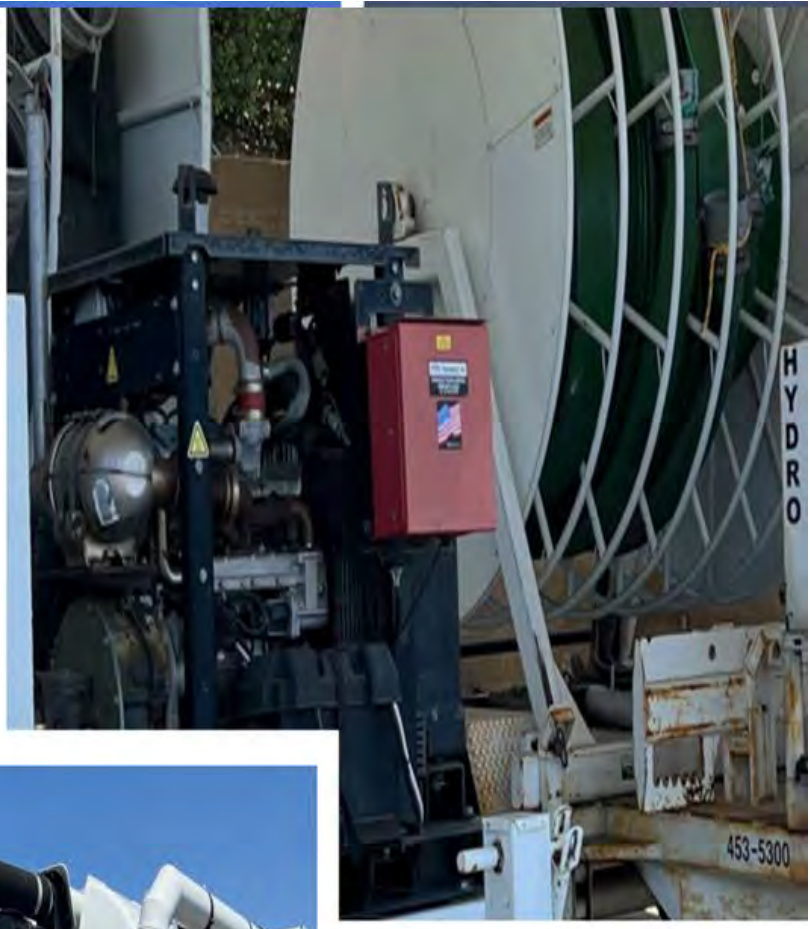
Attachment 1

Spill Emergency Response Plan



SPILL EMERGENCY RESPONSE PLAN (SERP)

UPDATE (MAY 2023)

Irvine Ranch WATER DISTRICT

SERP Review and Approved By	Name/Title	Signature/Date
Legally Responsible Official (1)		
Legally Responsible Official (2)		
Legally Responsible Official (3)		

ACTIVITY CHANGE LOG (SERP)		
Date	Responsible Person/Title	Description Activity/Change

PART 1 (COMPLIANCE GUIDE)

PART 2 (FIELD GUIDE)

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Introduction

This document, the Spill Emergency Response Plan (SERP), formerly known as the Overflow Emergency Response Plan (OERP) has been prepared by Fischer Compliance LLC with assistance from Irvine Ranch Water District (IRWD) staff for complying with one of a series of updated regulatory requirements resulting from the State Water Resources Control Board 2022 adoption of the "reissued" Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems[1] (referred to as "the 2022 WDR" throughout this document."

One primary area of focus by the State Water Board through updated regulatory requirements in the 2022 WDR is *objective compliance* with effective implementation of elements of the IRWD's Sewer System Management Plan (SSMP). The State Water Board emphasizes urgency on the structure, content, and organization of an IRWD-specific SERP for ensuring effective spill, containment, control, and mitigation[2].

The effectiveness of the SERP is measured by the following objectives, providing IRWD-specific translation of the corresponding State Water Board expectations for required effective spill responses:

- Implement effective and proactive spill containment, control, and mitigation
- Comply with State Water Board guidance on SERP implementation (see Attachment 1)
- Reduce future IRWD WDR violations, potential water quality impacts, and nuisances
- Meet/exceed all WDR compliance points in a systematic, streamlined, and transparent manner to facilitate use by Legally Responsible Official(s), Managers, and field staff
- Measure and improve IRWD SERP effectiveness (see Attachment 2)
- Expedite review by Water Board compliance inspectors and prepare IRWD for future regulatory audits of the SERP

These objectives provide the cornerstone for PART 1 (COMPLIANCE GUIDE) of this document, formulated by Fischer Compliance LLC around a streamlined process for objectively reviewing each applicable SERP compliance point, presenting the method(s) for how IRWD is complying with each requirement, and providing customized Key Performance Indicators (KPIs) for IRWD SERP for measuring effectiveness. PART 2 (FIELD GUIDE) includes streamlined procedures for IRWD first responders and field operations staff.

Table 1 below provides a summary of applicable Spill Emergency Response Plan requirements for full compliance with the WDR.

[1] See Order No. 2022-0103-DWQ

[2] See Order No. 2022-0103-DWQ, Attachment D (page D-2) which states *"the State Water Board or a Regional Water Board may consider the Enrollee's efforts in implementing an effective Sewer System Management Plan to prevent, contain, control, and mitigate spills when considering Water Code section 13327 factors to determine necessary enforcement of this General Order."*

Table 1 - Summary of Applicable Spill Emergency Response Plan Requirements

Compliance Point	WDR Section	Page	Regulatory Requirements
1	Spec. 5.7	22	• Allocate necessary resources for spill responses
2-1	5.12	23	• Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023); certify SERP up to date in Annual Report)
2-2	5.12	24	• Targets and measures for protection of public health and environment
2-3	5.12	24	• Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
3	5.13	24	• Comply with Notification, Monitoring, Reporting, Recordkeeping requirements
4	ATT D-3	D-4	• Collaborate with storm drain agencies and ensure easement accessibility agreements for locations requiring operations
5-1	ATT D-4	D-5	• SERP training and practice drills
5-2	ATT D-4	D-4.4	• Inventory of sewer system equipment/identification of critical replacement and spare parts
6-1	ATT D-6	D-6	• Ensure Training/Implementation of SERP for staff and contractors
6-2	ATT D-6	D-6	• Address Emergency Operations/Traffic Control
6-3	ATT D-6	D-6	• Implement technologies, practices, equipment, coordination
6-4	ATT D-6	D-6	• Conduct Post-spill assessments
6-5	ATT D-6	D-6	• Annually review/assess effectiveness of SERP/update
see 2-1 above	ATT D-6	D-6	• Spill Emergency Response Plan/prompt detection/response
see 3 above	ATT D-6	D-6	• Notifications (primary responders, agencies)
see 3 above	ATT D-6	D-6	• Notifications (other potentially affected agencies)
see 3 above	ATT D-6	D-6	• Comply with WDR Att. E1 requirements
see 2-3 above	ATT D-6	D-6	• Containment, minimize/prevent spills to waters of state and drainage conveyances
see 2-2 above	ATT D-6	D-6	• Minimize public health and environmental impacts
see 2-2 above	ATT D-6	D-6	• Remove sewage from drain conveyance
see 2-2 above	ATT D-6	D-6	• Clean spill area/drain conveyance
see 4 above	ATT D-6	D-6	• Implement pre-planned coordination and collaboration with storm drain agencies
see 3 above	ATT D-6	D-6	• Document and report spill events

Compliance Evaluation Inspection

For preparing the SERP, an onsite compliance inspection was completed for assessing IRWD's existing spill prevention, containment, control, and mitigation effectiveness[3]. This included review of the existing Overflow Emergency Response Plan (OERP), spill prevention/reduction strategies, field practices, data collection approach, critical spare parts/inventory, and field staff training. In addition, the inspection included review of data in the State Water Board's "California Integrated Water Quality System" (CIWQS[4]) including agency spill response metrics and benchmarks (see Table 2 below for details).

Table 2 – IRWD spill data and compliance benchmarks

Spill Data	Compliance Benchmarks
• Spill Response Effectiveness (agency notification - operator arrival)	0.50 hours (averaged, 2018-2023) 2.0 hours max (2018-2023)
• Notification Compliance (Category 1 spill notification to Cal-OES)	1 violation (75% compliance, 2018-2023)
• Draft Reporting Compliance (Category 1 spills within 3 business days)	0 violations (100% compliance, 2018-2023)
• Spill Recovery (%) (2018-2023)	Cat 1=18% Cat 2=98% Cat 3=76%

SERP Effectiveness

For measuring effectiveness, numerous Key Performance Indicators (KPIs) were developed for facilitating completion of the required annual review, assessment, and update of the SERP (see Attachment 2).

[3] See Order No. 2022-0101-DWQ, Provision 6.1.6 (Water Boards' considerations for discretionary enforcement purposes)

[4] CIWQS, publicly available at: https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main

COMPLIANCE POINT #1

1-1 Regulatory Requirement

WDR Section	Summary of Requirements
Specif. 5.7 (p22)	• Allocate necessary resources for spill responses

1-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional specific examples detailing how the IRWD is coordinating and allocating its resources for addressing operations, system capacity, reliability, and redundancy, see IRWD SSMP, Chapter 10.

1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #1.

COMPLIANCE POINT #2-1

2-1-1 Regulatory Requirements

WDR Sections	Summary of Requirements
• Specif. 5.12 (pgs23-24)	• Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023) • Certify the SERP up to date in the Annual Report
• ATT D-6 (pgD-6)	• Prompt detection and response to spills to reduce spill volumes and collection information for prevention of future spills. • Containment, minimize/prevent spills to waters of state and drainage conveyances

2-1-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- For procedures with prompt detection and response to spills, reducing spill volumes, and collection information for prevention of future spills, containment, and minimizing/preventing spills to waters of state and drainage conveyances, refer to the IRWD Spill Response Field Guide (PART 2)

2-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #2-1).

COMPLIANCE POINT #2-2

2-2-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Specif. 5.12 (p24)	• Targets for protection of public health and the environment
• ATT D-6 (pgD-6)	• Minimize public health and environmental impacts • Remove sewage from drain conveyance • Clean spill area/drain conveyance

2-2-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- For procedures for minimizing public health and environmental impacts, removing sewage from drainage conveyances, and cleaning spills, refer to the IRWD Spill Response Field Guide (PART 2).

2-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #2-2.

COMPLIANCE POINT #2-3

2-3-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Specif. 5.12 (p23-24)	• Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
• ATT D-6 (pgD-6)	• Containment, minimize/prevent spills to waters of state and drainage conveyances

2-3-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.
- Sewer-related service calls are treated as high priority events that demand a prompt response to the location of the problem.
- Upon notification of a potential sewer overflow, a District Primary Responder is dispatched onsite within 30 minutes during normal working hours and during standby.
- For procedures related to containment, minimizing/preventing spills, and related procedures to waters of state and drainage conveyances, refer to the IRWD Spill Response Field Guide (PART 2).

2-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, see Attachment 2, Compliance Point #2-3.

COMPLIANCE POINT #3

3-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Spec. 5.13 (p24) • ATT D-6 (pD-6)	• Comply with Notification, Monitoring, Reporting, Recordkeeping requirements • Notifications (primary responders, agencies) • Notifications (other potentially affected agencies) • Comply with WDR Att. E1 requirements and document and report spill events

3-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance for through implementation, review, and training on the updated SERP.

- For ensuring timely and effective compliance notifications for potential or actual spills including notifications to primary responders/agencies

- IRWD utilizes an outward-facing contact number (949-453-5300), posted on its webpage, social media sites, and monthly water bills for ensuring customers can report complaints.

- During business hours, IRWD customers first interface with a phone tree by selecting zero to be forwarded to a receptionist who then connects a caller to a field queue where agents are assigned to receive and dispatch calls. Next, customer service creates a field activity note, then communicates to the Collection System Supervisor or Manager, who then dispatches crews.

- After-hours emergency calls use the same contact system, except the after-hours answering service receives calls, then gathers basic information, and forwards it to a primary responder on a standby list. IRWD has multiple disciplines on standby, including Electrical, Mechanical Maintenance, Automation, and Regulatory Compliance for effective emergency responses.

- IRWD monitors pump stations through a 24/7 supervisory control and data acquisition (SCADA) system that is programmed to send an alarm for notifying primary responders.

- IRWD conducts extensive research for its spills for ensuring accurate volume estimations and confirming related supporting data before certification by the Legally Responsible Official (LRO) in CIWQS.

- IRWD procedures include issuance of spill discharge reports for all historic spills. This report provides the CIWQS required data from the spill. Other information that is compiled per event is entered on a SSO spill explanation report that includes an explanation of the event, spill volume calculations, site location map, and any other site pictures.

- For large spills over 50,000 gallons reaching surface waters, IRWD field staff have both methodology and internal procedures in place for responding and monitoring receiving water sampling and monitoring requirements. Staff are prepared to perform sample collections.

- IRWD also has an established communication chain that exists to notify the field staff to conduct sampling should an event occur during and after operational hours. Staff are also trained in the reporting procedures and timelines.

- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #3.

COMPLIANCE POINT #4

4-1 Regulatory Requirements

WDR Section	Summary of Requirements
• ATT D-3 (pD-4)	• Procedures: Collaborating with storm drain agencies
• ATT D-6 (pD-6)	• Implement pre-planned coordination and collaboration with storm drain agencies and other utilities/departments prior to, during and after a spill.

4-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- IRWD also implements procedures for collaboration with storm sewer agencies for ensuring access to storm sewer systems during spill events and preventing unintentional cross connections. This

includes coordinating with the County Area Spill Control (CASC), OCSAN, Costa Mesa City, City of Santa Margarita, City of Lake Forest, City of Tustin, and Newport Coast agencies. IRWD is also establishing informal agreements with storm drain agencies for coordination of spill responses.

- IRWD utilizes the following publicly-available resources for its assessment of spills and collaboration with outside agencies (wastewater, water, stormwater, etc): USGS mapping tool with watershed and topography information[5], California Board Basin Plan Beneficial Use Viewer tool,[6] and the State Water Board eWRIMS tool[7].

- For ensuring compliance with easement agreements, IRWD implement's Section 4.15.1 to 4.15.4 of IRWD's Rules and Regulations.

- For more information on District procedures, refer to the IRWD Spill Response Field Guide (PART 2)

4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #4.

COMPLIANCE POINT #5-1

5-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.3	• SERP training and practice drills

5-1-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP including review of internal response procedures, practice drills, skilled volume estimation, and CIWQS reporting.

