

## **ELEMENT 5: OVERFLOW EMERGENCY RESPONSE PLAN**

This section sets forth the BCPUD's Sanitary Sewer Overflow Emergency Response Plan and fulfills the SWRCB Element 5 SSMP requirements.

### **SWRCB REQUIREMENTS FOR THE OVERFLOW EMERGENCY RESPONSE PLAN ELEMENT**

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

- (a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSO's in a timely manner;
- (b) A program to ensure an appropriate response to all overflows;
- (c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities of all SSOs that potentially affect public health or reach the waters of the State in accordance with the all applicable law and permit requirements. The SSMP should identify the officials who will receive immediate notification;
- (d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (e) Procedures to address emergency operations;
- (f) 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.

## **INTRODUCTION**

The purpose of this Sanitary Sewer Overflow Emergency Response Plan is to ensure that the BCPUD complies with regulatory requirements of the Order in containing, cleaning-up, decontaminating and reporting SSOs or other discharges to a drainage channel or surface water which occur within the BCPUD's service area. This plan provides standard response procedures to ensure that every report of a confirmed sewage overflow is immediately dispatched to the appropriate crews so that the effects of the overflow can be minimized with respect to impacts to public health and adverse effects on beneficial uses and water quality of surface waters and customer service. This Response Plan also includes provisions to ensure that notification and reporting is made to the appropriate local, state and federal authorities.

The primary objectives of this Plan are:

- To protect public health, water environment and beneficial uses of receiving waters;
- To mitigate any adverse impacts on the public and to the environment;
- To ensure a timely response to uncontrolled releases of untreated or partially treated wastewater;
- To establish a basis for corrective action to prevent uncontrolled releases of wastewater;
- To satisfy regulatory agency requirements;
- To minimize risk of enforcement actions against the District.

Additional objectives of this Plan include:

- To provide appropriate customer service;
- To protect wastewater treatment plant and collection system personnel;
- To protect the collection system, wastewater treatment facilities, and all appurtenances;
- To protect private and public property beyond the collection and treatment facilities.

## **OVERFLOW EMERGENCY RESPONSE TEAM**

The BCPUD's overflow emergency response team members include:

- General Manager;

- Chief Operator – Wastewater;
- Shift Operators/Operator(s) in Training;
- Engineering Consultants;
- Legal Consultants.

In general, if any SSO occurs the Chief Operator – Wastewater, aided by the Shift Operator(s) and/or Operator(s)-in-Training will be in charge of the clean-up for any spills. During an emergency, the Chief Operator – Wastewater will assume the responsibilities of the Incident Commander (IC) for the clean-up activity. If an incident occurs after-hours or on a weekend, the IC will be the on-duty staff or the first Shift Operator on scene, when notified of a spill or discharge.

The responsibilities of each position during the overflow emergency are described as follows:

- General Manager – Serves as direct contact for any media inquiries and inquiries from the Board of Directors and regulatory authorities. Arranges for all public statements regarding the district’s emergency response. Responsible for all reporting (telephonic and electronic) to regulatory authorities.
- Chief Operator - Wastewater – In charge of spill response and clean-up. In direct contact with the General Manager to report on status of clean-up. Responsible for conducting environmental assessment of situation and performing duties of the IC unless and until relieved by higher authority.
- Shift Operators/Operator in Training – Responsible for performing clean-up tasks as assigned by the Chief Operator or, in the absence of the Chief Operator, for performing the responsibilities of the Chief Operator, unless and until relieved by higher authority.
- Engineering Consultant – Responsible for providing technical assistance as needed to the IC and for coordinating internal and outside remediation efforts if and when necessary;
- Legal Consultant – Responsible for providing legal advice to the IC when necessary.

Contact information for each of the foregoing positions is presented in Exhibit 1 to this Element 4. Contact information for external emergency assistance (i.e., local contractors and bypass pumping companies) is presented in Exhibit 2 to this Element 4.

## **OVERFLOW RESPONSE PROCEDURE**

The Overflow Response Procedure presents a strategy for the BCPUD to mobilize labor, materials, tools and equipment to correct or repair any condition that may cause or contribute to an unauthorized discharge or SSO.

