

**CITY OF NEWPORT BEACH
DRAFT SANITARY SEWER OVERFLOW
EMERGENCY RESPONSE PLAN**



**PREPARED FOR THE
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION
ORDER NO. R8-2002-0014
GENERAL WASTE DISCHARGE REQUIREMENTS**

JANUARY 1, 2003

Forward

The City of Newport Beach is pleased to submit the Sanitary Sewer Overflow Emergency Response Plan (SSOERP) in accordance with the time schedule detailed in Order R8-2002-0014 (Sewer WDR), Section C (12). The SSOERP generally follows the chronological procedures for receiving information on a possible sewer spill then dispatching response staff, performing all required fieldwork and reporting back to regulatory agencies (including the Regional Board) on these activities. We believe that this document satisfies the requirements of Section C (12)(vii) of the Order.

Note: The SSOERP does not fully cover all standards, procedures, and requirements within this document. Doing so would create redundancy and confusion with existing procedures and programs. Therefore, the SSOERP refers to existing documents, which describe the details of the actual procedures to be followed in various steps. This allows for easy reference and simple modification of the more minor stand-alone elements of the plan. Any revision of these elements will remain in conformance with the requirements of the SSOERP, which was written to comply with the Sewer WDR.

SANITARY SEWER OVERFLOW EMERGENCY RESPONSE PLAN

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I. AUTHORITY

- A. The California Regional Water Quality Control Board (RWQCB), Santa Ana Region, issued Order No. R8-2002-0014 (commonly referred to as the Sewer Waste Discharge Requirements for Orange County, aka Sewer WDR) to the City of Newport Beach and other collection agencies on April 6, 2002. The intent of the Order is to insure that collection agencies within the Santa Ana Region of Orange County provide adequate and appropriate system capacity, maintenance and operation, emergency sewer spill response, and legal authority to reduce or eliminate sewage discharges to state waters.
- B. The City of Newport Beach owns and operates the sanitary sewer collection system within the City limits (*exceptions are documented*). As the “operator” of the sewer system, the City of Newport Beach has the right and responsibility to properly fund and maintain the system, and respond to spills as prescribed in the Sewer WDR. There are areas within the City’s boundaries, which are served by the Orange County Sanitation District (“OCSD”), the Irvine Ranch Water District (“IRWD”) and the Costa Mesa Sanitary District (“CMSD”). In the event of an emergency, the City of Newport Beach will utilize its resources to mitigate any problem that arises within its corporate boundaries in conjunction with the aforementioned agencies.
- C. The City of Newport Beach Municipal Code (NBMC) has references to industrial waste and violations for incidents that are not in conjunction with this code. The City intends to amend and update Chapter 14 of the NBMC to bring it more in alignment with the SSMP and the WDR requirements.

The City of Newport Beach is responsible for utilizing the aforementioned Municipal Codes to control and prevent future spills from occurring from private property. This responsibility is prescribed in part in the Enforcement Consistency Guide developed by the County of Orange and required by Order No. R8-2002-0010 (commonly known as the MS4 NPDES Permit). Additionally, the City of Newport Beach is required, in the Legal Authority Section [C.12(iii)(D)] of the Sewer WDR, to develop and implement the legal authority to “limit fats and greases and other debris that may cause blockages in the sewage collection system.”

II. GENERAL

The Sanitary Sewer Overflow Emergency Response Plan (SSOERP) is designed to ensure that every report of a sewer overflow is immediately dispatched to the appropriate crews so the report can be confirmed and the effects of the overflow can be negated or minimized with respect to the impacts to public health and adverse effects on beneficial uses of waters of the state. The SSOERP further includes provisions to ensure safety pursuant to the directions provided by the Orange County Health Care Agency (OCHCA), and Occupational Health and Safety Agency (OSHA) that notification and reporting is made to the appropriate local, state and federal authorities [RWQCB, OCHCA, Office of Emergency Services (OES)].

A. Objectives

The primary objectives of the SSOERP are to protect public health, the environment, and the beneficial uses of the receiving waters. Additionally, the SSOERP is intended to comply with conditions of the Sewer Waste Discharge Requirements, and minimize the liability in potential enforcement actions or third party lawsuits involving the City of Newport Beach.

