

*California*

Water Boards

*Protecting California's Water*



# **Sanitary Sewer Order Enforcement and Tips on Preparing for an Audit**

**SCAP Workshop (El Toro, CA), 4/22/2012**

Jim Fischer, P.E.  
Special Investigations Unit  
State Water Board, Office of Enforcement  
1001 I Street, Sacramento, CA 95814  
[jfischer@waterboards.ca.gov](mailto:jfischer@waterboards.ca.gov)

# Background (PART 1)

- 1.1 Who is inspecting?
- 1.2 Why are we inspecting?
- 1.3 Inspections conducted to date
- 1.4 Common violations/areas of concern
- 1.5 Systems likely to be inspected
- 1.6 2012 inspection commitments



# Details (PART 2)

2.1 Areas likely to be checked

2.2 Post-inspection follow-up

2.3 Enforcement Response Summary

2.4 Sample Enforcement Excerpts

2.5 Tips on Being Prepared

2.6 Reminder: SSMP Self Audit Requirements



# **PART 1**

## **Background**

# 1.1 Who is inspecting?



- Regional Water Boards
- State Water Board, Office of Enforcement
  - ✓ 5 Investigators: SSO enforcement
  - ✓ Often accompanied by Regional Board staff
- US EPA, Region IX, Clean Water Act Compliance
  - ✓ Partnering with State/Regional Water Boards
  - ✓ SSSWDRs provides tool for program evaluation (CIWQS data and metrics, SSMP, MRP compliance, data audits to verify SSO reporting accuracy, etc.)
- US EPA IX Contractors: 20 inspections (CY2012)

## 1.2 Why are we inspecting?

- Reduce SSOs and their impacts on public health and the environment
- Inspect sites to evaluate adequacy of SSO preparedness and field response activities
- ID violations and/or areas of concern
- Deliver fast, firm, fair enforcement where needed
- Establish “compliance baseline” since most systems have never been inspected

## 1.2 Why are we inspecting? (cont'd)

- Promote program compliance and conformity
- Check accuracy of SSO reporting including interviews with collections staff to assess discharger's reported data and assess SSMP implementation
- Evaluate discharger's inspection and maintenance procedures, including record keeping practices, methodologies, and calculations for estimating SSO volume discharged



## 1.2 Why are we inspecting? (cont'd)

- Identify and document positive SSO response, mitigation, and prevention strategies
- ID SSSWDR enforceability issues to support revisions to Monitoring and Reporting Program (MRP)
- Increase staff knowledge about Best Management Practices (BMPs) to document, reduce and/or eliminate SSOs





## **1.3 Inspections conducted to date**

## 1.3 Inspections Conducted to Date

- ~ 30 sites
- Most are unannounced to evaluate sites as close to normal operations as possible
- Statewide coverage; small (8 miles) medium (100+ miles) and large systems (>3,000 miles)
- Some informal and formal enforcement actions pending

# 1.4 Common Violations/Areas of Concern

**SUBJECT:** Notice of Violation of Order No. 2006-0003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Sanitary Sewer Order)*, Order No. 2008-0002-EXEC, *State Water Board Order Adopting Amended Monitoring and Reporting*

## Applicable Order Requirements

The City owns and operates a collection system subject to the Sanitary Sewer Order<sup>1</sup> and the Amended MRP<sup>2</sup>. The City signed a Notice of Intent to comply with the terms of the Sanitary Sewer Order and any subsequent amendments on September 16, 2006. The Sanitary Sewer Order prohibits any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States or creates a nuisance as defined in California Water Code (CWC) section 13050(m). (See Prohibitions C.1 and C.2, respectively, of the Sanitary Sewer Order.) Permittees under the Sanitary Sewer Order are required to report SSOs to the State's California Integrated Water Quality System (CIWQS). The Amended MRP establishes monitoring, record keeping,

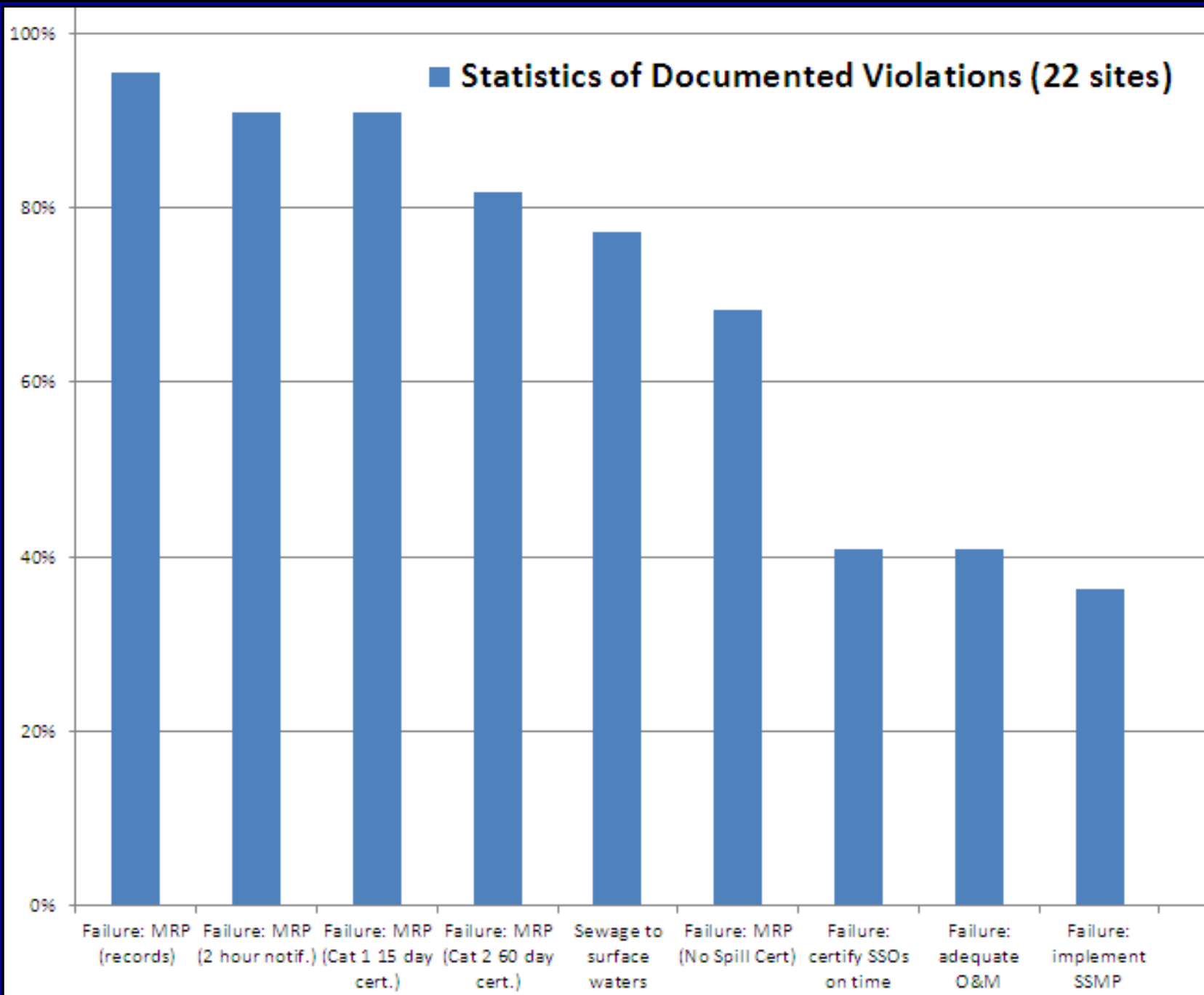
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<sup>1</sup> Sanitary Sewer Order is available at  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2006/wqo/wqo2006\\_0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2006/wqo/wqo2006_0003.pdf)