The BCPUD's Overflow Emergency Action Flow Chart is presented in Exhibit 3 to this Element 4.

## **RECEIPT OF INFORMATION REGARDING A SANITARY SEWER OVERFLOW**

An SSO may occur due to the wastewater collection system failure, or wastewater treatment plant failure, or failure of the lift station. The BCPUD has established various procedures to receive information regarding SSOs caused at these different locations.

### **SANITARY SEWER OVERFLOW DUE TO WASTEWATER COLLECTION SYSTEM FAILURE OR WASTEWATER TREATMENT PLANT FAILURE**

SSOs due to wastewater collection system failure or wastewater treatment plant failure may be detected by a BCPUD employee or by others, including the general public. The BCPUD's main office (phone number 415-868-1224) is primarily responsible for receiving phone calls from the public of possible sewer overflows and for forwarding to the in-charge sewer personnel (usually the Chief Operator - Wastewater or the On-Duty Shift Operator if the Chief Operator cannot be reached). After hours, the district's answering service will page the on-call Shift Operator. The Chief Operator or the on-call Shift Operator will then assume the responsibilities of the IC for the clean-up activity unless and until relieved by higher authority.

Residents who observe a sewer system overflow may also call the Bolinas Fire Protection District or County Sheriff to report an overflow. Under this circumstance, the Fire District or law enforcement will forward the call to the BCPUD.

### **SANITARY SEWER OVERFLOW DUE TO LIFT STATION FAILURE**

An SSO may also occur due to the failure of the lift station. The lift station is equipped with float devices that will activate an alarm in the event of a high level in the wet well and page the office or, if after hours, the on-call operator. If the office is called, the General Manager or Administrative Assistant will immediately notify the Chief Operator or a Shift Operator if the Chief Operator is unavailable. If the on-call operator is paged, he or she is required to be on-site within 20 minutes. If the on-call operator fails to respond within 5 minutes by calling to acknowledge the alarm, the auto-dialer will continue to page the on-call operator until the alarm is acknowledged and reset at the lift station.

## **DISPATCH OF APPROPRIATE CREWS TO SITE OF SANITARY SEWER OVERFLOW**

After receiving notification of a potential or actual sewer system overflow, the IC will dispatch the appropriate personnel and resources as required. Staff and equipment shall be available to respond immediately to any SSO location.

Once it is confirmed that BCPUD is responsible for the sewer system overflow, the IC shall notify the General Manager regarding the SSO location. If the BCPUD is not responsible for the SSO, the IC shall notify the responsible party and offer necessary assistance to the responsible party as requested.

Sewer laterals are the responsibility of the home/business owner. These owners are responsible for their laterals from the building to the BCPUD's wastewater main in the easement or street. If an SSO occurs in lateral, the BCPUD shall contact the resident or business owner and advise them that they should not discharge wastewater into their lateral until a repair has been completed. The staff of the District will then instruct them as to how to alleviate the problem using a plumber or other services. The staff will monitor their progress in order to ensure that the SSO is remediated.

## **CREW INSTRUCTION AND WORK ORDERS**

BCPUD staff should receive instruction from the IC regarding appropriate crews, materials supplies, and equipment needed to respond to an SSO. All employees dispatched to the site of an SSO shall proceed immediately to the site of the overflow. Any delays or conflicts in assignments must be immediately reported to the IC for resolution. Response staff should in all cases take photographs and report their findings, including possible damage to private and public property, to the IC immediately upon making their investigation. If the IC has not received findings from the field crew within thirty minutes, the IC shall contact the response crew to determine the status of the investigation.

## **ADDITIONAL RESOURCES**

The IC should receive and shall convey to appropriate parties requests for additional personnel, material suppliers and equipment from crews working at the site of a sewer overflow.

## **PRELIMINARY ASSESSMENT OF DAMAGE TO PRIVATE AND PUBLIC PROPERTY**

Responding BCPUD staff should assess and report any damage to public or private property as a result of the SSO immediately. Staff should use discretion in assisting the property owner/occupant as reasonably as they can and should avoid inflicting any further damage to private property. Staff may enter private property for purpose of assessing damage and taking appropriate still photographs and video footage, if possible, of the outdoor area of the sewer overflow and impacted area in order to thoroughly document the nature and extent of impacts. Available photographs should be forwarded to the BCPUD office for filing with the SSO report.

