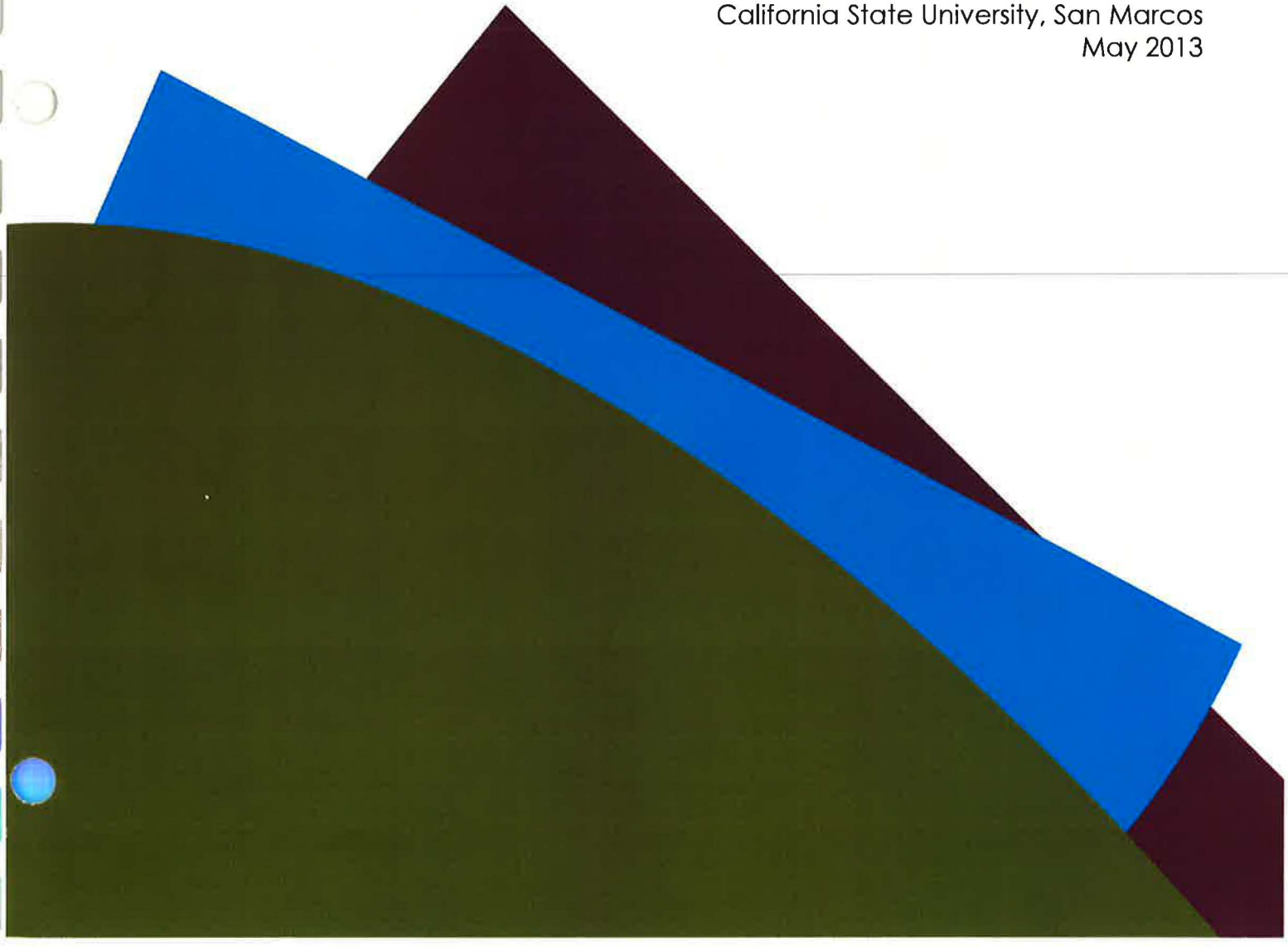
ATKINS

California State University San Marcos Campus

Sanitary Sewer Overflow Emergency Response Plan

Prepared for:
California State University, San Marcos
May 2013



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Abbreviations

Cal EMA	California Emergency Management Agency
CFR	Code of Federal Regulations
CIWQS	California Integrated Water Quality System
CSUSM	California State University San Marcos
CWA	Clean Water Act
CWEA	California Water Environment Association
IC	Incident Commander
LRO	Legally Responsible Official
MRP	Monitoring and Reporting Program
NPDES	National Pollutant Discharge Elimination System
PVC	Polyvinyl Chloride
SDRWQCB	San Diego Regional Water Quality Control Board
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflows
SSOERP	Sanitary Sewer Overflow Emergency Response Plan
SWRCB	State Water Resources Control Board
VWD	Vallecitos Water District
VCP	Vitrified Clay Pipe
WDR	Waste Discharge Requirements

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Section 1
Introduction

California State University San Marcos (CSUSM) has prepared this Sanitary Sewer Overflow Response Plan (SSOERP) because Sanitary Sewer Overflows (SSOs) of various volumes may occur in spite of concerted prevention efforts. SSOs may occur from blocked sewers, pipe failures, mechanical malfunctions, and other natural or man-made causes. Facility Services crews are constantly on alert and ready to respond upon notification and confirmation of an SSO.

This SSOERP established the formal procedures for CSUSM staff to respond to, contain, correct, and clean up SSOs, and it is intended to minimize the effects of SSOs on the environment while protecting the public's health and safety. Chapter 1 provides an overview of the wastewater collection system, the purpose and goals of the SSOERP, the regulatory authority requiring this plan, an overview of this document's organization, and definitions of terms contained in this document.

1.1 Wastewater Collection System Overview

The CSUSM sanitary sewer system is composed of a network of Polyvinyl Chloride (PVC) pipe of various sizes. The individual building service connections tie into several of the campus' private mains that ultimately tie into the Vallecitos Water District's sanitary sewer system mains which are located in the streets surrounding the campus. Due to the topography of the campus site, wastewater flows generated from different parts of the campus are collected by three separate networks of sewer mains. The network assets, consisting of sewer pipelines, manholes, and cleanouts, are identified using an established sequential numbering system for the manholes and junctions/nodes. The following includes a summary of each network currently serving the CSUSM campus.

- **Network No. 1:** Flows from campus facilities located in the southern portion of campus are conveyed in a westerly direction. The network consists of 4- and 6-inch pipelines that discharge to an 8-inch main in Palm Canyon Drive, then to a 10-inch PVC main in Craven Drive, and ultimately to the existing Vallecitos Water District 15-inch vitrified clay pipe (VCP) in Twin Oaks Valley Road.

- **Network No. 2:** Flows from buildings located in the central and northern parts of the campus are conveyed in a northerly direction. The network consists of 6-inch and 8-inch pipelines that discharge to an 8-inch main located in Campus Way which ultimately discharges into an existing 15-inch VCP main in Barham Drive.

- **Network No. 3:** Flows generated from the facilities located along the eastern edge of the campus are conveyed to the 12-inch Vallecitos Water District main located in La Moree Road.

1.2 Purpose and Objective

CSUSM recognizes the importance of protecting the health and safety of the public as well as the environment by preventing sewer flows from reaching surface waters and waters of the United States. CSUSM also understands the necessity to implement procedures to comply with the requirements of state regulations. The overall objective in establishing an official SSOERP is to ensure that CSUSM staff responds appropriately and efficiently to all known SSOs.

The objectives of the SSOERP can be summarized as:

- Protect public health and safety and the environment;
- Minimize the effects of SSOs;
- Satisfy regulatory and discharge permit conditions;
- Protect private and public property;
- Protect CSUSM personnel; and
- Protect all CSUSM owned assets.

This purpose of the SSOERP is to document guidelines and measures to protect public health and the environment in the event of an accidental overflow. SSOERP is intended to supplement and be consistent with existing emergency plans and standard operating procedures currently implemented by CSUSM staff. The overall plan will facilitate coordination and mobilization of necessary facilities and personnel in an organized and efficient manner when responding to an SSO.

