



WEST BAY SANITARY DISTRICT

SEWER COLLECTION SYSTEM

OVERFLOW EMERGENCY RESPONSE PLAN (OERP)

June, 2020

**THE OERP IS A STANDALONE DOCUMENT AND IS ALSO INCLUDED AS APPENDIX-3A TO THE SEWER SYSTEM
MANAGEMENT PLAN**

June 30th, 2020

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LIST OF ABBREVIATIONS

WBSD	West Bay Sanitary District
SSO	Sanitary Sewer Overflow
SSMP	Sewer System Management Plan
OERP	Overflow Emergency Response Plan
RWQCB	Regional Water Quality Control Board, San Francisco Bay Region
SWRCB	State Water Resources Control Board
ABAG	Association of Bay Area Governments
CASA	California Association of Sanitation Agencies
BACWA	Bay Area Clean Water Agencies
SOP	Standard Operating Procedure
WWTP	Wastewater Treatment Plant
Cal-OES	California Office of Emergency Services
DFG	Department of Fish and Game
ERS	Electronic Reporting System
DHS	Department of Health Services
ISDHH	Imminent or Substantial Danger to Human Health
CCTV	Closed Circuit Television
RCC	Regulatory Compliance Coordinator
SMCEHD	San Mateo County Environmental Health Department
PLSD	Private Lateral Sewer Discharge

SECTION 1: INTRODUCTION AND PROJECT BACKGROUND

The West Bay Sanitary District (WBSD, District) is committed to the prevention of sanitary sewer overflows (SSOs). This commitment is reflected in WBSD's record of proactive sewer maintenance and rapid spill response.

In 2005 and 2006, respectively, the San Francisco Regional Water Quality Control Board (RWQCB) and State Water Resource Control Board (SWRCB) established mandatory guidelines for development of Sewer System Management Plans (SSMP). This Overflow Emergency Response Plan (OERP) has been developed as required by the SSMP guidelines, and augments and enhances the District's ongoing efforts regarding SSO prevention and response.

On July 30, 2013 the SWRCB modified the Monitoring and Reporting Program which directly affect the SSMP and became effective on September 9, 2013; those changes have been approved and were incorporated into this OERP.

Related efforts from the following agencies were referenced during the development of this plan.

- Association of Bay Area Governments (ABAG)
- California Association of Sanitation Agencies (CASA)
- Bay Area Clean Water Agencies (BACWA)

1.1 Objectives

The primary objectives of the OERP are to protect public health and the environment, satisfy regulatory agency requirements and waste discharge permit conditions, and minimize the risk of enforcement actions against WBSD by preventing SSOs, where possible, and supporting an orderly and effective response to SSOs that occur notwithstanding the District's best efforts toward prevention. This plan provides guidelines for District staff and others working on behalf of the District, for responding to, cleaning up, and reporting SSOs that may occur in the District's wastewater collection system. Any comments from these entities or others should be considered in future updates to this plan.

This plan does not supersede existing emergency plans or standard operating procedures (SOPs) unless directed by the District Manager.

1.2 Organization of Plan

This 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

SECTION 2: RESPONSIBILITIES

2.1 General

The District responds to all service calls, alarms, and SSO events that occur within the WBSD collection system, including all gravity sewers, force mains, pump stations, and siphons. The District also evaluates and responds to Private Lateral Sewer Discharges (PLSD's); however, maintenance and repair of the private lateral, from the building to the connection to the District mainline sewer, is the sole responsibility of the private property owner.

2.2 First Responder or Incident Lead

The First Responder is the person who responds to the site and is responsible for executing the required procedures of this OERP, except for specific notification and reporting that are handled by the District's Legally Responsible Officials (Water Quality Manager, Operations Superintendent, the Assistant Operations Superintendent, or the District Manager.)

The First Responder is responsible for dispatching any necessary maintenance crews, and for ensuring safe work practices and operations at all events and responses.

The First Responder is "in command" until officially relieved by "senior personnel."

Additional responsibilities of the First Responder are included in Section 4. All processes described in this OERP are also presented in Flowcharts located in Appendices A-1 through A-7

SECTION 3: SPILL DETECTION

This section describes ways that spills are detected, and how these spills are communicated to the First Responder, both during and outside of normal working hours. See Flowchart at Appendix A-1 for Initial Response and Spill Assessment.

