DATE: April 25, 2023
TO: Mayor and Council Members
FROM: Public Works Department
SUBJECT: Sewer System Management Plan (SSMP) 2021 Update

RECOMMENDATION:
It is recommended that the Mayor and Council Members adopt a resolution approving the Sewer System Management Plan 2021 (SSMP) Update.

BACKGROUND:
The City of Inglewood (City) provides sewer services to the community through a collection system comprised of 145 miles of pipes and 3,100 manholes. On December 6, 2022, the State Water Resources Control Board (SWRCB) adopted the Statewide Waste Discharge Requirements (WDR) to regulate wastewater collection system management on Order No. WQ 2022-0103-DWQ (General Order).

This General Order regulates sanitary sewer systems designed to convey sewage. For the purpose of this Order, a sanitary sewer system includes, but is not limited to, pipes, valves, pump stations, manholes, siphons, wet wells, diversion structures, and other pertinent infrastructure.

Sewage is untreated or partially treated domestic, municipal, commercial, or industrial waste (including sewage sludge), and any mixture of these wastes with inflow or infiltration of stormwater or groundwater conveyed in a sanitary sewer system. Sewage contains high levels of suspended solids, non-digested organic waste, pathogenic bacteria, viruses, toxic pollutants, nutrients, oxygen-demanding organic compounds, oils, grease, pharmaceuticals, and other harmful pollutants.

For the purpose of this General Order, a spill is a discharge of sewage from any portion of a sanitary sewer system, due to a sanitary sewer system overflow, operational failure, or infrastructure failure. Sewage and its associated wastewater spilled from a sanitary sewer system may threaten public health, beneficial uses of waters of the State, and the environment.

DISCUSSION:
This General Order serves as statewide waste discharge requirements and supersedes the previous State Water Resources Control Board (State Water Board) Order 2006-0003-DWQ and amendments thereafter. All sections and attachments of this General Order are enforceable by the State Water Board and Regional Water Quality Control Boards (Regional Water Boards). Through this General Order, the State Water Board requires City of Inglewood to do the following:
• Comply with federal and State prohibitions of discharge of sewage to waters of the State, including federal waters of the United States;
• Comply with specifications, notification, monitoring, reporting, and recordkeeping requirements in this General Order that implement the federal Clean Water Act, the California Water Code (Water Code), water quality control plans (including Regional Water Board Basin Plans) and policies;
• Proactively operate and maintain resilient sanitary sewer systems to prevent spills;
• Eliminate discharges of sewage to waters of the State through the effective implementation of a Sewer System Management Plan;
• Monitor, track, and analyze spills for ongoing system-specific performance improvements; and
• Report noncompliance with this General Order per reporting requirements.

The purpose of the WDR is to develop a regulatory mechanism to provide a consistent statewide approach for reducing sanitary sewer overflows (SSOs). As part of the WDR, all publicly-owned sanitary sewer collection systems in California must develop a Sewer System Management Plan (SSMP), regularly update it every six (6) years, and perform an audit every three (3) years. On October 13, 2015, the City adopted the SSMP 2015. After three (3) years, in 2018, an internal audit was done.

The City of Inglewood had no city-owned SSOs (Sanitary Sewer Overflows) from August 2018 to June 2021. “No Spill” Reports were filed in the California Integrated Water Quality System Project (CIWQS) system. In July 2021, an internal audit was done, and an audit report was completed.

Staff is requesting that the City Council adopt a resolution to approve the Sewer System Management Plan (SSMP) 2021 Update (including the internal audit report) per existing Order 2006-0003-DWQSWRCB and new Order No. WQ 2022-0103-DWQ Statewide Waste Discharge Requirements (WDR) for Sanitary Sewer Systems.

FINANCIAL/FUNDING ISSUES AND SOURCES:
None.

DESCRIPTION OF ANY ATTACHMENTS:
Attachment 1: Resolution with Exhibit “A”

PREPARED BY:
Thomas C. Lee, P.E., Principal Engineer-Water Resources
Rae Aldridge, Management Assistant to the Director

COUNCIL PRESENTER:
Louis A. Atwell, P.E., Assistant City Manager/PW Director
APPROVAL VERIFICATION SHEET

DEPARTMENT HEAD/ASSISTANT CITY MANAGER APPROVAL: Louis A. Atwell, PW Director/Asst. City Mgr.

CITY MANAGER APPROVAL: Artie Fields, City Manager
ATTACHMENT NO. 1

Resolution
RESOLUTION NO. ______

A RESOLUTION OF THE CITY COUNCIL OF THE CITY
OF INGLEWOOD, CALIFORNIA, UPDATING THE
CITY’S SEWER SYSTEM MANAGEMENT PLAN.

WHEREAS, the State Water Resources Control Board adopted statewide General Waste
Discharge Requirements ("GWDR") for publically owned sanitary sewer systems requiring the
development and implementation of a system-specific local Sewer System Management Plan
("SSMP") that documents a comprehensive program for preventing and addressing sewer
system overflows and sewer collection system operation, maintenance, and repair; and

WHEREAS, on December 6, 2022, the State Water Resources Control Board (SWRCB)
adopted the Statewide Waste Discharge Requirements (WDR) to regulate wastewater
collection system management on Order No. WQ 2022-0103-DWQ (the "Order"); and

WHEREAS, this Order regulates sanitary sewer systems designed to convey sewage. For
this Order, a sanitary sewer system includes, but is not limited to, pipes, valves, pump stations,
manholes, siphons, wet wells, diversion structures, and/or other pertinent infrastructure,
upstream of a wastewater treatment plant headworks; and

WHEREAS, sewage is untreated or partially treated domestic, municipal, commercial,
and/or industrial waste (including sewage sludge), and any mixture of these wastes with inflow
or infiltration of stormwater or groundwater, conveyed in a sanitary sewer system; and

WHEREAS, sewage contains high levels of suspended solids, non-digested organic
waste, pathogenic bacteria, viruses, toxic pollutants, nutrients, oxygen-demanding organic
compounds, oils, grease, pharmaceuticals, and other harmful pollutants; and

WHEREAS, for the purpose of this Order, a spill is a discharge of sewage from any
portion of a sanitary sewer system due to a sanitary sewer system overflow, operational
failure, and/or infrastructure failure. Sewage and its associated wastewater spilled from a
sanitary sewer system may threaten public health, beneficial uses of waters of the State, and
the environment; and


WHEREAS, this Order serves as a statewide waste discharge requirement and supersedes the previous State Water Resources Control Board (State Water Board) Order 2006-0003-DWQ and amendments thereafter. All sections and attachments of this Order are enforceable by the State Water Board and Regional Water Quality Control Boards (Regional Water Boards); and

WHEREAS, through this Order, the State Water Board requires the City of Inglewood to:

- Comply with federal and state prohibitions of discharge of sewage to waters of the State, including federal waters of the United States;
- Comply with specifications, and notification, monitoring, reporting, and recordkeeping requirements that implement the federal Clean Water Act, the California Water Code (Water Code), water quality control plans (including Regional Water Board Basin Plans), and policies;
- Proactively operate and maintain resilient sanitary sewer systems to prevent spills;
- Eliminate discharges of sewage to waters of the State through effective the implementation of a Sewer System Management Plan;
- Monitor, track, and analyze spills for ongoing system-specific performance improvements; and
- Report non-compliance with this Order per reporting requirements.

WHEREAS, the purpose of the WDR is to develop a regulatory mechanism to provide a consistent statewide approach for reducing sanitary sewer overflows (SSOs). As part of the WDR, all publicly owned sanitary sewer collection systems in California must develop a Sewer System Management Plan (SSMP) which must be updated every six (6) years and an audit every three (3) years; and

WHEREAS, Staff has prepared an updated SSMP; and

WHEREAS, the City shall prepare and file a recertification with the State Water Resources Control Board after the adoption of the updated SSMP.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Inglewood,
California as follows:

**SECTION 1.** The above recitals are true and correct and are incorporated herein by this reference.

**SECTION 2.** The City Council hereby adopts Exhibit “A,” the updated Sewer System Management Plan dated July 20, 2021, and incorporates it herein by this reference as if set for in full.

**BE IT FURTHER RESOLVED** that the City Clerk shall certify to the adoption of this resolution and the same shall be in full force and effect immediately upon adoption.

**PASSED, APPROVED, AND ADOPTED** at a regular meeting of the City Council of the City of Inglewood, California, this ________ day of ________ 2023.

__________________________________________________________
James T. Butts, Jr., Mayor
City of Inglewood

**ATTEST:**

__________________________________________________________
Aisha L. Thompson, City Clerk
City of Inglewood
Exhibit “A”

Sewer System Management Plan 2021 Update
Sewer System Management Plan Update
(Final Report)

City of Inglewood
One West Manchester Boulevard
Inglewood, CA 90301

Prepared By:
Hall & Foreman, Inc.
17782 17th Street, Suite 200
Tustin, California 92780
JN150104

Yazdan T. Emrani, P.E.

Updated by City: 7/20/2021
ABBREVIATIONS

BMP - Best Management Practice
CIP - Capital Improvement Program
CIWQS - California Integrated Water Quality System
CMMS – Computerized Maintenance Management System
CWC - California Water Code
CWEA – California Water Environment Association
DPW – Department of Public Works
FOG - Fats, Oils, and Grease
FPS - Feet per Second
GIS - Geographic Information Systems
H&F - Hall & Foreman, a division of David Evans and Associates, Inc.
l/l - Infiltration/Inflow
IMC – Inglewood Municipal Code
KPI - Key Performance Indicator
LACSD - Los Angeles County Sanitation Districts
LRO - Legally Responsible Official
MRP - Monitoring and Reporting Program
MMRP - Measurement, Monitoring and Reporting Procedures
NOI - Notice of Intent
NPDES - National Pollutant DischargeElimination System
OES - Office of Emergency Services
O&M - Operations and Maintenance
PDWF - Peak Dry Weather Flow
PWD - Public Works Director
RWQCB - Regional Water Quality Control Board
SECAP - Sewer System Evaluation and Capacity Assurance Plan
SO&M – Sewer Operations & Maintenance
SSMP - Sewer System Management Plan
SSO - Sanitary Sewer Overflow
SWRCB - State Water Resources Control Board
# Table of Contents

**EXECUTIVE SUMMARY** ................................................................. 6

**SECTION 1**  INTRODUCTION .......................................................... 7

**SECTION 2**  SSO CATEGORIES AS DEFINED BY THE REVISED MRP .......... 11

**SECTION 3**  GOALS ..................................................................... 14

**SECTION 4**  ORGANIZATION .......................................................... 17

**SECTION 5**  LEGAL AUTHORITY ......................................................... 25

**SECTION 6**  OPERATION AND MAINTENANCE PROGRAM .................. 28

**SECTION 7**  DESIGN AND PERFORMANCE PROVISIONS ................... 33

**SECTION 8**  OVERFLOW AND EMERGENCY RESPONSE PLAN ........... 35

**SECTION 9**  FOG CONTROL ............................................................ 40

**SECTION 10**  SYSTEM EVALUATION AND CAPACITY ASSURANCE .... 45

**SECTION 11**  MONITORING, MEASUREMENT, AND PROGRAM MODIFICATION ........................................ 48

**SECTION 12**  PROGRAM AUDIT PROCEDURES ................................. 50

**SECTION 13**  COMMUNICATION PROGRAM ...................................... 52
APPENDICES

Appendix A .......... Waste Discharge Requirements (Order No. 2006-0003-DWQ)
Appendix B .......... Monitoring and Reporting Program (No. 2006-0003) 'Amended'
Appendix C .......... WDR 'Fact Sheet'
Appendix D .......... Agency WDR Application (NOI)
Appendix E .......... Internal Audit
DEFINITIONS

**Blockage or Stoppage** - A build-up of debris in the main sewer line or lateral, which obstructs the flow of wastewater and allows the waste flow to back up behind the blockage, sometimes causing an overflow.

**Geographical Information System (GIS)** – A computerized database linked with mapping, which includes various layers of information used for asset management purposes. A GIS typically contains base information such as streets and parcels. Examples of information contained in sewer system GIS files can include: a sewer main map, sewer feature such as pipe location, diameter, material, condition, age, last date cleaned or repaired, and links to pictures or video inspections.

**Infiltration/Inflow** (I/I) -- Infiltration is generally extraneous subsurface water that enters the sewer system over long periods of time, such as groundwater seepage through joints, cracks and manhole structures. Inflow is generally extraneous surface waters that enters the system during a storm or flooding event, such as through manholes, illicit drain connections or other defects in the sewer. While it is impossible to control all I/I, it is highly desirable to reduce I/I when cost-effective.

**Lateral (House Connection Sewer)** - The portion of sewer that connects a structure (residence or business) with the main sewer line in the street, alley or easement.

**Wastewater Collection System** -- All pipelines, pump stations, and other related facilities, upstream of the headworks of the wastewater treatment plant, which convey wastewater from its sources to the wastewater treatment plant.

**Waters of the United States** (Please refer to the link below to access Federal Environmental Protection Agency website)

https://www.epa.gov/wotus/about-waters-united-states
Executive Summary

This plan document was initially prepared in 2009 in compliance with a formal order issued by the State Water Resources Control Board. The order requires every owner and operator of publicly owned sewer systems to develop and implement a system specific Sewer System Management Plan (SSMP). This plan sets forth goals and actions to be followed, and guidelines for various activities involved in managing, operating, maintaining, repairing, replacing and expanding the sewer system. Section 8 describes actions to follow when responding to a Sanitary Sewer Overflow (SSO) occurrence within the community, including reporting obligations. There are chapters that describe legal authorities for managing the system, and ministerial actions required in monitoring, auditing, reporting and communicating with the public and regulators. There are specific requirements for accomplishing public involvement and the reporting and modifying (changing) of the plan. These later requirements are intended to raise public awareness of the hazards associated with SSO events and to minimize the occurrence of such events.

- The City’s updated plan is to be approved and certified before December 31, 2015
- The plan is to be monitored and updated no less frequent than every five years
- The plan must be periodically audited for effectiveness, a report compiled and kept on file and such audits must occur no less frequent than every two years
- There are reporting timeframes for both emergency and routine reporting events
- The adoption of and any revision to the plan must be adopted by the City Council at a noticed meeting
- Copies of the approved plan must be available for public review, and when requested by the State or Local regulatory agencies copies are to be provided, including any audit reports.

The key elements to the successful implementation of this plan are: 1) design and construction of replacement pipelines for the previously identified capacity deficient pipelines in the sewer system and 2) the continuing annual CCTV inspection of designated areas within the sewer system to determine further defects that may exist. These actions in concert with the routine maintenance and operation activities will help the City to limit the risk of SSO events within the community.

Based on a comprehensive audit and overall review of our 2017 Sewer Master Plan, 2015 SSMP, 2009 SSMP, the 2007 Sewer Master Plan, Public Works Department, and a review of all other related documents, the City of Inglewood hereby certifies that all SSMP Goals are on-going and will be continuously monitored and updated. This SSMP also incorporates our discussions with the RWQCB and SWRCB staff, and City’s response letter to the SWRCB’s Notice of Violation letter and action items proposed.
SECTION 1 – Introduction

1.1 Service Area and Sewer System

The City of Inglewood is located in the County of Los Angeles just a few miles from the California coastline. It is bordered to the south by the City of Hawthorne and to the east, north, and west by portions of unincorporated Los Angeles County and the City of Los Angeles. The City serves a population of approximately 105,181 in 2021. The City’s Public Works Department manages the City’s sanitary sewer collection system.

The sewer collection system consists of about 145 miles of gravity sewer pipe ranging in size from 4 to 16 inches in diameter and approximately 3,100 manholes. The general direction of flow is from north to south and east to west. The majority of sewers tie directly into one of the Los Angeles County Sanitation Districts (LACSD) trunk sewers crossing through the City, located primarily in larger streets. There are approximately 203 connections to the LACSD, which convey City’s wastewater out of the City to the and south and continue to flow by gravity to the LACSD Joint Water Pollution Control Plant located in the City of Carson for treatment and disposal of wastewater.

The sewers are primarily constructed of vitrified clay pipe with approximately 95 percent of the pipes sized at 8-inch in diameter. The majority of the existing sewer system was constructed before 1960.

1.2 Regulatory Overview

The State Water Resources Control Board (State Water Board) adopted Water Quality Order 2006-0003-DWQ, on May 2, 2006, requiring all public agencies that own sanitary sewer collection systems greater than one mile in length to comply with the Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems. All public agencies must apply for coverage by November 2, 2006, by completing the notice of intent (NOI) and legally responsible official (LRO) forms that the State Water Board distributed. The City of Inglewood has completed the NOI and is within the regulatory time frames.

The intent of the WDR is to provide consistent statewide requirements for managing and regulating sanitary sewer systems throughout California. The State Water Board recognized a need to provide this consistent regulatory measure because many of the Regional Water Boards were beginning to implement similar measures inconsistently throughout the State, which was creating confusion in the discharger community. The State Water Board believes that providing a consistent regulatory measure that identifies regulatory expectations and comprehensive sanitary sewer overflow data will ultimately yield better collection system management and performance.

There are three major components to the WDR, including:
- Sanitary Sewer Overflow (SSO) Prohibitions;
- Sanitary Sewer Management Plan (SSMP) Elements; and
- SSO reporting.

While there are many other relevant components and findings within the WDR, the major components identified above represent most of the State Water Board’s regulatory expectations for the implementation of the WDR. This regulatory audit is intended to provide an analysis of the current programs and practices within the City of Inglewood that address the above issues. This
document will provide recommendations to ensure the development of appropriate SSMP programs and an appropriate time schedule necessary to comply with the WDR.

1.3 Prohibitions

Section C of the WDR identifies and prohibits SSOs that results in a discharge of untreated or partially treated wastewater to waters of the United States and/or creates a nuisance as defined in California Water Code (CWC) Section 13050(m) is prohibited. CWC section 13050, subdivision (m), defines nuisance as anything which meets all of the following requirements:

a) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.

b) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.

c) Occurs during, or as a result of, the treatment or disposal of wastes.

Since the State Water Board has not specifically defined SSOs that are subject to this prohibition and criteria for determining whether or not an SSO violates the above prohibition, the State and/or Regional Water Board will consider potential violations on a case-by-case basis. In general, however, if an SSO results in a discharge to a surface water or drainage channel, the Water Board will consider this a discharge to Waters of the US. Additionally, if an SSO reaches an enclosed storm drainage pipe, and the SSO was not fully contained, captured, and pumped back into the sanitary sewer system, the Water Board will generally assume that the SSO reached a water of the US. In both cases the SSO will probably result in a violation of the WDR prohibition.

Determining whether an SSO created a nuisance is even more problematic and subjective. Again, since the State Water Board has not specifically defined SSOs that are subject to the nuisance prohibition and criteria for determining whether or not an SSO is in violation of this prohibition, the State and/or Regional Water Board will consider violations on a case-by-case basis.

