

# Sewage Spill Reduction Action Plan



On Behalf of:

**Almonte Sanitary District**  
**Homestead Valley Sanitary District**

**Alto Sanitary District**  
**Richardson Bay Sanitary District**  
**Tamalpais Community Services District**

**City of Mill Valley**  
**Sewerage Agency of Southern Marin**

In Response to  
Docket No.: CWA-309(a)-08-030

**Revised: August 2009**

**Original: October 2008**

## Certification and Signatures

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



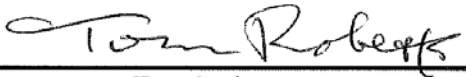
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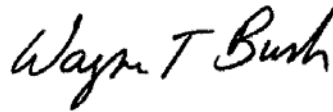
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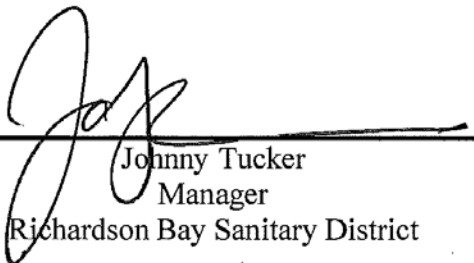
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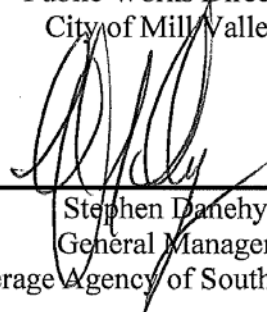
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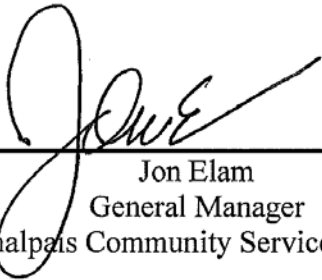
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**Appendices**

- Appendix A - Amended Order for Compliance**
- Appendix B - Sewerage Agency of Southern Marin SSORP**
- Appendix C - Almonte Sanitary District SSORP**
- Appendix D - Alto Sanitary District SSORP**
- Appendix E - City of Mill Valley SSORP**
- Appendix F - Homestead Valley Sanitary District SSORP**
- Appendix G - Richardson Bay Sanitary District SSORP**
- Appendix H - Tamalpais Community Services District SSORP**
- Appendix I - SSO Locations**
- Appendix J - Cleaning and Emergency Service Contracts**
- Appendix K - Mill Valley FOG Policy**
- Appendix L - Richardson Bay Defect Coding System**



**List of Abbreviations**

Alto	Alto Sanitary District
Almonte	Almonte Sanitary District
BMP	Best Management Practice
CCTV	Closed Circuit Television
EDU	Equivalent Domicile (Dwelling) Units
EHS	County of Marin Environmental Health Services
EPA	U.S. Environmental Protection Agency
FOG	Fats, Oils, and Grease
FSE	Food Service Establishment
GI	Grease Interceptor
GRD	Grease Removal Device
GT	Grease Trap
GWDR	Statewide General Waste Discharge Requirements
HVSD	Homestead Valley Sanitary District
I/I	Infiltration and Inflow
MACP	Manhole Assessment and Certification Program
Mill Valley	City of Mill Valley
MH	Maintenance Hole
MMS	Maintenance Management System
NASSCO	National Association of Sewer Service Companies
NDPES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
Order	EPA Order for Compliance
PACP	Pipeline Assessment and Certification Program
PS	Pump Station
RBSD	Richardson Bay Sanitary District
SASM	Sewerage Agency of Southern Marin
SOP	Standard Operating Procedure
SSO	Sanitary Sewer Overflow
SSORP	Sanitary Sewer Overflow Response Plan
SSMP	Sewer System Management Plan
SSRAP	Sewage Spill Reduction Action Plan
SWRCB	State Water Resources Control Board
TCSD	Tamalpais Community Services District
WWTP	Wastewater Treatment Plant