3.1 Public Observation

Public observation is the most common way that WBSD is notified of blockages, spills, and sewage system failures. The District's contact information is included on the District website and on the District's vehicles. The District also distributes other public outreach and information materials that include District contact information such as: Business cards, Refrigerator magnets, Brochures, Door-hangers, Flyers, Pins, Balloons, Canvas grocery bags etc.... The District's website address is <http://www.westbaysanitary.org>.

3.1.1 Normal Working Hours

The regular hours of operation for the District are Monday through Friday from 7:00 a.m. to 4:30 p.m., except holidays.

During regular office hours, when the public calls the District's main office, the call is answered by Administrative Personnel. The recipient communicates the information to the primary customer service vehicle (Unit-208) who is the designated First Responder. As soon as the First Responder confirms this is an SSO event they will call out additional support staff as needed and notify the Water Quality Manager, in the event the Water Quality Manager is unavailable they notify the Operations Superintendent. Average response time for responding to SSOs during normal working hours is usually between 5 and 30 minutes.

3.2 Emergency Response After hours

The District operates 24 hours a day, seven days a week. After hours, from 4:30 p.m. to 7:00 a.m., and on weekends and holidays, the District's answering service forwards calls to the assigned on-call maintenance staff, who is the First Responder. The First Responder and members of the maintenance field crew are assigned to on-call responsibilities on a rotating basis. If the First Responder does not answer within approximately two (2) minutes, the next call goes to the Operations Superintendent, if no response within two (2) minutes the Assistant Operations Superintendent is called. Finally, if no one answers a message is left by the callers which then is sent via email to each of the above mentioned responders. (Emergency Notification List is located in the OERP at Appendix-B-1).

It is the policy of the District to be on site within 45 minutes of being notified of a sanitary sewer overflow. The On-call person/First Responder may take the District's Service Vehicle home for after hour and weekend emergency services in order to minimize response time.

Employees that do not live within 35 miles or are unable to respond within the 45 minute window shall find an alternative means to meet this requirement. The District will provide lodging at the Vallombrosa Center, depending on availability, for those who wish to stay in the District while on call.

All sewer system calls, regardless of their nature of anticipated severity, require a response to the reported location of the event. These calls may be related to alarms, sewer overflows, sewer

blockages, residential backups, sewer odors, loose or noisy manhole covers and other related issues.

Once a request or call out for service is received by the on-call person that staff member will ask a series of questions of the caller to ascertain the correct level of response.

In the event the call out is believed to be an SSO, the on-call person shall proceed directly to the site while notifying other personnel to respond with additional supporting equipment to the overflow (Refer to the Order of contact list on the back of the WBSD Call Out Report form MD506 Listed as Appendix B-1).

There are three possible options of response:

- 1) The on-call person may go directly to the site and attempt to clear the mainline blockage with up to a minimum of 150 feet of hand-rods, in an effort to minimize the SSO,
- 2) Upon arrival, the First Responder should set up traffic control measures and contain the SSO to the maximum extent possible while additional resources are in transit to the site,
- 3) Alternatively, the on-call person may drive directly to the Corporation Yard and pick up the Jet/Vac Combo unit, the Hydro-Jet, or the Jetter Trailer, and respond to the site, set up, and prepare to clear the stoppage while the second responder is in transit to the site. The operator may proceed with clearing the stoppage once it's confirmed that the second responder is within the District limits (the second responder must notify the First Responder that they have entered the District, so that they know help is nearby and they can proceed with clearing the blockage).

The on-call person shall always be prepared to utilize option 3, particularly for larger spills that may require additional resources quickly. To assist with this option, the response vehicle can be signed out for after-hour use prior to the end of the normal work day.

3.3 Notification via Alarms

All of the District's pumping facilities are alarmed. Alarms from the pumping facilities are sent to the District's Telemetry System, which then forwards the alarm status to pump station personnel (24 hours a day/7 days a week/365 days a year). Also, the District currently has installed 37 High Water Level Monitors and has 50 Flow Metering devices to monitoring the Collection System that are also monitor for high water levels. The smart cover Alarms are received by on-call personnel, Source Control Inspectors, the Operations Superintendent, and the Water Quality Manager. During normal working hours, the Operations Superintendent confirms that the primary customer service vehicle (First Responder) has received the alarm and is responding. Once the First Responder is on-site, they determine the cause and appropriate corrective measure to mitigate the alarm condition. Once the alarm condition has been mitigated, the Water Quality Manager is notified and resets the smart cover alarm, rearming the SMART cover via the computer system. After hours, the

Water Quality Manager (or his designated representative) confirms the on-call person is responding to and mitigates the alarm condition prior to re-setting the alarm.

