

SSS WDRs Compliance and Enforcement Update



State Water Board
Office of Enforcement
Special Investigations Unit

BACWA
July 2016

OVERVIEW

1. Permit Compliance and Expectations
2. Example SSO Reduction Practices
3. Example Risk Reduction References
4. Example Inspection Findings/Enforcement



1. Permit Compliance and Expectations



1. Permit Compliance and Expectations

- Sewer System Management Plans (SSMPs), redundancy, and “best practices” employed must:
 - 1) ensure compliance with SSS WDRs, and
 - 2) effectively eliminate or reduce SSOs.

PERMIT PROHIBITS DISHCARGES

Decrease human/environmental risk

Proactive” approach/management

Risk management/cost effectiveness

Alternatives to Discharge

Use of adequate backup equipment

Prohibition C.1 (p7)

Finding 3 (p1)

Finding 3 (p1)

Finding 5 (p2)

Provision D.6(iii)

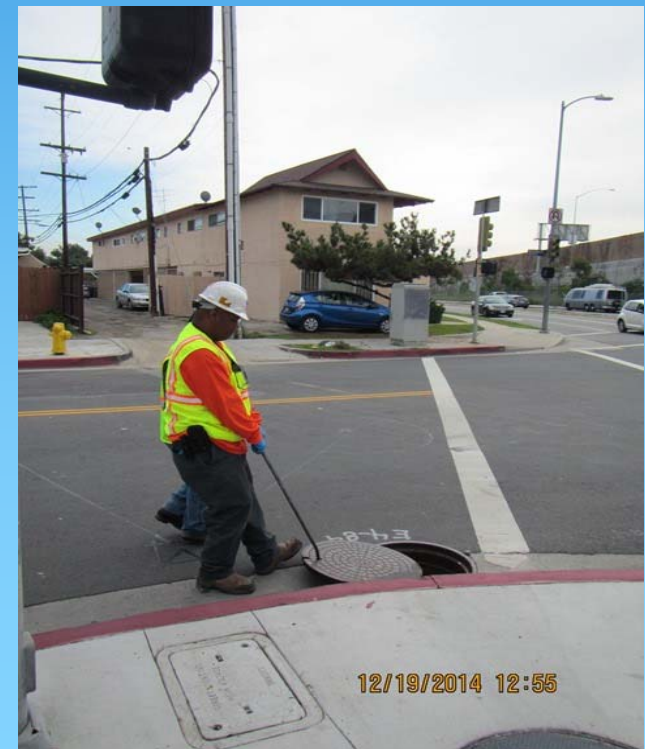
Provision D.6(iii)

2. Example SSO Reduction Practices



2. Inspections: Example Practices

- Portable backup pump and “Smart Cover” installed to supplement SCADA alarms and reduce SSO risks/threats
- Station located on major street and adjacent to freeway



2. Inspections: Example Practices

- “Smart Cover” installed in mainline used to monitor levels in residential area posing high SSO risk/threat
- Assists staff with determining appropriate cleaning frequency