<sup>2</sup> Amended MRP is available at  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2008/wao/wao2008\\_0002\\_exec.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2008/wao/wao2008_0002_exec.pdf)

## 1.4 Common Violations

- Amended MRP: Failure to identify and report all SSOs (including sewer backups into structures caused by SSOs)
- Amended MRP: Failure to maintain adequate records to support data certified in CIWQS (volume estimations, start/end times, etc.)
- Provision D.8: Failure to adequately maintain sewer assets (pump stations, force mains, sewer lines, etc.) to “properly manage, operate, and maintain all parts of the sanitary sewer system”
- Provision D.13: Failure to adequately address SSMP elements, including data collection, measurements and performance info needed for SSMP audit (2-year)



# 1.4 Common Violations (example: inadequate documentation)

**INCIDENT REPORT FORM**

DATE: 11-19-11 BY: \_\_\_\_\_  
 ATLAS: #        ESW: \_\_\_\_\_  
 BASIN: #        SUPV: \_\_\_\_\_  
 REPORT: # 129/9 SUPT: \_\_\_\_\_

( ) FAX RWQCB ( ) COMPUTER  
 ( ) FAX CNTY HEALTH ( ) WALL MAP

ADDRESS: 626 E. \_\_\_\_\_

<p>1. ESW RECEIVED FROM: <u>CONTRAC.</u> @ <u>0715</u></p> <p>WORKED _____ - _____ = _____ hrs</p>	<p>2. CREW RECEIVED FROM: <u>624</u> @ <u>0730</u></p> <p>STOPPAGE CLEARED AT: <u>0810</u></p> <p>WORKED: <u>0745</u> - <u>1230</u> = <u>4.75</u> TOTAL</p>																				
<p>3. SEWER STRUCTURE INFO:</p> <p>UPMH #: <u>      </u> DHMH #: <u>      </u></p> <p>EXPLOSIVES: <u>      </u> (0-2) <u>      </u></p> <p>OXYGEN %: <u>      </u> (19.5-23.5) <u>      </u></p> <p>H2S ppm: <u>      </u> (0-10) <u>      </u></p> <p>MANHOLE ENTRY REQUIRED? ( ) YES (X) NO        If Yes, ***Confined Spaces Permit Required***</p>	<p>4. WEATHER:</p> <p>CLEAR (X) FAIR ( ) RAIN ( )</p> <p>5. SIZE AND TYPE OF MATERIAL:</p> <p>SIZE: <u>8"</u> M.H. # / DEPTH: <u>606-028, 8'</u></p> <p>( ) CLAY (X) PVC        ( ) CAST IRON ( ) OTHER        ( ) DUCTILE</p>																				
<p>6. CAUSE AND TYPE OF SYSTEM FAILURE:</p> <p>( ) ROOTS ( ) CONTRACTOR        ( ) GREASE ( ) BILLED ( ) YES ( ) NO        ( ) UNKNOWN (X) OTHER        ( ) PRIVATE ( ) COND 3        ( ) CORRECTION NOTICE (X) COND 4 <u>66-26</u></p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>7. PERSONNEL:</th> <th>HRS</th> <th>VEHICLE</th> <th>HRS</th> </tr> </thead> <tbody> <tr> <td>_____</td> <td style="text-align: center;">4.75</td> <td style="text-align: center;">L-2</td> <td style="text-align: center;">4.75</td> </tr> <tr> <td>_____</td> <td style="text-align: center;">4.75</td> <td style="text-align: center;">L-4</td> <td style="text-align: center;">4.75</td> </tr> <tr> <td>_____</td> <td style="text-align: center;">3.5</td> <td style="text-align: center;">L-1</td> <td style="text-align: center;">3.5</td> </tr> <tr> <td>_____</td> <td style="text-align: center;">4.75</td> <td></td> <td></td> </tr> </tbody> </table>	7. PERSONNEL:	HRS	VEHICLE	HRS	_____	4.75	L-2	4.75	_____	4.75	L-4	4.75	_____	3.5	L-1	3.5	_____	4.75		
7. PERSONNEL:	HRS	VEHICLE	HRS																		
_____	4.75	L-2	4.75																		
_____	4.75	L-4	4.75																		
_____	3.5	L-1	3.5																		
_____	4.75																				
<p>8. CORRECTIVE ACTION TAKEN:</p> <p><u>RAW CITY MAIN 370" FROM MH-606-028 TO MH-_____ TO</u>  <u>BREAK PLUG. CAUGHT RAGS AND A PIECE OF WOOD IN BASKET.</u></p>																					

# 1.4 Common Violations (example: inadequate documentation)

Collection Work Order Form	
Project Name:	
Location: (Number & Address / Site) 1 Beach Blvd	Date: 1-30-10
Equipment Used: 212, 602	Work Order Status: (Open / <u>Closed</u> / Service Request)
Collection Task Number: 54	Operator:
Description: PUMP STORM DRAIN ONTO beach	Hours Worked: (Reg / <u>OT</u> ) 9:30 AM to 4:30 PM
Comment:	
Collection Work Order Form	
Project Name:	
Location: (Number & Address / Site) Beach Blvd	Date: 1-31-10
Equipment Used: own	Work Order Status: (Open / <u>Closed</u> / Service Request)
Collection Task Number: 54	Operator:
Description: CHECK ON HIGH TIDE	Hours Worked: (Reg / <u>OT</u> ) 12 AM to 12:30 AM
Comment:	

# 1.4 Common Violations (NOV/13267 Order)

<p>4) <i>The City failed to retain adequate SSO record documentation.</i></p>	<p>Provision B.5 of MRP (see page 5)</p>	<p>a) The City did not maintain adequate documentation to verify and substantiate the SSO volumes reported in certified SSO reports in CIWQS. Specifically, the City failed to document the method of estimating the SSO volume discharged and the SSO volume recovered for any given SSO event. This data is crucial to supporting the accuracy of data reported by the City in determining and justifying the estimated environmental impacts from the SSOs.</p> <p>b) In 166 out of the 194 SSO reports, the City has certified the SSO start time was the same time that the City was first notified of the SSO. However, in most instances, where SSOs are typically reported to the City by outside parties and by the time an individual discovers an SSO and reports it to the City, the SSO would have already begun discharging from the collection system before the City is actually notified. Thus, in these instances, the SSO volume certified in CIWQS by the City would likely be underestimated. Therefore, it would be inappropriate for the City to routinely use the time that the City was first notified about an SSO as the SSO start time, unless investigative procedures undertaken by the City are unsuccessful in obtaining more accurate information to justify the SSO start time. The City is required to implement investigative procedures for all SSOs which include, at a minimum, contacting and interviewing the original complainant(s) to improve the accuracy in determining the actual SSO start time.</p>
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## 1.4 Common Violations