1.3 Organization of the SSOERP

This document provides the necessary guidelines for CSUSM staff to respond to an SSO occurrence. This SSOERP contains the following elements:

- Introduction
- Sanitary Sewer Overflow Response Procedures
- Public Advisory of Sewage Contamination Procedures
- SSO Reporting Requirements
- Training and Safety Requirements
- SSOERP Updating Requirements
- Various Appendices

1.4 Background for Legal Authority

The following regulatory requirements establish the impetus for CSUSM to develop and follow procedures to minimize SSOs.

California Water Code Section 13271, California Code of Regulations

Section 13271 of the California Water Code, Title 23 of the California Code of Regulations, prohibits the discharge of sewage and hazardous material into the waters of the State and requires the proper notification of authorized agencies in the event of an SSO. Entities which do

not properly follow the requirements of this section may be found guilty of a misdemeanor and punished by fine, imprisonment, or both.

California Waste Discharge Requirements for Sanitary Sewer Systems

On May 2, 2006, the State Water Resources Control Board (SWRCB) adopted the Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems, Order No. 2006-0003. The WDRs are applicable to 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 publicly owned treatment facilities in the state of California. Specifically, the WDRs, as part of the Monitoring and Reporting Program, require that CSUSM establish monitoring, record keeping, reporting, and public notification requirements for SSOs, including on-line reporting requirements through the State's California Integrated Water Quality System (CIWQS) web-site. The WDRs required that CSUSM began on-line reporting on January 2, 2007, and that CSUSM prepare an Emergency Response Plan by November 2, 2009. This SSOERP fulfills the later requirement and documents CSUSM's efforts to comply with the on-line reporting.

On February 20, 2008, the SWRCB adopted Order No. WQ 2008-0002-EXEC, which amends the Monitoring and Reporting Program No. 2006-0003-DWQ of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. The amendment serves to ensure that the agencies that have first responder duties are notified in a timely manner in order to effectively protect public health and the beneficial uses of potentially affected water. The Order requires the following:

1. For any discharges of sewage that result in a discharge to a drainage channel or a surface water, the Discharger shall, as soon as possible, but not later than two hours after becoming aware of the discharge, notify the State Office Emergency Services (recently renamed and referred to as Cal EMA), the local health officer or directors of environmental health with jurisdiction over affected water bodies, and the appropriate Regional Water Quality Control Board.

2. As soon as possible, but no later than 24 hours after becoming aware of a discharge to a drainage channel or a surface water, the Discharger shall submit to the appropriate Regional Water Quality Control Board a certification that the State Office of Emergency services and the local health officer or directors of environmental health with jurisdiction over the affected water bodies have been notified of the discharge

Clean Water Act, Section 1251 of Chapter 33 of the United States Code

In 1972, the federal Congress enacted the Federal Water Pollution Control Act, commonly known as the Clean Water Act (CWA). The CWA prohibits the discharge of pollutants, including sewage, into public waters of the United States. The federal government has the authority to enforce compliance with the CWA via specific permits, such as National Pollutant Discharge Elimination System (NPDES) permits, as well as court action such as administrative orders and consent decrees.

1.5 Regulatory Requirements

The WDRs require that CSUSM develop and implement an overflow emergency response plan which identifies measures to protect public health and the environment. At a minimum, the 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 potential affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the Monitoring and Reporting Program (MRP). All SSOs shall be reported in accordance with these MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The Sewer System Management Plan (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.

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 and may be necessary to determine the nature and impact of the discharge.

SSOs are caused by a blockage or a restriction in the wastewater collection system, pipe failures, flows exceeding the capacity of the system, and other natural or man-made causes. In the event of an SSO, CSUSM Facility Services staff in conjunction with Risk Management and Safety staff must respond and be prepared to:

- Contain the SSO
- Control the overflow
- Mitigate and clean up the contaminated area
- Notify the appropriate authorities

1.6 Definition of Terms

Category 1 Sanitary Sewer Overflow

All discharges of sewage resulting from a failure in CSUSM's wastewater collection system that:

- Equals or exceeds 1,000 gallons; or
- Results in a discharge to a drainage channel and/or surface water; or
- Discharges to a storm drain and was not fully captured and returned to the wastewater collection system.

Category 2 Sanitary Sewer Overflow

All non-Category 1 SSO discharges of sewage resulting from a failure in CSUSM's wastewater collection system.

First Responder

CSUSM's Facility Services staff person who is initially notified of a possible SSO and arrives first at the reported location of the possible or actual SSO.

Public Waters

Any body of water such as the ocean, bay, lake, pond, river, stream, or creek where there is the potential for human contact as defined by the County of San Diego Department of Environmental Health.

Sanitary Sewer Overflow

A sanitary sewer overflow (SSO) is any overflow, spill, release, discharge, or diversion of sewage from a wastewater collection system. SSOs include:

- Release of untreated or partially treated sewage that reaches waters of the United States;
- Release of untreated or partially treated sewage that does not reach waters of the United States; and
- Sewage backups into buildings and private property that are caused by blockages or flow conditions in a wastewater collection system, other than a building lateral. Sewage backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is an SSO when sewage is discharged off a private property into streets, storm drains, or waters of the state.

Sewage

Any liquid waste and water borne solid waste resulting from residential, commercial, industrial, or institutional activities or uses.

Surface Waters

All permanent and intermittent drainage ways, lakes, and reservoirs, either public or private, which are not man-made for the treatment of municipal, agricultural, or industrial waste, and are wholly or partially within the boundaries of CSUSM. SSOs to storm drains tributary to surface waters shall be reported as discharges to surface waters.

Wastewater

Any volume of untreated or partially treated sewage discharged from the wastewater collection system upstream of a wastewater treatment plant.

Wastewater Collection System

Any system of pipes, pump stations, sewer lines, etc., used to collect and convey sewage to a treatment plant. Temporary storage and conveyance facilities (such as vaults, temporary piping, construction trenches, wet wells, impoundments, tanks, high-lines, etc.) are considered to be part of the sanitary sewer system, and discharges of sewage to these facilities are not sanitary sewer overflows.

Waters of the State

Any surface water or groundwater (including saline waters) within the boundaries of the state.

Waters of the United States

All waters of the United States as defined in the Code of Federal Regulations, Volume 40, Section 122.2 (40 CFR 122.2) such as navigable waters, rivers, streams, lakes, natural ponds, wetlands, etc., including tributaries to traditional navigable waters.

Section 2
SSO Response Procedures

SSOs are caused by a blockage or a restriction in the wastewater collection system, pipe failures, flows exceeding the capacity of the system, and other natural or man-made causes. In the event of an SSO, CSUSM Facility Services staff must respond and be prepared to:

- Contain the SSO,
- Mitigate the overflow,
- Clean up the contaminated area, and
- Notify the appropriate authorities.

Facility Services staff is primarily responsible for responding to potential or actual SSOs. This section presents a strategy for Facility Staff to mobilize labor, materials, tools, and equipment to contain, mitigate, and clean-up residuals from sewer overflow and correct or repair any condition which may cause or contribute to a sewage discharge. The plan is applicable to a wide range of potential system failures that could create an SSO. Figure 2-1 summarizes the process and offers a concise overview of the following steps required to quickly respond to an actual or possible SSO incident.

The following includes a summary of the responsibilities of the departments primarily responsible for implementing the SSOERP.

2.1 Receipt of Information of Possible SSOs

Suspicious circumstances, such as foul odors, backed up plumbing, unusual flooding, may indicate the possibility of an actual or impending SSO. In the event of an SSO that may affect CSUSM system operations and/or may become a public health issue, personnel from Facility Services and Risk Management and Safety staff is utilized.

The following includes a summary of the general responsibilities of the departments primarily responsible for implementing the SSOERP.

