

## **SECTION 7. OVERFLOW EMERGENCY RESPONSE PLAN**

This SSMP section describes the City's overflow emergency response plan (OERP) for its wastewater collection system as required by the WDRs. The major items discussed in this section are as follows:

- Regulatory Requirements
- Overview
- Chain of Communication
- Response
- Regulatory Reporting
- Training/Awareness
- Traffic and Crowd Control
- Impact Mitigation

### **REGULATORY REQUIREMENTS**

WDR Section D-13-vi requires the following:

The City shall develop and implement an OERP that identifies measures to protect public health and the environment. At a minimum, this plan must include the components listed in Table 7-1. Also listed in the table are the headings in the body of this section under which the required components are discussed.

**Table 7-1. Overflow Emergency Response Plan Requirements**

WDR Paragraph Number	Heading Under Which Addressed	Required Component
D-13-vi(a)	Chain of Communication	Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner
D-13-vi(b)	Response Program	A program to ensure an appropriate response to all overflows
D-13-vi(c)	Regulatory Reporting	Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification.
D-13-vi(d)	Training/Awareness	Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained
D-13-vi(e)	Traffic and Crowd Control	Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities
D-13-vi(f)	Impact Mitigation	A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge

## OVERVIEW

The Maintenance Division of the Public Works Department (Maintenance Division) and the Utilities Department are both responsible for operating and maintaining the wastewater collection system. The Maintenance Division is responsible for all sewer pipelines, both gravity sewers and force mains, while the Utilities Department is responsible for the sewer lift stations, including valves on the force mains. Each of the groups has their own procedures for emergency operations. However, the Maintenance Division is primarily responsible for maintaining and executing the City's OERP, which include primary responsibility for containing, cleaning, and reporting actual SSOs. The primary OERP is contained in a document entitled the *Field Response Guide for Sanitary Sewer Overflows/Backups and Chemical Spill* (Field Guide) and in a packet entitled *In the Event of a Sanitary Sewer Overflow, Read Me First* (Field Packet) carried in all of the field utilities vehicles, and included under separate cover with the SSMP. The Utilities Department Maintains related documents, which are the lift station system manuals (one for each lift station) and a document entitled *Master Spill Response and Notification Quick Guide*. All of these documents are also included under separate cover with the SSMP.

## CHAIN OF COMMUNICATION

The City has a chain of communication for SSO events, as required by WDR D-13-vi(a) (see above). The lines of communication range from complaints or other reports of potential SSOs to internal communication during an SSO event to notifying and reporting to regulatory agencies.

The City receives notification of potential SSOs from various sources including citizens, lift station alarms, and collection system field crews. Citizens with complaints can call telephone numbers for the Maintenance Division (the primary responders to potential SSOs) listed in phone directories and on the City's internet site. Phone numbers are available for both business and after hours. The other two City agents who often receive citizen reports of potential SSOs are the Emergency Dispatcher and the Utilities Department, who in turn contact the Maintenance Division. Potential SSOs are also identified by the Utilities Department's lift station alarms and field crew observations. Every lift station has either SCADA alarms or autodialer alarms that automatically alert Utilities Department staff of a potential problem. Department crews routinely operate, inspect, and maintain the City's lift stations, and may identify potential SSOs. The Utilities Department's communication procedures for contacting the Maintenance Division during potential SSOs are documented in a manual entitled the *Master Spill Response and Notification Quick Guide*, included under separate cover with the SSMP. If a Maintenance Division crew member is the first to identify a potential SSO, contact information for other division responders and for division supervisors are contained in the Field Guide and in the Field Packet (described above).

The Field Guide and the Field Packet contain communication procedures for the Maintenance Division during all stages of SSO events (response, public notification, and regulatory reporting). The Field Guide and Field Packet are carried in all field utilities vehicles, and are included under separate cover with the SSMP.

## **RESPONSE PROGRAM**

The City has a response program for potential and actual SSO events, as required by WDR D-13-vi(b) (described above), including response plans for emergency situations. The emergency response plans identify the staff, procedures, equipment, and supplies necessary for responding to SSOs. The primary SSO response plan is contained in the Maintenance Division's Field Guide and Field Packet (described above). These two documents contain procedures and strategies for all aspects of emergency situations, including communications, impact mitigation, problem solving, and regulatory reporting.