3.4 Staff Observations

District personnel conduct daily inspections of the District's sewer system facilities as part of the routine preventive maintenance program. Any problems noted with the sewer system facilities are reported to the Operations Superintendent. Issues related to FOG, odor complaints, and illicit or illegal discharges in the sewer system are communicated further to the Water Quality Department.

SECTION 4: SPILL RESPONSE

This section describes procedures to be followed when responding to and addressing spills, including priorities; initial response; containment or bypass; and special considerations in sensitive areas.

The goal of the District during normal working hours is to be on site in response to a report of an SSO in less than 30 minutes. After hours, the District's policy is to be on-site within 30-45 minutes and to mitigate the SSO within 1 hour. SSOs that require outside agency reporting protocols shall be handled and reported within 2 hours as required by the State.

4.1 Spill Response Priorities

All staff involved in spill response assumes the following responsibilities:

- To follow safe work practices
- To respond promptly with the appropriate equipment
- To relieve the blockage and restore the sewer pipe flow
- To contain the spill wherever feasible
- To minimize public access to and/or contact with the spilled sewage and protect public health
- To promptly notify District personnel of preliminary spill information, documentation of the event, provide field notes/logs, pictures, need for additional help, and potential impacts
- To ensure prompt notification of all appropriate District staff and other potentially affected entities. (RWQCB, Water Suppliers, and City or Town Representatives, etc.)
- To provide traffic and crowd control where necessary
- To return the spilled sewage to the sewer system for safe conveyance to the POTW
- To restore the spill area to a pre-SSO condition

4.2 Safety

The most important item to remember during handling of an SSO is that safe operations always take precedence over expediency or short cuts. This would include Police Assistance (Drive-by) when working at night, also, staff may call a second person for assistance.

Depending on the nature or cause of the overflow/spill, staff may need to perform mechanical or electrical repairs at a pumping station (including but not limited to), remove a mainline blockage with a Vacuum/Jetter truck, Mechanical Rodding truck, perform hand rodding, or repair a damaged section of pipeline. All applicable safety rules and procedures are followed during this work to ensure worker safety.

If a spill appears to contain a hazardous material, call 9-1-1.

Typical responses may require staff to implement the following types of safety procedures:

- Lockout/Tagout of electrical or mechanical equipment for repairs
- Confined space entry procedures
- Trench safety and shoring procedures with supervisory overview of work by others
- Traffic control
- Equipment and/or vehicle operation
- Use of personal protective equipment

There may be times when it is necessary to utilize outside contractors or outside agency staff to restore flow during an overflow event. Although these responders are responsible for their own safety, it is appropriate to reinforce safety concerns, explain the order of work, and assist them with checking of safety equipment before starting the job.

4.3 SSO Response Procedures

All District staff must review and understand the following procedures in advance, and be prepared to implement necessary tasks as dictated by the nature and extent of an overflow. (Training is performed annually and responding to an overflow is considered part of that training). Response will vary depending on the cause of overflow, which could include one or more of the following: blockage of private lateral or sewers; mainline blockage; pump station failure; capacity issues.

The response crew should implement the following steps in a manner that will best prevent or minimize the volume of the overflow.

4.3.1 Initial Response

The First Responder must proceed directly to the site and visually check for potential sewer stoppages or overflows.

All sewer system calls, regardless of their nature or anticipated severity, require a response to the reported location of the event. These calls may be related to alarms, sewer overflows, sewer blockages, residential backups, sewer odors, loose or noisy manhole covers, and other issues.

The District's insurance carrier recommends that responders neither volunteer nor disown District liability. Therefore, responders inform the public and others that liability cannot be addressed until all relevant information has been evaluated by the District Manager, Water Quality Manager, Operations Superintendent, and/or Source Control Inspectors. Responders should be polite and sympathetic to property owners or tenant concerns. Responders should assure the public that District staff is present to assist in expediting the cleanup, regardless of the cause of overflow.