## **COORDINATION WITH HAZARDOUS MATERIAL RESPONSE**

Upon arrival at the scene of an SSO, should a suspicious substance (e.g. oil sheen, foamy residue) be found on the ground surface, or should a suspicious odor not common to the sewer system be detected, the responding staff should immediately contact the IC or Chief Operator – Wastewater for guidance before taking further action.

Should the IC or Chief Operator determine the need to alert a hazardous material response team, BCPUD staff shall await the arrival of Bolinas Fire Department personnel or until appropriate regulatory agencies to take over the scene. Only when that authority determines it is safe and appropriate for the sewer staff to proceed can they then proceed with the containment, clean-up activities and correction.

## **OVERFLOW CORRECTION, CONTAINMENT AND CLEAN-UP**

The objectives of SSO correction, containment and clean-up are:

- To protect public health, environment and property from sewer system overflows and restore surrounding area back to normal as soon as possible;
- To establish perimeters and control zones with appropriate traffic cones and barricades, vehicles or use of natural topography (e.g. hills, berms);
- To promptly notify the regulatory agencies' communication centers of preliminary overflow information and potential impacts;
- To contain and remove the SSO to the maximum extent possible, including preventing the discharge of sewage into surface waters; and
- To minimize the BCPUD's exposure to any regulatory agency penalties and fines.

## **RESPONSIBILITY OF RESPONSE CREW UPON ARRIVAL**

It is the responsibility of the first personnel who arrive at the site of a sewer system overflow to protect the health and safety of the public by mitigating the impact of the overflow to the extent possible. Should the SSO not be the responsibility of the BCPUD but there is imminent danger to public health, public or private property, or to the quality of waters of the United States, then prudent emergency action should be taken until the responsible party assumes responsibility. Upon arrival at an SSO, the response crew should do the following:

- Make an assessment of the SSO and what is needed to make the work area safe, determine the equipment and personnel necessary to correct, contain and clean-up the overflow;

- If possible, take immediate steps to stop the overflow, e.g. relieve pipeline blockage, manually operate pump station controls, repair pipe, etc.;
- If appropriate, take immediate steps to reduce or eliminate any overflow to surface waters or to drainage tributaries to surface waters;
- Fully assess the SSO site to estimate of the volume of the spill, make all necessary measurements to assist in this such as flow depths, distances, and size of water pools, etc.;
- Interview the person or persons who reported the SSO for additional information to determine as accurately as possible how long the SSO may have been flowing before it was reported in order to accurately determine the SSO start time.
- Notify the IC, Chief Operator and/or General Manager immediately upon completion of the assessment;
- Inform the IC, Chief Operator and/or General Manager if the school is in the vicinity of the affected overflow area, and the BCPUD office will contact the school and inform them of the current situation;
- Determine if private property is impacted; if yes, the IC or Chief Operator should be informed;
- If damage to private property has occurred, do not attempt any clean-up work until the area has been photographed and the Chief Operator is on site;
- If so instructed, post the area with proper warning signs;
- Photograph the affected area, if possible;
- Make the work area safe by donning protective gear, etc.;
- If the SSO was caused by a blockage in the BCPUD's sewer collection main, clean the main to both the upstream and downstream manholes, then check the upstream sewer main for additional problems which may have developed.

## **INITIAL MEASURES FOR CONTAINMENT**

Initiate measures to contain the SSO and recover, where possible, wastewater that has already been discharged, including the following:

- Determine the immediate destination of the SSO, e.g. storm drain, street curb gutter, body of water, creek bed, etc.;
- Identify and obtain the necessary materials and equipment to contain or isolate the overflow, if not otherwise readily available at the BCPUD's lift station, treatment plant or maintenance yard;

- Take immediate steps to contain the SSO, e.g. block or bag storm drains, recover through vacuum truck, divert into downstream manhole, etc.;
- Where possible, the best solution to a spill is to direct the flow to a downstream manhole, where this is not possible, divert to holding areas on vacant lots, culverts or storm water basin;
- Use site features such as natural low areas, berms, curbs, storm-drain basins, culverts, vacant lots and fields to advantage while performing the containment procedures; and
- Unless absolutely essential, do not excavate to create a holding area. If excavation cannot be avoided, the area should be checked for underground utilities by Underground Service Alert before excavation begins.