- Amended MRP: False “No Spill” reporting
- Amended MRP: Failure to meet required 2-hour notification/reporting requirements for discharges to surface waters/drainage channels
- Provision D.13: Failure to implement needed sewer programs or to enhance existing practices to align with committed goals, objectives, and strategies in SSMP

# 1.4 Common Violations (NOV/13267 Order)

**TABLE 1: VIOLATIONS**

FINDING	Applicable Requirement	COMMENTS
<b>SSO DISCHARGES</b>		
<p>1) <i>Based on the review of CIWQS<sup>1</sup> data between 5/2/07 and 10/12/11, the City certified 195 Sanitary Sewer Overflows (SSOs) of which 95 (or 49 percent of the total SSOs) were "Category 1"<sup>2</sup> and 100 (or 51 percent) were "Category 2"<sup>3</sup>.</i></p>	<p>Prohibitions C.1 and C.2 of Sanitary Sewer Order (see page 7)</p>	<p>All of the Category 1 SSOs that discharged to waters of the United States are in violation of Prohibition C.1 of the Sanitary Sewer Order. In addition, all SSOs (Category 1 and 2) created a nuisance as defined by CWC section 13050(m) thus are in violation of Prohibition C.2 of the Sanitary Sewer Order. A CIWQS summary of the City's SSOs is provided in Attachment C. In addition, a Performance Report generated by CIWQS is provided in Attachment D.</p>
<b>SSO NOTIFICATION, REPORTING and DOCUMENTATION</b>		
<p>2) <i>Between 5/2/07 and 10/12/11, the City failed to timely certify 80 out of a total of 95 "Category 1" CIWQS SSO reports (or a 16 percent compliance rate) and 66 out of total of 100 "Category 2" CIWQS SSO reports (or a 33 percent compliance rate).</i></p>	<p>Provision A.4 and A.5 of MRP (see page 2)</p>	<p>The City is required to complete a final, certified report through CIWQS within 15 calendar days of the conclusion of a Category 1 SSO response and remediation, and within 30 days after the end of the calendar month in which a Category 2 SSO occurred. A list of the SSOs which the City did not meet the required timeframes is presented in Attachments E1 (Category 1) and E2 (Category 2).</p>

# 1.4 Common Violations (NOV/13267 Order)

TABLE 1: VIOLATIONS (contd.)		
FINDING	Applicable Requirement	COMMENTS
3) <i>The City failed to comply with the required 2-hour notification for 33 SSOs that reached a drainage channel or surface water out of a total of 91 SSOs where notification was required (or a 64 percent compliance rate).</i>	Notification Provision 1 of MRP (see page 1)	Since 2/20/08 when the MRP became effective, the City failed to timely notify all three required agencies [State Office of Emergency Services (California Emergency Management Agency after October 1, 2008), the local health officer, and the Regional Water Board] within two hours of becoming aware of an SSO reaching a drainage channel or surface water. A list of the SSOs which the City failed to provide a 2-hour notification to the appropriate agencies is provided in Attachment F.
4) <i>The City failed to retain adequate SSO record documentation.</i>	Provision B.5 of MRP (see page 5)	<p>a) The City did not maintain adequate documentation to verify and substantiate the SSO volumes reported in certified SSO reports in CIWQS. Specifically, the City failed to document the method of estimating the SSO volume discharged and the SSO volume recovered for any given SSO event. This data is crucial to supporting the accuracy of data reported by the City in determining and justifying the estimated environmental impacts from the SSOs.</p> <p>b) In 166 out of the 194 SSO reports, the City has certified the SSO start time was the same time that the City was first notified of the SSO. However, in most instances, where SSOs are typically reported to the City by outside parties and by the time an individual discovers an SSO and reports it to the City, the SSO would have already begun discharging from the collection system before the City is actually notified. Thus, in these instances, the SSO volume certified in CIWQS by the City would likely be underestimated. Therefore, it would be inappropriate for the City to routinely use the time that the City was first notified about an SSO as the SSO start time, unless investigative procedures undertaken by the City are unsuccessful in obtaining more accurate information to justify the SSO start time. The City is required to implement investigative procedures for all SSOs which include, at a minimum, contacting and interviewing the original complainant(s) to improve the accuracy in determining the actual SSO start time.</p>

# 1.4 Common Violations (NOV/13267 Order)

TABLE 1: VIOLATIONS (contd.)		
FINDING	Applicable Requirement	COMMENTS
5) <i>Based on the review of CIWQS data, the City failed to submit the no SSOs certification statement for four different months within the required timeframe of the General WDR.</i>	Provision A.7 of the MRP (see page 2)	The City is required to submit a certification statement online to CIWQS within 30 days after the end of the each calendar month in which no SSOs occurred. For April 2010, January 2009, December 2008, and November 2008, the City missed the deadline by 185 days, 79 days, 111 days and 142 days, respectively. (In addition, the City inadvertently submitted two entries for April 2009. The City should contact the CIWQS helpline at 1-866-792-4977 to get one of these entries removed.)
6) <i>The City failed to update its CIWQS "Collection System Questionnaire" to accurately reflect current information at least every 12 months.</i>	Provision G.3 of Sanitary Sewer Order (see page 18)	The City is required to update its collection system questionnaire at least every 12 months to accurately reflect current information. In addition, the inspection revealed deficiencies in the accuracy of the required information submitted by the City's in its "Collection System Questionnaire", last updated by the City on 12/2/10. The questionnaire incorrectly states the City's population as 130,000, while the City stated during the inspection that its population is 68,240 based on the 2010 Census.
SEWER SYSTEM MANAGEMENT PLAN (SSMP)		
7) <i>The City failed to develop a complete an adequate SSMP within the timeframes identified in July 2005 Order. In addition, the City failed to present the SSMP to its governing board for approval at a public meeting and failed to make a copy of the SSMP publicly available at the City's office and/or available on the Internet pursuant to the Sanitary Sewer Order.</i>	July 2005 Order; Provisions D.11, D.13, D.14 and D.15 of Sanitary Sewer Order (see pages 9-15)	Pursuant to the July 2005 Order, the City was required to complete its SSMP no later than August 31, 2008. Pursuant to the Sanitary Sewer Order, the City was required to present its final SSMP to its governing board for approval by August 2, 2009. The City certified completion of its SSMP (see Attachment G) in CIWQS on August 1, 2009, and it has not presented its SSMP to its governing board for approval. In addition, the City has not made a copy of its SSMP publicly available. Furthermore, the inspection revealed that the individual SSMP elements have not been completed pursuant to the requirements dictated in the Sanitary Sewer Order. Many of the SSMP elements omit information and contain missing figure and appendix citations such as in sections 3 and 6. The specific SSMP deficiencies are discussed below.
8) <i>The City failed to include all of the information required of the "Organization" SSMP element.</i>	Provision D.13(ii) of Sanitary Sewer Order (see page 10)	The City's SSMP did not identify the names and telephone numbers for the management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP.

