

Connection Summer Meeting 2022
CWEA

SSS WDRs Training for Legally Responsible Officials (LROs), Data Submitters, Supervisors and Managers

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REGULATORY BEST PRACTICES

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Draft WDR Presentation & Comments >>>

FISCHER COMPLIANCE

Services

- Sewer System Management Plan (SSMP) Audits
- Sewer System Management Plan (SSMP) updates
- Compliance Evaluation Inspections utilizing USEPA recommended standards with a credentialed inspector.

About the Instructors:

Water Board WDRs Enforcement/Inspector (retired)	Operations Superintendent, LRO (retired)	Agency Manager, LRO (retired)

New WDRs LRO Workshops

Additional Technical Services

- Benchmarking Reports
- Onsite Trainings
- Lift/Pump Station/Force Main Compliance Inspections and Emergency Response Plans

FischerCompliance.com jim@fischercompliance.com (916) 606-5275 3230 Arena Blvd, STE 245 Sac, CA 95834

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1. About

2. Learning Objectives

3. Sample Content

James Fischer
Fischer Compliance LLC:
Retired State Water Board
NPDES Inspector

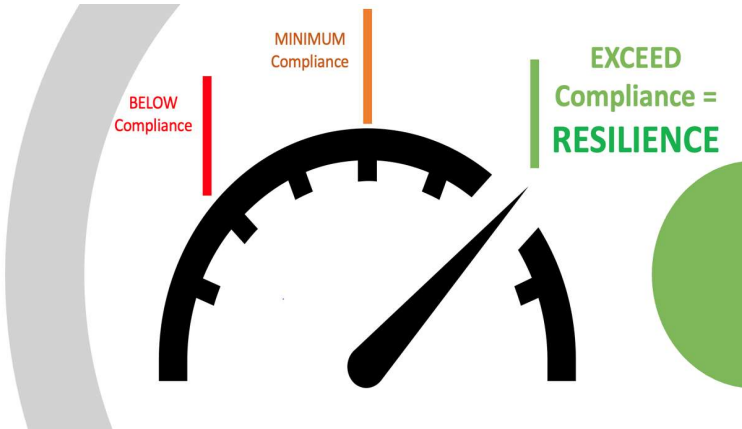
Rich Cunningham
Cunningham Consulting:
Retired Manager

Sam Rose
Sam Rose Consulting:
Retired Superintendent

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1. About



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1. About

>100 Years Experience

- Regulatory Compliance and Enforcement Insights
- System Operations and Management
- Industry Best Practices




James Fischer
Fischer Compliance LLC:
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NPDES Inspector



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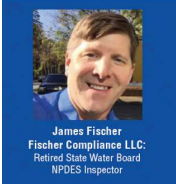
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1. About


Instructors

- Jim Fischer (Fischer Compliance LLC)**
 - Course Manager
 - SSMP Audits/Effectiveness
 - Water Board Inspections/Insights
 - Regulatory Best Practice Leader

James Fischer
Fischer Compliance LLC:
Retired State Water Board
NPDES Inspector

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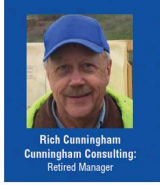


Jim Fischer (Fischer Compliance LLC)

- Course Manager
- SSMP Audits/Effectiveness
- Water Board Inspections/Insights
- Regulatory Best Practice Leader

Rich Cunningham (Cunningham Consulting)


- Historical Knowledge/Experience
- Compliance Perspective
- Management Leadership/Recommendations



Rich Cunningham
Cunningham Consulting;
Retired Manager

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1. About

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Jim Fischer (Fischer Compliance LLC)

- Course Manager
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- Water Board Inspections/Insights
- Regulatory Best Practice Leader

Rich Cunningham (Cunningham Consulting)

- Historical Knowledge/Experience
- Compliance Perspective
- Management Leadership/Recommendations

Sam Rose (Sam Rose Consulting)

- Historical Knowledge/Experience
- Compliance Perspective
- Management Leadership/Recommendations
- Subject Matter Expertise (SSMP, MRP, CIWQS, Documentation)



Sam Rose
Sam Rose Consulting;
Retired Superintendent

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2. Learning Objectives



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1. Expedite SSMP/Audit compliance.
2. Avoid Common Violations
3. Reduce Enforcement/Fines
4. Gear-up for Anticipated New WDRs.
5. Resilience/hold-up to scrutiny.