Additional objectives of the SSOERP are as follows:

- Provide appropriate customer service;
- Protect wastewater collection system personnel;
- Protect the collection system and all appurtenances;
- Protect private and public property beyond the collection system; and
- Provide clearly documented policies, procedures and guidelines for City staff to reference and follow.

This plan shall not supersede existing emergency plans or standard operating procedures (SOPs) unless directed by the Utilities Director or the Utilities Operations Manager, and shall, in most cases, refer to these plans and will work in conjunction rather than conflict with them. The existing plans referenced have been reviewed and are consistent with the objectives of this plan.

B. Organization of Plan

The key elements of the SSOERP are addressed individually as follows:

Section III	Notification Procedures, Call Routing and Dispatch
Section IV	Overflow Containment, Correction and Clean-up
Section V	Reporting
Section VI	Follow-up Procedures
Section VII	Update and Distribution of Plan
Section VIII	Definitions

C. Sanitary Sewer Overflow Tracking

Four processes will be implemented to track sewer overflows. These are:

- Initial Report. This report is the initial summary of information typically received from citizens or City staff. The procedure for report taking and information distribution are listed in Section III of the SSOERP.
- Five-Day Report. This report (required by Section C.2. of the Monitoring and Reporting Program in the Sewer WDR) is completed and submitted to the RWQCB within five business days of the date when the spill is brought to the attention of City staff. Information on the completion, distribution and tracking of these reports can be found in Section V of the SSOERP, as well as in the Utilities Employee Handbook.
- Monthly Report. This report (required by Section C.5. of the Monitoring and Reporting Program in the Sewer WDR) is a summary of information on all spills occurring within the Newport Beach jurisdiction in a calendar month. Information on the completion, distribution and tracking of these reports can be found in Section V of the SSOERP.
- Report on Trends. This report (required by Section (iv)(C) of the Sewer WDR) is intended to identify and illustrate trends in overflows, such as frequency and volume. This will be developed as part of the SSMP, scheduled to be completed by September 30, 2005, and will be regularly updated to reflect changing conditions and spill characteristics.

III. NOTIFICATION PROCEDURES, CALL ROUTING AND DISPATCH

This section establishes the procedure for the City of Newport Beach to communicate internally and externally, mobilize, respond to and correct or repair any condition, which may cause or contribute to an unpermitted discharge of sewage. There is a response to each reported spill caused by public or private facilities, which occurs on public or private property. This plan considers a wide range of potential system failures that could create an overflow to surface waters, onto land, into groundwater, or into buildings.

A. Receipt of Information Regarding a Sewer Overflow

An overflow may be detected by Newport Beach employees or by others (i.e. business owners, residents, etc.) by calling 949-644-3011. The Utilities Department Administrative staff are primarily responsible for receiving phone calls regarding possible sewer overflows during regular business hours and are responsible for notifying the appropriate work crew to respond to any given field situation. After hours, all calls go through the City of Newport Beach Police Department Dispatch Center (949-644-3717) and the duty responder is contacted directly by the Police Department. The “duty responder” then notifies any additional City personnel once the situation has been assessed. The Wastewater Supervisor is then responsible as a primary responder to notify the regulatory agencies and compiles reports on the spill. The details of these procedures are summarized in the procedure below.

- Notification is received at the City, typically via a phone call from either from a private citizen, business owner, or City staff;
- All frontline City personnel working during regular business hours forward sewer related calls to the Utilities Department;
- After hours, all calls go through the Police Department non-emergency line, where the PD notifies the duty responder.

In order to ensure “frontline” personnel are fully informed of the proper information to gather and report, the Utilities Department conducts training meetings of all frontline personnel annually to discuss current procedures and develop any new steps that may streamline or enhance the existing program.

B. Dispatch of Appropriate Crews to Site of Sanitary Sewer Overflow

Failure of any element within the wastewater collection system that threatens to cause or causes an SSO will trigger an immediate response to isolate and correct the problem. Crews and equipment are available on-call on a 24-hour basis to respond to any SSO location. Personnel are immediately dispatched to any site of a reported SSO immediately. Should assistance be needed, additional maintenance personnel as well as contractors and “Mutual Aid Agencies” are on call 24 hours. *The details of these procedures are described in depth in the “Utilities Employee Handbook,” and are summarized in the procedures below.*

- *Upon arriving on scene the Wastewater Supervisor or duty responder gathers information immediately available and determines if the spill is actually coming from the sewer.*
- *Once determined to be a sewer spill, every spill will be handled in the same manner regardless of it being private or public and without regard of the jurisdictional responsibilities. The following section describes the procedures for handling sewer spills.*

IV. OVERFLOW CONTAINMENT CORRECTION AND CLEAN-UP

SSO's can result from blocked or restricted sewers, pipe failures, pump station failures or by exceeding the capacity of the system, among other natural and man-made causes. City staff is on alert for these situations and the Wastewater Division is prepared 24 hours a day to receive and respond in a timely manner to any report of an SSO.