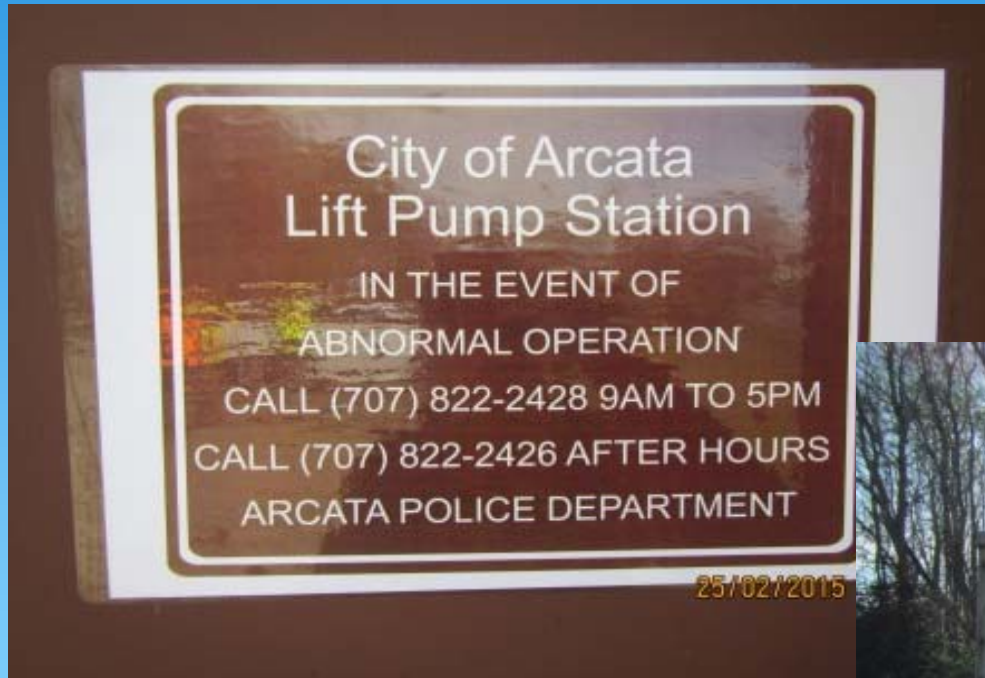
2. Inspections: Example Practices

- Critical equipment/spare parts [SSS WDRs, Provision D.13(iv)(e)]



2. Inspections: Example Practices

- Emergency signage to alert public + help reduce response time



2. Inspections: Example Practices

- Rainfall inflow mitigation (manhole inserts)



2. Inspections: Example Practices

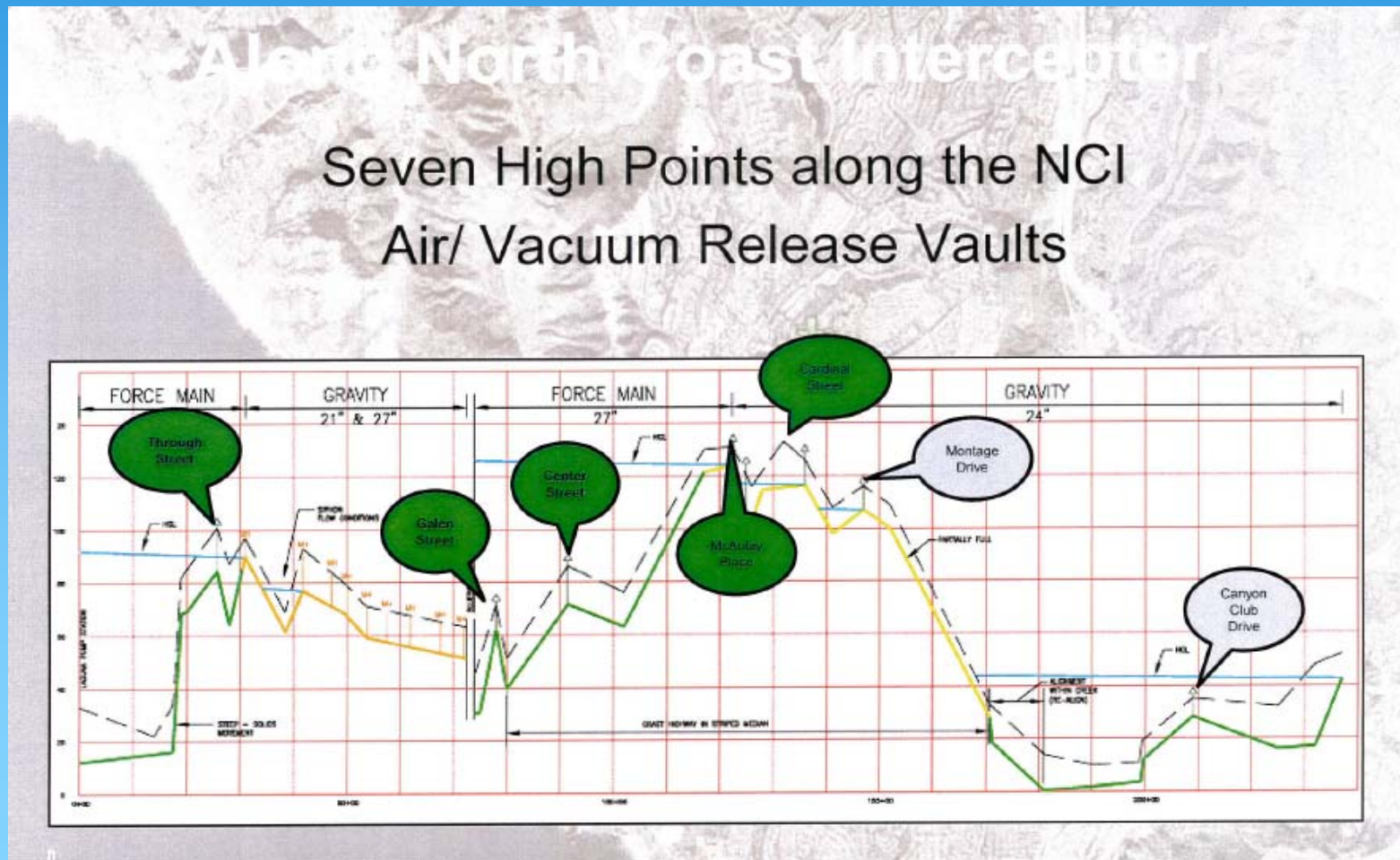
- Pump station “impoundments”