Facility Services:

1. Acting Incident Commander (IC)
2. Coordinate and implement response activities necessary to contain, control, isolate and mitigate the SSO
3. Implement preventative measures to minimize the potential for future SSOs
4. Perform online reporting within allocated time frame

Risk Management and Safety:

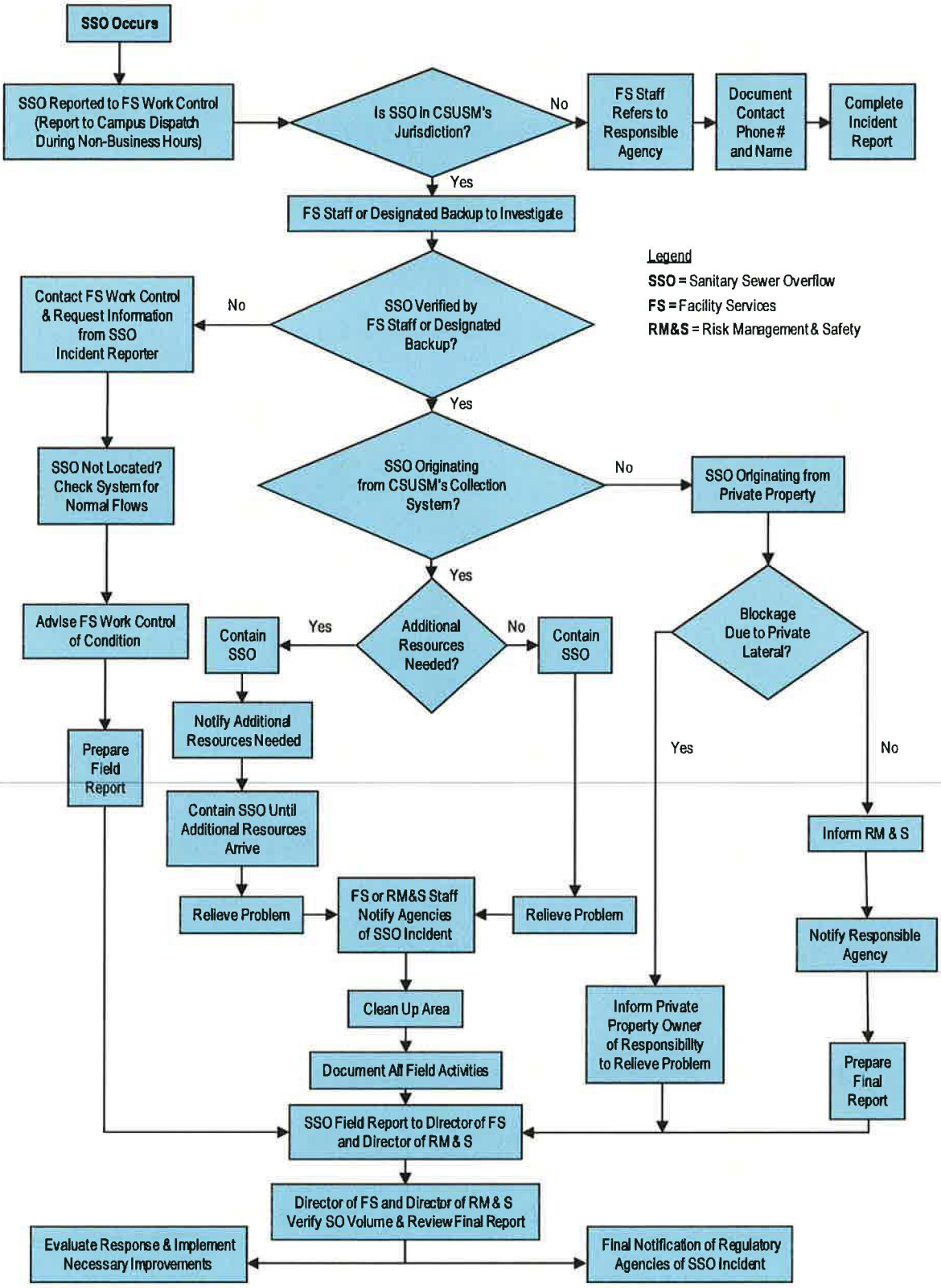
1. Perform external agency notification
2. Interface with external regulatory agencies

Illustrated in Figure 2-2, is the notification process of a potential SSO that will be reported directly to the Facility Services Department, during normal business hours. During non-business hours, weekends, and designated CSUSM holidays, calls will be received by CSUSM's dispatch center and forwarded to the Director of Facility Services, Director of Risk Management and Safety or the designated on-call staff.

Upon receipt of a notification of a potential SSO, the dispatch personnel will obtain all relevant information available regarding the possible overflow including:

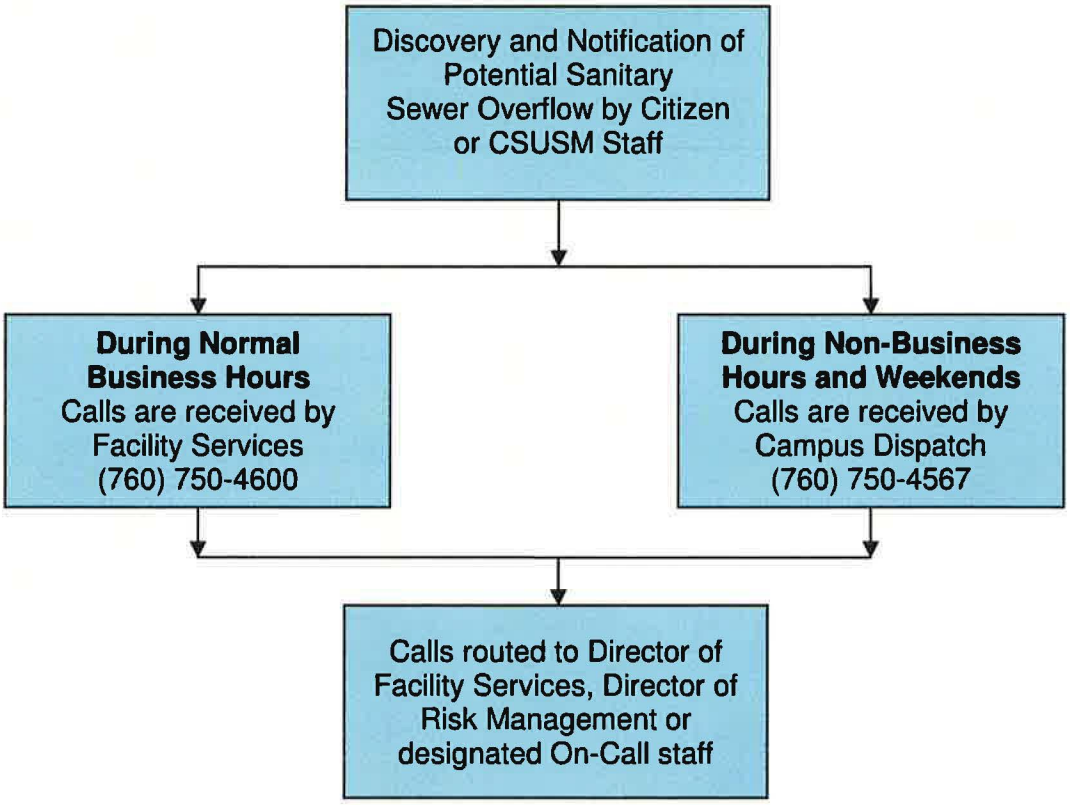
- Time and date the call/SSO report was received,
- Specific location of actual or impending SSO,
- Description of the problem,
- Time the possible SSO was noticed by the caller,
- Caller's name and telephone number,
- Observations by the caller (e.g. odor, duration), and
- Other relevant information that will enable the responding staff to locate, assess, contain, and relieve the SSO.

Figure 2-1 Sanitary Sewer Overflow Emergency Response Procedure



Campus dispatch will immediately notify the Director of Facility Services and/or Risk Management and Safety or designated back-up, also referred to as the IC for SSOs. Response time to an SSO will be less than an hour after the initial call.

Figure 2-2 Process for Alerting Staff of a Possible Sanitary Sewer Overflow



2.2 Facility Services Personnel Notifications of Possible SSOs

Possible and actual SSOs detected by campus personnel in the course of their normal duties are reported immediately to Facility Services. For incidents that occur during normal business hours, staff closest to the location of the incident will be dispatched to the reported SSO location. Personnel on-site observing the SSO should begin efforts to contain and minimize the effects of the SSO.

