direction in unusual circumstances. The Sewer Crew must call engineering if an SSO reaches the channel.

2) *United Water Services*

Trained and ready to assist in helping to reduce flow especially from industrial/commercial/retail users. Can also go door to door upstream of the SSO to inform residents and request cooperation. Any overflow reaching the channel and exceeding 50,000 gallons will require the implementation of a monitoring program.

The BWRP operators should be called anytime plant operations could be affected, or could help reduce the overflow. Also a possible resource for pumps or hoses.

3) *Street Maintenance Crew*

Resource for traffic control equipment or available personnel.

4) *City of Glendale Sewer Department*

A potential resource of additional pumps or other equipment.

c. Clear Blockage

Based on the site assessment, the Sewer Crew will determine the whether the SSO is of sufficient size to focus first on redirection of sewage back into another manhole or clearing the blockage. Except in the event of very large SSOs, the first priority will be to clear the blockage. Where feasible, a trap should be placed in the downstream manhole to capture and identify the cause of the blockage.

d. Containment

The Sewer Crew should immediately redirect the sewage spill back into the sewage collection system. The following steps should be taken:

- Close vehicle/pedestrian traffic through spill areas.
- Place sandbags or other material to reroute the sewage spill into a nearby manhole.
- Block/tarp all storm drain inlets to prevent sewage from entering storm drain system.
- Bypass pumps should be used to divert any sewage flow into a nearby manhole or upstream of a blockage to reduce the flow of the sewage spill.

e. Clean Site

After the sewage at the site has been returned to the sewer system, cleaning of the area must be accomplished.

1) *Possible Pedestrian Contact*

If the overflow occurs in an area where there is potential for pedestrian contact, chlorine should be spread at the location to disinfect the area. Following the placement chlorine, the site must be sprayed down with all washdown water collected by the vacuum truck and returned to the sewer system.¹

2) *Storm Drain System*

If sewage enters the storm drain system, plug the outlet to prevent any sewage from reaching the Burbank Western Channel or Los Angeles River. A vacuum truck should remove the sewage as soon as feasible. Following the removal of sewage, the storm drain should be rinsed down with all washdown water collected by the vacuum truck and returned to the sewer system.¹

6. Notification and Documentation

The Reporting Requirements Flow Chart shall be followed (see Appendix A). The following documentation and notifications must be made:

¹ Model Programs for Stormwater Management Within the County of Los Angeles, Illicit Connection/Illicit Discharge Elimination Program, §D.2.2, March 1999.

- a. Sewer Crew
 - 1) *Sewer Response / Overflow Report Form*
The Public Works Field Crew will complete Sections A and B of the Sewer Response / Overflow Report (see Appendix G).
 - 2) *Receiving Water Samples*
In the event of a 50,000 gallon SSO that reaches the waters of the State, a monitoring program must be implemented in which water quality sampling, at a minimum, must occur for the following constituents:
 - i. Nutrients, including total nitrogen, total phosphorus, and ammonia; and
 - ii. Bacterial indicators, including total and fecal coliform, enterococcus, and e-coli.
 - a. During working hours, the Sewer Crew shall call the Lab Manager, Plant Manager or the Assistant Plant Manager for someone to collect samples.
 - b. After working hours, the Sewer Crew will call the Lab Manager, Plant Manager or the Assistant Plant Manager to collect samples.
- b. Public Works Engineering Division
 - 1) *No SSOs for a Month*
If no SSOs occur in a month, a final certified report must be filed on California Integrated Water Quality System (CIWQS) within 30 days after the end of the month when no SSOs occurred.
 - 2) *Private Lateral SSOs*
If the lateral was from a private lateral, was not caused by a blockage in the public sewer main and did not reach waters of the State, no reporting is necessary.
 - 3) *Public Exposure to SSO*
If the SSO has exposure to the public, the RWQCB must be notified within 24 hours.
 - 4) *SSO that Reaches Water of the State (CAT-1) or is Over 1000 gallons (CAT-2)*
If the SSO reaches the water of the State or is over 1000 gallons, the following actions must be taken:
 - o Call LA County Health (within 2 hours)
 - o Call RWQCB (within 2 hours)
 - o Call Cal OES (within 2 hours)
 - o Report on CIWQS as soon as possible but not later than three businesses days
 - o Send e-mail to RWQCB within 24 hours with verification of Cal OES and DHS contact
 - o Send draft report to CIWQS within 3 business days of the enrollee becoming aware of the SSO by citizen complaint or discovery.
 - o Send final certified report to CIWQS within 15 days of spill. At a minimum, mandatory information shall be reported for a certified Category 1 SSO report, in addition to all fields in section 8.i.a. For a Certified Category 2 SSO report, items 1-14 in section 8.i.a for Draft Category 1 SSO and Items 1-9, and 17 in section 8.i.b above for Certified

Category 1 SSO. See pages 7 and 8 of 11 of Attachment A of the SSS-WDR-MRP. See page 4 of 11 of Attachment A of the SSS-WDR-MRP.

- o Submit final technical report on CIWQS within 45 days (CAT-1) of the SSO end date for any SSO in which 50,000 gallons or greater are spilled to surface waters. See page 5 of 11 of Attachment A of the SSS-WDR-MRP.

5) *SSO Under 1000 gallons and Does Not Reach Waters of the State (CAT-3)*

Although not legally required, call Department of Public Health to report sewer spill. If the SSO is less than 1000 gallons and does not reach the water of the State, a final certified report must be submitted on CIWQS within 30 days after the end of the calendar month when the SSO occurred. At a minimum, the following mandatory information shall be reported for a certified Category 3 SSO report:

1. Items 1-14 in section 8.i.a for Draft Category 1 SSO and Items 1-6, and 17 in section 8.i.b for Certified Category 1 SSO – see pages 7 and 8 of 11 of Attachment A of the SSS-WDR-MRP.

c. Correction/Repair

If the cause of the blockage is determined to be a broken sewer main:

- Bypass pumping should continue as necessary to relieve any flow at the location of the break.
- Traffic control should remain in place to ensure the safety of pedestrians and vehicles.
- If an outside contractor is necessary, the Sewer Crew should call the Public Works Engineering Division to arrange for the repair.
- The Contractor must call an emergency Dig Alert for the repair. The Sewer Crew will delineate the project location.
- If the sewage spill is caused by a blocked or broken sewer lateral, the property owner will be responsible for the repair of the broken lateral.

7. Preparedness

a. Training

The SSO Emergency Response Plan will be distributed to all personnel in the Water Reclamation and Sewer Division. The information contained herein will be reviewed regularly to ensure that staff is appropriately aware of the response procedures.

b. Equipment and Materials

The Sewer Crew should have the following equipment and materials in their vehicles:

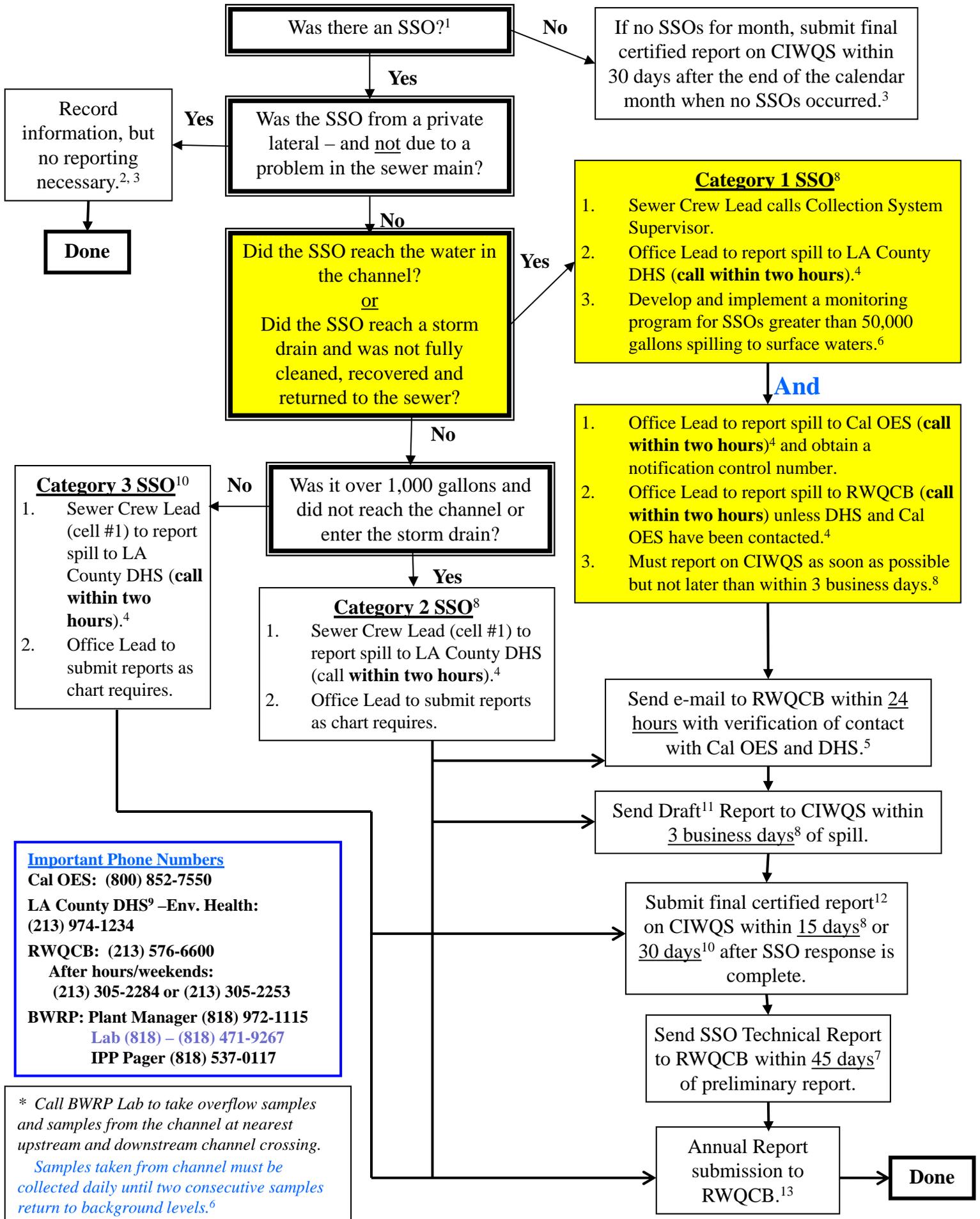
- SSO Emergency Response Plan
- Sewer Response / Overflow Report Forms
- A boom to block catch basins