Photos 11-12: North Market lift station engineered impoundment gate valve and overflow drain (L), and impoundment levy (R)

2. Inspections: Example Practices

- Critical system mapping, study, and engineering evaluation



2. Inspections: Example Practices

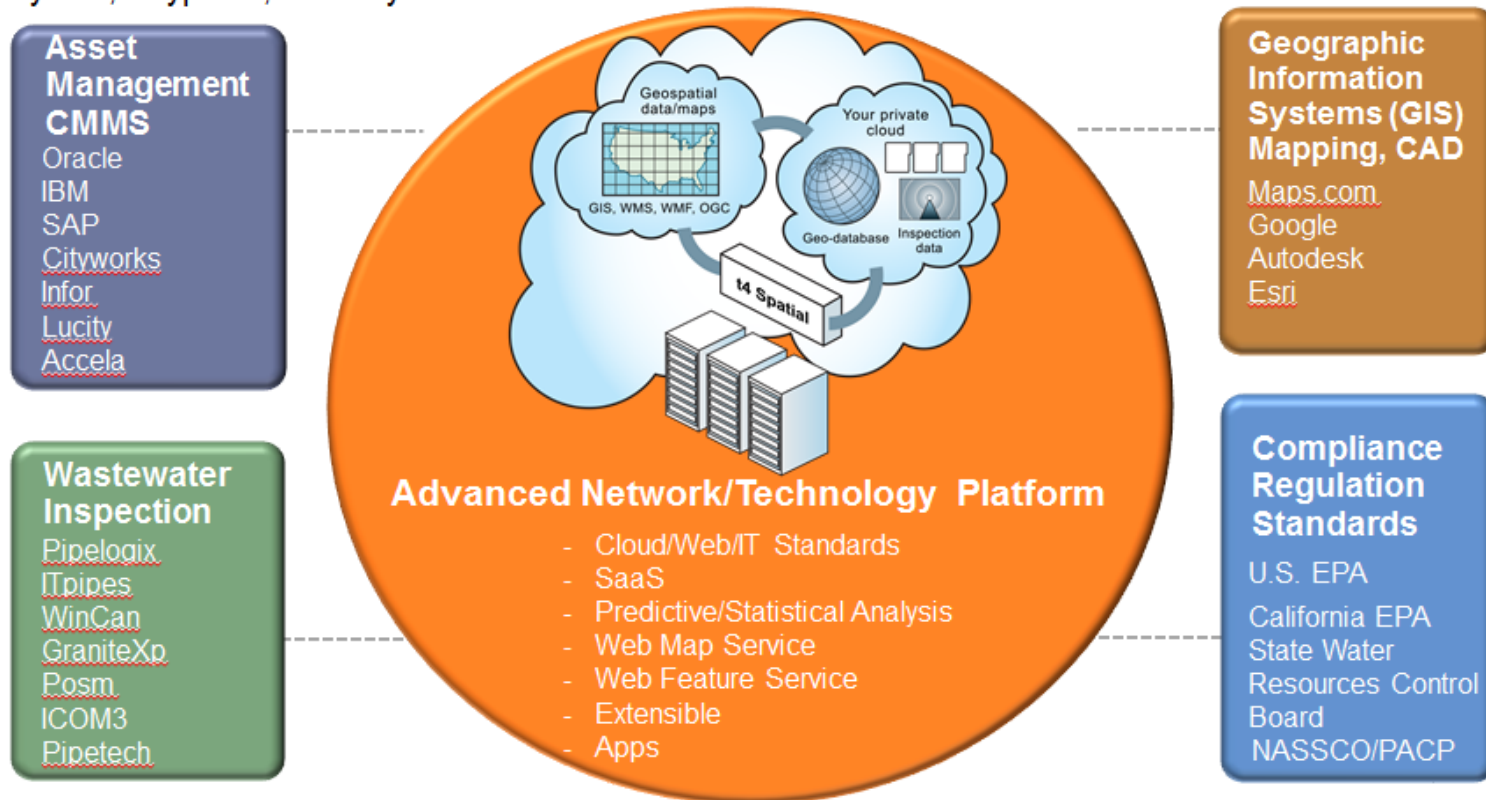
- Creek crossing strategic improvement programs



2. Inspections: Example Practices

- Advanced data management

- A new platform that integrates data from multiple silos and provides universal accessibility
- Secure, universal access to Data
- Anytime, Anyplace, with Any Device