## Section 1 Overview

### 1.1 Purpose of Document

#### 1.1.1 General

An Order for Compliance (Order), included in Appendix A, was issued by the U.S. Environmental Protection Agency (EPA) to compel the Sewerage Agency of Southern Marin (SASM), Almonte Sanitary District (Almonte), Alto Sanitary District (Alto), City of Mill Valley (Mill Valley), Homestead Valley Sanitary District (HVSD), Richardson Bay Sanitary District (RBSD), and Tamalpais Community Services District (TCSD), collectively known as SASM and its member agencies, to “consistently and substantially reduce the frequency and volume of sewage spills to waters of the United States” and to “complete improvements necessary to eliminate conditions in its collection system that cause or contribute to wastewater spills from SASM’s collection system or wastewater treatment plant.” In addition, the Order states that “SASM shall... achieve consistent compliance with its 2007 [NPDES] Permit”. (*CWA-309(a)-08-030*)

This Sewage Spill Reduction Action Plan (SSRAP) is the first of several submissions to the EPA and the San Francisco Regional Water Quality Control Board (RWQCB). This first submittal addresses the October 2008 requirements of the Order. The objectives of the submittal are:

- Document the past and current activities and programs that will lay the foundation for the necessary future programs and work;
- Identify the plan for identifying the condition of the facilities. This knowledge will lead to more efficient and strategic improvements to the system;
- Document the named parties’ progress towards meeting the goals of the Order; and
- Outline procedures to improve the parties’ responsiveness and ability to protect the welfare of the general public and the environment.

The purpose of each section in the Order is further developed in the subsections below and throughout this submittal.

Future SSRAP submissions will help SASM and its member agencies to move closer to completely achieving the goals as stated in the Order.

#### 1.1.2 Spill Response, Record Keeping, Notification, and Reporting

Section 2 of this SSRAP submittal addresses how the parties should respond to spills and the follow-up actions that must occur after spills. Objectives include:

- Establish procedures and metrics for Sanitary Sewer Overflow (SSO) response;
- Establish procedures for the responders to follow during the response to and mitigation of an SSO, including notification of affected portions of the public;
- Identify resources, both equipment and personnel, that are necessary to effectively respond to an SSO;
- Establish procedures for adequate recordkeeping to satisfy regulatory requirements and to use the information obtained during the SSO to better maintain and operate the collection system; and
- Establish procedures for notifying the appropriate regulatory agency in a timely manner.

#### 1.1.3 Collection System Maintenance and Management

Section 3 of this SSRAP submittal addresses the ability of the named parties to maintain and manage the collection system. In addition to identifying a management system strategy for the named parties, this section describes the individual programs that are currently being implemented, as well as establishes

schedules for the modifications to those programs that are mandated by the Order. The focus of these programs is to maintain those areas that are consistently subject to blockages, as they present the highest risk areas for SSOs. Pump stations, though an important part of avoiding constrictions in the conveyance system, are not addressed in this document, but will be addressed in a future SSRAP submittal.

#### 1.1.4 Collection System Assessments

SASM and its member agencies have chosen to address the Collection System Assessments requirements in two sections of the submittal. Section 4 of this SSRAP submittal addresses the need to assess and understand the condition of the sewer pipes and maintenance holes (MHs). The section will provide a basis for quality inspections and evaluation of the available information. In addition, a plan to assess the condition of the entire system by April of 2010 is detailed.

Section 5 of this SSRAP submittal outlines the plan to obtain the flow data that will be needed to determine the capacity of the sewer system. In future submittals of the SSRAP, this information will be used to develop system models to predict, simulate, and identify locations with high infiltration and inflow (I/I) and portions of the system that act as bottlenecks, and answer questions about how flow from one party impacts the sewer system performance of a neighboring party.

#### 1.1.5 Capacity Assurance

Section 6 of this SSRAP submittal addresses the need for short-term measures to alleviate the SSO problem. Since it will take several years at least to implement the necessary system improvements, it is important that some solutions be implemented to immediately reduce the frequency and volume of spills. Long term improvements will be identified and developed in a future SSRAP submittal.

#### 1.1.6 Implementation Study and Report

Section 7 of this SSRAP submittal identifies and evaluates options for collaboration between the parties. Since the parties are facing similar, and in many cases the same, requirements imposed by the Order, there are several opportunities to obtain synergies between efforts and pool resources. By collaborating as a group, the parties could, for example, provide mutual aid during response events, more effectively evaluate the collection and conveyance systems, obtain consolidated bids for work at a lower rate than they could get as individual parties, and secure additional funding.

