

Section 6.0: Overflow Emergency Response Plan

6.1 Regulatory Requirements

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 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.
- f. A program to ensure that all responsible 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.

6.1.a. Proper notification procedures that the primary responders and regulatory agencies are informed of all SSOs in a timely manner.

The VRSD & TSD Sewage Spill Procedures (Spill Procedures) are a four step procedure which directs TSD staff in SSO Notification, Clean Up, Posting and Sampling, and Reporting requirements. Step 1: Notification starts with the spill being reported to the supervisor. The supervisor will immediately report the spill via the Proposition 65 reporting form to Ventura County Environmental Health Department (EHD). If the spill reaches the waters of the State, the supervisor will contact the State Office of Emergency Services (OES) and Regional Water Quality Control Board (RWQCB) within two (2) hours after the reported spill. The Sanitary Sewer Overflow & Backup Response Plan

(Response Plan) further insures that the TSD representatives follow established guidelines in clean up and decontamination of sewer spills which may occur within the TSD service area.

The TSD encourages citizens to report overflows to the TSD. Citizens may use the TSD telephone number (805) 658-4605 to report overflows and other sewer problems during regular business hour from 8:00 AM – 5:00 PM. Once this plan is adopted by the TSD board, the SSMP along with emergency phone numbers will be available on the TSD website. In addition, staff is available 24 hours per day, seven days per week to receive calls through Dial Security at (805) 389-9406. Once verified, all sewer overflows regardless of volume or potential impact are reported to all parties in the chain of communication (Figure 2.2) within the TSD and to the appropriate regulatory agencies, as detailed on the Spill Procedure and Response Plan. When an overflow is due to private construction activities, the construction contractors are required to report the overflow to the TSD immediately.

6.1.b. A program to ensure an appropriate response to all overflows.

The Spill Procedures and Response Plan both require full, immediate, and appropriate attention and response to an SSO with the ultimate goal of minimizing impacts to public health and safety and the environment. It is the TSD procedure that “Every reported sewage spill affecting public or private property within the TSD shall be acted upon by the TSD.” Telephone calls to report overflows or other maintenance problems are answered 24 hours per day, 7 days per week. Crew leaders are immediately notified upon receipt of a reported potential sewer overflow and are instructed to respond immediately. The Spill Procedures and Response Plan provide the guidelines for assessing the overflow, notifying supervisor, documenting the overflow, estimating the volume of the overflow, sampling and laboratory analysis, posting warning signs and following up. The highest priorities are to contain the overflow and minimize, if not prevent the overflow from reaching the storm drain system, and to minimize or eliminate exposure to the public and impact on public health. Both the Spill Procedures and Response Plan are designed to protect public health and safety, meet all regulatory reporting requirements, and ensure immediate and effective response.

Construction contractors are required to have an approved sewage flow bypass system and Emergency Response Plan in place prior to start of construction. Contractors are instructed to take immediate action to stop any overflow. These are discussed at the pre-construction conference and enforced by the TSD.

6.1.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.

The Response Plan outlines notification steps and includes a comprehensive contact and notification list. Notification depends on the severity and potential impact of the overflow. All sewer overflows that enter the waters of the State such as ocean and waterways must be reported immediately. For the purposes of reporting to the EHD, the term “immediate” is defined as within two (2) hours of becoming aware of an overflow event. Immediate reporting is made when an overflow results in a direct discharge into the waters of the State and/or when the TSD representative determines that an overflow could potentially reach the waters of the State based on their knowledge of the sewer and storm drain infrastructure. All other overflows must be reported to the EHD, the OES and the RWQCB within two (2) hours of knowledge of the overflow event. In addition, immediate notification of the public, health agencies, and others of overflows “that may imminently and substantially endanger human health” is required. Initial notification includes posting warning signs and barricades as necessary by the responding crews. Appropriate agencies and impacted entities are notified in accordance with TSD procedures. The notification lists are updated to keep officials names and positions current.

Construction contractors are required to take immediate measures to mitigate and report overflows as soon as they are discovered. The TSD inspectors report construction-related overflows to the TSD and document the time, location, cause, estimated quantity, and any impact of the overflow, and take mitigation measures as needed.

