



**SEWER SYSTEM MANAGEMENT PLAN
FOR
CITY OF PLACENTIA**

Volume I

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ABBREVIATIONS / ACRONYMS

AB	Assembly Bill
BAT	Best Available Technology
BC	Brown and Caldwell
BMP	Best Management Practice
CCTV	Closed-Circuit Television
CFR	Code of Federal Regulations
CIP	Capital Improvement Program
CM	Corrective Maintenance
CMMS	Computerized Maintenance Management System
CWEA	California Water Environment Association
ERP	Emergency Response Plan
FOG	Fats, Oils, and Grease
GPS	Global Positioning System
I/I	Inflow / Infiltration
IERP	Integrated Emergency Response Plan
MRP	Monitoring and Reporting Program
O&M	Operation and Maintenance
OCHCA	Orange County Health Care Agency
OCS D	Orange County Sanitation District
OES	Office of Emergency Services
Order	California RWQCB Order No. R8-2002-0014, General WDRs, 4/26/02 (No Revisions)
Pd	Predictive Maintenance
PM	Preventative Maintenance
PMP	Preventative Maintenance Program
R&R	Rehabilitation and Replacement
RWQCB	Regional Water Quality Control Board
SOP	Standard Operating Procedure <u>or</u> Standard Maintenance Procedure
SSO	Sanitary Sewer Overflow and any sewer spill or overflow of sewage
SSMP	Sewer System Management Plan
WDR	Waste Discharge Requirements
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

This Sewer System Management Plan (SSMP) addresses the prevention and cleanup of sanitary sewer overflows (SSOs). All sewage collection agencies in Orange County's Santa Ana Region are required to comply with the "California Regional Water Quality Board (RWQCB), Santa Ana Region, Order No. R8-2002-0014" (Order) on General Waste Discharge Requirements. The purpose of the Order is to prevent SSOs, and to provide a plan and schedule for measures to be implemented to prevent SSOs, as well as measures to effectively clean up and report the spills.

The Order requires that we properly fund, manage, operate, and maintain the sewage collection system for which we are responsible. We must use trained staff (and/or contractors) possessing adequate knowledge, skills, and abilities to complete necessary collection system work. We also must demonstrate preparation of these staff through a validated program.

The essence of this Order is as follows:

- This agency must proactively manage the systems they operate in a way that prevents spills.
- In the event of a spill, lack of funds, failure to acquire information that could have been collected, failure to apply the latest in technology, poorly trained staff, or ignorance are no defense.
- We must fully comply with this Order, and failures could bring about RWQCB action, regardless of whether or not a spill has occurred.

This SSMP report is organized to correspond to the sections of the Order. The report consists of 13 chapters. In general, each chapter begins with a summary of Order requirements, followed by these subsections:

- Compliance Summary – A description of how compliance was achieved
- Compliance Documents – A listing of source documents that support compliance and their locations
- Roles and Responsibilities – A listing of relevant staff roles and responsibilities

CHAPTER 1 – PROHIBITIONS AND PROVISIONS

This chapter describes the sewage discharge prohibitions and twelve provisions prescribed in the Order.

1.1 Prohibitions

To meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, the discharger is required to comply with the following prohibitions:

- The discharge of untreated sewage to any surface water stream, natural or manmade, or to any drainage system intended to convey stormwater runoff to surface water streams, is prohibited.
- The discharge of chlorine, or any other toxic substance used for disinfection and cleanup of sewage spills, to any surface water body is prohibited. (This prohibition does not apply to the chlorine in the potable water used for final wash down and clean up of sewage spills.)

In any enforcement action, the Regional Board will consider the efforts of the discharger to contain, control, and clean up sewage spills from its collection system as part of its consideration of the factors required by Section 13327 of the California Water Code. The discharger will make every effort to contain sewage spilled from its collection systems and prevent the sewage from entering storm drains and surface water bodies. The discharger will also make every effort to prevent sewage from discharging from storm drains into flood control channels and open ditches by blocking the storm drainage system and by removing the sewage from the storm drains. The use of the storm drain pipe system to contain the sewage by blocking the drain pipes, and recovering and cleaning up the spilled sewage, in order to prevent the sewage from being discharged to a surface water body, is not a violation of the first prohibition listed above.

1.2 Provisions

The discharger must meet the following twelve provisions:

1. The discharger must comply with all conditions in the Order. Any noncompliance with the Order constitutes a violation of the California Water Code and is grounds for enforcement action.
2. Discharges Caused by Severe Natural Conditions – The Regional Board may take enforcement action against the permittee for any sanitary sewer system discharge caused by natural conditions, unless the permittee demonstrates through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. The discharge was caused by severe natural conditions (such as hurricanes, tornadoes, flooding, earthquakes, tsunamis, and other similar natural conditions); and
 - b. There were no feasible alternatives to the discharge, such as retention of untreated wastewater, reduction of inflow and infiltration, use of adequate

backup equipment, or an increase in the capacity of the system. This provision is not satisfied if, in the exercise of reasonable engineering judgment, at the time that the facilities were planned, the discharger should have installed auxiliary or additional collection system components, wastewater retention, adequate backup equipment, or should have reduced inflow and infiltration. This provision is also not satisfied if the agency does not undergo a periodic or continuing planning process to identify and correct problems.

3. Discharges Caused by Other Factors – For SSOs other than those covered under these provisions, the permittee may establish an affirmative defense to an action brought for noncompliance if the discharger demonstrates through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. The permittee can identify the cause or likely cause of the discharge event;
 - b. The discharge was exceptional, unintentional, temporary, and caused by factors beyond the reasonable control of the permittee;
 - c. The discharge could not have been prevented by the exercise of reasonable control, such as proper management, operation and maintenance, adequate treatment facilities at OCSD's two regional treatment plants or collection system facilities or components (e.g., adequately enlarging treatment or collection facilities to accommodate growth or adequately controlling and preventing infiltration and inflow); preventive maintenance; or installation of adequate backup equipment; and
 - d. The permittee took all reasonable steps to stop, and mitigate the impact of, the discharge as soon as possible.
4. Burden of Proof – In any enforcement proceeding, the permittee has the burden of proof to establish that the criteria in this section has been met.
5. In an enforcement action, it shall not be a defense for the discharger that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this order.
6. Upon reduction, loss, or failure of the sanitary sewer system resulting in an SSO, the discharger shall, to the extent necessary to maintain compliance with this Order, take any necessary remedial action to 1) control or limit the volume of sewage discharged, 2) terminate the sewage discharge as rapidly as possible, and 3) recover as much of the sewage discharged as possible for proper disposal, including any wash down water. The dischargers shall implement all remedial actions to the extent they may be applicable to the discharge, including the following:
 - a. Interception and rerouting of sewage flows around the sewage line failure;
 - b. Vacuum truck recovery of sanitary sewer overflows and wash down water; and;
 - c. Cleanup of debris of sewage origin at the overflow site.

7. The discharger shall properly fund, manage, operate and maintain, with adequately trained staff and/or contractors possessing adequate knowledge skills and abilities as demonstrated through a validated program at all times, all parts of the sewage collection system owned and/or operated by the discharger.
8. The discharger shall provide adequate capacity to convey base flows and peak flows, including wet weather related events to the minimum design criteria as defined in the discharger's System Evaluation and Capacity Assurance Plan, for all parts of the collection system owned or operated by the discharger.
9. The discharger shall take all feasible steps to stop, and mitigate the impact or, sanitary sewer overflows in portions of the collection system owned or operated by the discharger.
10. The discharger shall provide notification to the OCHCA and the Regional Board so that they can notify parties with a reasonable potential for exposure to pollutants associated with the SSO.
11. The discharger shall develop and implement a written plan, a Sewer System Management Plan (SSMP), for compliance with these waste discharge requirements and make it available to any member of the public upon request in writing.
12. The essential elements of the SSMP are itemized below. If the discharger believes that any element of this section is not appropriate or applicable for their SSMP program, the program does not need to address it, but the SSMP must explain why that element is not applicable. The Regional Board will consider the quality of the SSMP, its implementation and effectiveness in any relevant enforcement action, including, but not limited to, any enforcement action for violation of the Clean Water Act, the Basin Plan prohibition, or these waste discharge requirements:
 - a. The SSMP must include the following components, with the exception of non-applicable components, as discussed above. The chapters of this report are provided under the titles and in the same order.
 - Goals
 - Organization
 - Legal Authority
 - Measures and Activities
 - Design and Performance Provisions
 - Monitoring, Measurement, and Program Modifications
 - Overflow Emergency Response Plan
 - Fats, Oils, and Grease Control Program
 - System Evaluation and Capacity Assurance Plan
 - b. In addition, this report also includes the following three chapters:
 - Program Audits

- Communications
- Compliance Requirements

CHAPTER 2 – GOALS

This chapter describes the goals of the Sewer System Management Plan (SSMP). The City of Placentia is required to comply with the “California Regional Water Quality Board (RWQCB), Santa Ana Region, Order No. R8-2002-0014” (Order) on General Waste Discharge Requirements for Sewage Collection Agencies in Orange County within the Santa Ana Region.

2.1 Purpose

The purpose of the Order is to prevent sanitary sewer overflows (SSOs). We are required to prepare and maintain the SSMP to support this purpose.

The discharger shall properly fund, manage, operate and maintain, with adequately trained staff and/or contractors possessing adequate knowledge skills and abilities as demonstrated through a validated program at all times, all parts of the sewage collection system owned and/or operated by the discharger.

2.2 Goals

The goals of the SSMP are to prevent SSOs, and to provide a plan and schedule for measures to be implemented to prevent SSOs, as well as measures to effectively clean up and report the spills.

