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SUBJECT: PROCEDURE FOR EMERGENCY RESPONSE TO SANITARY SEWAGE OVERFLOWS (SSOs)

1.0 PURPOSE

The procedure for responding to sewage overflow was developed and instituted to:

- a. Standardize the proper method used by Field Services staff (FS staff) when responding to a report of a possible sewage overflow.
- b. Ensure that all safety precautions and industry practices are consistently followed to minimize the impact of a sewage spill to public health, worker safety, and the environment.
- c. Provide notification to all appropriate external agencies and LWD management of the SSO in accordance with 40 CFR 122.41; State Water Resources Control Board (SWRCB) Order No. 2006-03, General Waste Discharge Requirements (GWDR), dated May 3, 2006; SWRCB Order No. WQ 2013-0058-EXEC, effective July 26, 2013; and San Diego Regional Water Quality Control Board (SDRWQCB) Waste Discharge Requirements Order R9-2007-005, dated Feb 14, 2007.

2.0 SAFETY

Nothing in these procedures supersedes, or in any other way, relaxes LWD Safety Procedures regarding Traffic Safety, Electrical Safety, Lockout/Tagout, Confined Space, Infectous Disease, or Illness and Injury Prevention.

3.0 PROCEDURE

- A. <u>Any LWD employee (including answering service staff)</u>, being notified of a "sewage spill or overflow", will carry-out the following duties:
 - 1) politely interact with the caller, obtain all relevant information and fill out a "Work Order/Service Request" {Attachment (a)}. (Note time spill is reported.)
 - 2) utilizing your cell phone immediately notify the Field Service Supervisor (FS Sup) and/or Field Service Superintendent (FSS) or the Stand-By Duty Operator that sewage overflow/spill has been reported. If sewer overflow is backing up into a building or residence, Administrative Services Manager (ASM) must also be notified. Use LWD Emergency phone card {Attachment (b)} or Frequently Called Numbers {Attachment (c)}. [Note time of notification was made.]

B. Stand By Duty Operator (staff member responding to spill)

 Quickly, but <u>safely</u>, proceed to the location of the reported spill in <u>one of the</u> <u>Vactors</u>.

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- 2) Upon arrival, immediately investigate and assess the situation, especially for any safety hazards. Determine if there is any exceptional or additional measures required to protect the public, such as traffic control or crowd control. As practical and within safety limits consider the use of barriers, taping of the area, or requesting assistance from law enforcement officials.
- Determine the type of water overflowing/spilling. <u>Make a rapid estimate of spill</u> <u>flowrate or its volume, the source of the spill, and its destination.</u> {see photos of various spill volumes, Attachment (d)}.
- 4) Note time of arrival on Emergency Action Report {Attachment (e)}.
- 5) Immediately make all practical efforts to contain the overflowing sewage and then, as rapidly as possible, <u>correct the cause of the spill</u>. [Note times spill is contained and/or stoppage corrected on Sewer Spill Data Sheet {Attachment (f)}].

Note: If any aspect of the spill (e.g., spill greater than 1000 gals, spill location, spill destination, damage to private property, media interest, injury, etc.) is "exceptional" or there is any doubt regarding the spill, LWD staff member is to immediately notify the FS Sup, FSS, Technical Services Manager (TSM), or General Manager (GM) at their offices or homes.

(If spill is due to power outage at a pump station, notify FS Sup immediately. If the station has an emergency generator, confirm that it is operating. If the power outage occurs at a station without an emergency generator, request a portable emergency generator be brought to the affected pump station. See also the Standard Operating Procedure - Pump Station Alarm Response)

(If the source of the spill is a forcemain, notify the FS Sup Immediately so that commercial pumper trucks can be dispatched without delay.)

(Spill Response includes deploying spill kit barriers across the entrance of nearby storm drains, verifying proper lift station operation or securing lift station operation as required, and checking manholes for stoppages caused by grease or other debris.)

(Note: If circumstances preclude spill containment, the responding LWD staff member will, as soon as practical, determine the ultimate destination of the spill and evaluate the feasibility of secondary containment or collection.)

6) Keep FS Sup informed of all aspects of the Spill (time of arrival on scene, estimated volume or amount of spill, all requirements for extra staff or special equipment, with periodic updates/re-assessments, and the cause of the spill,

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including the determination if it is a private lateral spill and the property owner's responsibility.)