## **CONTROL**

If an SSO occurs in the collection system, control of the SSO is normally obtained by clearing the pipeline blockage using hydro-flushing or snakes. In the event clearing the pipeline blockage is not successful, set up a portable bypass pumping station, use a pump truck(s) or temporary, in-ground or above ground bypass piping, either gravity fed or pressurized, or other various methods.

Appropriate measures shall be taken to determine the proper size and number of pumps required to effectively handle the sewage flow and continuous or periodic monitoring of the by-pass pumping operation shall be implemented as required.

If an SSO occurs at the wastewater treatment plant, control of the SSO should be obtained by correcting the operational error and/or clearing any obstruction.

## **SAMPLING AND LAB TESTS**

When sewage discharges to surface waters, various regulatory authorities must be notified as explained elsewhere in this SSMP. As part of this notification process, bacteriological and other sampling will be performed and reported to Marin County EHS. Samples must be taken upstream of the entry point, just downstream of the entry point and at a distance downstream of the entry point. The actual sample point chosen will vary on a case-by-case basis. Samples should be collected as soon as possible, the response crew shall call the Chief Operator and request that the samples are taken at the spill location. The samples will be analyzed for total Coliform, E. Coli and/or Enterococcus, dissolved oxygen and ammonia.

## **CLEAN-UP**

SSO sites are to be thoroughly cleaned after an overflow. No readily identified residue (e.g. sewage solids, papers, rags, plastic, rubber products) shall remain.

- Before clean-up is begun, operators should photograph the area affected, if possible. Photographs should show all damage to property whether public or private. After the clean-up effort has been completed, the area should be photographed again using, to the extent possible, the same camera angles.
- The overflow site is to be secured to prevent contact by members of the public until the site has been thoroughly cleaned; posting if required should be undertaken pursuant to the Section below entitled “Public Advisory Procedure”.
- Samples of the spill material may be requested, the response crew shall check with the Chief Operator before disposing of liquids removed from the site.
- If the SSO has occurred on paved streets, the liquid can be vacuumed up to a truck and either directed to a nearby manhole or to the district’s wetwell, or transported to the treatment ponds at 101 Mesa Road. The affected area should then be hosed down with clean de-chlorinated water and the wash water contained, vacuumed up and disposed of in the same manner as the sewage. Neither raw sewage nor wash water should be allowed to flow to surface waters or to drainage structures which are not under immediate control.
- If the SSO occurs on an unpaved surface, as much liquid as possible should be removed by vacuuming as above and disposed of properly. If feasible, wash the area down with clean de-chlorinated water and again remove the wash water.
- Regardless of the surface area where the SSO occurred, it is a good procedure to broadcast lime onto moist soil or standing sewage. This can suppress odors and kill many harmful bacteria associated with raw sewage. Lime should never be spread on or adjacent to planted areas, however, as damage to plant growth can occur.
- Where the sewage has resulted in ponding, the pond should be pumped dry and the residue disposed properly.
- If a ponded area contains sewage that cannot be pumped dry, it may be treated with bleach. However, if the sewage has discharged into a body of water that may contain fish or other aquatic life, bleach or other appropriate disinfectant should not be applied and the State fish and wildlife agency should be contacted for specific instructions.
- When an SSO occurs inside a building, clean-up should not be attempted unless the Chief Operator is present. The affected area should always be photographed both before and after clean-up. Mop, squeegee and wet vacuum all surfaces exposed to the sewage. Flush surfaces with clean de-chlorinated water and re-mop and vacuum.
- Use of a portable aerator may be required where complete recovery of sewage is not practical and where severe oxygen depletion in existing surface water is expected.