As required by the RWQCB, a copy of the Order is maintained at appropriate locations (as discussed in Chapter 13, General Compliance Requirements) and is available to sanitary sewer system operating and maintenance personnel at all times. A copy of the Order is included as Appendix A in Volume II of this SSMP. Pursuant to California Water Code Section 13267(b), we will also comply with the SSO “Monitoring and Reporting Program No. R8-2002-0014” (Monitoring and Reporting Program) and all future revisions, included by reference in the Order. A copy of the Monitoring Program is included in Appendix B of Volume II of this SSMP.

It should be noted that Part 10.d of the Order references California Assembly Bill (AB) 285, which requires statewide consistency in reporting; however, AB 285 is not yet believed to be fully funded by the state, and some provisions may not be applicable.

2.3 About This Document

The City of Placentia has prepared this SSMP to ensure compliance with the Order. Volume I of the SSMP provides a general description of how we comply with the various provisions of the Order and provides references to supporting documents. Volume II of the SSMP contains specific information and support documents. Some support materials, such as large format drawings, relational databases, and voluminous documents may not be physically included in the SSMP. In these cases, a reference will be provided within the SSMP that indicates the type, owner, and location of these support materials.

CHAPTER 3 – DESCRIPTION OF ORGANIZATION

This chapter describes The City of Placentia's organization and chain of communication.

3.1 Administrative and Maintenance Positions

The currently staffed positions are described in this section. The Order requires that the SSMP include the administrative and maintenance positions responsible for implementing measures in the SSMP program, including lines of authority by organization charge or similar document.

3.1.1 Compliance Summary.

The positions described provide sufficient staffing to operate the sewer system on a sustainable basis, and to comply with all requirements of this Order.

Within the City, the Director of Public Works/City Engineer is responsible for the operation and maintenance of the sanitary collection system. Due to the small size of the City's Public Works staff, maintenance and operation of the collection system is performed via outside contract. The Public Works Maintenance Services Superintendent and Maintenance Supervisor, amongst their other duties, assist the Director of Public Works/City Engineer in the oversight of the contracted operations. The Public Works Crew Leader and field crews are the first responders to SSOs. The Crew Leader is also responsible for notifying the appropriate contractor for an emergency response, protection of the City's MS4, traffic control, cleanup assistance and initial notification. The Public Works Maintenance Services Superintendent creates the SSO five-day and monthly summary reports under the signature of the Director of Public Works/City Engineer. The Public Works Maintenance Services Superintendent is also responsible for the implementation of the various aspects of the WDR and review of efficiency of each of the WDR's components. The Maintenance Supervisor oversees the operation of the field crews, including their training, and reports to the Public Works Maintenance Services Superintendent. A City Code Compliance Officer investigates SSOs that are a result of a violation of the City's ordinances for possible legal action. The City's FOG Discharge Reduction Program, overseen by the City's FOG Program Manager, regulates the discharge of fats, oils, and grease (FOG) into the City's collection system.

3.1.2 Compliance Documents.

Detailed organizational charts showing the structure and relationship of all current City positions can be found in Appendix D of Volume II of this SSMP.

3.1.3 Roles and Responsibilities.

The roles and responsibilities of each position in the organization chart are listed here.

City Administrator	Responsible for the day-to-day management and operation of the City under the direction of the City Council.
Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including the operation and

	management of the sanitary collection system. Reports to the City Administrator.
Maintenance Services Superintendent	Responsible for the operation and maintenance activities of the Public Works Department including the sanitary collection system. Reports to the Director of Public Works/City Engineer.
Maintenance Supervisor	Responsible for the oversight of the Public Works Department field service personnel including those crews responsible for the operation and maintenance of the sanitary collection system. Reports to the Maintenance Services Superintendent.
Crew Leader	Responsible for the oversight of the operation and maintenance activities of the sanitary collection system. This includes monitoring of contractors to ensure their operations meet the City's specifications. The Crew Leader also assigns and has oversight for the activities of the field crews. Reports to the Maintenance Supervisor.
Field Crews	Responsible for field operation and maintenance activities of the sanitary collection system. These include: response to SSOs, traffic control, assistance with clean-up and other activities as needed. Reports to the Crew Leader.
Code Compliance Officer	Responds to violations of the City's Municipal Code. Is responsible to enforce the City's Municipal Code relative to private property spills that enter the public right of way or incidents where a private property owner causes or contributes to an SSO within the City's collection system including violations of the City's FOG ordinance. Reports to the City's FOG Control Program Manager and the Director of Public Works/City Engineer.
FOG Control Program Manager	Responsible for the implementation, administration and management of the City's FOG Control Program. Reports to the Director of Public Works/City Engineer.
Management Analyst	Responsible for assisting in the development and implementation of the City's WDR programs. Also responsible for the review and revision of these programs.

3.2 Chain of Communication

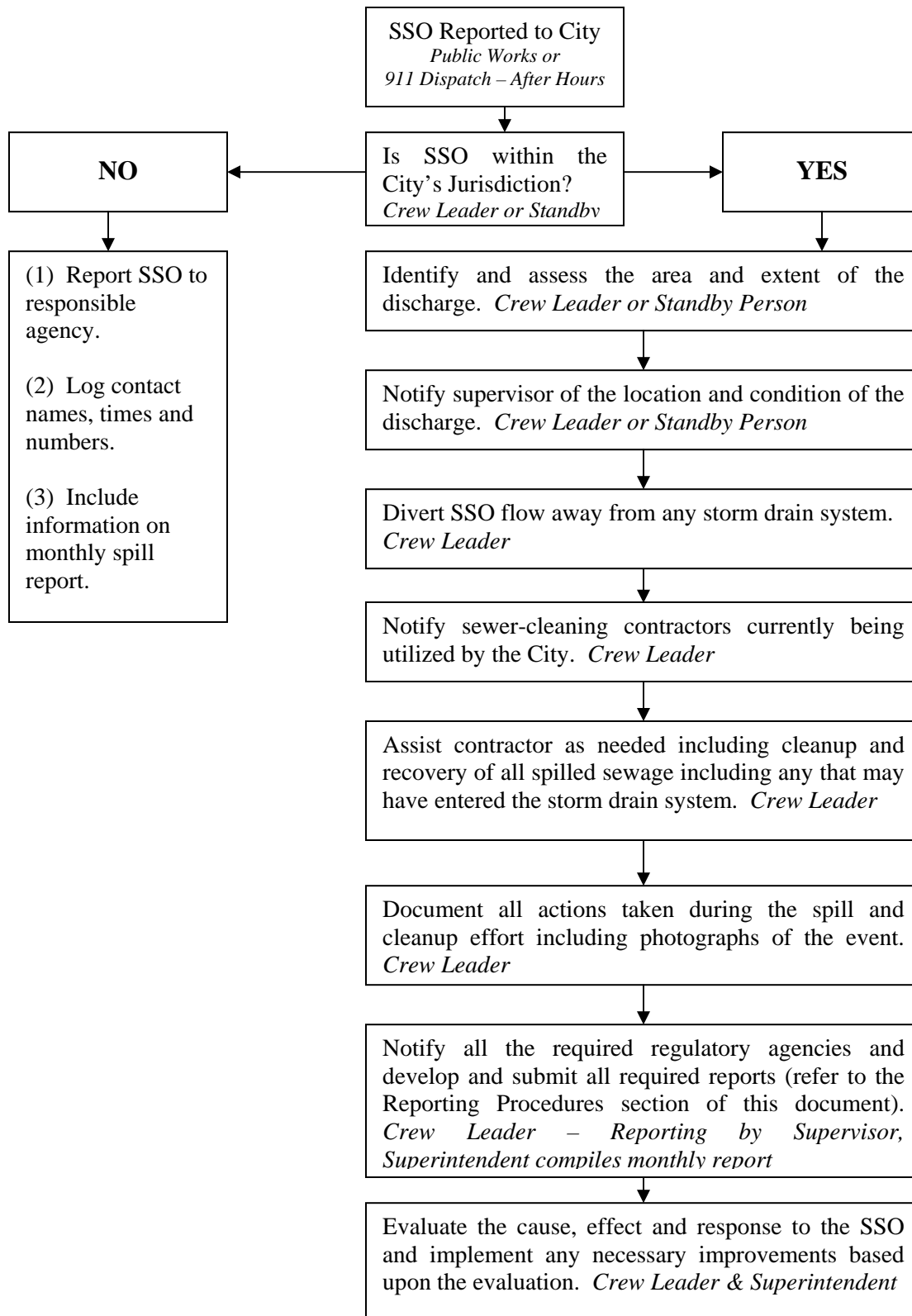
The RWQCB Order requires a specified chain of communications for SSO reporting, from receipt of compliant or other information through reporting to the regulatory agencies.

3.2.1 Compliance Summary.

During normal business hours, SSOs are reported to the City's Public Works Department. The Crew Leader is responsible for responding to the SSO and taking the appropriate action to contain the spill, notify the contractor, assist with cleanup, document the event, notify the appropriate regulatory agencies, and evaluate the cause, effect, and response to the SSO. The Crew Leader will direct Public Works resources as necessary. The Maintenance Services Superintendent, in conjunction with the Crew Leader will, under the signature of the Director of Public Works/City Engineer, complete the necessary reporting documentation. After normal business hours, SSOs are reported to 911 Dispatch who in turn will contact the City's emergency standby person. The emergency standby person will provide the initial spill response and will summon the Crew Leader to remediate the situation.

The following flow chart shows the chain of communication for reporting SSOs. It starts with the receipt of a complaint or other information, and includes the name and title of the person responsible for reporting SSOs to the RWQCB, Orange County Health Care Agency (OCHCA), and State Office of Emergency Services (OES). Reporting to the OES is required only if the discharge is 1,000 gallons or larger. This flowchart is part of the SSO Reporting Guidelines process developed to manage the reporting process, and exists in Placentia's current SSO Emergency Response Plan. The City's Sanitary Sewer Overflow Emergency Response Plan (SSOERP) is located in Appendix E of Volume II of this SSMP.