- IRWD is conducting ongoing internal and external training, and routinely participates in California Water Environment (CWEA) trainings. For additional compliance details, see section 9.2 above). In addition, for contractor training, once companies are selected to perform work for IRWD, IRWD requires contractors to provide safety plans, confined space plans, and wastewater bypass plans

[5] See https://apps.nationalmap.gov/viewer/
[6] See https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=116f7daa9c4d4103afda1257be82eb16
[7] See https://waterrightsmaps.waterboards.ca.gov/viewer/index.html?viewer=eWRIMS.eWRIMS_gvh#

prior to work. These are reviewed by the Safety Department, Collection System Maintenance, and Engineering prior to commencing project. SSO response is part of their Safety Plan and Wastewater Bypass Plan. In the specification documents. There is a notification list with contacts in case of an emergency (including SSO). If any work involves or requires coordination with pump station operations, IRWD will provide pump station operations staff to support coordination with contractor activities.

- For further improving SSMP implementation and effectiveness, the District has established XX% of its field staff holding CWEA collection system maintenance certifications[8].

- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

5-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #5-1.

COMPLIANCE POINT #5-2

5-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.4	• Inventory of sewer system equipment/identification of critical replacement and spare parts

5-1-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance with an inventory of system equipment, including identification of critical replacement and spare parts.

- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

5-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #5-2.

[8] California Water environmental Association (CWEA), https://www.cwea.org/certification/

COMPLIANCE POINTS #6-1

6-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Ensure training/implementation of SERP for staff and contractors

6-1-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

6-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #6-1.

COMPLIANCE POINT #6-2

6-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Address Emergency Operations/Traffic Control

6-2-2 Compliance/Effectiveness

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

6-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #6-2.

COMPLIANCE POINT #6-3

6-3-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Address Emergency Operations/Traffic Control

6-3-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

6-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #6-3.

COMPLIANCE POINT #6-4

6-4-1 Regulatory Requirement

WDR Page #(s)	Section	Summary of Requirements
Page D-5	ATT D-6	• Conduct Post-spill assessments

6-4-2 Compliance

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- Additional post-spill assessment details include continuous reviewing and update of IRWD field report form; reviewing available spill photographs; reviewing historical maintenance activities; conducting closed-circuit television (CCTV) inspections for determining the condition line segments immediately following a spill and reviewing video/historic logs; and reviewing the results of Fats, Oils and Grease (FOG) source control investigation(s) as appropriate.

- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

6-4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #6-4.

COMPLIANCE POINT #6-5

6-5-1 Regulatory Requirement

WDR Page #(s)	Section	
Page D-5	ATT D-6	• Annually review/assess effectiveness of SERP/update

6-5-2 Compliance/Effectiveness

- The Directors of Regulatory Compliance/ Recycling Operations jointly collaborate for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional procedures, refer to the IRWD Spill Response Field Guide (PART 2)

6-5-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IRWD utilizes Attachment 2, Compliance Point #6-5.

LIST OF ATTACHMENTS

PART 2 (FIELD GUIDE)

LIST OF TABLES

1.0 Respond and Assess

WDR General Order 2022-0103-DWQ Section D-6

IWRD response begins upon notification of the potential spill. The task sequence may vary depending on the circumstance(s) encountered, and the First Responder shall exercise their best judgment while responding to and mitigating the spill's effects. The first responder shall contact their supervisor for direction as appropriate. The First Responder's Goals are to:

- Prevent, contain, control, and mitigate the spill.
- Safely respond to the site as quickly as possible. IRWD's response goal is 45 minutes.
- Thoroughly assess to determine the responsibility, if additional resources are needed, and the best course of action to control and mitigate the spill.
- Collect all required data and document on forms provided.

A. Upon Arrival:

   i. Document the arrival time on the Sewer Spill Response Field Report
   ii. Take a 10-second video of the spilling structure (if currently active)
   iii. Take photos of the affected area

B. Determine Responsibility

   i. Is the problem within IRWD owned/operated Sewer System? If no, proceed to step (C.)
      a. Determine the source, spill category and start notification procedures appropriately. The Collections staff will notify the SPILL Notification group and provide updates on the status of the SPILL event. This group includes both Collections, Regulatory Compliance, and EEC staff contacts.
      b. During business hours, IWRD Regulatory Compliance will make notifications to the responsible regulatory agency. The Collections Division will handle regulatory notification for spills occurring after-hours.
      c. Determine additional response personnel and resources needed.
      d. Attempt to contain or divert the spill.
      e. Setup traffic control measures to divert pedestrian traffic away from the affected area(s)

C. Is the problem due to another agency's facility?

   i. Contact the agency and inform them of the problem (See Table 2, pg.6).
   ii. Attempt to contain the spill and keep the public out of harm's way until the agency's personnel arrive.

D. Is the problem due to a privately-owned facility?

   i. Contact the property manager, owner, or resident and inform them of their responsibility. Recommend they call a plumbing service.

ii. Notify Regulatory Compliance of the private spill
iii. Assist with containment, if necessary, to prevent the spill from entering a DCS.
iv. Document and report the private spill per San Diego Regional 9 General Order No. 2007-005.
v. Contact your supervisor for further directions.

E. Is there a backup in a home or building?

i. Provide resident/business owner with IRWD brochure describing responsibilities and recommendations.
ii. Contact your supervisor.
iii. Contact the Risk Manager or Claims Representative
iv. If the resident refuses clean-up services, request the resident sign a Declination of Services letter.

F. Survey the area and assess the direction of the sewage flow on the ground and the potential destination to help determine containment needs such as:
i. Jetter or combo truck
ii. Assistance (Personnel x___)
iii. Supervisor
iv. Traffic Control/Crowd Control
v. Signage for public notification
vi. Electrical Technician for pump station failures

G. Collect the following minimal information for IRWD Regulatory Compliance Staff. Additionally, document activities and findings on the Spill Response Field Report.
i. Estimated spill volume discharged (gallons)
ii. If ongoing, estimated spill discharge rate (gpm)
iii. Spill incident description
a. Brief narrative
b. Date/time IRWD became aware of the spill
c. Name of responsible sanitary sewer system agency
d. Spill cause (if known)
iv. Indication of whether the spill has been contained
v. Name of surface water impacted by the spill
vi. Any other known spill impacts
vii. Spill incident location (address, city, state, and zip code)

2.0 Spill Categories

WDR General Order 2022-0103-DWQ Section 5.13.1

Individual spill notification, monitoring, and reporting must be in accordance with the following spill categories:

Category 1 - is any volume of sewage from or caused by a sanitary sewer system regulated under the General Order that results in a discharge to:

- A surface water, including a surface water body that contains no flow or volume;
- A drainage conveyance system that discharges to surface waters when the sewage is not fully captured and returned to the sewer system;
- Any spill volume not recovered is considered discharged to surface water unless the drainage conveyance system discharges to a dedicated stormwater infiltration basin or facility;
- A spill from an IRWD-owned and/or operated lateral that discharges to a surface water is a category 1 spill

Category 2 - is a spill of 1,000 gallons or greater from or caused by a sanitary sewer system regulated under this general Order that does not discharge to a surface water.

- A spill of 1,000 gallons out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 2 spill

Category 3 - is a spill of 50 gallons and less than 1,000 gallons from or caused by a sanitary sewer system regulated under this general Order that does not discharge to a surface water.

- A spill of 50 gallons and less than 1,000 gallons that spill out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 3 spill.

Category 4 - is a spill of less than 50 gallons from or caused by a sanitary sewer system regulated under this general Order that does not discharge to a surface water.

- A spill of less than 50 gallons that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 4 spill.

3.0 Contain and Mitigate

WDR General Order 2022-0103-DWQ Section 5.12 and Section D-6, 6.6 & 6.7

Containment of a spill is one of the primary ways to mitigate the effects of the spill. Immediately cover or plug storm drain inlets to divert sewer flow to the containment location. Containment of a spill becomes increasingly difficult once the overflow reaches a drainage conveyance system or a waterway. The quicker the source and extent of the spill can be determined, and the spill contained and/or controlled, the less the impact on the environment and public health. The first responder's decisions should be based on the best action to mitigate the spill's impacts and prevent discharge to surface waters.

Multiple techniques have been identified to contain the spill depending on the circumstances, spill category, and material available. Table 1 lists possible containment options for field crews in no particular order.

Table 1 - Containment Strategies

Location	Strategies for Containment
Curb & Gutter	Create a berm or dam using the following: • Rubber Berm • Dry Sweep • Dirt • Sandbags • Deploy Absorbent Bags
Open Space	• Hand-Dig a trench to contain the spill • Create Sandbag Dam • Create a berm to divert the sewage to a natural low point
Lift Station	• Vacuum retrieve from the wet well using Hydro-Vac • Establish Bypass Operations
Drainage Channel	• Create a Dam using sandbags or dirt • Use vacuum retrieval if accessible by hydro-vac
Strom Drain	• Block inlets using rubber mats and/or sandbags • Plug manhole outlets using pneumatic plugs or sandbags • Plug outfall manhole to prevent discharge into the environment
Backup In Building	• Attempt to remove cleanout caps to allow the sewage to discharge outside the building • Establish containment using the most effective method from above
Creeks/Streams (Low-flow only)	• Create Sandbag Dams • Install a silt fence to contain floating solids • Contact the local health department or Fish and Wildlife for direction NOTE: Containment attempts should not negatively impact aquatic life

4.0 Emergency System Operations

WDR General Order 2022-0103-DWQ Section D-6, 6.5

A. IRWD first responders may need to set up temporary traffic control to protect the public's health and safety in the event of a street collapse or undermining of a roadway. In addition, temporary traffic control allows responding crews to safely contain and clear the blockage and prevent sewage from further dispersing by vehicular traffic. Multiple guides provide information on temporary traffic control, including the Cal Trans Work Area Traffic Control Handbook (WATCH), or the Manual on Uniform Traffic Control Devices (MUTCD). However, temporary traffic control shall be set up based on the agency's training guidelines. Finally, responding crews shall use temporary traffic control devices or barriers to divert the public from contact with the spill.

B. If a spill affects a waterway or ocean requiring the posting of signage, Orange County Public Works will post and remove signage for waterways and beach closures as needed. They will not remove the signs until the spill's effects have been mitigated. Major spills may warrant broader public notice. The Collection Systems Manager and/or Director of Recycling Operations will contact the Director of Public Affairs or the Public Affairs Manager. Public Affairs will create and execute the outreach plan for media. If media crews show up at a job site, IRWD crews will ask media personnel to wait and contact Public Affairs immediately. Do not respond to questions from the media or interview requests unless the Director of Public Affairs or the Public Affairs Manager provides direction and permission. The approval of Public Affairs is required before contacting local media when significant areas may have been contaminated by sewage.

5.0 Correct Cause and Restore Flow

Correcting the cause and restoring flow depends on the type of IRWD infrastructure the spill is discharging from.

A. **IWRD Mainline** - If the blockage is in the main, it will be between a manhole with little to no flow and a manhole surcharging or spilling. Response crews should set up the hydro-vac or jetter truck on the dry manhole, downstream from the surcharged manhole, to clear the blockage and restore flow. If it is difficult to remove the blockage, increase containment or initiate bypass pumping. Request additional assistance to CCTV inspect the line to assess the problem. If needed, contact your supervisor for assistance.

B. **IWRD Sewer Lift Station**- If the station is equipped with an alarm screen, check the alarm status for an indication of a problem. If the station has no power, follow the IRWD procedure until power has been restored. Determine the storage time remaining in the wet well and sewer system; bypass pumping may be necessary.

If power is present, but pumps are not pumping, switch the HOA switch to hand. If pumps start, monitor wet well levels and control them with the HOA switch. Follow agency procedures to notify a Qualified Electrical Worker or Instrumentation & Control personnel.

C. **IRWD Force Main** – When responding to a broken force main, response personnel should immediately shut down the pumps at the lift station affecting the force main and apply lockout -tagout measures to ensure the pumps remain off. The first responder should establish the remaining storage in the wet well and collection system, then (based on agency-specific language) contact the necessary crews to repair the main, set up bypass pumping, or utilize vacuum trucks to control the wet well levels and prevent an additional spill from occurring.

6.0 Spill Specific Monitoring

WDR General Order 2022-0103-DWQ Section D-6, 6.3 & E-1, 2.1

The IRWD shall visually assess the spill locations and spread using photography, a global positioning system (GPS), or other best available tools. In addition, a best practice would be to provide a drawing of the spill spread and dimensions specific to the spill. In the drawing, indicate the spill's final destination or containment point. The IRWD shall document the spill locations, including;

Photography and GPS coordinates for:

- The system location where the spill originated. If multiple spill appearance points exist, use the point closest to the spill origin;
- Include GPS coordinates for the spill destination or containment point if available

Photography for:

- Drainage conveyance system entry locations

- The locations of discharge to surface waters, if applicable
- The extent of the spread, and
- The location(s) of the spill clean up

7.0 Initiate Spill Clean Up

WDR General Order 2022-0103-DWQ Section 5.12 & Section D-6, 6.9

Recovery and thorough clean-up are necessary for all IRWD sewer spills. When recovering spills, all solids and materials should be recovered and removed from the site, and every effort should be made to recover as much of the SPILL as possible. In addition, implement disinfection procedures to reduce the potential for health and human issues and adverse environmental impacts aspillciated with the spill event.

Procedures for cleaning affected areas after a spill are as follows:

A. Back up in Building

1. If a building or structure is flooded due to a failure in the IRWD sewer system, contact the Manager of Contracts Administration and Risk at 123.456.7899
2. If the backup and spill are due to a failure in the agency's system, but the resident refuses the offered clean up services, politely ask the resident to sign a Declination of Cleaning Services letter.** Agency-Specific language, but I feel it's an essential addition for all the agencies that aren't doing this.

B. Street, Curb or Gutter or Hardscape

1. Remove all debris and solids with a broom, rakes, shovels, and wash down water.
2. Before removing any contaminated soil and plants, photograph the area and speak to the property owner.
3. Wash pavement, curb, and gutter area, with the high-pressure wand, then vacuum all wash water with a hydro-vac.

C. Open Area/ Landscape

1. In an open area that is primarily dirt, response crews shall use either a hydro-vac vacuum nozzle, or dig and remove dirt until a dry layer is visible.
2. If the area is a grass-landscaped area, flush the spill area with copious amounts of water and vacuum the area thoroughly. The flushing volume should be three times the estimated spill volume.

D. Natural and Man-Made Waterways

1. Notify Orange County Public Works in the event an SPILL impacts any waterways. Contain contaminated creeks where feasible. Remove all contaminated water by pumping to the

collection system or vacuuming using a vacuum truck and return all collected water to the sewer system. Introduce additional wash water to flush contaminated areas towards the containment area.

8.0 Remove Sewage from Drainage Conveyance System

WDR General Order 2022-0103-DWQ Section 5.12 & Section D-6, 6.8 & 6.9

IRWD response crews shall remove all sewage that has entered the drainage conveyance system by vacuuming all water, debris, solids, and paper in the drainage conveyance system. With containment still in place, flush the affected area with water to the containment location and vacuum water and debris. Depending on agency policy, either hydro jet the affected drainage conveyance system or flush clean water to the containment location where a vac truck is located. Operators should be aware of the drainage conveyance system infrastructure. If the system is in poor condition, then flushing may be a better option in this case rather than hydro-jetting. Once thoroughly cleaned, remove the containment and flush and vacuum the remaining area, capturing all water.