In both cases, while reporting SSOs, determining whether or not the SSO violated the prohibition is not up to the reporting Agency. It is the enforcement agency’s responsibility to determine compliance with the WDR.

1.4 SSO Reporting

WDR finding number 9 states:

Both uniform SSO reporting and a centralized statewide electronic database are needed to collect information to allow the State Water Board and Regional Water Quality Control Boards (Regional Water Boards) to effectively analyze the extent of SSOs statewide and their potential impacts on beneficial uses and public health. The monitoring and reporting program required by this Order and the attached Monitoring and Reporting Program No. 2006-0003-DWQ, are necessary to assure compliance with these waste discharge requirements (WDRs).
Furthermore, the State Water Board Fact Sheet states:

SSOs can be distinguished between those that impact water quality and/or create a nuisance, and those that are indicators of collection system performance. Additionally, SSO liability is attributed to either private entities (homeowners, businesses, private communities, etc.) or public entities.

Although all types of SSOs are important to track, the reporting time frames and the type of information that need to be conveyed differ. The Reporting Program and Online SSO Database clearly distinguish the type of spill (major or minor) and the type of entity that owns the portion of the collection system that experienced the SSO (public or private entity). The reason to require SSO reporting for SSOs that do not necessarily impact public health or the environment is because these types of SSOs are indicators of collection system performance and management program effectiveness, and may serve as a sign of larger and more serious problems that should be addressed. Although these types of spills are important and must be regulated by collection system owners, the information that should be tracked and the time required to get them into the online reporting system are not as stringent.

Obviously, SSOs that are large in nature, affect public health, or affect the environment must be reported as soon as practicable and information associated with both the spill and efforts to mitigate the spill must be detailed. Since the Online SSO Database is a web based application requiring computer connection to the internet and is typically not as available as telephone communication would be, the Online Database will not replace emergency notification, which may be required by a Regional Water Board, Office of Emergency Services, or a County Health or Environmental Health Agency.

In order to implement the above vision, the State Water Board has developed a web based database that will be used to report all SSOs. This online spill reporting system is hosted, controlled, and maintained by the State Water Board. The web address for this site is http://ciwgs.waterboards.ca.gov

This online database is maintained on a secure site and is controlled by unique usernames and passwords. Once the City has enrolled into the WDR, and has identified a Legally Responsible Official (LRO), the State Water Board will issue both a user name and password to the LRO and notify that individual of this information.

These accounts will allow controlled and secure entry into the SSO Database. Additionally, within thirty (30) days of receiving an account and prior to recording SSOs into the SSO Database, all Enrollees must complete the “Collection System Questionnaire”, which collects pertinent information regarding an Enrollee’s collection system. The “Collection System Questionnaire” must be updated at least every 12 months.

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. 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.
All reporting requirements are described within the Monitoring and Reporting Program (MRP) that was adopted by the State Water Board Order, along with the WDR.

California Health and Safety Code section 5411.5, states that:

Any person who, without regard to intent or negligence, causes or permits any untreated wastewater or other waste to be discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State, as soon as that person has knowledge of the discharge, shall immediately notify the local health officer of the discharge. Discharges of untreated or partially treated wastewater to storm drains and drainage channels, whether man-made or natural or concrete-lined, shall be reported as required above.

California Water Code section 13271, also requires any SSO greater than 1,000 gallons that is discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State shall also be reported to the Office of Emergency Services as soon as:

1. That person has knowledge of the discharge,
2. Notification is possible, and
3. Notification can be provided without substantially impeding cleanup or other emergency measures.
SECTION 2 – SSO Categories as Defined by the Revised MRP

An SSO is defined by the WDR as any overflow, spill, release, discharge, or diversion of untreated or partially treated wastewater from a sanitary sewer system, including:

Category 1 – Discharges of untreated or partially treated wastewater of any volume resulting from an enrollee’s sanitary sewer system failure or flow condition that:

- Reach surface water and/or reach a drainage channel tributary to a surface water; or Reach a MS4 and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond).

Category 2 – Discharges of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from an enrollee’s sanitary sewer system failure or flow condition that does not reach a surface water, a drainage channel, or the MS4 unless the entire SSO volume discharged to the storm drain system is fully recovered and disposed of properly.

Category 3 – All other discharges of untreated or partially treated wastewater resulting from an enrollee’s sanitary sewer system failure or flow condition.

SSOs may cause a public nuisance, particularly when raw wastewater is discharged to areas having high public exposure, such as streets or surface waters used for drinking, fishing, or body-contact recreation. SSOs may pollute surface or ground waters, threaten public health, adversely affect aquatic life, and impair the recreational use and aesthetic enjoyment of surface waters.

Agencies in California that own sanitary sewer systems and experience SSOs are required to enter the SSO information into California’s Integrated Water Quality System (CIWQS) database—the SWRCB’s information management system for regulatory and water quality data reporting. In addition, SWRCB requires that agencies notify the State Office of Emergency Services (OES) within 24 hours of any spill that exceeds 1,000 gallons.

In summary, the WDR is intended to:

- Provide a consistent and unified statewide approach for the reporting and database tracking of SSOs.
- Establish consistent and uniform requirements for SSMP development and implementation.
- Facilitate consistent enforcement of the WDR regulation and violations.

Capacity assurance is at the heart of the WDR. The SWRCB’s WDR requires the preparation of SSMPs, while implementation of SSMPs is the responsibility of the nine Regional Water Quality Control Boards (RWQCBs). The SSMP consists of a set of documented plans to address how a wastewater collection system conducts business management, funding, design, operations, maintenance, and emergency response. The System Evaluation and Capacity Assurance Plan (SECAP) element of the SSMP includes evaluation of peak flows, design criteria, and capacity.
enhancement measures, and a schedule with planned completion dates of capital improvements.

Goals of the SSMP are to:

- Properly manage, operate, and maintain all portions of the agency’s wastewater collection system;
- Provide adequate capacity to convey peak wastewater flows;
- Minimize the frequency of SSOs;
- Mitigate the impacts that are associated with any SSO that may occur; and
- Meet all applicable regulatory notification and reporting requirements.

The SSMP prescribes specific milestones that relate to the specific elements required in the WDR:

1. Goals,
2. Organization,
3. Legal Authority,
4. Operations and Maintenance Program,
5. Design and Performance Provisions,
6. Overflow Emergency Response Plan,
7. Fats, Oils and Grease (FOG) Control Program,
8. System Evaluation and Capacity Assurance Plan (SECAP),
9. Monitoring, Management, and Plan Modifications,
10. SSMP Program Audits, and
11. Communication Program.

An SSMP program audit must be conducted at least every two years, and the audit report must be kept on file by the City staff. Successful implementation of an SSMP and compliance with the WDR could result in significant cost-savings to the City and its residents.

The City performed a comprehensive Gap Analysis and audit of its SSMP, utilizing an outside consultant (Hall & Foreman) which was completed in August 2015. The results and recommendations of the Gap Analysis and audit have been incorporated into this document.

In compliance with the WDR Order, the City did file its application form with the SWRCB as required. As a result, the City received its Username and Password for accessing the California Integrated Water Quality System (CIWQS) database. Within the database reporting program, the City completed its “collection system questionnaire” and will file all subsequent updates and all required SSO reporting.

Additionally, this document has been prepared to meet the objectives contained in the WDR Order. The document is divided into 13 sections, which closely align with the respective provisions contained in the WDR. Every section or subsection of each chapter addresses one of the key elements of the SSMP directive.
This document, plus other existing agency programs referenced herein constitute the SSMP for the City of Inglewood. By implementing the procedures contained in this SSMP, the occurrence of SSO should decrease or possibly be avoided throughout the City’s sanitary sewer collection system.
SECTION 3 - Goals

Section D.13 (i) - Goal: The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

3.1 Overview

This section describes the goals of the Sewer System Management Plan (SSMP), which is to provide a documented plan that describes all collection system activities and programs employed by an agency to ensure proper management of all collection system assets. Implementing an SSMP will ensure proper management, operation, and maintenance of all parts of the sanitary sewer system, ultimately helping to reduce and prevent SSOs, as well as mitigate any SSOs that do occur including meeting all applicable regulatory notification and reporting requirements.

Commitment to continual improvement will also ensure that the SSMP is both a living and sustainable document that is continually updated, revised, and tailored towards the City’s needs. The City is required to comply with the “State Water Resources Control Board (SWRCB), Order No. 2006-0030 DWQ” (Order) on General Waste Discharge Requirements for publicly owned sewage collection agencies having more than one mile of collection pipelines.

3.2 Purpose

This element describes the City’s stated goals of the SSMP and is intended to clarify the City’s desired level of service that it is providing to its customers. Typically, high level statements regarding the overall management of a system includes a vision and mission statement, as well as a statement of short and long term goals.

THE MISSION STATEMENT is the first step in the planning process to identify overall functions or missions of the organization. This broad statement of purpose is commonly known as the mission statement.

THE VISION STATEMENT is a clarifying phrase that states where the City is heading. It helps set the course of future decisions and direction.

A STATEMENT OF GOALS should include both short and long term commitments that will ultimately measure progress toward achieving and accomplishing both the stated Vision and Mission. Goals should be developed specific to the City’s desired level of service. Careful thought and planning should occur when developing the Goals, because these are measurable outcomes that can be touted if accomplished or criticized if not accomplished. The development of reasonable Goals is often a balancing act between budget and performance. Creating Goals that meet this balance is often difficult and always specific to individual communities.
3.3 Minimum Requirements

Goals that the City must commit to and are identified in the WDR include:

1. Create/develop a management, operation and maintenance plan and schedule to reduce preventable SSOs.
2. Respond to and mitigate all SSOs discharging from the City’s collection system.
3. Ensure adequate system capacity for the current and future needs of the City’s service area.
4. Establish measurable performance indicators and manage assets at lowest life cycle costs.
5. Provide accurate reporting of all SSOs as described by the Order.
6. Properly fund, manage, operate, and maintain, with adequately trained staff and/or contractors.
7. All parties involved, shall possess adequate knowledge skills and abilities necessary to ensure the proper management, operation, and maintenance of all parts of the sewage collection system owned and/or operated by the City of Inglewood.

The State Water Board also expects both a plan and schedule to be created by the City to ensure that an SSMP is developed in accordance with the time schedule identified in the WDR and will facilitate proper sanitary sewer system management, operation, and maintenance.

The goals of this SSMP are:

1. Collection system facilities are properly managed, operated, and maintained to eliminate preventable sanitary system overflows (SSOs);
2. Response measures are in place and that all feasible steps are taken to mitigate the impacts of SSOs to public health and the environment when they occur;
3. Reporting procedures are in place to notify the appropriate regulatory and health authorities of SSOs within the required time frames; and
4. SSO events, mitigation measures, and corrective actions are documented; and
5. City sewer system operators, employees, contractors, responders, or other agents are adequately trained and equipped to address an SSO event; and,
6. City sewer system is properly designed, constructed and funded to provide sufficient capacity to convey base flows and peak flows while meeting or exceeding applicable regulations, laws and generally acceptable practices relative to sanitary sewer system operations and maintenance.

The actions to be taken under the SSMP are:

1. Conduct planned and scheduled maintenance and training programs to minimize risk and the occurrence of SSO, in support of the SSMP goals including cleaning and CCTV inspection of all sewer lines. This includes cleaning all sewer lines every 18 months, all Hot Spots monthly and CCTV the entire sewer system every five (5) years.

2. When SSO’s do occur, respond to the reported site in a timely manner and undertake feasible remedial actions to contain overflow impacts, including stopping the flow from reaching the storm drain or water course, if possible; and,
3. Stop the overflow as soon as possible and limit public access into the overflow area to prevent public contact with any wastewater contamination; and,

4. Completely recover the overflow and return it to the sewer system, and clean up the contaminated area; and,

5. Gather and compile all pertinent information regarding the overflow event, investigate as necessary to determine probable cause, document findings, report to the appropriate regulatory agencies in a timely manner, and file the completed report; and,

6. Condition all development and capital projects to evaluate, design and construct sewer facilities to the city approved standards and criteria, and

7. Update the Sanitary Sewer Overflow Emergency Response Plan

8. Update the 2017 Sewer Master Plan

9. Perform needed rehabilitation of the sanitary sewer system to address capacity deficiencies as well as structural deficiencies, as identified in 2007 and the new Sanitary Sewer Master Plan Update

10. Implement all action items committed to in the Response Letter to the State Water Resources Control Board dated July 15, 2021
SECTION 4 - Organization

D.13 (ii) - Organization: The SSMP must identify:

a) The name of the responsible or authorized representative as described in Section J of this Order.

b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and

c) The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

4.1 Overview

This element of the WDR describes both the organizational structure of the City as well as activities, duties, and responsibilities for individuals and positions associated with the sanitary sewer system. This section should include typical positions and their associated activities, duties, and responsibilities.

4.2 Purpose

Clearly identifying specific roles and responsibilities within an organization will ensure a clear understanding of duties that must be performed, as well as training and skill sets that are associated with specific jobs throughout the agency.

4.3 Minimum Requirements

1. The name of the responsible or authorized representative as described in Section J of this Order.
2. The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and
3. The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Quality Control Board, and/or
State Office of Emergency Services (OES)).
4.4 Sewer System Management

The City of Inglewood is located in the County of Los Angeles just a few miles from the California coastline. It is bordered to the south by the City of Hawthorne and to the east, north, and west by portions of unincorporated Los Angeles County and the City of Los Angeles. The City had a population of 109,673 people, per the 2010 US Census. Additionally, the US Census estimates this number to have increased to 111,905 by the year 2014. The City’s Public Works Department manages the City’s sanitary sewer collection system.

The sewer collection system consists of about 145 miles of gravity sewer pipe ranging in size from 4 to 16 inches in diameter and approximately 3,100 manholes. The general direction of flow is from north to south and east to west. The majority of sewers tie directly into one of the Los Angeles County Sanitation Districts (LACSD) trunk sewers crossing through the City, located primarily in larger streets. There are approximately 203 connections to the LACSD, which convey City’s wastewater out of the City to the south and continue to flow by gravity to the LACSD Joint Water Pollution Control Plant located in the City of Carson for treatment and disposal of wastewater.

The sewers are primarily constructed of vitrified clay pipe with approximately 95 percent of the pipes sized at 8-inch in diameter. The majority of the existing sewer system was constructed before 1960.

Distribution of the City’s personnel is depicted in the organization chart presented in section 4.7.1 of this plan. These personnel provide engineering evaluation of existing and proposed sewer facilities, administer the City’s sewer service charge ordinance, review and permit new service connections or development projects, maintain facility record plans and administer preventive maintenance and sewer construction programs.

4.5 Authorized Representative

The City’s Director of Public Works is the authorized representative who is responsible for the execution of compliance actions required under the WDR. This includes, but is not limited to, signing and certification of all reports and correspondence as required under this order.

4.6 City’s Responsibilities

The City is required to apply for coverage under the WDR for facilities it owns. The City is required to prepare a comprehensive SSMP, and if it has not yet fully adopted applicable codes, local ordinances or resolutions governing the performance of items stipulated in the WDR, it will promptly undertake actions to adopt the legal means to do so.

The City Public Works Department (PWD) plays significant roles, jointly and separately, towards attaining the goals of the WDR. The degree of these collaborative efforts will vary from department to department depending on the degree of SSO related services the PWD is providing under various agreements.
4.7 Organization Chart and Responsibilities

The organization chart showing the structure and relationships of the City's administrative, management and field positions relative to sewer operations and maintenance (SO&M) is presented in Section 4.7.1 and the descriptions of responsibilities and support are presented in Sections 4.7.2 and 4.7.3
4.7.1 Organization Chart for the City's Sewer System Management Plan

City of Inglewood
Organizational Chart for Sanitary Sewer System Management

- **Mayor and City council**
  - Mayor: James T. Butts, Jr.
  - Council Members:
    - District 1: George W. Dotson
    - District 2: Alex Padilla
    - District 3: Eloy Morales, Jr.
    - District 4: Dionne Faulk

- **City Manager**
  - Artie Fields
  - 310-412-5301

- **Assistant City Manager/Public Works Director**
  - Louis A. Atwell
  - Legally Responsible Officer
  - 310-412-5333

- **Public Works Administration & Support**
  - 310-412-5333

- **Principal Engineer, Water Resources**
  - Thomas C. Lee
  - 310-412-5611

- **Storm Water Coordinator**
  - Lauren Amimoto
  - 310-412-5192

- **Inglewood SRI Inspectors**
  - Responsible for Sewer SSO & Storm Water
  - William Payne
  - Brian Ball
  - Jose Ramirez
  - 310-412-8825

- **Public Works Superintendent**
  - Responsible for Sewer System Maintenance & Operation
  - Harry Frisby, Jr.
  - 310-412-5586

- **Sewer Maintenance Crew**
  - Responsible for Sewer SSO & maintenance
  - Roosevelt Robinson - 310-412-5479
  - Maurice Parades - 310-502-8958
  - Fernando Reynoso - 310-999-8677
  - Troy Daniels - 310-901-6118
  - Edwin Monzon - 310-412-5479
4.7.2 Description of Responsibilities

The description of responsibilities or roles of each position especially as related to SSOs are as follows:

- **City Council** - Responsible for establishing new and amending existing ordinances and policies governing the municipal operations, and the operations of the city’s sanitary sewer system including the approving of all SO&M contracts and agreements within the community’s interest.

- **City Manager** - Responsible for the overall management and application of all legal and policy directives that relate to the city’s activities, including the operation and maintenance of all City departments.

- **Assistant City Manager/CFO** - Responsible for the management and application of all financial and policy directives that relate to the city’s sanitary sewer system.

- **Assistant City Manager/Director of Public Works** - Directs the accomplishment of statutory and policy criteria, within the scope of the City Council’s policy and legal requirements. Directs its execution, and evaluates work accomplished within his areas of responsibility, including the SO&M program. Also directs the planning, budgeting, design and construction of new and rehabilitation of existing sewage collection systems, and assists with claims and litigations against the City relative to public infrastructure.

- **Principal Engineer, Water Resources** - Responsible for planning, design, and construction of water, sewer, and storm drain CIP and monitoring of all related expenditures.

- **Stormwater Coordinator** - Responsible for SSO reporting and monitoring as well as NPDES compliance and program management for FOG

- **Stormwater Runoff Investigation (SRI) Staff** – Perform restaurant inspections and FOG monitoring as well as notifying the Sewer Division Staff of potential SSOs and helping with response measures necessary to minimize impacts to public health and the environment.

- **Public Works Superintendent** – Implements SSMP, measures SSMP effectiveness, oversees field operations, coordinates and schedules field activities, communicates SSMP effectiveness to the Public Works Director, recommends improvements to SSMP procedures

- **Sewer Maintenance Crew** – Preventative maintenance activities, report condition of City assets, mobilize and respond to notification of stoppages and SSOs, and mobilize sewer-cleaning equipment and by pass pumping equipment.