### 1.2 Administrative Order Background

#### 1.2.1 History

This Sewage Spill Reduction Action Plan is the result of a collaborative effort between SASM and its member agencies. The EPA has ordered in *Docket No.: CWA-309(a)-08-030* that these organizations work together to reduce and eliminate collection system sewage spills. This section of the SSRAP briefly outlines the history of events that led to this Order.

SASM and its member agencies have historically had SSOs. **Table 1-1** summarizes the spills between December 2004 and February 2008 that were named in the Order. The 2000 and 2007 National Pollutant Discharge Elimination System (NPDES) permit for SASM prohibits the discharge of wastewater to the waters of the United States.

**Table 1-1: SSOs from Named Sewer System Authorities**

Agency	Number of SSOs	Number of SSOs to Waters of the United States
SASM	4	4
Almonte	16	0
Alto	5	2
Mill Valley	110	25
HVSD	34	N/A <sup>a</sup>
RBSD	48	4
TCSD <sup>b</sup>	28	8

Footnotes:

- a. The Order did not specify how many SSOs reached waters of the United States.
- b. These SSOs are assumed to represent a total number of SSOs that occurred within the TCSD boundary. The majority of the TCSD collection system is not part of SASM.

In August and October of 2007, the EPA conducted inspections of the collection systems owned and operated by SASM and five of its member agencies. The EPA inspected the sixth member agency, Mill Valley, in February 2008. Through these inspections, the EPA determined that the causes of the spills were sewer blockages, primarily from root intrusion and debris, and I/I in the collection systems. I/I occurs when water normally outside of the collection system, such as groundwater and surface water runoff, enters the collection systems. I/I increases peak wet weather flows which can cause overflows at constriction points in the collection system, at pump stations, and at downstream wastewater treatment plants (WWTP). The EPA also found that many of the pipes are aged and deteriorated. These conditions contribute to I/I flows.

Approximately 2.45 million gallons of wastewater bypassed the SASM treatment plant and discharged to Richardson Bay on January 25, 2008. The bypass occurred during wet weather flows, and the EPA found that it was caused “in part, by excessive inflow and infiltration to the member agencies’ collection systems that resulted in peak wet weather flows through the collection systems and to the wastewater treatment plant.” (CWA-309(a)-08-030)

The EPA issued the Order on April 10, 2008 and transmitted a copy of the Order to SASM and the member agencies and the San Francisco RWQCB. The EPA amended the Order on September 2, 2008.

### 1.2.2 Connection Between Order for Compliance and SSRAP

This document has been developed in response to the EPA’s Order for Compliance. The Order outlines a number of components for the SSRAP. The SSRAP generally follows the Order outline but some changes were made to maximize the benefit to the named parties of compiling and documenting the procedures and information for the SSRAP. **Table 1-2** below will facilitate review of the SSRAP by connecting the Order requirements with the SSRAP sections.