2.3 Incident Commander Responsibilities

Based on the information provided during the initial notification of a possible or actual SSO, personnel will contact the Director Facility Services or the designated back-up. The Director of Facility Services or the designated back-up shall proceed to the SSO location to assess the cause and extent of the SSO. The Director of Facility Services or the designated back-up to arrive first at the location is considered the IC. The IC will determine whether to direct additional

maintenance crews and/or other approved contractors to the SSO location if the SSO cannot be fully contained or recovered or if it has reached public waters. The IC will:

1. Determine and assess the cause of the SSO, e.g. sewer line blockage, pipeline break, failure of equipment, etc.;
2. Identify and request, if necessary, additional personnel, materials, and equipment necessary to minimize, contain, or isolate the impact of the SSO;
3. Control public access to affected area;
4. Use appropriate protective equipment and safety precautionary measures, and implement Lockout/Tag-Out protocol as applicable;
5. Obtain necessary equipment and implement measures to respond to spill; and
6. Coordinate with hazardous materials response teams if a suspicious substance (e.g. oil sheen, foam) or odor (e.g. gas) is present.

If the IC determines the SSO is not within CSUSM's jurisdiction, the IC should notify the responsible agency to respond to the overflow. If the SSO poses an imminent danger to the public, public health, property, or to public waterways of the United States, then the IC should take prudent emergency actions to mitigate the SSO until staff of the responsible agency arrives.

If the IC cannot locate the SSO or the reported problem, he shall attempt to obtain additional information from the initial caller or Campus Dispatch personnel to clarify reported data and to locate the problem. If the SSO or reported problem still cannot be located, the IC shall notify the Campus Dispatch of the status and prepare a report.

2.4 Requesting Additional Resources

If the IC determines that notification of additional staff beyond the "standby" SSO response crew is required and/or approved contractors are necessary to fully contain and recover the overflow, the IC will mobilize the additional resources necessary.

Facility Services staff has access to additional resources that include on-call contactors that can be mobilized in case of an emergency or major SSOs. Vendors and contractors are retained on an annual basis. A list of approved contractors is available from the Facility Services Department upon request.

2.5 Overflow Containment, Correction, and Clean-up

The Facility Services Department shall respond with its staff, equipment, and/or contractors and, under most circumstances, perform the tasks necessary to properly and effectively correct, contain, and clean up SSOs. Facility Services staff has the skills and experience to respond rapidly and in the most appropriate manner without producing a problem elsewhere in the system. In responding to an SSO, Facility Services staff shall:

- Protect public health, the environment, and property from SSOs and restore the surrounding area back to its original condition;
- Contain the sewage discharged to the maximum extent possible and prevent the discharge of sewage into surface waters;
- Control traffic and crowds to limit public access;
- When appropriate, promptly notify regulatory agencies of preliminary SSO information and potential impacts; and
- Minimize CSUSM's exposure to any regulatory agency penalties and fines

Of critical importance with respect to an emergency response is to ensure that the temporary actions necessary to divert flows and fix the problem do not produce a problem elsewhere in the system. If the matter is not handled properly, subsequent sewer system back-ups may occur and create other SSOs.

The SSO Response Flowchart shown in Figure 2-1 illustrates emergency response procedures including notification and request of additional resources as required in the event of a large SSO.

Initial Containment Measures

The following are specific actions to be performed by the response crews in the event of an SSO:

- Determine the immediate destination of the overflow (e.g. street curb gutter, storm drain, drainage channel, creek bed, body of water, etc.)
- Take immediate steps to contain and recover the overflow (e.g. block storm drain, recover sewage with available equipment, dig or construct a containment pond, divert flow into a downstream manhole
- Identify and request, as necessary, assistance or additional CSUSM or Contractor resources (material and equipment) to contain or isolate the overflow
- As necessary, secure the affected area and post warning signs
- Clean and sanitize the affected area(s)
- Finalize incident documentation
- Review overall response with responding parties
- Sample as necessary. Any sampling performed will be conducted by the Risk Management & Safety Department staff

Correction of SSO Cause

Once the SSO has been contained and the cause determined, efforts to correct the cause of the SSO should commence. These efforts may involve, but not be limited to, removing the pipe blockage by flushing or rodding and repairing a damaged pipeline or manhole. Care must be taken to prevent additional SSOs from occurring as a result of the corrective action taken to resolve the identified problem.

Clean-up

All SSO sites must be thoroughly cleaned as soon as possible after an overflow. No readily identifiable reside (e.g. sewage solids, papers, plastics, etc.) is to remain. Clean-up of all SSOs will be handled according to the following procedures:

- The SSO site must be secured to prevent contact by members of the public until the site has been thoroughly cleaned.
- Where practical, the area shall be thoroughly flushed and cleaned of any sewage or wash-down water using a high pressure water hose or vactor truck; wash-down water shall be contained and recovered; solids and debris shall be flushed, swept, raked, or manually removed, and hauled away for proper disposal.
- Where appropriate (typically in areas with hard surfaces), areas that were in contact with the sewage shall be cleaned using an approved sanitizing agent and deodorizer.
- If sewage discharged into a body of water that may contain fish or other aquatic life, sanitizing agent will not be applied and the appropriate agency will be contacted.
- Where sanitizing agents are utilized, all contaminants shall be contained and collected for proper disposal.
- Where sewage resulted in ponding, the pond must be pumped dry and the residue removed and disposed of properly.

2.6 Traffic Control

The purpose of traffic control is to limit public access to areas potentially impacted by un-permitted discharges of sewage. Traffic control measures may include the following as deemed appropriate:

- Set up cones to direct traffic away from spill area
- Perform lane closures as necessary
- Place proper signage for any lane closures and contaminated area signs
- Close affected entrances or exits from public facilities
- Place caution tape and barricades to protect pedestrians from contaminated area
- Coordinate with regulatory agencies to inform public of hazards

2.7 Preliminary Assessment of Damage to Private and Public Property

Initial assessment of the SSO site is performed by the IC, who is a Facility Services staff member or the designated backup person. The IC will determine whether the SSO originated from the CSUSM collection system, a private business, or residence. Once the source of the SSO is determined, containment and cleanup procedures are executed, and a *Sanitary Sewer Overflow Field Report* (Appendix A) will be completed.

CSUSM Source SSO

If it is determined that the source of the SSO is from the campus wastewater collection system, containment and cleanup procedures are executed to prevent the SSO from reaching adjacent private properties, local water bodies, and the storm drain system. Once the SSO is contained and cleaned, proper documentation utilizing the appropriate forms will be completed.

If it is determined that the SSO has reached a private residence or business, the SSO is reported to CSUSM's Risk Management Department personnel prior to responding CSUSM staff leaving the site. Risk Management and Safety personnel will be directed on how to proceed.

Private Source SSO

If it is determined that the source of the SSO is from a private property, the IC and crews will use discretion in assisting the property owner/occupant as reasonable as they can. CSUSM staff is cautioned that CSUSM and responding crews may be liable for further damages inflicted to private property during such assistance. If CSUSM Facility Services staff enters private property, it should be with the express permission of the owner/occupant of the property. CSUSM staff should not enter private property for the purpose of assessing damage. While the public property, crews are directed to take appropriate still photographs and video footage, if possible, of the surrounding and impacted area in order to thoroughly document the nature and extent of the impacts. Photographs and/or video footage should be filed with the *Sanitary Sewer Overflow Field Report*.

2.8 Notification Requirements

The volume, impact, and location of an SSO determine the level of notifications required to comply with regulatory requirements. Table 2-1 provides a summary of the agencies that should be notified and when they are to be notified of an SSO as soon as practicable without impeding containment or other emergency response measures. CSUSM is not required to send reports to the San Diego Regional Water Quality Control Board (SDRWQCB); this reporting is achieved using the web-based on-line SSO reporting system, CIWQS, which is further described in Chapter 4.

Additionally, CSUSM is required to, as soon as possible, but no later than 24 hours after becoming aware of a discharge to a drainage channel or surface water, submit to the SDRWQCB a certification that the Cal EMA and the local health officer or directors of the environmental health with jurisdiction over the affected water bodies have been notified of the discharge.