4.7.3 Chain of Communication for SSO Reporting

Once the City of Inglewood Public Works staff receives a complaint or information regarding a potential SSO event during working hours, that employee will immediately notify the Stormwater
Runoff Investigation (SRI) Unit and Sewer Division staff to respond to the SSO event. Once notified of the potential SSO event, the SRI Unit and Sewer Division will respond to the location and immediately implement the Sanitary Sewer Overflow Response Plan. The Response Plan provides goals and guidance for response measures necessary to minimize impacts to public health and environment in the event of an SSO. The Sewer Overflow Reporting Protocol, issued by the Los Angeles County Department of Public Health is administered by the SRI Unit.

4.7.4 SSO Reporting Procedures Flow Chart

This diagram will be updated to reflect changes in City’s practices and to address any issues and concerns by the State Water Resources Control Board.
Sanitary Sewer Overflow Response Plan

**Sanitary Sewer Overflow Categories**

- **Category 1:** All discharges of sewage resulting from a failure in the sanitary sewer system that:
  A.) equal or exceed 1,000 gal, or
  B.) result in a discharge to a drainage channel and/or surface water; or
  C.) discharges to a storm drainpipe that was not fully captured and returned to the sanitary sewer system

- **Category 2:** All other discharges of sewage resulting from a failure in the sanitary sewer system

- **Private Lateral Sewage Discharges:** sewage discharges caused by blockages or other problems within a privately owned lateral.

*If during hours then Inglewood Public Works Dept. is notified*

- Stormwater Runoff Investigation (SRI) crew is notified
- Communications Dispatch notifies appropriate sewer stand by crew member
- Sewer crew responds, contains and stops spill, cleans up any and all impacted areas, investigates and reports cause of spill and responsible party

*If after hours then Inglewood Communications Dispatch is notified*

- Communications Dispatch notifies appropriate sewer stand by crew member
- SRI contacts owner of private lateral to take responsibility to fix and avert cleanup costs, and reports spill on CIWQS

What category does the SSO fall into?

**Category 1 SSO:** EH&S is contacted for further investigation and response; SRI makes report to State OES and RWQCS and certifies report on CIWQS.

**Category 2 SSO:** SRI reports to State Water Board and certifies report on CIWQS.

**Private Lateral Sewage Discharge**
- SRI contacts owner of private lateral to take responsibility to fix and avert cleanup costs, and reports spill on CIWQS.
### 4.7.5 City's Contact Directory for SSO Responding and Reporting

<table>
<thead>
<tr>
<th>Responsible Party</th>
<th>Name</th>
<th>Telephone</th>
<th>After Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Manager</td>
<td>Artie Fields</td>
<td>310-412-5301</td>
<td></td>
</tr>
<tr>
<td>Director of Public Works / City Engineer</td>
<td>Louis A. Atwell</td>
<td>310-412-5333</td>
<td>424-225-0399</td>
</tr>
<tr>
<td>Public Works Superintendent</td>
<td>Harry Frisby Jr.</td>
<td>310-412-5586</td>
<td>310-901-6835 *</td>
</tr>
<tr>
<td>Stormwater Coordinator</td>
<td>Lauren Amimoto</td>
<td>310-412-5192</td>
<td>626-376-5907</td>
</tr>
<tr>
<td>Public Works Supervisor-Sewer Crew</td>
<td>Roosevelt Robinson</td>
<td>310-412-5479</td>
<td>310-259-9969 *</td>
</tr>
<tr>
<td>SRI Unit</td>
<td>Jose Ramirez</td>
<td>310-412-4200</td>
<td>310-901-8024 *</td>
</tr>
<tr>
<td>SRI Unit</td>
<td>Brian Ball</td>
<td>310-412-4200</td>
<td>310-901-4631 *</td>
</tr>
<tr>
<td>SRI Unit</td>
<td>Doug Payne</td>
<td>310-412-4200</td>
<td>310-901-5203 *</td>
</tr>
<tr>
<td>Sewer Division (Crew Members)</td>
<td>Edwin Monzon</td>
<td>310-412-5479</td>
<td>310-901-6118 *</td>
</tr>
<tr>
<td></td>
<td>Fernando Reynoso</td>
<td>310-999-8677 *</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Troy Daniels</td>
<td>310-901-6118 *</td>
<td></td>
</tr>
<tr>
<td>Sewer Division-Lead</td>
<td>Mauricio Parades</td>
<td>310-650-8739 *</td>
<td></td>
</tr>
<tr>
<td>Sewer Standby</td>
<td></td>
<td>310-901-5518 *</td>
<td></td>
</tr>
<tr>
<td>Public Works Department</td>
<td>Receptionist</td>
<td>310-412-5333</td>
<td></td>
</tr>
<tr>
<td>Communications Dispatch</td>
<td>24 Hour Dispatch</td>
<td>310-421-8771 *</td>
<td></td>
</tr>
<tr>
<td>LA County DPW</td>
<td>24 Hour Dispatch</td>
<td>626-458-4357 *</td>
<td></td>
</tr>
<tr>
<td>LA County Health Department</td>
<td>213-974-1234</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LA County Flood Control Dist.</td>
<td>626-445-7630</td>
<td></td>
<td></td>
</tr>
<tr>
<td>County Sanitation Districts of LA</td>
<td>562-699-7411</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RWQCB</td>
<td>213-567-6600</td>
<td></td>
<td></td>
</tr>
<tr>
<td>State OES</td>
<td>800-852-7550</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Can be reached by this number both during and after working hours.
SECTION 5 - Legal Authority

D.13 (iii) **Legal Authority:** Each Enrollee must demonstrate, through sanitary sewer system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

(a) Prevent illicit discharges into its sanitary sewer system (Examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);

(b) Require that sewers and connections be properly designed and constructed;

(c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;

(d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and

(e) Enforce any violation of its sewer ordinances

5.1 Overview

This chapter is intended to identify and describe the necessary legal authority that an agency must have in order to implement SSMP plans, programs, and procedures. Regulatory mechanisms that are used by cities quite often include City Ordinances, Codes, and Resolutions, State and Federal Laws, Licensing and Permitting Processes, Memorandum of Agreements, Contractual Agreements, as well as other programmatic mechanisms necessary to carry out asset management activities.

5.2 Purpose

The basis of all authority to manage, operate, and maintain agency’s infrastructure is derived from documents adopted by its elected board or council. In order to ensure that the City has the proper legal authority established to implement and enforce all of the programs required by the WDR, the City must first establish necessary legal authority to do so.
5.3 Minimum Requirements

The SSMP must include the legal authority, through sewer use ordinances, service agreements, or other legally binding procedures, to:

a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);

b) Require that sewers and connections be properly designed and constructed;

c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;

d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and

e) Enforce any violation of its sewer ordinances.

5.4 Statutory Authority

Pursuant to the California Government Code, Sections 37100 and 54350, the City Council, as the local legislative body, may by ordinances and resolutions make and enforce all rules and regulations necessary for the administration of the city’s SO&M plan. Such actions include, but are not limited to, the design, construction, cleaning, repair, reconstruction, rehabilitation, replacement, operation, maintenance, discharges into, blockage of, access to, and violation enforcement pertaining to the sanitary sewers within the City’s System. Consistent with the law, several ordinances have been established by the City Council to govern all aspects of the SO&M plan. The legal authorities for the specific areas stipulated in the WDR are discussed below.


5.4.1 Authority to prohibit illicit discharges into the sewer system

IMC, Chapter 10, Article 17, provides control measures to prohibit illicit discharge of FOG. However, currently there are no specific language in IMC related to other types of illicit discharges to the public sewer system of the City, including storm water, surface drainage, chemicals, flammables, corrosive substances, solids, debris, etc., that might cause damage, clog, obstruct, necessitate or require excessive repair or cleaning of the sanitary sewer system.

The City will be amending the IMC to add language prohibiting other non-FOG related illicit discharges to the public sewer system, including storm water, surface drainage, chemicals, flammables, corrosive substances, solids, debris, etc.

5.4.2 Authority to require sewers and connections be properly designed and constructed

IMC, Chapter 10, Article 7, there is "General" language pertaining to the "Legal Authority" to require proper design and construction of “sewer connections”. Also, the City does have its own design guidelines for the sewer system, which relies on the APWA standards and LA County Department of Public Works Standards.
The City will add specific language related to the construction of sewer lines and manholes to prevent I/I in the system. In addition, The City will update its ordinance to add a requirement that all new sewer construction must be cleaned and televised before being accepted by the City.

5.4.3 Authority to ensure access for maintenance, inspection, or repairs

The City will be amending the IMC to add requirement to its ordinance to ensure access authority for maintenance, repair and inspection of all collection system assets within the City of Inglewood.

5.4.4 Authority limiting discharge of FOG and other debris that may cause blockage

Chapter 10 of the Plumbing Code provides the Building Official (or other Authorized Authority) with legal authority to require installation of interceptors (clarifiers) where waste flow conditions necessitate the proper handling of the liquid waste stream flow to protect the sewer system and the public (commonly at food service establishments, processing facilities, industrial facilities, etc., that generate grease, oil, grit, acids, alkaline or flammable wastes). This authority would apply at any facility that generates FOG in an amount that will damage or otherwise increase the maintenance costs of the wastewater collection system.

5.4.5 Legal Authority to Enforce any Violation of Sewer Ordinances

IMC Sections 10.227, entitled “Enforcement” defines the authority to both issue notifications to correct, as well as enforce provisions of the City Code, including any violations of the codes pertaining to the illicit discharge of FOG.

The City will add requirement to its ordinance to ensure authority for assessing fines for misdemeanors or infractions including other non-FOG related illicit discharges to the public sewer system. As such, specific violations will be delineated to facilitate establishing the authorization necessary to issue violation notices and fines specific to the wastewater collection system, including passing on to the culpable parties fines and penalties that the City may incur for the negligent and intentional acts of others.

5.4.6 Legal Authority to Fund the operations & maintenance of the sewer system

IMC, Chapter 10, Article 7, relative to connection charges, charges for sewer maintenance, basis for levy of charge, and levy of annual service charge amount establishes the basis for a financial plan to ensure operations and maintenance or the capital replacement or rehabilitation of the community sewer system.
SECTION 6 - Operation and Maintenance Program

D.13 (iv) **Operation and Maintenance Program:** The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee’s system:

(a) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities;

(b) Describe routine preventative operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;

(c) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;

(d) Provide training on a regular basis for staff in sanitary sewer system operations and maintenance and require contractors to be appropriately trained; and

(e) **Provide equipment and replacement part inventories, including identification of critical replacement parts.**
6.1 Overview

This section of the SSMP describes how the City will operate and maintain the sanitary sewer system within its jurisdiction. It will involve the development and implementation of several major programs and activities including the production of maps, maintenance and cleaning schedules, and a comprehensive rehabilitation and replacement plan.

6.2 Purpose

Through assessment of the present condition of the sanitary sewer system, deficiencies and defects within the system can be identified so that these issues can be targeted and prioritized for rehabilitation. This program of preventative maintenance will help to ensure that costly catastrophic system failures are preempted and will serve to reduce the amount of SSOs to be reported within the City.

6.3 Minimum Requirements

At a minimum, each enrollee must:

1) Create and maintain an up-to-date map of the sanitary sewer system within an Enrollee’s jurisdiction;
2) Develop and implement a Preventative Maintenance Program that describes preventative operation and maintenance activities and a system to document scheduled and conducted activities;
3) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and rehabilitation actions, including regular inspections of the conditions within the system;
4) Provide regular training for staff and contractors;
5) Provide equipment and replacement part inventories.

6.4 Personnel

The City of Inglewood has a Sewer Maintenance Division consisting of four (4) full time employees who are responsible for maintaining the sewer connection system. Their responsibilities include cleaning the system on a regular basis, clearing and cleaning hot spots, and responding to sanitary sewer overflows as well as calls from residents.

6.5 Vehicles and Equipment

The Sewer Maintenance Division Section performs day-to-day operations and maintenance activities using assigned vehicles and equipment. The equipment includes, but is not limited to:

- 1 combination Vactor Truck
- Ford Pickup Truck-F250 (#1605)
- GapVac- Vactor Truck - Peterbilt
- Ford F-series- Water Truck
- Ford F-600 - Rodding Truck
- Ford E-350 CCTV camera Van
- Easement Machine
- New Vehicle request
• New Pickup truck
• Combination Vactor/Catch Basin Cleaner Truck.
• Three Computer Tablets.

6.6 Mapping and Geographic Information Systems

The City of Inglewood utilizes a map of its wastewater collection system stored in Geographic Information System (GIS) format. GIS is a computer system capable of assembling, storing, manipulating, and displaying geographically referenced information (i.e. data) according to their location. The user can select a sewer and access all available information based on the selection. This system is a powerful tool when used to quickly access critical information during an emergency response. The GIS Section is responsible for maintaining the Sewer Database. A map of the entire sewer collection system is included as an Attachment following this Section of the report.

6.7 Preventative Maintenance (PM) Program

A comprehensive maintenance program is an important tool in assuring reliable system operation. The City of Inglewood Sewer Maintenance Division is assigned to clean the sewer lines throughout the City on a daily basis and in addition, respond to any Sanitary Sewer Overspills that may occur. There are approximately 145 miles of sewer pipeline consisting of gravity sewer lines, and no City owned pumping stations. There are two (2) pumping stations in the City which belong to the Los Angeles County Sanitation Districts. The Sewer System is mapped out in a grid format, which the City uses to perform its on-going operations and maintenance. The City has established a new level of service for cleaning of its sanitary sewer lines with a goal of jetting and cleaning of the entire sewer system every 18 months. Additionally, City will perform a comprehensive manhole inspection as part of its update of sewer master plan and I/I Study.

The City will be implementing a proactive sewer rehabilitation program utilizing its sewer funds. These will include prioritizing and replacing lines that have been identified as structurally deficient, through its previous CCTV program. The City completed CCTV inspection of 91 miles of sewer lines (62 percent of the system) in the year 2008.

Additionally, City will be initiating a new CCTV program and condition assessment, for the remaining portion of its sewer lines so that additional rehabilitation for these lines can be identified and added to the existing CIP for structurally deficient sewer lines. The City has set aside $0.3 M to complete its CCTV program for the remainder of the system. If the problem is related to a private lateral, the responsible resident is notified. The City has also established a level of service for performing television inspection of its entire sewer system every five (5) years.

The Sewer Maintenance Division responds in a timely matter to all emergency calls regarding Sanitary Sewer Overflows (SSOs) and sewage spills from private properties following procedures detailed in Chapter 6 – Sanitary Sewer Overspill Response Plan of this report. The City has also implemented a relining program over the last 19 years. Approximately 10 miles of sewers and 42 manholes have been relined. Relining techniques include cured-in-place pipe (CIPP) lining PVC slip-lining. The locations of the relined sewers and manholes were
based upon the number of blockages, complaints from residents, knowledge of City personnel, age of pipes, and various other problems. The areas with the most problems were considered as the highest priority.

The Sewer Maintenance Division staff will also re-start its root control program by jetting or rodding. Additionally use of root killing chemicals will also be re-instated and will be provided to residents for use in private laterals.

6.8 Rehabilitation and Replacement Program

The City of Inglewood maintains a proactive Rehabilitation and Replacement Program to 1) ensure the timely repair of sewer pipes in imminent danger of failure or blockage; 2) ensure the long range sustainable replacement of obsolete assets; and 3) improve system performance and reduce spills caused by pipe defects or mechanical failures. The Rehabilitation and Replacement Program to date is shown in the following table.

Additionally the City has allocated $1.4 M for the immediate rehabilitation of existing identified structural deficiencies. The following table shows the CIP projects completed to date.

<table>
<thead>
<tr>
<th>Sewer projects:</th>
<th>Sl. No.</th>
<th>Fiscal Year</th>
<th>Name of Project</th>
<th>Project Cost</th>
<th>Work Done</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2009-2010</td>
<td>Sewer Point Repairs at Various Locations in the City</td>
<td>$270,000</td>
<td>53 Locations</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>2010-2011</td>
<td>Edward Vincent Park Sewer Improvement Project</td>
<td>$140,799</td>
<td>365 LF + 2 sewer manholes</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>2010-2011</td>
<td>Storm Drain Improvement Project</td>
<td>$130,900</td>
<td>9 repair locations</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>2011-2012</td>
<td>Sewer Lining Phase 1</td>
<td>$293,422</td>
<td>8697 LF + 35 repair locations</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>2012-2013</td>
<td>Storm Drain Improvement Project 2</td>
<td>$129,200</td>
<td>759 LF (in 4 different street sections) + 1 cross gutter +</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>2012-2013</td>
<td>Sewer Lining Phase 2</td>
<td>$335,432</td>
<td>9000 LF + 17 repair locations</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>2012-2013</td>
<td>Ballona Creek Catch Basin Insert Project</td>
<td>$109,721</td>
<td>204 catch basin inserts</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>2013-2014</td>
<td>Storm Drain Improvement Project Phase 3</td>
<td>$105,700</td>
<td>320 LF</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>2013-2014</td>
<td>Sewer Lining Phase 3</td>
<td>$300,000</td>
<td>8,300 LF</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>2013-2014</td>
<td>Sewer Point Repairs Phase 2 at Various Locations in the City</td>
<td>$973,000</td>
<td>141 locations</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>2014-2015</td>
<td>Ballona Creek Catch Basin Insert Project - Phase 2</td>
<td>$79,900</td>
<td>150 catch basin inserts</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>2015-2016</td>
<td>Sewer Point Repair Project Phase 3</td>
<td>$375,000</td>
<td>16 locations</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>2019-2020</td>
<td>Sewer Point Repair</td>
<td>$111,772.18</td>
<td>110 LF 8-inch VCP Sewer &amp; 4 Laterals</td>
<td></td>
</tr>
</tbody>
</table>

Pipe Materials: Vitrified Clay Pipe (VCP)
The City has also set aside approximately $1.2 M for the immediate rehabilitation of existing identified hydraulically deficient sewer lines (identified in the 2007 Sewer Master Plan) as well as $0.5 M to perform a comprehensive Sewer Master Plan and $0.3 M for Infiltration/Inflow study.

Also, in the short term, the City will continue its inspection and maintenance of the siphon on monthly basis. However, the City plans to re-engineer the sewer system at that location (Imperial and Doty) and work on elimination of the existing siphon.

6.9 Training Program

The City of Inglewood has implemented regular training for its staff as well as sending its staff to various training programs. These include Course held by the National Stormwater Center. This course specifically for California MS4 personnel. This two day course focuses on the six control measures of the small MS4 permit. This conference was held in August 2015.

Also, staff attended the workshop for wastewater collection system professionals (March 2015) on ways to be in compliance with the new WDR requirements. This workshop also provided practical solutions for refining and implementation of your overall sanitary sewer management plan (SSMP).