# 1.4 Common Violations (sample 13267 Investigative Order)

## B. REQUIRED CONTENTS OF TECHNICAL REPORT

The Discharger is hereby required to submit the following information for each of the two SSO events reported in Section #4 above:

### 1. Causes and Circumstances of the Unauthorized Discharge of Untreated Sewage:

- a. A complete, detailed explanation of **how and when the discharge of untreated sewage from the Discharger's sewer collection system was discovered**.
- b. A **diagram** showing the location of the actual sewage overflows, including, but not limited to, the location of the influent pump, location of impacted waters, and discharge location(s) from sewer lines, laterals and connections, cleanouts, sewer relief valves, or other assets owned by the Discharger. This should include discharge location(s) from all known assets not owned or operated by the Discharger but affected by the SSO event.
- c. A **detailed report of the total volume of untreated sewage discharged**, including the engineering method(s), diagram(s), model(s), reference(s), calculation(s) and assumption(s) used in estimating the total volume of untreated sewage discharged. This should include, at a minimum, tabular and graphical summaries of total sewage flows collected and/or pumped from pump stations one week before and one week after the SSO event. Additionally, submit daily flows of untreated sewage received by the treatment plant for the past three years. Electronic data (Microsoft excel files) may be submitted in lieu of print copies.
- d. A **detailed description of the cause(s) and/or failure(s)** of equipment/devices/pipelines that lead to the SSO, including any analyses or forensic studies performed by the Discharger or its consultants to determine reasons for the failure(s) of equipment/devices/pipelines.

### 2. Discharger's Response to the Unauthorized Discharge of Untreated Sewage:

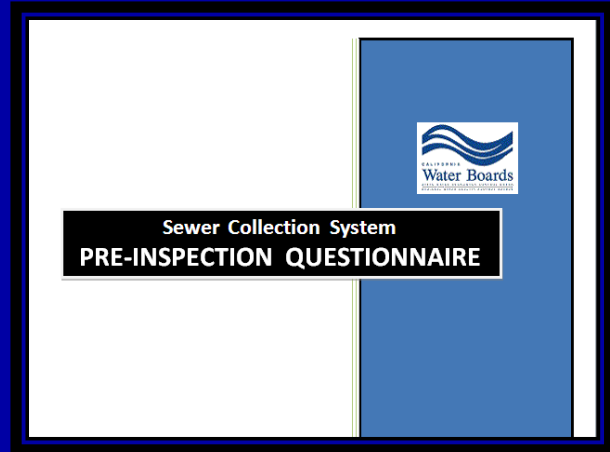
- a. A **detailed chronological description of all actions taken by the Discharger to terminate the discharge, diversion of sewage flows, including any bypass, and mitigate the impacts from the discharge**. The narrative description must include an evaluation of the results of these actions.
- b. A copy of the Discharger's Approved and Certified Sanitary Sewer Management Plan (SSMP), including evidence of Discharger's Board approval, prepared in accordance with the SSSWDRs. Please describe **how emergency response procedures supported by the Discharger's Overflow Emergency Response Plan were implemented during the mitigation and response activities associated with the SSO event, including any suggested changes planned to improve the plan as a result of the SSO events**.
- c. A detailed description of the **final corrective action(s)**, including an update of the status of the final repair, documentation of associated costs involved in the project, sources of funding for the project, and plans and specifications for the repair. This should include the status update of the Discharger's proposed actions stated in Section #5 above for the April 18, 2011 SSO event.

## 1.4 Common Areas of Concern

- Failure to implement SSMP goals, objectives, and strategies
- Failure to keep SSMP current
- Lack of procedures/protocols to ensure quality SSO data collection, reporting, and error-free certification

## 1.4 Common Areas of Concern

- Inadequate external communication with upstream/downstream collection system(s)
- Inadequate internal coordination between O&M and engineering (review and approval of sewer capital projects, maintenance, rehab, repairs, etc.)
- Failure of enrollee to review SSO data submitted and utilize information (CCTV data, field reports, etc.) to demonstrate program effectiveness



## 1.5 Systems Most Likely to be Inspected





## 1.5 Systems Most Likely to be Inspected

- Inspections conducted not random
- Target systems failing to: enroll, comply with reporting requirements, and certify/implement an adequate SSMP
- Target systems with suspect reporting, including those reporting few spills or none
- Inspect based on follow-up review of “Pre-Inspection Questionnaire” or other data submitted to Water Boards

## 1.5 Systems Most Likely to be Inspected

- Target systems reporting high volume and/or chronic SSOs
- Inspect per request by Regional Board
- Inspect in response to complaint received
- Inspect based on other factors

## 1.5 Systems Most Likely to be Inspected

Based on output from Inspection Ranking Model:

- Tool developed by permitting/enforcement staff to prioritize statewide collection system inspections & enforcement
  
- Model Considers factors such as:
  - ✓ Agency SSO risks & threats (system size, population, pipe lengths, etc.)
  - ✓ Agency SSMP compliance history
  - ✓ Agency SSO reporting history
  - ✓ Agency Questionnaire compliance
  - ✓ Agency SSOs & “No Spill Certification” metrics
    - Data “normalized” to capture outliers (high/low)

## **1.6 2012 Inspection Commitments**

## 1.6 CY 2012 Inspection Commitments

- ~30 site inspections (mostly unannounced)
- ~50 “records audits” (utilizing “Pre-Inspection Questionnaires” to verify adequacy of Enrollee sewer program and compliance with SSSWDRs)
- Statewide coverage

# Question Break

# PART 2 - DETAILS

## 2.1 Areas Likely to be Checked

- Records** to verify accuracy of data certified by LRO(s)
  - Hard copies, electronic records (including CMMS data if used)
  - Historic customer call-ins and call-outs
  - Crew logs and field documentation

10/12/2010 11:15

Manhole check list

10-27-20

K8-6, 9, 32 Jackson + Cisterton, 1048 Jefferson  
 K8-37 Lincoln + Buschenridg  
 N10-15, 17 Homestead to Anselcliff  
 N9-2 Aloha at Jackson  
 K10-1, 4 Namu's + Food 4 Less  
 Q9-10 Burgess  
 P8-14 N8-17 Ashmount  
 P9-10 Marahan Ct  
 P9-12 Armstrong Ct  
 K7-1 1800 Wallbridge  
 K8-27, 28 Brookridge to RR Tracks  
 N7-20 El Corito  
 N7-6 Valerie  
 N9-10 Manich to RR (Flying A)  
 P8-30 37+29+24 (Aosta Ave)

siphon lines  
 Adobe To State Sparrow Ct 68 + 69  
 Ellison Apt  
 rake on Rumosa  
 David gate siphon  
 Forward overhead  
 R045 North + West from library  
 East side of James to RR  
 7/8 way (N9-24 + 25)



## 2.1 Areas Likely to be Checked

- Sewer System Management Plan (SSMP) implementation
- Specific examples:
  - ✓ Procedures used to ensure staff/contractors follow OERP: D.13(vi)(d)
  - ✓ Process used to maintain up-to-date map of the sewer system: D.13(iv)(a)
  - ✓ Process used to evaluate service area for Fats, Oils, and Grease (FOG) control program: D.13(vii)
  - ✓ Section of sewers causing SSOs due to insufficient capacity: D.13(viii)