Table 2-1 SSO Notification Requirements for Regulatory Agencies

Agency/Official	Reasons to Notify	When to Notify
University Police Department, Emergency Services	Public Safety concerns, such as assistance with traffic control	Immediately
California Emergency Management Agency (Cal EMA)	Category 1 SSO conditions	Within 2 hours of notification of SSO
	A sewage discharge to a drainage channel and/or surface water, or a discharge to a storm drain pipe that is not fully recovered	Within 2 hours of becoming aware of discharge
County of San Diego Department of Environmental Health	A sewage discharge to a drainage channel and/or surface water, or a discharge to a storm drain pipe that is not fully recovered	Within 2 hours of becoming aware of discharge
San Diego Regional Water Quality Control Board (SDRWQCB)	Category 1 or Category 2 SSO Conditions	Within 24 hours of notification of SSO
	A sewage discharge to a drainage channel and/or surface water, or a discharge to a storm drain pipe that is not fully recovered	Within 2 hours of becoming aware of discharge
San Diego County Flood Control District	A sewage discharge to a drainage channel and/or surface water, or a discharge to a storm drain pipe that is not fully recovered	As soon as practicable
California Department of Fish and Game-South Coast Region	A sewage discharge to a drainage channel and/or surface water, or a discharge to a storm drain pipe that is not fully recovered	As soon as practicable

Subsequent to notification of the appropriate parties on the SSO Notification list, Risk Management and Safety staff will contact all other regulatory agencies as required. Contact information is provided in Table 2-2.

Table 2-2 SSO Regulatory Agency Notification List

Contact List	Telephone Number	Non-Business Hours
Vallecitos Water District	760-744-0460	-
California Emergency Management Agency (Cal EMA)	916-845-8991	500-852-7550
San Diego Regional Water Quality Control Board (SDRWQCB)	858-637-5581	858-822-8344
San Diego County Flood Control District	858-565-5262	858-565-5262
California Department of Fish and Game-South Coast Region	858-467-4201	-
San Diego County Storm Water Management Program	888-846-0800	888-846-0800

2.9 Monitoring and Mitigation

The IC who confirmed the SSO must ensure that the provisions of the SSOERP and other directives are met. CSUSM staff shall conduct an assessment of the impacts following an SSO and appropriately mitigate and monitor the site for potential future SSOs and to prevent SSOs from reoccurring. The SDRWQCB in conjunction with the Risk Management & Safety Department will determine the extent of the water quality testing that is required to be conducted based on the volume and location of the SSO. The types and frequency of the testing to be performed is generally based on the estimated volume of the SSO and the affected or potential affected body of water. For SSOs that reach surface waters, monitoring and testing activities may include:

- Obtaining water quality samples
- Gathering samples upstream and downstream of any location where the SSO reached surface water
- Logging the sample location, time, and water temperature on the chain of custody form
- Creating a map of the sample locations so that follow-up testing can be performed
- Collecting samples at the location where the SSO entered the water. When taking the sample, submerge the bottle below the surface of the water with the cap on. Once the bottle is under the surface, remove the cap and fill the bottle. Gloves should be worn while sampling to avoid infecting any open wounds
- Analyzing the sample for at least the following constituents:
  - Ammonia Nitrogen
  - Biochemical Oxygen Demand
  - Dissolved Oxygen
  - Total Fecal Coliform
  - Total Suspended Solids
  - Additional sampling requirements as imposed by the SDRWQCB

2.10 SSO Documentation

Documenting SSOs and the causes provides information for:

- Management for performance measurement and decision-making
- Regulators to meet established reporting requirements
- Planning future maintenance and repair activities
- Engineering determinations regarding capacity, rehabilitation, or replacement
- Reference for historical performance or claims

It is the responsibility of the Director of Facility Services and Director of Risk Management and Safety to ensure that the SSO is properly investigated, documented, and recorded. The minimum information required from the investigation is:

- Cause of SSO
- Volume of SSO including volume released and volume recovered
- Location of point discharge;
- Ultimate destination of the SSO
- Impact and extent of impact
- Estimated start time of SSO
- Time CSUSM received notification of SSO
- Arrival time of crew(s) and time to correct the SSO
- End time of SSO
- Water body impacted and results of bacteriological monitoring, if applicable;
- Actions taken to mitigate the SSO
- Notification to regulators and others

A variety of approaches exists for estimating SSO volumes. Appendix C provides guidance on estimating the amount of sewage that escaped from the wastewater collection system and the amount of sewage recovered.

Once the results of the SSO investigation are completely documented on the *Sanitary Sewer Overflow Report*, a copy of the form shall be provided to the Director of Facility Services. The Director of Facility Services shall follow up, in person or by telephone, with the person(s) initially reporting the SSO. The cause of the SSO and its resolution will be disclosed.

Section 3
Public Advisory of Sewage Contamination Procedures

This Chapter provides a description of the actions that CSUSM staff will implement to limit public access to surface waters and other areas potentially impacted by SSOs originating from the wastewater collection system.

The Department of Risk Management & Safety has the primary responsibility for determining when to post notices of polluted surface waters or ground surfaces that resulted from the wastewater discharges from its facilities. Beyond CSUSM's jurisdiction, the County of San Diego Department of Environmental Health may also make a determination and direct CSUSM to post notices. The postings shall provide a warning of potential public health risks due to sewage contamination and shall be done as soon as practicable following the initial response to the overflow. An example of a sign is included in Appendix D.

Staff shall regularly inspect the posted notices and replace any missing or damaged warning signs. Posted notices shall not be removed until it is determined that the threat to public health and safety is eliminated or at the direction of the San Diego Department of Environmental Health.

Should additional notification of sewage contamination be deemed necessary, Facility Services and Risk Management and Safety staff in cooperation with CSUSM's Office of Communications to provide further notices through the use of pre-scripted notices made available to the printed or electronic news media for immediate publication or airing, or by other measures. Notices should be prepared to accurately reflect the conditions at the time of publication and/or airing.

Section 4
SSO Reporting Requirements

Facility Services and Risk Management and Safety staff shall monitor and report SSOs, regardless of size and recovery, origination from the CSUSM wastewater collection system. This chapter details the reporting procedures necessary to comply with SWRCB and CSUSM requirements.

4.1 SSO Identification, Tracking, and Logging

A work order must be created to track and monitor each SSO event. Using a completed *Sanitary Sewer Overflow Field Report* form (Appendix A) and a completed *Sanitary Sewer Overflow Report* for (Appendix E), the Director of Facility Services and/or Director of Risk Management and Safety can create or update the work order and enter the necessary data from the forms. All forms, documentation, and monitoring results should be kept with the work order.

SSOs are divided into three categories:

- **Category 1 Sanitary Sewer Overflow:** All discharges of sewage resulting from a failure in CSUSM's wastewater collection system that:
  - Equals or exceeds 1,000 gallons; or
  - Results in a discharge to a drainage channel and/or surface water; or
  - Discharges to a storm drain and was not fully captured and returned to the wastewater collection system.
- **Category 2 Sanitary Sewer Overflow:** All non-Category 1 SSO discharges of sewage resulting from a failure in CSUSM's wastewater collection system.
- **Private Lateral Sewage Discharge:** Sewage discharges that are caused by blockages or other problems within a privately owned lateral.

Figure 4-1 is a flow chart that will guide CSUSM staff in determining the category classification of an SSO, and the reporting requirements necessary.