Additionally, Certification preparation class for CWEA collections Grades 1-4 were attended by City staff on May 27, 2015.
SECTION 7 - Design and Performance Provisions

D.13 (v) Design and Performance Provisions:
(a) Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and
(b) Procedures and standards for inspecting and resting the installation of new sewers, pumps and other appurtenances and for rehabilitation and repair projects.

7.1 Overview

Development of standards for the design, construction, inspection, testing and acceptance of new, rehabilitated, or repaired portions for the collection system is key in ensuring a safe, and reliable collection system. Even if the City has existing standards in place a comprehensive review of these is required to establish meeting the SSMP criterion.

7.2 Purpose

This requirement will create continuity within the system, preventing inconsistencies from leading to hydraulic deficiencies which can result in a sanitary sewer overflow.

7.3 Minimum Requirements

At a minimum, each enrollee must:

1) Develop and implement consistent design and construction standards for the installation of new sanitary sewer systems, pump stations, other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and
2) Develop and implement procedures and standards for inspecting the installation of new sewers, pumps and other appurtenances and for rehabilitation and repair projects.

7.4 Design and Construction Standards and Specifications

The City of Inglewood has established standards and guideline to ensure that its wastewater collection systems facilities are properly designed and constructed. These facilities include, but are not limited to, gravity sewers and other related items.

Design guidelines for the construction and rehabilitation of gravity sewers, force mains, and other appurtenances include, but are not limes to, environmental record searches, alignment selection, hydraulic analysis, capacity, pipe design, survey, substructure verification, and soil testing. Criteria for zoning, friction coefficients, minimum and maximum slopes and velocities, manhole spacing and materials are outlined in the design specs tailored for that facility.
Design criteria are established to ensure that the sewer collection system can operate efficiently under all flow conditions. At a minimum, all pipes should be 8 inches or larger in diameter and the velocity of flow should be greater than 2 feet per second at average flow.

For each design project, the City of Inglewood develops Contract Documents that are specifically tailored for that facility. For sewer projects, the City relies upon the Standard Specifications for Public Works construction (Greenbook) and the American Public Works Association Standards.

To further assure that wastewater collection facilities are properly designed and constructed, design of all project drawings, by both in-house and outside consultants, follow an established review procedure. Licensed engineers oversee and/or perform all facility design. Project drawings are checked and reviewed by licensed engineers prior to approval for construction.

7.5 Inspection and Testing Procedures and Standards

Installation of all new sewer pipelines, and point repairs, are inspected in accordance with American Public Works Association Standards and City Standards in regards to backfill requirements.
D. 13 (vi) Overflow Emergency Response Plan - Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

(a) Proper notification procedures so that the 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 to 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 MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or 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.

8.1 Overview

This element of the SSMP consists of both the contingency plan and the procedures for responding to an overflow event.
8.2 Purpose

Proper procedures must be established and put into practice in order to minimize the negative effects of an SSO. This section requires the implementation of a concise set of procedures that will seek to ensure that all negative effects of an SSO on public health and the environment are minimized. Proper overflow response procedures are one of the main reasons for the development of the WDRs for SSOs.

8.3 Minimum Requirements

At a minimum, each enrollee must include in its overflow emergency response plan:

1) Proper notification procedures for primary responders and regulatory agencies;
2) A program to ensure appropriate response to all overflows;
3) Procedures to ensure prompt notification of appropriate officials or other potentially affected agencies for reporting purposes;
4) Procedures to ensure that all appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are properly trained;
5) Procedures to address emergency operations
6) A program to ensure all steps are taken to contain untreated wastewater and prevent discharge of untreated wastewater to waters of the United States.

8.4 Sanitary Sewer Overflow Response Plan Goals

The City of Inglewood’s goals regarding overflow response are:

- Respond to the scene within one hour of notification of an overflow and assess the situation. Promptly notify the responsible agency if the overflow was not caused by a problem within the City of Inglewood’s system.
- Prevent the overflow from reaching the storm drain, if possible.
- Limit public access to the overflow area to prevent public contact with wastewater and any areas contaminated by wastewater.
- Stop the overflow as soon as possible, preferably within one hour of arriving on-site.
- Completely contain the overflow as close as practical to the overflow location to prevent or minimize any environmental impact. Completely recover the overflow and return it to the sewer system.
- Clean up the area contaminated by the overflow.
- Gather and compile pertinent information pertaining to the overflow, simultaneous with response efforts, and notify appropriate regulatory agencies of the overflow and response status as soon as practical.
- Conduct investigations to determine the probable cause of the overflow, document the events during the overflow and response activities, identify and implement measure to prevent recurrence.

8.5 Sanitary Sewer Overflow Response Plan

Once a City of Inglewood employee receives a complaint or information regarding a potential SSO event, that employee shall immediately notify the City of Inglewood Public Works Department. Once notified of a potential SSO event, the City of Inglewood Public Works Department notifies the Sewer maintenance Division and they are the primary responder to the site. The Sewer Maintenance Division immediately implements its Sanitary Sewer Overflow Response Plan (Response Plan). The Response Plan provides goals and guidance for the
response measure necessary to minimize impacts to public health and the environment in the event of a sanitary sewer overflow. The crew responding to an overflow emergency is required to stop the overflow, contain it as much as possible, limit access to the contaminated area, and ensure that the facility or area is cleaned up and returned to normal operation. Residents or businesses in the immediate vicinity of the overflow are to be informed of the cause of the problem and the remedial action taken.

During business hours, emergency calls are received by the operator/staff, who will call and dispatch the nearest sewer maintenance crew to the problem site. For after hour emergencies, the Police Department dispatcher will contact the ‘standby’ sewer maintenance worker, in the order listed on the emergency home telephone list. The on-call worker who receives the emergency call will investigate the complaints and take appropriate action, including immediate dispatch of a standby crew with necessary equipment to take care of the problem, or refer the call to other agencies if the problem is found to be under another’s jurisdiction.

The County Health Department is notified of all overflows and if the overflow reaches the storm drain system, the Regional Water Quality Control Board and the State Office of Emergency Services are notified. The Flood Maintenance District (FMD) is notified of all overflows that discharge into the storm drain system. The role of FMD is to assist in tracing and capturing the spill as much as possible before it reaches the Waters of the United States. The relevant data about the overflow, such as location, volume, agencies notified, etc. is recorded in field report forms and later stored in the computer. All field personnel are trained to be conversant with these procedures and to accurately report of SSO incidents.

The City will also take steps to address 15-day certification requirement for individual Category 1 SSO. All Public Works personnel with CIWQS reporting responsibilities are now aware of this very important element and this issue has also been documented in the update of the City’s SSMP.

This along with other procedural and field training issues will be addressed and emphasized during the implementation phase of the updated SSMP which is scheduled to begin immediately. Finally, the City will develop written policies and Standard Operating Procedures to go along with the classroom training of its staff.

8.6 Procedure to ensure that staff and contractors are aware of and are appropriately trained to follow Emergency Response Plan

The SO&M Emergency Response Plan will be available to key personnel who are responsible for managing or responding to SSO’s. Copies of the City’s instruction manuals are available to field crews and engineers at the office who manage or have the role of preparing SSO reports to regulatory agencies. The experience of the Contractors’ emergency response team plays a very important part in the selection process during the selection of the City’s as needed Emergency Contractors.
8.7 Procedures to address emergency operations such as traffic and crowd control and other necessary response activities.

The Sewer Crew personnel and employees of the emergency response contractors who are retained for SSO responses are well trained in traffic and crowd control. The City’s vehicles are well equipped with traffic and crowd control tools, including orange traffic control cones, yellow tape, flashing lights, orange uniforms, first-aid supplies, etc.

8.8 Program to eliminate or minimize discharge of SSO into Waters of the United States

The Sewer Crew personnel and emergency contractors' crews are properly trained on methods and procedures to prevent or limit the amount of SSO into Waters of the United States and how to mitigate their impacts. Some of the methods include the use of sand bags to contain SSO's, absorbent tube socks to prevent SSO discharge into storm drain catch basins, and the use of vacuum trucks to suck up contained spills and dump effluent back into the collection system at other safe locations. Sewer Crew personnel have the reduction of response time for SSO as one of the major goals. Reducing response time would significantly limit the amount of SSO that reaches the Waters of the United States.

8.9 SSO flow estimation tables and photographs

City crews have been provided with flow estimation pictures and tables that help in estimating sewer overflows.

The following chart shows the City’s current Sanitary Sewer Overflow Response Plan. City will be updating this Response Plan to ensure its adequacy, in Fall 2015.
Sanitary Sewer Overflow Response Plan

Sewer System Overflow (SSO) Occurs

- Witnessed by general public or City employee
- Do they know to report the SSO?
  - Yes
  - Stormwater Runoff Investigation (SRI) crew is notified
  - Communications Dispatch notifies appropriate sewer stand-by crew member.
  - If after hours then Inglewood Communications Dispatch is notified
  - Sewer crew responds, contains and stops spill, cleans up any and all impacted areas, investigates and reports cause of spill and responsible party.
  - What category does the SSO fall into?
    - **Category 1 SSO:** EH&S is contacted for further investigation and response; SRI makes report to State OES and RWQCB and certifies report on CIWQS.
    - **Category 2 SSO:** SRI reports to State Water Board and certifies report on CIWQS.
    - **Private Lateral Sewage Discharge:** SRI contacts owner of private lateral to take responsibility to fix and abate cleanup costs, and reports spill on CIWQS.

Sanitary Sewer Overflow Categories

- **Category 1:** All discharges of sewage resulting from a failure in the sanitary sewer system that:
  A. equal or exceed 1000 gal; or
  B. result in a discharge to a drainage channel and/or surface water; or
  C. discharges to a storm drainpipe that was not fully captured and returned to the sanitary sewer system.

- **Category 2:** All other discharges of sewage resulting from a failure in the sanitary sewer system.

- **Private Lateral Sewage Discharges:**
  Sewage discharges caused by blockages or other problems within a privately owned lateral.
SECTION 9 - FOG Control

D. 13 (vii) FOG Control Program - Each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. The plan shall include the following as appropriate:

(a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;

(b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;

(c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;

(d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;

(e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;

(f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and

(g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.
9.1 Overview

Under the Order, the City is required to evaluate its service area to determine whether a Fats, Oils, and Grease (FOG) control program is needed. If the City determines that a FOG program is not needed, it must provide justification for why it is not needed. If FOG is found to be a problem, the City must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system.

9.2 Purpose

FOG is generated in most types of restaurants and food service establishments during food preparation, food service, and kitchen clean up. If flushed down the drain, FOG can build up in pipes, pumps, and equipment -- causing significant problems in the sanitary sewer system, including line blockages. Blockages can lead to sewer overflows, posing environmental and public health hazards. Understanding and controlling discharges of FOG will greatly reduce potential liability of SSOs and efforts required to keep lines clean.

The key to reducing FOG in the sanitary sewer system includes both a good source control program, as well as preventative maintenance to ensure FOG that does build up within the system is cleaned before significant buildup can occur. Additionally, understanding your collection system and the type of discharges within the service area is paramount to the strategic implementation of a FOG program.

9.3 Minimum Requirements

At a minimum, each enrollee must:

1) Determine if FOG is (or could be) an issue within the service area. (If FOG is found not to be an issue, then justification must be provided).

2) Create a plan and schedule for a public education outreach program that promotes proper disposal of FOG;

3) Develop a plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;

4) Ensure that the appropriate legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;

5) Require the installation of grease removal devices (such as traps or interceptors), including design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;

6) Make sure that the agency has the authority to inspect grease producing facilities, enforcement authorities, and whether the agency has sufficient staff to inspect and enforce the FOG ordinance;

7) Identify sections of the sanitary sewer system that are subject to FOG blockages and establish a cleaning maintenance schedule for each section; and

8) Develop and implement a source control and/or cleaning program for all sources of FOG discharged to the sanitary sewer system.
9.4 Public education and outreach program

City proactively reaches out to users of its sewer system regarding the community’s FOG source control program. Information on proper disposal of FOG and other SSO prevention measures, including installation of grease traps, backwater valves, sewer lateral maintenance, etc. is disseminated through publication of notices, on a usual schedule. These notifications provide descriptions of grease control efforts that can be undertaken by businesses. Additionally, the PWD utilizes personal contacts with business owners, by its SRI staff, as conditions warrant. These methods are usually effective in relaying information on proper disposal of FOG and other SSO prevention methods to the community.

Additionally, other effective ways to communicate with the public will be developed. These include expanded use of the City’s home web page, use of announcements over radio and local cablevision and other aggressive means. Exchanges of outreach information between agencies, is another beneficial tool.

FOG in the local sewer system can be a prime contributor to an SSO and its corresponding health and safety impacts. Related health and safety issues can also result from the discharge of pharmaceuticals and pesticides into the sanitary sewer system. Although not usually a causative factor in sewer overflows, these chemicals can be toxic and have disruptive environmental and biological effects. Discharges of such chemical compounds into the sewers should also be avoided and will be addressed in the education and outreach program.

9.5 Disposal method and schedule for FOG generated within the system service area

Solidified FOG, found in the public sewer system during regular scheduled cleaning operations or clearing of a blockage, is trapped, collected and taken to an available local rendering company or qualifying dump bin (site). All solid debris (FOG, roots, grit, etc.) collected from the system are taken to approve FOG disposal facilities. FOG in liquid form is flushed down by hydro jetting to designated treatment facilities for disposal.

9.6 The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG.

The legal authority to prohibit illicit discharges (eg. FOG, etc.) into the sewer system is discussed in Section 5 of this document. Requiring grease interceptors at FSE to prevent the discharge of grease to the public sewer system and educating the public on proper disposal methods for FOG are also discussed in this chapter. Discharges from industrial classification facilities are usually controlled under the terms of an industrial wastewater discharge permit, which is issued and monitored by the local wastewater agency.

9.7 Requirements to install grease removal devices, design standards, maintenance, BMP’s, record keeping and reporting requirements.

The City Building Official and/or County Health Officer is authorized to monitor and enforce the terms of the Plumbing Code and the Public Health Code, respectively. This includes domestic waste disposal from residential and commercial facilities. The City Code prohibits the discharge of "any material which may create a public nuisance, or menace to the public health or safety, or which may pollute underground or surface waters, or which may cause damage to any storm-drain channel or public or private property." If during inspection of the
sanitary sewer system, SRI personnel determine that a FOG related problem exists and is traceable to a domestic sewage source of such character that is not satisfactory, under the City Code, pretreatment could be required or the discharge required to be eliminated. Domestic waste containing FOG can lead to SSO which are public nuisances, and California Health and Safety Code Division 5, Part 3, Chapter 6, Article 2 can also be used to impose appropriate domestic sewage discharge requirements. The effectiveness of any grease removal devices are dependent upon their routine maintenance and monitoring/inspection for conformance with its intended purpose. Regular inspection and maintenance activity logging with quarterly reporting are required and are verified by City staff as part of the Industrial/Non-Domestic Waste Permit inspections.

9.8 Authority to inspect grease producing facilities, to enforcement, and evidence of adequate staffing to inspect and enforce the FOG ordinance.

As discussed in Section 5 of this document, the City has legal authority to inspect and enforce the local FOG ordinances. City has adequate staff to conduct inspections of the few pre-treatment facilities at the permitted FSE connected into the city sewer system. The funding mechanism now in place allows for increases in permit and other services charges if necessary to hire additional staff.

9.9 Cleaning schedule for identified FOG prone sewer segments

Experience has shown that FOG contributes to about 50% of the total SSO events that occur in a community sewer system. The remaining 50% is usually attributable to root intrusion into the system and other structural causes. As indicated in Section 6 of this document, FOG prone sections of City’s collection system, otherwise called "hot spots," are identified during routine maintenance operations and investigation of stoppages resulting in a SSO event. These “hot spots” are typically cleaned by hydro jetting and rodding or cutting if roots are encountered.

The best way to combat roots in sewer lines is to develop and utilize an integrated root control program. City will utilize its GIS system to document location of system defects including roots to address this problem systematically. Additionally, the City will employ BMPs including root cutting and the use of chemicals to control this problem. Finally, utilizing the aforementioned GIS mapping, the City will also incorporate the worst segments for incorporation into its CIP and eventual rehabilitation/replacement.

Those portions of the system found to have persistent FOG problems are inspected and cleaned more frequently, depending on the magnitude of the problem. Furthermore, segments of the collection system with persistent FOG problems are referred to the DPW for additional evaluation and corrective actions.

9.10 Source control measures developed and implemented for “hot spots”

Each “hot spot” cause and condition is not the same. For each identified problem location, the means of effective maintenance is noted on the respective “hot spots” list for review and regular follow-up action by the sewer maintenance crews. The activities can be amended as needed.
9.11 Action Items

The City will implement a targeted program to address this issue proactively, as described below:

a) A FOG source control program plan will be developed with targeted field visits by the City's SRI inspectors to document and issue citations to FSE’s that do not have grease interceptors.
b) Bi-lingual (English and Spanish) public outreach brochures will be developed that will also include a list of City approved FOG disposal sites.
c) SRI inspectors will be split into teams of one to increase the volume and frequency of their inspections.
d) City will map, in GIS, the location of sewer lines that are prone to heavy FOG build-up and will develop an intensified Enhanced Cleaning program for them.
e) SRI inspectors along with Public Works' engineering staff will monitor the above items and develop KPIs to track the success of the aforementioned activities and to make needed adjustments.
**SECTION 10 - System Evaluation and Capacity Assurance**

**D. 13 (viii) System Evaluation and Capacity Assurance**

**Plan:** The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

(a) **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;

(b) **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and

(c) **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.

(d) **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14.
10.1 Overview

This element of the SSMP includes several major programs and activities regarding development of a capital improvement plan and hydraulic analysis. Most of the requirements would be satisfied by a recent collection system master plan.

10.2 Purpose

An important step in attempting to minimize the amount of SSOs in a given system, one must determine how the system will react to different conditions and stresses. Once this is achieved, City officials can identify areas in need of improvement and prioritize projects for a capital improvement program.

10.3 Minimum Requirements

At a minimum, each enrollee must:
  a) Describe the methods used to identify areas of the sanitary sewer system that lack the sufficient capacity to convey an appropriate peak flow;
  b) Establish consistent design criteria;
  c) The identification of capacity needs and the approach used to take the results of the capacity evaluation to produce a prioritized list of capacity improvement projects; and
  d) The development of a project schedule that addresses both condition-related and capacity-related projects.

10.4 System Evaluation

To assess the adequacy of the existing sewer system, an updated Sewer Master Plan will be done in Fall 2015 which will include an updated hydraulic evaluation of the entire sewer system.

10.5 Adequate Capacity

City’s Public Works Department is the first line of defense in ensuring that the public sewer infrastructure is adequately planned, sized, correctly designed and easily maintainable. PWD legal authority to perform this important task is set forth in the multiple documents discussed in Section 5 and as detailed below.