The Spill Procedures and Response Plan have both been prepared to meet the requirements set in the Regional Board WDR, Monitoring and Reporting Program (MRP), California Water Codes, and other State Laws relating to SSOs.

6.1.d. Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained.

The Spill Procedures and Response Plan are clearly documented and available to all personnel. This document is used as a resource in emergency response training. All wastewater operation and maintenance staff are trained on emergency response procedures. New employees receive this training as part of their orientation and this training is reinforced during tailgate training sessions. The TSD emphasizes its goal to have no construction-related overflows during pre-bid and pre-construction meetings. Construction contractors are required to submit and obtain approval of all flow bypasses and emergency response plans prior to the start of construction.

The TSD prepares employees to respond to major emergencies and disasters and has established the VRSD Disaster Operation Plan - 2005. This Plan is a living document and is kept current due to continued equipment, process changes, and as regulations evolve. This plan establishes the chain of command, and identifies the response team member’s duties. The disaster coordinator, assistant disaster coordinators, and site coordinators are identified and the team’s responsibilities are listed. Each facility’s vulnerability and damage assessments are identifies, the critical process is ranked, and

potential hazards to personnel, property, and the environment are listed along with a list of damage assessment actions.

Training comes under various TSD programs. It includes formal classroom, informal on-the-job, and hands-on training. Training is facilitated by both TSD staff and by outside training workshops. Most of the internal functional and safety training is provided through TSD and a California Sanitary Risk Management Authority (CSRMA). Training courses are added and existing courses are modified to stay current with the rapidly changing technology and requirements, including computer-aided and online training. On-the-job cross training is actively pursued to ensure staff has a proficient working knowledge of each and every specific part of a task. TSD staff is cross-trained to ensure critical tasks are completed without interruption. Task proficiency is a requirement for all job positions and promotions, and training records are maintained to monitor completed classes and schedule employee training.

Crews are initially trained in the proper operation and maintenance of all new major mobile equipment and facilities by the contractor/manufacturer. Written operation and maintenance manuals are used as resource material for initial start-up training as well as new staff training. The TSD supervisor is responsible for providing operational training on sewer cleaning inspection equipment.

Safety training is an integral part of the TSD training program. Staff member receives formal safety training, hazardous materials management, and confined space entry as required by regulations.

6.1.e. Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities.

The TSD has developed and implemented an advanced and comprehensive overflow prevention, response and reporting program. These include timely reporting to the impacted agencies and stakeholders, templates for estimating overflow volume, training for overflow review, and follow-up CCTV inspection to accurately determine cause and prevention methods.

Adequate staff is placed on standby status to supplement existing staff as needed or respond to an emergency after hours. The TSD maintains a list of pre-qualified on-call contractors who provide specific equipment, materials, and crews to the TSD in emergency operations including traffic control. In addition, the Police Department and Fire Department can be utilized to assist in emergency situations including traffic and crowd control.

6.1.f. A program to ensure that all responsible 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.

The TSD seeks to protect public health and safety and the environment through the implementation of all Federal and State laws, standards, and orders applicable to untreated wastewater. Through a comprehensive and systematic program of cleaning, condition assessment, repair and upgrade of its sewer system, the TSD controls the discharge of untreated and partially treated wastewater into receiving waters such as ground water, streams, and rivers.

When an overflow occurs, the highest priorities are to contain the overflow and minimize, if not prevent, the overflow discharge into the storm drain system, and to minimize or eliminate exposure to the public and impact on public health. The Spill Procedures and Response Plan provide guidance to the crews in order to accomplish this objective.

A comprehensive investigation is performed for each overflow event to diagnose cause and take remedial measures to prevent and mitigate similar future events. The problematic area requiring more frequent cleaning are added to the Hot Spot Map Book with revised cleaning schedule, pertinent information, and is identified in the OASIS/SEMS Collection System Software Database as a Hot Spot.

References

Ventura Regional Sanitation District & Triunfo Sanitation District Sewage Spill Procedure

Ventura Regional Sanitation District Disaster Operations Plan, 2005

Triunfo Sanitation District, Sanitary Sewer Overflow & Back-Up Response Plan, Feb 20, 2006

California Sanitation Risk Management Authority, Policy & Procedure Memorandum #9-L, Residential Sewer Response and Claims Handling, August 17, 2007