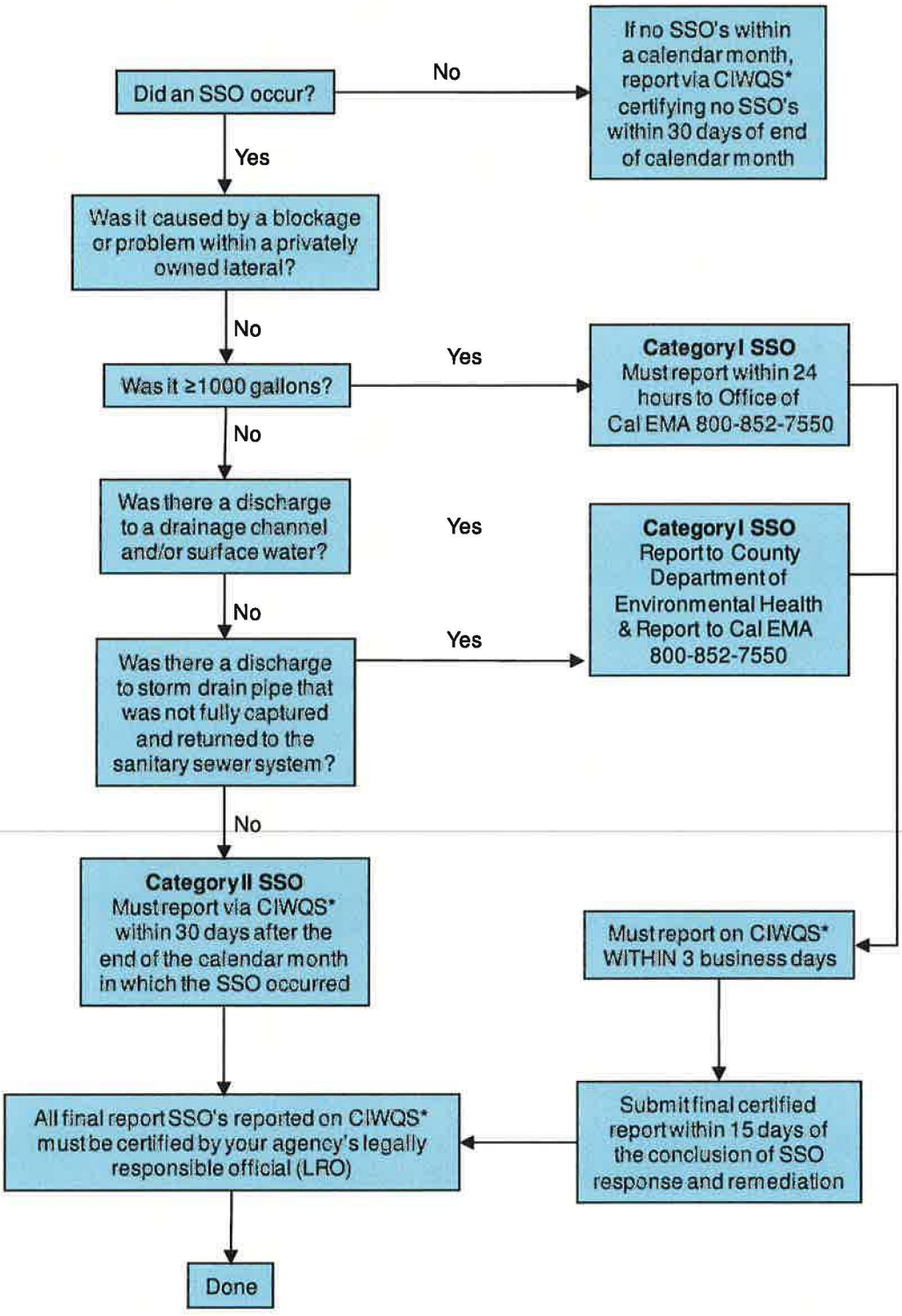
4.2 On-Line Reporting Requirements

The WDRs require that CSUSM report SSOs using the CIWQS, an internet-based reporting system. This section describes the reporting procedures.

Reporting Authority and Access

At a minimum, CSUSM is required to have one Legally Responsible Official (LRO) who is registered with the State of California to officially sign and certify SSO reports submitted via the CIWQS web-sit. Currently, the Director of Facility Services is identified as CSUSM's LRO.

Figure 4-1 Sanitary Sewer Overflow Reporting Requirements



* California Integrated Water Quality System – If CIWQS is not available, you must FAX to San Diego Regional Water Quality Control Board at 858-571-6972

CSUSM must also identify Data Submitters. These are individuals registered with the State to enter SSO data, create and edit SSO reports, and review data. Data Submitters cannot certify report. Data Submitters are typically the ICs to an SSO location, or the person who collects the SSO data for reporting purposes. CSUSM can identify and register as many Data Submitters as deemed necessary.

All LROs and Data Submitters receive a unique log-in identification and password. This information should be guarded and protected. If an authorized user suspects his or her log-in and password has been lost, stolen, or otherwise compromised, that person shall contact the SWRCB via the CIWQS help desk at 866-792-4977.

Mandatory information to Report via CIWQS

Specific mandatory information must be included for each SSO report submitted via CIWQS, prior to finalizing and certifying an SSO report.

The following information is required for all Category 2 SSOs:

1. Location of SSO using Global Positioning System (GPS) coordinates
2. Regional Water Quality Control Board, (CSUSM is in Region 9)
3. County in which SSO occurred (San Diego County)
4. Whether the SSO entered a drainage channel and/or surface water
5. Whether the SSO was discharged into a storm drain pipe that was not fully captured and returned to the wastewater collection system
6. Estimated SSO volume in gallons
7. SSO source (e.g., manhole, cleanout, pipeline, etc.)
8. SSO cause (e.g., mainline blockage, roots, grease, etc.)
9. Time of SSO notification or discovery
10. Estimated operator arrival time
11. SSO destination
12. Estimated SSO end time

The following information is required for all Category 1 SSOs:

1. All information listed for Category 2 SSOs
2. Estimated SSO volume that reached surface water, drainage channel, or not recovered from a storm drain
3. Estimated SSO volume recovered
4. Response and corrective action taken
5. If bacteriological samples were taken, identify which regulatory agencies received sample results; if no samples were taken, then N/A must be selected.
6. The parameters that samples were analyzed for (if applicable)
7. Whether health warning signs were posted
8. Beach(es) impacted, if none then N/A must be selected
9. Whether there is an ongoing investigation

10. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the SSO and a schedule of major milestones for those steps
11. Cal EMA control number (if applicable)
12. Date Cal EMA was initially called (if applicable)
13. Time Cal EMA was initially called (if applicable)
14. Identification of whether County of San Diego Department of Environmental Health Officers were called
15. Date County of San Diego Department of Environmental Health Officers were initially called (if applicable)
16. Time County of San Diego Department of Environmental Health Officers were initially called (if applicable)

The CIWQS reporting requirements are not in lieu of other reporting requirements. CSUSM must also perform Regional Board reporting requirements, the Governor's Cal EMA reporting, and notifications to the County of San Diego Department of Environmental Health.

Once the data is properly entered into the CIWQS database, and the SSO investigation is complete, the SSO report must be certified by the LRO based on the reporting requirements summarized in Table 4-1.

Table 4-1 CIWQS Reporting Time Requirements

SSO Type	Initial CIWQS Report	Certification Requirements
Category I SSO	Within 3 business days	Within 15 days of the conclusion of the SSO response and remediation
Category II SSO	Prior to Certification	Within 30 days after the end of the month in which the SSO occurred
No Monthly SSO	N/A	Within 30 days after the end of the month in which the SSO occurred

Monthly Reporting Requirement if no SSOs

For each month that no SSOs are identified and reported via CIWQS, CSUSM's LRO must prepare and submit a statement in the CIWQS SSO Database, certifying that there were no SSOs for the designated month. This report must be submitted within 30 days after the end of each calendar month with no SSOs, as noted in Table 4-1.

Alternative Reporting Procedures when On-Line Reporting is Unavailable

In the event that the CIWQS SSO On-line Database is not available to submit required reports or certify reports, CSUSM staff must fax all required information to the SDRWQCB office in accordance with the time schedules identified in Table 4-1. CSUSM is also obligated to enter all required information into the On-line SSO Database as soon as practicable.

4.3 Record Keeping and Document Retention

CSUSM must retain individual SSO records for a minimum of five years from the date of the SSO occurrence. This period may be extended when requested by a SDRWQCB Executive Officer. All records shall be made available for review upon State or Regional Board staff's request.