9.0 Regulatory Notification

WDR General Order 2022-0103-DWQ Section D-6, 6.1 & 6.2

If a spill that discharged in or on the waters of the State or discharged to a location where it will probably be discharged to the waters of the State, the IRWD shall notify the Office of Emergency Services (OES) and obtain a control number as soon as possible, but no later than 2 hours after becoming aware of the discharge; and notification can be provided without substantially impeding clean-up or emergency measures. Table 2-3 provide the necessary contacts, both internal and external, to meet the regulatory notification requirements. During business hours, the Regulatory Compliance will make all notifications to regulatory agencies. The Collections division will handle after-hours notification to all regulatory agencies.

10.0 Notification and Reporting

WDR General Order 2022-0103-DWQ Section D-6, 6.3

The notification requirements of this section apply to all spills resulting from a failure or blockage in the IRWD's owned and /or operated sanitary sewer system regulated under this Order. Table 4 will aid field staff, data submitters and the LRO (s) in meeting the requirements for notification and reporting in the re-issued general order.

A. Once the event is complete, Collection staff will provide the draft event summary to be submitted into CIWQS within the required timeframe (See Table 4).

B. Regulatory Compliance will coordinate a review session and a submission meeting with Collection staff and the Legally Responsible Official (LRO) within the required timeframe (See Table 4).

C. IRWD Regulatory Compliance Staff will help facilitate the upload of the final report into CIWQS with the LRO.

Table 2 - IRWD Contact Information

Group	Name	Number	Notes
IRWD Regulatory Compliance	Kyra Barboza	O:949-453-5852 C:714-227-8663	Regulatory Compliance Primary
IRWD Regulatory Compliance	Isabel Melendez	O: 949-453-5816 C: 949-698-0317	Regulatory Compliance Secondary
IRWD Collections	Brandon Joseph	714-797-2954	Collections Primary
IRWD Collections	Primary Standby	657-566-0210	Options if the Primary cannot be reached.
IRWD Collections	Secondary Standby	657-488-4229	

Table 3 - Agency Contacts

Agency	Number	Notes
California Office of Emergency Services (OES)	(800) 852-7550	Obtain a control number and contact name
Regional Water Quality Control Board (RWQCB)	**Santa Ana Region (R8):** • Ryan Harris – (951) 320-2008 • General Line – (951) 782-4130 • After Hours – (951) 782-4130 **San Diego Region (R9):** • General Line – (619) 516-1990	Leave a voicemail and note the date and time.
Orange County Health Care Agency (OCHCA)	• General Line – (714) 433-6000 • After Hours – (714) 628-7008	Verbally notify within 24 hrs if a private spill occurs.
Orange County Public Works (OCPW)	• General Line – (877) 897-7455	Call when discharge reaches water body or not fully captured.
Orange County Sanitation District (OCSD)	• Control Center – (714) 593-7025	
Environmental Engineering Consulting (EEC)	• General Line - (714) 667-2300 • Jim Kolk - (714) 642-8937 (cell) • Joe Jenkins - (562) 447-4109 (cell)	FOG Program consultants. Good resource to have on site especially for private lateral spills.
City Contacts	• Irvine - (949) 724-6000 • Tustin - (714) 549-6913 • Alex Waite – 714-573-3305 (City of Tustin code enforcement) • Orange (714) 744-7444 • Newport Beach (949) 644-3717 • Lake Forest (949) 461-3400	• Call when discharge may affect City property or businesses. These include things like endangering public health, blocking roads, or enters a storm drain to contact the responsible MS4. • Collections will need to provide the proper context to determine who to contact, i.e. the county, city, etc.

Table 4 - Monitoring and Reporting

Spill Category	OES Notification	Monitoring	Draft Report	Certified Report
Category 1 Any volume of sewer discharging to surface water	• Within 2 hours of the IRWD's knowledge of the spill of 1,000 gallons or greater discharging or threatening to discharge to surface waters. • Obtain a Control number from OES	• Conduct spill-specific monitoring. • Conduct water quality sampling within 18 hours of knowledge of a spill 50,000 gallons or greater to surface waters	Due within 3 business days of knowledge or self-discovery of Category 1 spill.	• Due within 15 calendar days of the spill end date. Upon completion, the CIWQS will issue final spill event ID number. • Submit Technical Report within 45 calendar days after the spill end date for spill greater than 50,000 gallons. • Submit the Amended Report within 90 calendar days after spill end date
Category 2 Spills of 1,000 gallons or greater that do not discharge to waters of the State	• Within 2 hours of the IRWD's knowledge of the spill of 1,000 gallons or greater discharging or threatening to discharge to surface waters. • Obtain a Control number from OES	• Conduct spill-specific monitoring.	• Due within 3 business days of the IRWD's knowledge of the spill	• Due within 15 calendar days of the spill end date. Upon completion, the CIWQS will issue final spill event ID number. • Submit Amended reports within 90 calendar days of Certified Report due date

Spill Category	OES Notification	Monitoring	Draft Report	Certified Report
Category 3 Spills of 50 gallons to less than 1,000 gallons that don't discharge to surface waters	• N/A	• Conduct spill-specific monitoring.	• N/A	• Due 30 calendar days after the end of the month in which the spills occurred. After LRO certifies the spill, CIWQS will issue a spill identification number for each spill. • Submit Amended reports within 90 calendar days of Certified Report due date
Category 4 Spills less than 50 gallons that don't discharge to surface waters	• N/A	• Conduct spill-specific monitoring.	• N/A	• Within 30 calendar days after the end of the month in which the spills occurred, certify monthly the volume spilled and the total number of spills. • Upload and certify a digital report of all Category 4 spills in CIWQS by 1 FEB after the end of the calendar year in which the spills occur.

11.0 Receiving Water Sampling

WDR General Order 2022-0103-DWQ Section E-1, 2.3

For IRWD sewage spills in which an estimated 50,000 gallons or greater are discharged into surface water, the IRWD shall conduct water quality sampling no later than 18 hours after the IRWD's knowledge of a potential discharge to a surface water.

In addition, the IRWD shall gather information during and after the spill event to assess the spill magnitude and update its notification and estimated spill volume. The water quality sampling results will enable the district to prioritize areas of concern regarding water quality impacts.

A. Receiving Water Monitoring

Through visual observation, spill volume-estimating and field calculation techniques, the IRWD shall gather and document the following information for spills discharging into receiving waters:

1. Estimated spill travel time to the receiving water
2. For spills entering a drainage system, estimated spill travel time from point of entry to the point of discharge into receiving water
3. Spill travel time can be calculated in the following ways:
    i. Travel time based on design slope of in feet per second (fps)
    ii. Timed water release in the cleaned pipe over the distance traveled
4. Estimated spill volume entering the receiving water
5. Photographs of the following:
    i. Waterbody bank erosion
    ii. Floating matter
    iii. Water surface sheen (potentially from oil and grease)
    iv. Discoloration of receiving water
    v. Impact to the receiving water

B. Water Quality Sampling and Analysis

Surface water samples will be collected using a grab sample technique. Employees must wear new sterile powder-free surgical gloves when collecting all samples.

1. Trigger for Sampling -Water quality sampling is required within 18 hours of initial SPILL notification for Category 1 Spills in which 50,000 gallons or greater are spilled into surface waters.
2. Safety and Access- Water quality sampling should only be performed if it is safe to do so and access is not restricted or unsafe. Unsafe conditions include traffic, heavy rains, slippery or steep creek banks, visibility issues, high-flowing creeks, and limited access due to soil conditions or poor terrain. If access restrictions or unsafe conditions prevent compliance with

these monitoring requirements, the IRWD shall provide documentation of the access restriction or safety hazards in the required report.

3. Where to Sample- The IRWD must use the best professional judgement to determine the upstream and downstream distances based on receiving water flow, accessibility to waterbody banks, and size of visible plume. Collect one sample each day for the duration of the spill. In addition, the IRWD shall collect receiving water samples from the following locations.
    i. A point in the drainage conveyance system before the flow discharges into the receiving water. Label this sample DCS-001
    ii. Point of Discharge into the receiving water where sewage initially enters the receiving water. Label this sample RSW-001
    iii. Upstream Sample – A point in the receiving water upstream of the point of sewage discharge. Label this sample RSW-001U
    iv. Downstream Sample – A point in the receiving water downstream of the point of discharge where the spill is thoroughly mixed with the receiving water. Label this sample RSW-001D

Determine the water velocity present in the body of water during the spill. Dropping debris in the water and timing how long the debris takes to travel a known distance is a good indicator of the water velocity present. Use this information to determine the next downstream sampling point. Then, multiply the water velocity by the spill duration to determine the furthest point downstream to sample.

C. Sampling Procedure

1. Put on the required PPE (safety glasses and latex gloves)
2. **Collect Drainage Conveyance System Sample** – Sample at a point in the drainage conveyance system before the flow discharges into receiving waters
    a. Label this sample DCS-001 and take a picture of the location you are sampling.
    b. Avoid any debris or scum layer from the drainage system.
    c. Fill the bottle against the direction of flow, replace the cap, and secure the sample to avoid contamination.
    d. Use a thermometer to measure the temperature of the sample and record the results
3. **Collect Upstream Sample** - Move approximately 100 feet upstream of the source.
    a. Label the bottle RSW-001U and take a picture of your sampling location.
    b. Sample away from the bank and avoid any debris or scum layer from the surface.
    c. Fill the bottle against the direction of flow, replace the cap, and secure the sample to prevent contamination.

d. Use a thermometer to measure the temperature of the upstream sample location and record the results.

4. **Collect Point of Discharge Sample-** Move approximately 10 feet downstream of the source location.
    a. Label the bottle RSW-001 and take a picture of your sampling location.
    b. Sample away from the bank and avoid any debris or scum layer from the surface.
    c. Fill the bottle against the direction of flow, replace the cap, and secure the sample to prevent contamination.
    d. Use a thermometer to measure the temperature of the source sample location and record the results.
5. **Collect Downstream Sample** – Move approximately 100 feet downstream of the source.
    a. Label this sample RSW-001D and take a picture of the location you are sampling.
    b. Sample away from the bank and avoid any debris or scum layer from the surface.
    c. Fill the bottle against the direction of flow, replace the cap, and secure the sample to prevent contamination.
    d. Use a thermometer to measure the temperature of the downstream sample 1 and record the results

D. **Required Water Quality Analyses** – All samples will be immediately transported to the nearest certified water quality laboratory for analysis. The sample analysis, at a minimum, will include the following:
1. Ammonia
2. pH
3. Electrical Conductivity
4. Bacterial indicators, such as total and fecal coliform, enterococcus, and e-coli, per the regional Basin Plan or as directed by SWRCB
5. Temperature

IRWD Water Quality Lab?? Add contact information here.

E. **Equipment and Supplies** – The following items and PPE are required for sampling:
1. Cooler with Blue Ice
2. Sterile sampling bottles
3. Powder-free latex gloves

4. Safety glasses
5. Marking pen
6. Field log forms

12.0 Final Spill Volume Estimation

WDR General Order 2022-0103-DWQ Section E-1, 2.3

The final spill volume estimation is critical for CIWQS reporting and determines whether additional reporting to regulatory agencies is required. Additionally, the IRWD shall update its notification and reporting of estimated spill volume, including spill volume recovered, as further information is gathered during and after a spill event.

To assess the approximate spill magnitude and spread, the IRWD shall estimate the total spill volume using updated volume estimation techniques, calibration, and documentation for CIWQS reporting. IRWD will refer to volume estimation and other guidelines (see PART 1, Attachments) for to determining spill volume.

13.0 Documentation of Spill Events

WDR General Order 2022-0103-DWQ SectionD-6, 6.13

RIWD Collection Systems management staff will thoroughly investigate and document all spills to enable efficient wastewater collection system management, meet the General Order's reporting requirements, and assess the effectiveness of the emergency response plan. Once the first responder has mitigated the spill, they will complete the Sanitary Sewer Overflow Field Report Form and turn it in to the Collection Systems Supervisor. Collection Systems management will then assemble all available documentation for review and complete a draft report of the spill documenting all field activities. Collections Systems management will submit an internal report to the IRWD Regulatory Compliance Staff when finished. IRWD Regulatory Compliance Staff will enter all required information into the California Integrated Water Quality System (CIWQS) online reporting system, and the LRO will certify the report in CIWQS.

A. Upon completion of the spill event, an IRWD electronic file for each individual spill will be prepared, including the following information where appropriate:
   - Initial service call information;
   - Spill Response Field Report;
   - Volume estimate;
   - Map showing the spill location;
   - Photographs of spill location;
   - CCTV inspection data, if applicable;
   - Water quality sampling and test results, if appropriate;
   - Spill event investigation results; and
   - Any other forms related to the spill.

B. Private Spill Documentation

IRWD Collection Systems management will complete the Private Spill Response Report form and provide a draft report to Regulatory Compliance. In addition, Collection Systems management will assemble all available documentation and review, complete, and submit an internal report of all available information to IRWD Regulatory Compliance Staff via e-mail. A separate electronic file will be prepared for each individual private spill. The file will include any relevant information from the above list.

(For additional references, please refer to SERP PART 1 (COMPLIANCE GUIDE).

Attachment 1 —WDR Implementation guidance (SWRCB)

The SERP implementation guidance provided by the State Water Board in this attachment is designed for helping sewer managers comply Order No. 2022-0103-DWQ.

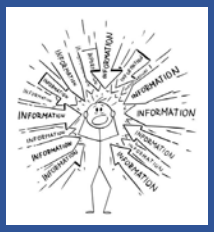
Newly-Reissued
Statewide Sanitary Sewer Systems General Order
Effective June 5, 2023

Diana Messina, P.E., Regulatory Manager
State Water Resources Control Board

April 26, 2023 Roseville Training Event

1

Today's Regulatory Presentations



Initial 15 minutes – *Address information overload*

December 2022

- **The State Water Board reissued the Statewide Sanitary Sewer Systems General Order in its entirety**
- **Order becomes effective on June 5, 2023**
  - ***Everything is <u>not</u> due on June 5th***
- **Walk-thru Upcoming Compliance Items for Existing Enrollees**
  - **Due prior to June 5, 2023**
- **Overview of Longer-term Compliance**

Sit back, listen, ask questions, provide your examples.
Copy of presentation will be made available to all attendees

2

Today's Regulatory Presentations

Later Presentation
Get into the weeds with needed clarification

- **"Regulatory Basics"**
- **Overview of the Reissued Order**
  - To understand the high-level changes and increased enforceability
  - To understand the Order Organization - Identifying Critical Sections
- **Why the Spill Emergency Response Plan is a Short-term compliance item?**
- **Examine approaches to the expanded Legally Responsible Official Designation**
- **Open Question and Answer Forum**

Sit back, listen, ask questions, provide your examples.
Copy of presentation will be made available to all attendees

3

Short-Term Compliance Due Dates For Existing Enrollees

April 5 – June 4, 2023 (60-day window)	Item 1: Electronic Continuation of Regulatory Coverage to Reissued Order Current Legally Responsible Official Certifies in California Integrated Water Quality System (CIWQS)
June 5, 2023	Reissued Order is In Effect 2006 and 2013 Orders are rescinded
Due by June 5, 2023	Item 2: Existing SSMP must be uploaded into CIWQS Item 3: Spill Emergency Response Plan must be updated for implementation Item 4: All Spill Reporting per Reissued Order Item 5: Legally Responsible Official per Reissued Order

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Short Term Compliance

April 5 – June 4, 2023

Item #1: Electronic Continuation of Regulatory Coverage to Reissued Order

IMPORTANT!!!