City of Placentia SSO Procedures Flow Chart



3.2.2 Compliance Documents.

The following organization chart provides the names, titles, and phone numbers for SSO contacts provided in the chain of communication flow chart.

Type of Spill	*Agency(s) to notify	Notification Timeframe	Report Timeframe
≥ 1,000 gallons (whether it does or does not enter the street, curb and gutter, storm drain catch basin, flood control channel, or surface waters of the State)	RWQCB, OES, OCHCA, RDMD	Immediate	5-day report (RWQCB, OCHCA, RDMD) required if you are the responsible party (RP) for the SSO. Also include in your 30-day (RWQCB) monthly report, regardless of RP.
<1,000 gallons and does not enter the street, curb and gutter, storm drain catch basin, flood control channel, or surface waters of the State.	RWQCB, OCHCA	Immediate	30-day (RWQCB) monthly report.
Any size SSO that enters the street, curb and gutter, storm drain catch basin, flood control channel, or surface waters of the State.	RWQCB, OCHCA, RDMD	Immediate	5-day report (RWQCB, OCHCA, RDMD) required if you are the RP for the SSO. Also include in 30-day (RWQCB) monthly report, regardless of RP.
Private property caused SSO that discharged off private property into the street, curb and gutter, storm drain catch basin, flood control channel, or surface waters of the State.	Governing city/county, RWQCB, OCHCA, RDMD	Immediate	Include available information in the 30-day (RWQCB) monthly report.
Private property caused SSO but did not discharge off private property into the street, curb and gutter, storm drain catch basin, flood control channel, or surface waters of the State.	Governing city/county, RWQCB, OCHCA, County of Orange Code Enforcement or RDMD if owner is uncooperative (Control 1 after hours)	Immediate	Not required by the permit, but any available information should be included in your 30-day (RWQCB) monthly report.

The following table compiles the contact information for the various agencies requiring notification of an SSO

Normal Hours	After Hours
⁽¹⁾ OCHCA (714) 433-6000 <i>(Please call down the list, in order, until someone has been contacted)</i> ⁽²⁾ Monica Mazur (714) 433-6280, Pager (714) 628-3000 (5210#) ⁽³⁾ Larry Brennler (714) 433-6284 ⁽⁴⁾ Mike Fennessy (714) 433-6281 ⁽⁵⁾ Larry Honeybourne (714) 433-6015, Pager (714) 628-3000 (7737#)	Control 1: (714) 628-7008
RWQCB - Santa Ana Region (951) 782-4130 Najah Amin (951) 320-6362	OES: (800) 852-7550
California State Office of Emergency Services (OES) (800) 852-7550	24 hours
Orange County Control 1 (714) 628-7008	24 hours
Resources & Development Management Department (714) 567-6363 (storm drain/flood channel facility owners)	Control 1: (714) 628-7008
Caltrans (949) 724-2607	24 hours
Placentia Police Department - Watch Commander (714) 993-8151	24 hours

3.2.3 Roles and Responsibilities.

The roles and responsibilities of each chain (position) in the line of communications are described below:

Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including the management, operation and maintenance of the sanitary collection system including providing response to SSOs and all necessary reporting. Reports to the City Administrator.
Maintenance Services Superintendent	Responsible for the oversight of the Crew Leader or Emergency Standby Person responding to SSOs. Responsible for generating any required reports to the Santa Ana Regional Board. Reports to the Director of Public Works/City Engineer.
Crew Leader	Responsible for responding to the SSO during normal City business hours and taking the appropriate action to contain the spill, notify the contractor, assist with cleanup, document the event, notify the appropriate regulatory agencies, and evaluate the cause, effect, and response to the SSO. Reports to the Maintenance Services Superintendent.

911 Dispatch

Responsible for receiving SSO reports after normal City business hours and notifying the Emergency Standby Person of the SSO.

Emergency Standby Person

Responsible for responding to SSOs after normal City business hours. This person will initiate procedures to protect the MS-4 system from receiving sewage and will notify the Crew Leader to remediate the spill.

CHAPTER 4 – LEGAL AUTHORITY

This chapter describes the legal authority to implement the SSMP plans and procedures.

The SSMP must include the legal authority, through sewer use ordinances, service agreements, or other legally binding procedures, to (a) control infiltration and connections from inflow sources, including satellite systems; (b) require that sewers and connections be properly designed and constructed; (c) ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated service laterals); (d) limit fats and greases and other debris that may cause blockages in the sewage collection system; and (e) implement the general and specific prohibitions of the national pretreatment program under 40 CFR 403.4.

For part (a), the inflow sources may include items such as sump pumps, roof leaders, yard and stairwell drains, satellite systems, or any other materials that adversely affect the performance of the collection system and/or the WWTP.

For part (c), The legally binding documents will also ensure that the testing is conducted, and baseline condition assessment is completed for sewer system construction projects (air test, CCTV, pump station performance, etc.) and that procedures are in place to transfer the resulting test data to the end user. These should also require development and implementation of technical requirements and training standards for construction inspectors.

For part (d), the grease, oils, and fats control program will be for commercial, industrial, and institutional users and will combine source and field control to reduce SSOs caused by the discharge of FOG to the collection system.

4.1 Compliance Summary

This SSMP complies with the Order requirements for legal authority under the following enacted ordinances/resolutions or agency policies.

(a) The City has an I&I control program as part of its ongoing line cleaning and maintenance program that includes CCTV and other mechanisms to detect and eliminate I&I. The Placentia Municipal Code (PMC) Section 16.12.140 covers I&I contributions from private laterals. It states, “It shall be the responsibility of each property owner to maintain the sewer lateral serving his property in proper working order.” Under PMC 20.12.010, the City adopted the 2001 California Plumbing Code (CPC) and appendices. The CPC (714.2) also prohibits the unauthorized discharge of rain, surface or subsurface water into the collection system. PMC Section 20.12.030 allows for criminal penalties for any violations of the CPC.

(b) (c) By adopting the CPC, which includes requirements for the proper construction, connections, materials, etc., the City requires that all sewers and connections be properly designed and constructed as per the CPC. Likewise, the CPC outlines and requires the proper installation, testing and inspection of new and rehabilitated sewers. Additionally, the City utilizes the Standard Publication for Public Works Construction, 2003 Edition – Greenbook for pipeline inspections. Pipeline and other appurtenance construction guidelines are provided by the Standard Plans for

Public Works Construction, 1997 Edition the City's Sewer Notes. These publications are maintained at the City's Engineering Division of the Public Works Department. The City enforces the codes through its building inspectors and building permit process.

(d) Legal authority for control of fats, oil and grease was enhanced on November 16, 2004 when Ordinance Number 0-2004-07, added chapter 16.24 to the Placentia Municipal Code establishing fats, oils and grease control regulations applicable to food service establishments was adopted by the City Council.

(e) OCSD provides the pretreatment program for the City. Additionally, the City has addressed this issue in Chapter 16.04 of the PMC as well as in the CPC 714.1.

The construction and inspection of new lateral connections and bypass piping facilities is legally enforced through the City's connection permit program and the City's Building Inspector. Standards for construction and inspection are included in the CPC and the Publication for Public Works Construction, 2003 Edition – Greenbook and are maintained at the Engineering Division of the Public Works Department

Inspection and testing of new system connections is governed by the CPC and Publication for Public Works Construction, 2003 Edition – Greenbook that is maintained at the Engineering Division of the Public Works Department.

4.2 Compliance Documents

The legal authority for enacting the SSMP programs and policies are included in the following documents:

- Placentia’s FOG Control Ordinance, 11/16/2004, included as Appendix L of Volume II of this SSMP.
- Connection permits are required by Chapter 16.12 of the Placentia Municipal Code. – This Chapter is located in Appendix F of this SSMP. The entire Placentia Municipal Code is available through the City’s website or at City Hall. The City of Placentia has adopted the 2001 California Plumbing Code (amended) as the plumbing code of the City (Ch. 20.12 of the Placentia Municipal Code).
- I&I control can be found in the California Plumbing Code and in the Placentia Municipal Code 16.12.140. - This Chapter is located in Appendix F of this SSMP. The entire Placentia Municipal Code is available through the City’s website or at City Hall. The City’s I&I Control Program is part of the City’s Sanitary Sewer Preventive Maintenance Program (SSPMP), located in Appendix G of Volume II of this SSMP.
- Publication for Public Works Construction, 2003 Edition – Greenbook is available at the Engineering Division of the Public Works Department.
- Standard Plans for Public Works Construction, 1997 Edition are available at the Engineering Division of the Public Works Department.
- City’s Sewer Notes are available at the Engineering Division of the Public Works Department.

4.3 Roles and Responsibilities

The roles and responsibilities for enforcement of the legal authority to enact the SSMP programs and policies are derived from acts of the City’s governing Council. Interpretation of the enabling state legislation giving authority to the City is provided by the City Attorney.

Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including code compliance with Public Works construction projects. Reports to the City Administrator.
Building Inspector	Responsible to ensure compliance with City building codes for private property construction projects.
Public Works Inspector	Responsible to ensure compliance with specifications and codes for Public Works construction projects.
Code Compliance Officer	Responsible for enforcing City codes including the City’s FOG Ordinance, NPDES, and FOG discharge violations.
FOG Program Manager	Responsible for the management and oversight of the City’s FOG source control program.

CHAPTER 5 – MEASURES AND ACTIVITIES

This chapter describes the various operational and maintenance activities involved to properly operate and maintain the City's collection system.