Specific records that must be retained include, but are not limited to:

- Certified reports as submitted on-line;
- Original recordings of continuous monitoring efforts;
- SSO call logs;
- Action(s) or planned action(s) to prevent future SSOs from recurring;
- Work orders, work completed, and maintenance records associated with responses and investigations of SSO related problems;
- A list and description of complaints from customers or others; and
- Documentation of performance and implementation measures.

To facilitate CSUSM's ability to report regularly on SSOs, the Director of Facility Services and Director of Risk Management and Safety should track information pertaining to each SSO. The Director of Facility Services and/or Director of Risk Management and Safety should document data as soon as practicable after an SSO event. This data can be queried for trends and used as a cross reference for the on-line SSO reporting requirements.

Section 5
Training

Appropriate staff will participate in regularly scheduled training sessions to assist response crews in awareness of their responsibilities and executing their duties. These training sessions will be organized based on the latest SSOERP, as well as other reference materials. Training sessions should incorporate hands-on field demonstrations to insure the preparedness of all response personnel to all anticipated situations.

An overview of the SSMP and the SSOERP should be provided to all appropriate staff. This will serve as a mode of instructing staff on the SSMP, SSOs, and required documentation. Field demonstrations will be performed to test equipment, response time, training effectiveness, resources, and manpower capabilities.

Training and event participation will be documented and maintained. Currently, Facilities Services staff is encouraged to receive training through various vendors and to participate in Collection System Maintenance classes, and obtain Wastewater Treatment Certification through the California Water Environment Association (CWEA). Additional certification requirements may be imposed in the future if deemed necessary by the SDRWQCB.

Section 6
Updating the SSOERP

This SSOERP reflects CSUSM's established procedures for responding to reports of possible and confirmed SSOs originating from its wastewater collection system. As policies change and response procedures are refined, the SSOERP will be reviewed and modified to reflect all necessary changes.

6.1 SSOERP Availability

The SSOERP will be reviewed annually to ensure that all information is updated. The amended SSOERP will be distributed to the appropriate staff, CSUSM Departments, SDRWQCB, and be made available to the public for review. Staff shall ensure that this SSOERP is readily available to wastewater maintenance personnel, and that said personnel are familiar with the plan and comply with it at all times.

6.2 Review and Update of the SSOERP

CSUSM staff shall maintain this SSOERP, and amend or update it as necessary by the addition of new facilities, or changes in the operation or maintenance of the wastewater collection system that may materially affect the potential for SSOs. At a minimum, the plan will be reviewed annually and will include updating telephone numbers and forms in the appendices and a review of procedures. The annual review of the plan will also ensure all provisions of the plan are being met and implemented. CSUSM staff shall also review and amend this SSOERP as appropriate after any SSO occurrence. SSOERP deficiencies and updates will be addressed and modified accordingly. The plan performance will be routinely evaluated, reviewed and updated.

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APPENDIX A

Sanitary Sewer Overflow Field Report

CALIFORNA STATE UNIVERSITY OF SAN MARCOS
SANITARY SEWER OVERFLOW FIELD REPORT

PART A: INITIAL NOTIFICATION **Tracking #** _____

Date Reported: _____ Time Reported: _____ (00:00)

Reported by – Name: _____ Phone Number: _____

Address or Agency: _____

Location of Overflow: _____

Cross Street: _____ Thomas Brothers Grid: _____

Reason for call-out: ☐ Stoppage/Overflow ☐ Other: _____

Stoppage in: ☐ Mainline ☐ Private Lateral Sewer Overflow Structure ID: _____

Cause of Stoppage: _____

Responsible Party: ☐ CSUSM ☐ Private ☐ Other: _____

PART B: INITIAL RESPONSE

Time Arrived at Site: _____ Responding Supervisor: _____

Crew Members: _____

Date Overflow Started: _____ Date Overflow Stopped: _____

Time Overflow Started: _____ Time Overflow Stopped: _____

Est. Overflow Rate (gpm): _____ Est. Overflow Volume (gal): _____

Duration of Flow: _____ Overflow Volume Recovered (gal): _____

Reach Storm Drain: ☐ Yes ☐ No Final Destination of Overflow: _____

Reach Surface Water: ☐ Yes ☐ No If YES, Name of Surface Water: _____

Pictures/Video Taken: ☐ Yes ☐ No Samples Taken: ☐ Yes ☐ No

Location of Blockage: USMH DS MH Overflow Manhole: MH _____

Signs Posted: ☐ Yes ☐ No Sewer Main or Private Lateral: _____

Barricade: ☐ Yes ☐ No County Health Dept. Notified: ☐ Yes ☐ No

Cause of Overflow: (Check All that Apply)

☐ Blockage	☐ Roots	☐ Grease
☐ Flood/Rain	☐ Infiltration	☐ Line Break
☐ Construction	☐ Private Property	☐ Vandalism
☐ Rocks	☐ Debris	☐ Manhole
☐ Unknown	☐ Other: _____	

Containment Materials: _____ Responsible Agency: _____

Cleanup Method: _____

*Sketch Area on Back of Sheet

SKETCH OF AREA: **(Include manholes, intersections, location of blockage, etc.)**

Completed by:_____ **Agency:**_____ **Date:**_____

APPENDIX B

Approved Contractors and Equipment Vendors

Approved Contractors and Equipment Vendors

Contractors:

Contractor Name	Address	Telephone No.	Contact Name	Services Provided
				Drain Cleaning, Jetting, and Repair
				Leak Repair
				Cable Repair and Replacement

Note: Vendors and contractors are retained annually. The list of vendors and contractors selected is available upon request.

Equipment Vendors:

Vendor Name	Address	Telephone No.	Contact Name	Available Equipment
				Piping Products
				Pumping Systems
				Staff Training and Consultation

Note: Vendors and contractors are retained annually. The list of vendors and contractors selected is available upon request.

APPENDIX C

Spill Estimate Methods

Possible Methods for Estimating Spill Volume

A variety of approaches exist for estimating the volume of a sanitary sewer overflow. This attachment documents four methods that are most often employed. Other methods are also possible. The person preparing the estimate shall use the method most appropriate to the SSO in question using his/her judgment. Every effort shall be made to make the best possible estimate of the volume.

Method 1 Eyeball Estimate

The volume of very small SSOs can be estimated using an "eyeball estimate." To use this method, imagine the amount of water that would spill from a bucket or a barrel. A bucket contains 5 gallons and a barrel contains 50 gallons. If the SSO is larger than 50 gallons, try to break the standing water into barrels and then multiply by 50 gallons. This method is useful for contained spills up to 100 gallons.

Method 2 Measured Volume

The volume of some small SSOs can be estimated using this method if it is not raining. In addition, the shape, dimensions, and depth of the spilled sewage are needed. The shape and dimensions are used to calculate the area of the spill and the depth is used to calculate the volume.

Step 1: Sketch the shape of the contained sewage

Step 2: Measure or pace off the dimensions

Step 3: Measure the depth in several locations

Step 4: Convert the dimensions, including depth to feet

Step 5: Calculate the area using the following formulas:

Rectangle	Area = length x width
Circle	Area = diameter x diameter x 0.785
Triangle	Area = base x height x 0.5

Step 6: Multiply the area times the depth

Step 7: Multiply the volume by 7.5 to convert it to gallons

Method 3 Duration and Flow Rate

Calculating the volume of SSOs where it is difficult or impossible to measure the area and depth requires a different approach. In this method separate estimates are made of the duration of the SSO and the flow rate. The methods of estimating duration and flow rate are:

Duration: The duration is the elapsed time from the start time to the end time, when the SSO stopped.

Start time is sometimes difficult to establish. Here are two approaches:

- For very large overflows, changes in flow on a downstream flow meter can be used to establish the start time. Typically the daily flow peaks are "cut off" or flattened by the loss of flow. This can be identified by comparing hourly flow data.
- Conditions at the SSO site change with time. Initially there will be limited deposits of grease and toilet paper. After a few days to a week, the grease forms a light colored residue. After a few weeks to a month the grease turns dark. In both cases the quantity of toilet paper and other materials of sewage origin increase in amount. These changes with time can be used to estimate the start time in the absence of other information.
- Sometimes it is simply not possible to estimate the start time.