90 and *60-day Notices issued to all LROs in CIWQS records*

Staff available today to assist an LRO in continuing coverage today!

Please spread the word to other agencies!

If missed:

- *Full loss of regulatory coverage starting June 5th until a full application package is submitted and approved*
- *Potential enforcement for no coverage*
  - *(Note – compliance records are now electronic)*

CALIFORNIA WATER BOARDS State Water Resources Control Board

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To Certify Continuation of Existing Regulatory Coverage

(Available since April 5th in CIWQS)

Current Legally Responsible Official logs into established CIWQS account

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To Certify Continuation of Existing Regulatory Coverage
(Available since April 5th in CIWQS)

- Collection System Annual Report ?
  Pertinent information regarding your collection system.
- Sewer System Management Plan Update ?
  Certify Sewer System Management Plan completion
- Reporting New Spill ?
  Submit Individual Spill Reports.
- Reporting New Private Lateral Sewage Discharge ?
  Submit Individual Private Lateral Sewage Discharge Reports.

Continuation of Existing Regulatory Coverage Certification
(must be completed by June 4, 2023)

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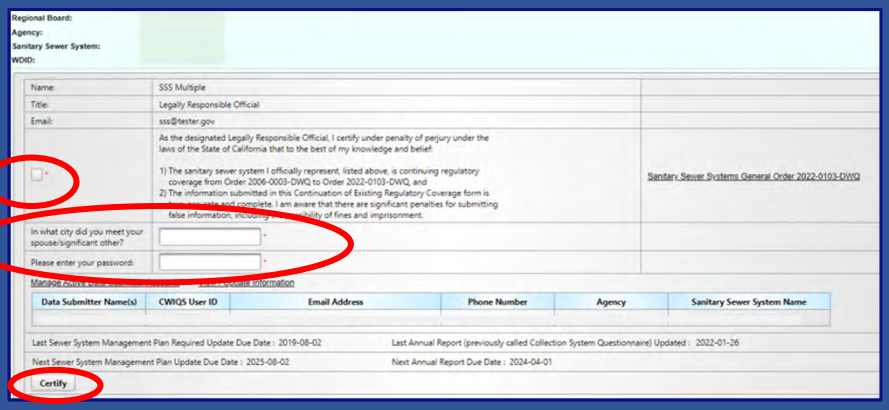
To Certify Continuation of Existing Regulatory Coverage



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Confirmation Message and Email
Continuation of Existing Regulatory Coverage

- Collection System Annual Report ?
  Pertinent information regarding your collection system.
- Sewer System Management Plan Update ?
  Certify Sewer System Management Plan completion
- Reporting New Spill ?
  Submit Individual Spill Reports.
- Reporting New Private Lateral Sewage Discharge ?
  Submit Individual Private Lateral Sewage Discharge Reports.

2023-04-26 10:07:45 [LRO Name] certified that the [Enrollee Name] is continuing regulatory coverage from General Order 2006-0003-DWQ to General Order 2022-0103-DWQ

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Short Term Compliance by June 5, 2023

Item #2: Existing Sewer System Management Plan (aka SSMP) must be uploaded into CIWQS

(If files size too big – insert link to online SSMP)

CALIFORNIA WATER BOARDS State Water Resources Control Board

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Uploading Existing Sewer System Management Plan
Available since April 5th in CIWQS

Current Legally Responsible Official logs into established CIWQS account

11

11

Upload Existing Sewer System Management Plan documents
Available since April 5th in CIWQS

12

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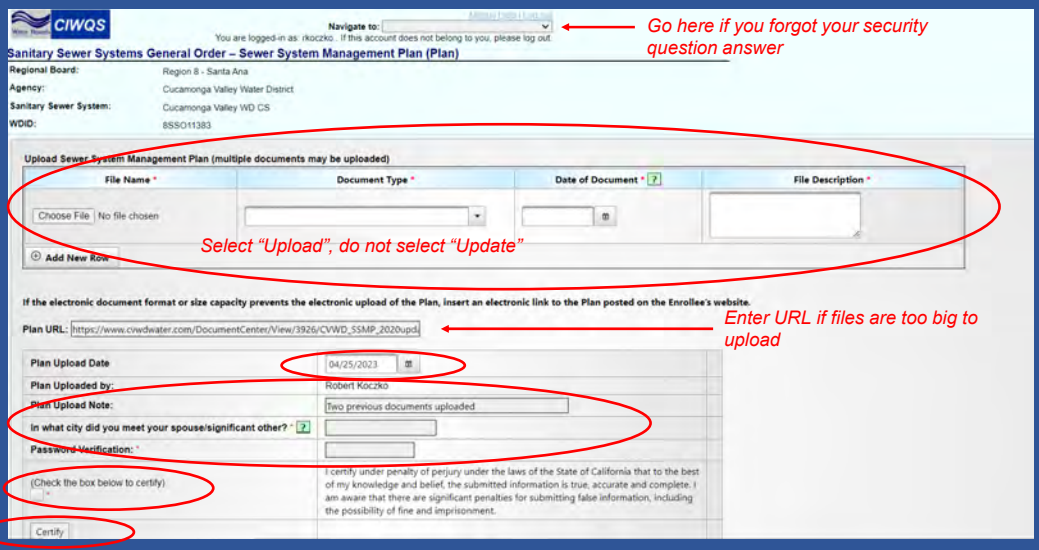
Upload Existing Sewer System Management Plan documents



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Short Term Compliance by June 5, 2023

Item #3: Spill Emergency Response Plan must be updated and implemented

(Not required to be submitted to CIWQS)

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Short Term Compliance by June 5, 2023

Item #4: Legally Responsible Official Designation in CIWQS per expanded qualifications in reissued Order

Questions for Audience

How many LROs here today?

How many LROs have viewed if they meet expanded qualifications in reissued Order?

How many enrollees here have concern that they will not be able to comply with the new LRO qualifications?

15

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Longer Term Compliance

(preparation is key)

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Preparing for Longer-Term Compliance

February 1, 2024 April 1, 2024	Annual Reporting of Cat 4 and Lateral Spills First Annual Report Submittal with 10-year performance graph	• Annual Report replaces existing Questionnaire
2024 or 2025	End of Audit Period Audit Reports due 6 months later	• Audit to identify gaps in SSMP • Audit Report to be Uploaded into CIWQS
July – Dec 2025 2025 or 2026	Service Area Boundary Map Sewer System Management Plan Update	Both to be uploaded into CIWQS Updated Plan w/ additional system-specific elements required in Attachment E

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More Details

In next presentation

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Diving Deeper Into the Newly-Reissued

Statewide Sanitary Sewer Systems General Order

Effective June 5, 2023

Welcome back!
Diana Messina, P.E., Regulatory Manager
State Water Resources Control Board

April 26, 2023 Roseville Training Event

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This Presentations

Get into the weeds with needed clarification

- **"Regulatory Basics"**
- **Overview of the Reissued Order**
  - High-level changes and increased enforceability
  - Navigating through the Order - Identifying Critical Sections
- **Why Spill Emergency Response Plan is a critical Short-term compliance item?**
- **The expanded Legally Responsible Official Designation**
- **Open Question and Answer Forum**

Sit back, listen, ask questions, provide your examples.
Copy of presentation will be made available to all attendees

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Regulatory Basics

The Clean Water Act

The California Water Code

The State Water Resources Control Board

The Nine Regional Water Quality Control Boards

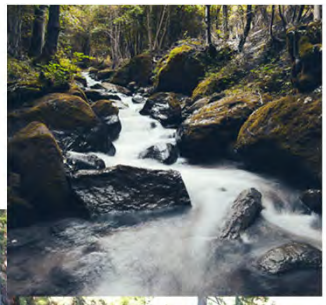
Federal

The 1972 Clean Water Act (CWA)

.

1972 - Congress enacted the Clean Water Act

- *The primary federal law governing water quality*
- *To address pollution in the nation's waters and tributaries.*
- *Prohibits discharge of pollutants to a waters of the United States except as authorized by an NPDES permit*



What is a Water of the United States?

Federal

A surface waterbody with deemed national importance to the United States:

- *Oceans, rivers, streams, lakes, creeks, marshes, wetlands, vernal pools, etc.*
- *Considered "jurisdictional" under the Clean Water Act*
- *In the regulatory jurisdiction of the United States Army Corps of Engineers (USACE)*

CALIFORNIA WATER BOARDS
State Water Resources Control Board

Is a Dry Waterbody a Water of the United States?

Federal

Yes. A waterbody that is deemed a water of the U.S. is a water of the U.S. whether or not surface flow exists (surface and subsurface flow)

Many surface waters are hydrologically connected to shallow groundwater

Groundwater feeds surface water when levels are high

Surface water flows feed groundwater when groundwater levels are low

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California Water Code (WC)

State

State regulations that regulates pollution discharges to our Waters of the State.

Surface waters

- *Pacific Ocean*
- *Rivers, streams and creeks*
- *Manmade infrastructure conveying natural flows,*
- *Vernal pools, marshes and wetlands,*
- *Washes and Sloughs*
- *Lagoons and Estuaries*
- *Other*

Waters of the U.S. (federal surface waters) are a subset of Waters of the State

Groundwater

Statewide Sanitary Sewer Systems General Order

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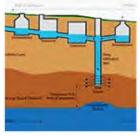
How would a sewage spill enter groundwater?

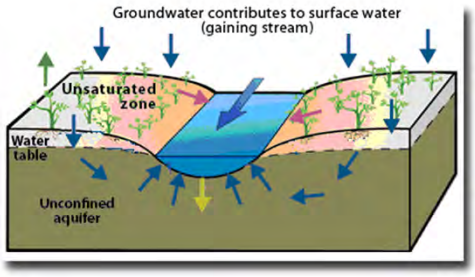
1. Through engineered infrastructure specifically designed to maximize infiltration of stormwater



CALIFORNIA WATER BOARDS State Water Resources Control Board

How would a sewage spill enter groundwater?

2. Through a hydrologically connected surface water body
   - A gaining stream
   - A losing stream



CALIFORNIA WATER BOARDS State Water Resources Control Board

What are the State Water Resources Control Board and Nine Regional Water Quality Control Boards

10 Governor-appointed Boards established by the Water Code

<u>The State Water Board</u>

- Regulates statewide water quality, water rights and drinking water

<u>The Nine Regional Water Boards</u>

- Regulate water quality within own region (primary watershed)
- Enforce State Water Board statewide Orders

Statewide Sanitary Sewer Systems General Order

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Nine Regional Water Quality Control Boards

- <u>Nine Regional Water Boards</u>
  - Regulate water quality within own region (primary watershed)
  - Enforce Statewide Orders and their Regional Water Board Orders
    - Per 2017 State Water Board Enforcement Policy

Statewide Sanitary Sewer Systems General Order 30

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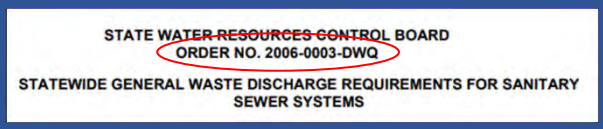
How are Sewage Spills Regulated?

Per Water Code Authority

- State Water Board adopts statewide Waste Discharge Requirements (WDRs or General Order)
- Nine Regional Water Boards enforce the statewide Order
  - In 2006


STATE WATER RESOURCES CONTROL BOARD
ORDER NO. 2006-0003-DWQ
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

Item 8. *It is the State Water Board's intent to gather additional information on the causes and sources of SSOs to augment existing information and to determine the full extent of SSOs and consequent public health and/or environmental impacts occurring in the State.*

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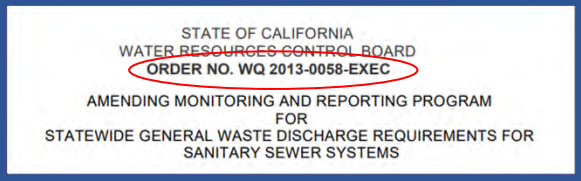
How are Sewage Spills Regulated?