For any new or expanded sewage discharges, the city requires completion of a sewer capacity study, by a registered engineer, prior to giving approval for projects that can affect the capacity of the public sewer system. The completed study will analyze the capacity in the existing system and will set forth mitigation requirements for the applicant to ensure adequate capacity. The study will also justify the sizing of proposed lines to accommodate the peak flows from all areas tributary to the mainline sewer under consideration or pumping station, now and in the future.

The approved capacity study is referenced directly by the city’s plan checker when design plans for the new infrastructure are submitted to assure adequate capacity. All proposals for new connection to existing sewer must also comply with the DPW's policies for managing available sewer capacity.
10.6  CIP Schedule

An updated sewer CIP will be done upon completion of the new Sewer Master Plan update, and added to this document.

Exhibit 1, below shows the list of completed CIP projects from the 2007 Sewer Master Plan.

<table>
<thead>
<tr>
<th>Sl. No.</th>
<th>Fiscal Year</th>
<th>Name of Project</th>
<th>Project Cost</th>
<th>Work Done</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2009-2010</td>
<td>Sewer Point Repairs at Various Locations in the City</td>
<td>$270,000</td>
<td>53 Locations</td>
</tr>
<tr>
<td>2</td>
<td>2010-2011</td>
<td>Edward Vincent Park Sewer Improvement Project</td>
<td>$140,799</td>
<td>365 LF + 2 sewer manholes</td>
</tr>
<tr>
<td>3</td>
<td>2010-2011</td>
<td>Storm Drain Improvement Project</td>
<td>$130,900</td>
<td>9 repair locations</td>
</tr>
<tr>
<td>4</td>
<td>2011-2012</td>
<td>Sewer Lining Phase 1.</td>
<td>$293,422</td>
<td>8697 LF + 35 repair locations</td>
</tr>
<tr>
<td>5</td>
<td>2012-2013</td>
<td>Storm Drain Improvement Project 2.</td>
<td>$129,200</td>
<td>759 LF (in 4 different street sections) + 1 cross gutter +</td>
</tr>
<tr>
<td>6</td>
<td>2012-2013</td>
<td>Sewer Lining Phase 2.</td>
<td>$335,432</td>
<td>9000 LF + 17 repair locations</td>
</tr>
<tr>
<td>7</td>
<td>2012-2013</td>
<td>Ballona Creek Catch Basin Insert Project</td>
<td>$109,721</td>
<td>204 catch basin inserts</td>
</tr>
<tr>
<td>8</td>
<td>2013-2014</td>
<td>Storm Drain Improvement Project Phase 3.</td>
<td>$105,700</td>
<td>320 LF</td>
</tr>
<tr>
<td>9</td>
<td>2013-2014</td>
<td>Sewer Lining Phase 3</td>
<td>$300,000</td>
<td>8,300 LF</td>
</tr>
<tr>
<td>10</td>
<td>2013-2014</td>
<td>Sewer Point Repairs Phase 2 at Various Locations in the City</td>
<td>$973,000</td>
<td>141 locations</td>
</tr>
<tr>
<td>11</td>
<td>2014-2015</td>
<td>Ballona Creek Catch Basin Insert Project - Phase 2.</td>
<td>$79,900</td>
<td>150 catch basin inserts</td>
</tr>
<tr>
<td>12</td>
<td>2015-2016</td>
<td>Sewer Point Repair Project Phase 3.</td>
<td>$375,000</td>
<td>16 locations</td>
</tr>
<tr>
<td>13</td>
<td>2019-2020</td>
<td>Sewer Point Repair</td>
<td>$111,772.18</td>
<td>110 LF 8-inch VCP Sewer &amp; 4 laterals</td>
</tr>
<tr>
<td>14</td>
<td>2021-2022</td>
<td>As-Needed Sewer Repairs – 2 years contract</td>
<td>$344,450.00</td>
<td>Laterals repair and sewer lining at various locations</td>
</tr>
</tbody>
</table>

Note: Pipe Materials: Vitrified Clay Pipe (VCP)
SECTION 11 - Monitoring, Measurement, and Program Modification

D.13 (ix) Monitoring, Measurement, and Program Modifications: The Enrollee shall:
   a. Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
   b. Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;
   c. Assess the success of the preventative maintenance program;
   d. Update program elements, as appropriate, based on monitoring or performance evaluations; and
   e. Identify and illustrate SSO trends, including: frequency, location, and volume

11.1 Overview

It is critical that the City monitors implementation of the SSMP elements, and measures the effectiveness of SSMP elements in reducing SSOs. Effectiveness should be measured by developing and tracking performance indicators on a regular basis. Performance indicators should be selected to meet the goals of the wastewater collection system agency.

11.2 Purpose

In order to effectively manage programs, performance measures that gauge success should be developed and data to support the findings must be collected. To this end, accurate and consistent data keeping is extremely important for successful sewer system management. It is imperative that the correct data is captured, in a format that is easily extractable, and that operations personnel understand their role in this process. Focus should be placed on performance metrics, components of trend tracking, and bench-marking procedures both internally and externally. Based upon data collected decisions can be made as to changes that may be warranted and needed in order to maximize program efficiencies. Setting up a Monitoring, Measurement, and Program Modification program will allow a community to better manage and implement SSMP programs.

11.3 Minimum Requirements

At a minimum, the enrollee must:
   a. Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
   b. Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;
   c. Assess the success of the preventative maintenance program;
d. Update program elements, as appropriate, based on monitoring or performance evaluations; and

e. Identify and illustrate SSO trends, including: frequency, location, and volume

11.4 Monitoring

Relevant data on all work done in the implementation and execution of the SSMP program will be documented and maintained in the DPW filing system and used in preparing the monthly Summary of Maintenance of Productivity. These data files are used in the evaluation of the effectiveness of the overall program.

11.5 Program Effectiveness Evaluation

The effectiveness of the program shall be monitored and tracked through the City's proposed Performance Measure Indicators of key activities to minimize sewer overflows. These include:

- total number of overflows
- total number and their amount discharged or reaching the Waters of the United States
- overflow response time
- reduction in repeated incidents of overflow at the same location
- reduction in number of overflows caused by flows exceeding the capacity of the collection system.

Additionally the City has completed 40 percent of the targeted 90 percent of the scheduled preventative maintenance work.

11.6 Program Modifications

The City will be establishing the preventive maintenance sewer metrics for use in monitoring, measuring and adjusting sewer maintenance activities. After these metrics are included in the City's work order system, they will be monitored on a regular basis. Until this time, City staff will compile and monitor the most relevant indicators, which include the number and causes of SSOs, length of pipes cleaned, length of pipes televised and length of pipes repaired.

11.7 SSO Location Mapping and Trends

11.7.1 Location Map
The locations of SSO occurrences will be plotted annually on a citywide map along with recording of their causes. These maps will be used for establishing SSO patterns, identifying hot spots as indicated by clusters on the maps, and for scheduling work assignments and providing information on SSO activities.

11.7.2 Mapping of SSO Frequencies
The monthly numbers of SSO's will also depicted in charts and graphs. The charts will be used to identify SSO trends and as an indicator of infiltration/inflow problems that need to be corrected. The graphs will be used to identify SSO trends and to evaluate overall SSMP program success especially by comparing the graphs to different years.
SECTION 12 - Program Audit Procedures

D.13 (x) SSMP Program Audits - As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee’s compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

12.1 Overview

Audit programs are intended to provide controls for ensuring that all programs associated with the SSMP are being implemented as planned and managed appropriately. Audit outcomes should provide information about challenges and successes in implementing the SSMP by evaluating work practices and operations, documentation, procedures, records, and staff for implementation effectiveness and consistency. The audit will identify any program or policy changes that may be needed to continually improve effective implementation. Information collected as part of an audit should be used in to plan program or procedure revisions necessary to improve program performance.

12.2 Purpose

SSMP audit program development should be developed specifically for the sanitary sewer system, but agency-wide procedures should be incorporated to ensure program sustainability. The audit can contain information about successes in implementing the most recent version of the SSMP, and identify revisions that may be needed for a more effective program. Information collected as part of the Monitoring, Measurement, and Program Modifications program should be used in preparing the audit. Quite often, performance measures and other management indicators are developed, providing a baseline that performance can be measured against. Tables, figures, and charts can be used to summarize information about these indicators. An explanation of the SSMP development and accomplishments in improving the sewer system should be included in the audit, including:

- Progress made on development of SSMP elements, and if the sewer system agency is on schedule in developing all elements of the SSMP;
- SSMP implementation efforts over the timeframe in question;
- The effectiveness of implementing SSMP elements;
- A description of the additions and improvements made to the sanitary sewer collection system in the past reporting year; and
- A description of the additions and improvements planned for the upcoming reporting year with an estimated schedule for implementation.
12.3 Minimum Requirements

The WDR requires that all agencies develop appropriate audit procedures necessary to evaluate the effectiveness of the SSMP, as well as the agency’s compliance with all requirements identified in the WDR. The audit must identify any deficiencies in an agency’s SSMP programs and include steps to correct these issues. At a minimum, audits must be conducted every two years and a report of the findings must be prepared and kept on file.

12.4 SSMP Program Audit

The City will conduct periodic internal audits and prepare a report, at a minimum of every two years. The audit will focus on evaluating the operational and cost effectiveness of the SSMP as well as the City’s compliance with all elements of the SSMP. This will include:
- Identification of any deficiencies in the SSMP
- Steps taken to correct any identified deficiencies
- Notes of interviews with key responding personnel and any contractors utilized
- Notes of operational observations, especially of each SSO event
- Notes on related equipment inspections
- Findings of all reviews of related records

The City hired an outside consultant this year to conduct a comprehensive audit and gap analysis. The results and recommendations of this audit was used to update the SSMP document. All audits including the 2017 audit and gap analysis will be kept on file in the Office of the City Clerk, the DPW office and at the field maintenance yard site.

12.5 SSMP Certification

The City’s original SSMP has been presented to and acted upon by the Inglewood City Council at a public meeting. Subsequent SSMP approval, including the current version, must also be considered and acted upon at a public meeting. Once it is approved, the Director of Public Works must certify its approval in compliance with the WDR requirements, including completion of the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form and sending the signed form to:

State Water Resources Control Board  
Division of Water Quality  
Attn: SSO Program Manager  
P.O. Box 100  
Sacramento, CA 95812

12.6 SSMP Modification and Re-certification

The SSMP must be updated every five years to keep it current. When significant amendments are made to any portion or portions of the SSMP, it must be resubmitted to the City Council for approval and re-certification. The re-certification shall be in accordance with the certification process described in section 12.5 above.
SECTION 13 - Communication Program

(xi) Communication Program – The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented. The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee’s sanitary sewer system.

13.1 Overview

Communication programs are often underrated and overlooked. However, an effective communication program may end up being the key element that keeps your organization from missing critical SSMP deadlines. Involving the public early and at appropriate times will help your organization avoid last minute comments that delay approval of your SSMP by your governing body. A quality communication program with satellite agencies will help to minimize negative operational impacts on your plant or collection system.

It is important to identify an individual who will be responsible for development of your communication program. Larger agencies will typically have Communications and Media Officers or Public Information Officers who are appropriate to lead the development of the communication program. Smaller agencies who don’t have these staff in-house should look to those within the agency who have exhibited strong writing skills, public speaking skills, experience with customer interface, or have successfully completed controversial projects. A self-assessment and rough timeline follow to help you on your way to a successful communication program!

13.2 Purpose

Identifying key stakeholders and key issues, and thinking about how various stakeholders might react are the first step to developing a communication plan. Understanding what elements of an SSMP they will be most concerned with, is one of the many potential considerations that an agency may identify. Involving the right stakeholders on potentially controversial issues as early as possible is important to the success of any new program. Emphasizing collaboration and shared goals to reach a workable solution will not always ensure buy off, but will promote ownership and understanding. Avoiding proper outreach efforts for controversial issues in the hope that interested parties won’t catch on usually backfires. These issues should be considered when developing a communication program

13.3 Minimum Requirements

a) The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.
b) The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee’s sanitary sewer system.

13.4 Communication
The City will provide all stakeholders and interested parties, the general public and other agencies, with status updates on the development and implementation of the SSMP and consider comments received from them. The City will utilize media such as quarterly newsletter, billing insert, special brochures, annual reports, notices in newspapers, and the City’s home web page for conveying this information. Additionally, the City will:

- Identify an individual within its organization who is responsible for development, implementation, and interface for the communication program.

- Identify resources necessary to solicit and incorporate input on each phase of your SSMP (development, implementation, and performance), as well as document your outreach efforts.

- Identify key community stakeholders and key issues that various stakeholders may be interested in and/or concerned with.

- Make sure to involve the right stakeholders on potentially controversial issues as early as possible. Emphasize collaboration and shared goals to reach a workable solution.

- Create a list of key milestones in each phase of your SSMP when stakeholder input would be most useful and effective.

- Create a convenient mechanism for stakeholder input.

- Consider the development of a variety of communication methods, including newsletters, public meetings, web pages, and public service announcements. Different agencies will find that different communication methods are effective. Look for a method that reaches the desired audience at a reasonable cost.

- Consider joint efforts to develop a website with other agencies or professional organizations and share costs. The website could contain general information about the new Waste Discharge Requirements and SSMP components, provide space to make documents available for public review, and contain contact, meeting times and locations, and other agency-specific information.

- For communication with other satellite agencies, consider regular coordination meetings, annual surveys for changes in their system, and/or web pages devoted to satellite agency issues.

- Make sure to have identified a staff person responsible for satellite agency coordination. This person will ensure that the program is sustained, and City’s efforts to get the program up and running aren’t wasted once the SSMP is complete.
13.5 SSMP Availability

Copies of the SSMP will be maintained in the City offices of the City Clerk, the City Engineer and the Director of Public Works and at each field yard sites, with applicable summaries, reports and notices posted on the City’s home web page. The adopted document shall also be made readily available to the Regional Water Quality Control Board (Region No. 4) representatives upon request and to the operators of any collection system or treatment facility downstream of the City’s sanitary sewer system.
APPENDICES

Appendix A ............ Waste Discharge Requirements (Order No. 2006-0003-DWQ)
Appendix B ............ Monitoring and Reporting Program (No. 2006-0003) 'Amended'
Appendix C ............ WDR 'Fact Sheet'
Appendix D ............ Agency WDR Application (NOI)
Appendix E ............ Internal Audit
Appendix A

STATE WATER RESOURCES CONTROL BOARD
ORDER NO. 2006-0003-DWQ

STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS
FOR
SANITARY SEWER SYSTEMS

The State Water Resources Control Board, hereinafter referred to as “State Water Board”, finds that:

1. All federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California are required to comply with the terms of this Order. Such entities are hereinafter referred to as “Enrollees”.

2. Sanitary sewer overflows (SSOs) are overflows from sanitary sewer systems of domestic wastewater, as well as industrial and commercial wastewater, depending on the pattern of land uses in the area served by the sanitary sewer system. SSOs often contain high levels of suspended solids, pathogenic organisms, toxic pollutants, nutrients, oxygen-demanding organic compounds, oil and grease and other pollutants. SSOs may cause a public nuisance, particularly when raw untreated wastewater is discharged to areas with high public exposure, such as streets or surface waters used for drinking, fishing, or body contact recreation. SSOs may pollute surface or ground waters, threaten public health, adversely affect aquatic life, and impair the recreational use and aesthetic enjoyment of surface waters.

3. Sanitary sewer systems experience periodic failures resulting in discharges that may affect waters of the state. There are many factors (including factors related to geology, design, construction methods and materials, age of the system, population growth, and system operation and maintenance), which affect the likelihood of an SSO. A proactive approach that requires Enrollees to ensure a system-wide operation, maintenance, and management plan is in place will reduce the number and frequency of SSOs within the state. This approach will in turn decrease the risk to human health and the environment caused by SSOs.

4. Major causes of SSOs include: grease blockages, root blockages, sewer line flood damage, manhole structure failures, vandalism, pump station mechanical failures, power outages, excessive storm or ground water inflow/infiltration, debris blockages, sanitary sewer system age and construction material failures, lack of proper operation and maintenance, insufficient capacity and contractor-caused damages. Many SSOs are preventable with adequate and appropriate facilities, source control measures and operation and maintenance of the sanitary sewer system.
SEWER SYSTEM MANAGEMENT PLANS

5. To facilitate proper funding and management of sanitary sewer systems, each Enrollee must develop and implement a system-specific Sewer System Management Plan (SSMP). To be effective, SSMPs must include provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit analysis. Additionally, an SSMP must contain a spill response plan that establishes standard procedures for immediate response to an SSO in a manner designed to minimize water quality impacts and potential nuisance conditions.

6. Many local public agencies in California have already developed SSMPs and implemented measures to reduce SSOs. These entities can build upon their existing efforts to establish a comprehensive SSMP consistent with this Order. Others, however, still require technical assistance and, in some cases, funding to improve sanitary sewer system operation and maintenance in order to reduce SSOs.

7. SSMP certification by technically qualified and experienced persons can provide a useful and cost-effective means for ensuring that SSMPs are developed and implemented appropriately.

8. It is the State Water Board’s intent to gather additional information on the causes and sources of SSOs to augment existing information and to determine the full extent of SSOs and consequent public health and/or environmental impacts occurring in the State.

9. Both uniform SSO reporting and a centralized statewide electronic database are needed to collect information to allow the State Water Board and Regional Water Quality Control Boards (Regional Water Boards) to effectively analyze the extent of SSOs statewide and their potential impacts on beneficial uses and public health. The monitoring and reporting program required by this Order and the attached Monitoring and Reporting Program No. 2006-0003-DWG, are necessary to assure compliance with these waste discharge requirements (WDRs).

10. Information regarding SSOs must be provided to Regional Water Boards and other regulatory agencies in a timely manner and be made available to the public in a complete, concise, and timely fashion.

11. Some Regional Water Boards have issued WDRs or WDRs that serve as National Pollution Discharge Elimination System (NPDES) permits to sanitary sewer system owners/operators within their jurisdictions. This Order establishes minimum requirements to prevent SSOs. Although it is the State Water Board’s intent that this Order be the primary regulatory mechanism for sanitary sewer systems statewide, Regional Water Boards may issue more stringent or more
prescriptive WDRs for sanitary sewer systems. Upon issuance or reissuance of a Regional Water Board’s WDRs for a system subject to this Order, the Regional Water Board shall coordinate its requirements with stated requirements within this Order, to identify requirements that are more stringent, to remove requirements that are less stringent than this Order, and to provide consistency in reporting.

REGULATORY CONSIDERATIONS

12. California Water Code section 13263 provides that the State Water Board may prescribe general WDRs for a category of discharges if the State Water Board finds or determines that:

- The discharges are produced by the same or similar operations;
- The discharges involve the same or similar types of waste;
- The discharges require the same or similar treatment standards; and
- The discharges are more appropriately regulated under general discharge requirements than individual discharge requirements.

This Order establishes requirements for a class of operations, facilities, and discharges that are similar throughout the state.