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2. Learning Objectives



5. Reducing Future Violations

6. Improving Implementation

7. Improving Effectiveness

8. Resilience Measures




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2. Learning Objectives



1. Basics

- a. Refine existing skills, improve confidence and arm with additional strategies for managing your system "like your mission statement says".
- b. Learn what compliance looks like for all requirements in Order.
- c. Gain valuable Regional Board insights for helping avoid violations, enforcement and negative public attention.
- d. Improve relationships with governing board, rate payers, and staff.
- e. Obtain certificate of completion for course to validate competence.



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2. Learning Objectives



2. State/Regional Board-specific
 - a. Know your region-specific spills data/trends
 - b. Know your region-specific priorities and initiatives
 - c. Know your region-specific RB historic enforcement actions for spills
 - d. Avoiding RB inspection peeves, common permit violations

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2. Learning Objectives



3. LRO/manager specific
 - a. How to be a competent Legally Responsible Official (LRO), supervisor and manager for properly managing your SSMP.
 - b. Exceed new Sewer System Management Plan (SSMP) requirements.
 - c. Best practices for avoiding common permit violations, reducing agency risks for enforcement and fines
 - d. Learning regulator auditing techniques.
 - e. Knowing basics about SSMP and notification/reporting timelines for avoiding violations
 - f. Advanced LRO training (optional at end of class)

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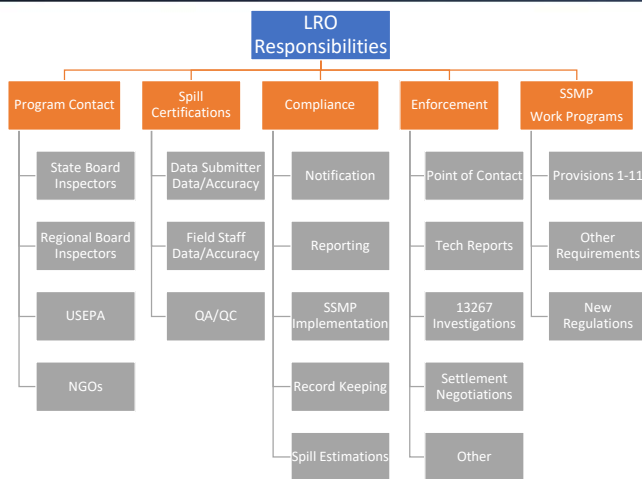


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MOD 1: Introduction

MOD 2: Regulatory Overview

MOD 3: SSMP, MRP, SSO Events

MOD 4: SSMP Audits

MOD 5: SSMP Implementation

MOD 6: Training


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0830-0945	1000-1115	1130-1200	1230-1430	1445-1530
MOD 1	MOD 2	MOD 3	MOD 4-6	Final Quiz












BREAK
BREAK
LUNCH
BREAK
COURSE END

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KEY TOPICS

1. SSS WDRs Background

2. SSMP

3. MRP

4. CIWQS


5. SSMP Implementation

6. Documentation

7. Estimations

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What Compliance Looks Like



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- High-Level Review of WDRs
 - US EPA and the Clean Water Act (1972)
 - Capacity, Management, Operations, Maintenance: CMOM (1994)
 - 1st California Waste Discharge Requirements: WDR's (2006)
 - 2nd WDRs - Revisions (2013)
 - 3rd WDRs - Revisions (2022)

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What Compliance Looks Like



- **How to Comply: Overview**
 - Major increase in size and complexity of WDR
 - Cooperative negotiations with State Board staff
 - Operations and maintenance staff input on SSMP's
 - Exfiltration impacts
 - Category 4 spills
 - Waters of the US or waters of the State?



