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DATE: 7/22/2020

RESOLUTION NO. 20-29,164

City Clerk

A RESOLUTION OF THE COUNCIL OF THE CITY OF **City of Burbank, California** BURBANK APPROVING THE CITY'S SEWER SYSTEM MANAGEMENT PLAN (SSMP) UPDATE AND CERTIFYING IT IS CONSISTENT WITH STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS (WDRs) FOR SANITARY SEWER SYSTEMS

THE COUNCIL OF THE CITY OF BURBANK FINDS:

- A. On May 2, 2006, the State Water Resources Control Board (SWRCB) adopted Order No. 2006-0003, the Statewide General WDRs for Sanitary Sewer Systems.
- B. These WDRs are the regulatory mechanism for all public agencies that own or operate sanitary sewer collection systems greater than one mile in length and that collect and convey untreated or partially treated wastewater to a publicly owned treatment facility.
- C. The ultimate goal of the WDRs are to reduce the frequency and volume of Sanitary Sewer Overflows (SSOs) by requiring public agencies to properly manage, operate, and maintain their wastewater collection system. This is to be done by developing, implementing, and updating an agency-specific SSMP.
- D. On April 21, 2009, Council adopted Resolution No. 27,893 approving the initial SSMP document.
- E. On April 10, 2014, the City re-certified the SSMP through the SWRCB's regulatory database, California Integrate Water Quality System (CIWQS).

THE COUNCIL OF THE CITY OF BURBANK RESOLVES THAT:

1. The Council hereby approves the City's Sewer System Management Plan Update and certifies it is consistent with Statewide General Waste Discharge Requirements for Sanitary Sewer Systems.

PASSED and ADOPTED this 21st day of July, 2020.

Sharon Springer Mayor

Approved as to Form: Office of the City Attorney

B١ Amy Albano, City Attorney

Attest:

Zizette Mullins, MMC, City Clerk

STATE OF CALIFORNIA COUNTY OF LOS ANGELES CITY OF BURBANK

I, Zizette Mullins, MMC, City Clerk of the City of Burbank, do hereby certify that the foregoing Resolution was duly and regularly passed and adopted by the Council of the City of Burbank at its regular meeting held on the 21st day of July, 2020, by the following vote:

) ss.

AYES: Frutos, Gabel-Luddy, Murphy, Talamantes and Springer.

NOES: None.

ABSENT: None.

Zizette Mullins, MMC, City Clerk

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SEWER SYSTEM MANAGEMENT PLAN UPDATE

CITY OF BURBANK PUBLIC WORKS DEPARTMENT



Prepared under the supervision of: Tyrone Peter, P.E.



Prepared by: Willdan Engineering 13191 Crossroads Parkway North, Suite 405 Industry, CA 91746-3443

July 14, 2020

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Executive Summary

The City of Burbank is required to maintain compliance with the California State Water Resources Control Board Order No. 2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. The purpose of the Order is to require agencies to prepare a plan and schedule for measures to be implemented to reduce the frequency and volume of sanitary sewer overflows (SSOs), as well as measures to effectively clean up and report SSOs. The 2006 Order was amended by Order No. 2013-0058-EXEC which addressed monitoring and reporting requirements.

This Sewer System Management Plan Update (SSMP) is organized to correspond to the sections of the Order. The SSMP consists of eleven chapters.

By implementing the SSMP, the City of Burbank shall:

- Properly fund, manage, maintain and operate its sanitary sewer systems to prevent SSOs
- Construct and maintain the collection system using trained staff (and/or contractors) possessing adequate knowledge, skills, and abilities, as demonstrated through a validated program, and
- Fully comply with the Orders.

Chapter 1 – Goals

The goals of this Sewer System Management Plan Update (SSMP) are as follows:

- To properly manage, operate and maintain all parts of the wastewater collection system
- To provide adequate capacity to convey peak sewer flows
- To minimize the frequency of Sanitary Sewer Overflows (SSO), and
- To minimize the human health and environmental impacts of SSOs.

Chapter 2 – Organization

The management, administrative and maintenance positions responsible for the implementation of this SSMP are identified in Chart 1 included in the Appendix. The Public Works Director and the Assistant Public Works Director – Wastewater Systems are the Legal Responsible Officials (LROs) authorized to certify SSO reports. The Assistant Public Works Director – Wastewater Systems has ultimate authority over the implementation, management and updating of this program.

The flow of communication for the response to a reported SSO is shown in Chart 2 included in the Appendix, which further references the Reporting Requirements flow chart in the SSO Emergency Response Plan. The Assistant Public Works Director – Wastewater Systems and/or the Senior Civil Engineer, and Collection Systems Supervisor will report SSO information to the Los Angeles Regional Water Quality Control Board (RWQCB), Office of Emergency Services (OES), and Los Angeles County Department of Public Health (DPH). The Collection Systems Supervisor is the critical link in collecting the field data to be reported to the RWQCB. The Assistant Public Works Director – Wastewater Systems and/or an engineer from the Wastewater Systems Division will enter the SSO data into the CIWQS database.

Extensive details of SSO response are described in the <u>Sanitary Sewer Overflow Emergency</u> <u>Response Plan</u> contained in the SSMP Appendix.