13. The issuance of general WDRs to the Enrollees will:
   a) Reduce the administrative burden of issuing individual WDRs to each Enrollee;
   b) Provide for a unified statewide approach for the reporting and database tracking of SSOs;
   c) Establish consistent and uniform requirements for SSMP development and implementation;
   d) Provide statewide consistency in reporting; and
   e) Facilitate consistent enforcement for violations.

14. The beneficial uses of surface waters that can be impaired by SSOs include, but are not limited to, aquatic life, drinking water supply, body contact and non-contact recreation, and aesthetics. The beneficial uses of ground water that can be impaired include, but are not limited to, drinking water and agricultural supply. Surface and ground waters throughout the state support these uses to varying degrees.

15. The implementation of requirements set forth in this Order will ensure the reasonable protection of past, present, and probable future beneficial uses of water and the prevention of nuisance. The requirements implement the water quality control plans (Basin Plans) for each region and take into account the environmental characteristics of hydrographic units within the state. Additionally, the State Water Board has considered water quality conditions that could reasonably be achieved through the coordinated control of all factors that affect
water quality in the area, costs associated with compliance with these requirements, the need for developing housing within California, and the need to develop and use recycled water.

16. The Federal Clean Water Act largely prohibits any discharge of pollutants from a point source to waters of the United States except as authorized under an NPDES permit. In general, any point source discharge of sewage effluent to waters of the United States must comply with technology-based, secondary treatment standards, at a minimum, and any more stringent requirements necessary to meet applicable water quality standards and other requirements. Hence, the unpermitted discharge of wastewater from a sanitary sewer system to waters of the United States is illegal under the Clean Water Act. In addition, many Basin Plans adopted by the Regional Water Boards contain discharge prohibitions that apply to the discharge of untreated or partially treated wastewater. Finally, the California Water Code generally prohibits the discharge of waste to land prior to the filing of any required report of waste discharge and the subsequent issuance of either WDRs or a waiver of WDRs.

17. California Water Code section 13263 requires a water board to, after any necessary hearing, prescribe requirements as to the nature of any proposed discharge, existing discharge, or material change in an existing discharge. The requirements shall, among other things, take into consideration the need to prevent nuisance.

18. California Water Code section 13050, subdivision (m), defines nuisance as anything which meets all of the following requirements:
   a. Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
   b. Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
   c. Occurs during, or as a result of, the treatment or disposal of wastes.

19. This Order is consistent with State Water Board Resolution No. 68-16 (Statement of Policy with Respect to Maintaining High Quality of Waters in California) in that the Order imposes conditions to prevent impacts to water quality, does not allow the degradation of water quality, will not unreasonably affect beneficial uses of water, and will not result in water quality less than prescribed in State Water Board or Regional Water Board plans and policies.

20. The action to adopt this General Order is exempt from the California Environmental Quality Act (Public Resources Code §21000 et seq.) because it is an action taken by a regulatory agency to assure the protection of the environment and the regulatory process involves procedures for protection of the environment. (Cal. Code Regs., tit. 14, §15308). In addition, the action to adopt
this Order is exempt from CEQA pursuant to Cal.Code Regs., title 14, §15301 to
the extent that it applies to existing sanitary sewer collection systems that
constitute “existing facilities” as that term is used in Section 15301, and §15302,
to the extent that it results in the repair or replacement of existing systems
involving negligible or no expansion of capacity.

21. The Fact Sheet, which is incorporated by reference in the Order, contains
supplemental information that was also considered in establishing these
requirements.

22. The State Water Board has notified all affected public agencies and all known
interested persons of the intent to prescribe general WDRs that require Enrollees
to develop SSMPs and to report all SSOs.

23. The State Water Board conducted a public hearing on February 8, 2006, to
receive oral and written comments on the draft order. The State Water Board
received and considered, at its May 2, 2006, meeting, additional public
comments on substantial changes made to the proposed general WDRs
following the February 8, 2006, public hearing. The State Water Board has
considered all comments pertaining to the proposed general WDRs.

**IT IS HEREBY ORDERED**, that pursuant to California Water Code section 13263, the
Enrollees, their agents, successors, and assigns, in order to meet the provisions
contained in Division 7 of the California Water Code and regulations adopted
hereunder, shall comply with the following:

A. **DEFINITIONS**

1. **Sanitary sewer overflow (SSO)** - Any overflow, spill, release, discharge or
diversion of untreated or partially treated wastewater from a sanitary sewer
system. SSOs include:
   (i) Overflows or releases of untreated or partially treated wastewater that
reach waters of the United States;
   (ii) Overflows or releases of untreated or partially treated wastewater that do
not reach waters of the United States; and
   (iii) Wastewater backups into buildings and on private property that are
caused by blockages or flow conditions within the publicly owned portion
of a sanitary sewer system.

2. **Sanitary sewer system** – Any system of pipes, pump stations, sewer lines, or
other conveyances, upstream of a wastewater treatment plant headworks used
to collect and convey wastewater to the publicly owned treatment facility.
Temporary storage and conveyance facilities (such as vaults, temporary piping,
construction trenches, wet wells, impoundments, tanks, etc.) are considered to
be part of the sanitary sewer system, and discharges into these temporary
storage facilities are not considered to be SSOs.
For purposes of this Order, sanitary sewer systems include only those systems owned by public agencies that are comprised of more than one mile of pipes or sewer lines.

3. **Enrollee** - A federal or state agency, municipality, county, district, and other public entity that owns or operates a sanitary sewer system, as defined in the general WDRs, and that has submitted a complete and approved application for coverage under this Order.

4. **SSO Reporting System** – Online spill reporting system that is hosted, controlled, and maintained by the State Water Board. The web address for this site is http://ciwqs.waterboards.ca.gov. This online database is maintained on a secure site and is controlled by unique usernames and passwords.

5. **Untreated or partially treated wastewater** – Any volume of waste discharged from the sanitary sewer system upstream of a wastewater treatment plant headworks.

6. **Satellite collection system** – The portion, if any, of a sanitary sewer system owned or operated by a different public agency than the agency that owns and operates the wastewater treatment facility to which the sanitary sewer system is tributary.

7. **Nuisance** - California Water Code section 13050, subdivision (m), defines nuisance as anything which meets all of the following requirements:
   a. Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
   b. Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
   c. Occurs during, or as a result of, the treatment or disposal of wastes.

**B. APPLICATION REQUIREMENTS**

1. **Deadlines for Application** – All public agencies that currently own or operate sanitary sewer systems within the State of California must apply for coverage under the general WDRs within six (6) months of the date of adoption of the general WDRs. Additionally, public agencies that acquire or assume responsibility for operating sanitary sewer systems after the date of adoption of this Order must apply for coverage under the general WDRs at least three (3) months prior to operation of those facilities.

2. **Applications under the general WDRs** – In order to apply for coverage pursuant to the general WDRs, a legally authorized representative for each agency must submit a complete application package. Within sixty (60) days of adoption of the general WDRs, State Water Board staff will send specific instructions on how to
apply for coverage under the general WDRs to all known public agencies that own sanitary sewer systems. Agencies that do not receive notice may obtain applications and instructions online on the Water Board’s website.

3. Coverage under the general WDRs – Permit coverage will be in effect once a complete application package has been submitted and approved by the State Water Board’s Division of Water Quality.

C. PROHIBITIONS

1. Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.

2. Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is prohibited.

D. PROVISIONS

1. The Enrollee must comply with all conditions of this Order. Any noncompliance with this Order constitutes a violation of the California Water Code and is grounds for enforcement action.

2. It is the intent of the State Water Board that sanitary sewer systems be regulated in a manner consistent with the general WDRs. Nothing in the general WDRs shall be:

   (i) Interpreted or applied in a manner inconsistent with the Federal Clean Water Act, or supersedes a more specific or more stringent state or federal requirement in an existing permit, regulation, or administrative/judicial order or Consent Decree;

   (ii) Interpreted or applied to authorize an SSO that is illegal under either the Clean Water Act, an applicable Basin Plan prohibition or water quality standard, or the California Water Code;

   (iii) Interpreted or applied to prohibit a Regional Water Board from issuing an individual NPDES permit or WDR, superseding this general WDR, for a sanitary sewer system, authorized under the Clean Water Act or California Water Code;

   (iv) Interpreted or applied to supersede any more specific or more stringent WDRs or enforcement order issued by a Regional Water Board.

3. The Enrollee shall take all feasible steps to eliminate SSOs. In the event that an SSO does occur, the Enrollee shall take all feasible steps to contain and mitigate the impacts of an SSO.

4. In the event of an SSO, the Enrollee shall take all feasible steps to prevent untreated or partially treated wastewater from discharging from storm drains into
flood control channels or waters of the United States by blocking the storm drainage system and by removing the wastewater from the storm drains.

5. All SSOs must be reported in accordance with Section G of the general WDRs.

6. In any enforcement action, the State and/or Regional Water Boards will consider the appropriate factors under the duly adopted State Water Board Enforcement Policy. And, consistent with the Enforcement Policy, the State and/or Regional Water Boards must consider the Enrollee’s efforts to contain, control, and mitigate SSOs when considering the California Water Code Section 13327 factors. In assessing these factors, the State and/or Regional Water Boards will also consider whether:

(i) The Enrollee has complied with the requirements of this Order, including requirements for reporting and developing and implementing a SSMP;

(ii) The Enrollee can identify the cause or likely cause of the discharge event;

(iii) There were no feasible alternatives to the discharge, such as temporary storage or retention of untreated wastewater, reduction of inflow and infiltration, use of adequate backup equipment, collecting and hauling of untreated wastewater to a treatment facility, or an increase in the capacity of the system as necessary to contain the design storm event identified in the SSMP. It is inappropriate to consider the lack of feasible alternatives, if the Enrollee does not implement a periodic or continuing process to identify and correct problems.

(iv) The discharge was exceptional, unintentional, temporary, and caused by factors beyond the reasonable control of the Enrollee;

(v) The discharge could have been prevented by the exercise of reasonable control described in a certified SSMP for:
   - Proper management, operation and maintenance;
   - Adequate treatment facilities, sanitary sewer system facilities, and/or components with an appropriate design capacity, to reasonably prevent SSOs (e.g., adequately enlarging treatment or collection facilities to accommodate growth, infiltration and inflow (I/I), etc.);
   - Preventive maintenance (including cleaning and fats, oils, and grease (FOG) control);
   - Installation of adequate backup equipment; and
   - Inflow and infiltration prevention and control to the extent practicable.

(vi) The sanitary sewer system design capacity is appropriate to reasonably prevent SSOs.
(vii) The Enrollee took all reasonable steps to stop and mitigate the impact of the discharge as soon as possible.

7. When a sanitary sewer overflow occurs, the Enrollee shall take all feasible steps and necessary remedial actions to 1) control or limit the volume of untreated or partially treated wastewater discharged, 2) terminate the discharge, and 3) recover as much of the wastewater discharged as possible for proper disposal, including any wash down water.

The Enrollee shall implement all remedial actions to the extent they may be applicable to the discharge and not inconsistent with an emergency response plan, including the following:

  (i) Interception and rerouting of untreated or partially treated wastewater flows around the wastewater line failure;
  (ii) Vacuum truck recovery of sanitary sewer overflows and wash down water;
  (iii) Cleanup of debris at the overflow site;
  (iv) System modifications to prevent another SSO at the same location;
  (v) Adequate sampling to determine the nature and impact of the release; and
  (vi) Adequate public notification to protect the public from exposure to the SSO.

8. The Enrollee shall properly, manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.

9. The Enrollee shall allocate adequate resources for the operation, maintenance, and repair of its sanitary sewer system, by establishing a proper rate structure, accounting mechanisms, and auditing procedures to ensure an adequate measure of revenues and expenditures. These procedures must be in compliance with applicable laws and regulations and comply with generally acceptable accounting practices.

10. The Enrollee shall provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events. Capacity shall meet or exceed the design criteria as defined in the Enrollee’s System Evaluation and Capacity Assurance Plan for all parts of the sanitary sewer system owned or operated by the Enrollee.

11. The Enrollee shall develop and implement a written Sewer System Management Plan (SSMP) and make it available to the State and/or Regional Water Board upon request. A copy of this document must be publicly available at the Enrollee’s office and/or available on the Internet. This SSMP must be approved by the Enrollee’s governing board at a public meeting.
12. In accordance with the California Business and Professions Code sections 6735, 7835, and 7835.1, all engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. Specific elements of the SSMP that require professional evaluation and judgments shall be prepared by or under the direction of appropriately qualified professionals, and shall bear the professional(s)' signature and stamp.

13. The mandatory elements of the SSMP are specified below. However, if the Enrollee believes that any element of this section is not appropriate or applicable to the Enrollee's sanitary sewer system, the SSMP program does not need to address that element. The Enrollee must justify why that element is not applicable. The SSMP must be approved by the deadlines listed in the SSMP Time Schedule below.

Sewer System Management Plan (SSMP)

(i) **Goal:** The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

(ii) **Organization:** The SSMP must identify:

   (a) The name of the responsible or authorized representative as described in Section J of this Order.

   (b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and

   (c) The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

(iii) **Legal Authority:** Each Enrollee must demonstrate, through sanitary sewer system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

   (a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);
(b) Require that sewers and connections be properly designed and constructed;

(c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;

(d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and

(e) Enforce any violation of its sewer ordinances.

(iv) Operation and Maintenance Program. The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:

(a) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities;

(b) Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;

(c) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;

(d) Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
(v) **Design and Performance Provisions:**

(a) Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and

(b) Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

(vi) **Overflow Emergency Response Plan** - Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

(a) Proper notification procedures so that the 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 to 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 MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or 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.
(vii) **FOG Control Program:** Each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

(a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;

(b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;

(c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;

(d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;

(e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;

(f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and

(g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

(viii) **System Evaluation and Capacity Assurance Plan:** The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

(a) **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs
that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;

(b) **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and

(c) **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.

(d) **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14.

(ix) **Monitoring, Measurement, and Program Modifications:** The Enrollee shall:

(a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;

(b) Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;

(c) Assess the success of the preventative maintenance program;

(d) Update program elements, as appropriate, based on monitoring or performance evaluations; and

(e) Identify and illustrate SSO trends, including: frequency, location, and volume.

(x) **SSMP Program Audits** - As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the
Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

(xii) **Communication Program** – The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.

The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

14. Both the SSMP and the Enrollee's program to implement the SSMP must be certified by the Enrollee to be in compliance with the requirements set forth above and must be presented to the Enrollee's governing board for approval at a public meeting. The Enrollee shall certify that the SSMP, and subparts thereof, are in compliance with the general WDRs within the time frames identified in the time schedule provided in subsection D.15, below.

In order to complete this certification, the Enrollee's authorized representative must complete the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form, and sending the form to:

State Water Resources Control Board  
Division of Water Quality  
Attn: SSO Program Manager  
P.O. Box 100  
Sacramento, CA 95812

The SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification by the governing board of the Enrollee is required in accordance with D.14 when significant updates to the SSMP are made. To complete the re-certification process, the Enrollee shall enter the data in the Online SSO Database and mail the form to the State Water Board, as described above.

15. The Enrollee shall comply with these requirements according to the following schedule. This time schedule does not supersede existing requirements or time schedules associated with other permits or regulatory requirements.
<table>
<thead>
<tr>
<th>Task and Associated Section</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application for Permit Coverage</td>
<td>6 months after WDRs Adoption</td>
</tr>
<tr>
<td><strong>Section C</strong></td>
<td></td>
</tr>
<tr>
<td>Reporting Program <strong>Section G</strong></td>
<td>6 months after WDRs Adoption¹</td>
</tr>
<tr>
<td>SSMP Development Plan and Schedule</td>
<td></td>
</tr>
<tr>
<td><strong>No specific Section</strong></td>
<td></td>
</tr>
<tr>
<td>Goals and Organization Structure <strong>Section D 13 (i) &amp; (ii)</strong></td>
<td>12 months after WDRs Adoption²</td>
</tr>
<tr>
<td>Overflow Emergency Response Program <strong>Section D 13 (vi)</strong></td>
<td></td>
</tr>
<tr>
<td>Legal Authority <strong>Section D 13 (iii)</strong></td>
<td></td>
</tr>
<tr>
<td>Operation and Maintenance Program <strong>Section D 13 (iv)</strong></td>
<td>24 months after WDRs Adoption²</td>
</tr>
<tr>
<td>Grease Control Program <strong>Section D 13 (vii)</strong></td>
<td>30 months after WDRs Adoption²</td>
</tr>
<tr>
<td>Design and Performance <strong>Section D 13 (v)</strong></td>
<td>36 months after WDRs Adoption²</td>
</tr>
<tr>
<td>System Evaluation and Capacity Assurance Plan <strong>Section D 13 (viii)</strong></td>
<td>39 months after WDRs Adoption²</td>
</tr>
<tr>
<td>Final SSMP, incorporating all of the SSMP requirements <strong>Section D 13</strong></td>
<td>48 months after WDRs Adoption</td>
</tr>
<tr>
<td></td>
<td>51 months after WDRs Adoption</td>
</tr>
</tbody>
</table>
1. In the event that by July 1, 2006 the Executive Director is able to execute a memorandum of agreement (MOA) with the California Water Environment Association (CWEA) or discharger representatives outlining a strategy and time schedule for CWEA or another entity to provide statewide training on the adopted monitoring program, SSO database electronic reporting, and SSMP development, consistent with this Order, then the schedule of Reporting Program Section G shall be replaced with the following schedule:

<table>
<thead>
<tr>
<th>Reporting Program</th>
<th>Section G</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regional Boards 4, 8, and 9</td>
<td>8 months after WDRs Adoption</td>
</tr>
<tr>
<td>Regional Boards 1, 2, and 3</td>
<td>12 months after WDRs Adoption</td>
</tr>
<tr>
<td>Regional Boards 5, 6, and 7</td>
<td>16 months after WDRs Adoption</td>
</tr>
</tbody>
</table>

If this MOU is not executed by July 1, 2006, the reporting program time schedule will remain six (6) months for all regions and agency size categories.

2. In the event that the Executive Director executes the MOA identified in note 1 by July 1, 2006, then the deadline for this task shall be extended by six (6) months. The time schedule identified in the MOA must be consistent with the extended time schedule provided by this note. If the MOA is not executed by July 1, 2006, the six (6) month time extension will not be granted.

E. **WDRs and SSMP AVAILABILITY**

1. A copy of the general WDRs and the certified SSMP shall be maintained at appropriate locations (such as the Enrollee’s offices, facilities, and/or Internet homepage) and shall be available to sanitary sewer system operating and maintenance personnel at all times.

F. **ENTRY AND INSPECTION**

1. The Enrollee shall allow the State or Regional Water Boards or their authorized representative, upon presentation of credentials and other documents as may be required by law, to:

   a. Enter upon the Enrollee’s premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and

d. Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order or as otherwise authorized by the California Water Code, any substances or parameters at any location.