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What Compliance Looks Like





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graph TD
    S1[STEP 1: Review agenda for day] --> S2[STEP 2: Review Water Board compliance/enforcement for region]
    S2 --> S3[STEP 3: Review safety concerns/areas of construction]
    S3 --> S4[STEP 4: Review sewer maps, critical spare parts (SSMP Att 11)]
    S4 --> S5[STEP 5: Review staffing/training]
    S5 --> S6[STEP 6: Review previous SSMP Audit findings/responses]
    S6 --> S7[STEP 7: Review roles, responsibilities, and project selection for CIP]
    S7 --> S8[STEP 8: Review of SSO reports audited]
    S8 --> S9[STEP 9: Identify areas for field inspections/crew interviews]
    S9 --> S10[STEP 10: Field Inspections/Interviews]
    S10 --> S11[STEP 11: Conduct Post-Inspection debrief]
    
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LOCATION 4: Menlo Park Industrial Park Pump Station): The pump station/force main was originally constructed in the late 1960's. Recent maintenance performed for pumps, motor control center (MCC)/controls, and backup generator [need include more details here what has been done since original installation]. Station includes two submersible pumps [need makes/models/sizes] and a force main discharge pipe of approximately 400 feet long discharging to a manhole located northeast of the station north of Willow Road. The District is working with developers to move the existing location of this lift station within the few next years which will provide new assets and upgraded equipment. To further assess the District SSMP effectiveness, compliance, and level of implementation, the following key items, photos and observations were documented.

Item Reviewed	SSS WDRs Citation(s)	Observations/Comments
<ul style="list-style-type: none"> Key assets inspected 	<ul style="list-style-type: none"> Provisions D.8, D.11, D.13 	<ul style="list-style-type: none"> Wet well (no significant buildup observed). Pump/motor controls, logbook. Force main valve controls (leaky valve observed).
<ul style="list-style-type: none"> Alarms 	<ul style="list-style-type: none"> Provisions D.8, D.11, D.13 	<ul style="list-style-type: none"> Active alarm/level monitoring in place. High float alarm fully functional after simulated "high level" initiated by operations staff. Automatic transfer switch (ATF) fully functional after simulated power failure initiated by operations staff.
<ul style="list-style-type: none"> Backup power/generator 	<ul style="list-style-type: none"> Provisions D.8, D.11, D.13 	<ul style="list-style-type: none"> Fuel level verified at "full" capacity. Alarm notification for simulated failure(s) received approximately 5 minutes after simulated failures initiated by operations staff.
<ul style="list-style-type: none"> Operator Training 	<ul style="list-style-type: none"> Provisions D.8, D.11, D.13 	<ul style="list-style-type: none"> Operators stated they are not periodically trained on bypassing operations at this station.

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APPENDIX 1
COMPLIANCE EVALUATION INSPECTION (CEI) REPORT

FACILITY INSPECTED: West Bay Sanitary District	INSPECTED BY: James Fischer, P.E. NPDES Compliance Inspector ¹ Principal, FISCHER COMPLIANCE, LLC <i>James Fischer</i> Date: 5/17/2022
REVIEWED BY: Sam Rose Principal, SAM ROSE CONSULTING	
SANITARY SEWER COLLECTION SYSTEM (WASTEWATER) Waste Discharge ID (WDID) #XXXXXX	
Water Quality Order(s) 2006-003-DWQ/2013-0058-EXEC	
CWQS Place ID 631678	
Regional Water Quality Control Board 2	
County San Mateo	
Population/Area 55,000	
Miles of Sewers (gravity) 200.23	
Miles of Sewers (force mains) 10.6	
Sewer Connections (#) 19,141	
Lift Stations (#) 12	
Final wastewater disposal Silicon Valley Clean Water (WDID 2SSO10190)	




Photo 9: Safety gas monitoring checked by operations staff prior to opening wet well holding no hazardous gas levels were observed by meter prior to inspection.




Photo 10: District staff inspecting wet well of station.




Photo 11: View inside wet well of station; no significant buildup of grease, grit, or major corrosion observed.





Photo 12: Inspection with operations staff on station operations, maintenance, bypassing, wet well holding items, and other details.