Chapter 3 – Legal Authority

The City of Burbank has the legal authority through Title 8, Chapter 1 of the Burbank Municipal Code to:

- Prevent illicit discharges into its sewer collection system
- Require that sewers and connections to sewers be properly designed and constructed
- Limit the discharge of fats, oils and grease and other debris that may cause blockages of the sewer
- Enforce the provisions of its sewer ordinances and policies.

A copy of Title 8, Chapter 1 of the Burbank Municipal Code is included in an appendix of this SSMP and can be found at <u>http://www.codepublishing.com/ca/burbank/</u>

Chapter 4 – Operation and Maintenance Program

Appropriate sewer system operations and maintenance are essential elements of the City of Burbank Public Works Department's SSO reduction plan. While the Assistant Public Works Director – Wastewater Systems (APWD) has overall responsibility for the operation and maintenance of the sewer system, this section of the SSMP will provide guidance and specify field level responsibilities for the various elements of the Operation and Maintenance Program.

Mapping

The City of Burbank Public Works Department utilizes a Geographical Information System (GIS) for its wastewater system maps. The wastewater system maps were created based upon record drawings, system video inspection and field verification. The GIS includes sewer features such as pipe location, diameter, material, maintenance holes, sewer pump stations, pressure pipes and valves.

Map Updates

A hardcopy version of the maps will be updated by Wastewater Engineering staff as permits are issued for changes in the sewer collection system, and as sewer collection system improvement projects are completed. A hardcopy version of the map will be updated by the Collection Systems Supervisor as field conditions reveal a need for map corrections.

The marked hard copies of the maps will be collected to update the GIS data. The updates to the GIS will be accomplished by Wastewater Engineering and Information Technology Department staff. Upon the completion of these updates, new hardcopy maps will be distributed to the Collection Systems Crew.¹ The hardcopy maps will include the date that the maps were last updated.

Map Improvements

Future improvements to the maps are anticipated. A goal for future maps will be to include the storm drain system and detail maps for areas which require more information.

Preventative Maintenance

Current Preventative Maintenance by City

Prioritized preventative maintenance currently includes:

Sewer Pipeline Cleaning

The Collection Systems Crew cleans the gravity sewer lines on a regular basis. All pipes ten inches (10") or less in diameter are typically hydro-jetted with a standard cleaning nozzle, or root saw. All pipes greater than ten inches (10") in diameter are

¹ The distribution list for maps shall be: Collection Systems Supervisor Office, Supervisor Truck, Combo Truck, Jet Truck, CCTV Truck, and Wastewater Engineering.

hydro-jetted. All sewers serving restaurants and other food service establishments (FSEs) are cleaned on a more frequent basis. If there is evidence of medium to high fats, oils and grease (FOG) accumulation on a section of sewer pipeline, then the City's Industrial Pretreatment Program (IPP) Inspector(s) are notified. FSEs served by that sewer are inspected to ensure compliance with City sewer ordinances and that BMPs are being properly implemented. Sewer reaches that are subjected to heavy debris accumulation, such as siphons, are hydro-jetted on a more frequent basis.

Sewer Pipeline Inspection

Sewer lines are currently video inspected on an as-needed basis, with every pipeline in the collection systems on an inspection schedule. This video inspection is an important component of the City's condition assessment process used in the prioritization of preventative maintenance activities and in the prioritization of correcting structural deficiencies. Data collected during the course of these activities is also used to adjust maintenance priorities in order to more effectively prevent SSOs. SSO locations, causes and magnitudes are tracked to identify any trends which may lead to the reprioritization of preventative maintenance activities.

Odor Control Maintenance

Smoke testing is conducted in areas experiencing odor problems to identify illicit connections and/or fractures in the sewer system. Illicit connections and fractures can be a significant source of inflow and infiltration. When identified illicit connections and fractures are removed and/or repaired.

Preventative Maintenance by Others

Sewer Lateral User Rebate Program (SLURP)

In addition to routine maintenance activities, the City has implemented an incentive program that encourages residents to maintain their privately-owned sewer laterals. This program provides rebates to owners of single-family residences for cleaning and video-inspecting their sewer lateral. This program is designed to keep roots from private sewer laterals out of the public sewer main, reducing the maintenance frequency and number of overflows from these sewer lateral roots. SLURP also provides useful information to residents regarding the maintenance of their sewer lateral. Additional information on this program is available on the City's website at www.burbankca.gov/slurp.

Vermin Control

Sewers infected by insects are chemically treated every two years, or as needed.

Lift Stations Inspection and Maintenance

The Mariposa and Beachwood Lift Stations are physically inspected on a regular basis. Preventive maintenance is performed routinely to maintain proper operation.

Documentation of Activities

Scheduled Activities

The Collection Systems Crew performs systematic cleaning of the sewer system, beginning at the outer edges of the collection system and working toward the Burbank Water Reclamation Plant.

Inspection of the collection system is performed systematically, beginning with the sections with the oldest pipelines and working toward the sections with more recently installed pipeline.

Current Documentation Practice

Documentation of sewer line cleaning is entered into the Burbank GIS program, approximately daily as the work is completed, using tablet technology. A cleaning report can be accessed in the GIS program which shows the most recent cleaning of each pipeline.

Future Documentation Practice

The City recently upgraded to a newer application-based program for data entry of sewer line cleaning.

