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New SSO Monitoring and Reporting Program

BACWA Collection Systems Committee

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Brief History

Date	Action
May 2006	SSS WDR adopted by State Water Board
Feb 2008	Executive Order Amendment requires 2-hour reporting
Early 2009	State Water Board staff wanted to “improve performance”
	Cal OES was complaining of non-emergency calls
2009 – Early 2012	State Water Board initiated changes to WDR; 1,100 comments
Aug 2012	Workshops on first draft of revised MRP
	<i>Comments, comments and more comments + dialog with State Water Board staff</i>
Jan 2013	Second draft released
	<i>Comments, comments and more comments + dialog with State Water Board staff</i>
July 2013	Revised MRP released
Sep 9, 2013	Revised MRP became fully effective

New 2-Hour Notification

Before	Now
<i>Notify Cal OES within 2 hours:</i>	
All SSOs to drainage channel or surface water	<p>SSOs \geq 1,000 gallons to drainage channel or surface water</p> <p><i>Also note:</i></p> <ol style="list-style-type: none">(1) Notify Cal OES no later than two (2) hours <u>after</u> (A) the enrollee has knowledge of the discharge, (B) notification is possible, and (C) notification can be provided without substantially impeding cleanup or other emergency measures(2) Note the list of what Cal OES <i>might</i> ask when you call.(3) If substantial changes in information, update Cal OES

New SSO Categories

Category #	Before	Now
Category 1	Any SSO to drainage channel or surface water, or SSOs $\geq 1,000$ gallons not to surface water, even if fully captured	Any SSO to surface water or drainage channel, regardless of size, except when fully captured
Category 2	All other SSOs	SSOs $\geq 1,000$ gallons that do not reach surface water or drainage channel
Category 3	--	SSOs $< 1,000$ gallons that do not reach surface water or drainage channel

New Water Quality Sampling

Before	Now
No requirement to sample any SSOs	Sample SSOs \geq 50,000 gallons within 48 hours of “becoming aware of the SSO”
	Prepare Water Quality Monitoring Plan

Water Quality Monitoring Plan

Required Elements:

- Sampling protocols
- Information about how agency will account for spill travel time
- Decide appropriate bacteria indicator - look at applicable NPDES permit for your agency, or your regional agency (if satellite). (NPDES permit is based on Basin Plan but more specific to your agency.)
- Indicate that bacteria indicator and ammonia will be sampled (minimum)
- Indicate that samples will be analyzed by accredited or certified laboratory
- Indicate how sampling equipment/instruments/supplies will be maintained and/or calibrated



New Technical Report

Before	Now
No requirement for Technical Report	Prepare Technical Report for SSOs $\geq 50,000$ gallons within 45 calendar days of SSO end date

Technical Report

Required Elements:

1. Causes and Circumstances of the SSO
 - a. Explanation for how and when SSO was discovered
 - b. Diagram showing the SSO failure point, appearance point(s), and final destination(s)
 - c. Description of method and data used to calculate SSO volume, including volume recovered
 - d. Description of cause(s) of SSO
 - e. Copies of original field crew records used to document SSO
 - f. Historical maintenance records for failure location



Technical Report

Required Elements (continued):

2. Enrollee's Response to SSO

- a. Narrative description of chronological actions taken to end SSO
- 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

Technical Report

Required Elements (continued):

3. Water Quality Monitoring

- a. Description of water quality sampling activities conducted including analytical results and evaluation of the results
- b. Detailed location map illustrating water quality sampling points

Reporting to CIWQS

Highlights:

- Note this is a completely different process than the 2-hour notification to Cal OES.
- If multiple appearance points for SSO from sewer system, complete one SSO report in CIWQS.
- Note new list of items to be reported for the three different categories.
- Category 1 and 2 – Submit draft within 3 business days of “becoming aware of SSO”, final certified report within 15 calendar days of end date.
- Category 3 – Submit certified report within 30 days following the month when the SSO occurs.



Reporting to CIWQS

(continued)

- No spill reports: Can report within 30 days following the month when the SSO occurs OR within 30 days following the quarter when the SSO occurs.
- If CIWQS is down, fax information to Regional Water Board at (510) 622-2460, within same deadlines. Enter into CIWQS when it becomes available.
- CIWQS Report Amendments – Now, you only have 120 days to change an SSO report, however if you request more time by providing justification for why the additional information was not available prior to the end of the 120 days to the State Water Board SSO Reduction Program staff.
- Collection System Questionnaire – Recertify in CIWQS at least every 12 months.

Internal Record Keeping

Highlights:

- Note that revised MRP language says to keep internal “records to document compliance with **all** provisions of the SSS WDRs and associated MRP.” (yellow highlight added)
- Complaint records need to include, among other things, whether or not the complainant or informant reporting the potential SSO knows if the SSO has reached surface waters, drainage channels or storm drains.”
- Records documenting steps/remedial actions to stop SSO
- Records indicating how SSO volume was determined
- Records documenting **all** changes made to the SSMP since its last certification – indicate change, who authorized, and attach to SSMP
- Electronic monitoring records for documenting SSO events and/or estimating the SSO volume discharged including for example: SCADA data; alarm information; or flow rate, level, or volume monitoring data



SSMP Availability

Two options for making SSMP available to State Water Board:

- Provide electronic copy of SSMP, critical supporting documents referenced in the SSMP, and proof of local governing board approval of SSMP to State Water Board, within 30 days of that approval and within 30 days of any subsequent SSMP re-certifications, to the following mailing address:

State Water Resources Control Board
Division of Water Quality
Attn: SSO Program Manager
1001 I Street, 15th Floor, Sacramento, CA 95814

- Provide web site address to CIWQS Online SSO Database where a downloadable copy of the enrollee's approved SSMP, critical supporting documents referenced in the SSMP, and proof of local governing board approval of the SSMP is posted.

Next Steps

We talked about some highlights of the revised MRP today, but please read the revised MRP and update your SSMP (if not done already), because there are many little details to be aware of.