Appendix A

Reporting Requirements Flowchart

Reporting Requirements for City of Burbank

Includes Compliance with SSS-WDRs and BWRP 2012 NPDES Permits



Important Phone Numbers
 Cal OES: (800) 852-7550
 LA County DHS⁹ –Env. Health: (213) 974-1234
 RWQCB: (213) 576-6600
 After hours/weekends: (213) 305-2284 or (213) 305-2253
 BWRP: Plant Manager (818) 972-1115
 Lab (818) – (818) 471-9267
 IPP Pager (818) 537-0117

* Call BWRP Lab to take overflow samples and samples from the channel at nearest upstream and downstream channel crossing.
 Samples taken from channel must be collected daily until two consecutive samples return to background levels.⁶

Footnotes for SSO Reporting Requirements

¹ **Sanitary sewer overflow (SSO)** - Any overflow, spill, release, discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system. SSOs include:

- (i) Overflows or releases of untreated or partially treated wastewater that reach waters of the United States;
- (ii) Overflows or releases of untreated or partially treated wastewater that do not reach waters of the United States; and
- (iii) Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.

See SSO-WDRs, page 5.

² **Private Lateral Sewage Discharges** – Private Lateral Sewage Discharges – Discharges of untreated or partially treated wastewater resulting from blockages or other problems within a privately owned sewer lateral connected to the enrollee’s sanitary sewer system or from other private sanitary sewer system assets may be voluntarily reported to the CIWQS Online SSO Database.

See State SSS-WDRs-MRP, page 6 of 11.

³ If there are no SSOs during the calendar month, the Enrollee will provide, within 30 days after the end of each calendar month, a statement through the Online SSO Database certifying that there were no SSOs for the designated month.

See State SSS-WDRs-MRP, page 5 of 11.

⁴ In accordance with the requirements of Health and Safety Code section 5411.5, the Discharger shall provide notification to the local health officer or the director of environmental health with jurisdiction over the affected water body of any unauthorized release of sewage or other waste that causes, or probably will cause, a discharge to any waters of the State as soon as possible, but no later than two (2) hours after becoming aware of the release.

See BWRP NPDES Permit, page 38.

In accordance with the requirements of CWC section 13271, the Discharger shall provide notification to the California Office of Emergency Services (Cal OES) of the release of reportable amounts of hazardous substances or sewage that causes, or probably will cause, a discharge to any waters of the State as soon as possible, but not later than two (2) hours after becoming aware of the release. The California Code of Regulations, Title 23, section 2250, defines a reportable amount of sewage as being 1,000 gallons. The phone number for reporting these releases to the Cal OES is (800)852-7550.

See BWRP NPDES Permit, page 38

The Discharger shall notify the Regional Water Board of any unauthorized release of sewage from its POTWs that causes, or probably will cause, a discharge to a water of the State as soon as possible, but not later than two (2) hours after becoming aware of the release. This initial notification does not need to be made if the Discharger has notified Cal EMA and the local health officer or the director of environmental health with jurisdiction over the affected waterbody. The phone number for reporting these releases of sewage to the Regional Water Board is (213) 576-6600. The phone numbers for after hours and weekend reporting of releases of sewage to the Regional Water Board are (213) 305-2284 and (213) 305-2253.

See BWRP NPDES Permit, page 38

At a minimum, the following information shall be provided to the Regional Water Board:

- (i) The location, date, and time of the release.
- (ii) The water body that received or will receive the discharge.
- (iii) An estimate of the amount of sewage or other waste released and the amount that reached a surface water at the time of notification.
- (iv) If ongoing, the estimated flow rate of the release at the time of the notification.
- (v) The name, organization, phone number and email address of the reporting representative.

See BWRP NPDES Permit, page 39

⁵ As soon as possible, but not later than twenty four (24) hours after becoming aware of an unauthorized discharge of sewage or other waste from its wastewater treatment plant to a water of the state, the discharger shall submit a statement to the Regional Water Board by email at VCUEVAS@waterboards.ca.gov. If the discharge is 1,000 gallons or more, this statement shall certify that Cal OES has been notified of the discharge in accordance with CWC section 13271. The statement shall also certify that the local health officer or director of environmental health with jurisdiction over the affected water bodies has been notified of the discharge in accordance with Health and Safety Code section 5411.5. The statement shall also include at a minimum the following information:

- (i) Agency, NPDES No., Order No., and MRP CI No., if applicable.
- (ii) The location, date, and time of the discharge.
- (iii) The water body that received the discharge.
- (iv) A description of the level of treatment of the sewage or other waste discharged.
- (v) An initial estimate of the amount of sewage or other waste released and the amount that reached a surface water.
- (vi) The Cal OES control number and the date and time that notification of the incident was provided to Cal OES.
- (vii) The name of the local health officer or director of environmental health representative notified (if contacted directly); the date and time of notification; and the method of notification (e.g., phone, fax, email).

See BWRP NPDES Permit, page 40.

⁶ To comply with subsection D.7(v) of the SSS WDRs, the enrollee shall develop and implement an SSO Water Quality Monitoring Program to assess impacts from SSOs to surface waters in which 50,000 gallons or greater may have been spilled to surface waters. The SSO Water Quality Monitoring Program, shall, at a minimum:

1. Contain protocols for water quality monitoring.
2. Account for spill travel time in the surface water and scenarios where monitoring may not be possible (e.g., safety, access restrictions, etc.).
3. Require water quality analyses for nutrients and bacterial indicators to be performed by an accredited or certified laboratory.
4. Require monitoring instruments and devices to implement the SSO Water Quality Monitoring Program to be properly maintained and calibrated, including any records to document maintenance and calibration, as necessary to ensure their continued accuracy.
5. Within 48 hours of becoming aware of the SSO, require water quality sampling for, at a minimum, the following constituents:
 - i. Ammonia
 - ii. Appropriate Bacterial indicator(s) per the applicable Basin Plan water quality objective or Regional Board direction which may include total and fecal coliform, enterococcus, and e-coli.

See SSS-WDR-MRP, page 9 of 11.

⁷ SSO Technical Report

The enrollee shall submit and certify a SSO Technical Report in the CIWQS Online SSO Database within 45 calendar days of the SSO end date for any SSO in which 50,000 gallons or greater is spilled to surface waters. This report, which does not preclude the Water Boards from requiring more detailed analyses if requested, shall include at a minimum, the following:

i. Causes and Circumstances of the SSO:

- a. Complete and detailed explanation of how and when the SSO was discovered.
- b. Diagram showing the SSO failure point, appearance point(s), and final destination(s).
- c. Detailed description of the methodology employed and available data used to calculate the volume of the SSO and, if applicable, the SSO volume recovered.
- d. Detailed description of the cause(s) of the SSO.
- e. Copies of original field crew records used to document the SSO.
- f. Historical maintenance records for the failure location.

ii. Enrollee's Response to SSO:

- a. Chronological narrative description of all actions taken by enrollee to terminate the spill.
- b. Explanation of how the SSMP Overflow Emergency Response plan was implemented to respond to and mitigate the SSO.
- c. Final corrective action(s) completed and/or planned to be completed, including a schedule for actions not yet completed.

iii. Water Quality Monitoring:

- a. Description of all water quality sampling activities conducted including analytical results and evaluation of the results.
- b. Detailed location map illustrating all water quality sampling points.

See SSS-WDR-MRP, pages 5 and 6 of 11.

⁸ Category 1 & Category 2 SSOs – All SSOs that meet the above criteria for Category 1 or Category 2 SSOs shall be reported to the CIWQS Online SSO Database:

a. Draft reports for Category 1 & Category 2 SSOs shall be submitted to the CIWQS Online SSO Database within 3 business days of the enrollee becoming aware of the SSO by citizen complaint or discovery. Minimum information that shall be reported in a draft Category 1 SSO report shall include all information identified in section 8.i.a. below. Minimum information that shall be reported in a Category 2 SSO draft report shall include all information identified in section 8.i.c below.

b. A final Category 1 or Category 2 SSO report shall be certified through the CIWQS Online SSO Database within 15 calendar days of the end date of the SSO. Minimum information that shall be certified in the final Category 1 SSO report shall include all information identified in section 8.i.b below. Minimum information that shall be certified in a final Category 2 SSO report shall include all information identified in section 8.i.d below.