5.1 Operations and Maintenance

A summary of the measures and activities requirements are as follows:

- Provide adequate operation and maintenance of facilities and equipment.
- Maintain relevant information to establish and prioritize appropriate SSMP activities (such as the immediate elimination of dry-weather overflows or overflows into sensitive waters, such as public drinking water supplies and their source waters, swimming beaches and water where swimming occurs, shellfish beds, designated Outstanding National Resource Waters or Areas of Special Biological Significance, National Marine Sanctuaries, waters within Federal, State, or local parks, and water containing threatened or endangered species or their habitat), and identify and illustrate trends in overflows, such as frequency and volume
- Conduct a routine preventative operation and maintenance activities by staff and contractors; including a system for scheduling regular maintenance and cleaning of the collection system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system of tracking work orders and assessing the success of the PM program
- Identify and prioritize structural deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. This shall include a rehabilitation plan including schedules for the entire system. As with the PM program, sewer rehabilitation and replacement is crucial for the prevention of spills. Among the provisions that should be specified in this section is the need to direct rehabilitation and replacement at sewer pipes which are at risk of collapse or prone to more frequent blockages due to pipe defects. The program should also include regular visual and TV inspection of sewer pipes and a system for assessing and ranking the condition of sewer pipes. Finally, the rehabilitation and replacement (R&R) plan should include a financial plan that properly funds the R&R of infrastructure assets.

5.1.1 Compliance Summary.

The operation and maintenance of the City's sanitary collection system is the responsibility of the City's Department of Public Works. Due to the small size of the City's Public Works staff, maintenance of the collection system is performed via outside contract with Public Works personnel providing oversight. To comply with the requirements of the WDR and to assist the City's Public Works staff in ensuring that the collection system is properly operated and maintained, the City has developed a comprehensive written Preventive Maintenance Program. The Preventive Maintenance Program describes how the City's collection system is to be operated and maintained paying

particular attention to preventive and predictive maintenance, inspection, hot spots and record keeping. The program includes a line cleaning guide that includes specifications for line cleaning that contractors must meet. The sewer line inspection guide outlines the requirements that the CCTV contractor must adhere to. The I&I Reduction Plan outlines methodology of the City's I&I Reduction Program.

The City of Placentia is currently revamping its sanitary collection system preventative and corrective maintenance program. Starting with fiscal year 05/06, the City will embark on a comprehensive annual cleaning program of all of its collection system lines coupled with 25% of the system being CCTV inspected during each of the first 3 years of the project. This inspection data added to existing CCTV inspection data will provide the City with recent, accurate inspection information for over 90% of the City's collection system by the end of fiscal year 07/08. During, and upon completion of the first three years, the system condition and maintenance needs shall be thoroughly evaluated. Based upon this evaluation, routine maintenance shall be tailored to meet the actual needs of the system including updating the CIP program for system rehabilitation and replacement.

During the first year of comprehensive cleaning, a designated City representative will accompany the line cleaning contractor to perform manhole inspections, pipe size and material verification, plot manhole locations and their depth, and verify the accuracy to the City's sanitary collection system atlas maps. This information will be entered into an electronic database suitable for eventual transfer into a future City GIS system. Any deviations will be noted and the atlas maps updated.

To assist the City in ensuring that the operation and maintenance of its sanitary collection system is efficient and adequately addresses the actual needs of the system, as well as remaining compliant with the WDR, the City is embarking upon a shared resource pilot project with OCSD. Under this pilot project, OCSD will make available resources to the City, on an as needed basis, to assist the City with its selection of contractors, maintenance, rehabilitation and repair specifications, pipeline inspections and evaluations, program development, operator training, development of short and long term CIP projects, budget requirements, and other assistance as needed by the City.

Funding for the operation and maintenance of the City's sanitary collection system is provided by the City's sewer service fee. The sewer service fee was adopted by the City Council in April 2005 and is dedicated to providing necessary funds for the collection system. The sewer service fee is structured to provide one-third of its revenue for daily operations, maintenance and administration, one-third for CIP, and one-third for funding of short and long-term reserves for future system replacement.

5.1.2 Compliance Documents.

The documents supporting compliance with the requirements for Measures and Activities are as follows:

- Sanitary Sewer Preventive Maintenance Program – Included as Appendix G in Volume II of this SSMP.
- Sewer Line Cleaning Guide – Included as part of the Sanitary Sewer Preventive Maintenance Program located in Appendix G of Volume II of this SSMP.

- Sewer Line Inspection Guide - Included as part of the Sanitary Sewer Preventive Maintenance Program located in Appendix G of Volume II of this SSMP.
- I&I Reduction Plan - Included as part of the Sanitary Sewer Preventive Maintenance Program located in Appendix G of Volume II of this SSMP.
- Sanitary Sewer Overflow Emergency Response Plan – Included in Appendix E of Volume II of this SSMP.
- Replacement and Rehabilitation Plan – Included in Appendix K of Volume II of this SSMP.

Collection system drawings are on file and are located at Engineering Division of the Public Works Department at the Placentia City Hall. Copies of the system drawings are additionally available for staff use at the City's Corporation Yard with sewer and storm drain atlas maps located within the first response vehicles.

5.1.3 Roles and Responsibilities.

The roles and responsibilities of staff supporting compliance with the Measures and Activities are as follows:

City Administrator	Responsible for the day-to-day management and operation of the City under the direction of the City Council.
Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including the management, operation and maintenance of the sanitary collection system. Reports to the City Administrator.
Maintenance Services Superintendent	Responsible for the operation and maintenance activities of the Public Works Department including the sanitary collection system. Reports to the Director of Public Works/City Engineer.
Maintenance Supervisor	Responsible for the oversight of the Public Works Department field service personnel including those crews responsible for the operation and maintenance of the sanitary collection system. Reports to the Maintenance Services Superintendent.
Crew Leader	Responsible for the oversight of the operation and maintenance activities of the sanitary collection system. This includes monitoring of contractors to ensure their operations meet the City's specifications. The Crew Leader also assigns and has oversight for the activities of the field crews. Reports to the Maintenance Supervisor.
Field Crews	Responsible for field operation and maintenance activities of the sanitary collection system. These

	include: response to SSOs, traffic control, assistance with clean-up and other activities as needed. Reports to the Crew Leader.
Code Compliance Officer	Responds to violations of the City's Municipal Code. Is responsible to enforce the City's Municipal Code relative to private property spills that enter the public right of way or incidents where a private property owner causes or contributes to an SSO within the City's collection system including violations of the City's FOG ordinance. Reports to the City's FOG Control Program Manager and the Director of Public Works/City Engineer.
FOG Control Program Manager	Responsible for the implementation, administration and management of the City's FOG Control Program. Reports to the Director of Public Works/City Engineer.
Management Analyst	Responsible for assisting in the development and implementation of the City's WDR programs. Also responsible for the review and revision of these programs.

5.2 Engineering Data Management

The requirement for this section is to maintain an up-to-date map of the collection system showing all gravity line segments and manholes, and stormwater conveyance facilities

5.2.2 Compliance Summary.

The City maintains a system of paper atlas maps of its sanitary collection system. This is in addition to the Tract As-Built maps showing both the collection system and storm drain systems. These maps are housed in the Engineering Division of the Public Works Department for the City. The maps include the locations of manholes and their ID tags, siphons, easements, property parcels, pipelines, their depth and direction of flow. These maps are currently being reviewed and updated by the City's engineering consultant and Engineering Division of the Public Works Department with the goal of eventual incorporation into a citywide GIS system. Map books, which contain paper copies of both the sanitary collection system and the storm drain system, are available to maintenance personnel and are in those vehicles utilized for first response in the event of an SSO. As part of phase I of the preventive maintenance program, a City representative will accompany the line cleaning contractor to inspect and plot the position of all manholes, determine pipe size, material and direction of flow, and will verify current information on the atlas maps making updates as necessary.

The City completed its latest storm drain master plan 2000 in January 2001. This master plan includes mapping of the City's storm drain system as well as an analysis of the stormwater conveyance system. The City also maintains atlas maps of the storm drain system. Like the sewer atlas maps, the storm drain atlas maps are housed in the Engineering Division of the Public Works Department. Copies of both the sewer atlas and storm drain atlas maps are kept in the Public

Works first responders vehicles being available to the City's Public Works field crews. These maps are reviewed and updated periodically.

5.2.3 Compliance Documents.

Documents which support compliance of this section include the following:

- Tract Maps – Available at the Engineering Division of the Public Works Department.
- Sewer Atlas Maps - Located within first responder's vehicles, at the Public Works Corporation Yard, and at the Engineering Division of the Public Works Department.
- Storm Drain Atlas Maps - Located within first responder's vehicles, at the Public Works Corporation Yard, and at the Engineering Division of the Public Works Department.
- 2000 Storm Drain Master Plan – Located at the Engineering Division of the Public Works Department.
- 2005 Sewer Master Plan – Located at the Engineering Division of the Public Works Department.

5.2.4 Roles and Responsibilities.

Original collection system maps are owned and maintained by the Engineering Division of the Public Works Department.

5.3 Capacity Assurance

The City of Placentia is required to establish a program to assess the current capacity of the collection system owned by the City or where the City has operational control; including diversions of urban runoff to the sewer system during dry weather periods and control of infiltration and intrusion during both wet weather events and dry weather periods.