Table 1-2: Connection Between Order Requirements and SSRAP Sections

Order Section	Summary of Order Requirement	Corresponding SSRAP Section <sup>c</sup>
<b>Sanitary Sewer Overflow Response Plan (SSORP)</b>		
II.A	Submit SSORP	Appendices B-H
II.A.1	Notification procedures and response time	2.2.1
II.A.2	Containment, termination, recovery, and cleanup procedures	2.2.2
II.A.3	Spill volume estimation procedures	2.2.3
II.A.4	Procedures to secure area and post signs	2.2.4
II.A.5	Sampling and monitoring procedures	2.2.5
II.A.6	Spare parts and emergency equipment	2.2.6
II.A.7	Staffing and contracting requirements	2.2.7
II.B	Recordkeeping procedures	2.2.8
II.C	Notification procedures	2.2.9
II.D	Reporting procedures	2.2.10
<b>Sewer System Cleaning and Root Control Program</b>		
III.A.1	3-year cleaning plan	3.X.1
III.A.1.a	Routine cleaning schedule	3.X.1.1
III.A.1.b	Hot spot information	3.2.1, 3.X.1.2
III.A.1.c	Easement procedures for cleaning and maintaining pipes	3.2.2, 3.2.3, 3.X.1.3
III.A.1.d	Root blockage prevention plan	3.X.1.4
III.A.1.e	Staffing and contracting requirements	3.X.1.5
III.A.2	Annual reporting	Not Included <sup>a</sup>
<b>Maintenance Management System</b>		
III.B.1	MMS description and plan	3.X.2
III.B.2	Link CMMS to GIS	3.X.2
<b>Pump Station Reliability Certification</b>		
III.C.1	Pump station descriptions	Not Included <sup>b</sup>
III.C.2	Pump station certification	Not Included <sup>b</sup>
III.C.3	Pump station plan	Not Included <sup>b</sup>
III.C.4	Facility renovation report	Not Included <sup>b</sup>
<b>Fats, Oils &amp; Grease (FOG) Blockage Control Report</b>		
III.D	FOG report	3.X.3
III.D.1	Grease blockage spill location	3.X.3.1
III.D.2	Sewer cleaning summary	3.X.3.2
III.D.3	Source control programs	3.X.3.3
III.D.4	Description of effectiveness	3.X.3.4
III.D.5	Planned modifications	3.X.3.5
<b>Sewer Pipe and Maintenance Hole Inspection and Condition Assessment</b>		
IV.A.1	Inspection and assessment plan	4.X.2
IV.A.1.a	Inspection methods	4.X.2.1

Order Section	Summary of Order Requirement	Corresponding SSRAP Section <sup>c</sup>
IV.A.1.b	Inspection schedule	4.X.2.4
IV.A.1.c	Evaluation system	4.X.2.2
IV.A.2	Summary of previous inspections	4.X.1
IV.A.3	Annual reporting	Not Included <sup>a</sup>
IV.A.4	Final report	Not Included <sup>b</sup>
<b>Capacity Assessment</b>		
IV.B.1	Flow metering	5.2
IV.B.2	Annual reporting	Not Included <sup>a</sup>
IV.B.3	Flow and capacity report	Not Included <sup>b</sup>
<b>Short-Term Contingency Plan</b>		
V.A	Short-term contingency plan	6.2
V.B	Capacity assurance plan	Not Included <sup>b</sup>
<b>Infrastructure Renewal</b>		
VI.A	Repair, rehabilitation, and replacement plan	Not Included <sup>b</sup>
VI.B	Annual reporting	Not Included <sup>a</sup>
<b>Implementation Study and Report</b>		
VII	Collaboration report	7.2
VII.1	Resource deployment	7.2.2
VII.2	Energy use reduction	7.2.4
VII.3	Assessment coordination	7.2.1
VII.4	Engineering and capacity coordination	7.2.3
VII.5	Capital improvement collaboration	7.2.3
VII.6	Financial planning collaboration	7.2.5

## Footnotes:

- a. To be submitted independently by individual agencies
- b. To be submitted at a later date per the Order schedule
- c. "X" indicates agency-specific subsection

### 1.3 Agency Descriptions

The following descriptions are provided in the Order:

- Almonte Sanitary District operates a sewage collection system that collects sewage from approximately 789 equivalent domicile units (EDUs), servicing a population of approximately 1,478 in southern Marin County. Almonte's collection system includes approximately 5.5 miles of sewage pipes. Sewage collected by Almonte's collection system is conveyed to the sewage collection system operated by Sewerage Agency of Southern Marin (SASM) and thereafter conveyed for treatment at the Sewerage Agency of Southern Marin Wastewater Treatment Plant.
- Alto Sanitary District operates a sewage collection system that collects sewage from approximately 508 EDUs, servicing a population of approximately 1,000 in southern Marin County. Alto's collection system includes approximately six miles of sewage pipes. Sewage collected by Alto's collection system is conveyed to the sewage collection system operated by SASM and thereafter conveyed for treatment at the Sewerage Agency of Southern Marin Wastewater Treatment Plant.