The objectives of these response procedures are to protect public health and the environment. The detailed procedures to achieve these objectives are summarized below.

- Utilities staff (or, in rare cases, General Services Department staff) immediately contain (using berms, sandbags, or mats at the nearest downgrade storm drain inlet) SSO's to the greatest extent possible with all available equipment and resources.
- Utilities staff determines if the SSO's containment requires additional support or mutual aid and makes such a request where applicable;
- Using cones, perimeter tape, or flares, Utilities staff establishes perimeters of the containment area and posts signs as needed.
- During the containment process or at the earliest opportunity thereafter, the Utilities Wastewater Supervisor or the after-hours duty responder notifies regulatory agencies.
- If the spill is the result of a blockage, break or deficiency in a private sewer line, Utilities staff immediately contacts the responsible party and containment continues until the blockage is cleared or the private party takes active and ongoing responsibility for all containment responsibilities.
- At the first opportunity or following clearing of the blockage or reasonably permanent containment (i.e. bypass, or holding tank), Utilities staff puts clean-up procedures in place (removal and later disposal into the sanitary sewer via a Vactor or small mobile vacuum unit).

V. REPORTING

For each SSO, the Wastewater Supervisor completes a "Five Day Report." We send this report via e-mail to the RWQCB within five business days of the time the City was notified of the spill. We distribute a copy of the 5-Day Report to the Orange County Health Care Agency and to the Operations Manager, the Utilities Director, and the Assistant City Manager for informational purposes. We maintain a copy of each report in the Department's administrative files.

VI. FOLLOW-UP PROCEDURE

Occasionally, Utilities staff must take additional actions following the spill response, clean up, and reporting to prohibit similar spills from occurring. These actions, which fall loosely into long-, medium-, and short-term categories depending upon the time they take for full implementation, can include but are not limited to the following:

- Issuance of Notice of Violation (NOV), Compliance Order (CO), or Cease and Desist Order (CDO) to private property owner (short-term);
- Coordination of enforcement action with other agencies (OCHCA, RWQCB, Orange County Public Facilities and Resources Division) (short term);
- Civil and/or Criminal prosecution (medium-term);
- Televising of Sanitary Sewer Main (short-term);
- Increased cleaning frequency for that specific segment of the Sanitary Sewer Main (long-term)
- Regular Monitoring of the Sanitary Sewer Main (long-term)
- Repair of the Sanitary Sewer Main (medium-term);
- Realignment and/or Reconstruction of Sanitary Sewer Main (long-term); and
- Monitoring and Testing (long-term).

Media notification procedures are also applicable to this section. Currently, City policy authorizes only designated representatives to provide information to members of the media or their representatives. These designated representatives include the City Manager, Assistant City Manager, Public Information Officer and/or the Utilities Director.

VII. UPDATE, DISTRIBUTION AND TRAINING

The Utilities Department shall annually review (as per the minimum frequency required by Section C.(ix)(C) of the Sewer WDR) the SSOERP. More frequent reviews shall be performed as warranted. If an element of this plan or related documents or appendices were revised, we would initiate a review. If the change initiates a revision to the SSOERP (the determination is based on the significance of the impact to the SSOERP), we will revise and distribute the change under the direction of the Operations Manager with the approval of the Utilities Director. Where revisions to companion documents affect the SSOERP, we will make these changes to companion documents within one month.

In addition to the periodic reviews, a standard annual review shall be made to ensure the SSOERP and related documents are current, correct and applicable. Any changes shall be made within one month of this review, which shall occur on the anniversary date of the initial distribution date.

A. Distribution of SSOERP and Companion Documents

Upon completion of the first final SSOERP and with subsequent revisions, the Operations Manager shall distribute hard copies, within a week of the approval of the revised document, to those individuals holding the positions and the files listed below:

- Utilities Director
- Utilities Operations Manager

- Wastewater Supervisor
- Administration File
- Sewer WDR in Wastewater Division Files*
- CMOM File 211.3

Additionally, the SSOERP shall be incorporated into the SSMP and the date of the SSMP shall be revised to reflect the update. This update shall be tracked in the master SSMP file CMOM 211.2.