## OVERFLOW FIELD REPORT

An Emergency Sewage Spill Report (as presented in Exhibit 4) should be completed for all SSOs and the IC should be promptly notified when the overflow is eliminated. The Emergency Sewage Spill Report should include the following information:

- The location and address of the SSO;
- Date and time information received and/or reported to have begun and later substantiated by the IC or response crew;
- Indication and description as to whether the BCPUD is responsible for the SSO or not;
- Name, address, phone number of the owner where property damage occurred, if applicable;
- Description of all damage and inventory of all properties, with the occupants' signatures on list, if applicable;
- Indication and explanation as to whether drinking water sources were threatened or not;
- Indication as to whether sewage reached surface waters or whether there was obvious indication (e.g. sewage residue) that sewage flowed to the surface waters;
- Indication as to whether the sewage overflow did not reach surface waters, such as where observation or on-site evidence clearly indicates all sewage was retained on land and did not reach surface water and where complete clean-up occurs leaving no residue;
- Determination of the duration of the SSO;
- Determination of the volume of the SSO;
  - a. When the rate of overflow is known, multiply the duration of the overflow by the overflow rate; or
  - b. When the rate of overflow is not known, investigate the surrounding area for evidence of ponding or other indication of overflow volume.
- Description of the actions taken to lessen damage;
- Description of the actions taken to prevent human contact and odors;
- Description of the actions taken to prevent reoccurrence of overflow;
- Description of the clean-up activities;

- Description of repair activities;
- Determination of the cost breakdown;
- Estimation of the property damage.

## **PUBLIC ADVISORY PROCEDURE**

The BCPUD, usually in consultation with the Marin County Environmental Health Services department, has primary responsibility for determining when to post notices of polluted surface water bodies or ground surfaces that result from uncontrolled wastewater discharges from its facilities. The postings do not necessarily prohibit use of recreational areas, unless posted otherwise, but provide a warning of potential public health risks due to sewage contamination. The Chief Operator – Wastewater, working in consultation with the General Manager, shall determine if posting of a confirmed overflow is undertaken or if there is reasonable potential for an overflow to occur -- thus the need to post in advance.

Should the posting of surface water bodies or ground surfaces subjected to an SSO be deemed necessary by the Chief Operator - Wastewater, he/she shall also determine the need for further public notification through the use of pre-scripted notices made available to the printed or electronic news media for immediate publication or airing, or by other measures (e.g., front door hangers).

## REGULATORY AGENCY NOTIFICATION PROCEDURE

The BCPUD shall report all SSOs to the SWRCB's Online SSO Database through their website <http://ciwqs.waterboards.ca.gov> in a timely manner. The BCPUD is also required to report to other authority agencies pursuant to local, state and federal regulations.

The BCPUD's authorized representative in all sewer system matters is the General Manager. The General Manager is authorized to submit SSO reports to the appropriate government agencies and to certify electronic spill reports submitted to the SWRCB.

## SANITARY SEWER OVERFLOW CATEGORIES

- Category 1 – All discharges of untreated or partially treated wastewater of any volume resulting from a failure in the District's sanitary sewer system or flow condition that:
  - a. Reach surface waters and/or reach a drainage channel tributary to a surface water; or
  - b. Reach a Municipal Separate Storm Sewer System (MS4) and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharged to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond)
- Category 2 – Discharges of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from the District's sanitary sewer system failure or flow condition that does not reach surface water, a drainage channel, or a MS4 unless the entire SSO discharged to the storm drain system is fully recovered and disposed of properly.
- Category 3 – All other discharges of untreated or partially treated wastewater resulting from a failure or flow conditions of the district's sanitary sewer system.
- Private Lateral Sewage Discharges – Sewage discharges that are caused by blockages or other problems within a privately owned lateral connected to the BCPUD's sewer system.

## SANITARY SEWER OVERFLOW REPORTING TIMEFRAMES

- Category 1 SSOs – All SSOs that meet the above criteria for Category 1 SSOs *and* are greater than or equal to 1,000 gallons in volume discharged to surface water or spilled in a location where it probably will be discharged to a surface water must be

reported to Cal-EMA (by telephone) as soon as possible, but not later than 2 hours of becoming aware of the SSO.

