

COLLECTION SYSTEM REGULATIONS

What is New?

Where Do We Stand?

**PROPOSED
CHANGES TO THE
MONITORING AND
REPORTING
PROGRAM**

What is the (MRP) Monitoring and Reporting Program?

- ▣ Part of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. SWRCB Order Number 2006-0003 DWQ
- ▣ Released in May 2006
- ▣ Established spill categories (Cat 1 & Cat 2)
- ▣ Established spill reporting procedures
- ▣ Established record keeping requirements

Brief History of Recent Collection System Regulations

- ▣ Prior to 1996
 - Collection System regulations almost non-existent
 - Most Regions spill reporting threshold was spills of 1,000 gallons or greater
 - ▣ Smaller spills non-reportable
 - ▣ Enforcement varied by Region
- ▣ After 1996
 - Region 9 became the most aggressive with Order 96-04

Brief History of Recent Collection System Regulations

- ▣ May 1996 San Diego Regional Board adopts Order 96-04
- ▣ 96-04 was the most aggressive regulation for the prevention of SSOs in the state
- ▣ 96-04 prohibits any discharge of sewage prior to the treatment plant headworks
- ▣ 96-04 requires a written SSO Prevention Plan
- ▣ 96-04 requires a written SSO Response Plan

Brief History of Recent Collection System Regulations

- ▣ Huntington Beach – Summer 1999 - 2000
 - Multiple beach closures during the summer season due to high bacteria levels
 - Negative impact on local business
 - Source of bacteria was not known
 - ▣ City was blamed
 - Jail for City Council members; Inadequate system O&M; Oranges released for flow patterns
 - ▣ OCSD was blamed – outfall questioned
 - ▣ Basically a witch hunt in the local newspapers
 - ▣ Health department thresholds

Brief History of Recent Collection System Regulations

- ▣ Huntington Beach – Summer 1999 – 2000
 - Incident caught the attention of state and federal regulators
- ▣ Federal EPA wanted to impose a cMOM program on the western Region 8 sewer agencies
 - Modeled after programs in USEPA Region 4
- ▣ Region 8 wanted to develop their own program
 - OCSD and its member agencies worked with Region 8 staff to develop a workable spill prevention program

Brief History of Recent Collection System Regulations

- ▣ Region 8 wanted to develop its own program
 - May of 2002 Region 8 released their WDR for collection systems in western Orange County
 - Program implementation was staggered over several years
 - ▣ New elements were introduced approximately every 6 months
 - Program was very successful in reducing SSOs and their impact on the environment
 - Program was very similar to the current statewide WDR program
 - ▣ Used as a model for the statewide program

Brief History of Recent Collection System Regulations

- ▣ In May 2006 the SWRCB released their Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems
 - Paterned after Region 8 WDR
 - Developed in cooperation with SWRCB and statewide stake holders – Committee approach
- ▣ Implementation was based upon population served
 - Full implementation was achieved by August 2010
 - ▣ Systems serving populations less than 2,500 were the last to achieve full compliance

Brief History of Recent Collection System Regulations

- ▣ In February 2008 the SWRCB made its first revision to the MRP
 - Prompted by a large spill into the San Francisco Bay
- ▣ Revision required:
 - 2-Hour notification to health care; Office of Emergency Services (OES) and the local RWQCB
 - 24-hour certification to the RWQCB that notifications had been completed

Brief History of Recent Collection System Regulations

- ▣ In March 2011 SWRCB staff released draft revisions to both the WDR and MRP
 - Revisions were extensive and more restrictive than the original Order
 - Stakeholders objected stating that the revisions were too soon after full implementation of the Order
 - Board agreed that more time should be given to prove the effectiveness of the original program

Brief History of Recent Collection System Regulations

- ▣ In August 2012 stakeholder meetings were held in both Northern and Southern California to discuss revisions to the MRP
- ▣ November of 2012 a draft MRP was released (approximately 27 pages) including sections on Notification, Reporting, Monitoring & Record Keeping; Collection System Questionnaire; SSMP Program Audits

Brief History of Recent Collection System Regulations

- ▣ In January 2013 the current revisions to the MRP were released (approximately 12 pages)
- ▣ Most notably absent:
 - Appendix on Questionnaire Requirements
 - Appendix on SSMP Program Audits

What is in the Current Proposed Draft Monitoring and Reporting Program?

****DISCLAIMER****

The following information is based upon the most recent draft MRP released by the SWRCB in January 2012. It does not address any changes that might have occurred during the comment period for the current draft nor any decisions or changes that may have been made by the SWRCB after the current draft was issued.