Per Water Code Authority

- In 2008


STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
ORDER NO. WQ 2008-0002-EXEC
ADOPTING AMENDED MONITORING AND REPORTING REQUIREMENTS FOR STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

- In 2013


STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
ORDER NO. WQ 2013-0058-EXEC
AMENDING MONITORING AND REPORTING PROGRAM FOR STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

Item 10. *Based on over six years of implementation of the SSS WDRs, the State Water Board concludes that the February 20, 2008 MRP must be updated to better advance the SSO Reduction Program objectives, assess compliance, and enforce the requirements of the SSS WDRs.*

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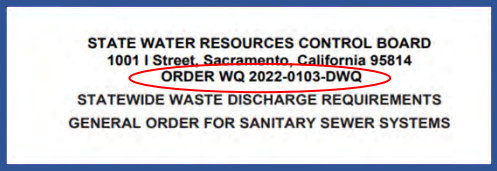
State Water Board *Reissued* the Statewide Order Regulating Sewage Spills

- Dec 2022

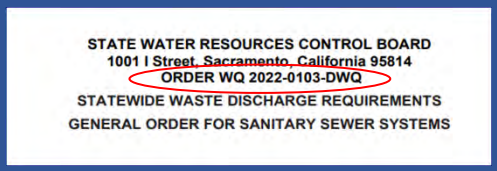

STATE WATER RESOURCES CONTROL BOARD
1001 I Street, Sacramento, California 95814
ORDER WQ 2022-0103-DWQ
STATEWIDE WASTE DISCHARGE REQUIREMENTS
GENERAL ORDER FOR SANITARY SEWER SYSTEMS

Section 3. Findings addressing, at minimum:

- Water Code Authority to protect waters of the State and their beneficial uses
- Need for Proactive System Management
- Protection of our Drinking Water Supply
- Climate Change Impacts on Infrastructure and Regulatory Programs
- Human Right to Water for all Californians
- Open and accessible data

Reissued Statewide Waste Discharge Requirements (General Order)

- Dec 2022


STATE WATER RESOURCES CONTROL BOARD
1001 I Street, Sacramento, California 95814
ORDER WQ 2022-0103-DWQ
STATEWIDE WASTE DISCHARGE REQUIREMENTS
GENERAL ORDER FOR SANITARY SEWER SYSTEMS

Continues Existing Regulatory Structure of 2006 Order

- Effective on June 5, 2023
- 2006 and 2013 Orders currently still in effect
- On June 5, 2023:
  - The 2006 and 2013 Orders are rescinded (no longer in effect)
  - Re-issued Order supersedes the 2006 and 2013 Orders

Reissued Statewide Waste Discharge Requirements (General Order)

The reissued Order is not a new Order:

- Continues regulating the same type of public systems plus private systems, as applicable
- Updates the 17-year-old statewide Order to:
  - Clarifies existing Water Code authority:
    - Addresses spills to waters of the State (surface and groundwater)
    - Addresses climate change impacts on a system-specific level
  - Reduces some spill reporting frequencies
  - Extend audit and planning periods

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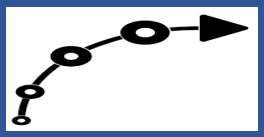
16-year Evolution: 2006 - 2022



Focus of 2006 Order	Expanded Focus of Reissued Order

• Clean Water Act
  • Spills to waters of the United States
• Spill Reports
• Development of a Sewer System Management Plan (SSMP)
	• Clean Water Act and Water Code
	  • Spills to waters of the States (includes waters of the U.S.)
	• Spill Reports
	• Development and effective implementation of SSMP
	• Emphasize on "system-specific"
	• Long-term system resiliency
	• Adaptability of utility management to address changing impacts

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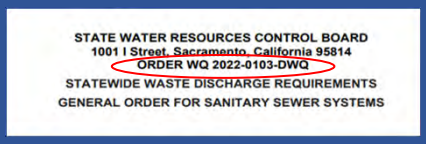
Enhanced Enforceability



Reissued Order requires:

- Full electronic reporting into CIWQS
  - Spill Reports
  - Audit Reports
  - Sewer System Management Plans
- Enhanced Legally Responsible Official qualifications
- Enhanced Penalty of Perjury clause in CIWQS when electronically submitting reports

Regional Boards will have electronic CIWQS reports of non-compliance

Goal – public transparency of sewer system compliance

High-level Order Changes

1

High-level *Administrative Changes* in Re-Issued Order

- Structure of Order – One document
- Streamlined transfer of existing Enrollee enrollment
- Expanded scope for regulating privately-owned systems (Regional Boards discretion)
  - Clarification for federally-owned facilities
- Enhanced qualifications for Legally Responsible Official
  - To certify compliance with entire Order

2

High-level *Regulatory Changes* in Re-Issued Order

- Clarified definition of "Spill"

  A discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system overflow, operational failure, and/or infrastructure failure.

- Clarified prohibition of sewage to a surface water unless properly cleaned up and reported
- Prohibition of sewage to waters of the State (Full implementation of Water Code compared to only waters of the U.S.)

3

High-level *System Management* Changes in Re-Issued Order

Additional SSMP Elements

- Emphasis on:
  - Implementation of effective SSMP
  - Effective Emergency Spill Responses to minimize sewage to waters of the State
  - Examination of system-specific climate change impacts to proactively address causes of future spills
  - Problem system areas identified by condition assessment data and previous spill information
  - Further source control for wipes, rags, debri and other causes of blockage
- Prioritization of capital improvement projects based on data from condition assessments, past spills, etc.

Note – SSMP Element subjects did not change
SSMPs do not need to be re-written

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High-level *Notification and Monitoring Changes* in Re-Issued Order

- 2-hour CA Office of Emergency Service notification of Category 1 and 2 Spills (>1000 gallons)
- Water quality monitoring within 18 hours of knowledge of spill
- Enhanced data collection of spill observations
- Clarified receiving water monitoring for >50,000 gallon spills to surface waters
- Use of Environmental Laboratory Accreditation Program (ELAP)-certified lab for sample analysis

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High-level *Reporting Changes* in Re-Issued Order

- Full electronic reporting in CA Integrated Water Quality System (CIWQS) for compliance determination
  - Existing Sanitary Sewer Management Plan
  - Individual spill reports
  - Future Audit Reports
  - Sewer System Management Plan Updates
- Reduced reporting frequency of small spills and of spills from agency-maintained laterals
- Annual Report (in place of questionnaire)
  - Includes system-specific spill performance graphs for Enrollee to report system performance
- Longer periods between audits and sewer system management plan updates

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General Order Organization

Identifying Critical Sections

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General Order Organization

Informational

Sections for information and clarification only

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General Order Organization

Critical sections containing compliance requirements for Enrollees

Important to understand and implement

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For clarification of terms

For quick reference

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Let's look at Section 4. Spill Prohibitions

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Section 4. Prohibitions

4.1. Any sewage discharge that has the potential to discharge to surface waters *unless promptly cleaned up and reported*.

Not all spills violate a Prohibition

An effective Spill Emergency Response and coordination with storm drainage agency:

- May capture and cleans up entire spill –
  - Eliminating a violation of prohibition
  - Eliminating basis for 3rd party CWA lawsuit
- May minimize amount of sewage to receiving water
  - Potential reduction in monitoring and enforcement

Note – a municipal storm conveyance system is (typically) not a surface water

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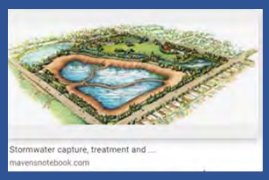
Section 4. Prohibitions

4.2. Any sewage discharge directly or indirectly through a drainage conveyance system or other route, to waters of the State.

Importance of coordination with local storm drainage agency:

- Know where your spill is going
  - Spills to dedicated groundwater recharge is not a violation of Prohibition 4.1
  - Avoid erroneous report of spill as a federal violation
  - Eliminate potential basis for 3rd party CWA lawsuit

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Section 4. Prohibitions

4.3. Any sewage discharge that creates a nuisance or condition of pollution.

See definition in Attachment A

Nuisance: For the purpose of this General Order, a nuisance, as defined in Water Code section 13050(m), is anything that meets all of the following requirements:

- Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property…;
- Affects at the same time an entire community or neighborhood, or any considerable number of persons…;
- Occurs during, or as a result of, the treatment or disposal of wastes.

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Overview of Section 5. Specifications

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CALIFORNIA WATER BOARDS State Water Resources Control Board

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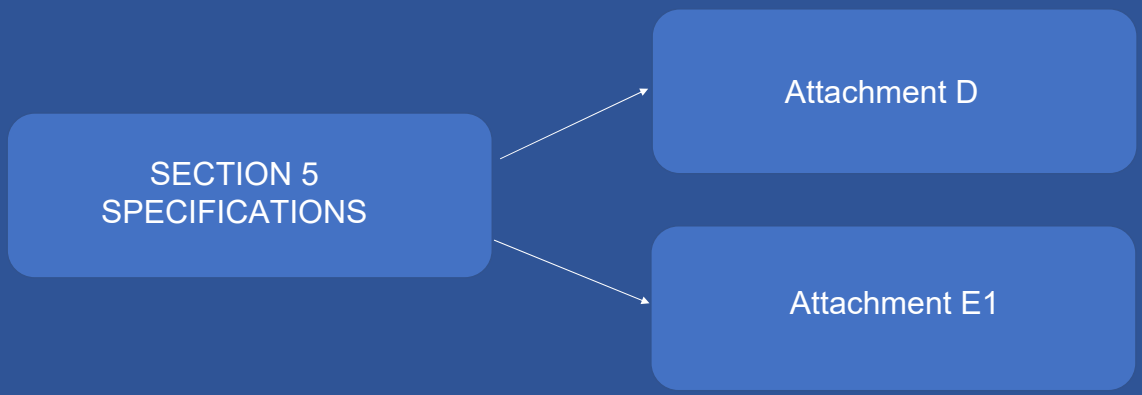
Section 5 – Provides all Requirements

Attachments D and E1 - Provide Requirement Details



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Be very familiar with these sections

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Quick Overview of

Section 5. Specifications

5.1 & 5.8: Designation of a Legally Responsible Official and Data Submitters

5.2 - 5.5: Sewer System Management Plan and Audit requirements

5.6: System Resilience

5.7: Allocation of Resources

5.9: Reporting Certification under penalty of perjury

5.10: System Capacity

5.11: System Performance Analysis (running 10-year)

5.12.: Spill Emergency Response Plan and Remedial Actions

5.13: Spill-specific Notification, Monitoring, Reporting and Recordkeeping Requirements (including Spill Categories)

5.14: Electronic Boundary Map

5.15 - 16: Voluntary Reporting

5.17-10: Other

IMPORTANT!!!

Implementation is "system-specific" (find/count)

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Be familiar with Updated Spill Categories in Section 5.13.

Category 1

Any volume of sewage that discharges to:

- **A surface water**, including a surface water body that contains no flow or volume of water, or
- A drainage conveyance system that discharges to a surface water, when the sewage is not fully captured and returned to the sewer system or disposed of properly.

Category 2

A spill of 1,000 gallons or greater that does not discharge to a surface water.

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Updated Spill Categories in Section 5.13., continued

(Existing Category 3 separated for reduced reporting of small spills)

2006 Order

Category 3

A spill of less than 1000 gallons, that does not discharge to a surface water.

Reissued Order (2022-0103-DWQ)

Category 3

A spill equal to or greater than 50 gallons, and less than 1000 gallons, that does not discharge to a surface water.

Category 4

A spill of less than 50 gallons that does not discharge to a surface water.

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Notifications, Monitoring, Reporting and Recordkeeping Requirements

- Attachment E1: Contains all detailed requirements per Categories
  (fully replaces 2013 Order)
- Attachment E2: Summary of Spill-specific Requirements
- *Five Tables for Quick Reference - with section reference to Attachment E1*

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Back to Short-Term Compliance Due Dates

Upcoming Compliance Dates for Existing Enrollees

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Focus on Short-Term Compliance

April 5 – June 4, 2023 (60-day window)	✓ Item 1: Electronic Continuation of Regulatory Coverage to Reissued Order	Current Legally Responsible Official Certifies in CIWQS
June 5, 2023	Reissued Order is In Effect 2006 and 2013 Orders are rescinded	
Due by June 5, 2023	✓ Item 2: Existing SSMP must be uploaded into CIWQS Item 3: Spill Emergency Response Plan must be updated for implementation Item 4: All Spill Reporting into CIWQS per Reissued Order, Attachment E1 Item 5: Legally Responsible Official per Reissued Order	

Short Term Compliance by June 5, 2023

Item #3: Spill Emergency Response Plan must be updated and implemented

(Not required to be submitted to State Water Board)

Spill Emergency Response Plan

Must be updated annually to address for prompt detection and response to spills

- Notification of primary responders, regulatory agencies and affected entities
- Coordination with storm drain agencies and other utility agencies
  - Spill containment to prevent/minimize discharge to waters of the State
  - Appropriate clean up per drainage agency standards (and per NPDES permit)

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Spill Emergency Response Plan

Must address:

- Notification to CalOES, as applicable
- Spill clean up and documentation
- Monitoring and reporting requirements per Spill Category (Attachment E1)
- Collection of spill information for prevention of future spills
- Post-spill assessment of spill response activities
- Other – See Section 6 of Attachment D

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Why Emergency Response Plan must be Updated Now

(although a part of the SSMP)

- A quick effective response:
  - Can prevent a violation of one or more prohibitions
  - Will reduce spill volume to surface waters
  - May prevent sampling requirements
- Local utility agency coordination is a must-have
  - Immediate access to drainage conveyance system
  - Advanced coordination provides immediate action to block and clean up spill
  - Knowing if drainage leads to groundwater infiltration or retention prevents erroneously Category 1 spill reporting
- Documentation provides defense from a 3rd party lawsuit
  - Sewage discharges to groundwater are not a federal violation
- Have an Environmental Laboratory Accreditation Program (ELAP) laboratory

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Short Term Compliance by June 5, 2023

Item #4: Legally Responsible Official Designation in CIWQS

Attachment A: Definitions

A Legally Responsible Official is an official representative, designated by the Enrollee, with authority to sign and certify submitted information and documents required by this General Order.

- Spill Reports -
- Annual Reports (showing system performance) -
- Audit Reports -
- Sewer System Management Plans -

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Section 5.1: Legally Responsible Official Designation

The Legally Responsible Official must:

- Have the authority to ensure Enrollee complies with the Order
- Serve as the duly authorized representative

The Legally Responsible Official must:

- Have responsibility over management of the Enrollee's entire sanitary sewer system
- Be authorized to make managerial decisions that govern the operation of the system
  - Including implicit or explicit duty of making major capital improvement recommendations to ensure long-term compliance
- Have direct authority over individuals that:
  - Possess a degree or certificate related to operations and maintenance of sanitary sewer systems, and/or
  - Have professional training and experience related to the management of sanitary sewer systems

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Why the Expansion of the Legally Responsible Official Qualifications

Expanded LRO Qualifications		Expanded Focus of Reissued Order (beyond spill reporting)
• Have responsibility over management of the Enrollee's entire sanitary sewer system	→	• Development and effective implementation of SSMP
• Be authorized to make managerial decisions that govern the operation of the system • Including making capital improvement recommendations for long-term compliance	→	• Long-term system resiliency • Adaptability of utility management to address changing impacts
• Have direct authority over degreed, certified, experienced, trained system personnel	→	• Emphasize on "system-specific"

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Why the Expansion of the Legally Responsible Official Qualifications

In Greater Detail

Expanded LRO Qualifications	Expanded Focus of Reissued Order (beyond spill reporting)
• Have responsibility over management of the Enrollee's entire sanitary sewer system	• Examination of annual performance and long term spill trends • Examination of system-specific climate change impacts to proactively address causes of future spills
• Be authorized to make managerial decisions that govern the operation of the system • Including making capital improvement recommendations for long-term compliance	• Address problem system areas identified by condition assessment data and previous spill information
• Have direct authority over degreed, certified, experienced, and trained system personnel	• Prioritization of capital improvement projects based on data from condition assessments, spills • Further source control for wipes, rags, debris and other causes of blockage