- Category 1 and Category 2 SSOs – All SSOs that meet the above criteria for Category 1 or Category 2 SSOs shall be reported to the CIWQS online SSO database:
  - a. Draft reports for Category 1 and Category 2 SSOs shall be submitted to the CIWQS online database within three (3) business days of the district becoming aware of the SSO. Minimum information that shall be reported in a draft Category 1 or draft Category 2 SSO report shall include all information identified in the Mandatory Information to be Included in SSO Online Reporting section, as applicable, below.
  - b. A final Category 1 or Category 2 SSO report shall be certified through the CIWQS online database within 15 calendar days of the end date of the SSO. Minimum information that shall be certified in the final Category 1 or final Category 2 SSO report shall include all information identified in the Mandatory Information to be Included in SSO Online Reporting section, as applicable, below.
- Category 3 SSOs – All SSOs that meet the above criteria for Category 3 SSOs shall be reported to the CIWQS online SSO database and certified within 30 calendar days after the end of the calendar month in which the SSO occurs (e.g., all Category 3 SSOs occurring in the month of February shall be entered into the database and certified by March 30). Minimum information that shall be included in a final Category 3 report shall include all information identified in the Mandatory Information to be Included in SSO Online Reporting section, as applicable, below.
- “No Spill” Certification – If there are no SSOs during the calendar month, the district shall either 1) certify, within 30 calendar days after the end of each calendar month, a “no Spill” certification statement in the CIWQS online SSO database certifying that there were no SSOs for the designated month.

If there are no SSOs during a calendar month but the district reported a Private Sewer Lateral Discharge, the district shall still certify a “No Spill” certification statement for that month.

- Collection System Questionnaire: update and certify every 12 months
- Amended SSO Reports – the district may update or add additional information to a certified SSO report within 120 calendar days after the SSO end date by amending the report or by adding an attachment to the SSO report in the CIWQS online SSO database.
- SSO Technical Reports – the district shall submit an SSO Technical Report in the CIWQS Online SSO database within 45 calendar days of the SSO end date for any SSO in which 50,000 gallons or greater are spilled to surface waters. This report, which does not preclude the Water Boards from requiring more detailed analyses if requested, shall include at a minimum, the following:

1. Causes and Circumstances of the SSO:
    - a. Complete and detailed explanation of who and when the SSO was discovered;
    - b. Diagram showing the SSO failure point, appearance point(s) and final destinations(s);
    - c. Detailed description of the methodology employed and available data used to calculate the volume of the SSO and, if applicable, the SSO volume recovered;
    - d. Detailed description of the cause(s) of the SSO;
    - e. Copies of the original field crew records used to document the SSO; and
    - f. Historical maintenance records for the failure location.
  
  2. District's Response to the SSO:
    - a. Chronological narrative description of all actions taken by the district to terminate the spill;
    - b. Explanation of how the SSMP Overflow Emergency Response plan was implemented to respond to and mitigate the SSO.
    - c. Final corrective action(s) completed and/or planned to be completed, including a schedule for actions not yet completed.
  
  3. Water Quality Monitoring:
    - a. Description of all water quality sampling activities conducted including analytical results and evaluation of the results
    - b. Detailed location map illustrating all water quality sampling points.
- Private Lateral Sewage Discharges – All sewage discharges greater than or equal to 1,000 gallons of untreated or partially treated wastewater that result or may result in a discharge to surface water resulting from failures or flow conditions within a privately owned sewer lateral may be voluntarily reported to Cal OES or to the Online SSO Database. If a Private Lateral Sewage Discharge is recorded in the SSO Database, the District must identify the sewage discharge as occurring and caused by a private lateral, and a responsible party (other than the BCPUD) should be identified, if known.
  - In the event that the SSO Online Database is not available, the BCPUD should fax or email all required information to the appropriate RWQCB office in accordance

with the time schedules identified above. In such event, the BCPUD must also enter all required information into the CIQWS Online SSO Database as soon as practical.

Pursuant to Health and Safety Code section 5411.5, the BCPUD also shall immediately report to the Environmental Health Services (EHS) department of the County of Marin any SSO that may be discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State including storm drains and drainage channels

The BCPUD's notification policy also includes reporting to the following agencies and other interested or possibly impacted parties, as necessary, immediately after the discovery of the violation:

- Regional Water Quality Control Board for the San Francisco Bay Area;
- California Emergency Management Agency;
- Marin County EHS, Open Space District (as appropriate) and Office of Emergency Services;
- Audubon Canyon Ranch (as appropriate);
- Gulf of the Farallones National Marin Sanctuary (as appropriate).