4.3.2 SSO Documentation

The First Responder documents the details on the District's "WBSD Call Out Report" form (MD506), included in Appendix B1, to gather necessary information and to indicate all actions implemented to assess and address the SSO, should the First Responder request the District's Source Control Inspector to be on-site, the Overflow Incident Report is passed on to him/her to track and or complete. Critical information includes the following:

- Obtain information from the On-Call Person including:
 - Name of the property owner or the person who reported the overflow, including address and phone number,
 - Location of the overflow (confirm that overflow is in the District's service area), and
 - Time overflow was detected and any possible exposure hazards.
- Record arrival time and cause.
- Record names of persons on site (and respective organizations, if applicable) at initial response and throughout incident response.
- Record final cleanup efforts and note overflow end time.
- Record time when leaving site.
- Record names and times of others contacted during response efforts.

Take necessary photographs during each phase of the mitigation process.

4.3.3 District SSO Response Actions

Critical activities to complete in response to an SSO include the following:

- Verify the existence of an SSO or backup, and determine the source of the overflow (i.e. mainline or private lateral).
- Notify the Water Quality Manager and/or the Source Control Inspectors immediately if any of the following occur (See Appendix B1- Notification List):
 - Any SSO flowing into the storm drain, ○ SSO of 1,000 gallons or greater in the street, or ○ Identify if the spill is within close proximity to a sensitive area (i.e., surface water body or public area, such as a school).
- Call 9-1-1 if the spill appears to be a hazardous liquid. District responders should not participate in hazardous material spill cleanups.
- Call for District staff assistance, if required. Secure the area by placing cones or barricades around the site (Refer to the Employee Phone Roster for after-hour assistance).
- Block all openings to storm drains to prevent sewage entry or install plugs to contain the SSO within the drainage box. If flow threatens to enter receiving waters, follow requirements of Section 4.6.
- Perform a quick assessment of whether containment would be advantageous for the given spill. If it appears feasible to contain the spill without excessive delay in beginning steps to restore flow, the First Responder should take immediate action as described in Section 4.5.
- Work diligently to relieve the blockage. Record all work performed to mitigate the overflow or remove the source of overflow.
- Initiate bypass or “pump around” concurrently with continued work to remove blockage if, after 15 minutes, it appears that flow will not be quickly restored through cleaning or emergency pipe repair.
- After the blockage is removed and/or overflow otherwise resolved, make every attempt to recover the spilled and/or contained sewage.
- Select the estimation method for calculating the overflow volume by use of; the San Diego method, Surface Area Formula, # of homes upstream of the blockage, SSCSC Method, combined with knowledge of start and end times. Every effort must be documented to determine the start time of the SSO. This may be obtained by interviewing the person who identified and reported the SSO, by interviewing the residents that live near the spill site, or by site conditions, i.e., visual observations, soil saturation depth vs. soil type,

determination on estimated time upstream of the blockage for the system to reach overflow stage etc... Estimation methods are presented visually in Appendix C1-C3. If the start time cannot be established by one of the above methods, 15 minutes will be added to the time the call came in, and will be considered the start time of the SSO.

4.4 Private Lateral Sewer Discharges (PLSD's)

Although the District has a policy of responding to and assisting with the mitigation of every overflow, whether from a public or private system, the property owner is ultimately responsible for overflows that originate from a PLSD's.

- In the case of an overflow from a private lateral or sewer due to a blockage or failure in the private portion of the lateral or sewer, notify the owner or property manager of their responsibility for corrective action and consequences.
- Intervene with private efforts to mitigate only when there is immediate danger to public health or the environment. District response should sufficiently mitigate the danger to public health or to the environment.
- Log all hours worked for proper billing to the property owner.
- The Operations Superintendent or Water Quality Manager will contact the San Mateo County Department of Health Services and appropriate City/Town representative if chronic overflows from the same private lateral location occur.

4.5 Spill Containment or Bypass Measures

Spill containment or bypass measures may be appropriate as a first response, after it is apparent that the blockage cannot be easily or immediately cleared, and before a blockage is cleared and flow restored. Spill containment and bypass measures may involve the following:

- Determine the immediate destination of the overflowing sewage, using local jurisdictional storm drainage maps for isolating, containment, and recovery of spill prior to outfall to waterways.
- Review sewer maps for temporary upstream flow diversion bypassing.
- Plug storm drains where necessary using air plugs, sandbags, and/or plastic to contain the spill, whenever appropriate and feasible.
- Divert spill as required by building a small berm to change direction of flow back to sewer. Use portable spill boom(s) from responding vehicles, dirt and/or sandbags, then recover the overflow using a vacuum truck.