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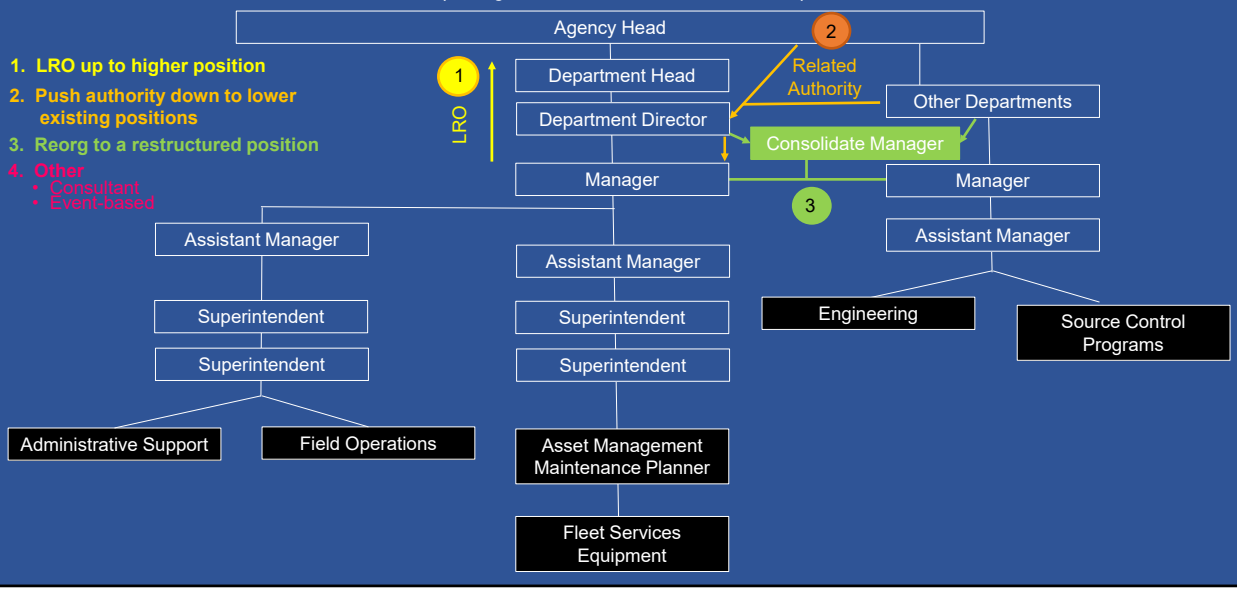
Examining Potential [Regulation-driven] Options for Legally Responsible Official Designation

Example Organizational Chart for Discussion Purposes



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Longer Term Compliance

(preparation needed for upcoming due dates)

CALIFORNIA WATER BOARDS State Water Resources Control Board

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Longer-Term Compliance

February 1, 2024 April 1, 2024	Annual Reporting of Cat 4 and Lateral Spills First Annual Report Submittal	Annual Report replaces Questionnaire
2024 or 2025	End of Audit Period Audit Reports due 6 months later	• Audit to identify gaps in SSMP • Audit Report to be Uploaded into CIWQS
2025 or 2026 July – Dec 2025	Sewer System Management Plan Update Service Area Boundary Map	• Updated Plan w/ additional system-specific elements required in Attachment E • Both to be uploaded into CIWQS

CALIFORNIA WATER BOARDS State Water Resources Control Board

Statewide Sanitary Sewer Systems General Order

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Plan **Audit** Due Dates for Existing Enrollees

Population that Served as Basis for Initial SSMP Due Date	Required Plan Audit Due Dates per Order 2006-0003-DWQ						End of current 3-year Audit period*
> 100,000	5/2/2011	5/2/2013	5/2/2015	5/2/2017	5/2/2019	5/2/2021	5/2/2024
100,000 to 10,000	8/2/2011	8/2/2013	8/2/2015	8/2/2017	8/2/2019	8/2/2021	8/2/2024
10,000 to 2,500	5/2/2012	5/2/2014	5/2/2016	5/2/2018	5/2/2020	5/2/2022	5/2/2025
< 2,500	8/2/2012	8/2/2014	8/2/2016	8/2/2018	8/2/2020	8/2/2022	8/2/2025

** The Audit Report is due within six months after the end of the required 3-year audit period.*

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Sewer System Management Plan Update Due Dates for Existing Enrollees

Population that Served as Basis for Initial SSMP Due Date	Original Required Plan Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Upcoming (6-year) Plan Update Due Date
> 100,000	5/2/2009	5/2/2014	5/2/2019	5/2/2025
100,000 to 10,000	8/2/2009	8/2/2014	8/2/2019	8/2/2025
10,000 to 2,500	5/2/2010	5/2/2015	5/2/2020	5/2/2026
< 2,500	8/2/2010	8/2/2015	8/2/2020	8/2/2026

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Sewer System Management Plan Crosswalk

Attachment D of General Order

Enrollee-specific Audit (2024 or 2025) to identify gaps for Plan Update (2025 or 2026)

Existing General Order	Reissued General Order
1.Goal	1. Sewer System Management Plan Goal and Introduction
2. Organization	2. Organization
3. Legal Authority	3. Legal Authority
4. Operations and Maintenance Program	4. Operation and Maintenance Program
5. Design and Performance Goals	5. Design and Performance Provisions
6. Overflow Emergency Response Plan	6. Spill Emergency Response Plan
7. Fats, Oils, and Grease (FOG) Control Program	7. Sewer Pipe Blockage Control Program
8. System Evaluation and Capacity Assurance Plan	8. System Evaluation, Capacity Assurance and Capital Improvements
9. Monitoring, Measurement, and Program Modifications	9. Monitoring, Measurement and Program Modifications
10. Sewer System Management Plan (SSMP) Program Audits	10. Internal Audits
11. Communication Program	11. Communication Program

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Electronic Service Area Boundary Map

To be submitted between July – Dec 2025

- Detailing the boundary of the Enrollee's service area
- Mapping specifications on State Water Board program webpage by June 5, 2023
- The Legally Responsible Official shall submit the geospatial data:
  - Starting July 1, 2025, and no later than December 31, 2025

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Training and Customer Assistance taking place statewide...

- Water Board staff will continue to assist in professional training of regulations:
  - California Water Environment Association
    - Develop and deliver cost-effective interactive online trainings
  - Order implementation workshops
- Looking to Consultants and Industry associations to
  - Develop guidance documents
  - Conduct Order implementation training events
  - Assist Enrollees to stay in ongoing compliance

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Thank you

For updates and guidance tools:
https://www.waterboards.ca.gov/water_issues/programs/sso/

For direct assistance, please email
SanitarySewer@waterboards.ca.gov

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Attachment 2 — SERP Key Performance Indicators (KPIs)

The KPIs developed in this attachment are designed for helping sewer managers charged with annually reviewing and assessing the SERP effectiveness and identifying any necessary updates to comply with ATT D-6 (Order No. 2022-0103-DWQ).

Compliance Point	WDR	No.	Key Performance Indicators (KPIs)	Target	Measured by
COMPLIANCE POINT 1 (Allocate necessary resources for spill responses)					
1	5.7	5.7.1	% of $ budgeted vs. $ spent (emergency response operations)	100%	Annual review
1	5.7	5.7.2	% of $ budgeted vs. $ spent (emergency response equipment)	100%	Annual review
COMPLIANCE POINT 2 (Update/Implement SERP)					
2-1	5.12	5.12.1	Was SERP approved by effective deadline (6/4/2023)?	Yes	N/A
2-1	5.12	5.12.2	Was annual review/assessment of SERP completed by required due date?	Yes	N/A
2-1	5.12	5.12.3	% review of all SERP activity/change log entries addressed	100%	Annual review
2-3	5.12	5.12.4	% recovery for all spills	>50%	Annual review
2-3	5.12	5.12.5	% of Category 1 spills prevented due to containment operations	>50%	Annual review
2-3	5.12	5.12.6	% of spills reaching drainage conveyance systems where sewage was fully recovered	>50%	Annual review
COMPLIANCE POINT 3 (Compliance with Notification, Monitoring, Reporting and Recordkeeping)					
3	5.13	5.13.1	% compliance with regulatory notification requirements	100%	Annual review
3	5.13	5.13.2	% of time response time goals were met	>90%	Annual review
3	5.13	5.13.3	Do all field records match data in CIWQS by LRO?	Yes	Annual review
3	ATT D-6	D-6.1	Are all outside agencies contacts up to date?	Yes	Annual review
3	ATT D-6	D-6.2	% of Category 1 spills requiring sampling completed within 18 hours	100%	Annual review
3	ATT D-6	D-6.3	% spill reporting requirement deadlines met	100%	Annual review

Compliance Point	WDR	No.	Key Performance Indicators (KPIs)	Target	Measured by
COMPLIANCE POINT 4 (Collaborate with Storm Drain Agencies and Ensure Easement Access)					
4	ATT D-3	4.1	% of easements inspected to ensure access	100%	Annual review
4	ATT D-3	4.2	% of time easement access inhibited spill response activities	0%	Annual review
4	ATT D-3	4.3	Were agreed-upon coordination practices adhered to?	Yes	Annual review
COMPLIANCE POINT 5 (SERP training and practice drills)					
5	ATT D-4	5.1	% of SERP training and assessments performed for all appropriate field staff	100%	Annual review
5	ATT D-4	5.2	% review /update of all required staff training records for completeness	100%	Annual review
COMPLIANCE POINT 6.1 (Ensure Training/Implementation of SERP for staff and contractors)					
6.1	ATT D-6	6.1.1	Were all appropriate contractors trained in accordance with SERP	100%	Annual review
COMPLIANCE POINT 6.2 (Address Emergency Operations/Traffic Control)					
6.2	ATT D-6	6.2.1	Were all emergency system operations/response activities performed in accordance with SERP	100%	Annual review
COMPLIANCE POINT 6.3 (Implement technologies, practices, equipment, inter agency coordination)					
6.3	ATT D-6	6.3.1	% of spills where technologies and inter agency coordination implemented and effective	100%	Annual review
6.3	ATT D-6	6.3.2	Were all established mutual aid agreements reviewed for effectiveness?	Yes	Annual review
COMPLIANCE POINT 6.4 (Conduct Post-spill assessments)					
6.4	ATT D-6	6.4.1	% compliance with completing required post-spill assessments to comply with regulatory requirements	100%	Annual review

Attachment 3 — Spill Category Determination Worksheet

Spill Category Determination Worksheet

Step 1

Determine Responsibility:

- ☐ **Private** (Source of Problem is within privately-owned system)
- ☐ **Other Public Agency** (Source of Problem is within publicly owned system NOT operated by Your Agency)
- ☐ **Your Agency** (Source of Problem is within YOUR agency's system.) If YES, answer the questions below in order, beginning with Category 1

Step 2

Answer the questions below, in order, beginning with Category 1. When you determine the correct category, check the box to the left)

☐ **Is a CATEGORY 1 (if answer to ANY question is Yes)**	
Discharge to Surface Water?	☐ Yes ☐ No
Discharge to Drainage Conveyance System that Discharges to Surface Water, but NOT Fully Captured?	☐ Yes ☐ No
Exfiltrated to Hydraulically Connected Surface Water?	☐ Yes ☐ No

☐ **Is CATEGORY 2 (if spill is NOT a Category 1, and answer to question is Yes)**	
Is Discharge Volume 1,000 Gallons or Greater?	☐ Yes ☐ No

☐ **Is CATEGORY 3 (if spill is NOT a Category 1, and answer to question is Yes)**	
Is Discharge Volume 1,000 Gallons or Greater?	☐ Yes ☐ No

☐ **Is a CATEGORY 4 (if spill is NOT a Category 1 and answer to question is Yes)**	
Is Discharge Volume is Less than 50 Gallons	☐ Yes ☐ No

Attachment 4 — Spill Time Estimation Worksheet

Spill Start Time Estimation Worksheet

Milestones				
Agency Notified	Date:		Time:	☐ AM ☐ PM
Spill First Observed by Caller	Date:		Time:	☐ AM ☐ PM
Caller Observed Not Spilling	Date:		Time:	☐ AM ☐ PM
Spill First Observed by Agency	Date:		Time:	☐ AM ☐ PM
Spill End Time	Date:		Time:	☐ AM ☐ PM

Caller/Witness Description of the Spill

First Responder Description of the Spill

Site Conditions			
Evidence of Solids ☐ YES ☐ NO	Distance Solids Traveled from Spilling Structure:		Feet
Other Observations:			
	Spill Rate:		GPM

Calculation Sheet
(Can be used if volume can be determined without duration i.e., measured volume method)

Spill Volume: _____ Gals

Duration: _____ Minutes ÷ Spill Rate: _____ GPM = _____ Minutes

Spill End Time: ☐ AM ☐ PM - Duration: Minutes = **Spill Start Time**

Spill Start Time Estimation Worksheet

Describe how information was used to establish the basis for spill start time estimate

Responsible Person			
Estimation Determined By:		Date:	
Spill Event ID (From CIWQS)		Spill Name:	
Start Time:	☐ AM ☐ PM	**Date:**	

Start Time:
The start time is sometimes difficult to establish. Many times, a combination of methods will need to be employed. Here are some approaches:

Nearby Witnesses:
Residents and/or witnesses' interviews can be used to establish the start time. Inquire as to their observations. Spills that occur in public rights-of-way (streets, shopping centers, etc.) are usually observed and reported promptly. Spills that occur out of the public view (fields, access roads, etc.) can go on longer.

Observed Flow Rate + Volume:
If the flow rate and volume spilled can be reasonably determined, this information can be used to work backwards to better determine the spill start time.

Example:

Time the spill was discovered	9:00 am	
Crews determined the spill rate	10 GPM	540 ÷ 10 = **54 minutes total duration of spill time**
Completely contain and measure the spill volume,	540 gallons	
Spill end time	9:26 am	9:26 am – 54 minutes =
Spill start time	8:32 am	

This assumes that the flow rate was the same throughout the entire spill. You can consider the diurnal flow patterns, if available, and fine-tune the start time.

Spill Start Time Estimation Worksheet

Telemetry Data:

Lift stations and flow recorders utilize SCADA and Manholes and vaults can be monitored using Level Sensors. The data collected by these devices will indicate when flows have changed due to a blockage. A blockage upstream or downstream of a flow recorder will cause measured flows to increase or decrease. A blockage upstream of a lift station will reduce the flows into the station and cause the pumps to run less frequently. Comparing typical daily flows to the change in flows due to a blockage can help to determine spill start time.

Site Conditions:

Conditions at the spill site change over time. Initially there will be limited deposits of toilet paper and other sewage solids. After a few days to a week, the sewage solids form a light-colored residue. After a few weeks to a month, the sewage solids turn dark. The quantity of toilet paper and other materials of sewage origin increase over time. The sewer solids/tissue paper will dry over time. These observations can be used to help estimate the start time and to support assumptions. Taking photographs to document the observations can be helpful if questions arise later in the process. In addition, A low spill rate and a large amount of sewage spilled might indicate a longer duration.

Accounting for Flow Variation:

It is important to remember that spills may not be continuous. Blockages are not usually complete (some flow continues). Refer to agency diurnal flow patterns for typical flow variations. Response personnel should open the first manhole downstream from the blockage and, if flow is observed, measure, document and take pictures.

Spills that occur due to peak flows in excess of capacity will occur only during, and for a short period after, heavy rainfall. Use available rainfall data as appropriate.