Rehabilitation and Replacement Plan

Rehabilitation and Replacement of Known Deficiencies

The City does not have any known areas of significantly defective sewer lines that are in immediate need of repair. It is noted that a Collection System component is considered to be significantly defective if its condition receives a Structural or Operation and Maintenance Pipeline Rating of 4 or 5 based on the City Pipeline Rating System (CPRS). All damaged sewer locations receiving a Pipeline Rating of 5 (Most Significant Defects) that have been identified through previous CCTV inspections, have been repaired.

Rehabilitation and Replacement of Discovered Deficiencies

During the regularly scheduled CCTV inspection of the sewer system, damaged sewer pipe is identified. A ranking from 1 to 5 is given to each damaged location, with 1 being the least severe and 5 being most severe. Those locations identified with a 5 ranking are scheduled for immediate repair. Those locations identified with a lower damage ranking are scheduled for future inspection to evaluate the future need to repair these sections of pipe. Additional information is provided in the Appendix <u>City Pipeline Rating System (CPRS)</u> dated December 2019.

The City has established the following schedule for the assessment and potential repair of City sewer facilities as needed based on the CPRS:

• Complete an updated condition assessment of sewer lines in the City's Collection System (excluding force mains) located within two hundred (200) feet of a surface water, within three (3) years after the publication of the CPRS

If a sewer line or manhole located within two hundred (200) feet of a surface water is determined to be significantly defective, upon securing any necessary permit(s), repair or replace the sewer line or manhole within three (3) years.

• Complete a condition assessment of sewer lines (other than force mains) in the City's Collection System located at a distance greater than two hundred (200) feet from a surface water, within seven (7) years after the publication of the CPRS

If a sewer line or manhole located at a distance greater than two hundred (200) feet of a surface water is determined to be significantly defective, upon securing all necessary permit(s), repair or replace the sewer line or manhole within three (3) years

- Within seven (7) years after a sewer line or manhole is determined to be less than significantly defective but with a CPRS Pipeline Rating of three (3) based on the Condition Assessment, the City will repair or replace gravity sewer lines and/or manholes, or take other appropriate action for such gravity sewer pipe segments containing defects with a Pipeline Rating of three (3) or less under the CPRS, if such defect resulted in a Collection System SSO, or if in the City's discretion, such defects are in close proximity to significantly defective segments that are in the process of being repaired or replaced.
- Sewer pipe segments which contain defects with a Pipeline Rating of three (3) or less under the CPRS that are not repaired or replaced within seven (7) years after completion of the condition assessment will be re-inspected with CCTV in accordance with the applicable condition assessment cycle for such segment to reevaluate the condition of the sewer line segment. If the City determines that a sewer pipe segment with a Pipeline Rating of three (3) or less under the CPRS has deteriorated and needs to be repaired or replaced, the City, upon securing necessary permit(s) and/or rights of way will complete such repair or replacement within three (3) years after the last CCTV cycle.
- The City will re-inspect all sewer lines, manholes, and segments based on the condition assessment cycle.

Training for Collection Systems Crew

The City recognizes the importance of its staff in collection system operations, maintenance and monitoring. Training opportunities are provided in several different ways including:

Tuition Reimbursement

Employees are reimbursed for seventy-five percent (75%) of the cost, up to \$2,500 per individual in any one fiscal year, of tuition, fees, books (including computer software and audio tapes that are required for class participation), and other supplies

(except drafting equipment, tools, etc., which are retained by the employee following completion of the course) for courses which are directly related to the employee's present position or promotion.

Weekly Training

During weekly meetings the collection systems crew staff is provided ongoing equipment and safety training, as well as training in pollution prevention, system maintenance and operation.

Mentoring

The City has established an informal training through mentoring of experienced collection systems personnel with those new to the collection system.

Certification

All members of the collection systems crew are encouraged to obtain certification from the California Water Environment Association (CWEA).

Contractor Training

Burbank requires that any contractors hired for sewer construction and rehabilitation have adequately trained staff.

Contingency Equipment and Replacement Inventories

Collection System Contingency Equipment

Contingency equipment (such as portable pumps, generators) supports an effective response to emergency situations. An inventory of spare/replacement parts kept in inventory minimizes downtime in the event of equipment failure. A list of items kept in inventory is included in the Appendix *Inventory List of Equipment*. This list will be reviewed by the APWD or his designee on at least an annual basis to ensure that there is an adequate inventory of critical parts and equipment needed for system operation and maintenance. The City has established a relationship with the Cities of Glendale, Pasadena and Los Angeles so that in the case of an unforeseen emergency, the City is able to borrow equipment that it does not have in inventory. The City also has a contract with a major environmental emergency response contractor to provide emergency sewer cleanup services on an on-call 24-hour per day, 7-day per week basis. This contractor can provide vacuum trucks, pumps, pressure washers and other emergency equipment and operators as needed.

Pump Station Contingency Equipment

The Mariposa Pump Station has 100% redundant pump capacity. This spare capacity minimizes the risk that this pump station will experience downtime. In addition, the Mariposa pump station has a backup generator which provides emergency power in the case of a power outage. In the event that the Beachwood Pump Station should fail, or experience inflows that are in excess of existing pump capacity, sewage will automatically gravity flow to the City of Los Angeles' North Outfall Sewer.