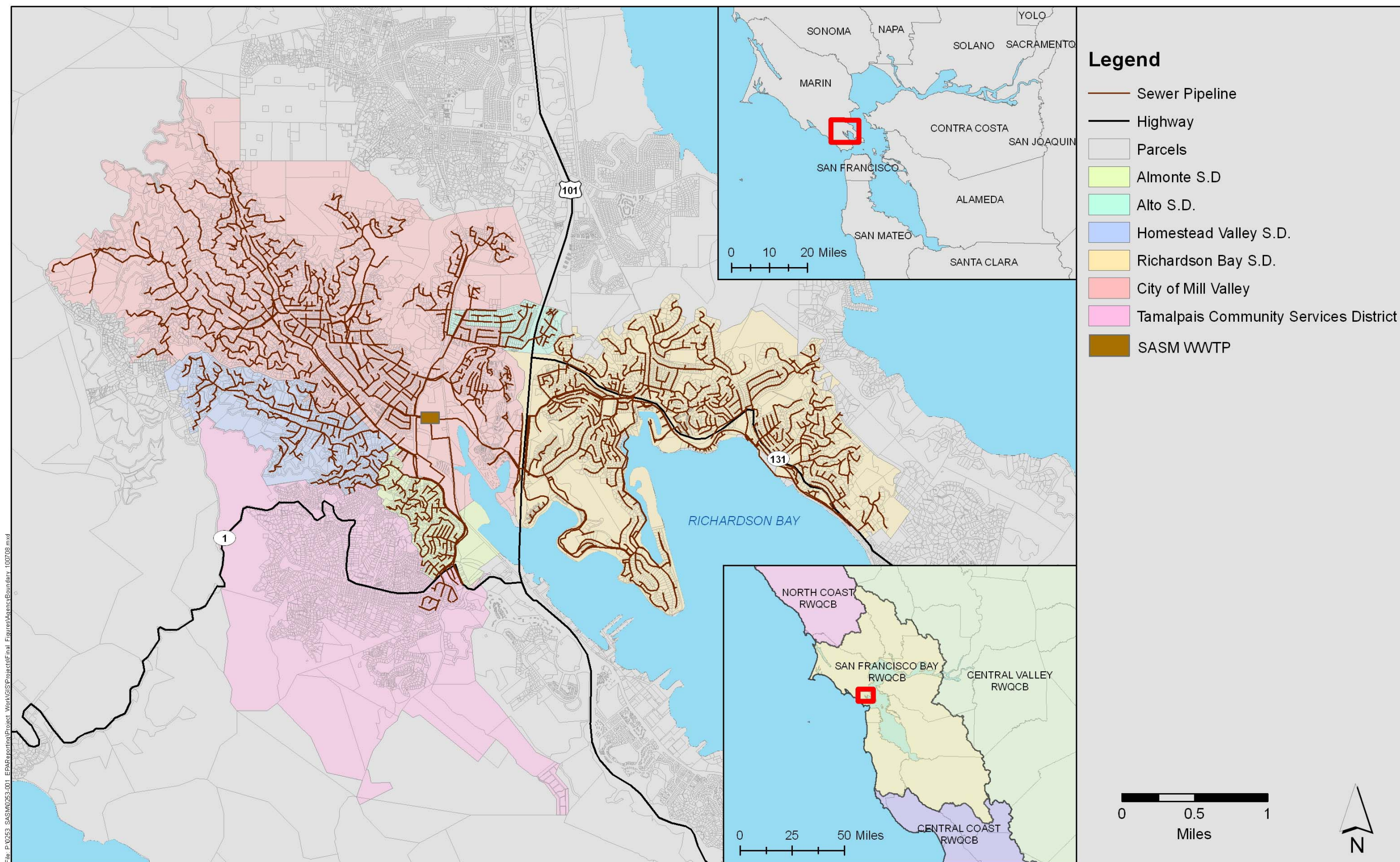
- City of Mill Valley operates a sewage collection system that collects sewage from approximately 7,140 EDUs, servicing a population of approximately 13,600 in southern Marin County. Mill Valley's collection system includes approximately 59 miles of sewage pipes, two pumping stations, and a half mile of force main. Sewage collected by Mill Valley's collection system is conveyed to the sewage collection system operated by SASM and thereafter conveyed for treatment at the Sewerage Agency of Southern Marin Wastewater Treatment Plant.
- Homestead Valley Sanitary District operates a sewage collection system that collects sewage from approximately 1,064 EDUs, servicing a population of approximately 2,354 in southern Marin County. Homestead Valley's collection system includes approximately 11 miles of sewage pipes. Sewage collected by Homestead Valley's collection system is conveyed to the sewage collection system operated by SASM and thereafter conveyed for treatment at the Sewerage Agency of Southern Marin Wastewater Treatment Plant.
- Richardson Bay Sanitary District operates a sewage collection system that collects sewage from approximately 4,664 EDUs, servicing a population of approximately 9,494 in southern Marin County. Richardson Bay's collection system includes approximately 40 miles of sewage pipes, four miles of force mains, 15 pump stations, and eight individual home pump stations. Sewage collected by Richardson Bay's collection system is conveyed to the sewage collection system operated by SASM and thereafter conveyed for treatment at the Sewerage Agency of Southern Marin Wastewater Treatment Plant.
- Tamalpais Community Services District operates a sewerage collection system that collects sewage from approximately 2,560 EDUs, servicing a population of approximately 5,851 in southern Marin County. Tamalpais' collection system includes approximately 27 miles of sewage pipes, less than one mile of force main, and two pump stations. Sewage collected by Tamalpais' collection system, except that from the area known as Kay Park, is pumped to a sewage collection system operated by Sausalito-Marín City Sanitary District and thereafter conveyed for treatment at the Sausalito-Marín City Sanitary District Wastewater Treatment Plant. Sewage from about 140 EDUs in Kay Park flows to the sewage collection system operated by SASM and thereafter conveyed for treatment at the Sewerage Agency of Southern Marin Wastewater Treatment Plant.
- SASM operates a sewage collection system and the wastewater treatment plant known as the Sewerage Agency of Southern Marin Wastewater Treatment Plant. SASM's collection system includes approximately five miles of sewage pipes, ten miles of force mains, and six lift stations. SASM's collection system collects sewage from the Almonte, Alto, Mill Valley, Homestead Valley, Richardson Bay, and a portion of the Tamalpais collection systems. SASM discharges treated wastewater from the Sewerage Agency of Southern Marin Wastewater Treatment Plant to Raccoon Strait in San Francisco Bay.