See SSS-WDRs-MRP, pages 4 and 5 of 11.

⁹ The Department of Public Health (DPH) has requested that the City of Burbank also report any Category 2 and Category 3 spills to their office. Public Works has informed DPH that we will make every effort to report all sewer spills from public sewer mains to their office.

See Letter from DPH dated January 8, 2008, and letter from the City of Burbank dated February 5, 2008.

¹⁰ Category 3 SSOs – All SSOs that meet the above criteria for Category 3 SSOs shall be reported to the CIWQS Online SSO Database and certified within 30 calendar days after the end of the calendar month in which the SSO occurs (e.g., all Category 3 SSOs occurring in the month of February shall be entered into the database and certified by March 30th). Minimum information that shall be certified in a final Category 3 SSO report shall include all information identified in section 8.i.e below.

See SSS-WDRs-MRP, page 5 of 11.

¹¹ At a minimum, the following mandatory information shall be reported prior to finalizing and certifying an SSO report for each category of SSO:

a. Draft Category 1 SSOs: At a minimum, the following mandatory information shall be reported for a draft Category 1 SSO report:

1. SSO Contact Information: Name and telephone number of enrollee contact person who can answer specific questions about the SSO being reported.
2. SSO Location Name.
3. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field.
4. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure.
5. Whether or not the SSO reached a municipal separate storm drain system.
6. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.
7. Estimate of the SSO volume, inclusive of all discharge point(s).
8. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain.
9. Estimate of the SSO volume recovered (if applicable).
10. Number of SSO appearance point(s).
11. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
12. SSO start date and time.
13. Date and time the enrollee was notified of, or self-discovered, the SSO.
14. Estimated operator arrival time.
15. For spills greater than or equal to 1,000 gallons, the Date and time Cal OES was called.
16. For spills greater than or equal to 1,000 gallons, the Cal OES control number.

Draft Category 2 SSOs: At a minimum, the following mandatory information shall be reported for a draft Category 2 SSO report:

1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO.

See SSS-WDR-MRP, pages 6, 7, and 8 of 11.

¹²Certified Category 1 SSOs: At a minimum, the following mandatory information shall be reported for a certified Category 1 SSO report, in addition to all fields in section 8.i.a :

1. Description of SSO destination(s).
2. SSO end date and time.
3. SSO causes (mainline blockage, roots, etc.).
4. SSO failure point (main, lateral, etc.).
5. Whether or not the spill was associated with a storm event.
6. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the overflow; and a schedule of major milestones for those steps.
7. Description of spill response activities.
8. Spill response completion date.
9. Whether or not there is an ongoing investigation, the reasons for the investigation and the expected date of completion.
10. Whether or not a beach closure occurred or may have occurred as a result of the SSO.
11. Whether or not health warnings were posted as a result of the SSO.
12. Name of beach(es) closed and/or impacted. If no beach was impacted, NA must be selected.
13. Name of surface water(s) impacted.
14. If water quality samples were collected, identify parameters the water quality samples were analyzed for. If no samples were taken, NA shall be selected.

15. If water quality samples were taken, identify which regulatory agencies received sample results (if applicable). If no samples were taken, NA shall be selected.
16. Description of methodology(ies) and type of data relied upon for estimations of the SSO volume discharged and recovered.
17. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Database will issue a final SSO identification (ID) number.

Certified Category 2 SSOs: At a minimum, the following mandatory information shall be reported for a certified Category 2 SSO report:

1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO and Items 1-9, and 17 in section 8.i.b above for Certified Category 1 SSO.

Certified Category 3 SSOs: At a minimum, the following mandatory information shall be reported for a certified Category 3 SSO report:

1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO and Items 1-6, and 17 in section 8.i.b above for Certified Category 1 SSO.

See SSS-WDRs-MRP, pages 7 and 8 of 11.

- ¹³ The Discharger shall include a certification in the annual summary report (due according to the schedule in the MRP) that states—the sewer system emergency equipment, including alarm systems, backup pumps, standby power generators, and other critical emergency pump station components were maintained and tested in accordance with the Discharger’s Preventive Maintenance Plan. Any deviations from or modifications to the Plan shall be discussed.

See BWRP NPDES Permit, page 41.

The Discharger shall develop and maintain a record of all spills, overflows or bypasses of raw or partially treated sewage from its collection system or treatment plant. This record shall be made available to the Regional Water Board upon request and a spill summary shall be included in the annual summary report. The records shall contain:

- a. The date and time of each spill, overflow or bypass;
- b. The location of each spill, overflow or bypass;
- c. The estimated volume of each spill, overflow or bypass including gross volume, amount recovered and amount not recovered, monitoring results as required by section VI.C.6.2;
- d. The cause of each spill, overflow or bypass;
- e. Whether each spill, overflow or bypass entered a receiving water and, if so, the name of the water body and whether it entered via storm drains or other man-made conveyances;
- f. Mitigation measures implemented;
- g. Corrective measures implemented or proposed to be implemented to prevent/minimize future occurrences; and,
- h. The mandatory information included in SSO online reporting for finalizing and certifying the SSO report for each spill, overflow, or bypass under the SSO WDR.

See BWRP NPDES Permit, page 41.

Appendix B

Contact Numbers

Appendix C

***Statewide Waste
Discharge Requirements
for SSOs***

State Water Resources Control Board

July 26, 2013

All Enrollees Subject to the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems

Dear Enrollees:

AMENDMENT OF STATEWIDE MONITORING AND REPORTING PROGRAM (MRP) REQUIREMENTS FOR SANITARY SEWER OVERFLOWS; MRP ORDER 2006-0003-DWQ

Effective September 9, 2013, the MRP for the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Order 2006-0003-DWQ) are amended. The amendments to the MRP set forth in Order 2013-0058-EXEC address compliance and enforceability in the existing MRP. The amendments additionally address stakeholder concern regarding cost of compliance issues. A copy of the amending Order and corresponding Fact Sheet describing my Executive Officer action, are enclosed.

Monitoring and reporting requirements in MRP Order 2008-0002-EXEC that have been effective since 2008 are superseded by the amended requirements set forth in Order 2013-0058-EXEC. If you have any questions regarding these amendments, please contact Russell Norman, Water Resource Control Engineer at (916) 323-5598 or rnorman@waterboards.ca.gov.

Sincerely,



Thomas Howard
Executive Director

Enclosures

cc: Regional Water Quality Control Board Executive Officers

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

The State of California, Water Resources Control Board (hereafter State Water Board) finds:

1. The State Water Board is authorized to prescribe statewide general Waste Discharge Requirements (WDRs) for categories of discharges that involve the same or similar operations and the same or similar types of waste pursuant to Water Code section 13263(i).
2. Water Code section 13193 *et seq.* requires the Regional Water Quality Control Boards (Regional Water Boards) and the State Water Board (collectively, the Water Boards) to gather Sanitary Sewer Overflow (SSO) information and make this information available to the public, including but not limited to, SSO cause, estimated volume, location, date, time, duration, whether or not the SSO reached or may have reached waters of the state, response and corrective action taken, and an enrollee's contact information for each SSO event. An enrollee is defined as the public entity having legal authority over the operation and maintenance of, or capital improvements to, a sanitary sewer system greater than one mile in length.
3. Water Code section 13271, *et seq.* requires notification to the California Office of Emergency Services (Cal OES), formerly the California Emergency Management Agency, for certain unauthorized discharges, including SSOs.
4. On May 2, 2006, the State Water Board adopted Order 2006-0003-DWQ, "Statewide Waste Discharge Requirements for Sanitary Sewer Systems"¹ (hereafter SSS WDRs) to comply with Water Code section 13193 and to establish the framework for the statewide SSO Reduction Program.
5. Subsection G.2 of the SSS WDRs and the Monitoring and Reporting Program (MRP) provide that the Executive Director may modify the terms of the MRP at any time.
6. On February 20, 2008, the State Water Board Executive Director adopted a revised MRP for the SSS WDRs to rectify early notification deficiencies and ensure that first responders are notified in a timely manner of SSOs discharged into waters of the state.
7. When notified of an SSO that reaches a drainage channel or surface water of the state, Cal OES, pursuant to Water Code section 13271(a)(3), forwards the SSO notification information² to local government agencies and first responders including local public health officials and the applicable Regional Water Board. Receipt of notifications for a single SSO event from both the SSO reporter

¹ Available for download at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2006/wqo/wqo2006_0003.pdf

² Cal OES Hazardous Materials Spill Reports available Online at:

[http://w3.calema.ca.gov/operational/mal haz.nsf/\\$defaultview](http://w3.calema.ca.gov/operational/mal haz.nsf/$defaultview) and <http://w3.calema.ca.gov/operational/mal haz.nsf>

and Cal OES is duplicative. To address this, the SSO notification requirements added by the February 20, 2008 MRP revision are being removed in this MRP revision.