Chapter 5 – Design and Performance

Design Standard

The City has developed and maintained design guidelines for new and rehabilitated system, with the Sewer Design Manual of City of Los Angeles in a supplemental role.

Inspection and Testing Standards

The City has adopted the Standard Plans and Standard Specifications for Public Works Construction also known as the "Greenbook" as inspection and testing standards.

Performance

The City consistently reviews standard plans and specifications as well as looking to the industry for input to improve design materials and methods. The City collects feedback from contractors at the public counter and additional input from the City inspectors to further improve means and methods.

Chapter 6 – Overflow Emergency Response Plan

The City of Burbank Public Works Department's <u>Sanitary Sewer Overflow Emergency Response</u> <u>Plan</u> contained in the Appendix, provides a standardized course of action for Wastewater Systems personnel to follow in the event of an SSO, and ensures that the City of Burbank is adequately prepared to respond to SSO events.

Chapter 7 – Fats, Oils, and Grease (FOG) Control Program

Background

In the City of Burbank, FOG has been the cause of approximately 40% of all sewer blockages and/or overflows. Since 2000, Public Works' Collection Systems Crew has been tracking major grease dischargers throughout the City. These dischargers are mainly Food Service Establishments (FSEs) or restaurants and monthly "hot spot" lists are generated and submitted to the Industrial Source Reduction and Control Program (ISRCP) inspectors. The crew cleans and monitors these "hot spots" on a monthly basis. The inspectors will follow-up with the individual restaurants verifying that their grease interceptor cleaning manifests are kept up to date in addition to any other Best Management Practices (BMPs) that may be required. Additional grease reduction/elimination education is also provided as necessary.

Following an extensive outreach to and in partnership with the over 330 FSEs in Burbank, the City developed a three-pronged approach to its FOG Control Program, including:

- **1.** Source Control
- 2. Sewer Cleaning
- **3.** Community Outreach and Education

Recognizing that blockages caused by FOG could result in SSOs and have an adverse impact on public health and the environment, the City Council enacted a FOG Control Ordinance (Number 3677) effective August 20, 2005. This Ordinance amended the Burbank Municipal Code (BMC) Section and after restructuring the Code it is currently located under Title 8-1-502.2. Through the implementation of its FOG Control Program, the City has achieved a significant reduction of FOG-related sanitary sewer overflows (SSOs) dating back to fiscal year 2000/01.

FOG Control Program

The following is a description of the City's FOG Control Program following the order provided in the State's General Waste Discharge Requirements for developing SSMP Part 7, FOG Control Program.

Implementation Plan and Schedule for Public Outreach

Public education outreach and stakeholder involvement is an important part of the City's Industrial Source Reduction and Control Program and is an ongoing effort. Educational videos, DVDs, and brochures describing BMPs are distributed to FSEs doing business in the City. The City's Recreation Guide is published on a quarterly basis and regularly includes full page reminders of proper ways to dispose of grease and oil in and around the kitchen.

Plan and Schedule for the Disposal of FOG Generated Within the Sanitary Sewer System

The City does not own or operate any FOG disposal facilities. The FSEs must, at a minimum, collect the waste FOG and prevent the waste FOG discharge into the sewer system by implementing the following BMPs:

- "Dry wipe" pots, pans, dishware and work areas prior to washing. Use rubber scrapers or paper towels to remove FOG from cookware, utensils, and serving ware.
- Collect waste cooking oil and store properly in recycling barrels or drums. Use a licensed hauler or recycling facility to dispose of this waste.
- Use absorbent products to clean under fryer baskets and other locations where FOG may be spilled or dripped.

The City does not allow FOG waste haulers to discharge waste FOG into the sewer system either. However, it provides FSEs with a list of licensed grease haulers and rendering companies.

Legal Authority to Prohibit Discharges and Identify Measures to Prevent SSOs and Blockages Caused by FOG

Burbank Municipal Code Title 8.1, Section 8-1-501.1, provides the legal authority to prohibit FOG discharges by any and all users, including FSEs. To mitigate SSOs resulting from blockages caused by FOG accumulation, the City's Department of Public Works implements its Overflow Emergency Response Plan (OERP). The OERP provides guidelines for investigating FOG-related SSO's and taking enforcement and corrective actions to prevent future occurrences.

Grease Removal Devices Requirements and Standards

Burbank Municipal Code Title 8.1, Section 8-1-502.2.C (c) states the following:

"Grease interceptors or traps, oil separators, and/or grit interceptors shall be provided when, in the opinion of the Director, they are necessary for the proper handling of wastewater containing excessive amounts of grease and oil, or grit; except that such interceptors shall not be required for residential users. All interception units shall be of type and capacity approved by the Director and shall be so located to be easily accessible for cleaning and inspection. Such interceptors, traps, and/or separators shall be inspected, cleaned, and repaired regularly as needed, by the user at their expense."