2. Inspections: Example Practices

- Standard Operating Procedures (SOPs)

| Station Shutdown Checklist | |
|----------------------------|--|
| | Bypass pumps in place and ready to prime: |
| | Open B4, B3, B2 and B1 to pressurize the bypass piping. |
| | Close the 30" valve in Glenneyre 48 turns, then, as the 30" valve reaches 55 turns, Manhole 3 will start surcharging. Manhole 3 should fill to within eight feet of the rim before the pumps attempt to prime. |
| | If bypass pumps fail to prime, simply open the 30" valve 5 – 10 turns to transition back to normal pump station operation. |
| | Close the 30" valve on Glenneyre, |
| | Close the STV (surge tank valve), |
| | Manually pump down the wetwell until rumble : |
| | Close valves D7 and D6. Lock out/tag out controls |
| | Turn off O2 panel. |
| | The station is now isolated and all valves inside the station are serviced. |
| Station Restart Checklist | |
| | Bypass complete, transition back to lift station operation: |
| | Slowly open D6 and D7 to pressurize the system. Verify all suction and discharge valves are open and controls are set to "auto." |
| | The station may now be put back online by slowly opening the 30" valve 5 – 10 turns filling the wet well, then priming and starting station pumps as normal. |
| | Open the STV and verify the air level in the surge tank sight tube. <i>For problems, the station may be transitioned back onto the bypass by closing the 30" valve.</i> |
| | Close valve B4 once bypass pumps are shut down. Restart the O2 system. |

3. Inspections: Example Practices

- Permit requires “best practices” to be effective
- SSO risk reduction practices necessary to comply
- Wide variety of options/strategies/technologies observed during inspections throughout the state

3. Example Risk Reduction References



3. Example Risk Reduction References

2013 CSRMA Best Recommended Sewer Collection System Risk Management Practices

Asset Mapping

1. Has your agency identified and mapped all the gravity sewer line segments, pipeline access points (manholes, lamp holes, rod holes, etc.), pumping facilities, pressure pipes and valves, and stormwater-related facilities?
2. Does your agency currently have sewer system assets mapped in a system that can be quickly updated with field locations that is accessible to administrative and field staff levels?
3. Has your agency mapped stormwater-related facilities and overlaid them on your sanitary system mapping?
4. Does your agency have a formal review process in place to ensure that any mapping issues noted by field staff or others are addressed in the official agency maps?
5. Has your agency put in place a systematic confirmation of assets to ensure existing mapping accurately reflects assets in the field?
6. Does your agency periodically check in with cooperating agencies to update mapping they provide, i.e. stormwater system mapping from the area stormwater agency?

3. Example SSO Risk Reduction References

Core Attributes of Effectively Managed Wastewater Collection Systems

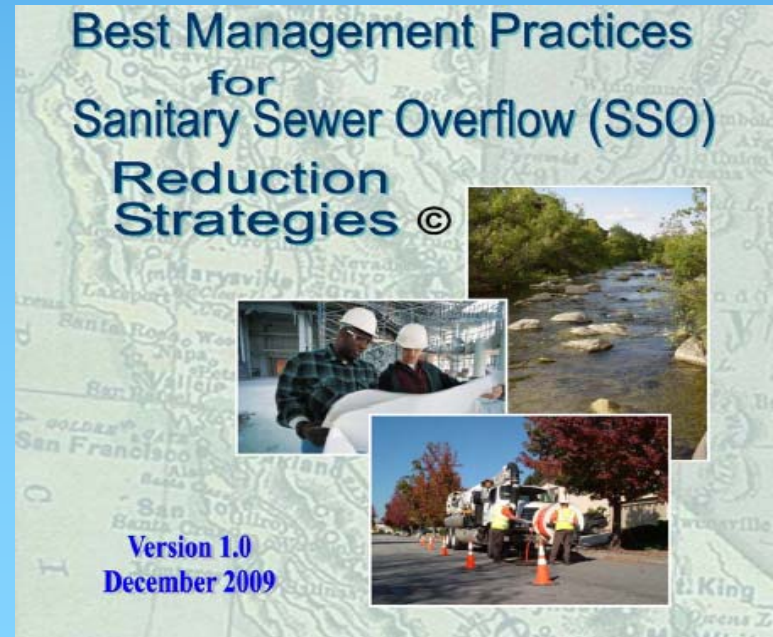
July 2010

A Guide for Developing and Updating of
Sewer System Management Plans (SSMPs)



Best Management Practices
for
Sanitary Sewer Overflow (SSO)
Reduction
Strategies ©