8. In the February 28, 2008 Memorandum of Agreement between the State Water Board and the California Water and Environment Association (CWEA), the State Water Board committed to re-designing the CIWQS³ Online SSO Database to allow "event" based SSO reporting versus the original "location" based reporting. Revisions to this MRP and accompanying changes to the CIWQS Online SSO Database will implement this change by allowing for multiple SSO appearance points to be associated with each SSO event caused by a single asset failure.
9. Based on stakeholder input and Water Board staff experience implementing the SSO Reduction Program, SSO categories have been revised in this MRP. In the prior version of the MRP, SSOs have been categorized as Category 1 or Category 2. This MRP implements changes to SSO categories by adding a Category 3 SSO type. This change will improve data management to further assist Water Board staff with evaluation of high threat and low threat SSOs by placing them in unique categories (i.e., Category 1 and Category 3, respectively). This change will also assist enrollees in identifying SSOs that require Cal OES notification.
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 Program⁴ objectives, assess compliance, and enforce the requirements of the SSS WDRs.

IT IS HEREBY ORDERED THAT:

Pursuant to the authority delegated by Water Code section 13267(f), Resolution 2002-0104, and Order 2006-0003-DWQ, the MRP for the SSS WDRs (Order 2006-0003-DWQ) is hereby amended as shown in Attachment A and shall be effective on 07/26/2013.

7/30/13
Date _____


Thomas Howard
Executive Director

³ California Integrated Water Quality System (CIWQS) publicly available at <http://www.waterboards.ca.gov/ciwqs/publicreports.shtml>

⁴ Statewide Sanitary Sewer Overflow Reduction Program information is available at: http://www.waterboards.ca.gov/water_issues/programs/ssso/

ATTACHMENT A

STATE 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

This Monitoring and Reporting Program (MRP) establishes monitoring, record keeping, reporting and public notification requirements for Order 2006-0003-DWQ, "Statewide General Waste Discharge Requirements for Sanitary Sewer Systems" (SSS WDRs). This MRP shall be effective from September 9, 2013 until it is rescinded. The Executive Director may make revisions to this MRP at any time. These revisions may include a reduction or increase in the monitoring and reporting requirements. All site specific records and data developed pursuant to the SSS WDRs and this MRP shall be complete, accurate, and justified by evidence maintained by the enrollee. Failure to comply with this MRP may subject an enrollee to civil liabilities of up to \$5,000 a day per violation pursuant to Water Code section 13350; up to \$1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement. The State Water Resources Control Board (State Water Board) reserves the right to take any further enforcement action authorized by law.

A. SUMMARY OF MRP REQUIREMENTS

Table 1 – Spill Categories and Definitions

CATEGORIES	DEFINITIONS [see Section A on page 5 of Order 2006-0003-DWQ, for Sanitary Sewer Overflow (SSO) definition]
CATEGORY 1	Discharges of untreated or partially treated wastewater of <u>any volume</u> resulting from an enrollee's sanitary sewer system failure or flow condition that: <ul style="list-style-type: none"> • Reach surface water and/or reach a drainage channel tributary to a surface water; or • Reach a Municipal Separate Storm Sewer System (MS4) and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond).
CATEGORY 2	Discharges of untreated or partially treated wastewater of <u>1,000 gallons or greater</u> resulting from an enrollee's sanitary sewer system failure or flow condition that <u>do not</u> reach surface water, a drainage channel, or a MS4 unless the entire SSO discharged to the storm drain system is fully recovered and disposed of properly.
CATEGORY 3	All other discharges of untreated or partially treated wastewater resulting from an enrollee's sanitary sewer system failure or flow condition.
PRIVATE LATERAL SEWAGE DISCHARGE (PLSD)	Discharges of untreated or partially treated wastewater resulting from blockages or other problems <u>within a privately owned sewer lateral</u> connected to the enrollee's sanitary sewer system or from other private sewer assets. PLSDs that the enrollee becomes aware of may be <u>voluntarily</u> reported to the California Integrated Water Quality System (CIWQS) Online SSO Database.

Table 2 – Notification, Reporting, Monitoring, and Record Keeping Requirements

ELEMENT	REQUIREMENT	METHOD
NOTIFICATION (see section B of MRP)	<ul style="list-style-type: none"> • Within two hours of becoming aware of any Category 1 SSO greater than or equal to 1,000 gallons discharged to surface water or spilled in a location where it probably will be discharged to surface water, notify the California Office of Emergency Services (Cal OES) and obtain a notification control number. 	Call Cal OES at: (800) 852-7550
REPORTING (see section C of MRP)	<ul style="list-style-type: none"> • Category 1 SSO: Submit draft report within three business days of becoming aware of the SSO and certify within 15 calendar days of SSO end date. • Category 2 SSO: Submit draft report within 3 business days of becoming aware of the SSO and certify within 15 calendar days of the SSO end date. • Category 3 SSO: Submit certified report within 30 calendar days of the end of month in which SSO the occurred. • SSO Technical Report: Submit within 45 calendar days after the end date of any Category 1 SSO in which 50,000 gallons or greater are spilled to surface waters. • "No Spill" Certification: Certify that no SSOs occurred within 30 calendar days of the end of the month or, if reporting quarterly, the quarter in which no SSOs occurred. • Collection System Questionnaire: Update and certify every 12 months. 	Enter data into the CIWQS Online SSO Database (http://ciwqs.waterboards.ca.gov/), certified by enrollee's Legally Responsible Official(s).
WATER QUALITY MONITORING (see section D of MRP)	<ul style="list-style-type: none"> • Conduct water quality sampling within 48 hours after initial SSO notification for Category 1 SSOs in which 50,000 gallons or greater are spilled to surface waters. 	Water quality results are required to be uploaded into CIWQS for Category 1 SSOs in which 50,000 gallons or greater are spilled to surface waters.
RECORD KEEPING (see section E of MRP)	<ul style="list-style-type: none"> • SSO event records. • Records documenting Sanitary Sewer Management Plan (SSMP) implementation and changes/updates to the SSMP. • Records to document Water Quality Monitoring for SSOs of 50,000 gallons or greater spilled to surface waters. • Collection system telemetry records if relied upon to document and/or estimate SSO Volume. 	Self-maintained records shall be available during inspections or upon request.

B. NOTIFICATION REQUIREMENTS

Although Regional Water Quality Control Boards (Regional Water Boards) and the State Water Board (collectively, the Water Boards) staff do not have duties as first responders, this MRP is an appropriate mechanism to ensure that the agencies that have first responder duties are notified in a timely manner in order to protect public health and beneficial uses.

1. For any Category 1 SSO greater than or equal to 1,000 gallons that results in a discharge to a surface water or spilled in a location where it probably will be discharged to surface water, either directly or by way of a drainage channel or MS4, the enrollee shall, as soon as possible, but not later than two (2) hours after (A) the enrollee has knowledge of the discharge, (B) notification is possible, and (C) notification can be provided without substantially impeding cleanup or other emergency measures, notify the Cal OES and obtain a notification control number.
2. To satisfy notification requirements for each applicable SSO, the enrollee shall provide the information requested by Cal OES before receiving a control number. Spill information requested by Cal OES may include:
 - i. Name of person notifying Cal OES and direct return phone number.
 - ii. Estimated SSO volume discharged (gallons).
 - iii. If ongoing, estimated SSO discharge rate (gallons per minute).
 - iv. SSO Incident Description:
 - a. Brief narrative.
 - b. On-scene point of contact for additional information (name and cell phone number).
 - c. Date and time enrollee became aware of the SSO.
 - d. Name of sanitary sewer system agency causing the SSO.
 - e. SSO cause (if known).
 - v. Indication of whether the SSO has been contained.
 - vi. Indication of whether surface water is impacted.
 - vii. Name of surface water impacted by the SSO, if applicable.
 - viii. Indication of whether a drinking water supply is or may be impacted by the SSO.
 - ix. Any other known SSO impacts.
 - x. SSO incident location (address, city, state, and zip code).
3. Following the initial notification to Cal OES and until such time that an enrollee certifies the SSO report in the CIWQS Online SSO Database, the enrollee shall provide updates to Cal OES regarding substantial changes to the estimated volume of untreated or partially treated sewage discharged and any substantial change(s) to known impact(s).
4. PLSDs: The enrollee is strongly encouraged to notify Cal OES of discharges greater than or equal to 1,000 gallons of untreated or partially treated wastewater that result or may result in a discharge to surface water resulting from failures or flow conditions within a privately owned sewer lateral or from other private sewer asset(s) if the enrollee becomes aware of the PLSD.

C. REPORTING REQUIREMENTS

1. **CIWQS Online SSO Database Account:** All enrollees shall obtain a CIWQS Online SSO Database account and receive a "Username" and "Password" by registering through CIWQS. These accounts allow controlled and secure entry into the CIWQS Online SSO Database.
2. **SSO Mandatory Reporting Information:** For reporting purposes, if one SSO event results in multiple appearance points in a sewer system asset, the enrollee shall complete one SSO report in the CIWQS Online SSO Database which includes the GPS coordinates for the location of the SSO appearance point closest to the failure point, blockage or location of the flow condition that caused the SSO, and provide descriptions of the locations of all other discharge points associated with the SSO event.

