

## **Section VI – Overflow Emergency Response Plan**

### **Background and Regulatory Requirements**

The Statewide WDRs governing sanitary sewers specify the development and implementation of an overflow emergency response plan as an element of each Wastewater Collection Agency's Sanitary Sewer Management Plan (SSMP). This element identifies the agency's practices to protect public health and the environment in the event of a spill.

### **Leucadia Wastewater District Actions**

The District has developed and implemented an Overflow Emergency Response Plan which standardizes the District's response actions to the report of a possible sanitary sewer overflow or spill, identifies the safety precautions and industry practices to ensure public and environmental health and safety, and identifies the internal and external notification and reporting requirements. Key required components of this SSMP element are discussed in the following sections.

An essential component of the Overflow Emergency Response Plan is the identification of the proper notification procedures to the appropriate parties. This includes regulatory agencies and other external agencies, as well as District management. A list of emergency contractors is also provided. Pages 1 through 3 of the plan provide the specific procedures for who should be contacted regarding the spill, starting with the person who actually receives the initial reporting call. One of the first steps required of the person receiving the call is to notify the Field Services Supervisor and/or Manager who has the responsibility, as the plan specifies, to make all required notifications within the required timeframes. The specific officials who are to be notified are listed in Attachment H to the plan. The plan also identifies procedures to address emergency operations, such as traffic and crowd control, while adhering to District safety procedures.

In addition to general spill response practices, the plan identifies specific additional steps which should be followed for a particular spill cause. For example, if the spill is due to the loss of power at a pump station, the first responder is required to immediately request a portable emergency generator, even though six of the eleven stations have one onsite. The District has specific spill response procedure for pump station problems, including the procedure for power loss at any of the District pump stations. The District maintains a separate spill response procedure if the spill occurs within a private residence or business. This response procedure would be utilized parallel to the Overflow Emergency Response Plan where applicable.

In the event of a spill, the plan identifies the procedures to contain and prevent any discharge to surface waters and include:

- First responders proceeding to spill location in Vector truck
- First responders equipped to cover storm drain
- First responders trained in pump station operations

The plan also directs first responders to first make all practical efforts to contain the spill, to correct the cause of the spill, and evaluate the feasibility of secondary containment or collection. These containment steps help to minimize any impact to the environment as a result of the spill.

Additionally, to further minimize or correct any adverse impact, the plan procedures specify that any washwater, debris, and contaminated soil are collected and properly disposed of. Finally, the Field Service Supervisor/Manager prepares and carries out, in concert with the appropriate agencies, a written plan and protocol for enhanced sampling, if necessary, to determine the environmental impact and remediation of the spill. For public health and safety, this step also includes working with regulatory agencies for posting of signs, as necessary (e.g., at beach or lagoon). The District maintains a standard posting and sampling procedure which would be modified to incorporate the concerns of any regulatory authorities as necessary as part of the spill response.

To ensure that all appropriate personnel are adequately trained on the spill response plan procedures, the plan discusses how new employees are made aware of the response plan and identifies the Field Services Supervisor and/or Manager's responsibilities for regular training and hands-on spill response drills. The District's SCADA response procedure details how staff should respond to SCADA alarms.

Prevention of spills is paramount to the District. As part of the new hire process, all field staff are provided with the standard list of duties which promote safety and emphasize the importance of ensuring that District facilities and infrastructure remain or are returned to operational status as quickly as possible with emphasis on ensuring a prompt and capable response to trouble reports and system alarm conditions.

#### **District Documents Included With This Section**

- SOP – Overflow Emergency Response Plan
- SOP – Pump Station Alarm Response
- SOP – Posting and Sampling Procedure
- SOP – SCADA Alarms and Alpha Numeric Pages
- SOP – Standby Duty Operator (On Call)