- If flow diversion can be achieved with bypass pumping, install and implement bypass pumping equipment.
- If overflow cannot be diverted or bypassed back into the sewer system, dam/dike or sandbag the spill to provide containment where feasible.

4.6 Response to Flows in Sensitive Areas or Near Receiving Waters

In the event of an overflow is located near a sensitive area or near receiving waters or storm drains that lead to these waters, or for a wet weather overflow caused by insufficient pipe capacity (rather than a blockage), the First Responder will take the following steps in the order shown. These steps should occur concurrently with any continued efforts to resolve the overflow:

- Secure the area by placing cones or barricades around the site.
- Contact the Source Control Inspector immediately as required by the process outlined in paragraph 4.3.1. Inform him/her of the situation; notify him/her of any property damage, public health concerns, and environmental concerns. The Source Control Inspector will notify the required agencies as applicable.
- For SSOs greater than 1,000 gallons, any flow resulting in fish kill, or any flow posing imminent or substantial danger to human health or entering receiving waters, the Source Control Inspector shall contact the California Emergency Management Agency (Cal-OES) SWQCB, SMCEHD, Town or City representative and post the required signage at all access points to the affected area.
- The posted signs may not be removed until cleared to do so by the SMCEHD and or the SWQCB. In addition, staff shall follow public notification guidelines provided in Section 6.
- Block all openings to storm drains to prevent further entry, and block appropriate downstream locations using drain blockers, sand bags, or other dams to minimize or stop flows from entering receiving waters. Make every effort to return the contained spill back to the sanitary sewer system.
- The Water Quality Manager or Source Control Inspector will take the necessary Grab-Samples of receiving waters, complete the “Chain of Custody” (COC) Documentation and submit for laboratory analysis. See Section 7 for sampling requirements.

SECTION 5: MITIGATION

This section addresses recovery and clean up after flow has been restored.

5.1 District SSO Recovery and Clean Up Procedures

After addressing the cause of an SSO and restoring flow, complete the following:

- Post sign(s) warning the public, with the wording “Raw Sewage Spill” at all access points to the affected area and/or as directed by the San Mateo County Environmental Health Department policy for Warning Signage, included in Appendix D2 (Record the location of each posted sign by address or GPS coordinates, so that when approval is given for removal all of the signage is removed).
- Distribute “Residential Notification Form” to all affected properties. Form is contained in Appendix D1 (Record each address notified).
- Recover Spilled Sewage. Using proper containment, dilute, wash, pump, or vacuum spilled sewage and discharge back into the sanitary sewer system. If the spilled sewage cannot be immediately returned to the sanitary sewer system (i.e., it is trapped in a low area or storm drain), then vacuum spilled sewage into a combination unit or pump it back into a sanitary sewer manhole.
- Clean Up and Disinfect. Implement the clean-up and disinfection procedures outlined in Section 5.2 to reduce the potential for human health issues and adverse environmental impacts that may be associated with a SSO event. These procedures are most effective in dry weather conditions and should be modified as required for wet weather conditions.

5.2 Cleaning Hard Surface Areas (Exterior)

This section addresses clean-up activities for overflows caused by backups in the District mainline sewer that cause damage to hard exterior surfaces. Addressing damage caused by private lateral blockages is the responsibility of property owner.

- In exterior hard surface areas, collect all signs of sewage solids and sewage-related materials either by hand (using appropriate PPE) or with the use of rakes and brooms.
- Using proper containment and protection of storm drains, flush the area with water in the amount of three times the overflow volume, and then use a vacuum truck to return the SSO and wash water flows to the sanitary sewer.
- Disinfect all surfaces that were contaminated by sewage using disinfectant solution. Document the product used and application method of disinfectant that was used.
- Allow area to dry. Inspect area for any remaining signs of sewage contamination. Repeat the process if an additional cleaning is warranted.

5.3 Cleaning Landscaped and Unimproved Natural Vegetation

Clean-up of landscaped and unimproved vegetated areas should follow the steps in Section 5.2, but does not require disinfection. Enzymes may be used to disinfect soil surfaces.

5.4 Cleaning Natural Waterways

Contact the SMCEHD and California Department of Fish and Wildlife to obtain requirements for clean-up of spills that occur in or near waterways. Clean up should proceed quickly in order to minimize any potential negative impact. Sewage may cause depletion of dissolved oxygen that can affect or even kill aquatic life.