3. SSO Categories

- i. **Category 1** – Discharges of untreated or partially treated wastewater of any volume resulting from an enrollee's sanitary sewer system failure or flow condition that:
 - a. Reach surface water and/or reach a drainage channel tributary to a surface water; or
 - b. Reach a MS4 and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond).
- ii. **Category 2** – Discharges of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from an enrollee's sanitary sewer system failure or flow condition that does not reach a surface water, a drainage channel, or the MS4 unless the entire SSO volume discharged to the storm drain system is fully recovered and disposed of properly.
- iii. **Category 3** – All other discharges of untreated or partially treated wastewater resulting from an enrollee's sanitary sewer system failure or flow condition.

4. Sanitary Sewer Overflow Reporting to CIWQS - Timeframes

- i. **Category 1 and Category 2 SSOs** – All SSOs that meet the above criteria for Category 1 or Category 2 SSOs shall be reported to the CIWQS Online SSO Database:
 - a. Draft reports for Category 1 and Category 2 SSOs shall be submitted to the CIWQS Online SSO Database within three (3) business days of the enrollee becoming aware of the SSO. Minimum information that shall be reported in a draft Category 1 SSO report shall include all information identified in section 8.i.a. below. Minimum information that shall be reported in a Category 2 SSO draft report shall include all information identified in section 8.i.c below.
 - b. A final Category 1 or Category 2 SSO report shall be certified through the CIWQS Online SSO Database within 15 calendar days of the end date of the SSO. Minimum information that shall be certified in the final Category 1 SSO report shall include all information identified in section 8.i.b below. Minimum information that shall be certified in a final Category 2 SSO report shall include all information identified in section 8.i.d below.

- ii. **Category 3 SSOs** – All SSOs that meet the above criteria for Category 3 SSOs shall be reported to the CIWQS Online SSO Database and certified within 30 calendar days after the end of the calendar month in which the SSO occurs (e.g., all Category 3 SSOs occurring in the month of February shall be entered into the database and certified by March 30). Minimum information that shall be certified in a final Category 3 SSO report shall include all information identified in section 8.i.e below.
- iii. **“No Spill” Certification** – If there are no SSOs during the calendar month, the enrollee shall either 1) certify, within 30 calendar days after the end of each calendar month, a “No Spill” certification statement in the CIWQS Online SSO Database certifying that there were no SSOs for the designated month, or 2) certify, quarterly within 30 calendar days after the end of each quarter, “No Spill” certification statements in the CIWQS Online SSO Database certifying that there were no SSOs for each month in the quarter being reported on. For quarterly reporting, the quarters are Q1 - January/ February/ March, Q2 - April/May/June, Q3 - July/August/September, and Q4 - October/November/December.

If there are no SSOs during a calendar month but the enrollee reported a PLSD, the enrollee shall still certify a “No Spill” certification statement for that month.
- iv. **Amended SSO Reports** – The enrollee may update or add additional information to a certified SSO report within 120 calendar days after the SSO end date by amending the report or by adding an attachment to the SSO report in the CIWQS Online SSO Database. SSO reports certified in the CIWQS Online SSO Database prior to the adoption date of this MRP may only be amended up to 120 days after the effective date of this MRP. After 120 days, the enrollee may contact the SSO Program Manager to request to amend an SSO report if the enrollee also submits justification for why the additional information was not available prior to the end of the 120 days.

5. **SSO Technical Report**

The enrollee shall submit an SSO Technical Report in the CIWQS Online SSO Database within 45 calendar days of the SSO end date for any SSO in which 50,000 gallons or greater are spilled to surface waters. This report, which does not preclude the Water Boards from requiring more detailed analyses if requested, shall include at a minimum, the following:

- i. **Causes and Circumstances of the SSO:**
 - a. Complete and detailed explanation of how and when the SSO was discovered.
 - b. Diagram showing the SSO failure point, appearance point(s), and final destination(s).
 - c. Detailed description of the methodology employed and available data used to calculate the volume of the SSO and, if applicable, the SSO volume recovered.
 - d. Detailed description of the cause(s) of the SSO.
 - e. Copies of original field crew records used to document the SSO.
 - f. Historical maintenance records for the failure location.
- ii. **Enrollee’s Response to SSO:**
 - a. Chronological narrative description of all actions taken by enrollee to terminate the spill.
 - b. Explanation of how the SSMP Overflow Emergency Response plan was implemented to respond to and mitigate the SSO.

- c. Final corrective action(s) completed and/or planned to be completed, including a schedule for actions not yet completed.

iii. **Water Quality Monitoring:**

- a. Description of all water quality sampling activities conducted including analytical results and evaluation of the results.
- b. Detailed location map illustrating all water quality sampling points.

6. **PLSDs**

Discharges of untreated or partially treated wastewater resulting from blockages or other problems within a privately owned sewer lateral connected to the enrollee's sanitary sewer system or from other private sanitary sewer system assets may be voluntarily reported to the CIWQS Online SSO Database.

- i. The enrollee is also encouraged to provide notification to Cal OES per section B above when a PLSD greater than or equal to 1,000 gallons has or may result in a discharge to surface water. For any PLSD greater than or equal to 1,000 gallons regardless of the spill destination, the enrollee is also encouraged to file a spill report as required by Health and Safety Code section 5410 et. seq. and Water Code section 13271, or notify the responsible party that notification and reporting should be completed as specified above and required by State law.
- ii. If a PLSD is recorded in the CIWQS Online SSO Database, the enrollee must identify the sewage discharge as occurring and caused by a private sanitary sewer system asset and should identify a responsible party (other than the enrollee), if known. Certification of PLSD reports by enrollees is not required.

7. **CIWQS Online SSO Database Unavailability**

In the event that the CIWQS Online SSO Database is not available, the enrollee must fax or e-mail all required information to the appropriate Regional Water Board office in accordance with the time schedules identified herein. In such event, the enrollee must also enter all required information into the CIWQS Online SSO Database when the database becomes available.

8. **Mandatory Information to be Included in CIWQS Online SSO Reporting**

All enrollees shall obtain a CIWQS Online SSO Database account and receive a "Username" and "Password" by registering through CIWQS which can be reached at CIWQS@waterboards.ca.gov or by calling (866) 792-4977, M-F, 8 A.M. to 5 P.M. These accounts will allow controlled and secure entry into the CIWQS Online SSO Database. Additionally, within thirty (30) days of initial enrollment and prior to recording SSOs into the CIWQS Online SSO Database, all enrollees must complete a Collection System Questionnaire (Questionnaire). The Questionnaire shall be updated at least once every 12 months.

i. **SSO Reports**

At a minimum, the following mandatory information shall be reported prior to finalizing and certifying an SSO report for each category of SSO:

- a. **Draft Category 1 SSOs**: At a minimum, the following mandatory information shall be reported for a draft Category 1 SSO report:
1. SSO Contact Information: Name and telephone number of enrollee contact person who can answer specific questions about the SSO being reported.
 2. SSO Location Name.
 3. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field.
 4. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure.
 5. Whether or not the SSO reached a municipal separate storm drain system.
 6. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.
 7. Estimate of the SSO volume, inclusive of all discharge point(s).
 8. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain.
 9. Estimate of the SSO volume recovered (if applicable).
 10. Number of SSO appearance point(s).
 11. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
 12. SSO start date and time.
 13. Date and time the enrollee was notified of, or self-discovered, the SSO.
 14. Estimated operator arrival time.
 15. For spills greater than or equal to 1,000 gallons, the date and time Cal OES was called.
 16. For spills greater than or equal to 1,000 gallons, the Cal OES control number.
- b. **Certified Category 1 SSOs**: At a minimum, the following mandatory information shall be reported for a certified Category 1 SSO report, in addition to all fields in section 8.i.a :
1. Description of SSO destination(s).
 2. SSO end date and time.
 3. SSO causes (mainline blockage, roots, etc.).
 4. SSO failure point (main, lateral, etc.).
 5. Whether or not the spill was associated with a storm event.
 6. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the overflow; and a schedule of major milestones for those steps.
 7. Description of spill response activities.
 8. Spill response completion date.
 9. Whether or not there is an ongoing investigation, the reasons for the investigation and the expected date of completion.