In the case of TCSD, this SSRAP addresses only the portion of the collections system that is tributary to the SASM WWTP.

**Figure 1-1** shows the location of the agencies in relation to one another and to the San Francisco Bay Area.



Figure 1-1: Regional Map of Named Agencies



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Source: MarinMAP; Sewerage Agency of Southern Marin; Almonte Sanitary District; Alto Sanitary District; City of Mill Valley; Homestead Valley Sanitary District; Richardson Bay Sanitary District; Tamalpais Community Services District



## 1.4 Relationship between Plan and Regulatory Documents

SASM and its member agencies are each responsible for adhering to the requirements of several regulatory agencies as well as their own internal policies and procedures. This SSRAP submittal has been written solely to address the requirements of the EPA Order and is not intended to replace or supersede other policy and procedure documents. Some of the other regulatory documents, such as the Sewer System Management Plans (SSMPs) required by the RWQCB and by the State Water Resources Control Board (SWRCB) under the Statewide General Waste Discharge Requirements (GWDR) for Sanitary Sewer Systems, or the County of Marin Environmental Health Services (EHS) procedures, are directly relevant to the content of this document. In those cases, the content of those documents were used directly or adapted to fit the format of the SSRAP. SASM and its member agencies will incorporate commitments made in the SSRAP as appropriate into other regulatory agency required documents.

## 1.5 Plan Organization

Each of the following sections in the SSRAP submittal generally corresponds to a section or subsection of the Order as described in Table 1-2. A brief introduction in each section expands on the purpose of the section, describes the Order requirements that are addressed in the section, and details any particular methods that were used to develop the information within that section.

Section 2 relies heavily on appendices to meet the requirements of the Order. While most of the procedures are common to all of the SSORPs, it was determined that combining information such as emergency contacts and diagrams could lead to confusion during an emergency response. For this reason, individual, stand-alone SSORPs were created.

Sections 3 and 4 address the Order requirements for each party in a separate sub-section, but also include sections containing general procedures that are common to all agencies. The separate sub-sections are not included as appendices since they do not represent procedures and protocols for emergency situations.

Sections 5 through 7 do not differentiate between the parties within the section as the parties have either decided to approach the response to the Order requirements collaboratively or the section is collaborative in nature.