5.3.1 Compliance Summary.

To ensure that the City's sanitary collection system maintains adequate capacity for the type of land use it serves, the City has historically, since 1975, included hydraulic computer modeling of its trunk sewer system as part of its Sewer Master Plan revisions. In the year 2000, the City contracted to have its current Sewer Master Plan of 1992 updated. Unfortunately, due to financial constraints, the new 2000 Sewer Master Plan was only partially completed. As part of the preparation for the 2000 Sewer Master Plan, the City commissioned a flow study to be performed within the City to determine the actual wastewater generation factors from the various types of sanitary collection system users within the City. This data was to be utilized to provide an accurate and up-to-date calibration of the hydraulic computer model and produce an updated Sewer Capacity Study. Prior to this, the model had been calibrated with standard engineering return flow data or data from OCS to establish the wastewater generation factors for land use types. Current and future land use is consistent with the City's General Plan. Unfortunately, due to financial constraints, the Sewer Capacity Study of 2000 was never completed. In the spring of 2005, as part of the City's requirements of the WDRs for the development of a Sanitary Collection System Capacity Assurance Plan, the 2000 Sewer Capacity Study and associated hydraulic computer model was rerun with

updated data and is part of the City's Sanitary Collection System Capacity Assurance Plan. The hydraulic computer model and Sewer Capacity Study divide the City's sanitary collection system into 44 trunk lines or reaches. The computer model analyzes each reach, and each pipe segment within each reach, and predicts flow velocity and volume. Based upon the pipe diameter of each segment and utilizing the predicted flow velocity, volume and other factors, the d/D ratio (d = depth of flow; D = diameter of the pipe) for peak dry weather flows is determined. The d/D ratio is one of the factors that are utilized to determine if a pipe segment has sufficient capacity. For the City's existing pipelines, a d/D ratio of .76 for peak dry weather flows has been determined as sufficient. With the record setting rainfalls of the 2004-2005 wet season, the City did not have any SSOs that were attributed to a lack of capacity. For new pipeline construction or replacement pipelines, a d/D ratio of .50 is utilized for pipelines 12 inches or less in diameter and .75 for 15 inch and larger pipes. This, over time, will additionally improve the City's sanitary collection system capacity.

The Sewer Capacity Study and associated hydraulic computer model is an indicator of where capacity concerns may arise. The City utilizes two methods to determine if actual capacity issues exist. Upon reviewing the results of the Sewer Capacity Study, a prioritized list of potential capacity problem areas is generated. The location of a suspected capacity problem relative to a known hot spot, pipe size and flow volumes, as well as other factors, are considered in prioritizing the list of potential capacity problem areas. Based upon the prioritized list, City crews will first perform visual monitoring. This includes measuring the flow depth at given intervals during the day over a period of several days. If deemed necessary, CCTV inspections are employed as well as determining pipe depth and slope to ensure the hydraulic computer model utilized accurate data. This procedure was followed for the current capacity study. Data gathered during Phase I of the maintenance program will also be used to evaluate and ensure the City's collection system has sufficient capacity. Any areas found to have insufficient capacity are added to the sanitary collection system CIP list.

During Phase I of the maintenance program, potential sources of I&I will be investigated and, if found, a remediation plan will be developed to ensure the system maintains adequate capacity for the land use it serves. Sources of I&I within the City's collection system that require an engineering solution will be added to the CIP list. Sources of I&I from private property will be handled by the City's Code Compliance or Code Enforcement Officer for that property owner's remediation of the I&I source.

The sewer service fee provides funding for the remediation of areas of insufficient capacity. This fee is a needs based fee and is adjusted to meet the demands of the system including the funding of dedicated short and long term reserves to provide funds for the replacement or rehabilitation of the collection system.

5.3.2 Compliance Documents.

The documents supporting compliance with the capacity assurance requirements are as follows:

- Capacity Assurance Plan – Included as Appendix H in Volume II of this SSMP.
- Replacement and Rehabilitation Plan – Included in Appendix K of Volume II of this SSMP.
- 2005 Sewer Master Plan - Located in the Office of the Director of Public Works/City Engineer.

- 2005 Sewer Capacity Study - Located in the Office of the Director of Public Works/City Engineer.
- City General Plan – Available at the Placentia City Hall

5.3.3 Roles and Responsibilities.

The staffed positions and their roles and responsibilities in supporting compliance with the Capacity Assurance requirements are as follows:

City Administrator	Responsible for the day-to-day management and operation of the City under the direction of the City Council.
Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including the management, operation and maintenance of the sanitary collection system. Reports to the City Administrator.
Director of Development Services	Responsible for City planning and development. Reports to the City Administrator.

5.4 Training Program

The City of Placentia is required to provide training on a regular basis for staff in collection system operations, maintenance, and monitoring, and determine if contractors' staffs are appropriately trained.

5.4.1 Compliance Summary.

The City has an ongoing training program for its Public Works employees. As part of this program, the Public Works field employees attended a WDR Awareness Training workshop held at the City Yard. An abbreviated WDR Awareness Training program was presented to all other City personnel. City Public Works field employees have also undergone, and continue to receive, SSO Response Training held in conjunction with the City's stormwater program at OCSD's SSO Response training facility. Public Works employees have also attended seminars for regional sewer spill response. City Public Works employees have also participated in the NASSCO Pipeline Assessment and Certification Program. As part of the shared resource pilot project with OCSD, City employees will share in various collection system oriented training programs offered by the District. This training will include collection system maintenance and line cleaning procedures as well as inspection techniques. Additionally, the City is seeking to have certain maintenance division personnel acquire CWEA certification.

Contractors providing service to the City on its collection system must demonstrate to the City that their employees are adequately trained in collection system maintenance techniques, confined space safety, and can properly operate the equipment they utilize.

5.4.2 Compliance Documents.

City employee training records are maintained in their personnel files – Available at the Placentia City Hall.

5.4.3 Roles and Responsibilities.

The staffed positions and their roles and responsibilities in supporting compliance with the training requirements are as follows:

Maintenance Services Superintendent	Responsible for the training of Public Works field crews and to ensure that contractors providing service to the City are adequately trained in the use of their equipment, safety, and maintenance techniques. Reports to the Director of Public Works/City Engineer.
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5.5 Communication Program

The communication program requirements are summarized in the following elements:

- Establish and implementation plan and schedule for a public education outreach program that promotes proper disposal of grease and fats

The City of Placentia has a FOG control program and ordinance “building blocks” from which co-permittees can select and adapt for implementing a FOG source control program. One of the FOG control building blocks is public education and outreach. In conjunction with this effort, the City has distributed a brochure, and will create other informational items for the public. Placentia was a participant in the development of the FOG Tool Kit and uses the elements of the tool kit to educate and inform businesses and residents of the proper disposal of FOG. The City has held a public meeting inviting FSEs to inform and educate all concerned on the City’s FOG Control Program. The City has also developed handout material for food service establishments (FSEs) under the FOG Control Program to assist the FSEs in compliance. The City is currently updating its website to have dedicated pages for sewer and stormwater to disseminate information and education on sewer and stormwater issues. The City also utilizes its quarterly newsletter, special events and restaurant inspections as an opportunity to disseminate FOG related information.

- In accordance with the County of Orange’s Drainage Area Management Plan (part of the NPDES MS4 permit), we have established a plan for responding to SSOs from private property that discharge to public right of ways and storm drains, to prevent discharges from SSOs to surface waters and storm drains.

The City of Placentia’s practice is to respond, investigate, and attempt to contain all SSOs that reach public rights of way and storm drains.

- We have developed a plan and a schedule for providing an analysis of alternative methods of disposal for grease and fats, and an implementation plan and a schedule for providing adequate disposal capacity for grease and fats generated within the sewer system service area. This plan includes an evaluation of the feasibility of using sludge digesters at the OCSD treatment plant for grease disposal and treatment, recycling, rendering, and other disposal alternatives.

A report titled “*In-Plant FOG Impact Study*” was submitted to the RWQCB on 12/28/2004, on behalf of OCSD and the City of Placentia. A copy of this report is available at the Office of the Director of Public Works/City Engineer.

CHAPTER 6 – DESIGN AND PERFORMANCE PROVISIONS

This chapter references the design and construction standards & specifications for new sewer systems, and other appurtenances, and for the rehabilitation and repair of existing sewer systems. Also included are the procedures and standards for the inspection and testing of these facilities.

6.1 Compliance Summary

The City utilizes the services of an outside consulting design engineer for new construction, replacement or rehabilitation of its collection system. The City has also adopted the CPC and requires that all construction meet the required standards and specifications. Construction management may also be outsourced to a qualified source. To assist City personnel, the City utilizes the CPC, Standard Publication for Public Works Construction, 2003 Edition – Greenbook for pipeline inspections, Standard Plans for Public Works Construction, 1997 Edition, and the City’s Sewer Notes for pipeline and other appurtenance construction.

All past and current work has been guided by these various standards and specifications that are on file now and subject to change as needed.

6.2 Compliance Documents

The documents used for design and performance evaluations include the following:

- California Plumbing Code – located at the Engineering Division of the Public Works Department
- Standard Publication for Public Works Construction, 2003 Edition – Greenbook - located at the Engineering Division of the Public Works Department
- Standard Plans for Public Works Construction, 1997 Edition – located at the Engineering Division of the Public Works Department
- City’s Sewer Notes – located at the Engineering Division of the Public Works Department

6.3 Roles and Responsibilities

The positions, roles, and responsibilities of the Design and Performance staff are as follows:

Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including code compliance with Public Works construction projects. Reports to the City Administrator.
Building Inspector	Responsible to ensure compliance with City building codes for private property construction projects.
Public Works Inspector	Responsible to ensure compliance with specifications and codes for Public Works construction projects.

CHAPTER 7 – MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

Under the Order, there are three key monitoring, measurement, and program modification requirements. They are to:

- Monitor implementation and, where appropriate, measure the effectiveness of each SSMP element,
- Update program elements, as appropriate, based on monitoring or performance evaluations, and
- Modify the SSMP program, as appropriate, to keep it updated and accurate, and available for audit at all times.

7.1 Compliance Summary

The City of Placentia developed appropriate methods and measures to accomplish this, and they are included in this section. Information and data is always available for audit as provided under the Order. Changes will be made as necessary to continually improve this document. The City will be participating in the WDR audit subcommittee and is expecting to comply with the recommendations of that subcommittee.

