



3.0 OVERFLOW EMERGENCY RESPONSE PLAN

3.1 Introduction

This section of the SSMP provides a summary of the District’s emergency response documents and procedures for sanitary sewer overflows, thus fulfilling the Overflow Emergency Response Plan requirements for both the RWQCB and the SWRCB. Complete documentation of the District’s OERP is included in Appendix 3A

3.2 Regulatory Requirements for Overflow Emergency Response Plan Element

The summarized requirements for the Overflow Emergency Response Plan element of the SSMP are as follows:

3.2.1 RWQCB Requirement:

The collection system agency must develop an overflow emergency response plan that provides procedures for SSO notification, response, reporting, and impact mitigation. The response plan should be developed as a stand-alone document and summarized in the SSMP.

3.2.2 SWRCB Requirement:

The collection system agency shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

- Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;

- A program to ensure appropriate response to all overflows;

- Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, regional water boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach receiving waters in accordance with the Statewide SSO WDR’s Monitoring and Reporting Program (MRP). All SSOs shall be reported in accordance with this MRP, the California Water Code, and other applicable state laws and permit requirements. The SSMP should identify the officials who will receive immediate notification;

- Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the emergency response plan and are appropriately trained;

- Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and



A program to ensure that all reasonable steps are taken to contain untreated wastewater and prevent discharge of untreated wastewater to waters of the United States, and minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

3.3 District OERP

WBSD has revised an Overflow Emergency Response Plan that is in compliance with both SWRCB and RWQCB SSMP OERP requirements. This plan is updated annually by the Regulatory Compliance Coordinator. The full OERP document is included in Appendix A.

3.3.1 WBSD OERP Components Overview

The WBSD OERP contains all the required SWRCB and RWQCB components as well as additional supporting information. The OERP is organized as follows:

- Responsibilities
- Spill Detection
- Spill Response
- Mitigation
- Public Notification
- Water Quality Sampling and Testing
- Spill Investigation and Documentation
- Spill Reporting
- Emergency Response Equipment

Training

3.3.1.1 Responsibilities

This section identifies the responsible parties for responding to all service calls, alarms, and SSO events that occur within the WBSD collection system

3.3.1.2 Spill Detection

This section describes ways that spills are detected, and how these spills are communicated to the District's First Responder, both during and outside of normal working hours. Additionally, flow charts illustrating spill detection, notification, and response communication processes for WBSD are included.

3.3.1.3 Spill Response

This section describes the procedures to be followed when responding to and addressing spills, including priorities; Emergency After-Hours Response (Page 6 of the OERP), initial response; containment or bypass; and special consideration in sensitive areas. This section also includes information and/or additional flowcharts illustrating procedures for handling the following scenarios: customer lateral spills, pipe blockage or collapse, pump around and repair, lift station or treatment plant spills, and backups from hydro cleaning.

3.3.1.4 Mitigation

This section describes procedures for recovery and clean up after sewer flow has been restored, addressing clean up under a variety of conditions including; hard surfaces (exterior), landscaped and unimproved natural vegetation, natural waterways, and private property (interior).

3.3.1.5 Public Notification

This section addresses communications with the public during and after a spill event.

3.3.1.6 Water Quality Sampling and Testing

This section provides information on the Water Quality Monitoring Program for spills greater than 50,000 gallons where analytical testing is required to determine the extent and the impact of an SSO. The written Water Quality Monitoring Program includes an S.O.P. on the Sampling and Monitoring process and required procedures that must be followed. This Program and S.O.P. are located in Appendix A8 of the Overflow Emergency Response Plan (OERP).

3.3.1.7 Spill Reporting

This section includes spill reporting requirements as established by the revised Monitoring & Reporting Program (MRP) which became effective September 9, 2013 by the State Water Board for all leaks, spills, and overflows. Included within this section is information MRP changes and new requirements, and water quality objectives. Flowcharts depicting the necessary procedures for reporting of SSOs are located at Tabs1-7 in the OERP.

3.3.1.8 Spill Investigation and Documentation

This section addresses post-spill assessment, with a focus on implementing processes and improvements that will prevent repeat SSOs and lead to decreased SSOs. The three key elements of post-spill assessment are spill documentation, post-spill debriefing, and failure analysis investigation.

3.3.1.9 Emergency Response Equipment

This section provides a list of specialized equipment that will support the OERP located at Appendix 3A as “Emergency Response Equipment” on page 19, Section 10.



3.3.1.10 Training

This section provides information on the training that is required to support the OERP.

3.4 Additional Items

Additional items included as appendices in the OERP include:

OERP Flowcharts – OERP Appendix A1 to A7

Water Quality Monitoring Program A8

WBSD Overflow Call-Out Report-Emergency Notification List Appendix B1

Sanitary Sewer Overflow Prevention assessment Appendix B2

Compliance Checklist Appendix B3

Overflow estimating methods and the San Diego Manhole Spill Rate Chart-OERP Appendix C1 to C3,

Residential Notification Form Appendix D1

Raw Sewage Spill Sign –Appendix D2