Major provisions of the FOG Control Ordinance and its Rules and Regulations regarding the requirements for installing and maintaining grease removal devices are summarized below:

Grease Interceptor Requirements

BMC Title 8.1, Section 8-1-502.2.E states the following:

FSEs are required to install, operate, and maintain an approved type and adequately sized, remotely located and readily accessible, grease interceptor, unless a conditional waiver is granted by the Director. All FSEs to be newly constructed are subject to grease

interceptor requirements. Existing FSEs with planned modifications having a building permit valuation of fifty thousand dollars (\$50,000.00) or more are also subject to grease interceptor requirements.

All grease interceptors must be approved by the Director. At the sole discretion of the Director, an FSE determined to have no immediate adverse impact on the public sewer may be granted a conditional waiver from grease interceptor installation requirements. The Director may, at any time, revoke this conditional waiver and require the FSE to install a grease interceptor. If an FSE can demonstrate that installation of a grease interceptor is not feasible due to space constraints or other considerations, the Director may issue a variance from grease interceptor requirements and authorize the installation of alternative grease removal devices. Alternative grease removal devices include, but are not limited to, devices that are used to trap, separate and hold grease from wastewater and prevent it from being discharged into the public sewer. All alternative grease removal devices must be approved by the Director, on a case by case basis.

Installation of grease interceptor(s) is required at all FSEs that have the potential to generate waste FOG unless a Conditional Waiver is granted, including: (1) FSEs that are to be newly constructed, (2) any existing non-FSE converting to an FSE, (3) FSEs with remodeling valued at \$50,000 or more, and (4) any FSE deemed by the Director, for example, any FSE that is known to cause FOG-related sewer blockages or overflows or fails to implement BMPs.

A grease interceptor is a plumbing device, with a minimum size of 750 gallons that is installed in an industrial wastewater drainage system to intercept and prohibit FOG from entering the sewer system. The design, construction, installation and testing of commercial kitchen grease interceptors or grease traps shall be in accordance with the California Plumbing Code and/or the County of Los Angeles Pretreatment Guidelines for Restaurant and Food Service Operations.

Operation and Maintenance of Grease Interceptors

FSEs are required to comply with the following requirements for operation and maintenance of grease interceptors:

- Grease interceptors shall be maintained in efficient operating condition by periodic removal of accumulated grease including floating material, sludge and solids
- Grease interceptors shall be cleaned at a frequency such that the combined FOG and solids accumulation does not exceed 25% of the total liquid depth of the grease interceptor
- A log of grease interceptor cleaning and maintenance practices shall be maintained
- Copies of records and manifests of hauled waste FOG or hauled interceptor wastewater shall be maintained in FSEs files

• FSEs are also required to comply with the requirements for the operation and maintenance of grease traps as set forth in the manufacturers' specifications.

Authority to Inspect Grease Producing Facilities, and Enforcement

Burbank Municipal Code Title 8.1, Section 8-1-506.1, provides the Department of Public Works with the legal authority to inspect FSEs and monitor the implementation of Best Management Practices. As part of routine inspection activities, inspectors from the ISRCP determine permit requirements and verify compliance with the BMC 8.1 provisions. Additionally, information and training materials such as multi-language DVDs, BMP posters, a summary of FOG Control BMPs, and lists of licensed grease waste haulers and pretreatment equipment manufacturers are provided to help businesses comply. Major provisions of the BMC 8.1 are summarized below:

Wastewater Discharge Permit

FSEs are required to obtain a Waste Discharge Permit, including paying a Permit Application Fee and an Annual Inspection and Control fee in accordance with the currently adopted Citywide Fee Schedule and based on the Discharger class. An FSE may be authorized to use the sewer if it does not potentially generate waste FOG during food preparation processes, and does not significantly affect the publicly owned treatment works (POTW), provided that the FSE has implemented and demonstrates compliance with BMPs as specified in the Rules and Regulations, and does not qualify as a stormwater "Critical Source".

Revocation of Conditional Waivers

The Director's determination to revoke an FSE's Conditional Waiver from Grease Interceptor Installation Requirements is based on the FSE's non-compliance with any of the terms and conditions of the Conditional Waiver. Specific violations that may result in revocation of the FSE's Conditional Waiver are as follows:

- The FSE disposes of food waste into sinks or equivalent, rather than directly into the trash or garbage receptacles
- The FSE fails to "Dry Wipe" all pots, pans, dishware and work areas prior to washing of such utensils, equipment or areas
- The FSE fails to collect waste cooking oil and store it properly in recycling barrels or drums
- The FSE is confirmed to have contributed to FOG accumulation within the sewer collection system that resulted in, or threatens to result in, a Sanitary Sewer Overflow (SSO)
- The FSE fails to comply with any other condition deemed appropriate by the Director.

Variance to Allow Alternative Grease Removal Devices

BMC Section 8-1-502.2 (E) states: "If an FSE can demonstrate that installation of a grease interceptor is not feasible due to space constraints or other considerations, the Director may issue a variance from grease interceptor requirements and authorize the installation of alternative grease removal devices. Alternative grease removal devices include, but are not limited to, devices that are used to trap, separate and hold grease from wastewater and prevent it from being discharged into the public sewer. All alternative grease removal devices must be approved by the Director, on a case by case basis.

Identification of Sanitary Sewer System Sections Subject to FOG blockages and Establishment of Maintenance Schedule

SSOs caused by blockages from FOG are monitored for location and required cleaning frequency. All blockages are logged and potential source identified by FSE name and address. Locations with a high number of FOG blockages are given special investigation and cleaning status. Sewers prone to FOG accumulation or blockages are given high priority and cleaned more frequently in an effort to prevent FOG-related overflows. All reaches, including "non-problem" sewers, are included in a routine preventive maintenance cleaning schedule.