## Section 2 Sanitary Sewer Overflow Response

### 2.1 Introduction

#### 2.1.1 Purpose

This section and its appendices establish procedures and set standards to minimize the potential impact of sewer overflows to the public and environment and to maintain adequate records for reporting to the appropriate regulatory agencies. Documentation of these procedures and standards can be found in the Sanitary Sewer Overflow Response Plan (SSORP) that has been developed for each named party.

Although the SSORPs are similar in many ways, each agency has different contact names and phone numbers, slightly different procedures, and different system characteristics that would make one consolidated SSORP confusing and difficult for individual agencies to utilize. The SSORPs for each agency can be found in this document's appendices as shown in **Table 2-1** below.

**Table 2-1: Location of the SSORP for Each Agency**

Agency Name	Appendix for SSORP
Sewage Agency of Southern Marin (SASM)	Appendix B
Almonte Sanitary District	Appendix C
Alto Sanitary District	Appendix D
City of Mill Valley	Appendix E
Homestead Valley Sanitary District (HVSD)	Appendix F
Richardson Bay Sanitary District (RBSD)	Appendix G
Tamalpais Community Services District (TCSD)	Appendix H

This section reviews the requirements of the EPA Order and summarizes, in general, where each EPA Order requirement is addressed in these individual SSORPs

For each agency, the individual SSORPs address the requirements of Section II of the EPA Order.

#### 2.1.2 EPA Order Requirements

Section II of the EPA Order includes the following requirements:

- II. *Spill Response, Recordkeeping, Notification and Reporting*
  - A. *Sanitary Sewer Overflow Response Plan: By October 15<sup>th</sup>, 2008, an SSORP shall be submitted to EPA. An SSORP shall describe emergency response and contingency procedures to address SSOs from its collection system, including measures for containing and recovering spilled sewage, establishment of interim system operations, and timely repair and restoration of normal operations. Each agency shall ensure that agency staff and responders are adequately trained to perform the procedure outlined in the SSO response plan. The plan shall include:*
    - i. *Procedures to notify the responders during normal business hours and after business hours. A responder should be at the SSO spill location and initiating response activities within 60 minutes after the agency becomes aware of the spill. If the responder cannot be at the spill location within 60 minutes, the agency shall report the late response as part of the quarterly spill report required. The agency will include in the quarterly spill report a description of*

- all late responses, reasons for each late response, and steps that will be taken to improve the response time.*
- ii. Procedures to ensure containment, termination, maximum recovery, and cleanup of spilled sewage. These procedures shall prevent spills from reaching storm drains and surface water, and mitigate the impact of spills that reach storm drains and surface water.*
  - iii. Procedure to estimate volume. The procedures should include more than one estimation method that can be used for different spill scenarios.*
  - iv. Procedures to secure the area surrounding a spill and post warning signs as necessary in coordination with the County of Marin's Department of Health and Human Services;*
  - v. Procedures to sample and monitor surface waters following spills.*
  - vi. A list of necessary spare parts and emergency equipment to ensure adequate response time and maximum recovery of spilled sewage.*
  - vii. A description of staffing needs required to respond to SSOs and whether staffing duties will be carried out by agency staff, staff from other agencies, or private contractor(s). To the extent that any SSO response duties will be carried out by private contractor(s), the plan shall describe the contractor and include copies of the contracts obligating the contractor(s) to fulfill the requirements of the SSO response plan implemented pursuant to this Order.*
- B. Recordkeeping: The response plan developed shall include procedures for agency staff or its contractors to maintain records of spill incidents, including field reports that provide adequate information to meet reporting requirements to regulatory agencies, and procedures to link these records to the Maintenance Management System.*
- C. Notification: The response plan developed shall include procedures for notifying the public, including schools and recreational clubs, which may be affected by the spill. The plan should include procedures for advising the public to avoid contact and to take steps, as appropriate, in cases of contact with spilled sewage. For spills in homes and businesses, the plan should include procedures for cleaning the spill area. The plan shall identify the agency staff person(s) responsible for public notification.*
- D. Reporting: The response plan shall include procedures for reporting spills, as required, to the appropriate regulatory agencies, including the Regional Board, State Water Resources Control Board, the State of California's Office of Emergency Services, and the County of Marin's Department of Health and Human Services. The plan shall identify the agency staff person(s) responsible for reporting sewage spills.*

## **2.2 Key Elements of the Sanitary Sewer Overflow Response Plans**

### **2.2.1 Response Procedures**

Each agency has procedures to respond to reports of an SSO in their agency's boundaries. This includes several items such as the phone number for calls from customers and contact information for responders that the agency has selected. To address these differences, each agency's SSORP has response procedures tailored specifically for that agency. These tailored response procedures are included as Chapter 2 (Notification Procedures) and Chapter 3 (Response Procedures) of each individual agency's SSORP.