The contact information for the agencies to be notified is presented in Exhibit 4.

## **MANDATORY INFORMATION TO BE INCLUDED IN SANITARY SEWER OVERFLOW ONLINE REPORTING**

- Draft Category 1 SSOs:
  - a. SSO Contact Information: Name and telephone number of district contact person who can answer specific questions about the SSO being reported;
  - b. SSO Location Name;
  - c. Location of the SSO by GPS coordinates. If a single overflow event results in multiple appearance points, GPS coordinates should be provided for the appearance point closest to the failure point and each additional appearance point in the SSO should be described;
  - d. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure;
  - e. Whether or not the SSO reached a municipal separate storm drain system;

- f. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.
- g. Estimated SSO volume, inclusive of all discharge point(s);
- h. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain;
- i. Estimate of the SSO volume recovered (if applicable);
- j. Number of SSO appearance point(s);
- k. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
- l. SSO start date and time.
- m. Date and time district was notified or, or self-discovered, the SSO;
- n. Estimated operator arrival time;
- o. For spills greater than or equal to 1,000 gallons, the date and time CAL-OES was called.;
- p. For spills greater than or equal to 1,000 gallons, the Cal-OES control number.
- Certified Category 1 SSOs (in addition to the above information for a Draft Category 1 SSO):
  - a. Description of SSO destination(s);
  - b. SSO end date and time;
  - c. SSO causes (mainline blockage, roots, etc.);
  - d. SSO failure points (main, lateral, etc.);
  - e. Whether or not the spill was associated with a storm event;
  - f. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the overflow and a schedule of major milestones for those steps;
  - g. Description of spill response activities;
  - h. Spill response completion date;
  - i. Whether or not there is an ongoing investigation, the reasons for the investigation and the expected date of completion;

- j. Whether or not a beach closure occurred or may have occurred as a result of the SSO;
  - k. Whether or not health warning were posted as a result of the SSO;
  - l. Name of beache(es) closed or impacted. If no beach was impacted, NA shall be selected;
  - m. Name of surface water(s) impacted;
  - n. If water quality samples were collected, identify parameters the water quality samples were analyzed for. If no samples were taken, NA shall be selected;
  - o. If water quality samples were taken, identify which regulatory agencies received same results (if applicable). If not samples were taken, NA shall be selected;
  - p. Description of methology(ies) and type of data relied upon for estimations of the SSO volume discharged and recovered; and
  - q. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Data base will issue a final SSO identification (ID) number.
- Draft Category 2 SSOs: At a minimum, the following mandatory information shall be reported for a draft Category 2 SSO report:
    - r. Items a – n, above for a Draft Category 1 SSO.
  - Certified Category 2 SSOs: At a minimum, the following mandatory information shall be reported for a certified Category 2 SSO report:
    - s. Items a – n, above for a Draft Category 1 SSO and items a – i and item q, above, for a Certified Category 1 SSO.
  - Certified Category 3 SSOs: At a minimum, the following mandatory information shall be reported for a certified Category 3 SSO report:
    - a. Items a – n, above for a Draft Category 1 SSO and items a – f and item q, above, for a Certified Category 1 SSO.

## WATER QUALITY MONITORING REQUIREMENTS

Order No. WQ 2013-0058-EXEC amended the Order in 2013 to require all enrollees to implement an SSO Water Quality Monitoring Program to assess impacts from SSOs to surface water in which 50,000 gallons or greater are spilled to surface waters and provided that the SSO Water Quality Monitoring Program shall, at a minimum:

- a. Contain protocols for water quality monitoring;
- b. Account for spill travel time in the surface water and scenarios where monitoring may not be possible (safety, access restrictions, etc.);
- c. Require water quality analyses for ammonia and bacterial indicators to be performed by an accredited or certified laboratory;
- d. Require monitoring instruments and devices used to implement the SSO Water Quality Monitoring Program to be properly maintained and calibrated, including any records to document maintenance and calibration, as necessary, to ensure their continued accuracy;
- e. Within 48 hours of the district becoming aware of an SSO, require water quality sampling for, at a minimum, the following constituents:
  - a. Ammonia
  - b. Appropriate bacterial indicator(s) per the applicable Basin Plan water quality objective or Regional Board direction which may include total and fecal coliform, enterococcus and e-coli.