Development and Implementation of Source Control Measures for All Sources of FOG

The ISRCP investigates potential source(s) of FOG waste to verify compliance with applicable sections of BMC-8.1. The City implements an Enforcement Response Plan. FSEs are required to have an industrial wastewater permit, comply with source control measures for all sources of grease, implement BMPs, install grease interceptors as applicable, and are subject to routine inspections to verify continuous compliance.

In the event a user fails to comply with the requirements of BMC-8.1, the ISRCP takes immediate enforcement action. The Enforcement actions available include the following:

- Notice of Violation (NOV) A notice by certified mail or personal service which identifies the permit condition(s) violated, the circumstances surrounding the violation(s), and provides the FSE with an opportunity to correct the noncompliance on its own initiative.
- Within 10 days of the NOV, the FSE is required to conduct an investigation and submit a written response describing the cause of the violation, the actions taken to correct the violation or prevent future violations and the date those corrective actions will be completed.
- Conditional Waiver Revocation The City may revoke the FSE's Conditional Waiver for cause and require an installation of a grease interceptor.
- Administrative Enforcement Order An order that requires the FSE to cease a specific activity and implement corrective actions to permanently achieve and maintain compliance. An Order may be issued when an FSE fails to achieve compliance after a NOV is issued or when a pattern of noncompliance is observed.

• The City may pursue civil and criminal penalties, as well as injunctive relief.

Reference

BMC-8.1 Sewers Section, Article 5 - Industrial Waste and Disposal, City of Burbank, Department of Public Works

Chapter 8 – System Evaluation and Capacity Assurance Plan

The City of Burbank prepares and implements a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event.

Evaluation

Potential structural deficiencies have been identified and prioritized in the Sewer System Evaluation and Capacity Assurance Plan prepared by Kennedy Jenks in April 2006, which is referenced in the Appendix to this plan. The deficiencies identified in the Kennedy Jenks Plan are based on maximum build-out under current zoning regulations.

Design Criteria

The City has adopted the Standard Specifications and Plans for Public Works Construction also known as the "Greenbook" as the design criteria, with the Sewer Design Manual of City of Los Angeles in a supplemental role.

Capacity Enhancement Measures

Short-term rehabilitation actions such as flow changes effected by the adjustment of diversion gates have already been implemented. Long-term rehabilitation actions have been identified and scheduled for the entire system based on the availability of funds. Some identified structural deficiencies will be made by private developers to mitigate the impacts of new development.

Schedule

The City has developed and maintained a schedule of completion dates for all capital improvement programs. The schedule is to be reviewed and re-evaluated in accordance with the SSMP review and update requirement.

Chapter 9 – Monitoring, Measurements and Program Modifications

The Wastewater Systems Division collects and analyzes information to establish and prioritize appropriate maintenance and operations activities by using this information to identify SSO trends, pipeline sections of observed grease, root or debris accumulation, etc. At the time of this update, the primary identified cause of SSO's continues to be root blockages and grease blockages. As a result, the Wastewater Systems Division will routinely inspect and clean sewer lines in areas of known grease accumulation. This division has also conducted field studies of root killing products. The Wastewater Systems Division will continue to collect and analyze information to establish and prioritize appropriate maintenance and operations activities.

Monitoring, Measurements and Program Modifications are vital to keeping appropriate SSMP activities current. Overall, maintaining the sewer system at an acceptable working level and minimizing SSO's are the long term goals of the City of Burbank. Being innovative and proactive with City programs allows for a reduction in negative effects within our system caused by blockages that can and do arise from many unexpected and expected contingencies. Establishing appropriate guidelines to follow will allow for any potential issue to be prioritized and resolved in a timely manner.

Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities

The City has been active in implementing programs that assist staff in gathering data and information to solidify the needs to prioritize its Sewer System Management Plan (SSMP).

Sewer Main & Private Lateral Connection Evaluation

The City utilizes its CCTV capability to classify inspected sewer mains and private lateral connections using a system based on the CPRS. Sewer mains are identified as having grease, roots or debris, and are categorized based on the severity of the condition. Lateral connections are also classified based on their degree of root infestation or debris at the connection with the City main. The criteria under which Sewer Mains & Private Lateral Connections are classified are as follows: Heavy/Major, Moderate/Medium and Light/Minor. The initial classification is at the discretion of the field operator, and is then verified by Engineering staff when the video inspections are subsequently reviewed. Sewer mains which have heavy or moderate debris that could cause an SSO are addressed immediately. Sewer mains with light debris are cleaned in a timely manner based on the maintenance schedule. The overall pipeline rating is a combination of inspection criteria and Engineering judgement.

Private Lateral Connections are privately owned and maintained. During the CCTV inspections, the Private Lateral connections are observed and if a medium or heavy condition is observed, a courtesy contact is made by Wastewater Systems staff informing the property owner of the discovery along with information of our SLURP program which is geared to residential premises. Those connections which service commercial or

industrial users, if deemed to contribute to possible blockages trigger inspections from our industrial waste inspectors. For possible residential issues, staff researches the information via our GIS systems to identify the private lateral and which resident is affected. After this research takes place and the resident is identified staff will contact the resident through mail.