Version 1.0
December 2009



4. Example Inspection Findings/Enforcement



4. Example Inspection Findings

Common Violations

- Failure to implement Rehabilitation/Repair and SECAP programs, including approved short/long-term schedules and funding [D.13(iv)(c) and D.13(viii)]
- Failure to conduct compliant SSMP Program Audits [(D.13(x))]
- Failure to Upload link or SSMP into CIWQS [Amended MRP, section 8.iv]
- Failure to provide SSO documentation and volume justifications [Amended MRP]
- Failure to provide SSO monitoring program for large SSOs [Amended MRP]
- Failure to meet SSO 2-hour/CIWQS certification timelines [Amended MRP]

Common Areas of Concern

Collections staff/training/procedures [D.8, D.13(vi)]

FOG program implementation issues [D.13(vii)]

Lack of inspection records/details

Lack of enforcement for violators

Legal Authority/Sewer Use Ordinance [D.13(iii)]

Failure to meet minimum requirements

| Enrollee | Main Identified Violations /Areas of Concern |
|----------------------------------|---|
| Whittier City | <ul style="list-style-type: none"> Failed to implement SSMP Rehabilitation and Replacement Programs [SSS WDRs, Provision [D.13(iv)(c)] Deficient SSMP Capital Improvement Program Failed to conduct SSMP 2-year Audits No Large SSO Water Quality Monitoring Plan |
| Palos Verdes Estates City | <ul style="list-style-type: none"> Lacks sewer fee rate structure for funding ongoing O+M/rehabilitation, replacement, and capacity Failed to implement SSMP Rehabilitation and Replacement Programs Failed to maintain service call records |
| National City | <ul style="list-style-type: none"> Failed to implement SSMP Rehabilitation, Replacement and Capacity Programs Deficient SSMP Capital Improvement Program Failed to conduct SSMP 2-year Audits Lacks Collection System Resources |
| Manhattan Beach City | <ul style="list-style-type: none"> Deficient SSMP Capital Improvement Program Failed to conduct SSMP 2-year Audits Lacks SOPs for Operations and Maintenance Program |
| Santa Monica City | <ul style="list-style-type: none"> Failed to implement SSMP Rehabilitation and Replacement Programs Failed to conduct SSMP 2-year Audits Inadequate recovery from storm drain channels FOG buildup observed |
| Monrovia City | <ul style="list-style-type: none"> Failed to update SECAP since 1985 Failed to maintain sewer maps Some FOG and capacity issues “Paved-over” manhole identified |
| Inglewood City | <ul style="list-style-type: none"> Failed to implement SSMP Rehabilitation and Replacement Programs Deficient SSMP Capital Improvement Program Lacking SSMP 2-year Audits Failed to implement FOG program |
| Diamond Bar City | <ul style="list-style-type: none"> Lacks sewer fee rate structure for funding ongoing O+M/rehabilitation, replacement, and capacity Failed to implement SSMP Rehabilitation and Replacement Programs Failed to conduct SECAP |
| Victorville City | <ul style="list-style-type: none"> Failed to implement SSMP Rehabilitation and Replacement Programs Failure to report Category 1 SSOs |

4. Example Enforcement

Costa Mesa, RB8 (\$364K: two SSOs)

http://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2015/R8-2015-0037_Costa_Mesa_ACL.pdf

Eastern Municipal Water District (\$110K, one SSO)

http://www.waterboards.ca.gov/sandiego/board_decisions/adopted_orders/2015/R9-2015-0048.pdf

City of Alhambra, RB4 (SSS WDRs program violations/SSOs; AGO referral final judgement)

http://www.waterboards.ca.gov/losangeles/press_room/press_releases/2016/NoticeofEntryofJudgment.pdf

City of Compton, RB4 (SSS WDRs violations; AGO referral; pending):

[http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/enforcement/Enforce/Action_Settlement/2013/Sept/ProposedResolutionCityofCompton\(09-06-2013\).pdf](http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/enforcement/Enforce/Action_Settlement/2013/Sept/ProposedResolutionCityofCompton(09-06-2013).pdf)

City of San Gabriel, RB4 (SSS WDRs violations; AGO referral; pending)

[http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/enforcement/Enforce/Action_Settlement/2013/Sept/ProposedResolutionCityofSanGabriel\(09-06-2013\).pdf](http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/enforcement/Enforce/Action_Settlement/2013/Sept/ProposedResolutionCityofSanGabriel(09-06-2013).pdf)

City of Taft, RB5F (\$250K ACL, one SSO):

http://www.waterboards.ca.gov/centralvalley/board_decisions/tentative_orders/cityoftaft_stip/cityoftaft_stip.pdf

Contact Information

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