The City of Placentia has been reporting and keeping statistics on all of its SSOs. Currently, records of individual SSOs are kept in hard copy and a monthly summary on an Excel spreadsheet. The City is investigating utilizing appropriate software to keep its SSO incident reports electronically. A summary of SSO is maintained in an Excel database and submitted monthly to the Regional Board. These records are reviewed for source and cause during the investigation process of an SSO and will be utilized as a measure of effectiveness of the overall SSMP.

7.2 Compliance Documents

The compliance documents are as follows:

- Individual spill reports – located at the City’s Public Works Corporation Yard.
- Monthly summary SSO reports – located at the City’s Public Works Corporation Yard.
- Line cleaning and maintenance reports – located at the City’s Public Works Corporation Yard.
- Hot spot cleaning reports – located at the City’s Public Works Corporation Yard.

7.3 Roles and Responsibilities

The positions, roles, and responsibilities are as follows:

Maintenance Services Superintendent

Responsible for the overall performance of the SSMP and its effectiveness. The Maintenance Services Superintendent may enlist the services of the City's Management Analyst to assist in evaluating the program's effectiveness. Reports to the Director of Public Works/City Engineer.

CHAPTER 8 – OVERFLOW EMERGENCY RESPONSE PLAN

Under the Order, each discharger shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan shall include the following:

- Proper notification procedures to notify primary responders of all SSOs in a timely manner.
- Procedures for immediate dispatch of overflow reports for investigation and appropriate immediate response.
- Identification of health agencies and impacted entities (including RWQCB, OCHCA, and State OES) to be notified after an SSO, and procedures for immediate notification.
- Training program for staff and contractor personnel.
- Provisions for emergency operations such as traffic/crowd control and other necessary emergency response.
- What steps (including accelerated or additional monitoring) are being taken to contain sewage and prevent sewage discharge to surface waters, and to minimize or correct any adverse impact from SSOs.
- Development and implementation of plan for use of portable aerators.
- Development and implementation of plan for timely response to spills and other emergencies. Collection system staff should be identified in this plan and should be able to respond to a spill in less than an hour from the first call. Plan should also reflect that system either owns or has ready access to spill and emergency response equipment.

8.1 Compliance Summary

The City of Placentia has developed an SSO Emergency Response Plan (ERP). A copy was submitted to the Regional Board on or before January 1, 2003, and was updated in September of 2005. A copy of the SSOERP is located in Appendix E of Volume II of this SSMP.

The City's SSOERP consists of detailed instructions for City personnel for responding to an SSO or any other type of unauthorized spill within the City's jurisdiction. The SSOERP includes notification procedures, personnel callout lists, contractors and others resources that may be needed to respond to a spill. The SSOERP also includes descriptions of the duties that the City's first responders are responsible to perform.

Although the City does not have any impounded water bodies within its jurisdiction that might require a Portable Aeration Plan, there is a potential for an SSO to migrate through the City's MS-4

system to either the Santa Ana River or Carbon Creek, the City has, via its participation on the WDR Steering Committee, assisted OCSD in the development of the Portable Aeration Report.

8.2 Compliance Documents

The compliance documents are as follows:

- SSO Emergency Response Plan - Is included as Appendix E in Volume II of this SSMP
- Portable Aeration Plan – located in the Office of the Director of Public Works/City Engineer

8.3 Roles and Responsibilities

The positions, roles, and responsibilities are as follows:

Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including the management, operation and maintenance of the sanitary collection system. Reports to the City Administrator.
Maintenance Services Superintendent	Responsible for the operation and maintenance activities of the Public Works Department including the sanitary collection system. Reports to the Director of Public Works/City Engineer.
Maintenance Supervisor	Responsible for the oversight of the Public Works Department field service personnel including those crews responsible for the response to SSOs. Reports to the Maintenance Services Superintendent.
Crew Leader	Responsible for the oversight of the operation and maintenance activities of the sanitary collection system. This includes monitoring of contractors to ensure their operations meet the City’s specifications and response to SSOs. The Crew Leader also assigns and has oversight for the activities of the field crews. Reports to the Maintenance Supervisor.
Field Crews	Responsible for field operation and maintenance activities of the sanitary collection system. These include: response to SSOs, traffic control, assistance with clean-up and other activities as needed. Reports to the Crew Leader.
Code Compliance Officer	Responds to violations of the City’s Municipal Code. Is responsible to enforce the City’s Municipal Code relative to private property spills that enter the public right of way or incidents where a private property owner causes or contributes to an SSO within the City’s collection system including violations of the City’s

Emergency Standby Person

FOG ordinance. Reports to the City's FOG Control Program Manager and the Director of Public Works/City Engineer.

Responsible for responding to SSOs after normal City business hours. Performs the same duties as the Crew Leader in the Crew Leader's absence.

CHAPTER 9 – FATS, OILS, AND GREASE CONTROL PROGRAM

Under the Order, the City of Placentia is responsible for preparing and implementing a fats, oils, and grease source control program to reduce the amount of these substances discharged to the sewer collection system. The key requirements of the plan are to:

- Include the legal authority to prohibit discharges to the system
- Identify measures to prevent SSOs caused by fats, oils, and grease blockages of sewers. Include listing of specific requirements, such as requirements to install grease removal devices (traps or interceptors), design requirements, record keeping and reporting requirements.
- Include authority to inspect grease-producing facilities
- Identify enforcement authorities
- Provide sufficient staff to inspect and enforce grease ordinance, and identify who that staff is
- Identify sections of the sewer system subject to grease blockages, and establish cleaning maintenance schedule for each section
- Develop and implement source control measures for each identified section that is subject to grease blockages

9.1 Compliance Summary

The City of Placentia recognizes that historically over 90% of the SSOs having a known cause within the City's collection system were due to an accumulation of fats, oils and grease (FOG). Likewise, the majority of the City's hotspots are FOG related. As a preventative measure, these hotspots are on an enhanced cleaning schedule being cleaned at least quarterly. With the adoption of the WDR, the City developed and implemented a comprehensive FOG source control program. This is a permit-based program affecting all food service establishments (FSEs) that discharge into the City's sanitary collection system. This program and its supporting FOG Control Ordinance are derivatives of the model FOG Control Ordinance and program developed by OCSD in conjunction with the WDR Committee. The Ordinance and program require that all new or remodeled FSEs install an approved grease interceptor. Existing FSEs have up to five years to install an approved grease interceptor. The Ordinance and program, on a case-by-case basis, allows for variances and waivers under limited specified conditions with the approval of the City's FOG Control Program Manager. Enforcement is provided through a series of inspections with the ability to issue citations or take other necessary steps to ensure compliance with the program. These inspections were initiated with the programs adoption and are ongoing.

A FOG Characterization Study was performed to identify areas of FOG concentration. In this study, FSEs were inventoried and their relationship to known hotspots was plotted. The City

intends to use the FOG Characterization Study as a measure of the FOG program's effectiveness and will update the study as additional information becomes available.

9.2 Compliance Documents

The FOG control program activities are documented under the following ordinances, reports, and studies:

- FOG Control Ordinance - Included as Appendix L in Volume II of this SSMP.
- FOG Control Program - Included as Appendix M in Volume II of this SSMP.
- FOG Characterization Study - Included as Appendix N in Volume II of this SSMP.
- FOG Disposal Alternatives Report – In-Plant FOG Impact Study (OCSD) – Located at the office of the Director of Public Works/City Engineer.

9.3 Roles and Responsibilities

The positions, roles, and responsibilities of the staff in the FOG control program are as follows:

Maintenance Services Superintendent	Responsible for the operation and maintenance activities of the Public Works Department including the sanitary collection system. Reports to the Director of Public Works/City Engineer.
FOG Control Program Manager	Responsible for the implementation, administration and management of the City's FOG Control Program. Reports to the Director of Public Works/City Engineer.
Code Compliance Officer	Responds to violations of the City's Municipal Code. Is responsible to enforce the City's Municipal Code relative to private property spills that enter the public right of way or incidents where a private property owner causes or contributes to an SSO within the City's collection system including violations of the City's FOG ordinance and is also responsible for enforcing the City's NPDES permit. Reports to the City's FOG Control Program Manager and the Director of Public Works/City Engineer.

CHAPTER 10 – SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

As prescribed by the RWQCB Order, the City of Placentia has prepared and implemented a capital improvement plan. This plan includes the following:

- **Evaluation.** The portions of the collection system which could experience or contribute to an SSO discharge caused by hydraulic deficiency have been identified. Included in the evaluation are estimates of peak flows (including from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity), and the major sources that contribute to the peak flows associated with overflow events
- **Capacity Enhancement Measures.** Placentia has established a short- and long-term capital improvement program (CIP) to address identified hydraulic deficiencies. The CIP includes project cost estimates, project prioritization, alternatives analysis, and construction schedules.
- **Plan Updates.** This plan will be updated annually. The updates will describe any significant changes in proposed actions and/or implementation schedules, and will include information on the performance of measures that have been implemented.

10.1 Compliance Summary

To ensure hydraulic deficiencies are addressed within the City's collection system, the City has developed a Capacity Assurance Plan and a Replacement/Rehabilitation Plan. To provide adequate capacity, the City periodically initiates flow studies to calibrate the computer model used to analyze system capacity within the City's various reaches and pipe segments. The computer model will give an indication of a possible capacity issue based upon land use, pipe size, pipe slope, flow velocities, and other factors. To verify the capacity issue, the City will conduct flow monitoring, visual and CCTV inspections as necessary. Pipe segments with proven capacity issues are prioritized and placed upon the CIP list for the appropriate engineering solution.