5.5 Cleaning Private Property (Interior)

This section addresses clean-up activities for overflows caused by backups in the District mainline sewer that cause interior property damage. Addressing interior damage caused by private lateral blockages is the responsibility of private property owner.

- First notify the Source Control Inspector, and then the Water Quality Manager, who will contact the Districts Insurance Carrier who will send out a residential/commercial cleaning contractor.
- Take detailed photographs of affected areas, and uninfected areas.
- Communicate with the owner or tenant that they should avoid contact with the sewage and inform them that assistance has been arranged. Stay on site until cleaning service arrives.
- Advise owner or tenant to contact the Water Quality Manager for further assistance or to answer any questions regarding damage claims.
- When a resident needs alternative accommodation during cleaning operations, advise the resident to contact the Water Quality Manager, who will coordinate hotel or other accommodation through the District Manager and District's insurance carrier.

SECTION 6: PUBLIC NOTIFICATION

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

- In addition to the postings described in prior sections, post signs and place barricades and caution tape as necessary to limit vehicle and pedestrian contact with spilled sewage, with emphasis on protection in public areas (i.e., schools, parks, etc.). Do not remove signs and barricades until directed to do so by the SMCEHD. (Sample results must be at normal background levels, reference baseline sample results, compare with post spill results for contamination assessment)

- In the event that an overflow occurs at night, perform the required duties and re-inspect the location the following day for signs of sewage solids and sewage-related materials that may warrant additional clean-up activities, and post areas as needed.

SECTION 7: WATER QUALITY SAMPLING AND TESTING

Although sampling is not always required, West Bay Sanitary District performs water quality sampling and testing whenever spilled sewage enters a water body (if it is flowing). Testing will be used to determine the extent and impact of the SSO.

Contact the District’s Source Control Inspector for sampling. The Water Quality Manager or his designated representative is responsible for ensuring that receiving water samples are taken.

Confirm that the Source Control Inspector has completed the following:

- Visually monitor, when and where practical, any receiving waters near the location of the SSO for abnormal conditions, such as visible effects to aquatic life, abnormal coloring, etc.
- Obtain water quality samples as soon as possible after the discovery of the SSO event.
- Confirm safety of access location before taking samples.
- Take samples approximately 500-feet upstream of the outfall, at the outfall and 1000-feet downstream of spill, starting at the downstream location. Depending on the volume of the spill additional downstream samples may be required. (Refer to Appendix A8 of the OERP the Water Quality Monitoring Program (WQMP), Appendix A1 Sampling & Monitoring Protocols).
- Deliver samples to San Mateo County Health Department Laboratory for testing for Total Coliform, Fecal Coliform, and E-Coli. Additional sample parameters will be required for spills equal to or greater than 50,000 gallons and analytical parameters are dependent on the wastewater source, (i.e., residential and or industrial areas), and the visual condition of the impacted waterway. The SSO Water Quality Monitoring Program for Spills greater than 50K gallons is located at Appendix A8.
- Implement County Health Department protocols as situation dictates.

For spills less than 50K gallons the sample results shall be reviewed by the San Mateo County Environmental Health Department and the Water Quality Manager. Then the sample data must be compared to the most recent baseline sample results taken by the District’s Source Control Inspectors at specific locations throughout the year. On-going sampling will be required until the results are equal to the most recent baseline results or are at acceptable water quality standards. Upon review of the analytical results, the SMCEHD may request the removal of the posted signs, and declare closure for the spill event. Sampling and testing for spills greater than 50K gallons will require a “SSO Technical Report” as described in section C-5 of the MRP (Additional

sampling for Ammonia, Total Coliform, Fecal Coliform, Enterococcus & e-coli shall be required for these large volume spills. Refer to Appendix A8 (R1).

SECTION 8: SPILL REPORTING

Spill reporting requirements established by the San Francisco Bay Regional Water Quality Control Board became effective December 1, 2004. The requirements were updated on May 2, 2006 by the 2006-003 DWQ and again on July 26, 2013 with an effective date of September 9, 2013. These requirements are listed below and included in Flowchart 7 (Appendix A7). SWQCB reporting requirements are also shown in Flowchart 7.

There are three different categories of spills; Category-1 (any volume reaching a Surface water, drainage channel not fully captured and returned to the sanitary sewer). Category-2 (is greater than 1,000 gallons fully captured and recovered and returned to the sanitary sewer). Category-3 (is less than 1,000 gallons fully captured and returned to the sanitary sewer).