10. Whether or not a beach closure occurred or may have occurred as a result of the SSO.
 11. Whether or not health warnings were posted as a result of the SSO.
 12. Name of beach(es) closed and/or impacted. If no beach was impacted, NA shall be selected.
 13. Name of surface water(s) impacted.
 14. If water quality samples were collected, identify parameters the water quality samples were analyzed for. If no samples were taken, NA shall be selected.
 15. If water quality samples were taken, identify which regulatory agencies received sample results (if applicable). If no samples were taken, NA shall be selected.
 16. Description of methodology(ies) and type of data relied upon for estimations of the SSO volume discharged and recovered.
 17. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Database will issue a final SSO identification (ID) number.
- c. **Draft Category 2 SSOs**: At a minimum, the following mandatory information shall be reported for a draft Category 2 SSO report:
1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO.
- d. **Certified Category 2 SSOs**: At a minimum, the following mandatory information shall be reported for a certified Category 2 SSO report:
1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO and Items 1-9, and 17 in section 8.i.b above for Certified Category 1 SSO.
- e. **Certified Category 3 SSOs**: At a minimum, the following mandatory information shall be reported for a certified Category 3 SSO report:
1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO and Items 1-6, and 17 in section 8.i.b above for Certified Category 1 SSO.
- ii. **Reporting SSOs to Other Regulatory Agencies**
- These reporting requirements do not preclude an enrollee from reporting SSOs to other regulatory agencies pursuant to state law. In addition, these reporting requirements do not replace other Regional Water Board notification and reporting requirements for SSOs.
- iii. **Collection System Questionnaire**
- The required Questionnaire (see subsection G of the SSS WDRs) provides the Water Boards with site-specific information related to the enrollee's sanitary sewer system. The enrollee shall complete and certify the Questionnaire at least every 12 months to facilitate program implementation, compliance assessment, and enforcement response.
- iv. **SSMP Availability**
- The enrollee shall provide the publicly available internet web site address to the CIWQS Online SSO Database where a downloadable copy of the enrollee's approved SSMP, critical supporting documents referenced in the SSMP, and proof of local governing board approval of the SSMP is posted. If all of the SSMP documentation listed in this subsection is not publicly available on the Internet, the enrollee shall comply with the following procedure:

- a. Submit an **electronic** copy of the enrollee's approved SSMP, critical supporting documents referenced in the SSMP, and proof of local governing board approval of the SSMP to the State Water Board, within 30 days of that approval and within 30 days of any subsequent SSMP re-certifications, to the following mailing address:

State Water Resources Control Board
Division of Water Quality
Attn: SSO Program Manager
1001 I Street, 15th Floor, Sacramento, CA 95814

D. WATER QUALITY MONITORING REQUIREMENTS:

To comply with subsection D.7(v) of the SSS WDRs, the enrollee shall develop and implement an SSO Water Quality Monitoring Program to assess impacts from SSOs to surface waters in which 50,000 gallons or greater are spilled to surface waters. The SSO Water Quality Monitoring Program, shall, at a minimum:

1. Contain protocols for water quality monitoring.
2. Account for spill travel time in the surface water and scenarios where monitoring may not be possible (e.g. safety, access restrictions, etc.).
3. Require water quality analyses for ammonia and bacterial indicators to be performed by an accredited or certified laboratory.
4. Require monitoring instruments and devices used to implement the SSO Water Quality Monitoring Program to be properly maintained and calibrated, including any records to document maintenance and calibration, as necessary, to ensure their continued accuracy.
5. Within 48 hours of the enrollee becoming aware of the SSO, require water quality sampling for, at a minimum, the following constituents:
 - i. Ammonia
 - ii. Appropriate Bacterial indicator(s) per the applicable Basin Plan water quality objective or Regional Board direction which may include total and fecal coliform, enterococcus, and e-coli.

E. RECORD KEEPING REQUIREMENTS:

The following records shall be maintained by the enrollee for a minimum of five (5) years and shall be made available for review by the Water Boards during an onsite inspection or through an information request:

1. General Records: The enrollee shall maintain records to document compliance with all provisions of the SSS WDRs and this MRP for each sanitary sewer system owned including any required records generated by an enrollee's sanitary sewer system contractor(s).
2. SSO Records: The enrollee shall maintain records for each SSO event, including but not limited to:
 - i. Complaint records documenting how the enrollee responded to all notifications of possible or actual SSOs, both during and after business hours, including complaints that do not

result in SSOs. Each complaint record shall, at a minimum, include the following information:

- a. Date, time, and method of notification.
 - b. Date and time the complainant or informant first noticed the SSO.
 - c. Narrative description of the complaint, including any information the caller can provide regarding whether or not the complainant or informant reporting the potential SSO knows if the SSO has reached surface waters, drainage channels or storm drains.
 - d. Follow-up return contact information for complainant or informant for each complaint received, if not reported anonymously.
 - e. Final resolution of the complaint.
- ii. Records documenting steps and/or remedial actions undertaken by enrollee, using all available information, to comply with section D.7 of the SSS WDRs.
 - iii. Records documenting how all estimate(s) of volume(s) discharged and, if applicable, volume(s) recovered were calculated.
3. Records documenting all changes made to the SSMP since its last certification indicating when a subsection(s) of the SSMP was changed and/or updated and who authorized the change or update. These records shall be attached to the SSMP.
 4. Electronic monitoring records relied upon for documenting SSO events and/or estimating the SSO volume discharged, including, but not limited to records from:
 - i. Supervisory Control and Data Acquisition (SCADA) systems
 - ii. Alarm system(s)
 - iii. Flow monitoring device(s) or other instrument(s) used to estimate wastewater levels, flow rates and/or volumes.

F. CERTIFICATION

1. All information required to be reported into the CIWQS Online SSO Database shall be certified by a person designated as described in subsection J of the SSS WDRs. This designated person is also known as a Legally Responsible Official (LRO). An enrollee may have more than one LRO.
2. Any designated person (i.e. an LRO) shall be registered with the State Water Board to certify reports in accordance with the CIWQS protocols for reporting.
3. Data Submitter (DS): Any enrollee employee or contractor may enter draft data into the CIWQS Online SSO Database on behalf of the enrollee if authorized by the LRO and registered with the State Water Board. However, only LROs may certify reports in CIWQS.
4. The enrollee shall maintain continuous coverage by an LRO. Any change of a registered LRO or DS (e.g., retired staff), including deactivation or a change to the LRO's or DS's contact information, shall be submitted by the enrollee to the State Water Board within 30 days of the change by calling (866) 792-4977 or e-mailing help@ciwqs.waterboards.ca.gov.

5. A registered designated person (i.e., an LRO) shall certify all required reports under penalty of perjury laws of the state as stated in the CIWQS Online SSO Database at the time of certification.

CERTIFICATION

The undersigned Clerk to the Board does hereby certify that the foregoing is a full, true, and correct copy of an order amended by the Executive Director of the State Water Resources Control Board.

7/30/13

Date



Jeanine Townsend
Clerk to the Board



Fact Sheet

STATE WATER RESOURCES CONTROL BOARD | 1001 I Street, Sacramento, CA 95814 | Mailing Address: P. O. Box 700, Sacramento, CA 95812-0100 | www.waterboards.ca.gov

AMENDED MONITORING AND REPORTING PROGRAM FOR THE STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

BACKGROUND

Water Code section 13193 (2001, A.B. 285) requires the State Water Resources Control Board (State Water Board) and Regional Water Quality Control Boards (collectively Water Boards) to gather comprehensive and specific Sanitary Sewer Overflow (SSO) information. Water Code section 13193 also requires the Water Boards to make available to the public information including but not limited to the cause, estimated volume, location, date, time, and duration of the SSO; whether the SSO reached or may have reached surface waters; the response and corrective action taken by the collection system owner or operator (hereafter, Enrollee) for each SSO event; and the contact information for each Enrollee.

On May 2, 2006 the State Water Board adopted Water Quality Order 2006-0003-DWQ, "Statewide Waste Discharge Requirements for Sanitary Sewer Systems" (hereafter, SSS WDRs) to address Water Code section 13193 requirements and develop the framework for the statewide Sanitary Sewer Overflow Reduction Program. The SSS WDRs' Monitoring and Reporting Program (MRP) includes specific SSO notification and reporting and record keeping requirements to meet SSO reporting requirements in the Water Code and facilitate compliance monitoring and enforcement for violations.

The State Water Board Executive Officer issued a revised MRP for the SSS WDRs on February 20, 2008 to rectify notification deficiencies that occurred early in program implementation and to ensure that first responders (e.g., Water Boards, California Office of Emergency Services, and County Health Departments) are notified in a timely manner for SSOs discharged to surface waters. Based on over six years of implementation of the SSS WDRs, the State Water Board concluded that the February 20, 2008 revised MRP is no longer adequate to advance the Sanitary Sewer Overflow Reduction Program objectives, assess compliance, and enforce the requirements of the SSS WDRs.

Following its January 24, 2012 workshop with stakeholders for the review and update of the SSS WDRs, the State Water Board directed staff to review and evaluate the existing monitoring and reporting requirements and prepare an amended MRP for the Executive Director's issuance. Staff worked with the key stakeholders (e.g., California Association of Sanitation Agencies) to revise the monitoring and reporting requirements. State Water Board staff distributed the draft versions of the MRP to all stakeholders registered on the Lyris e-mail list for the Sanitary Sewer Overflow Reduction Program, solicited comments on the draft versions of the MRP in January and March 2013, and considered all comments received in developing the final revised MRP.

INSPECTION AND AUDIT FINDINGS

Since January 2007, numerous violations of the SSS WDRs have been documented by the Water Boards through data review, compliance monitoring, and onsite inspections. The most common violations related to the MRP that the Water Boards have documented are:

- Failure to properly estimate and report SSO volumes discharged and recovered [violation of section G of the SSS WDRs]
- Failure of the Enrollee to comply with all minimum MRP record keeping requirements [violation of section G of the SSS WDRs]
- Failure of the Enrollee to implement feasible alternatives and actions necessary to identify and correct problems causing SSOs [violation of subsection D.6 of the SSS WDRs]
- Unauthorized use of legally responsible official's SSO Online Database login password and electronic signature; [violation of section J of the SSS WDRs]
- Failure of the Enrollee to develop and/or implement an Overflow Emergency Response Plan to ensure all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including accelerated or additional monitoring necessary to determine the nature and impact of the SSO [violation of subsection D.13(vi) of the SSS WDRs]
- Failure of the Enrollee to implement required training for sewer system operators and contractors [violation of subsections D.13(iv) and D.13(vi) of the SSS WDRs]

Amendments made to the MRP in Order 2013-0058-EXEC address these and other issues that have become apparent in the implementation of the SSS WDRs in over six years.