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Program becomes “Event” based instead of “Location” based
 - Currently a separate spill report is required for each appearance point of a spill even if it is the same spill event
 - Proposed MRP allows for multiple appearance points in one spill report as long as it is from the same spill event

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Revised spill categories
 - Category 1
 - Category 2
 - Category 3
 - Private Lateral Sewage Discharge (PLSD)
- ▣ SSO Technical Report Requirement
- ▣ No spill report requirement
- ▣ Annual Collection System Questionnaire requirement

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Category 1 Spill
 - Any volume of untreated or partially treated wastewater from the collection system that:
 - ▣ Reaches surface water or a drainage channel that is tributary to surface water: or
 - ▣ Reaches a separate municipal storm water system and is not FULLY recovered
 - Any volume not recovered is considered to have reached surface water unless the storm drain discharges to a dedicated ground water infiltration basin etc.
 - ▣ Note: Surface waters not waters of the state

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Category 2 Spill
 - Discharges of untreated or partially treated wastewater that are 1,000 gallons or greater and do not reach surface water, drainage channel or storm drain unless the entire SSO is FULLY captured and returned to the collection system

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Category 3 Spill
 - All other discharges of untreated or partially treated wastewater from the collection system

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Private Lateral Sewage Discharge (PLSD)
 - PLSDs are discharges from private sewage systems that are connected to the public system
 - PLSDs that the public agency becomes aware may be voluntarily reported (Except Region 9)
- ▣ Note: A sewage spill that appears on private property but is caused by a defect in the public system and not the private system is a reportable spill

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ SSO Technical Report (new requirement)
 - An SSO Technical Report is required for any spill which 50,000 gallons or greater
 - Reaches the waters of the state and
 - Is not recovered
- ▣ SSO Technical Report includes
 - Causes and circumstances of the SSO
 - Enrollee's Response to the SSO
 - Monitoring and Analysis of the SSO
 - Impacts of the SSO

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Notification Requirements
 - Cal EMA must be notified within 2 hours of the discharger becoming aware of any Category 1 SSO that is equal to or greater than 1,000 gallons
 - Telephone notification

What is in the Current Proposed Draft Monitoring and Reporting Program?

▣ Reporting Requirements

■ Category 1 SSO

- ▣ Draft report within 3 business days of becoming aware of the spill
- ▣ Certified (LRO) within 15 calendar days of the SSO end date

■ Category 2 SSO

- ▣ Draft report within 3 business days of becoming aware of the spill
- ▣ Certified within 15 calendar days of the SSO end date

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Reporting Requirements
 - Category 3 SSO
 - ▣ Certified report within 30 calendar days of the end of the month in which the spill occurred
 - Technical Report
 - ▣ Within 45 calendar days after any Category 1 SSO of which 50,000 gallons or greater is not recovered from the waters of the state
 - No Spill Monthly Report
 - ▣ Certify that no spills occurred within 30 calendar days of the month in which no spills occurred
 - ▣ Does not include reported PLSDs

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Reporting Requirements
 - Reporting of PLSDs is not required (except Region 9) but are strongly encouraged by the SWRCB
 - Collection System Questionnaire
 - ▣ Update and certify every 12 months
 - ▣ Note: Failure to update the Annual Collection System Questionnaire may not allow an enrollee to submit reports to CIWQS

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Ammending spill reports
 - Currently there are no time limits on ammending certified spill reports
 - The proposed MRP revisions limit the revising of certified spill reports to 120 days from the SSO end time
 - Spill reports made prior to the revised MRP adoption can be revised up to 120 days of the MRP adoption date

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Water Quality Monitoring
 - Develop Water Quality Monitoring Program for large unrecovered SSOs to waters of the state
 - Analysis to be performed by an accredited or certified laboratory
 - Assess initial impacts of SSOs of 50,000 gallons or greater that are not recovered within 48 hours of becoming aware of the SSO
 - Sampling at a minimum for pH, temp, DO, ammonia & appropriate bacteria
 - Completion of impact assessment within 120 days of SSO end time

What is in the Current Proposed Draft Monitoring and Reporting Program?

▣ SSMP Availability

- An electronic copy of the SSMP including proof of governing board approval must be posted online or submitted to the SWRCB for posting
- Electronic copies of the SSMP must be posted or submitted each time the SSMP is recertified
- Electric copies of the SSMP Self Audits are to be posted online or submitted to the SWRCB

What is in the Current Proposed Draft Monitoring and Reporting Program?

- ▣ Record Keeping
 - Records must be kept a minimum of 5 years and be available for SWRCB review upon request
 - General records
 - ▣ Document compliance with WDR and MRP includes records of the enrollee's contract operator(s)
 - SSO Records
 - ▣ Photographic records that support spill volume estimates
 - ▣ Complaints including how the enrollee responds including complaints that did not result in an SSO

THAT'S IT
FOLKS

Questions?