An overflow that has been fully captured and returned to the Sanitary Sewer must be reported within 30-days of the end of calendar month of the SSO.

All leaks, spills, and overflows that are not contained or fully captured must be reported to the CalOES, who will notify several additional agencies including the RWQCB and the SMCEHD. The District will notify the representative of the affected Town or City. The First Responder must ensure that the Source Control Inspector is notified of the spill. In the event that the Source Control Inspector cannot be contacted, the First Responder must ensure that the Water Quality Manager is apprised and submits the necessary reports in accordance with the following guidelines:

- Category-1 SSO resulting in discharge to surface water or drainage channel: Contact CalOES and obtain a Spill Control Number, Cal-OES will notify SMCEHD and RWQCB. Provide updates to the OES as needed. The District must notify the representative of the affected town or city.
- Within three (3) business days, staff must submit a Draft electronic report to the CIWQS. The draft report must be certified within fifteen (15) days of the SSO. Ensure all documentation is identical, field notes, logs, mathematical computations etc. to the information being submitted for the final certification of the report.
- SSO's greater than 50,000 gallons shall require a "SSO Technical Report" which must be submitted within 45 calendar days of the SSO end date. Refer to MRP order # WQ20130058-EXEC Section C-Reporting Requirements number 5-SSO Technical Report (Located at Appendix A8 subsection R1, once all of the information has been entered into the Lucity database a Technical report is available via Crystal reports.)

- All spills shall be included in the written annual SSO report and included in the revised version of the SSMP.
- All spills from the District's sewer system must be reported. The District does not own laterals, reporting of Private Lateral Sewage Discharges (PLSD's) is strongly encouraged when the volume is in excess of 1,000 gallons and or impacting a surface water & voluntary according to the RWQCB and Statewide MRP guidelines. However, Local Code Enforcement and the County Health Department may be notified.

In addition, for all overflows impacting City, other jurisdictional facilities, or private properties, staff should notify the impacted jurisdiction or property owner of the event. If the property owner is not home, then use the Residential Notification Form included in Appendix D.

SECTION 9: 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 the post-spill assessment are spill documentation, post-spill debriefing, and failure analysis investigation.

9.1 Spill Documentation

It is critical that the First Responder completes the internal Overflow Incident Report or passes it on to the Source Control Inspector during the spill event for completion. This form will be filed in the Water Quality Manager's Office, with any other reports and documentation related to the event. Records retention must be at least five (5) years to meet RWQCB requirements. The file should include:

- Initial service call information,
- Internal WBSD Call-Out Report, forms,
- Backup calculations for volume estimate, and SSO start time worksheet estimates
- Appropriate maps showing spill location,
- Photographs of the spill, location, and response activities,
- CIWQS, RWQCB and other related report form(s),
- Water quality sampling and test results, and
- Failure analysis investigation results Post Spill Assessment (PSA)

The WBSD Call Out Report is provided in Appendix B1. Methods for estimating spill volumes, SSO start time worksheet(s) including the San Diego Manhole Spill Rate Chart, are included in Appendices C1-C3.

9.2 Post Spill Event Debriefing

Every SSO event is an opportunity to thoroughly evaluate and improve the District's response and reporting procedures. Each overflow event is unique with its own elements and challenges including volume, cause, location, terrain, and other parameters.

As soon as possible after each SSO event, all responders, which may include office staff, should meet to review the steps taken to report and address the spill. This process should be reviewed in reference to the procedures included in the OERP. Discussions focus on 1) any deviations from the OERP and reasons for such deviation; 2) what worked and where improvements could be made in responding to and mitigating future SSO events; 3) recommended changes to the OERP; and 4) future action items. The results of the debriefing should be documented and tracked to ensure that the proposed action items are completed.

9.3 Failure Analysis Investigation

For every overflow, it is important to understand the cause of the SSO and to identify corrective action(s) needed that will reduce or eliminate future SSOs at this location. The Post Spill Assessment (PSA at Appendix B2)/ investigation includes, at a minimum, the following steps:

Understanding any historical overflow information from the location and reviewing past maintenance records,

- Reviewing available photographs, CCTV footage
- Developing a plan to address or minimize future SSOs from this location. This plan should include the following considerations:
 - If the SSO location is an area that has experienced a problem due to grease or debris, the cleaning schedule may be adjusted and outreach materials may be distributed.
 - Review of grease trap cleaning manifests to confirm compliance with FOG ordinance if SSO is FOG related.
 - Conduct a CCTV inspection within two (2) days of an overflow to determine if a structural problem may have caused or worsened the SSO.
 - If structural damage or other obstruction exists that cannot be removed by District's cleaning crew, schedule for rehabilitation within five (5) days.
 - If the spill resulted from pump station failure or deficiencies, and the Supervisor cannot immediately correct the problem within six (6) hours, formulate a plan of action after mitigation of the incident to prevent future occurrences.