MONITORING AND REPORTING PROGRAM AMENDMENTS

State Water Board staff and other members of the Data Review Committee reviewed the current SSS WDRs reporting requirements as part of the SSS WDRs review and update process. The Data Review Committee is open to all stakeholders. Consequently, enrollees, non-governmental organizations, and other agencies have participated. As a result of this process, new reporting requirements have been developed that address the compliance and enforcement issues noted above and improve the quality and usefulness of SSO data collected.

While the proposed changes streamline the reporting process overall, some fields have been added to the reports. These additions address critical information gaps in the current reporting that have been identified both internally and by stakeholders.

For example, many enrollees have noted that we need to be able to separate sewer lateral spills from spills occurring in other asset types like main lines or pump stations. The "where did the failure occur" question on the electronic spill report form was not a required field in the original or revised 2008 MRP. Many SSO reports do not have this information, thus, we cannot differentiate lateral spills from main line, pump station, or other types of spills. This is one example of the additions in the required data entry that have been addressed in the 2013 MRP revisions.

The following is a summary of major changes made to the existing MRP (Order 2008-0002-EXEC) and incorporated in the final revised MRP (Order 2013-0058-EXEC):

1. Change in Notification Requirement for spills that reach surface water:

- Three notification calls were required (California Office of Emergency Services, Regional Water Quality Control Boards, and local Health Departments). Required notification has been changed to call California Office of Emergency Services (Cal OES) only since Cal OES notifies the Regional Water Quality Control Boards and local Health Departments when a spill notification is received.
- Elimination of requirement to submit a certification to Regional Water Quality Control Boards within 24 hours of making notification calls.
- Alignment of notification requirement with California Code of Regulations section 2250, Reportable Quantity of Sewage, by requiring notification calls for only spills of 1,000 gallons or more. Notification of Cal OES was required for all spills to surface water.
- Addition of requirement to update Cal OES when there are substantial changes to previously reported spill volume estimates or impacts.

2. Defined new spill categories and refined spill report fields:

- Replacement of spill Categories 1 and 2 with Categories 1, 2, and 3. Spills are now classified as follows:
 - Category 1 – Spills of any volume that reach surface water
 - Category 2 – Spills greater than or equal to 1,000 gallons that do not reach surface water
 - Category 3 (formerly Category 2) – Spills less than 1,000 gallons that do not reach surface water

All spills to surface water will be in a distinct category with this change. Spill reporting fields were refined and streamlined with stakeholder input.

3. Addition of requirement to submit a technical report within 45 days of the end date for spills to surface water over 50,000 gallons.
4. Addition of requirement for all Permit enrollees to develop a Water Quality Monitoring plan to be implemented within 48 hours after initial notification for spills where 50,000 gallons or more reach surface water.
5. Addition of requirement for Permit enrollees to submit an electronic copy of their Sewer System Management Plan (SSMP) or provide the web address where their SSMP is posted.
6. Addition of enhanced record keeping requirements.
7. Elimination of requirement to certify Private Lateral Sewer Discharge reports.
8. Addition of a 120-day time limit for amending and re-certifying spill reports.

Appendix D

***2006 BWRP NPDES
Permit Requirements
for SSOs***



6. Spill Reporting Requirements

1. Initial Notification

Although State and Regional Water Board staff do not have duties as first responders, this requirement is an appropriate mechanism to ensure that the agencies that do have first responder duties are notified in a timely manner in order to protect public health and beneficial uses. For certain spills, overflows and bypasses, the Discharger shall make notifications as required below:

- a. In accordance with the requirements of Health and Safety Code section 5411.5, the Discharger shall provide notification to the local health officer or the director of environmental health with jurisdiction over the affected water body of any unauthorized release of sewage or other waste that causes, or probably will cause, a discharge to any waters of the State as soon as possible, but no later than two (2) hours after becoming aware of the release.
- b. In accordance with the requirements of CWC section 13271, the Discharger shall provide notification to the California Emergency Management Agency (Cal EMA) of the release of reportable amounts of hazardous substances or sewage that causes, or probably will cause, a discharge to any waters of the State as soon as possible, but not later than two (2) hours after becoming aware of the release. The California Code of Regulations, Title 23, section 2250, defines a reportable amount of sewage as being 1,000 gallons. The phone number for reporting these releases to the Cal EMA is (800)852-7550.
- c. The Discharger shall notify the Regional Water Board of any unauthorized release of sewage from its POTWs that causes, or probably will cause, a discharge to a water of the State as soon as possible, but not later than **two (2)** hours after becoming aware of the release. This initial notification does

not need to be made if the Discharger has notified Cal EMA and the local health officer or the director of environmental health with jurisdiction over the affected waterbody. The phone number for reporting these releases of sewage to the Regional Water Board is (213) 576-6657. The phone numbers for after hours and weekend reporting of releases of sewage to the Regional Water Board are (213) 305-2284 and (213) 305-2253.

At a minimum, the following information shall be provided to the Regional Water Board:

- (i) The location, date, and time of the release.
- (ii) The water body that received or will receive the discharge.
- (iii) An estimate of the amount of sewage or other waste released and the amount that reached a surface water at the time of notification.
- (iv) If ongoing, the estimated flow rate of the release at the time of the notification.
- (v) The name, organization, phone number and email address of the reporting representative.

2. Monitoring

For spills, overflows and bypasses reported under section VI.C.6.1.c., the Discharger shall monitor as required below:

- a. To define the geographical extent of spill's impact the Discharger shall obtain grab samples (if feasible, accessible, and safe) for spills, overflows or bypasses of any volume that reach receiving waters. The Discharger shall analyze the samples for total and fecal coliforms or E. coli, and enterococcus, and relevant pollutants of concern, upstream and downstream of the point of entry of the spill (if feasible, accessible and safe). This monitoring shall be done on a daily basis from time the spill is known until the results of two consecutive sets of bacteriological monitoring indicate the return to the background level or the County Department of Public Health authorizes cessation of monitoring.
- b. The Discharger shall obtain a grab sample (if feasible, accessible, and safe) for spills, overflows or bypasses of any volume that flowed to receiving waters, entered a shallow ground water aquifer, or have the potential for public exposure; and for all spills, overflows or bypasses of 1,000 gallons or more. The Discharger shall characterize the sample for total and fecal coliforms or E. coli, and enterococcus, and analyze relevant pollutants of concern depending on the area and nature of spills or overflows if feasible, accessible and safe.

3. Reporting

The Regional Water Board initial notification required under section VI.C.6.1.a. shall be followed by:

- a. As soon as possible, but **not later than twenty four (24) hours** after becoming aware of an unauthorized discharge of sewage or other waste from its wastewater treatment plant to a water of the state, the discharger shall submit a statement to the Regional Water Board by email at aanijielo@waterboards.ca.gov . If the discharge is 1,000 gallons or more, this statement shall certify that Cal EMA has been notified of the discharge in accordance with CWC section 13271. The statement shall also certify that the local health officer or director of environmental health with jurisdiction over the affected water bodies has been notified of the discharge in accordance with Health and Safety Code section 5411.5. The statement shall also include at a minimum the following information:
 - (i) Agency, NPDES No., Order No., and MRP CI No., if applicable.
 - (ii) The location, date, and time of the discharge.
 - (iii) The water body that received the discharge.
 - (iv) A description of the level of treatment of the sewage or other waste discharged.
 - (v) An initial estimate of the amount of sewage or other waste released and the amount that reached a surface water.
 - (vi) The Cal EMA control number and the date and time that notification of the incident was provided to Cal EMA.
 - (vii) The name of the local health officer or director of environmental health representative notified (if contacted directly); the date and time of notification; and the method of notification (e.g., phone, fax, email).
- b. A written preliminary report five working days after disclosure of the incident (submission to the Regional Water Board of the California Integrated Water Quality System (CIWQS) Sanitary Sewer Overflow (SSO) event number shall satisfy this requirement). Within 30 days after submitting the preliminary report, the Discharger shall submit the final written report to this Regional Water Board. (A copy of the final written report, for a given incident, already submitted pursuant to a Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies, may be submitted to the Regional Water Board to satisfy this requirement.) The written report shall document the information required in paragraph D below, monitoring results and any other information required in provisions of the Standard Provisions document including corrective measures implemented or proposed to be

implemented to prevent/minimize future occurrences. The Executive Officer for just cause can grant an extension for submittal of the final written report.

- c. The Discharger shall include a certification in the annual summary report (due according to the schedule in the MRP) that states—the sewer system emergency equipment, including alarm systems, backup pumps, standby power generators, and other critical emergency pump station components were maintained and tested in accordance with the Discharger’s Preventive Maintenance Plan. Any deviations from or modifications to the Plan shall be discussed.