B. Availability to the Public

Section C 11. requires the City of Newport Beach to make the SSMP, and hence the SSOERP, "available to any member of the public upon request in writing." Therefore any revision of the SSOERP shall be maintained in electronic format on the City's Web site (www.city.newport-beach.ca.us) and the City's water quality Web site (www.CleanWaterNewport.com) as a separate "button" identified as "Management of Newport Beach's Wastewater System". If a reader wants to download the SSOERP, the connection shall be such that the SSOERP can print directly from a stored and active file to ensure that readers see the most current version. The file shall contain an advisement that "*This is a living document and is regularly revised. You are being provided with the current version and particular items, terms, procedures, standards and/or statements may have been different in the past and may be revised or eliminated in the future.*" Upon request of a caller or writer, the Utilities Director shall provide a hard copy of the SSMP and/or the SSOERP.

C. Training

This section describes the frequency, content and positions responsible for fulfilling the training requirements of the SSOERP.

1. Incident Commanders (ICs)

Training on the SSOERP shall be provided to any staff member holding a position, which may fill the role of IC or directly supervises one or more of these staff members. The training shall be conducted by the Wastewater Supervisor or his/her designee. The trainer shall have extensive knowledge of not only the SSOERP but also the City of Newport Beach and its staff, resources, field conditions, policies and procedures as they apply to the sewer system maintenance and emergency response. The topics covered shall include:

- Overview of the Sewer WDR and intent of SSMP
- Overview of the function and need for the SSOERP
- Review of each section of the SSOERP
- Review of related documents and their procedures (Duty Responder SOP, Safety Procedures, etc.)
- Discussion and Focus on any shortfalls of the IC or crews in execution of the required actions and procedures in the SSOERP
- Discussion and documentation of any shortcomings in the SSOERP

Training shall be provided annually with the exception that the initial training be held within one month following the completion of the SSOERP. It shall precede the review and update of the SSMP by one month to provide time to review and incorporate changes based on this input. Training dates, materials, attendees are documented in CMOM file 222.

2. Wastewater Field Crews

Field staff shall also be trained on an annual basis on proper response procedures (Duty Responder SOP and Safety Procedures). Again this training shall precede the review and update of the SSMP by one month to provide time to review and incorporate changes based on staff input. New staff is trained on an individual basis within one month of starting work. The Wastewater Supervisor, under the direction of the Utilities Operations Manager, shall provide this training. Training dates, materials, attendees are documented in CMOM file 222.

The general training for field staff (required by Section C.7. of the Sewer WDR requiring “staff be adequately trained and possess adequate knowledge, skills and abilities as demonstrated through a validated program...”) will be developed as part of the SSMP. This will focus more on the routine maintenance activities and equipment used in exercising daily or typical duties.

VIII. Definitions

Sanitary Sewer Overflow ("SSO") – A sanitary sewer overflow (aka sewer spill, sanitary sewer spill, sanitary sewer overflow) is any overflow, spill, release discharge, or diversion of wastewater from a sanitary sewer system. Sanitary sewer overflows include: (i) overflows or releases of wastewater that reach waters of the United States; (ii) overflows or releases of 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 in a sanitary sewer, other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is

privately owned is a sanitary sewer overflow when sewage leaves private property and enters a public street, gutter, storm drain, or waters of the State.

Sanitary Sewer 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 part of the sanitary sewer system, and discharges of sewage to these facilities are not sanitary sewer overflows.**

Incident Commander ("IC") - The Newport Beach employee at a sewer spill who is of the highest rank within Newport Beach Wastewater Division. This person is responsible for directing the operations, gathering information and insuring the SSOERP and SSOP are adhered to.

Duty Responder – A rotating position within the Utilities Department, which takes responsibility for 24-hour on-call response to emergency situations for the Department. This person provides all pertinent information to the Wastewater Supervisor as he/she responds to calls.

* Required by Section C Permit Availability of the Sewer WDR.

** Despite trenches being included in this list of temporary storage areas, if the sewage is allowed to seep out of the trench and reaches the water table (groundwater), it is considered a spill.