G. GENERAL MONITORING AND REPORTING REQUIREMENTS

1. The Enrollee shall furnish to the State or Regional Water Board, within a reasonable time, any information that the State or Regional Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Enrollee shall also furnish to the Executive Director of the State Water Board or Executive Officer of the applicable Regional Water Board, upon request, copies of records required to be kept by this Order.

2. The Enrollee shall comply with the attached Monitoring and Reporting Program No. 2006-0003 and future revisions thereto, as specified by the Executive Director. Monitoring results shall be reported at the intervals specified in Monitoring and Reporting Program No. 2006-0003. Unless superseded by a specific enforcement Order for a specific Enrollee, these reporting requirements are intended to replace other mandatory routine written reports associated with SSOs.

3. All Enrollees must obtain SSO Database accounts and receive a “Username” and “Password” by registering through the California Integrated Water Quality System (CIWQS). These accounts will allow controlled and secure entry into the SSO Database. Additionally, within 30 days of receiving an account and prior to recording spills into the SSO Database, all Enrollees must complete the “Collection System Questionnaire”, which collects pertinent information regarding a Enrollee’s collection system. The “Collection System Questionnaire” must be updated at least every 12 months.

4. Pursuant to Health and Safety Code section 5411.5, any person who, without regard to intent or negligence, causes or permits any untreated wastewater or other waste to be discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State, as soon as that person has knowledge of the discharge, shall immediately notify the local health officer of the discharge. Discharges of untreated or partially treated wastewater to storm drains and drainage channels, whether man-made or natural or concrete-lined, shall be reported as required above.

Any SSO greater than 1,000 gallons discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State shall also be reported to the Office of Emergency Services pursuant to California Water Code section 13271.
H. CHANGE IN OWNERSHIP

1. This Order is not transferable to any person or party, except after notice to the Executive Director. The Enrollee shall submit this notice in writing at least 30 days in advance of any proposed transfer. The notice must include a written agreement between the existing and new Enrollee containing a specific date for the transfer of this Order's responsibility and coverage between the existing Enrollee and the new Enrollee. This agreement shall include an acknowledgement that the existing Enrollee is liable for violations up to the transfer date and that the new Enrollee is liable from the transfer date forward.

I. INCOMPLETE REPORTS

1. If an Enrollee becomes aware that it failed to submit any relevant facts in any report required under this Order, the Enrollee shall promptly submit such facts or information by formally amending the report in the Online SSO Database.

J. REPORT DECLARATION

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.

K. CIVIL MONETARY REMEDIES FOR DISCHARGE VIOLATIONS

1. The California Water Code provides various enforcement options, including civil monetary remedies, for violations of this Order.

2. The California Water Code also provides that any person failing or refusing to furnish technical or monitoring program reports, as required under this Order, or
falsifying any information provided in the technical or monitoring reports is subject to civil monetary penalties.

L. SEVERABILITY

1. The provisions of this Order are severable, and if any provision of this Order, or the application of any provision of this Order to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this Order, shall not be affected thereby.

2. This order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, nor protect the Enrollee from liability under federal, state or local laws, nor create a vested right for the Enrollee to continue the waste discharge.

CERTIFICATION

The undersigned Clerk to the State Water Board does hereby certify that the foregoing is a full, true, and correct copy of general WDRs duly and regularly adopted at a meeting of the State Water Resources Control Board held on May 2, 2006.

AYE: Tam M. Doduc
     Gerald D. Secundy

NO: Arthur G. Baggett

ABSENT: None

ABSTAIN: None

Song Her
Clerk to the Board
STATE OF CALIFORNIA
WATER RESOURCES CONTROL BOARD
ORDER NO. WQ 2013-0058-EXEC

AMENDING MONITORING AND REPORTING PROGRAM
FOR
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SANITARY SEWER SYSTEMS

The State of California, Water Resources Control Board (hereafter State Water Board) finds:

1. The State Water Board is authorized to prescribe statewide general Waste Discharge Requirements (WDRs) for categories of discharges that involve the same or similar operations and the same or similar types of waste pursuant to Water Code section 13263(i).

2. Water Code section 13193 et seq. requires the Regional Water Quality Control Boards (Regional Water Boards) and the State Water Board (collectively, the Water Boards) to gather Sanitary Sewer Overflow (SSO) information and make this information available to the public, including but not limited to, SSO cause, estimated volume, location, date, time, duration, whether or not the SSO reached or may have reached waters of the state, response and corrective action taken, and an enrollee's contact information for each SSO event. An enrollee is defined as the public entity having legal authority over the operation and maintenance of, or capital improvements to, a sanitary sewer system greater than one mile in length.

3. Water Code section 13271, et seq. requires notification to the California Office of Emergency Services (Cal OES), formerly the California Emergency Management Agency, for certain unauthorized discharges, including SSOS.

4. On May 2, 2006, the State Water Board adopted Order 2006-0003-DWQ, "Statewide Waste Discharge Requirements for Sanitary Sewer Systems"1 (hereafter SSS WDRs) to comply with Water Code section 13193 and to establish the framework for the statewide SSO Reduction Program.

5. Subsection G.2 of the SSS WDRs and the Monitoring and Reporting Program (MRP) provide that the Executive Director may modify the terms of the MRP at any time.

6. On February 20, 2008, the State Water Board Executive Director adopted a revised MRP for the SSS WDRs to rectify early notification deficiencies and ensure that first responders are notified in a timely manner of SSOS discharged into waters of the state.

7. When notified of an SSO that reaches a drainage channel or surface water of the state, Cal OES, pursuant to Water Code section 13271(a)(3), forwards the SSO notification information2 to local government agencies and first responders including local public health officials and the applicable Regional Water Board. Receipt of notifications for a single SSO event from both the SSO reporter

---

1 Available for download at:

2 Cal OES Hazardous Materials Spill Reports available Online at:
http://w3.calema.ca.gov/operational/malhaz.nsf/$defaultview and http://w3.calema.ca.gov/operational/malhaz.nsf
and Cal OES is duplicative. To address this, the SSO notification requirements added by the February 20, 2008 MRP revision are being removed in this MRP revision.

8. In the February 28, 2008 Memorandum of Agreement between the State Water Board and the California Water and Environment Association (CWEA), the State Water Board committed to re-designing the CIWQS Online SSO Database to allow “event” based SSO reporting versus the original “location” based reporting. Revisions to this MRP and accompanying changes to the CIWQS Online SSO Database will implement this change by allowing for multiple SSO appearance points to be associated with each SSO event caused by a single asset failure.

9. Based on stakeholder input and Water Board staff experience implementing the SSO Reduction Program, SSO categories have been revised in this MRP. In the prior version of the MRP, SSOs have been categorized as Category 1 or Category 2. This MRP implements changes to SSO categories by adding a Category 3 SSO type. This change will improve data management to further assist Water Board staff with evaluation of high threat and low threat SSOs by placing them in unique categories (i.e., Category 1 and Category 3, respectively). This change will also assist enrollees in identifying SSOs that require Cal OES notification.

10. Based on over six years of implementation of the SSS WDRs, the State Water Board concludes that the February 20, 2008 MRP must be updated to better advance the SSO Reduction Program objectives, assess compliance, and enforce the requirements of the SSS WDRs.

IT IS HEREBY ORDERED THAT:

Pursuant to the authority delegated by Water Code section 13267(f), Resolution 2002-0104, and Order 2006-0003-DWQ, the MRP for the SSS WDRs (Order 2006-0003-DWQ) is hereby amended as shown in Attachment A and shall be effective on September 9, 2013.

\[8/6/13\]

[Signature]
Thomas Howard  
Executive Director

---


4 Statewide Sanitary Sewer Overflow Reduction Program information is available at: http://www.waterboards.ca.gov/water_issues/programs/ssw/
ATTACHMENT A

STATE WATER RESOURCES CONTROL BOARD
ORDER NO. WQ 2013-0058-EXEC

AMENDING MONITORING AND REPORTING PROGRAM
FOR
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SANITARY SEWER SYSTEMS

This Monitoring and Reporting Program (MRP) establishes monitoring, record keeping, reporting and public notification requirements for Order 2006-0003-DWQ, "Statewide General Waste Discharge Requirements for Sanitary Sewer Systems" (SSS WDRs). This MRP shall be effective from September 9, 2013 until it is rescinded. The Executive Director may make revisions to this MRP at any time. These revisions may include a reduction or increase in the monitoring and reporting requirements. All site specific records and data developed pursuant to the SSS WDRs and this MRP shall be complete, accurate, and justified by evidence maintained by the enrollee. Failure to comply with this MRP may subject an enrollee to civil liabilities of up to $5,000 a day per violation pursuant to Water Code section 13350; up to $1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement. The State Water Resources Control Board (State Water Board) reserves the right to take any further enforcement action authorized by law.

A. SUMMARY OF MRP REQUIREMENTS

Table 1 – Spill Categories and Definitions

<table>
<thead>
<tr>
<th>CATEGORIES</th>
<th>DEFINITIONS (see Section A on page 5 of Order 2006-0003-DWQ for Sanitary Sewer Overflow (SSO) definition)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CATEGORY 1</td>
<td>Discharges of untreated or partially treated wastewater of any volume resulting from an enrollee’s sanitary sewer system failure or flow condition that:</td>
</tr>
<tr>
<td></td>
<td>• Reach surface water and/or reach a drainage channel tributary to a surface water; or</td>
</tr>
<tr>
<td></td>
<td>• Reach a Municipal Separate Storm Sewer System (MS4) and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond).</td>
</tr>
<tr>
<td>CATEGORY 2</td>
<td>Discharges of untreated or partially treated wastewater of 1,000 gallons or greater resulting from an enrollee’s sanitary sewer system failure or flow condition that do not reach surface water, a drainage channel, or a MS4 unless the entire SSO discharged to the storm drain system is fully recovered and disposed of properly.</td>
</tr>
<tr>
<td>CATEGORY 3</td>
<td>All other discharges of untreated or partially treated wastewater resulting from an enrollee’s sanitary sewer system failure or flow condition.</td>
</tr>
<tr>
<td>PRIVATE LATERAL SEWER DISCHARGE (PLSD)</td>
<td>Discharges of untreated or partially treated wastewater resulting from blockages or other problems within a privately-owned sewer lateral connected to the enrollee’s sanitary sewer system or from other private sewer assets. PLSDs that the enrollee becomes aware of may be voluntarily reported to the California Integrated Water Quality System (CIWQS) Online SSO Database.</td>
</tr>
<tr>
<td>ELEMENT</td>
<td>REQUIREMENT</td>
</tr>
<tr>
<td>-------------------------</td>
<td>----------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>NOTIFICATION</strong></td>
<td>• Within two hours of becoming aware of any Category 1 SSO greater than or equal to 1,000 gallons discharged to surface water or spilled in a location where it probably will be discharged to surface water, notify the California Office of Emergency Services (Cal OES) and obtain a notification control number.</td>
</tr>
<tr>
<td>(Section B of MRP)</td>
<td>• Category 1 SSO: Submit draft report within three business days of becoming aware of the SSO and certify within 15 calendar days of SSO end date.</td>
</tr>
<tr>
<td></td>
<td>• Category 2 SSO: Submit draft report within 3 business days of becoming aware of the SSO and certify within 15 calendar days of the SSO end date.</td>
</tr>
<tr>
<td></td>
<td>• Category 3 SSO: Submit certified report within 30 calendar days of the end of month in which SSO occurred.</td>
</tr>
<tr>
<td></td>
<td>• SSO Technical Report: Submit within 45 calendar days after the end date of any Category 1 SSO in which 50,000 gallons or greater are spilled to surface waters.</td>
</tr>
<tr>
<td></td>
<td>• “No Spill” Certification: Certify that no SSOs occurred within 30 calendar days of the end of the month or, if reporting quarterly, the quarter in which no SSOs occurred.</td>
</tr>
<tr>
<td></td>
<td>• Collection System Questionnaire: Update and certify every 12 months.</td>
</tr>
<tr>
<td><strong>WATER QUALITY</strong></td>
<td>• Conduct water quality sampling within 48 hours after initial SSO notification for Category 1 SSOs in which 50,000 gallons or greater are spilled to surface waters.</td>
</tr>
<tr>
<td>MONITORING**</td>
<td>• SSO event records.</td>
</tr>
<tr>
<td>(Section C of MRP)</td>
<td>• Records documenting Sanitary Sewer Management Plan (SSMP) implementation and changes/updates to the SSMP.</td>
</tr>
<tr>
<td></td>
<td>• Records to document Water Quality Monitoring for SSOs of 50,000 gallons or greater spilled to surface waters.</td>
</tr>
<tr>
<td></td>
<td>• Collection system telemetry records if relied upon to document and/or estimate SSO Volume.</td>
</tr>
<tr>
<td><strong>RECORD KEEPING</strong></td>
<td>• SSO event records.</td>
</tr>
<tr>
<td>(Section D of MRP)</td>
<td>• Records documenting Sanitary Sewer Management Plan (SSMP) implementation and changes/updates to the SSMP.</td>
</tr>
<tr>
<td></td>
<td>• Records to document Water Quality Monitoring for SSOs of 50,000 gallons or greater spilled to surface waters.</td>
</tr>
<tr>
<td></td>
<td>• Collection system telemetry records if relied upon to document and/or estimate SSO Volume.</td>
</tr>
</tbody>
</table>
B. NOTIFICATION REQUIREMENTS

Although Regional Water Quality Control Boards (Regional Water Boards) and the State Water Board (collectively, the Water Boards) staff do not have duties as first responders, this MRP is an appropriate mechanism to ensure that the agencies that have first responder duties are notified in a timely manner in order to protect public health and beneficial uses.

1. For any Category 1 SSO greater than or equal to 1,000 gallons that results in a discharge to a surface water or spilled in a location where it probably will be discharged to surface water, either directly or by way of a drainage channel or MS4, the enrollee shall, as soon as possible, but not later than two (2) hours after (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, notify the Cal OES and obtain a notification control number.

2. To satisfy notification requirements for each applicable SSO, the enrollee shall provide the information requested by Cal OES before receiving a control number. Spill information requested by Cal OES may include:
   i. Name of person notifying Cal OES and direct return phone number.
   ii. Estimated SSO volume discharged (gallons).
   iii. If ongoing, estimated SSO discharge rate (gallons per minute).
   iv. SSO Incident Description:
      a. Brief narrative.
      b. On-scene point of contact for additional information (name and cell phone number).
      c. Date and time enrollee became aware of the SSO.
      d. Name of sanitary sewer system agency causing the SSO.
      e. SSO cause (if known).
   v. Indication of whether the SSO has been contained.
   vi. Indication of whether surface water is impacted.
   vii. Name of surface water impacted by the SSO, if applicable.
   viii. Indication of whether a drinking water supply is or may be impacted by the SSO.
   ix. Any other known SSO impacts.
   x. SSO incident location (address, city, state, and zip code).

3. Following the initial notification to Cal OES and until such time that an enrollee certifies the SSO report in the CIWQS Online SSO Database, the enrollee shall provide updates to Cal OES regarding substantial changes to the estimated volume of untreated or partially treated sewage discharged and any substantial change(s) to known impact(s).

4. PLSDs: The enrollee is strongly encouraged to notify Cal OES of discharges greater than or equal to 1,000 gallons of untreated or partially treated wastewater that result or may result in a discharge to surface water resulting from failures or flow conditions within a privately owned sewer lateral or from other private sewer asset(s) if the enrollee becomes aware of the PLSD.
C. REPORTING REQUIREMENTS

1. CIWQS Online SSO Database Account: All enrollees shall obtain a CIWQS Online SSO Database account and receive a "Username" and "Password" by registering through CIWQS. These accounts allow controlled and secure entry into the CIWQS Online SSO Database.

2. SSO Mandatory Reporting Information: For reporting purposes, if one SSO event results in multiple appearance points in a sewer system asset, the enrollee shall complete one SSO report in the CIWQS Online SSO Database which includes the GPS coordinates for the location of the SSO appearance point closest to the failure point, blockage or location of the flow condition that caused the SSO, and provide descriptions of the locations of all other discharge points associated with the SSO event.

3. SSO Categories
   i. Category 1 – Discharges of untreated or partially treated wastewater of any volume resulting from an enrollee's sanitary sewer system failure or flow condition that:
      a. Reach surface water and/or reach a drainage channel tributary to a surface water; or
      b. Reach a MS4 and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond).
   ii. Category 2 – Discharges of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from an enrollee’s sanitary sewer system failure or flow condition that does not reach a surface water, a drainage channel, or the MS4 unless the entire SSO volume discharged to the storm drain system is fully recovered and disposed of properly.
   iii. Category 3 – All other discharges of untreated or partially treated wastewater resulting from an enrollee’s sanitary sewer system failure or flow condition.

4. Sanitary Sewer Overflow Reporting to CIWQS - Timeframes
   i. Category 1 and Category 2 SSOs – All SSOs that meet the above criteria for Category 1 or Category 2 SSOs shall be reported to the CIWQS Online SSO Database:
      a. Draft reports for Category 1 and Category 2 SSOs shall be submitted to the CIWQS Online SSO Database within three (3) business days of the enrollee becoming aware of the SSO. Minimum information that shall be reported in a draft Category 1 SSO report shall include all information identified in section 8.i.a. below. Minimum information that shall be reported in a Category 2 SSO draft report shall include all information identified in section 8.i.c below.
      b. A final Category 1 or Category 2 SSO report shall be certified through the CIWQS Online SSO Database within 15 calendar days of the end date of the SSO. Minimum information that shall be certified in the final Category 1 SSO report shall include all information identified in section 8.i.b below. Minimum information that shall be certified in a final Category 2 SSO report shall include all information identified in section 8.i.d below.
ii. **Category 3 SSOs** – All SSOs that meet the above criteria for Category 3 SSOs shall be reported to the CIWQS Online SSO Database and certified within 30 calendar days after the end of the calendar month in which the SSO occurs (e.g., all Category 3 SSOs occurring in the month of February shall be entered into the database and certified by March 30). Minimum information that shall be certified in a final Category 3 SSO report shall include all information identified in section 8.1.e below.

iii. **“No Spill” Certification** – If there are no SSOs during the calendar month, the enrollee shall either 1) certify, within 30 calendar days after the end of each calendar month, a “No Spill” certification statement in the CIWQS Online SSO Database certifying that there were no SSOs for the designated month, or 2) certify, quarterly within 30 calendar days after the end of each quarter, “No Spill” certification statements in the CIWQS Online SSO Database certifying that there were no SSOs for each month in the quarter being reported on. For quarterly reporting, the quarters are Q1 - January/February/March, Q2 - April/May/June, Q3 - July/August/September, and Q4 - October/November/December.