Interviews:

Interview the caller and ask, "when did you first observe the spill." Also ask "can you recall the last time you observed it was not spilling." This will help you to establish a Start Time window. "…I first noticed the spill at 8:20 am. Last night when I came home from dinner at 7:30 pm last night it was not spilling." This information in conjunction with spill volume, spill rate, site data, personal experience, etc. can help to make the best estimation under the circumstance.

Is it Reasonable:

When you believe you have done all you can and you have reached a conclusion, ask yourself "… is it reasonable to believe this spill began at (time) based on all the other evidence.

End Time:

The end time is usually much easier to establish. Once the sewage is contained in the system (e.g., in the manhole, wet well, clean out, etc. the spill has ended.

Attachment 5 — Spill Duration and Flow Worksheet

Duration and Flow Rate Worksheet

Table A		
Spill Start Time (See Spill Start Time Estimation Worksheet)	1	☐ AM ☐ PM
Spill End Time (See Spill Response Field Report, Page 4)	2	☐ AM ☐ PM
Duration (Subtract 1 from 2)	3	Minutes
Spill Rate	4	GPM
Total Volume (Multiply #3 x #4)	**5**	**Gallons**

Required Photo & Video	
☐ Photo of Spilling Structure Attached	☐ 10-Second Video of Spilling Structure on File

Method to Determine Spill Rate	
☐ Flow Monitoring	☐ Single Family Home Flow Chart
☐ Spill Rate Calculator	☐ Photo Comparison
☐ Eyeball Method (Only for Low Spill Rates ≤ 10 Gallons)	
☐ Other:	
Notes:	
☐ Attach Calculation Worksheets	

Responsible Person					
Estimation Determined By:				Date:	
Spill Event ID (From CIWQS)		Spill Name:			
Start Time:		☐ AM ☐ PM		**Date:**	

Attachment 6 — Spill Measured Volume Estimation Worksheet

Measured Volume Spill Estimation Worksheet

Spill Event ID (from CIWQS) _____, Spill Name: _____

* Depths: Asphalt = 0.0013′ Concrete = 0.26′ Ponding = Average Measured Depth

Table A

Area ID	Surface	Length	x	Width	x	% Wet	Depth*	=	Volume (c.f.)
			x		x			=	
			x		x			=	
			x		x			=	
			x		x			=	
			x		x			=	

☒ Attach Photo(s) of Wetted Perimeter Total Volume:

Table B

Total Volume:		**x**	**7.48 (Gallons/Cubic Foot)**	**=**		**Gallons**
Completed By: _____ Date: _____/_____/_____						

Measured Volume Spill Estimation Worksheet

This method can be used when:

- The limits of the wetted area can be determined.
- The surfaces are dry prior to the spill.
- Sewage has left a wet stain on hard surfaces.
- Sewage has ponded and the depth can be measured.
- Sewage is contained in a structure like a storm drain or vault.

The Procedure on hard surfaces:

Step 1. **Sketch the perimeter of the spill/wetted area.**

Step 2. **Identify the surface type.**

i. Determine the depth of the wet area.

Step 3. **Break down the wetted area into shapes using rectangles and/or squares.**

i. Use cones to mark the corners of the shape.

a. This improves measurements.

b. Helps ensure all portions of the wetted area are measured.

c. Helps ensure the same area is not measured twice.

Step 4. **Label Each Shape (This is the Area ID)**

i. Use Letters so they are not confused with the measured dimensions.

Step 5. **Measure each shape.**

Step 6. **Estimate the percentage of the shape that is wet.**

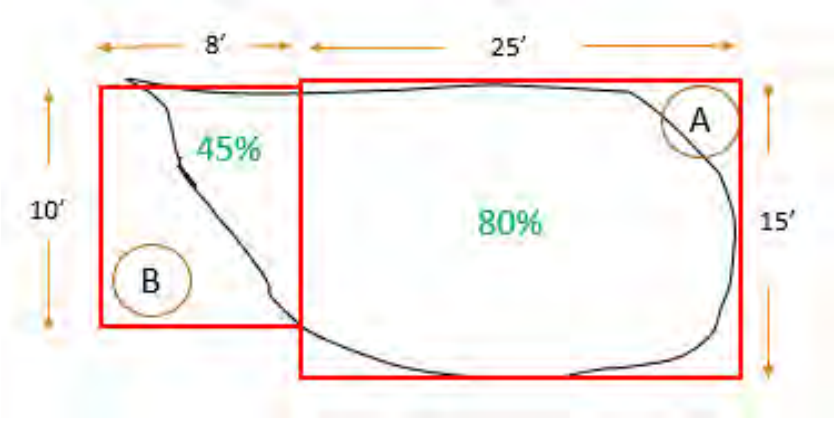
Step 7. **Complete Table A**

i. Transfer Total Volume to Table B

Step 8. **Complete Table B**

Step 9. **Sign and date to indicate who completed the form.**

Example



Attachment 7 — Spill Upstream Connections Volume Estimation Worksheet

Upstream Connections Spill Volume Estimation Method

NOTES:

- A Single-Family Residential Unit is One Equivalent Dwelling Unit (EDU)
- This Method Can Be used for a Single Home/Building or Multiple Homes/Buildings

Procedure:

Step 1: Determine the Location of the Blockage

i. This May Require CCTV Inspection

Step 2: Determine the Use Type for Each Connection

i. Single Family Residential (1 EDU)
ii. Multi-Family Residential (1 EDU for each Residence)
iii. Commercial/Industrial (# of EDU's Per Agency Records)

Step 3: Count the Number of Connections Upstream from the Blockage

i. If a Building is Known to Be Vacant, Do Not Include It

Step 4: Determine the Number of EDUs for each Use Type (Enter into Table A)

Step 5: Determine Duration of the Spill (Difference Between Start Time and End Time)

i. In Table B, Column E, Enter the Time the Spill Was Active for that Time Period
ii. Multiply Column D x Column E and Enter into In Table B, Column F,
iii. Total Column F for all Time Periods

Table A	
Use Type	**EDU**
Single Family Residential	
Multi-Family Residential	
Commercial/Industrial	
Total EDU's	

Table B	Estimated Flow Rate Per EDU (190 gpd)				Spill	
	A	B	C	D	E	F
Time Period	Gallons Per Period	Hours Per Period	A÷B = Gals. Per Hour	C÷60 = Gals. Per Min.	Minutes Spill Was Active	D x E= Gallons Spilled Per Period
6am -Noon	75	6	12.5	.21		
Noon – 6pm	55	6	9.16	.15		
6pm - Midnight	50	6	8.33	.14		
Midnight -6am	10	6	1.67	.03		
Total Estimated Spill Volume per EDU:					(G)	

Table C	Calculation						
Spill Volume/EDU:	Gallons	x	Number of EDU's		=	Estimated Spill Volume	Gallons
(From Cell G)			(From Table A)				

Attachment 8 — Spill Response Evaluation Worksheet

Sewer Spill Response Evaluation Worksheet

Spill Event ID: _____ Spill Event Name: _____

Answer the questions below, in order, beginning with Category 1. When you determine the correct category, check the box to the left)

1. Notification and Communication Procedures

a. Were notification procedures adhered to? ☐ Yes ☐ No

b. Were notification procedures effective? ☐ Yes ☐ No

2. Response Procedures

a. Were response time goals met? ☐ Yes ☐ No

b. Were safety procedures adhered to? ☐ Yes ☐ No

c. Were safety procedures effective? ☐ Yes ☐ No

Sewer Spill Response Evaluation Worksheet

2. Response Procedures

d. Were initial response procedures adhered to? ☐ Yes ☐ No

e. Were initial response procedures effective? ☐ Yes ☐ No

f. Were containment procedures adhered to? ☐ Yes ☐ No

g. Were containment procedures effective? ☐ Yes ☐ No

h. Were clean up and recovery procedures adhered to? ☐ Yes ☐ No

i. Were Sewer Back up procedures adhered to? ☐ Yes ☐ No

Sewer Spill Response Evaluation Worksheet

2. Response Procedures

j. Were Sewer Back up procedures effective? ☐ Yes ☐ No

k. Were Chain of Custody procedures adhered to? ☐ Yes ☐ No

l. Was Failure Analysis investigation performed and documented? ☐ Yes ☐ No

3. Reporting and Notification Procedures

a. Were reporting and notification timeline requirements met? ☐ Yes ☐ No

4. Documentation

a. Was Spill file created? ☐ Yes ☐ No

Sewer Spill Response Evaluation Worksheet

4. Documentation

b. Was QA/QC performed to ensure field data matched CIWQS data? ☐ Yes ☐ No

5. Failure Analysis

c. Was Failure Analysis Performed? ☐ Yes ☐ No

d. Were Any Work Programs Changed as a Result? ☐ Yes ☐ No

Sewer Spill Response Evaluation Worksheet

Recommended Changes: ☐ N/A

Attendees:

Facilitated by:

	Date / /

Attachment 9 — Training Record Worksheet

Training Record

Notification and Communication Procedures

Trainer: _____ Trainer Position/Company: _____

Training Location/Environment: _____

Basis for Training & Materials Used:

1.	2.
3.	4.
5.	6.
Comments	
(Basis Examples: SOP, Power Point, Manufacturer's Recommendations, on-the-job-training. Reference Title when applicable)	

Training Description	Attachments: ☐

(Describe in detail what training entailed)

Attachments ☐

Training Method: (Check all that apply)

☐ Classroom/Instructor ☐ Breakout Sessions ☐ Tabletop Exercise ☐ Drill ☐ Hands-on

☐ Coaching/Mentoring ☐ Role Playing ☐ Computerized/on-line Training

☐ Other: _____

Attachments ☐

Training Record

Method to Qualify Trainees: (Check all that apply)

☐ Exam/Quiz ☐ Assessment of Ability ☐ Attendance/Participation

☐ Other: _____

(Maintain Qualifying Records with Training Records)

Trainer Signature: _____ Date: _____/_____/_____

Length of Training (Time) _____ hours

Signature Sheet

Trainee Name (Print)	Signature	Qualified	Qualified By (initials)
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

Training Record

Trainee Name (Print)	Signature	Qualified	Qualified By (initials)
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	
		☐ Yes ☐ No	

Attachment 10 —Cleaning Services Declination Waiver

Cleaning Services Declination Waiver

Customer Name:			
Customer Address:			
Customer Phone:	(H)	(W)	(C)

On (date) _____ at (*time*): _____ approximately _____gallons of (*check one*):

☐ Sewage ☐ Grey Water ☐ Toilet Bowl Water ☐ odor ☐other

Overflowed from or odor emanating from:

☐ Toilet ☐ Shower/Tub ☐ Toilet Bowl Water ☐ Washer ☐other

(*specify*): _____

The overflow affected the following area:

☐ Bathroom ☐ Hallway ☐ Kitchen ☐ Wood Flooring ☐Crawlspace

☐ Other (*specify*): _____

The overflow affected the following materials:

☐ Tile ☐ Linoleum ☐ Carpet ☐ Wood Flooring ☐ Area Rugs

☐ Towels ☐ Clothing

☐ Other (*specify*): _____

Photos were/were not taken (*circle one*): _____ # of photos taken.

The suspected cause of the overflow/odor:

This Form Completed By: _____ Date & Time: _____

Cleaning Services Declination Waiver

CUSTOMER – PLEASE READ AND SIGN BELOW:

I/We acknowledge that _____(AGENCY) has offered to provide professional cleaning and decontamination services to remediate the sewage backup and/or overflow described above and that I/We declined the offer.

I/We further understand and acknowledge that because I/We have declined the AGENCY's offer of assistance, the AGENCY will not be responsible for any necessary remediation activities and will not be responsible for any expenses incurred as a result of this incident.

I/We understand that by signing this form, I/We hereby waive any and all claims I may have against the AGENCY as a result of the sewage backup and/or overflow described above.

The information above was explained to the customer by (*please print*):

Employee Signature: _____ Title: _____

Customer Signature: _____ Date: _____

Customer Signature: _____ Date: _____

Attachment 11 —Equipment Inventory and Critical Spare Parts List

Equipment Inventory – Critical Spare Parts List

Critical?	Item ID (If Applicable)	Item Description	Manufacturer	Qty	[1] Lift Station Compatibility (List Stations Item Can Be Used)	Storage Location

Attachment 12 —Spill Data and Trends Worksheet

Spill Data and Trends Worksheet

Asset ID	Spill Date	Spill Category	Age	Pipe Material	Pipe Dia.	Spill Cause	Cause Location	Previous Spills Same Location	Notification Category	Response Time (Minutes)	Response Time Goal (Minutes	Response Goal Outcome	Volume Spilled	Volume Recovered	% of Spill Recovered	2-Hour Notification Met?

Attachment 13— SPILL RESPONSE FIELD FORM

SPILL RESPONSE FIELD REPORT

NOTIFICATION METHOD

☐ Public Discovery ☐ Employee Discovery ☐ Lift Station Alarm ☐ Contractor Discovery

☐ Other (please list) _____

Time call received_____ ☐ AM ☐ PM Date _____

Address of call: _____ Received by _____

Caller's name_____ Caller's phone _____

Date and time caller noticed the spill ☐ AM ☐ PM

Did you follow the agency's interview script? ☐ Yes ☐ No

Caller's comments:

_____

_____

_____

RESPOND AND ASSESS

First Responder's Name _____

Actively spilling? ☐ Yes ☐ No (if yes, remind customer to stop all water use)

Arrival Time: _____ ☐ AM ☐ PM Photos and Video Taken of Spill Area ☐ Yes ☐ No

Additional Resources Needed ☐ Yes ☐ No (If Yes, Check All That Apply)

☐ Supervisor ☐ Hydro-Vac ☐ Assistance/Personnel (x _____) ☐ Containment Items

☐ Traffic Control ☐ Electrical/Controls Tech ☐ Mechanical Maintenance/Pump Tech

List resources, personnel and time requested below:

_____

_____

_____

_____

SPILL RESPONSE FIELD REPORT

SPILL CATEGORY

- ☐ **Category 1** – Any volume that discharges to surface water, or a dry surface water body with no flow, or storm drain system and is not fully captured.
- ☐ **Category 2** – A spill of 1,000 gallons or greater that does not discharge to a surface water.
- ☐ **Category 3 –** A spill of 50 gallons and less than 1,000 gallons that does not discharge to a Surface water.
- ☐ **Category 4 –** A spill of less than 50 gallons that does not discharge to a surface water
- ☐ **Private** – A privately owned sewer system or lateral

If the spill is a category 1 or 2, immediately start your agency notification process. Category 1 and 2 have a 2 hour reporting window after knowledge of the spill.