## 2.1 Areas Likely to be Checked

- Work Service Orders, maintenance and related records
- Available records to justify SSO volumetric estimates certified by Enrollee in CIWQS (e.g., flow data, SCADA records, pump data, etc)
- Staff training records
- Agency financial information
- Logbooks (incoming complaints, maintenance activities, etc.)
- Other records

## 2.1 Areas Likely to be Checked

- **Standard Operating Procedures (SOPs)** for asset inspections and maintenance activities (pump station checks, force main air valve inspections/O&M, backup generator exercising, pump station high level alarm testing, etc.)
- Agency **SSO Emergency Operating Procedures (EOPs)** and Overflow Emergency Response Plan and usage during SSOs
- Other procedures to eliminate/reduce SSOs and their impacts
- Procedures to ensure only authorized representatives certify data in CIWQS

## 2.1 Areas Likely to be Checked (Assets)

- Assets posing highest risks/threats for SSOs
  - Lift/pumping facilities
  - Force main systems
  - Other assets
- Assets located at problem sites and/or former SSO locations (pump stations, mainlines, manholes, laterals, etc.)



## 2.1 Areas Likely to be Checked

Example: inspection of pump station, located adjacent to storm drain inlet and a major waterway (State Water Project Canal)



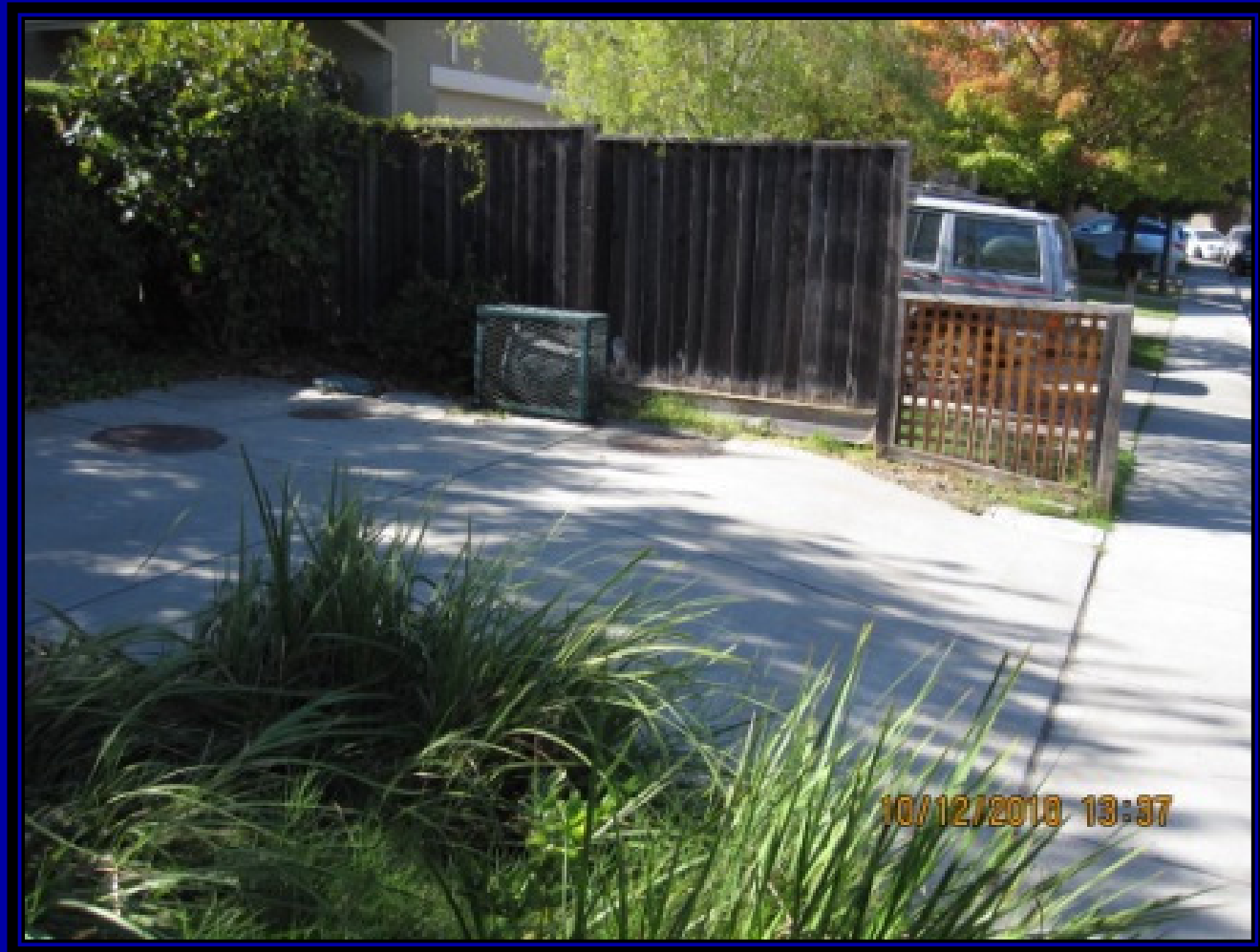
## 2.1 Areas Likely to be Checked



Example: inspection of lift station in previous slide; wet well had evidence of substantial corrosion and accumulation of solids.

## 2.1 Areas Likely to be Checked

Example:  
inspection of  
pump station  
located in  
major  
residential  
subdivision



## 2.1 Areas Likely to be Checked



Example:  
inspection of  
large pump  
station,  
operated  
adjacent to  
waterway  
leading to SF  
bay