4. The BCPUD's Water Quality Monitoring Program is attached to this SSMP as Appendix

In addition, water quality sampling and testing are required whenever spilled sewage enters a surface water (regardless of the size of the spill) to determine the extent and impact of the SSO. The following guidelines must be followed:

- The BCPUD shall notify the County of Marin's Environmental Health Services (EHS) Department of the SSO and request sampling requirements and instructions. In general, samples should be collected as soon as possible after the discovery of the SSO event.
- For spills less than 1,000 gallons, the County of Marin EHS Department generally requires, at a minimum, that water quality samples be collected at the discharge point, 100 feet upstream, and 100 feet downstream on a daily basis until instructed otherwise.
- If a spill is more than 1,000 gallons, additional sites may be required to be sampled and requirements will be established by the County of Marin EHS Department.

- If a spill reaches a large water body, the water quality samples should be collected near the point of entry of the spilled sewage and every 100 feet along the shore of stationary water bodies or otherwise as directed by the County of Marin. The procedure for water quality sampling is included in Appendix 4 - Water Quality Monitoring Program Plan.

## **SANITARY SEWER OVERFLOW RECORD KEEPING REQUIREMENTS**

The following records shall be maintained by the district for a minimum of five (5) years and shall be made available for review by the Water Boards during an onsite inspection or through an information request:

1. General Records: The district shall maintain records to document compliance with all provisions of the SSO WDRs and Monitoring and Reporting Program orders for each sanitary sewer system owned including all required records generated by the district's sanitary sewer system contractors.
2. SSO Records: the district shall maintain records for each SSO event, including but not limited to:
  - i. Complaint records documenting how the district responded to all notifications of possible or actual SSOs, both during and after business hours, including complaints that do not result in SSOs. Each complaint record shall, at a minimum, include the following information;
    - a. Date, time and method of notification;
    - b. Date and time the complainant or informant first noticed the SSO;
    - c. Narrative description of the complaint, including any information the caller can provide regarding whether or not the complainant or informant reporting the potential SSO knows if the SSO has reached surface waters, drainage channels or storm drains;
    - d. Follow-up return contract information for complainant or informant for each complaint received, if not reported anonymously; and
    - e. Final resolution of the complaint.
  - ii. Records documenting steps and/or remedial actions undertaken by the district, using all available information, to comply with Section D.7 of the SSS WDRs.
  - iii. Records documenting how all estimate(s) of volume(s) discharged and, if applicable, volume(s) recovered were calculated.

3. Records documenting all changes made to the SSMP since its last certification indicating when a subsection(s) of the SSMP was changes and/or updated and who authorized the change or update. These records shall be attached to the SSMP.
4. Electronic monitoring records relied upon for documenting SSO event and/or estimating the SSO volume discharged, including, but not limited to records from:
  - i. Supervisor Control and Data Acquisition (SCADA) systems;
  - ii. Alarm system(s); and
  - iii. Flow monitoring device(s) or other instrument(s) used to estimate wastewater levels, flow rates and/or volumes.

## **MEDIA NOTIFICATION PROCEDURE**

When an SSO occurs and media personnel arrive at the overflow site the response crew shall refer them to the General Manager or the District office. All employees of the BCPUD are expected to be polite, courteous and professional.

When an overflow has been confirmed and it is a threat to public health, the response crew should verify the overflow and report back to the IC, and the IC shall inform the General Manager, who shall be the district's authorized representative for the media.

## **DISTRIBUTION AND MAINTENANCE OF THIS PLAN**

Copies of this Plan and any amendment should be distributed to:

- All of the personnel who may become incidentally involved in responding to overflows should be familiar with this Plan;
- The Bolinas Fire Protection District; and
- The County of Marin Environmental Health Services department.

## **REVIEW AND UPDATE OF THIS PLAN**

This plan should be reviewed annually and amended as appropriate to reflect all changes in policies and procedures as may be required to achieve its objectives. This Plan should also be updated with the issuance of a revised or new State waste discharge permit.

The BCPUD shall conduct annual training sessions with appropriate personnel and review and update, as needed, the various contact person lists included in the Plan.