As the system ages, replacement or rehabilitation is required. To address this issue the City has developed Replacement/Rehabilitation Plan for its collection system. Initially this plan calls for replacement of rehabilitation of the collection piping and manholes based upon the materials used and the date the system was placed in service. To accomplish this, the system was divided into 6 geographical drainage area consistent with tract development within those drainage areas and their relationship to the OCSD interceptor system. Initial replacement/rehabilitation target dates were established based upon the engineered life expectancy of the materials used in the manufacturing of the pipelines. During and upon completion of Phase I of the City's maintenance program requiring CCTV inspections of 25% of the system each year for three years with regular CCTV inspections thereafter, the Replacement/Rehabilitation Plan will be periodically updated. As pipeline defects currently unknown become known through this process, these defective pipe segments will be added to the CIP list for the appropriate engineering solution.

Funding is provided for the replacement/rehabilitation of the City's collection system by the sewer service fee. Approximately one-third of the sewer service fee is utilized to fund short and long-term reserves dedicated to the replacement/rehabilitation of the City's collection system.

The City of Placentia has design standards and guidelines to ensure adequate capacity and proper replacement or rehabilitation of the collection system. Placentia's CIP assures that older facilities are upgraded as needed to ensure adequate capacity through out the system. The City's sewer service fee is dedicated to providing the necessary funds to ensure adequate capacity, replacement or rehabilitation of the City's collection system asset.

The City of Placentia is not currently experiencing capacity-related problems.

10.2 Compliance Documents

The documents used for system evaluation and capacity assurance are as follows:

- Capacity Assurance Plan - Included as Appendix H in Volume II of this SSMP.
- Replacement and Rehabilitation Plan – Included in Appendix K of Volume II of this SSMP.
- Sewer System Master Plan 2005 - Located at the office of the Director of Public Works/City Engineer.
- City General Plan – Located at the Placentia City Hall

10.3 Roles and Responsibilities

The CIP development, implementation, and update is the responsibility of Placentia's Public Works, Development Services, and Finance Departments.

The Public Works Department is responsible for the operation and maintenance of the City's collection system including capacity, rehabilitation or replacement.

The Development Services Department is responsible for the City's General Plan that includes current and future land use.

The Finance Department is responsible for developing funding opportunities and overseeing the expenditure of funds for the CIP program.

CHAPTER 11 – PROGRAM AUDITS

As a part of the SSMP, the City of Placentia has conducted an internal audit, appropriate to the size of the system and the number of overflows, and submitted a report of such audit, evaluating the SSMP and its compliance, including its deficiencies and steps to correct them.

11.1 Compliance Summary

The City of Placentia will be participating with the WDR audit subcommittee to cover the WDR program and its elements. Internal audits were conducted prior to the final submittal of the final SSMP to ensure that it meets all requirements. The City's Director of Public Works/City Engineer, Management Analyst and consultant conducted internal audits on an ongoing basis during the development of the SSMP. Some of the SSMP's elements were rewritten due to staffing or policy changes within the City or to facilitate a more efficient program.

The City's Management Analyst and Maintenance Services Superintendent will conduct citywide internal audits as this process unfolds. Strategies to correct deficiencies, if they exist, will be developed in conjunction with the City's involvement with the WDR's audit subcommittee.

11.2 Compliance Documents

The City has not previously been required to perform the type of audit required by this order. To assist in developing the necessary methodology to ensure the City's SSMP programs are meeting their efficiency goals, the City will be actively participating in the WDR Steering Committee's Audit Subcommittee and will employ the findings of that subcommittee in the performance of future SSMP audits.

11.3 Roles and Responsibilities

The positions, roles, and responsibilities of the audit staff are as follows:

Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including the management, operation and maintenance of the sanitary collection system. Reports to the City Administrator.
Maintenance Services Superintendent	Responsible for the operation and maintenance activities of the Public Works Department including the sanitary collection system. Reports to the Director of Public Works/City Engineer.
Management Analyst	Responsible for assisting in the development and implementation of the City's WDR programs. Also responsible for the review and revision of these programs.

CHAPTER 12 – COMMUNICATIONS

The discharger should communicate on a regular basis with interested parties on the implementation and performance of its SSMP. The communication system should allow interested parties to provide input to the discharger as the program is developed and implemented.

12.1 Compliance Summary.

The City of Placentia will communicate on a regular basis with interested parties on the implementation and performance of this SSMP. The communication program allows interested parties to provide input as the program is developed and implemented.

The City has disseminated public information on the SSMP and its various elements in numerous ways. SSMP information has and will continue to be disseminated through the City's quarterly newsletter. The City also produces an annual Sanitation Letter. The City conducts approximately 12 public events a year where appropriate SSMP information is made available. The City is currently updating its website to include a separate webpage on both stormwater and sanitation issues. Flyers were mailed to all City property owners discussing the SSMP and its financial needs during the development of the City's sewer service fee. Likewise, flyers are available on stormwater and sanitation issues at City facilities and the public library. The City has held public meetings to disseminate information on the City's FOG reduction program and has participated in the development of the FOG educational toolbox. City field crews have been briefed on the SSMP and its elements so that they may answer questions they might be asked while in the field.

12.2 Compliance Documents

Progress reports with our SSMP development effort are posted on our website at the following address: www.placentia.org. Moreover, the website offers the following reports available as viewable and/or downloadable documents:

- Fats, Oils, and Grease (FOG) Ordinance

12.3 Roles and Responsibilities

The positions, roles, and responsibilities of the communications staff are as follows:

Director of Public Works/City Engineer	Responsible for the management and operation of the Public Works Department, including the operation and management of the sanitary collection system. Reports to the City Administrator.
Maintenance Services Superintendent	Works with the City's Management Analyst to develop informational material and for ensuring Public Works personnel are informed of the City's programs. Reports to the Director of Public Works/City Engineer.
Management Analyst	Responsible for assisting in the development and distribution of the City's newsletters, flyers, and other informational materials.

CHAPTER 13 – GENERAL COMPLIANCE REQUIREMENTS

13.1 Records Maintenance and Access.

The City of Placentia is required to comply with the California Regional Water Quality Board, Santa Ana Region, Order No. R8-2002-0014 (Order), General Waste Discharge Requirements for Sewage Collection Agencies in Orange County Within the Santa Ana Region, as adopted on April 26, 2002.

The Order requires we allow the RWQCB or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

- Enter our premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order.
- Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order.
- Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated under this Order.
- Sample or monitor at reasonable times, for the purposes of assuring compliance with the Order or as otherwise authorized by the California Water Code, any substances or parameters at any location.

The Order is not transferable, except after notice to the Executive Officer. We will submit this notice in writing at least 30 days in advance of any proposed transfer. The notice must include a written agreement between the existing and new owner containing a specific date for the transfer of this Order's responsibility and coverage between us and the new owner. This agreement shall include acknowledgement that we are liable for violations up to the transfer date, and that the new owner is liable from the transfer date on.

13.1.1 Compliance Summary.

As required by the Order, a copy of the Order is maintained at the following location: Placentia City Hall, 401 East Chapman Avenue, Placentia and Placentia City Corporation Yard, 2999 East La Jolla Street, Anaheim and is available at all times to the City's Public Works employees responsible for City's sanitary collection system. There it is available to sanitary sewer system O&M and other personnel at all times. A copy of the Order is also included as Appendix A in Volume II of this Sewer System Management Plan (SSMP). We are prepared to comply with the above listed requirements and to provide required access and documents to authorized personnel upon request.

13.1.2 Compliance Documents.

The SSMP is the primary document for ensuring compliance with the requirements of this section. A copy of the SSMP Volume I and Volume II shall be maintained at the Placentia City Hall, 401 East Chapman Avenue, Placentia with an updated copy maintained at the Placentia City Corporation Yard, 2999 East La Jolla Street, Anaheim, CA.

13.1.3 Roles and Responsibilities.

The City of Placentia staff is responsible for maintaining portions of the SSMP document. A table of SSMP support document and document owners is presented in Volume II of this document. Director of Public Works/City Engineer or his/her designated staff has ultimate responsibility for maintenance of the SSMP document. General SSMP update and management procedures are included in Volume II.

13.2 Reporting Requirements

We will furnish to the Executive Officer, within a reasonable time, any information which the Executive Officer may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. We will also furnish to the Executive Officer of Regional Board 8, upon request, copies of our records required to be kept by this Order.

Pursuant to California Water Code Section 13267(b), we will comply with the attached SSO Monitoring and Reporting Program No. R8-2002-0014 (Program), as specified by the Executive Officer. Monitoring results will be reported at the intervals specified in the Program. A copy of the Program is included in Appendix B of Volume II of the SSMP.

Any person who, without regard to intent or negligence, causes or permits any sewage or other waste to be discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State, as soon as that person has knowledge of the discharge, shall immediately notify the local health officer and the RWQCB of the discharge. Discharges of sewage to storm drains and drainage channels, whether manmade, natural, or concrete-lined, shall be reported as required. All SSOs equal to or greater than 1,000 gallons shall also be reported to the Office of Emergency Services. The discharger (owner) shall propose, as part of the SSMP, a plan and schedule for reporting and evaluating subsurface discharges of sewage from its sewage collection system.

13.2.1 Compliance Summary:

Compliance with these reporting requirements is based on the following documents and activities:

- Prepared SSMP Development Plan and Schedule originally submitted on September 30, 2002 and is included as Appendix C in Volume II.
- OCSD conducted research to develop a subsurface leakage reporting methodology. The City has taken an active role in both supporting and assisting when appropriate in the Exfiltration Study commissioned by OCSD and conducted by the University of California, Irvine, and Brown and Caldwell. A copy of this study named *Status Report on the Development of a Reporting Methodology for Subsurface Discharges of Sewage* is available at the office of the Director of Public Works/City Engineer.
- All staff potentially involved in collection system operation, SSO reporting, document preparation or document management related to this program have attended WDR Awareness Training. City staff attended WDR Awareness Training on May 5, 2005. Training was provided by the Director of Public Works/City Engineer and the City's consultant for the City's Department Heads with additional

WDR Awareness Training provided to all City personnel associated with the City's WDR program. Periodic WDR Awareness Training will be provided in the future as new employees become involved with the program.

