CHAPTER 9 – OVERFLOW EMERGENCY RESPONSE PLAN REQUIREMENTS

As part of the Wastewater Master Plan Update, IEC reviewed the City's existing Sewer Overflow Emergency Response Plan and associated procedures and identified suggested modifications and/or improvements. The suggested modifications to the existing Emergency Response Plan are in accordance the terms of the State of California Water Resources Control Board (SWRCB), Order No. 2006-0003, and a General Waste Discharge Requirement (WDR), also referred to as the Sewer System Management Plan (SSMP). As part of this task, IEC identified those measures still necessary to protect public health and/or the environment. Specifically, the Overflow Emergency Response Program must contain proper notification procedures, a sanitary sewer overflow (SSO) response program, as well as internal training requirements. While the City's Overflow Emergency Response Program is currently sufficient to satisfy the requirements of the SSMP, IEC has identified suggested improvements.

Additionally, in order to comply with Order No. R9-2007-0005, as adopted by the San Diego Regional Water Quality Control Board, IEC has recommended the inclusion of language regarding reporting of all SSO's in accordance with the order.

9.1 OVERFLOW EMERGENCY RESPONSE PLAN REQUIREMENTS

In order to comply with Section D, 13 (vi) Overflow Emergency Response Plan of SWRCB Order No. 2006-0003, the City's Overflow Emergency Response Plan must include the following:

a) Proper notification procedures so that primary responders and regulatory agencies are informed of all SSOs in a timely manner;
b) A program to ensure an appropriate response to all overflows;
c) Procedures which ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the Monitoring and Reporting Program (MRP). All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Boards WDR's or National Pollution Discharge Elimination System (NPDES) 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, such as traffic and crowd control and other necessary response activities; and
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.

Additionally, the City must identify the responsible representative for the City, as described in Section J of the State of California Water Resources Control Board (SWRCB) Order No. 2006-0003, which states:

1) All applications, reports, or information shall be signed and certified as follows:
    i. All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.)
    ii. An individual is a duly authorized representative only if:
        (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and

(b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

Further, in order to comply with the additional notification requirements outlined in SWRCB Order No. WQ-2008-0002-EXEC the City's Overflow Emergency Response Plan must include the following:

(1) For any discharges of sewage that results in a discharge to a drainage channel or a surface water, the City shall, as soon as possible, but not later then two (2) hours after becoming aware of the discharge, notify the State Office of Emergency Services, the local health officer or directors of environmental health with jurisdiction over affected water bodies, and the San Diego Regional Water Quality Control Board.

(2) As soon as possible, but no later then twenty-four (24) hours after becoming aware of a discharge to a drainage channel or a surface water, the City shall submit to the San Diego Regional Water Quality Control Board a certification that the State Office of Emergency Services and the local health officer or directors of environmental health with jurisdiction over the affected water bodies were notified of the discharge.

9.2 RECOMMENDATIONS

While the City's Overflow Emergency Response Program is currently sufficient to satisfy the requirements of Order No. 2006-0003, IEC has identified suggested improvements. IEC recommends the inclusion of a section on notification. This "Notification" section would include the procedures for notifying the proper authorities in the event of any SSO as well as an Emergency Telephone lists name and contact information. For consistency, any mention of notification in the existing Response Plan should reference this section. The following language is suggested for this section:

> "In the event of a sewer overflow any employee observing an overflow shall contact Public Works and provide a verbal report. The person receiving the report shall notify the Street and Wastewater Supervisor, or the next higher classification. In the event of a sewer spill after hours contact police dispatcher or standby crew. Contacts can be made as follows.
>
> **DURING NORMAL WORKING HOURS**
> PUBLIC WORKS OPERATIONS
> DISPATCH (619) 397-6000
>
> WASTEWATER SUPERVISOR
> STEVE PADILLA
> OFFICE (619)397-6020
> MOBILE (619) 616-1460
>
> NELSON RIVERA
> OFFICE (619) 397-6039
> MOBILE (619) 921-9602
>
> RUDY CANCIO
> OFFICE (619) 397-6026
> MOBILE (619) 540-5249
>
> JOSEPH BURGOS
> OFFICE (619) 397-6031
> MOBILE (619) 921-7011
>
> MARK SANCHEZ
> OFFICE (619) 397-6025
> MOBILE (619) 616-1455

AFTER NORMAL WORKING HOURS, WEEKENDS OR HOLIDAYS
CHULA VISTA POLICE DEPARTMENT
EMERGENCY DISPATCH (619) 397-5151
WASTEWATER STANDBY (619) 921-5350