Operation and Maintenance

Various means have been developed to maintain an appropriate working collection system. Responsibilities have been allocated in making the program an essential element of the SSMP. Maintenance is carried out by staff assigned to take on certain responsibilities.

The City's Wastewater/Sewer system is divided into 20 sections. Staff is assigned specific designations to conduct maintenance throughout the year. City crews have a daily goal of 6000 - 8000 feet. Maintenance typically consists of cleaning the City sewer mains via hydro-jetting and during certain occasions using mechanical root cutters. Whether a main is problematic or not, maintenance and preventative maintenance are done along all City mains throughout the year.

A hard copy record or log of the sections maintained are kept on file keeping a timeframe of the last time a section was cleaned. During maintenance, if differences are encountered from what is on record, it will be noted and our GIS system will be updated. The City's GIS system contains pertinent information in relation to our sewer system. Updating the GIS, allows the City to identify information that can be gathered on a more reliable bases. During maintenance, the data observed and collected will serve to adjust priorities and prevent SSOs.

In areas with Food Service Establishments (FSEs) or industrial users, blockages can occur on a more frequent basis due to the contents discharged, i.e. Fats, Oil & Grease. In helping to alleviate this occurrence, our industrial waste inspectors inspect FSEs to confirm that they are in compliance and proper BMPs are in place. Our inspectors confirm and cross reference information on file to make sure industrial users have Waste Discharge Authorizations and/or Permits.

Documenting activities is currently done with hard copies and the Burbank workflow program which generates reports to show the most recent cleaned sections. The Collection Systems Crew works based on a systematic schedule which has them performing inspections and maintenance from older pipes to newer pipes within each section. The City continues to work towards integrating paper documents with the GIS system.

Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP

The Wastewater Systems Division monitors the implementation effectiveness of each element of the SSMP in relation to the WDR compliance regulations. Future

modifications and updates to the City's SSMP will be based on implementation of the plan.

Assess the success of the preventative maintenance program

Assessing and monitoring the preventative maintenance program is crucial to maintaining proper working functions of the system. Through the tracking of records, it can be determined if adjustments or modifications need to be taken. Trends develop over a period of time allowing the City to modify and adequately adjust the program as needed. The City has been proactive in addressing issues with private lateral connections. Informing the public to be proactive and work with the City to help prevent and/or reduce blockages and overflows that can affect the City as well as the public.

Update program elements, as appropriate, based on monitoring or performance evaluations

The City's performance is evaluated on a consistent basis based on monitoring and reviewing of existing programs. As needed, improvements are made to enhance the performance of the system.

Preventative maintenance program

During the maintenance process, City sewer mains are identified and noted as having certain criteria that require more attention. The City is made aware of sections within the system susceptible to factors such as overflows, blockages and other pipe conditions. CCTV recording assists in identifying potential sections of the sewer that need to be addressed. Whether in poor condition or infiltrated with roots or debris, assessing the sewer through this method will allow for maintenance to be conducted more often in problematic areas.

Fats, Oils, and Grease (FOG)

The City's program is intended to identify and reduce overflows in relation to FOG. Implementation of the program and requiring FSEs to place adequate BMPs assist the City in the reduction of FOG impacts. Monitoring, site inspections and scheduled maintenance on sewers providing a service to those FSEs have resulted in a decreased impact of FOG related SSOs.

City Tree Root Program

The City mains are maintained year round using hydro-jetting to address blockages. CCTV inspection is one way of identifying problematic areas that need to be addressed as well as notification from the public when their sewer is affected.

Infiltrating roots affect both private and public sewers. The City has been proactive in creating programs to have the public assist in preventing SSOs. Utilizing the CCTV inspections, the City is able to identify locations with adversely impacted root problems and bring them to the attention of the owner to prevent an SSO from occurring. The City provides the public with helpful information gathered from feedback received. Although

the City does not endorse certain entities, we do provide details to assist private owners. City staff is also available to assist residents who have questions.

Sewer Design & Construction

The City uses the Standard Specifications and Plans for Public Works Construction, also known as the "Greenbook," for design purposes.

The City implements its "zero spill" policy on construction projects. As part of project approvals, the City requires a spill prevention and response plan to be submitted, approved and implemented during the term of the construction.

Identify and illustrate SSO trends, including: frequency, location and volume

Trends are identified through collecting and analyzing information. Based on the findings, sections are prioritized, and maintenance and operations are conducted accordingly. The City will collect information to establish future activities appropriately on a continuous basis.

SSO Reporting and Response

The City will continue to comply with all training, reporting, and response actions set forth in the State and Federal permits, and regulatory and legislative requirements imposed by the various agencies having jurisdiction over the City's waste water collection, conveyance, and treatment system. The City will continue to provide the following information to the CIWQS State Reporting System:

- The methodology and actual calculations, used for estimating total spill volume, spill volume that reached surface waters, and spill volume recovered as approved by the State Water Resources Control Board and Sanitary Sewer collection industry (e.g., the California Water Environmental Association/Southern Collection System Committee), as applicable
- For Category I and II spills as defined in the Statewide WDR, a good faith effort to ascertain an accurate estimate of the start time of the Collection System SSO based upon direct observation and witness inquiry where the observer or witness can be reasonably identified by City Staff or City representatives, rather than setting the start time of the Collection System SSO as the time the call was received or the Collection System SSO was reported
- When reasonably feasible and without interfering with the immediate goal of addressing the obstruction and returning sewage to the system, photographs of the manhole flow will be taken at the Collection System SSO site using either the San Diego or Central Coast Method array, if applicable to the Collection System SSO, or other photographic evidence that may aid in establishing the spill volume.