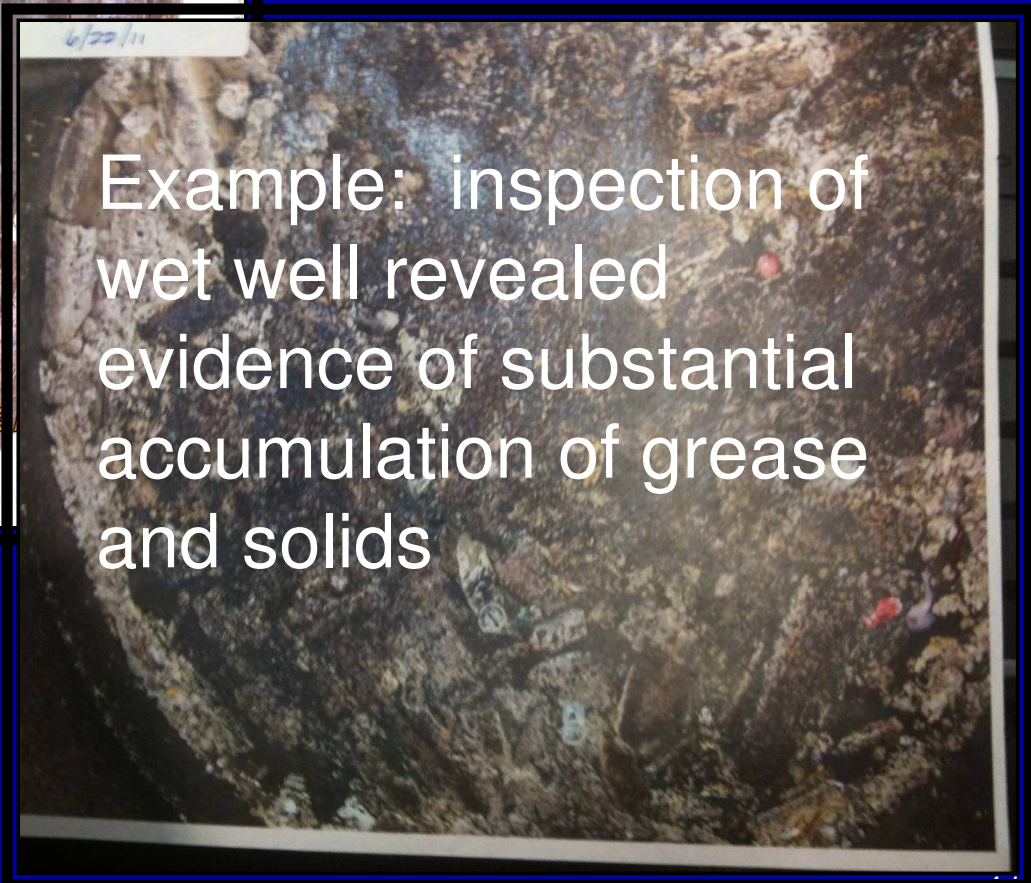


## 2.1 Areas Likely to be Checked



6/22/11

Example: inspection of wet well revealed evidence of substantial accumulation of grease and solids



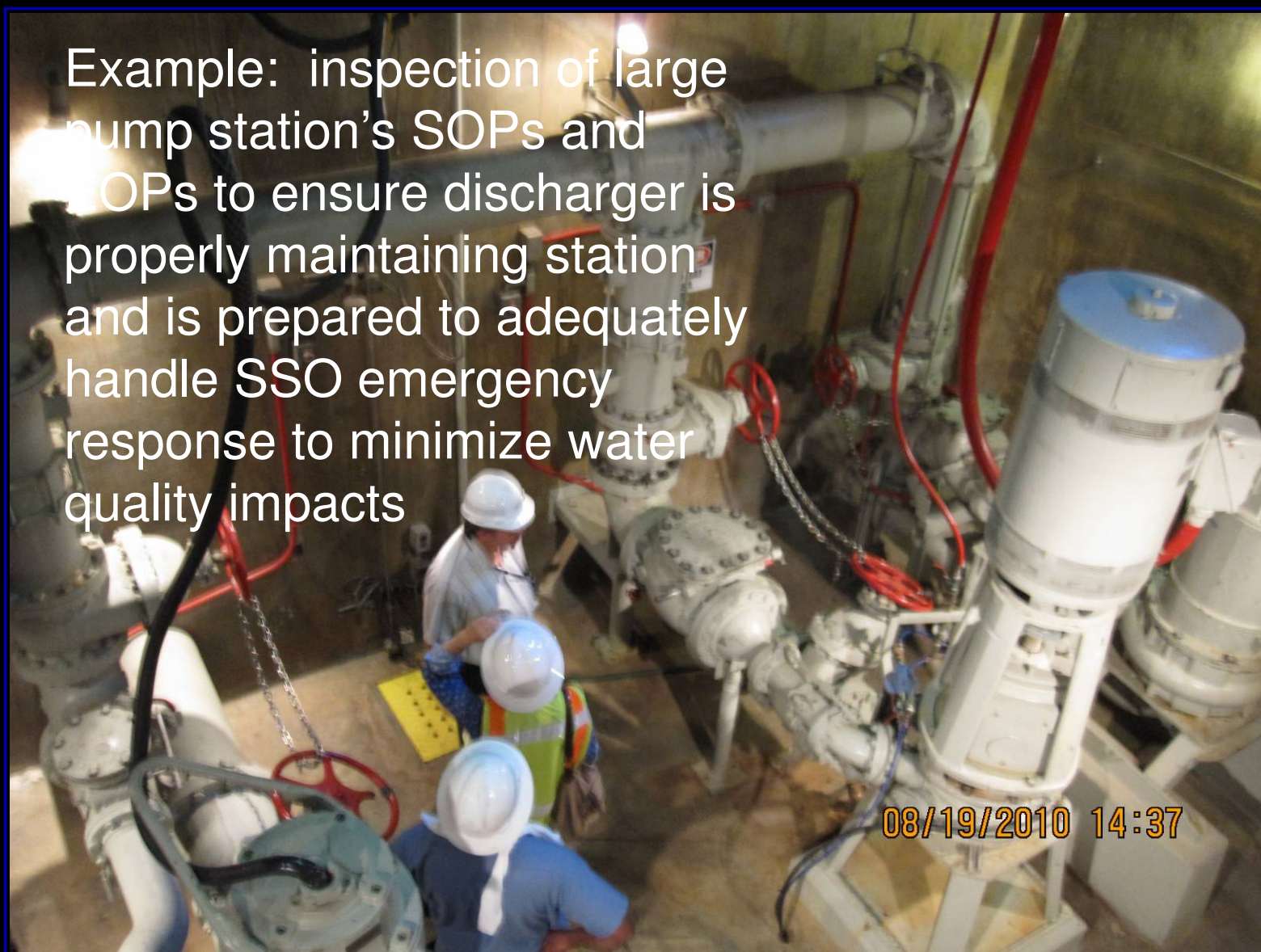
## 2.1 Areas Likely to be Checked

Example: inspection of major pump station's lowest upstream manhole, located in a large public park next to Sacramento River