The Maintenance Division (primary responder to SSOs) owns and operates equipment and supplies that can be used to address most potential or actual SSO events. The equipment and supplies are housed at the division's Corporation Yard. The division has a fully stocked spill response trailer, spill kits in each field utilities vehicle, a jetter truck, two vacuum-tank trucks, a fully stocked television truck, portable bypass pumps, several backhoes, and replacement pipes and appurtenances. For larger SSO events, the Maintenance Division has a list of contractors that can assist with response, as documented in the Field Guide and in Section 5 of the SSMP, O&M Program.

The Utilities Department has procedures for responding to lift station malfunctions. The procedures include problem solving and emergency operations approaches, and are documented in lift station system manuals (described above). For emergency operations at lift stations, the Utilities Department maintains portable pumping and power generating equipment.

## **REGULATORY REPORTING**

The City has detailed regulatory reporting procedures and forms for SSO events, as required by WDR D-13-vi(c) (see above). The Maintenance Division's (primary responder) reporting procedures are contained in the Field Guide and in the Field Packet (described above), carried in all of the field utilities vehicles, and included under separate cover with the SSMP.

## **TRAINING/AWARENESS**

The City has procedures to ensure that appropriate staff are trained on and follow the OERP, and that contractor personnel are aware of and follow the OERP, as required by WDR D-13-vi(d) (see above). The Maintenance Division and the Utilities Department each have separate procedures.

### **Maintenance Division Procedures**

The Maintenance Division provides training for its staff on SSO emergency response and reporting activities. The division's Safety Training Plan, which includes overflow emergency training, is shown in Appendix 5N. Response training consists of practice drills, "tailgate training," and on-the-job training. Reporting training consists of tailgate training. Division supervisors are responsible for scheduling and providing overflow emergency response and reporting training. A sign-in sheet similar to the one shown in Appendix 5N is used to document participation in this training. Documentation of overflow emergency response and reporting training is filed at the Maintenance Division main office.

The Maintenance Division hires contractors occasionally to do work on its gravity sewers. Work performed by a contractor is to be conducted in accordance with two documents, the Procedures for Sanitary Sewer Overflows (SSO Procedures) and the Public Sewer Bypass Pumping Plan Submittal Checklist (Bypass Plan Checklist)—the Bypass Plan Checklist is maintained jointly by the Maintenance Division and the Utilities Department. These two documents define the responsibilities of the contractor in conducting safety procedures and in addressing emergency situations. Appendix 7A contains the example versions of the documents. The most current versions of the SSO Procedures and the Bypass Plan Checklist can be obtained from the Field Utilities Supervisor.

### **Utilities Department Procedures**

The Utilities Department OERP training consists of tailgate training and on-the-job training based on the *Master Spill Response & Notification Quick Guide* and on the lift station system manuals (described above). Department section supervisors are responsible for scheduling and providing emergency training, and for documenting and filing records of training.

The Utilities Department hires contractors occasionally to do work at the lift stations. Any work done by a contractor is to be in accordance with the department's contract specifications for a particular project and with the department's Contractor Safety Handbook. These two documents define the responsibilities of the contractor in conducting safety procedures and in addressing emergency situations. Appendix 5M contains the relevant portion of example contract specifications and an example of the Contractor Safety Handbook. Contract specifications will be tailored for each project. The most current version of the Contractor Safety Handbook can be obtained from Utilities Department supervisors.

### **TRAFFIC AND CROWD CONTROL**

The Maintenance Division (primary responders) has procedures to address emergency operations, such as traffic and crowd control, as required by WDR D-13-vi(e) (see above). For traffic control, the division follows Caltrans traffic control manual. This manual can be downloaded from Caltrans' internet site. Crowd control procedures are documented in the divisions' Field Guide and Field Packet (described above).

### **IMPACT MITIGATION**

The City has an impact mitigation program for SSO events, as required by WDR D-13-vi(f) (see above), including plans, equipment/supplies, and water body sampling capabilities for the prevention and containment of SSOs and for the minimization, characterization, and correction of SSO impacts. The impact mitigation program is described generally above under the heading "Response Program." The Maintenance Division's Field Guide and Field Packet contain impact mitigation procedures. The procedures include containment, minimization, and correction (cleaning) of SSOs. As noted above, the documents are carried in all of the field utilities vehicles, and included under separate cover with the SSMP. If water body sampling is warranted during an SSO event, the Utilities Department's Water Quality Section is notified. The Utilities Department operates a California State Environmental Laboratory Accreditation Program (ELAP) certified water quality laboratory that has the staff, equipment, and procedures for collecting and analyzing water body samples during an SSO event.