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Agency: REGION: Date:

Count of SPILL TYPE: 275 SPILL VOL: 97006 Count of SPILL VOL REACH SURF: 251 SPILL VOL REACH SURF: 59842 SPILL VOL REACH LAND: 4669

Spill Volume:

Count of CAT by Year and CAT

Count of CAT by Year and CAT


Agency: SSO Rate Per 100 Miles by Year

Region: SSO Rate Per 100 Miles by Year

State: SSO Rate Per 100 Miles by Year

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Agency: REGION: Date:

Count of SPILL TYPE: SPILL VOL: Count of SPILL VOL REACH SURF: SPILL VOL REACH SURF: SPILL VOL REACH LAND:

Spill Volume:

Count of CAT by Year and CAT

Count of CAT by Year and CAT

Agency: SSO Rate Per 100 Miles by Year

Region: SSO Rate Per 100 Miles by Year

State: SSO Rate Per 100 Miles by Year

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Enforcement News

Desert Water Agency agrees to pay \$181,947 penalty for sewage collection system spill

Colorado River Basin Regional Board approves settlement

April 12, 2022 Contact: [Ailene Volsin](#) – Public Information Officer

PALM DESERT – Desert Water Agency, a public utility that owns and operates a wastewater collection system serving Cathedral City, agreed to pay a \$181,947 penalty for discharging approximately 268,916 gallons of raw sewage into the Whitewater River Channel.

The incident occurred between Feb. 15-19 after a main pipe ruptured during a heavy storm, sending the untreated wastewater into the channel in Cathedral City. The agency successfully diverted the sewage when it became aware of the spill and later replaced the sewer line.

In the settlement approved today by the Colorado River Basin Regional Water Quality Control Board, half of the penalty will be deposited in the State Water Resources Control Board's Cleanup and Abatement Account. The remaining funds will be used to purchase and install the Cathedral Canyon Lift Station Flow Meter Monitoring Vault and Sample Box to detect flow variations that indicate pipe breakages and take water samples to identify pollution in the river channel and local groundwater.

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Water Quality Violations	Date
Settlement reached with sewer district that had hundreds of raw sewage spills	12/29/2021
Los Angeles Water Board reaches settlements with four companies for waste discharge violations \$411,282 will be deposited in state's cleanup account	12/22/2021
Global real estate company agrees to pay \$565,304 for unpermitted discharge Exeter reaches settlement with Santa Ana Water Board	09/29/2021
Imperial Irrigation District settlement leads to water quality upgrade for disadvantaged households \$549,000 fine will be used to provide Point of Entry water treatment	09/20/2021
Monterey One Water to pay \$800,000 for discharges of untreated wastewater into Monterey Bay	08/17/2021
Settlement reached but monitoring continues of crude oil release in Ventura County watershed \$330,218 in fines will be deposited in the Waste Discharge Permit Fund	06/30/2021
San Diego Water Board orders federal treatment plant to stop discharge permit violations Agency also directed to make repairs at wastewater border facility	06/29/2021
PG&E settlement for once-through-cooling discharges at Diablo Canyon nuclear plant	06/22/2021
Court decision upholds \$2.8 million fine, clears path for long-awaited restoration of Point Buckler Island Unauthorized levee construction considered brazen and harmful	06/17/2021
Laguna Beach reaches \$1.5 million settlement for wastewater collection system failure	06/09/2021
Pistachio processing facility in Tulare County will pay \$221,440 fine for odor violations	06/07/2021
\$2.5 million settlement reached for Mule Creek State Prison violations of Clean Water Act	03/29/2021
City of Colfax agrees to settlement for Bunch Creek sewage spill	03/26/2021
Sumiden Wire Co. agrees to settlement in industrial wastewater discharge case	03/11/2021

What Compliance Looks Like

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2. Sample Content

What Compliance Looks Like



Violation – Discharge of Untreated Sewage to Surface Waters

The City of Galt (City or Discharger) is regulated by the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order 2006-0003-EXEC, as modified by Order No. 2013-0058-EXEC (SSS WDRs). This permit prohibits the discharge of untreated wastewater to water of the United States. On 28 and 29 November 2018, an estimated 301,000 gallons of untreated wastewater spilled from the sanitary sewer system into Dead Man Gulch Creek, tributary to South Laguna Creek. For purposes of settlement, Board staff has not included penalties for the 12 discharges of raw sewage to land between 25 May 2013 and 28 November 2018. However, if this matter goes to hearing, these additional sewage spills will be considered. In addition, the penalty factors as assigned below will be reevaluated which may result in a higher liability.