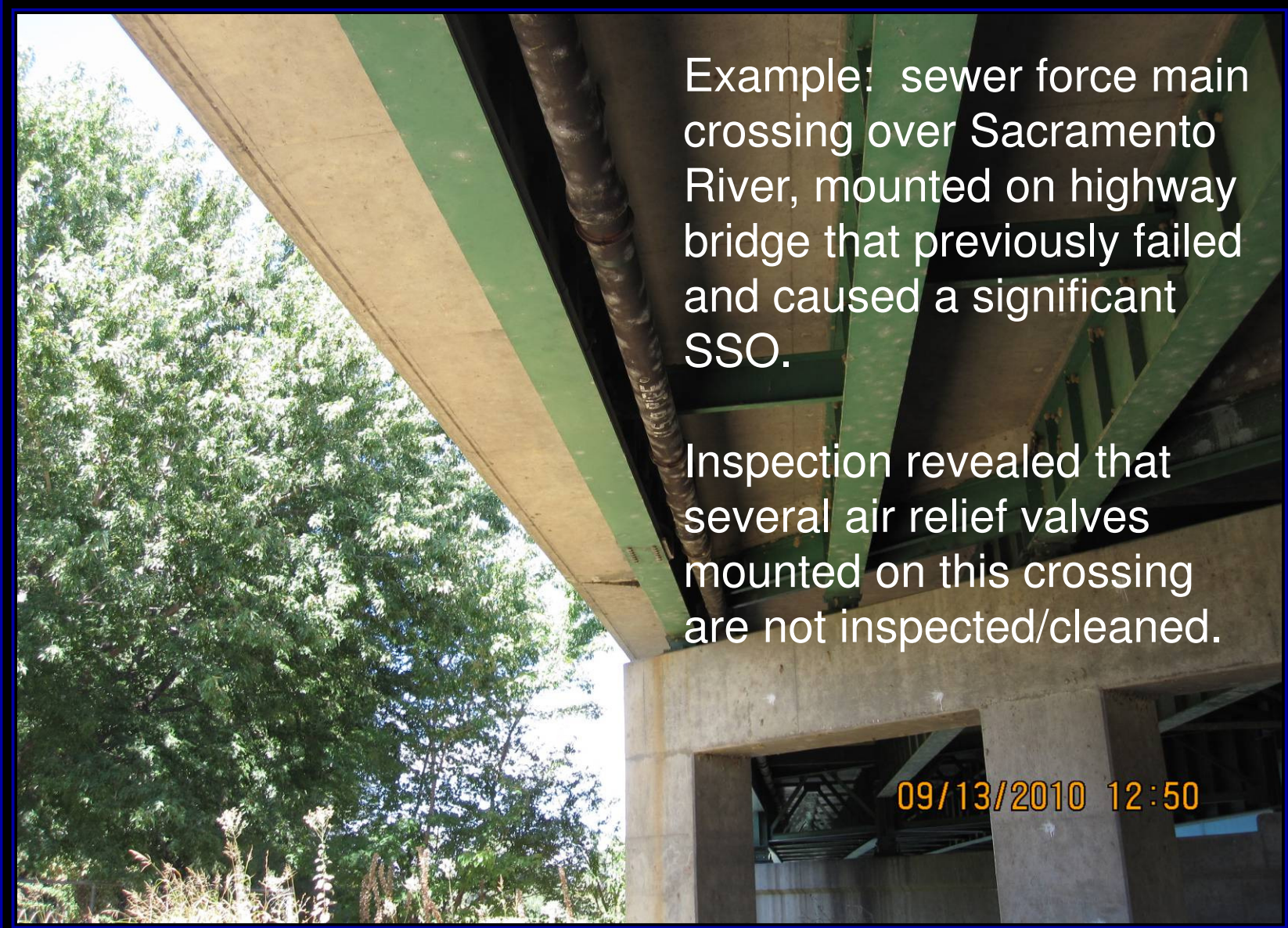


## 2.1 Areas Likely to be Checked

Example: inspection of large pump station's SOPs and SOPs to ensure discharger is properly maintaining station and is prepared to adequately handle SSO emergency response to minimize water quality impacts



## 2.1 Areas Likely to be Checked



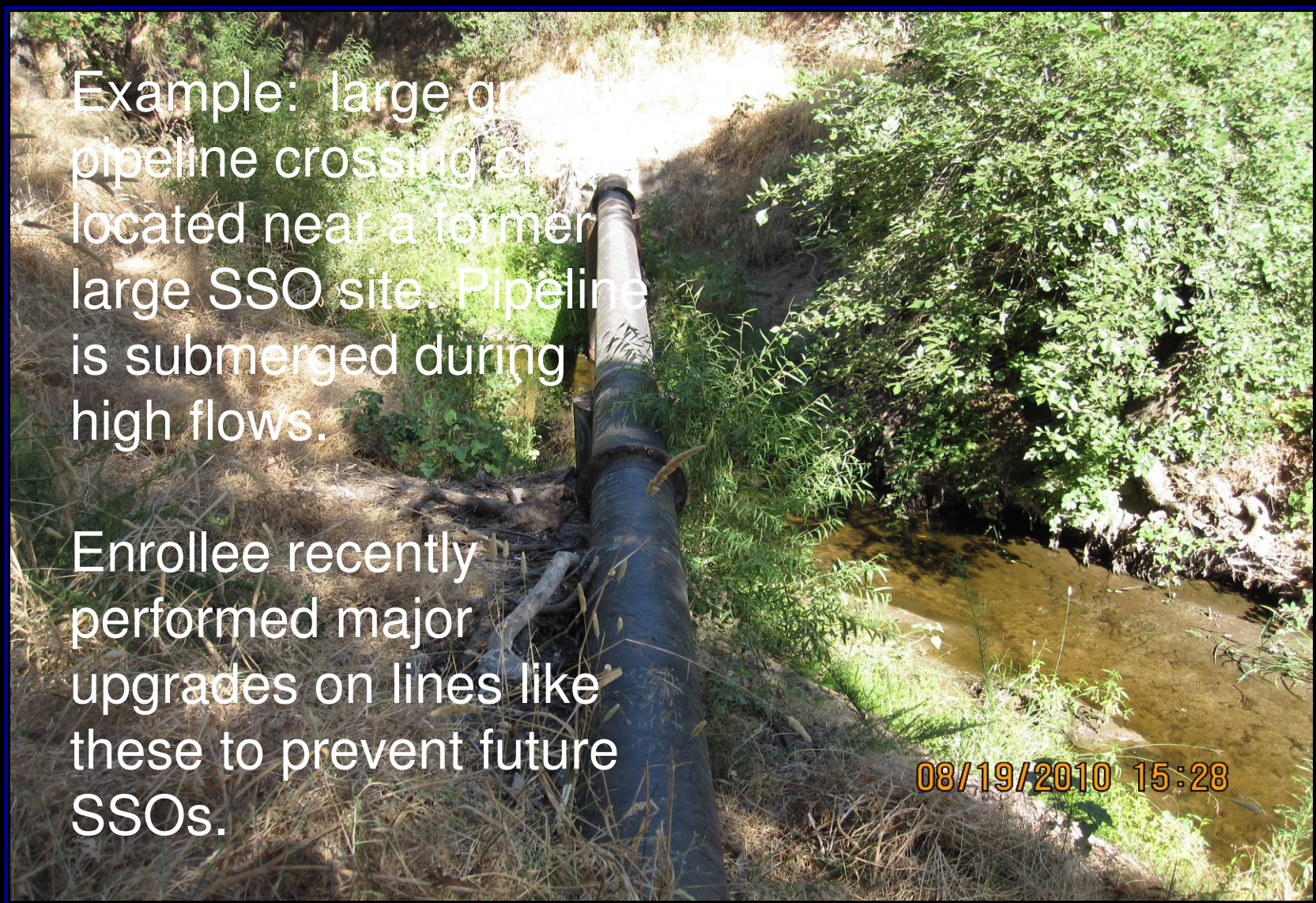
Example: sewer force main crossing over Sacramento River, mounted on highway bridge that previously failed and caused a significant SSO.

Inspection revealed that several air relief valves mounted on this crossing are not inspected/cleaned.

## 2.1 Areas Likely to be Checked

Example: large gravity pipeline crossing creek located near a former large SSO site. Pipeline is submerged during high flows.

Enrollee recently performed major upgrades on lines like these to prevent future SSOs.