If there are no SSOs during a calendar month but the enrollee reported a PLSD, the enrollee shall still certify a “No Spill” certification statement for that month.

iv. **Amended SSO Reports** – The enrollee may update or add additional information to a certified SSO report within 120 calendar days after the SSO end date by amending the report or by adding an attachment to the SSO report in the CIWQS Online SSO Database. SSO reports certified in the CIWQS Online SSO Database prior to the adoption date of this MRP may only be amended up to 120 days after the effective date of this MRP. After 120 days, the enrollee may contact the SSO Program Manager to request to amend an SSO report if the enrollee also submits justification for why the additional information was not available prior to the end of the 120 days.

5. **SSO Technical Report**

The enrollee shall submit an SSO Technical Report in the CIWQS Online SSO Database within 45 calendar days of the SSO end date for any SSO in which 50,000 gallons or greater are spilled to surface waters. This report, which does not preclude the Water Boards from requiring more detailed analyses if requested, shall include at a minimum, the following:

i. **Causes and Circumstances of the SSO:**
   a. Complete and detailed explanation of how and when the SSO was discovered.
   b. Diagram showing the SSO failure point, appearance point(s), and final destination(s).
   c. Detailed description of the methodology employed and available data used to calculate the volume of the SSO and, if applicable, the SSO volume recovered.
   d. Detailed description of the cause(s) of the SSO.
   e. Copies of original field crew records used to document the SSO.
   f. Historical maintenance records for the failure location.

ii. **Enrollee's Response to SSO:**
   a. Chronological narrative description of all actions taken by enrollee to terminate the spill.
   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.

iii. **Water Quality Monitoring:**
   a. Description of all water quality sampling activities conducted including analytical results and evaluation of the results.
   b. Detailed location map illustrating all water quality sampling points.

6. **PLSDs**

Discharges of untreated or partially treated wastewater resulting from blockages or other problems within a privately owned sewer lateral connected to the enrollee's sanitary sewer system or from other private sanitary sewer system assets may be voluntarily reported to the CIWQS Online SSO Database.

i. The enrollee is also encouraged to provide notification to Cal OES per section B above when a PLSD greater than or equal to 1,000 gallons has or may result in a discharge to surface water. For any PLSD greater than or equal to 1,000 gallons regardless of the spill destination, the enrollee is also encouraged to file a spill report as required by Health and Safety Code section 5410 et. seq. and Water Code section 13271, or notify the responsible party that notification and reporting should be completed as specified above and required by State law.

ii. If a PLSD is recorded in the CIWQS Online SSO Database, the enrollee must identify the sewage discharge as occurring and caused by a private sanitary sewer system asset and should identify a responsible party (other than the enrollee), if known. Certification of PLSD reports by enrollees is not required.

7. **CIWQS Online SSO Database Unavailability**

In the event that the CIWQS Online SSO Database is not available, the enrollee must fax or e-mail all required information to the appropriate Regional Water Board office in accordance with the time schedules identified herein. In such event, the enrollee must also enter all required information into the CIWQS Online SSO Database when the database becomes available.

8. **Mandatory Information to be Included in CIWQS Online SSO Reporting**

All enrollees shall obtain a CIWQS Online SSO Database account and receive a "Username" and "Password" by registering through CIWQS which can be reached at CIWQS@waterboards.ca.gov or by calling (866) 792-4977, M-F, 8 A.M. to 5 P.M. These accounts will allow controlled and secure entry into the CIWQS Online SSO Database. Additionally, within thirty (30) days of initial enrollment and prior to recording SSOs into the CIWQS Online SSO Database, all enrollees must complete a Collection System Questionnaire (Questionnaire). The Questionnaire shall be updated at least once every 12 months.

i. **SSO Reports**

At a minimum, the following mandatory information shall be reported prior to finalizing and certifying an SSO report for each category of SSO:
a. **Draft Category 1 SSOs:** At a minimum, the following mandatory information shall be reported for a draft Category 1 SSO report:

1. SSO Contact Information: Name and telephone number of enrollee contact person who can answer specific questions about the SSO being reported.
2. SSO Location Name.
3. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field.
4. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure.
5. Whether or not the SSO reached a municipal separate storm drain system.
6. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.
7. Estimate of the SSO volume, inclusive of all discharge point(s).
8. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain.
9. Estimate of the SSO volume recovered (if applicable).
10. Number of SSO appearance point(s).
11. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
12. SSO start date and time.
13. Date and time the enrollee was notified of, or self-discovered, the SSO.
14. Estimated operator arrival time.
15. For spills greater than or equal to 1,000 gallons, the date and time Cal OES was called.
16. For spills greater than or equal to 1,000 gallons, the Cal OES control number.

b. **Certified Category 1 SSOs:** At a minimum, the following mandatory information shall be reported for a certified Category 1 SSO report, in addition to all fields in section 8.i.a:

1. Description of SSO destination(s).
2. SSO end date and time.
3. SSO causes (mainline blockage, roots, etc.).
4. SSO failure point (main, lateral, etc.).
5. Whether or not the spill was associated with a storm event.
6. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the overflow; and a schedule of major milestones for those steps.
7. Description of spill response activities.
8. Spill response completion date.
9. Whether or not there is an ongoing investigation, the reasons for the investigation and the expected date of completion.
10. Whether or not a beach closure occurred or may have occurred as a result of the SSO.
11. Whether or not health warnings were posted as a result of the SSO.
12. Name of beach(es) closed and/or impacted. If no beach was impacted, NA shall be selected.
13. Name of surface water(s) impacted.
14. If water quality samples were collected, identify parameters the water quality samples were analyzed for. If no samples were taken, NA shall be selected.
15. If water quality samples were taken, identify which regulatory agencies received sample results (if applicable). If no samples were taken, NA shall be selected.
16. Description of methodology(ies) and type of data relied upon for estimations of the SSO volume discharged and recovered.
17. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Database will issue a final SSO identification (ID) number.

c. **Draft Category 2 SSOs:** At a minimum, the following mandatory information shall be reported for a draft Category 2 SSO report:
   1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO.

d. **Certified Category 2 SSOs:** At a minimum, the following mandatory information shall be reported for a certified Category 2 SSO report:
   1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO and Items 1-9, and 17 in section 8.i.b above for Certified Category 1 SSO.

e. **Certified Category 3 SSOs:** At a minimum, the following mandatory information shall be reported for a certified Category 3 SSO report:
   1. Items 1-14 in section 8.i.a above for Draft Category 1 SSO and Items 1-5, and 17 in section 8.i.b above for Certified Category 1 SSO.

ii. **Reporting SSOs to Other Regulatory Agencies**

These reporting requirements do not preclude an enrollee from reporting SSOs to other regulatory agencies pursuant to state law. In addition, these reporting requirements do not replace other Regional Water Board notification and reporting requirements for SSOs.

iii. **Collection System Questionnaire**

The required Questionnaire (see subsection G of the SSS WDRs) provides the Water Boards with site-specific information related to the enrollee’s sanitary sewer system. The enrollee shall complete and certify the Questionnaire at least every 12 months to facilitate program implementation, compliance assessment, and enforcement response.

iv. **SSMP Availability**

The enrollee shall provide the publicly available internet web site address to the 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. If all of the SSMP documentation listed in this subsection is not publicly available on the Internet, the enrollee shall comply with the following procedure:
a. Submit an **electronic** copy of the enrollee’s approved SSMP, critical supporting documents referenced in the SSMP, and proof of local governing board approval of the SSMP to the 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

D. **WATER QUALITY MONITORING REQUIREMENTS:**

To comply with subsection D.7(v) of the SSS WDRs, the enrollee shall develop and implement an SSO Water Quality Monitoring Program to assess impacts from SSOs to surface waters in which 50,000 gallons or greater are spilled to surface waters. The SSO Water Quality Monitoring Program, shall, at a minimum:

1. Contain protocols for water quality monitoring.

2. Account for spill travel time in the surface water and scenarios where monitoring may not be possible (e.g. safety, access restrictions, etc.).

3. Require water quality analyses for ammonia and bacterial indicators to be performed by an accredited or certified laboratory.

4. Require monitoring instruments and devices used to implement the SSO Water Quality Monitoring Program to be properly maintained and calibrated, including any records to document maintenance and calibration, as necessary, to ensure their continued accuracy.

5. Within 48 hours of the enrollee becoming aware of the SSO, require water quality sampling for, at a minimum, the following constituents:
   i. Ammonia
   ii. Appropriate Bacterial indicator(s) per the applicable Basin Plan water quality objective or Regional Board direction which may include total and fecal coliform, enterococcus, and e-coli.

E. **RECORD KEEPING REQUIREMENTS:**

The following records shall be maintained by the enrollee for a minimum of five (5) years and shall be made available for review by the Water Boards during an onsite inspection or through an information request:

1. General Records: The enrollee shall maintain records to document compliance with all provisions of the SSS WDRs and this MRP for each sanitary sewer system owned including any required records generated by an enrollee’s sanitary sewer system contractor(s).

2. SSO Records: The enrollee shall maintain records for each SSO event, including but not limited to:
   i. Complaint records documenting how the enrollee responded to all notifications of possible or actual SSOs, both during and after business hours, including complaints that do not
result in SSOs. Each complaint record shall, at a minimum, include the following information:

a. Date, time, and method of notification.

b. Date and time the complainant or informant first noticed the SSO.

c. Narrative description of the complaint, including any information the caller can provide regarding whether or not the complainant or informant reporting the potential SSO knows if the SSO has reached surface waters, drainage channels or storm drains.

d. Follow-up return contact information for complainant or informant for each complaint received, if not reported anonymously.

e. Final resolution of the complaint.

ii. Records documenting steps and/or remedial actions undertaken by enrollee, using all available information, to comply with section D.7 of the SSS WDRs.

iii. Records documenting how all estimate(s) of volume(s) discharged and, if applicable, volume(s) recovered were calculated.

3. Records documenting all changes made to the SSMP since its last certification indicating when a subsection(s) of the SSMP was changed and/or updated and who authorized the change or update. These records shall be attached to the SSMP.

4. Electronic monitoring records relied upon for documenting SSO events and/or estimating the SSO volume discharged, including, but not limited to records from:

i. Supervisory Control and Data Acquisition (SCADA) systems

ii. Alarm system(s)

iii. Flow monitoring device(s) or other instrument(s) used to estimate wastewater levels, flow rates and/or volumes.

F. CERTIFICATION

1. All information required to be reported into the CIWQS Online SSO Database shall be certified by a person designated as described in subsection J of the SSS WDRs. This designated person is also known as a Legally Responsible Official (LRO). An enrollee may have more than one LRO.

2. Any designated person (i.e. an LRO) shall be registered with the State Water Board to certify reports in accordance with the CIWQS protocols for reporting.

3. Data Submitter (DS): Any enrollee employee or contractor may enter draft data into the CIWQS Online SSO Database on behalf of the enrollee if authorized by the LRO and registered with the State Water Board. However, only LROs may certify reports in CIWQS.

4. The enrollee shall maintain continuous coverage by an LRO. Any change of a registered LRO or DS (e.g., retired staff), including deactivation or a change to the LRO's or DS's contact information, shall be submitted by the enrollee to the State Water Board within 30 days of the change by calling (866) 792-4977 or e-mailing help@ciwqs.waterboards.ca.gov.
5. A registered designated person (i.e., an LRO) shall certify all required reports under penalty of perjury laws of the state as stated in the CIWQS Online SSO Database at the time of certification.

CERTIFICATION

The undersigned Clerk to the Board does hereby certify that the foregoing is a full, true, and correct copy of an order amended by the Executive Director of the State Water Resources Control Board.

[Signature]

Date: 7/30/13

Jeanine Townsend
Clerk to the Board
AMENDED MONITORING AND REPORTING PROGRAM FOR THE STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS FOR SANITARY SEWER SYSTEMS

BACKGROUND
Water Code section 13193 (2001, A.B. 285) requires the State Water Resources Control Board (State Water Board) and Regional Water Quality Control Boards (collectively Water Boards) to gather comprehensive and specific Sanitary Sewer Overflow (SSO) information. Water Code section 13193 also requires the Water Boards to make available to the public information including but not limited to the cause, estimated volume, location, date, time, and duration of the SSO; whether the SSO reached or may have reached surface waters; the response and corrective action taken by the collection system owner or operator (hereafter, Enrollee) for each SSO event; and the contact information for each Enrollee.

On May 2, 2006 the State Water Board adopted Water Quality Order 2006-0003-DWQ, “Statewide Waste Discharge Requirements for Sanitary Sewer Systems” (hereafter, SSS WDRs) to address Water Code section 13193 requirements and develop the framework for the statewide Sanitary Sewer Overflow Reduction Program. The SSS WDRs’ Monitoring and Reporting Program (MRP) includes specific SSO notification and reporting and record keeping requirements to meet SSO reporting requirements in the Water Code and facilitate compliance monitoring and enforcement for violations.

The State Water Board Executive Officer issued a revised MRP for the SSS WDRs on February 20, 2008 to rectify notification deficiencies that occurred early in program implementation and to ensure that first responders (e.g., Water Boards, California Office of Emergency Services, and County Health Departments) are notified in a timely manner for SSOs discharged to surface waters. Based on over six years of implementation of the SSS WDRs, the State Water Board concluded that the February 20, 2008 revised MRP is no longer adequate to advance the Sanitary Sewer Overflow Reduction Program objectives, assess compliance, and enforce the requirements of the SSS WDRs.

Following its January 24, 2012 workshop with stakeholders for the review and update of the SSS WDRs, the State Water Board directed staff to review and evaluate the existing monitoring and reporting requirements and prepare an amended MRP for the Executive Director’s issuance. Staff worked with the key stakeholders (e.g., California Association of Sanitation Agencies) to revise the monitoring and reporting requirements. State Water Board staff distributed the draft versions of the MRP to all stakeholders registered on the Lyris e-mail list for the Sanitary Sewer Overflow Reduction Program, solicited comments on the draft versions of the MRP in January and March 2013, and considered all comments received in developing the final revised MRP.
INSPECTION AND AUDIT FINDINGS

Since January 2007, numerous violations of the SSS WDRs have been documented by the Water Boards through data review, compliance monitoring, and onsite inspections. The most common violations related to the MRP that the Water Boards have documented are:

- Failure to properly estimate and report SSO volumes discharged and recovered [violation of section G of the SSS WDRs]

- Failure of the Enrollee to comply with all minimum MRP record keeping requirements [violation of section G of the SSS WDRs]

- Failure of the Enrollee to implement feasible alternatives and actions necessary to identify and correct problems causing SSOs [violation of subsection D.6 of the SSS WDRs]

- Unauthorized use of legally responsible official's SSO Online Database login password and electronic signature; [violation of section J of the SSS WDRs]

- Failure of the Enrollee to develop and/or implement an Overflow Emergency Response Plan to ensure 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 accelerated or additional monitoring necessary to determine the nature and impact of the SSO [violation of subsection D.13(vi) of the SSS WDRs]

- Failure of the Enrollee to implement required training for sewer system operators and contractors [violation of subsections D.13(iv) and D.13(vi) of the SSS WDRs]

Amendments made to the MRP in Order 2013-0058-EXEC address these and other issues that have become apparent in the implementation of the SSS WDRs in over six years.

MONITORING AND REPORTING PROGRAM AMENDMENTS

State Water Board staff and other members of the Data Review Committee reviewed the current SSS WDRs reporting requirements as part of the SSS WDRs review and update process. The Data Review Committee is open to all stakeholders. Consequently, enrollees, non-governmental organizations, and other agencies have participated. As a result of this process, new reporting requirements have been developed that address the compliance and enforcement issues noted above and improve the quality and usefulness of SSO data collected.

While the proposed changes streamline the reporting process overall, some fields have been added to the reports. These additions address critical information gaps in the current reporting that have been identified both internally and by stakeholders.

For example, many enrollees have noted that we need to be able to separate sewer lateral spills from spills occurring in other asset types like main lines or pump stations. The "where did the failure occur" question on the electronic spill report form was not a required field in the original or revised 2008 MRP. Many SSO reports do not have this information, thus, we cannot differentiate lateral spills from main line, pump station, or other types of spills. This is one example of the additions in the required data entry that have been addressed in the 2013 MRP revisions.
The following is a summary of major changes made to the existing MRP (Order 2008-0002-EXEC) and incorporated in the final revised MRP (Order 2013-0058-EXEC):

1. Change in Notification Requirement for spills that reach surface water:
   - Three notification calls were required (California Office of Emergency Services, Regional Water Quality Control Boards, and local Health Departments). Required notification has been changed to call California Office of Emergency Services (Cal OES) only since Cal OES notifies the Regional Water Quality Control Boards and local Health Departments when a spill notification is received.
   - Elimination of requirement to submit a certification to Regional Water Quality Control Boards within 24 hours of making notification calls.
   - Alignment of notification requirement with California Code of Regulations section 2250, Reportable Quantity of Sewage, by requiring notification calls for only spills of 1,000 gallons or more. Notification of Cal OES was required for all spills to surface water.
   - Addition of requirement to update Cal OES when there are substantial changes to previously reported spill volume estimates or impacts.

2. Defined new spill categories and refined spill report fields:
   - Replacement of spill Categories 1 and 2 with Categories 1, 2, and 3. Spills are now classified as follows:
     - Category 1 – Spills of any volume that reach surface water
     - Category 2 – Spills greater than or equal to 1,000 gallons that do not reach surface water
     - Category 3 (formerly Category 2) – Spills less than 1,000 gallons that do not reach surface water

   All spills to surface water will be in a distinct category with this change. Spill reporting fields were refined and streamlined with stakeholder input.

3. Addition of requirement to submit a technical report within 45 days of the end date for spills to surface water over 50,000 gallons.

4. Addition of requirement for all Permit enrollees to develop a Water Quality Monitoring plan to be implemented within 48 hours after initial notification for spills where 50,000 gallons or more reach surface water.

5. Addition of requirement for Permit enrollees to submit an electronic copy of their Sewer System Management Plan (SSMP) or provide the web address where their SSMP is posted.

6. Addition of enhanced record keeping requirements.

7. Elimination of requirement to certify Private Lateral Sewer Discharge reports.

8. Addition of a 120-day time limit for amending and re-certifying spill reports.
Appendix E - Internal Audit on Inglewood SSMP

Parties attended and interviewed:

Thomas Lee, Jose Ramirez, Kenrick Sanderlin, Brian Ball, William Payne, Roosevelt Robinson, and Mauricio Paredes.

Discussion:

Inglewood Sewer System has gotten a new Vactor Truck for service. In addition, a new 2000-gallon water truck is being procured.

Finally, Inglewood Sewer system has also installed about 45 “Smart Covers” throughout the city to alarm the city crew/workers for any possible sewer overflow. The advance notice gives City crew a 2-hour window to break the stoppage before it becomes an SSO discharge of sewage that will go into our storm drains. In the near future, City will add more “Smart Covers” to the sewer system.

SSO reporting documents on record:

From August/2018 to June/2021, City of Inglewood had no city owned SSO’s (Sanitary Sewer Overflows) during these months. “No Spill” Reports were filed in the CWIQS system.