Adjustments for Discharger Conduct

PENALTY FACTOR	VALUE	DISCUSSION
The Degree of Toxicity of the Discharge	3	Untreated sewage contains elevated concentrations of ammonia, nitrate, coliform organisms and other substances which are known to cause adverse impacts to aquatic life, and to human health. Because the discharged material possessed "an above moderate risk or a direct threat to potential receptors", a score of 3 was assigned for this factor.
Actual Harm or Potential Harm to Beneficial Uses	2	The untreated sewage entered Dead Man Gulch Creek, tributary to South Laguna Creek, during a storm event. The beneficial uses of the Laguna Creek and its tributaries that could be impacted by the untreated sewage include municipal and domestic water supply, agricultural irrigation and stock watering, contact and non-contact water recreation, warm freshwater habitat, cold freshwater habitat, and wildlife habitat. The untreated sewage contains pathogens, nitrogen, ammonia, and biological oxygen demand. Elevated levels of these constituents can lead to low dissolved oxygen in the receiving water, impacts to aquatic life, and impacts to human health. The discharge was expected to have a below

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Susceptibility to cleanup or abatement	1	None of the spill was recovered because the spill entered surface water.
Per gallon and per day factor for discharge violations	0.15	The "Deviation from Requirement" is moderate because the SSS WD prohibit any discharge of sanitary sewage overflows from entering water of the United States. The Prosecution Team has determined that the Discharger's intent was to have backup power available and it was the failure of the equipment that caused the spill. The discharge, therefore, is a moderate deviation from the requirements of the SSS WDRs.
Volume discharged minus 1,000 gallons per event	300,000 gallons	According to the Discharger, 301,000 gallons was discharged to surface water and not recovered. The total volume, minus 1,000 gallons per event, is used in the calculation.
Adjustment for high volume discharges	Yes, \$2/gallon	For large volume spills, the Enforcement Policy allows a reduction from the statutory maximum of \$10/gallon and suggests \$2/gallon for sewage spills. The Prosecution Team has determined that \$2/gallon is appropriate in this matter.
Per gallon penalty	\$90,000	The liability is calculated as per day factor multiplied by the number of gallons multiplied by \$2/gallon.
Days of discharge	1 day	Untreated sewage was discharged to Dead Man Gulch Creek between 23:45 on 28 November 2018 and 00:15 on 29 November 2018.
Per day penalty	\$3,000	The liability is calculated as per day factor multiplied by the number of days multiplied by the statutory maximum per day (\$10,900).
Initial Liability for Violation	\$91,500	Sum of the per-gallon and per-day penalties.
Culpability	1.1	The spill occurred during evening hours due to a storm related power failure and the dialer modem failed to auto dial the standby utilities operator. The power failure caused all four of the lift station's sewage pumps to become unavailable. The spill was not discovered until the following morning. The Discharger updated its Sanitary Sewer Management Plan (SSMP) in February 2016, after the Live Oak Lift Station and for main were improved and brought online. Since February 2016, including during the discharge event, the Discharger properly implemented its SSMP. Prior to the incident, the Discharger installed an emergency generator to ensure the lift station has auxiliary power in case of a power outage. Additionally, a mounted crane and concrete pad were installed to facilitate better maintenance. After the incident, the Discharger swiftly implemented steps to ensure that a similar incident does not occur in the future. The Discharger purchased and installed a smartcover system upstream of Live Oak Lift Station, which allows the Discharger to continuously measure, acquire, and communicate data via satellite for better maintenance and response to Sanitary Sewer Overflows at the lift station. This allows the Discharger to communicate and receive notifications about the lift station's status during a power outage or communication blackout with the Supervisory Control and Data Acquisition (SCADA) system. In addition, the Discharger is planning to install

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Q/As

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Cunningham Consulting:
Retired Manager

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Best Practice Recommendations

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Best Practice Recommendations





- Eyeball Estimate Method
- Measured Volume Method
- Duration and Flow Rate Method (Account for diurnal flow pattern for long duration)
- SSO Flow Rate Estimating Tool
- Other (explain) i.e., estimated daily use per capita upstream or meter @ Pump Station.

USED 5.6 GPM OR LESS BASED ON FLOW RATE FROM SURCHARGED MANHOLE FLOW RATE PHOTOS

Spill Volume Under Reported?

Agency was not able to produce photo of spilling manhole

Was this spill under reported?