The entire Post Spill Assessment must be completed within 7-days of the SSO event which includes the timeline for the prevention of a repeat SSO from the reported site.

SECTION 10: EMERGENCY RESPONSE EQUIPMENT

This section provides a list of specialized equipment that will support this OERP.

- **Source Control Inspector Vehicles (2):** Carry a variety of line plugs, booms, storm drain mats, pumps, generator, and discharge hose to every SSO.
- **Closed Circuit Television (CCTV) Inspection Unit:** The District's CCTV Inspection Unit is required to evaluate the cause of overflow in lines that have not had issues in the past or to confirm the cause of overflow in lines on accelerated maintenance schedules.
- **Digital Camera/Smart Phone:** A digital camera or Smart Phone is required to record the conditions upon arrival, during cleanup, and upon departure (All Activities).
- **Emergency Response Truck:** A District truck with emergency response equipment obtained from the corporation yard may be required for effective overflow response.

Necessary equipment may include barriers, delineators, warning tape and signboards; plugs and drain inlets mats; sandbags for containment or flow control; lights (for night work); small generator; and other small tools.

Portable Generators: A portable generator and spare pump are available to provide backup power and bypass for the District's constituents in the On-site Wastewater Disposal Zone, and each Raw Sewage lift & Pump stations have Stand-by Power.

- **Portable Pumps and Hoses:** Portable pumps and hoses are available to pump around line failures and lift station failures when required, and to pump spilled sewage and/or contaminated wash water back into the sewer system. For large pump-around requirements, outside contractor assistance may be required.
- **Spare Pipes and Clamps:** Spare pipe, clamps, and other repair equipment are available for emergency pipeline repairs. The District also maintains a list of emergency contractor contact numbers for larger or complex repairs.
- **Rodder Truck:** A truck-mounted power rodder is available to clear root blockages in gravity sewers.
- **Vacuum Truck:** A vacuum truck is available to clear blockages in gravity sewers and to vacuum up spilled sewage and wash-down water.
- **Communications:** District radios, cell phones, or pagers and this OERP are available to facilitate proper communication during emergency response activities.

SECTION 11: TRAINING

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

- **Who receives training:** All District personnel, with emphasis on those who are involved in responding to, reporting, or otherwise addressing SSOs and all new employees. District Contractors are advised on spill response activities and to notify WBSD personnel for assistance should it be required.
- **Updates:** Annually update the OERP. Conduct periodic drills that cover scenarios typically observed during sewer related emergencies (i.e., mainline blockage, mainline failure, lift station failure, by-pass operations, and lateral blockage). The results and the observations during the drills should be documented and action items should be tracked to ensure completion.
- **Record-keeping:** Maintain records of all training that is provided in support of this plan. The records for all scheduled training courses and for each overflow emergency response

training event should include date, time, place, content, name of trainer(s) and names of attendees.

SECTION 12: SUPPORTING DOCUMENTS

- Appendix A1: Flow Chart 1 Initial Response
- Appendix A2: Flowchart 2 Private Lateral Sewer Discharge(s)
- Appendix A3: Flowchart 3 Pipe Blockage or Collapse
- Appendix A4 Flowchart 4 Pump Around & Repair
- Appendix A5: Flowchart 5 Lift Station or WWTP Spill
- Appendix A6: Flowchart 6 Backup from Hydro Cleaning
- Appendix A7: Flowchart 7 Reporting Requirements
- Appendix A8: SSO Water Quality Monitoring Program
- Appendix B1: Overflow Incident Report Form
- Appendix B2: Post Spill Assessment & Follow UP
- Appendix B3: Compliance Checklist
- Appendix C1: Spill Calculation Methods
- Appendix C2: Collection System Maps (# of homes u/s of blockage)
- Appendix C3: San Diego Spill Rate Chart
- Appendix C4: SSO Start Time Estimation Form
- Appendix D1: Residential Notification Form
- Appendix D2: Contaminated Water Sign