End time is usually much easier to establish. Field crews on-site observe the "blow down" that occurs when the blockage has been removed. The "blow down" can also be observed in downstream flow meters.

Flow Rate: The flow rate is the average flow left in the sewer system during the time the SSO stopped. There are three ways to estimate the flow rate:

- San Diego Manhole Flow Rate Reference Sheet: This sheet, presented on the following page, shows the sewage flowing from a manhole cover for a variety of flow rates. The observations of the field crew are used to select the approximate flow rate from the chart.
- Flow meter: Changes in flows in the downstream flow meters can be used to estimate the flow rate during the spill (better for large SSOs)
- Estimate based on up-stream connections: Once the location of the SSO is known, the number of upstream connections can be determined from system maps. Multiply the number of connections by 200 to 250 gallons per day per connection, or 8 to 10 gallons per hour per connection, or other flow rates that are consistent with the City's data for its connections.

Once duration and flow rate have been estimated, the volume of the SSO is the product of the duration in hours or days times the flow rate in gallons per hour or gallons per day.

City of San Diego
Metropolitan Wastewater Department

Reference Sheet for Estimating Sewer Spills from Overflowing Sewer Manholes

All estimates are calculated in gallons per minute (gpm)

Wastewater Collection Division
(619) 654-4160

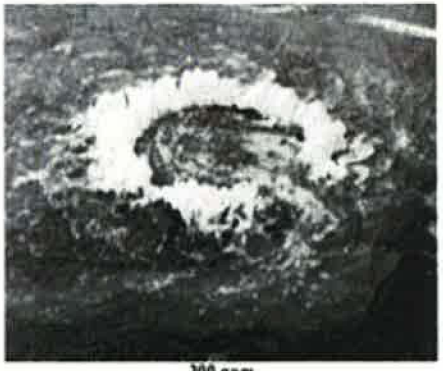

5 gpm


25 gpm


50 gpm

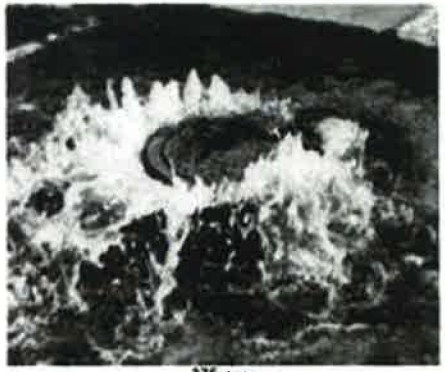

100 gpm


150 gpm


200 gpm


225 gpm


250 gpm


275 gpm

All photos were taken during a demonstration using metered water from a hydrant in cooperation with the City of San Diego's Water Department.

rev. 4/99

APPENDIX D

Warning Posting

WARNING!

RAW

SEWAGE

CALIFORNIA STATE UNIVERSITY
SAN MARCOS

FACILITY SERVICES
(760) 750-4600

APPENDIX E

Sanitary Sewer Overflow Reporting Form

CALIFORNIA STATE UNIVERSITY SAN MARCOS
SANITARY SEWER OVERFLOW REPORT

CIWQS Identifier: _____ **Tracking #**_____

This report is: ☐ Preliminary ☐ Final ☐ Revised

Reporting Details

Name & Title of Person Completing this Report:_____

Phone #_____ Date:_____ Time:_____(00:00)
(24-hour clock)

Name of Person/Agency First Reporting SSO:_____

Phone #_____ Date:_____ Time:_____(00:00)
(24-hour clock)

Location of Overflow

Street Address: _____Nearest Cross Street:_____

Thomas Brothers Grid:_____ Latitude of SSO:_____Longitude of SSO:_____

City: _____ County: San Diego Zip:_____

Location of Potential Blockage or Problem Point: Network:_____ From MH#: _____To MH#:_____

SSO Appearance Point: ☐Building ☐Manhole ☐Sewer ☐Other:_____

Terrain at SSO Location: ☐Flat ☐Mixed ☐Steep

Diameter of Sewer:_____in Material of Sewer:_____ Estimated Age:_____yrs

SSO Details

Estimated Overflow **START**: Date:_____ Time:_____(00:00)
(24-hour clock)

Estimated **ARRIVAL** of Operator: Date:_____ Time:_____(00:00)
(24-hour clock)

Estimated Overflow **STOP**: Date:_____ Time:_____(00:00)
(24-hour clock)

Duration of Spill (in minutes) = _____ Minutes

Estimated Overflow Rate: _____gpm Total Volume of SSO: _____gal

SSO Volume Recovered: _____gal SSO Volume Lost: _____gal

SSO Cause: ☐Debris ☐Flow Exceeded Capacity ☐FOG ☐Blockage ☐Roots ☐Infiltration
☐Operator Error ☐Structural Problem ☐Vandalism ☐Power Failure ☐Construction
☐Rainfall ☐Other:_____

If wet weather caused the SSO, chose storm size:
☐1yr ☐2yr ☐5yr ☐10yr ☐50yr ☐100yr ☐>100yr ☐Unknown

SSO Destination Details

SSO Final Destination: ☐Building ☐Paved Surface ☐Unpaved Surface ☐Storm Drain

☐Drainage Channel ☐Curb & Gutter ☐Surface Water ☐Other:_____

If SSO reached a storm drain, give street location (Specify N/S/E/W side):_____

Describe distance (feet) and path taken from SSO to storm drain inlet:_____

_____

If SSO reached surface waters, describe Receiving Waters:_____

If applicable, name and/or describe Secondary Receiving Water:_____

Response

Response Activities (Check ALL that Apply): ☐Contained All or Part of SSO ☐Restored Flow

☐Returned All or Part of SSO to Sewer ☐Cleaned Up ☐CCTV

☐Other:_____

Responding Personnel:	Time Arrived:	Time Departed:
_____	_____	_____
_____	_____	_____
_____	_____	_____

Equipment Used:_____

Other Responding Agency/Contractor:_____

_____

SSO Clean-up Details

Materials Used for Containment:_____

Washwater Disposal Method:_____

Volume of Washwater Used: _____gal

Combined Volume of Recovered Washwater and Sewage-Contaminated Water: _____gal

Combined Volume of Lost Washwater and Sewage-Contaminated Water: _____gal

Miscellaneous (*Attach photos, correspondence, or follow-up reports that provide detailed information.*)

Remarks:_____

_____

_____

_____

Prevention Plan

Steps, taken or planned, to reduce or eliminate re-occurrence of SSO:_____

_____

_____

Schedule of any MAJOR milestones or improvements:_____

_____

Steps, taken or planned, to mitigate the impacts of the SSO:_____

_____

_____

Schedule of any MAJOR milestones or improvements:_____

_____

Notification Contact List (*Check all who were notified.*)

Name/Agency	Phone #	Time	Date
☐ Regional Board (SDRWQCB)	(858) 673-5581	_____	_____
☐ Vallecitos Water District	(760) 744-0460	_____	_____
☐ California Emergency Management Agency (CalEMA)	1-800-852-7550	_____	_____
☐ County of San Diego Department of Environmental Health	1-800-852-7550	_____	_____
☐ Risk Management & Safety Office	(760) 750-4502	_____	_____
☐ University Police Department	(760) 750-4567	_____	_____
☐ San Diego Flood Control District	(858) 565-5262	_____	_____
☐ California Department of Fish &Game	(858)467-4201	_____	_____
☐ San Diego County Stormwater Management Program	(858) 846-0800	_____	_____
☐ Other_____	_____	_____	_____

MUST notify CalEMA, County of San Diego Department of Environmental Health, and SDRWQCB within **2 HOURS** of becoming aware of an SSO reaching storm pipes, drainage channels, and/or surface waters

CalEMA Control #_____

Report faxed to SDRWQCB? ☐Yes ☐No If yes, date and time of fax:_____

Public Use Closures

Were signs posted warning of contaminants? ☐Yes ☐No Dates Posted:_____

Location of Postings:_____

Were samples obtained of contaminated water? ☐Yes ☐No (Attach any and all results.)