135 minutes x 2.5 GPM = 338 Gallons

135 minutes x 5.0 GPM = 675 Gallons

Duration and Flow Rate Method worksheet:

Start Date and Time	1. 8:30 AM
End Date and time	2. 10:45 AM
Total time elapsed of SSO event (subtract line 1 from line 2. Show time in minutes)	3. 2 HR, 15 MIN.
Average flow rate GPM (account for diurnal pattern)	4. 1.6 GPM. ←
Total volume estimate using duration and flow rate method (Line 3 x Line 4)	5. 135 GAL.

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Best Practice Recommendations





- a) Estimated spill volume that reached a separate storm drain that flows to a surface water body? 0 ←
- b) Estimated spill volume recovered from the separate storm drain that flows to a surface water body? (Do not include water used for clean-up) 0 ←
- c) Estimated spill volume that reached a drainage channel that flows to a surface water body? 0
- d) Estimated spill volume recovered from a drainage channel that flows to a surface water body? 0
- e) Estimated spill volume discharged directly to a surface water body? 0
- f) Estimated spill volume recovered from surface water body? 0
- g) Estimated spill volume discharged to land? (Includes discharges directly to land, and discharges to a storm drain system or drainage channel that flows to a storm water infiltration/retention structure, field, or other non-surface water location.) 878
- h) Estimated spill volume recovered from the discharge to land? (Do not include water used for clean-up) 878


Estimated Total spill volume Reach Surface Water (a-b+c+e)	Estimated Total spill volume Reach Land (g)	Estimated Total spill volume Recovered (b+d+f+h)	Estimated Total spill volume (a+c+e+g)
0	878	878	878

Agency Not Able to Produce a Photo demonstrating Sewage was captured in Storm Drain

SSO Field Notes:

“...Less than 10 gallons of overflow entered the drain inlet before crews could set down the rubber mats and sandbags. However, the overflow was fully contained inside of the catch basin and crews were able to recover all of the wastewater from the catch basin as a District combination truck arrived on scene and began to vacuum up the overflow.”

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Best Practice Recommendations







Improper CIWQS Reporting

Photo Evidence shows sewage has not passed




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Best Practice Recommendations





17 - Estimated spill start date/time: 2018-12-16 08:30:00.0

18 - Date and time sanitary sewer system agency was notified of or discovered spill: 2018-12-16 08:30:00.0

19 - Estimated Operator arrival date/time: 2018-12-16 08:55:00.0

20 - Estimated spill end date/time: 2018-12-16 10:45:00.0

SPILL START TIME NOTES

Caller interview: Where did you see sewage spill from? From: Manhole Inside Building C/O

Wet well/Lift station Other _____

Time Caller noticed spill: 8:30 AM PM Date: 12 / 16 / 18

Comments: CALLER NOTICED STRONG ODOR CALLED IN FOR ODOR COMPLAINT.



Last time Caller observed NO Spill occurring: _____ AM PM Date: _____ / _____ / _____

Other Comments regarding spill start time: NEIGHBOR HAD CALLED IN TO NOTIFY OF STRONG ODOR, OUR START TIME IS BASED ON EMERGENCY CALL.

Agency Used Spill Rate + Duration Spill Volume Estimation Method.

Can they justify their Start Time?

...likely underreported spill volume

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Best Practice Recommendations



Estimating Spill Start Time

estimate
[estimate] 🔊

VERB

- roughly calculate or judge the value, number, quantity, or extent of.
"the aim is to estimate the effects of macroeconomic policy on the economy" -
[more]
synonyms: roughly calculate · approximate · make an estimate of · guess · [more]

NOUN

- an approximate calculation or judgment of the value, number, quantity, or extent of something.
"at a rough estimate, our staff is recycling a quarter of the paper used"
synonyms: rough calculation · approximation · estimation · [more]

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Estimating Spill Start Time

basis
[ˈbæɪsɪs] 🔊

NOUN

- the underlying support or foundation for an idea, argument, or process.
"trust is the only basis for a good working relationship"
synonyms: origin · cause · root · source · starting point · core · center · heart · kernel · base · foundation · reality · essence · nitty-gritty · substance · essentials
- the justification for or reasoning behind something.
"on the basis of these statistics important decisions are made"
synonyms: foundation · support · base · footing · reasoning · rationale · defense · reason · grounds · justification · rationalization · motive · motivation · cause

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What's the BASIS for your ESTIMATE? Is It Reasonable?