OTHER CONTACTS:
WASTEWATER COLLECTION MANAGER
DAVID MC ROBERTS
OFFICE (619) 397-6009
MOBILE (619) 921-7009

ASSISTANT PUBLIC WORKS DIRECTOR
IRACSEMA QUILANTAN
OFFICE (619) 397-6066
MOBILE (619) 495-9290

PUBLIC WORKS DIRECTOR/CITY ENGINEER
RICHARD HOPKINS
OFFICE (619) 409-5873
MOBILE (619) 921-6984

In order to comply with Order No. R9-2007-0005, as adopted by the San Diego Regional Water Quality Control Board, IEC has recommended the inclusion of a section regarding reporting all SSO's in accordance with the order. This "Reporting" section should identify the responsible representative for the City, as described in J of the State of California Water Resources Control Board (SWRCB) Order No. 2006-0003. For consistency, any mention of reporting in the existing Response Plan should reference this section. The following language is suggested for this section:

"Any employee observing or becoming aware of an overflow shall contact public works and provide a verbal report of the incident. The person receiving the notification of the overflow shall have the responsibility to notify the appropriate personnel. Notification shall be to the sewer supervisor who shall dispatch the proper personnel. In a case where the supervisor is not available, notification shall be to the next higher classification.

1. Complete all required reports with pertinent details, including estimates of overflow volume. Turn in reports and photos to Street and Wastewater Supervisor by the start of the next workday.
2. The Director of Public Works or his/her duly authorized representative is the responsible representative for the City, as described in Section J of the State of California Water Resources Control Board (SWRCB) Order No. 2006-0003, entitled "Statewide General Waste Discharge Requirements for Sanitary Sewer System."
3. All SSOs must be reported as soon as: (1) the City has knowledge of the discharge, (2) reporting is possible, and (3) reporting can be provided without substantially impeding cleanup or other emergency measures. Initial reporting of SSOs must be reported to the Online SSO System as soon as possible but no later than 3 business days after the City is made aware of the SSO. Minimum information that must be contained in the 3-day report must include all information identified in Section D (ix), Monitoring and Reporting Program, of SWRCB Order No. 2006-0003. A final certified report must be completed through the Online SSO System, within 15 calendar days of the conclusion of SSO response and remediation.
4. For any discharges of sewage that result in a discharge to a drainage channel or a surface water, the spill shall, as soon as possible but not later than two (2) hours

after becoming aware of the discharge, notify the State Office of Emergency Services, the local health officer or directors of environmental health with jurisdiction over affected water bodies, and the San Diego Regional Water Quality Control Board.

OFFICE OF EMERGENCY SERVICES
(800) 852-7550
(916) 262-1677 FAX

SAN DIEGO COUNTY
DEPARTMENT OF HEALTH SERVICES
PROP. 65 COORDINATOR (Clay Clifton)
P.O. BOX 85261
SAN DIEGO, CA 92186-5261
Office: (858) 495-5579
After hours: (619) 338-2222
Fax: (619) 338-2377

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION
9174 SKY PARK COURT, SUITE 100
SAN DIEGO, CA 92123
Office: (858) 627-3930
Fax: (858) 571-6972

CITY OF SAN DIEGO
PUBLIC UTILITIES
202 C ST.
SAN DIEGO, CA 92101
(619)515-3525

5. Initial reporting of SSOs that do not discharge to a drainage channel or surface water must be reported to the San Diego Water Quality Control Board within 24 hours after the City becomes aware of the SSO, notification is possible, and notification can be provided without substantially impeding cleanup or other emergency measures. Minimum information that must be contained in the 24-hour report must include all information identified in section C.2 of R9-2007-0005.
6. In the event of a private lateral sewer discharge, the City will provide notification of the discharge to the San Diego Regional Water Quality Control Board by phone, email, or fax within 24 hours after the City becomes aware of the SSO, notification is possible, and notification can be provided without substantially impeding cleanup or other emergency measures. The City will also report the private lateral discharge to the State Board Online SSO Database within 30 days after the end of the calendar month in which the Lateral Sewage Discharge occurs. The City identifies the sewage discharge as occurring and caused by a private lateral, and the responsible party (other than the City) is identified, if known.
7. All overflows greater than 50 gallons or less than 50 gallons if occurring within 50 feet of human habitation or poses a threat to public health and/or the environment, are to be reported to the proper regulatory agencies.
8. A copy of this report shall also be submitted within 30 days to the San Diego Unified Port District if materials are released into tideland areas.

SAN DIEGO UNIFIED PORT DISTRICT
P.0. BOX 488

SAN DIEGO, CA. 92112
ATTENTION: ENVIRONMENTAL MANAGEMENT"

It is also recommended that the City include some language concerning posting requirements (perhaps in the "Traffic and Crowd Control" section) such as the following:

> "Once it has been established that the public health may be at risk, it becomes necessary to post sign warning of contamination in appropriate locations. Environmental Health Services will direct the extent of the posting and when the signs are to be removed. It is the responsibility of the discharge to post the spin and remove signs when the event has been determined to be over."

The suggested modifications to the existing Emergency Response Plan are in accordance the terms of the State of California Water Resources Control Board (SWRCB), Order No. 2006-0003 and Order No. R9-2007-0005. The appropriate changes to contact information, etc. should be made to reflect the City's response procedures and staff.