- 7) Record the various times of events and details of the spill response on Sewer Spill Data Sheet. {Attachment (f)}. Use handheld GPS device to determine latitude and longitude of spill location and spill destination, if this location is substantially different (over 1000 yards away).
- 8) If required, assist pumper truck operator in returning all collected wastewater to sewer collection system.
- 9) Assist with any and all repair/remediation efforts directed by FSS and/or FS Sup.
- 10) Review the Emergency Action Report sheet {Attachment (e)} and the Sewer Spill Data Sheet {Attachment (f)}, completing all sections with the required data.
- 11) Take photographs, if possible, to record spill size, spill damage, and response.
- 12) As soon as practical after the spill/overflow has been corrected/cleared, wash and/or remediate all areas affected by the spill. Wash water and other debris, as well as contaminated soil should be collected and properly disposed of.
- 13) SSO Surface Water Remediation Assessment Process for an SSO of 1,000 gallons or more that reach surface waters. Two possible remediation strategies are:

a. Block and Divert Flow: The block and divert remediation strategy involves installing a temporary physical dam (e.g. sandbags) in an isolated surface water such as a creek area to block flow and then divert blocked flow with pumps to nearby sanitary sewer.

b. Natural Attenunation: The natural attenuation remediation strategy relies on natural process such as ultraviolet light disinfection from sunlight, biological uptake and tidal mixing to clean up or attenuate pollution in soil and waterbodies.

See Also Sanitarty Sewer Overflow Remediation Protocol

C. Field Services Supervisor and Field Services Superintendent

- Will dispatch additional assistance as required/requested by responding LWD Staff. Will request assistance from list of emergency contractors as necessary. {see Attachment (g)}
- 2) Will make all required telephonic notifications to the Regional Water Quality Control Board, SD County's Office of Environmental Health, and the Office of Emergency Services (OES) within two hours for any spill reaching a storm drain, drainage channel, or surface waters. {see Attachment (f), Attachment (h), and Attachment (i)}
- 3) Based upon size and location of sewer spill, will coordinate with District Engineer, RWQCB, Environmental Health, and Fish and Game to determine number, locations, frequency, and type of analyses for the samples required to determine environmental impact of spill and prepare and carry out a written plan and

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protocol as soon as practical but within 1st 24 hours. District Engineer will make recommendations as soon as possible to incorporate additional resources such as an environmental scientist or biologist as necessary. Note: If spill is greater than 50,000 gallons the SSO Water Quality Monitoring Program must be implemented {see Attachment (j)}.

- 4) Will conduct an immediate investigation into the spill, including a review of the affected sewer line's preventative maintenance history within 24 hours using Spill Review Checklist {Attachment (k)}.
- 5) After investigation is completed and properly documented, a narrative report will be submitted to the GM, via the TSM.
- 6) Will conduct a spill response debriefing.
- 7) Will ensure completion of any requirements of regulatory agencies as soon as can be <u>safely</u> carried out (e.g., <u>posting</u> of affected areas, sampling, soil remediation or capping, environmental mitigation, etc.).{see Attachment (i) and Attachment (j)]
- 8) Will prepare and/or review all follow up documentation for inclusion in the GWDRs required SSO database, California Integrated Water Quality System (CIWQS) within twenty-four hours.{see Attachment (i, j, and k}

Note: Procedures for Beach Posting is provided separately.

4.0 TRAINING

A. LWD employees:

- 1) Will be issued a copy of this procedure and its attachments as part of their "new hire" orientation.
- 2) Will become familiar with the procedure and the duties required during a Spill Response.
- 3) Will attend Spill Response Training annually as directed by the FSS

B. Field Services Superintendent and/or Supervisor

- 1) Will provide both regular training (on-site) and drills (simulated and "Hands On") on spill response annually as well as provide the opportunity to attend offsite training.
- 2) Will review procedures annually to ensure compliance with all required regulations.
- 3) Will routinely monitor and, otherwise quality assure, that emergency response equipment and supplies are maintained in a high degree of readiness.
- 4) Will conduct annual review of these procedures as well as LWD's collection system and the storm drain system within LWD service area to determine in

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advance any probable locations for sewage spills and the deployment of secondary containment. These locations will be included in Emergency Overflow Response Plan Training.

5) Will review spill investigation and implement any required improvements to this procedure.

5.0 PREPARATION

A. Field Services Supervisor

- 1) Will periodically spot check that Vactors and OnCall Vehicle have all required materials to properly respond to and contain a sanitary sewer overflow. This will include at a minimum:
 - a. map books, Toughbook laptop and laptop computer
 - b. tarps
 - c. shovel
 - d. disposable camera/digital camera
 - e. hand-held GPS device (with spare batteries)
 - f. applicable forms (complete OERP) and copies of Ordinance 128
 - g. Operators assigned an operable cell phone with important phone numbers preprogrammed in memory
 - h. materials and supplies required to properly post signs warning of water contamination
 - i. sample bottles and chain of custody forms to conduct water sampling

B. Stand By Duty Operator

Preparation for Sanitary Sewer Overflows is part of the Standard Operating Procedure for Stand By Duty Operators. See the SOP for specific requirements.

ATTACHMENTS

The list of attachments to this plan are as follows:

- a. Work Order/Service Request
- b. Employee Phone Card
- c. List of Frequently Called Numbers
- d. Spill Volume Photos
- e. Emergency Action Report
- f. Sewer Spill Data Sheet
- g. Emergency Contractors Contact List
- h. SDRWQCB Flow Chart
- i. SOP Reporting Sanitary Sewer Overflows
- j. SOP Posting and Sampling (includes SSO Water Quality Monitoring Program)

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k. Spill Review Checklist