CONTAINMENT

☐ Curb & Gutter ☐ Street ☐ Open Space ☐ Storm Drain System ☐ Drainage Channel

☐ Inside Building ☐ Lawn/Landscaped Area ☐ Creek/Stream ☐ Wetland

☐ Other: _____

CONTAINMENT METHOD (Check All That Apply):

☐ Inlet Mats ☐ Sandbags ☐ Dirt Dam/Berm ☐ Rubber Berm ☐ Vacuum Retrieval

☐ Spill Kit ☐ Naturally Contained ☐ Hand Dig Trench ☐ Dry Sweep ☐ Pneumatic Plugs

☐ Divert Sewer System ☐ Absorbent Waddles

☐ Other: _____

CONTAINMENT NOTES

_____

_____

_____

_____

_____

SPILL RESPONSE FIELD REPORT

FAILURE LOCATION

☐ Lower Lateral ☐ Upper Lateral-Private ☐ Gravity Main ☐ Force Main

☐ Lift Station List Asset ID#'s_____

CORRECT CAUSE AND RESTORE FLOW (SELECT ALL THAT APPLY)

☐ Gravity Line Blockage - ☐ Hydro-Vac ☐ Power Rodder ☐ Hand Rods ☐ Excavation ☐ By-Pass

☐ Lift Station - ☐ Electrical ☐ Mechanical ☐ Pull Pump-DeRag ☐ By-Pass ☐ Generator

☐ Force Main - ☐ Hydro-Vac. ☐ By-Pass ☐ Excavation

☐ Lateral - ☐ Cable Machine (EEL) ☐ Hand Rods ☐ Excavation

Description of Actions taken to correct the cause and restore flow:

_____

_____

_____

_____

SPILL CAUSE (select all that apply)

☐ Debris Rags ☐ Root Intrusion ☐ FOG ☐ non-Dispersables

☐ Lift Station – Electrical ☐ Lift Station Failure-Mechanical ☐ Vandalism

☐ Debris Construction ☐ Pipe / Structural Failure ☐ Natural Disaster

☐ Pipe/ Structural Failure ☐ Capacity Exceeded- I&I ☐ Agency Caused

☐ Other: _____

SPILL RESPONSE ACTIVITIES (SELECT ALL THAT APPLY)

☐ Mitigated Effects of the Spill ☐ Contained all or Portion of Spill ☐ Restored Flow

☐ CCTV Inspection for Cause ☐ Clean Sewage from Drainage Conveyance

☐ Cleaned Spill Area ☐ Captured and Removed All Washdown Water

☐ Photographs and GPS Locations

SPILL RESPONSE FIELD REPORT

Description Of Spill Response Actions

_____

_____

_____

_____

SPILL LOCATION AND SPREAD

Spill Appearance Point:

☐ Building or Structure ☐ Force Main ☐ Gravity Main ☐ Manhole ☐ Agency Cleanout

☐ Private Cleanout ☐ Grease Interceptor ☐ Other: _____

Number of Spill Appearance Points: _____ If multiple points are in a single event, photograph the point closest to the spill origin.

FINAL SPILL DESTINATION (Select All that Apply):

☐ Building ☐ Storm Drain ☐ Drainage System ☐ Paved Surface ☐ Unpaved Surface

☐ Landscaped Area ☐ Street Curb/Gutter ☐ Surface Water

☐ Other: _____

Destination 1: Longitude: _____ Latitude: _____

Destination 2: Longitude: _____ Latitude: _____

Estimated Spill Rate: _____ GPM Method to Determine Spill Rate: _____

ESTIMATED TRAVEL TIME: ☐ N/A

From Point of Entry to Drainage System to Point of Discharge to Receiving Waters: _____ Minutes

- Distance from Spill Point to Storm Drain Conveyance System: _____ Ft ☐ N/A

From Spill Point to Receiving Waters: _____ Minutes

- Distance from Spill Point to Receiving Waters: _____ Ft ☐ N/A

Travel Time Estimation Method: _____

SPILL RESPONSE FIELD REPORT

REQUIRED PHOTOS:

☐ Spill Appearance Point(s) ☐ Affected Area(s) ☐ Point(s) of Entry Surface Water 

☐ Point(s) of Entry to Drainage Conveyance System

If Entered surface water:

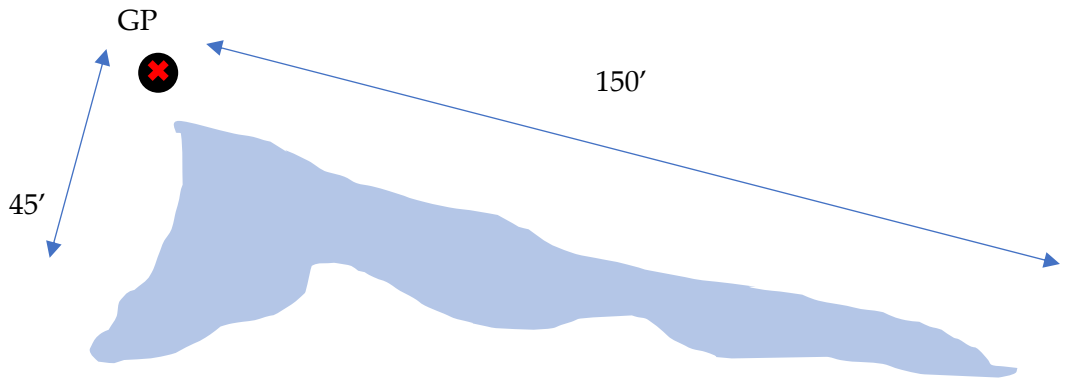
☐ Water Body Bank Erosion ☐ Water Sheen ☐ Floating Matter ☐ Discoloration

SPILL LOCATION AND SPREAD

Sketch the footprint of the spill and provide dimensions (in feet) for size and extent of spill.
Include the Appearance Point, the destination(s) and containment. Indicate where GPS coordinates were taken.

SPILL RESPONSE FIELD REPORT

EXAMPLE



SPILL VOLUME ESTIMATIONS

Volume Estimation Method:

☐ Measured Volume ☐ Flow Rate and Duration ☐ MH Flow Chart

☐ Counting Connections ☐ SCADA/ Telemetry Records

Estimated Spill Volume: _____Gallons Estimated Volume Recovered _____Gallons.

Spill Volume Estimation Notes: (List all measurements for spill spread)

SPILL RESPONSE FIELD REPORT

Estimate volume that reached a drainage conveyance system flowing to surface water _____Gals.

Estimate volume recovered from drainage conveyance system flowing to surface water _____Gals.

Estimate spill volume discharged directly to surface water (Category 1) _____Gals.

Estimate spill volume recovered from surface water (Category 1) _____Gals.

Estimate spill volume discharged to land _____Gals.

Estimate spill volume recovered from discharge to land _____Gals.

Spill Rate (GPM) _____ Total Spill Volume _____Gals. Total Volume Recovered _____ Gals.

Contact OES and obtain a Control Number **1-800-852-7550**

Time Called _____ ☐ **AM** ☐ **PM** **Control Number** _____

Notes:

Attachment 2

Certification of Existing Regulatory Coverage from the State Water Resource Control Board

State Water Resources Control Board

Date: May 17, 2023

Jose Zepeda
Irvine Ranch Water District
PO Box 57000
Irvine, CA 92619

NOTICE OF APPLICABILITY; CONTINUATION OF REGULATORY COVERAGE; STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER, 2022-0103-DWQ

Dear Jose Zepeda

Thank you for certifying your Continuation of Existing Regulatory Coverage form in the California Integrated Water Quality System (CIWQS) database. This Notice of Applicability serves as confirmation of the continuation of regulatory coverage from Order 2006-0003-DWQ to Order 2022-0103-DWQ for:

- Agency name: Irvine Ranch Water District
- Sanitary Sewer System name: Michelson WRP CS
- Waste Discharge Identification Number (WDID): 8SSO10587
- Certification date: May 17, 2023

As of the June 5, 2023 effective date, General Order 2022-0103-DWQ serves as the new statewide waste discharge requirements regulating sanitary sewer systems. The General Order, including all Attachments, is enforceable by the State Water Resources Control Board and the applicable Regional Water Quality Control Board. As of June 5, 2023, Order 2006-0003-DWQ is rescinded (except for enforcement purposes) and previously-held regulatory coverage under Order 2006-0003-DWQ is terminated.

If you have any questions regarding the statewide Sanitary Sewer Systems General Order or this Notice of Applicability, please email your questions to SanitarySewer@waterboards.ca.gov.

Sincerely,

Karen Mogus, Deputy Director
Division of Water Quality

State Water Resources Control Board

Date: May 17, 2023

Jose Zepeda
Irvine Ranch Water District
PO Box 57000
Irvine, CA 92619

NOTICE OF APPLICABILITY; CONTINUATION OF REGULATORY COVERAGE; STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER, 2022-0103-DWQ

Dear Jose Zepeda

Thank you for certifying your Continuation of Existing Regulatory Coverage form in the California Integrated Water Quality System (CIWQS) database. This Notice of Applicability serves as confirmation of the continuation of regulatory coverage from Order 2006-0003-DWQ to Order 2022-0103-DWQ for:

- Agency name: Irvine Ranch Water District
- Sanitary Sewer System name: Los Alisos WRP CS
- Waste Discharge Identification Number (WDID): 9SSO10669
- Certification date: May 17, 2023

As of the June 5, 2023 effective date, General Order 2022-0103-DWQ serves as the new statewide waste discharge requirements regulating sanitary sewer systems. The General Order, including all Attachments, is enforceable by the State Water Resources Control Board and the applicable Regional Water Quality Control Board. As of June 5, 2023, Order 2006-0003-DWQ is rescinded (except for enforcement purposes) and previously-held regulatory coverage under Order 2006-0003-DWQ is terminated.

If you have any questions regarding the statewide Sanitary Sewer Systems General Order or this Notice of Applicability, please email your questions to SanitarySewer@waterboards.ca.gov.

Sincerely,

Karen Mogus, Deputy Director
Division of Water Quality

State Water Resources Control Board

Date: May 17, 2023

Jose Zepeda
Irvine Ranch Water District
PO Box 57000
Irvine, CA 92619

NOTICE OF APPLICABILITY; CONTINUATION OF REGULATORY COVERAGE; STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER, 2022-0103-DWQ

Dear Jose Zepeda

Thank you for certifying your Continuation of Existing Regulatory Coverage form in the California Integrated Water Quality System (CIWQS) database. This Notice of Applicability serves as confirmation of the continuation of regulatory coverage from Order 2006-0003-DWQ to Order 2022-0103-DWQ for:

- Agency name: Irvine Ranch Water District
- Sanitary Sewer System name: IRWD - El Toro CS
- Waste Discharge Identification Number (WDID): 9SSO11514
- Certification date: May 17, 2023

As of the June 5, 2023 effective date, General Order 2022-0103-DWQ serves as the new statewide waste discharge requirements regulating sanitary sewer systems. The General Order, including all Attachments, is enforceable by the State Water Resources Control Board and the applicable Regional Water Quality Control Board. As of June 5, 2023, Order 2006-0003-DWQ is rescinded (except for enforcement purposes) and previously-held regulatory coverage under Order 2006-0003-DWQ is terminated.

If you have any questions regarding the statewide Sanitary Sewer Systems General Order or this Notice of Applicability, please email your questions to SanitarySewer@waterboards.ca.gov.

Sincerely,

Karen Mogus, Deputy Director
Division of Water Quality

State Water Resources Control Board

Date: May 17, 2023

Jose Zepeda
Irvine Ranch Water District
PO Box 57000
Irvine, CA 92619

NOTICE OF APPLICABILITY; CONTINUATION OF REGULATORY COVERAGE; STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER, 2022-0103-DWQ

Dear Jose Zepeda

Thank you for certifying your Continuation of Existing Regulatory Coverage form in the California Integrated Water Quality System (CIWQS) database. This Notice of Applicability serves as confirmation of the continuation of regulatory coverage from Order 2006-0003-DWQ to Order 2022-0103-DWQ for:

- Agency name: Irvine Ranch Water District
- Sanitary Sewer System name: IRWD - OCSD Regional 1 CS
- Waste Discharge Identification Number (WDID): 8SSO11513
- Certification date: May 17, 2023

As of the June 5, 2023 effective date, General Order 2022-0103-DWQ serves as the new statewide waste discharge requirements regulating sanitary sewer systems. The General Order, including all Attachments, is enforceable by the State Water Resources Control Board and the applicable Regional Water Quality Control Board. As of June 5, 2023, Order 2006-0003-DWQ is rescinded (except for enforcement purposes) and previously-held regulatory coverage under Order 2006-0003-DWQ is terminated.

If you have any questions regarding the statewide Sanitary Sewer Systems General Order or this Notice of Applicability, please email your questions to SanitarySewer@waterboards.ca.gov.

Sincerely,

Karen Mogus, Deputy Director
Division of Water Quality

State Water Resources Control Board

Date: May 17, 2023

Jose Zepeda
Irvine Ranch Water District
PO Box 57000
Irvine, CA 92619

NOTICE OF APPLICABILITY; CONTINUATION OF REGULATORY COVERAGE; STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER, 2022-0103-DWQ

Dear Jose Zepeda

Thank you for certifying your Continuation of Existing Regulatory Coverage form in the California Integrated Water Quality System (CIWQS) database. This Notice of Applicability serves as confirmation of the continuation of regulatory coverage from Order 2006-0003-DWQ to Order 2022-0103-DWQ for:

- Agency name: Irvine Ranch Water District
- Sanitary Sewer System name: IRWD - OCSD Regional 2 CS
- Waste Discharge Identification Number (WDID): 8SSO11518
- Certification date: May 17, 2023

As of the June 5, 2023 effective date, General Order 2022-0103-DWQ serves as the new statewide waste discharge requirements regulating sanitary sewer systems. The General Order, including all Attachments, is enforceable by the State Water Resources Control Board and the applicable Regional Water Quality Control Board. As of June 5, 2023, Order 2006-0003-DWQ is rescinded (except for enforcement purposes) and previously-held regulatory coverage under Order 2006-0003-DWQ is terminated.

If you have any questions regarding the statewide Sanitary Sewer Systems General Order or this Notice of Applicability, please email your questions to SanitarySewer@waterboards.ca.gov.

Sincerely,

Karen Mogus, Deputy Director
Division of Water Quality

Certification Statement

Per Section 5.9 - Reporting Certification: General Order 2022-0103-DWQ:

Reporting Certification The Legally Responsible Official shall electronically certify, on the Enrollee's behalf, all applications, reports, the Sewer System Management Plan(s) and corresponding updates, and other information submitted electronically into the online CIWQS Sanitary Sewer System Database, as follows:

Document Certifying: 2025 Sewer System Management Plan - Update

Date of Certification: 5/2/2025

Certifying Official: William Kleinau, Collection Systems Manager (Secondary LRO)

"I  **certify under penalty of perjury under the laws of the State of California that the electronically submitted information was prepared under my direction or supervision. Based on my inquiry of the person(s) directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete, and complies with the Statewide Sanitary Sewer Systems General Order. I am aware that there are significant penalties for submitting false information."**