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NGO Allegation

“While some areas where spills have occurred were dry at the time, the discharged pollutants remain on the surface of the land and enter receiving waters following rainfall or flooding.”

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Best Practice Recommendations



- **Best Practice: SSO Clean Up**
- **Hard Surfaces** (Concrete and asphalt)
 - Contain/divert to keep the wetted footprint as small as possible.
 - Poned Sewage - Measure volume and then Vacuum-retrieve sewage prior to washdown.
 - Broom and Flush/Wash surface fresh water.
 - Measure and document volume of washdown water used.
 - Dilution factor should be as high as possible without causing damage to surroundings.
 - Direct all washdown water to the vacuum and retrieve.
 - Return all washdown water and sewage to the collection system.
 - Document cleanup efforts
 - Photo documentation provides evidence of efforts made.

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Best Practice Recommendations



- **Best Practice: SSO Clean Up**
- **1. Unpaved Surfaces:** (dirt, field, or landscaped surfaces)
 - a. Contain/divert to keep the wetted footprint as small as possible.
 - b. Measure volume and then Vacuum-retrieve all ponded sewage prior to washdown.
 - i. Useful to adapt a flex hose (4") to vacuum tubes on hydro-vac to extend reach.
 - c. Spray/Dilute affected area with fresh water, directing water to vacuum for retrieval.
 - i. Dilution factor should be as high as possible without causing damage to surroundings.
 - d. Return all washdown water and sewage to the collection system.
 - e. Document cleanup efforts.
 - i. Photo documentation provides evidence of efforts made.

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Best Practice Recommendations



Proper CIWQS Reporting

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Q/As

Rich Cunningham
Cunningham Consulting:
Retired Manager


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Best Practice Recommendations



Major Compliance Points	2006 WDRs (#)	2022 Draft WDRs (#)
• Definitions	7	33
• Findings	11	19
• Prohibitions	2	3
• Specifications	(see Provisions)	21
• Provisions	15	12
• MRP	dozens	dozens
• SSMP elements	11	16
• Attachments	0	6



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Best Practice Recommendations



REDUCING ENFORCEMENT EXPOSURE

for SSOs, SSMPs and SSMP Audits

About the Instructors:



Water Board WDRs
Enforcement/Inspector
(retired)



Operations
Superintendent, LRO
(retired)



Agency Manager, LRO
(retired)



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Best Practice Recommendations



Major Requirements	2006 WDRs (23 pages)	2022 Draft WDRs (85 pages)
• Findings	X	X
• Prohibitions	X	X
• Specifications		X
• Provisions	X	X
• MRP	X	X
• SSMP elements (with flexibility)	X	X
• Attachments		X
• LRO Licensing (operator cert.)		X
• Enforcement (Water Code 13267/13383)		X
• SSMP (detailed/prescriptive requirements/CIWQS/public link)		X
• Audits (detailed/prescriptive requirements/CIWQS/public link)		X
• Risk assessment		X
• Resilience planning		X
• Sewer rate/funding/budget detailed narrative including commitments		X
• Resource allocation/details		X
• Legal authority (expanded) including easements, storm drain access, lateral defined ownership and maintenance if applicable		X
• Category 4 spills/reduced reporting option (< 50 gallons)		X
• Condition assessment (detailed requirements)		X
• Sewer system boundary (GIS shape file)		X
• Monitoring (large SSOs, 50,000 gallons or greater to waters of state)		X
• Use of current industry practices (equipment, tech, strategies)		X

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Sanitary Sewer Systems
New Waste Discharge Requirements
for LRO's, Supervisors, and Managers

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8/18/2022
(830-1530)



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About the Instructors:

 <p>James Fischer Fischer Compliance LLC: Retired State Water Board NPDES Inspector</p>	 <p>Sam Rose Sam Rose Consulting: Retired Superintendent</p>	 <p>Rich Cunningham Cunningham Consulting: Retired Manager</p>
<p>(916) 606-5275 jim@fischercompliance.com</p>	<p>(916) 606-5275 jim@fischercompliance.com</p>	<p>(925) 297-9229 rc@sewers.com</p>

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