- Guidelines have been prepared for SSO reporting to ensure that appropriate monitoring is conducted and that requisite notifications are made. SSO reporting guidelines are included in the City's Spill Response Plan and are carried in several of the Public Works vehicles. The SSO reporting guidelines provide employees with necessary contact information based upon spill volume and spill source. Reporting guidelines are included in the City's SSOERP, also included in Appendix E, Volume II of this SSMP.

13.2.2 Compliance Documents:

The following documents represent compliance with our reporting requirements:

- Exfiltration Study Report. The Orange County Sanitation District, on behalf of its member agencies, commissioned its consultant Brown and Caldwell in conjunction with the University of California, Irvine, to conduct an Exfiltration Research Study to determine the extent and affect of exfiltration from a sanitary collection system. The City has fully supported and participated in this project. This report is called the *Status Report on the Development of a Reporting Methodology for Subsurface Discharges of Sewage* and was submitted on September 30, 2005 by OCSD on behalf of the co-permittees. A copy of this report named *Status Report on the Development of a Reporting Methodology for Subsurface Discharges of Sewage* is available at the office of the Director of Public Works/City Engineer.
- WDR Awareness Training Materials. The City utilizes a PowerPoint presentation for its initial WDR Awareness Training. Additional training is provided through specific PowerPoint presentations and written material that highlight specific aspects of the WDR such as the FOG program. These training materials are under the control of the Director of Public Works/City Engineer.
- SSO Reporting Guidelines. SSO Reporting Guidelines are included in the City's Sanitary Sewer Overflow Emergency Response Plan (SSOERP). In addition to the spill reporting procedures, a single sheet summary of the spill reporting guidelines is included. The SSOERP can be found in Appendix E of Volume II of this SSMP and is available as a stand alone document for use by the City's field employees.

13.2.3 Roles and Responsibilities.

The positions, roles, and responsibilities of the audit staff are as follows:

The implementation of the WDR and its subsequent maintenance and updating is the responsibility of the Director of Public Works/City Engineer. The Director of Public Works/City Engineer may designate a subordinate(s) to assist with this function.

13.3 Sampling and Monitoring Reports

If directed by the OCHCA officer to collect samples after SSOs, monitoring results must be reported on discharge monitoring report forms approved by the Executive Officer. We will maintain records for a minimum of five years from the date of the sample, measurement, report, or application. This period may be extended during the course of any unresolved litigation regarding a discharge or when requested by the Regional Board Executive Officer. All records shall be made available for review upon RWQCB staff's request. All monitoring instruments and devices used by the OCHCA to fulfill the prescribed monitoring program shall be properly maintained and calibrated as necessary to ensure their continued accuracy.

We will retain records of all SSOs, including, but not limited to:

- a) Copies of all original strip chart recordings for continuous monitoring instrumentation (as the City does not maintain any permanent flow recording or monitoring devices, this would only apply during periodic flow studies or monitoring studies conducted by the City).
- b) Service call records and complaint logs of calls received by us
- c) Call records to investigate possible SSOs
- d) SSO records developed by staff
- e) Copies of all reports required by the Order
- f) The location of the overflow point and also the receiving water, if any (street address or, if available, GPS coordinates)
- g) An estimate of the volume of the overflow
- h) A description of the sewer system component from which the release occurred (i.e., manhole, constructed overflow pipe, crack in pipe)
- i) The estimated date and time when the overflow began and when it stopped
- j) The cause or suspected cause of the overflow
- k) Steps that have been and will be taken to prevent the overflow from recurring and a schedule to implement those steps
- l) Work orders from the previous three years which are associated with responses and investigations of system problems related to sanitary sewer overflows
- m) A list and description of complaints from customers or others from the previous three years
- n) Documentation of performance and implementation measures for the previous three years

Records for monitoring of any SSO shall include the date, exact place, and time of sampling of measurements; the individual(s) who performed the sampling or measurements; the date(s) the analyses were performed; the individual(s) who performed the analyses; the analytical technique or method used; and the results of such analyses. All monitoring reports shall be signed by an authorized person as required by Provision H of the Order.

13.3.1 Compliance Summary.

Records management is an important part of Order compliance. We have identified the records required for Order compliance. These records have been reviewed and compared to our existing records retention policy. A summary of this review and updates made to the current policies to accommodate Order compliance is detailed in the WDR Records Retention Review Memorandum, include in Volume II of the SSMP.

13.3.2 Compliance Documents.

The compliance documents include the following:

- SSO Reporting Guidelines describe the parameters for reporting, including conditions that require reporting, timeframes for reporting, and to whom reports are to be submitted. Reporting guidelines are included in the SSOERP and are included in Appendix E of Volume II of this SSMP.
- City of Placentia Records Retention Policy is located at the City Clerks Office and at the Public Works Corporation Yard. The City uses the Local Government Records Retention Guidelines.
- WDR Records Retention Review Memorandum provides guidelines for the required retention time of reports and other documents prescribed under the WDR.

13.3.3 Roles and Responsibilities.

The Records Manager is responsible for identifying record types and initiating records retention policy.

The Director of Public Works/City Engineer is responsible for reviewing and signing all monitoring or other required reports.

The Maintenance Services Superintendent or his/her designate is responsible for the SSO reporting process, recordkeeping and updating of the reporting guidelines under the direction of the Director of Public Works/City Engineer.

13.4 Sanitary Sewer Overflow Reporting

All sewage discharges occurring from our sanitary sewer system that result in a discharge to a storm drain, drainage channel, and/or surface water body shall be immediately reported to the RWQCB by telephone, voice mail (951) 782-4130, or fax (951) 781-6288 as soon as our field staff has verified and is aware of the discharge. Specific information required in this notification is outlined in the Monitoring and Reporting Program (Program), which is included in Appendix B. A copy of the SSO reporting form is included at the end of the Program documentation. We will submit a copy of

this report form for all SSOs from its system within five days of the immediate notification. SSOs to storm drains tributary to Waters of the United States shall be reported as discharges to surface waters. In accordance with the California Water Code Section 13271, OCSD will report all SSOs equal to or greater than 1,000 gallons to the Office of Emergency Services (800) 852-7550. All applications, reports, or information (except for 24-hour SSO reports) submitted to the Executive Officer shall be signed and certified as outlined in the Program.

13.4.1 Compliance Summary.

We have achieved compliance on this requirement. Guidelines have been prepared for staff use, and training has been conducted. Included in the City's SSOERP are the procedures and contact information for reporting all types of SSOs that may occur. This document has been created as a stand-alone document as well being part of the City's SSMP and can be found in City first response vehicles.

If we become aware that we failed to submit to the RWQCB any relevant facts in any report required under this Order, we shall promptly amend the report and submit such facts or information.

13.4.2 Compliance Documents.

The following documents support our reporting compliance:

- SSO Reporting Guidelines are included in the City's SSOERP and are included in Appendix E of Volume II of this SSMP and as a stand-alone document available to Public Works personnel

13.4.3 Roles and Responsibilities.

The following staffed positions provide SSO reporting:

All required reporting to the RWQCB shall be under the signature of the Director of Public Works/City Engineer.

13.5 Other Information

For SSOs requiring enforcement, the City's Code Enforcement or Code Compliance Officer under the direction of the Director of Public Works/City Engineer shall administer such enforcement.

DEFINITIONS

1. **Basin Plan** – The basic water quality management plan developed by each RWQCB for their responsible water shed area controlling stormwater, run-off, and collection systems.
2. **City** – The City of Placentia.
3. **CPC** – California Plumbing Code.
4. **Discharger** – For the purpose of this SSMP, the discharger is the City of Placentia.
5. **FOG** – Fats, oils, and grease that are byproducts of food preparation and are discharged into the City’s collection system.
6. **FSE** – Food service establishment is any establishment involved in the cooking and preparing of food.
7. **MS-4** - Multiple Separate Storm Sewer Systems is a conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, storm drains) owned by the City and/or county and is designed or used for collecting or conveying stormwater.
8. **OCHCA** – Orange County Health Care Agency is responsible for the public health in Orange County. SSOs must be reported to this agency.
9. **OES** – Office of Emergency Services. SSOs over 1,000 gallons must be reported to this agency.
10. **Permittee** – The City of Placentia.
11. **PMC** – Placentia Municipal Code.
12. **Region 8** – The RWQCB that has jurisdiction over the City of Placentia.
13. **RWQCB** – Regional Water Quality Control Board.
14. **Sanitary Sewer Overflows (SSO)** - Any overflows, spills, releases, discharges, or diversions of wastewater from a sanitary sewer system.
15. **Sanitary Sewer System** - Any system of pipes, pump stations, sewer lines, etc., used to collect and convey sewage to a treatment plant. Temporary storage and conveyance facilities (such as vaults, temporary piping, construction trenches, wet wells, impoundments, tanks, highlines, etc.) are considered to be part of the sanitary sewer system, and discharges of sewage to these facilities are not SSOs.
16. **SSOERP** – The Sanitary Sewer Overflow Emergency Response Plan is a written plan describing the emergency procedures that City employees are to follow when responding to an SSO.
17. **SSMP** – Sanitary Sewer Management Plan is a comprehensive written plan that details how the City will manage, operate and maintain its sanitary collection system asset. The SSMP is in response to the WDR.
18. **SSPMP** – Sanitary Sewer Preventative Maintenance Program is the written program describing how the City maintains its collection system.

19. **Volume I** – The SSMP consists of two volumes. Volume I contains the City’s SSMP.
20. **Volume II** – The SSMP consists of two volumes. Volume II contains the backup or supporting documents for the SSMP.
21. **WDR** – The Waste Discharge Requirements are a set of written legal requirements detailing how a sanitary collection system is to be managed, operated, and maintained to reduce or prevent SSOs.