The City will continue to implement a spill response training and sampling program to determine the nature and impact of Collection System SSOs, including the following cleanup and disinfection procedures associated with a Collection System SSO event:

- Water quality sampling for E. coli and ammonia will be conducted for any "Qualifying Event," pursuant to SWRCB Bacteria Provisions and a Water Quality Standards Variance Policy dated August 7, 2018. It is noted that a "Qualifying Event" is a Collection System SSO that may present an imminent and substantial endangerment to health or the environment regardless of size or whether the Collection System SSO is discharged to land or water. The determination of whether an event is a Qualifying Event will be documented in writing by a person qualified to make that determination. Qualified persons include, but are not limited to, qualified City Staff or qualified City consultants.
- In the event the City cannot confirm that specific pathogens or human markers from a "Qualifying Event" have been removed or mitigated, where feasible and when weather or other conditions allow City Staff or City representatives to safely do so, and at the direction of the appropriate agency with authority to direct the placement of warning signs, the City will notify the appropriate responsible jurisdiction or agency to post and maintain appropriate public notification signs and place barricades to keep vehicles and pedestrians away from contact with spilled sewage.
- Water quality sampling and testing is required when a Qualifying Event occurs, to determine the extent and impact of the Collection System SSO, whenever there is a Collection System SSO that either enters a surface water or is discharged to a surface where it poses a risk to public health or the environment.
- After the City determines that there has been a Qualifying Event, the City will collect sample(s) where feasible or if required by the SWRCB or Los Angeles RWQCB. Samples should be collected as soon as reasonably possible after the discovery of the Qualifying Event. Feasibility for obtaining a sample depends on, but is not limited to, whether sufficient flow exists to collect a representative sample. Feasibility will also include considerations of when weather, sampling site access or other conditions allowing City Staff or City representatives to safely obtain a sample, and laboratory availability considering sample hold times. City Staff or City representatives will not be placed at risk for injury.
- In the event that a Qualifying Event occurs, City Staff or City representatives will collect and test samples from three (3) locations, if feasible and the conditions are not unsafe the point of discharge, upstream of the point of discharge, and downstream of the point of discharge. Constituents to be tested for are E. coli and ammonia. Water quality sample results will be reported in an appropriate category on the CIWQS reporting form or as required by the SWRCB. Any requirements under this provision which conflict with sampling or testing requirements by a regulatory agency (e.g., the sampling location, frequency, parameters analyzed), either currently in effect or adopted in the future, shall cease to be in effect.

For reference, the City will create a link from the its website to the California Integrated Water Quality System (CIWQS) SSO Public Reports' website for customers and members of the public, and will highlight the 24-hour, 7 days per week emergency hotline on the City's website.

Chapter 10 – SSMP Program Audits

Program audits are required every two years and document the success of the SSMP and improvements made to it.

Compliance Summary

The City of Burbank has a current internal audit program that evaluates the compliance and conformance of all programs associated with the SSMP. The Wastewater Engineering Division is responsible to conduct a comprehensive, agency-wide audit every two years as the SSMP is implemented. An audit checklist and guidelines are developed to identify deficiencies and subsequent corrective actions, to evaluate agency compliance and conformance with SSMP requirements.

Document Control

All SSMP documents are located in Public Works Wastewater Engineering Division Library. A "SSMP Creation" folder in public drive also serves as the electronic library for the SSMP.

Roles and Responsibilities

The Assistant Public Works Director- Wastewater Systems and Senior Civil Engineer oversee the agency-wide SSMP audit. The Collection Systems Supervisor oversees the audit of field equipment and performance.

Chapter 11- Communication Program

Community and Satellite outreach

The City of Burbank communicates with satellite contributors and members of the community regularly. The City receives wastewater inflow from and discharges outflow to the City of Los Angeles under contractual agreements. The City of Burbank regularly communicates with the City of Los Angeles by providing flow and strength values to assess financial obligations. The City will continue to communicate regularly with stakeholders on the development and implementation of the SSMP.

Staff SSMP awareness

City staff is required to study elements of the SSMP and provide input on its performance and improvement on continuous basis.

Appendix

- Wastewater Systems Division Organization Chart (included)
- SSO Procedures Flow Chart (included)
- SSO Emergency Response Plan (included)
- City of Burbank Municipal Code– Title 8, Chapter 1 (included)
- Standard Specifications and Plans for Public Works Construction (see separated folder, not included)
- System Evaluation and Capacity AssuranceSanitary Sewer Management Plan by Kennedy and Jenks (see separated folder, not included)
- Amalgamated Agreement with City of Los Angeles (included)
- Inventory List of Equipment (included)
- City Pipeline Rating System (CPRS) (included)