## 2.1 Areas Likely to be Checked

- Sewer equipment, vehicles, SOPs
- SSO emergency/backup equipment and crew knowledge and experience with using the equipment
- Equipment repair manifests/logs
- Spare parts inventories
- Other equipment

## 2.1 Areas Likely to be Checked

- Adequacy of agency actual SSMP implementation
- Familiarity with the SSSWDRs, Amended MRP and SSMP (see section E. requirements on page 17 of permit)
- Adequacy of field records and data collection activities to ensure compliance with Amended MRP
- Competency with agency O&M and emergency response activities [see sections D.13(iv)(d) and D.13(vi)(d)]
- Interview field crews to cross check information discussed with management

## **2.2 Post-Inspection Follow-Up**



## 2.2 Post-Inspection Follow-up

- Post-Inspection Briefing
  - ✓ At time of inspection or later, depending on schedule
- Possible follow-up enforcement action

# Question Break

Regional Water Quality Control Board  
San Francisco Bay Region

1515 Clay Street, Suite 1400, Oakland, California 94612  
Phone (510) 622-2300 FAX (510) 622-2460  
<http://www.waterboards.ca.gov/sanfranciscobay>

January 3, 2011  
CIWQS ID No.

## 2.3 SSO Enforcement Response Summary

Subject: Notice of Violation of State Water Resources Control Board Order No. 2006-0003-DWQ, City of

The [redacted] is **in violation** of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, established in State Water Resources Control Board (State Water Board) Order No. 2006-0003-DWQ (Order), and has violated California Water Code (CWC) sections 13350 and 13383. Please respond within 60 days of the date of this notice with a letter that states the City has addressed its deficiencies in reporting sanitary sewer overflow (SSO) duration and volume.

[redacted] operates a sanitary sewer system under the Order, which the State Water Board [redacted] the City signed a Notice of Intent to comply with the terms [redacted]

## 2.3 SSO Enforcement Response Summary

### 1. Onsite Inspections:

All sites required to complete “Pre-Inspection Questionnaire”

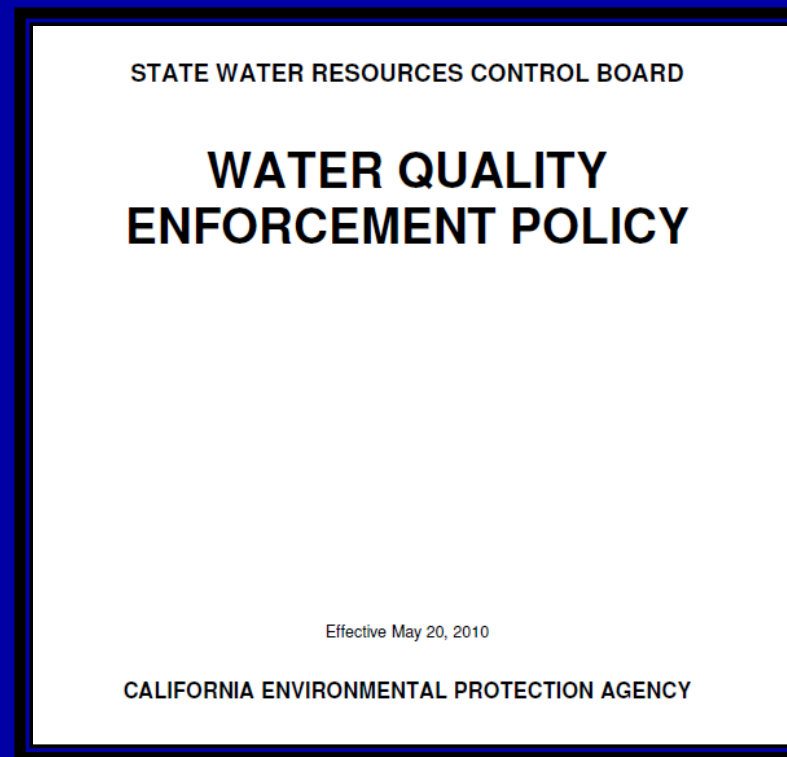
### 2. Notices of Violation (NOV)

### 3. Formal Enforcement Cases in Progress

- a. Enrolled but not participating in program (14 cases pending)
- b. False “No Spill” reports/failure to report SSOs (4 cases pending)
- c. Large SSOs (4 active cases pending)
- d. SSMP violations (140+ NOVs sent; follow-up referrals pending)
- e. Failure to enroll for coverage (several cases pending)

## 2.3 SSO Enforcement Response Summary

- Formal enforcement actions for SSOs must follow “Water Quality Enforcement Policy” (11/2009)



Available at: [http://www.waterboards.ca.gov/water\\_issues/programs/enforcement/docs/enf\\_policy\\_final111709.pdf](http://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/enf_policy_final111709.pdf)

## 2.3 Enforcement Response Summary

### 1. CY 2011 Actions

CWC Section 13267 Orders Issued = **40+**

Administrative Civil Liability (ACL) Penalties  
Assessed/Completed = **~\$4M**

## **2.5 Tips on Being Prepared**

## 2.5 Tips on Being Prepared

1. Quarterly review (at minimum) of SSSWDRs, Amended MRP, and agency's SSMP
2. Quarterly review (at minimum) to check accuracy of all data certified by your LRO in CIWQS
3. Quarterly review (at minimum) of required records to be maintained by agency (see Amended MRP, section B on page 5)



## 2.5 Tips on Being Prepared

4. Maintain all related files and information to demonstrate HOW agency is implementing its approved SSMP
5. Complete “Pre-Inspection Questionnaire” developed by State Water Board, Office of Enforcement
6. Call SSO Program Managers or the Office of Enforcement if you have questions!

# 2.3 Tips on Being Prepared



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## **2.6 Reminder: SSMP Self Audit Requirements**

## 2.6 Reminder: SSMP Self Audit Requirement (see Section D.13(x) of SSSWDRs)

- ✓ Self Audits required every 2 years
- ✓ Must measure effectiveness of SSMP
- ✓ Must verify Enrollee compliance with SSMP elements



Available for download at: [http://bacwa.org/Portals/0/BACWA\\_SSMP%20Audits\\_OE\\_ppt-12-08-11.pdf](http://bacwa.org/Portals/0/BACWA_SSMP%20Audits_OE_ppt-12-08-11.pdf)

# Program Contacts & Info

**Russell Norman, P.E.**  
SSO Program Lead  
State Water Resources Control Board  
[rnorman@waterboards.ca.gov](mailto:rnorman@waterboards.ca.gov)  
(916) 323-5598

**Victor Lopez**  
SSO Program Lead  
State Water Resources Control Board  
[vlopez@waterboards.ca.gov](mailto:vlopez@waterboards.ca.gov)  
(916) 323-5511

**Jim Fischer, P.E.**  
Special Investigations Unit  
Office of Enforcement  
State Water Resources Control Board  
[jfischer@waterboards.ca.gov](mailto:jfischer@waterboards.ca.gov)  
(916) 341-5548

**Julie Berrey**  
Special Investigations Unit  
Office of Enforcement  
State Water Resources Control Board  
[jberrey@waterboards.ca.gov](mailto:jberrey@waterboards.ca.gov)  
(916) 341-5872

## SSO Main Website:

[http://www.waterboards.ca.gov/water\\_issues/programs/sso/index.shtml](http://www.waterboards.ca.gov/water_issues/programs/sso/index.shtml)

## List Serve Sign-Up:

[http://www.waterboards.ca.gov/resources/email\\_subscriptions/swrcb\\_subscribe.shtml](http://www.waterboards.ca.gov/resources/email_subscriptions/swrcb_subscribe.shtml)