### 2.2.2 Mitigation Requirements

Mitigation requirements are included in Chapter 3, Section 3.6 (Containment), and Chapter 4 (Recovery and Clean Up) of each individual agency's SSORP.

### 2.2.3 Estimating Spill Volume

Procedures to estimate spill volume have been addressed in Chapter 4, Section 4.4 of each individual agency's SSORP.

### 2.2.4 Securing the Area

Securing the area after an SSO is an important activity designed to protect public health and safety. The procedures for securing an area after an SSO are included in Chapter 3, Section 3.7 and in Chapter 5 of each individual agency's SSORP.

### 2.2.5 Sampling and Monitoring Surface Water

When an SSO reaches a water body, water quality samples will be taken. Procedures for taking samples and performing laboratory testing on the samples have been included in Chapter 4, Section 4.3 of each individual agency's SSORP.

### 2.2.6 Spare Parts and Emergency Equipment List

Each agency or the agency's contractor will maintain emergency equipment and spare parts to support response to an SSO. The list of emergency equipment and spare parts for each agency is discussed in Chapter 7 of each individual agency's SSORP.

### 2.2.7 Description of Staffing Needs

Staffing needs for the response to an SSO are not discussed in each individual SSORPs. The staffing required to respond to an SSO requires responder(s) to be available to respond during work hours and after normal work hours. **Table 2-2** summarizes the organization that will provide the responder(s) needed during work hours and after work hours for each agency.

**Table 2-2: Organizations That Provide SSO Response Staffing**

Agency Name	Organization that Provides SSO Response Staff During Normal Work Hours	Organization that Provides SSO Response Staff Outside Normal Work Hours
SASM	Roto-Rooter	Roto-Rooter
Almonte Sanitary District	Roto-Rooter	Roto-Rooter
Alto Sanitary District	Roto-Rooter	Roto-Rooter
City of Mill Valley	City of Mill Valley or Roto-Rooter	City of Mill Valley or Roto-Rooter
HVSD	Roto-Rooter	Roto-Rooter
RBSD	RBSD or Roto-Rooter	RBSD or Roto-Rooter
TCSD	TCSD or Roto-Rooter	TCSD or Roto-Rooter

Some agencies may use private contractors to respond to SSOs. A formal contract is not in place at this time with any contractor to perform these services. The agencies wished to include the procedures and standards developed for and included in the SSORPs in the contract for services. The future contract or contracts will reflect the procedures in the SSORPs. A copy of the contract between each agency and their SSO response contractor(s) will be provided under separate cover by April 15, 2009.

**2.2.8 Recordkeeping**

The recordkeeping procedures used to document and report SSOs are detailed in Chapter 6 of each individual agency's SSORP. The Order requires each agency to provide procedures to link SSO records to the maintenance management system. A plan for the implementation of a new maintenance management system or for updates to an existing maintenance management system, including a plan for development of the procedures that will be utilized to link SSO records to each agency's maintenance management system, will be provided in the April 15, 2009 submittal to the EPA.

**2.2.9 Notification**

Procedures used to keep the public from coming into contact with sewage and for notifying the public of an SSO are covered in Chapter 3, Section 3.7 and Chapter 5 of each agency's SSORP. Chapter 5 of each SSORP also identifies the agency's point of contact for public notification.

Section II.C of the Order also requested procedures for cleaning the spill area for spills in homes and businesses. This topic is covered in Chapter 4 of each agency's SSORP.

**2.2.10 Reporting**

The procedures for reporting SSOs are covered in Chapter 6 of each agency's SSORP. This same chapter also identifies the agency's representative responsible for reporting sewage spills.