4. Records

The Discharger shall develop and maintain a record of all spills, overflows or bypasses of raw or partially treated sewage from its collection system or treatment plant. This record shall be made available to the Regional Water Board upon request and a spill summary shall be included in the annual summary report. The records shall contain:

- a. The date and time of each spill, overflow or bypass;
- b. The location of each spill, overflow or bypass;
- c. The estimated volume of each spill, overflow or bypass including gross volume, amount recovered and amount not recovered, monitoring results as required by section VI.C.6.2;
- d. The cause of each spill, overflow or bypass;
- e. Whether each spill, overflow or bypass entered a receiving water and, if so, the name of the water body and whether it entered via storm drains or other man-made conveyances;
- f. Mitigation measures implemented;
- g. Corrective measures implemented or proposed to be implemented to prevent/minimize future occurrences; and,
- h. The mandatory information included in SSO online reporting for finalizing and certifying the SSO report for each spill, overflow, or bypass under the SSO WDR.

5. Activities Coordination

In addition, Regional Water Board expects that the POTW’s owners/operators will coordinate their compliance activities for consistency and efficiency with other entities that have responsibilities to implement: (i) this NPDES permit, including

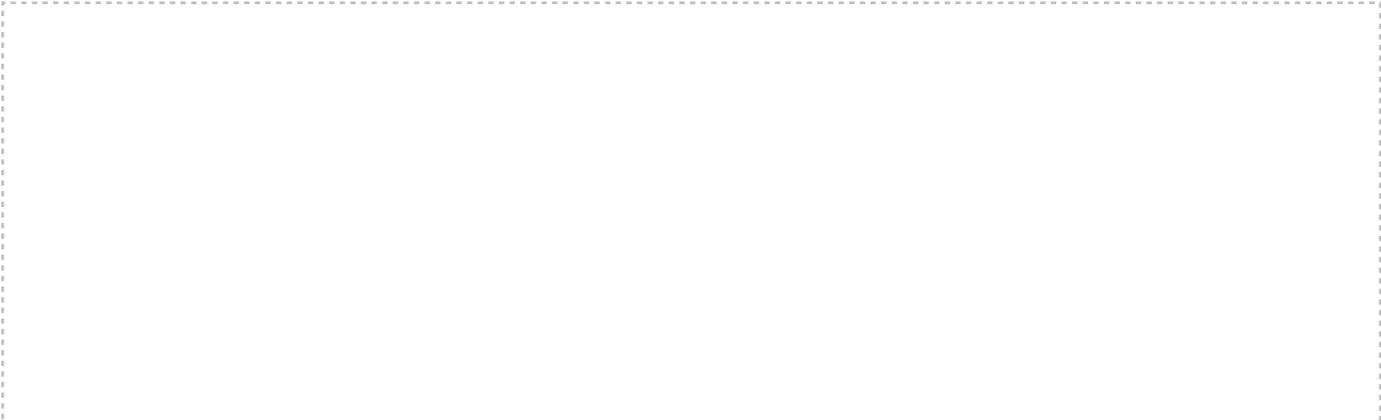
the Pretreatment Program, (ii) a MS4 NPDES permit that may contain spill prevention, sewer maintenance, reporting requirements and (iii) the SSO WDR.

6. Consistency with Sanitary Sewer Overflows WDRs

The Clean Water Act prohibits the discharge of pollutants from point sources to surface waters of the United States unless authorized under an NPDES permit. (33 U.S.C. §§1311, 1342). The State Water Board adopted General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems, (WQ Order No. 2006-0003) on May 2, 2006, to provide a consistent, statewide regulatory approach to address Sanitary Sewer Overflows (SSOs). The SSOs WDR requires public agencies that own or operate sanitary sewer systems to develop and implement sewer system management plans and report all SSOs to the State Water Board's online SSOs database.

The requirements contained in this Order in sections VI.C.3.b. (Spill Contingency Plan Section), VI.C.4. (Construction, Operation and Maintenance Specifications Section), and VI.C.6. (Spill Reporting Requirements) are intended to be consistent with the requirements of the SSOs WDR. The Regional Water Board recognizes that there may be some overlap between the NPDES permit provisions and SSOs WDR requirements, at least as related to the collection systems. The requirements of the SSOs WDR are considered the minimum thresholds (see Finding 11 of State Board Order No. 2006-0003-DWQ). To encourage efficiency, the Regional Water Board will accept the documentation prepared by the Permittees under the SSOs WDR for compliance purposes, as satisfying the requirements in sections VI.C.3.b., VI.C.4., and VI.C.6. provided the monitoring requirements contained in this Order in sections IV.9.B.d. and IV.9.B.e. are also addressed. Pursuant to the SSO WDR, State Board Order No. 2006-0003-DWQ, section D., provision 2.(iii) and (iv), the provisions of this NPDES permit supercede the SSO WDR, for all purposes, including enforcement, to the extent the requirements may be deemed duplicative.

- 7. The Discharger shall provide standby or emergency power facilities and/or storage capacity or other means so that in the event of plant upset or outage due to power failure or other cause, discharge of raw or inadequately treated sewage does not occur.



Appendix E

Bypass Procedures for the Burbank Water Reclamation Plant

Appendix F

Bypass Procedures for the Riverside Area & the Beachwood Pump Station

Appendix G

***Sewer Response /
Overflow Report***

City of Burbank, Public Works Department

Response/Overflow Report

County Health Ticket #:	Time of Call: AM PM	Date:
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Instruction: Section A, B&C for response crew use, Section D&E for office staff use.

Section A:

Received by:	Date:	Time: AM PM
Caller's Name:	Phone No.:	Address:
Location of the complaint:	Cross St:	
Date and time the enrollee was notified of, or self-discovered, the overflow:		AM PM
Description of complaint:		

Section B: Field Response Report

(For Response Crew Use)		
Crew member name:	Time arrived:	AM PM
Crew member name:	Time arrived:	AM PM
Crew member name:	Time arrived:	AM PM
Crew member name:	Time arrived:	AM PM
Upstream MH No.:	Downstream MH No.:	
Diameter of line:	Length of the line:	
Was there a blockage in the public main? If yes, in the (circle one) street or easement. If no, explain situation.		
Obstruction location:	Cause of obstruction:	
Observations at site:		
Remedial measures taken:		
Time cleared: AM PM	Did an overflow occur?	
Property damaged?		
Field report completed by:	Date:	

Section C: Overflow Report (Complete the following sections *only if an overflow has occurred*)

Was this a private lateral spill?	If yes, name & phone #, and address of responsible party:	
Time overflow started: AM PM	Time overflow stopped: AM PM	
Overflow durations: (Minutes)	Overflow flow rate: (Gal/Min)	
Initial estimate of overflow quantity: (Gal)		
Describe how overflow quantity was calculated:		
Source of overflow (manhole, cleanout, etc.):		
Describe cause of overflow:		
Describe cleanup method:		
Did the spill discharge* to a drainage channel, or entered and was discharged from a storm drain outfall?		
If yes*, was the spill over 50,000 gallons? If yes, monitoring provisions in Section E are required.		
If no*, did the SSO reach the storm drain system? If yes, were flows fully captured and returned to the sanitary sewer system)? If not fully captured, estimate volume of spill recovered, estimate volume of spill that reached surface water (i.e., street), a drainage channel, or entered and was not recovered from a storm drain.		

Final spill destination:
Were pictures taken? (attached pictures to this form if applicable)
Sanitary Sewer Overflow (SSO) ¹ type (circle one): Category 1 or Category 2 or Category 3 or Private Spill

For office use

Section D: (complete this section for Category 1, 2, or 3 SSO's)

SSO Location Name(s) ² and GPS coordinates:	
Final estimate of overflow quantity:	(Gal)
Regulatory Agencies notified:	
Cal OES (required only for <u>category 1 SSO greater than 1,000 gal</u>)	date/time/contact name/Cal OES control No:
RWQCB (required for all category 1 SSO's)	date/time/contact name (if applicable):
County Health Officer (required for all SSO's)	date/time/contact name:
Others (identify):	date/time/contact name
Office report completed by:	Date:

Section E: (For Category 1 SSO in which 50,000 gallons or greater may have been spilled to surface waters, must implement the SSO Water Quality Monitoring Program)

Were samples not taken due to safety issues?	Date, time and location (map) of samples:
Name of the sampling person:	Identify regulatory agencies received sample results:
Water quality monitoring for: Nutrients, including total nitrogen, total phosphorus, and ammonia; and Bacterial indicators, including total and fecal coliform, enterococcus, and e-coli.	
Describe property damage and affected area:	
Were health warning sign posted?	Were neighbors notified?
Corrective and follow -up measures:	
Last date preventive maintenance performed:	
Is there an ongoing investigation?	
Recommendations on how to eliminate future problems:	

Attach additional sheet for sketch of Area: (Include manholes, intersections, location of stoppage, etc.)

¹ **Category 1**—Any volume discharge of sewage resulting from failure in the City's sanitary sewer system that: result in a discharge to a drainage channel and/or surface water; or discharge to a storm drainpipe that was not fully captured and returned to the sanitary sewer system.

Category 2 - Discharges of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from an enrollee's sanitary sewer system failure or flow condition that does not reach surface water, a drainage channel, or the municipal separate storm sewer system unless the entire SSO volume discharged to the storm drain system is fully recovered and disposed of properly.

Category 3—All other discharges of sewage resulting from a failure in the City's sanitary sewer system.

Private Spill—Sewage discharges that are caused by blockages or other problems within a privately owned lateral.

² If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.