

WESTERN MUNICIPAL WATER DISTRICT  
**SEWER SYSTEM MANAGEMENT PLAN**



**2014**

WESTERN MUNICIPAL WATER DISTRICT  
SEWER SYSTEM MANAGEMENT PLAN  
(SSMP)  
2014

PREPARED UNDER THE DIRECTION OF  
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GREG SNYDER, WASTEWATER COLLECTIONS SUPERVISOR  
AND SSMP PROJECT MANAGER

In compliance with State Order 2006-0003, Section D.12  
an appropriately qualified professional has prepared the SSMP.

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License Renewal Date: March 31, 2016  
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as new data becomes available

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## **EXECUTIVE SUMMARY**

### WESTERN MUNICIPAL WATER DISTRICT SEWER SYSTEM MANAGEMENT PLAN

Western's Board of Directors adopted its original Sewer System Management Plans with Resolutions 2629 and 2630, July 1, 2009; one for Western's main system tributary to the Western Water Recycling Facility near March Air Reserve Base and a second for its Murrieta system tributary to treatment plants operated by neighboring providers. The SSMPs were combined into one updated SSMP in 2013 incorporating recommendations from the 2011 Audit. The updated SSMP was filed with the State and audited in 2013.

Included in the State Order is a requirement that all agencies audit their SSMPs every two years to evaluate the effectiveness of the plan and staff member's compliance with the State Order. Western has complied with that requirement by having its SSMP audited in 2011 and 2013. The next audit will be due in 2015.

Recommendations from the 2011 audit were incorporated into the 2013 updated SSMP and recommendations from the 2013 audit were incorporated into this 2014 updated SSMP. The SSMP has been formatted to be used as a training text with all pertinent training information in the body of the report and supporting literature in the appendices.

This 2014 SSMP represents the latest updated SSMP and has been prepared for (1) review and approval by the Board of Directors at a public meeting; (2) recertification by Jeffrey D. Sims, Assistant General Manager and Chief Operating Officer, and (3) submittal to the California State Water Resources Control Board for its records, all in accordance with State Order 2006-0003.

## **CERTIFICATION**

*I certify that Western's 2014 Sewer System Management Plan including the SSMP Report, its attachments and appendices comply with the requirements set forth in the General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003 DWQ. I further certify that the documents were prepared under Western's direction and supervision to assure that qualified personnel provided input, evaluated the contents, and subsequently incorporated the information in this 2014 SSMP into the daily operation and maintenance of Western's Sanitary Sewer Systems; that the information included in this 2014 SSMP is, to the best of my knowledge, true, accurate, and complete, and that the 2014 SSMP has been duly presented to and approved by Western's Board of Directors at a public meeting.*

*Signed this 29 day of October, 2014 by Jeffrey D. Sims, Assistant General Manager and Chief Operating Officer, Western Municipal Water District of Riverside County, CA.*



## STATE ORDER

The California State Water Resources Control Board adopted Order No. 2006-0003 May 2, 2006 (State Order) to create an equitable statewide mechanism to manage all publicly owned wastewater collection agencies with more than a mile of pipeline, to reduce the number and severity of Sanitary Sewer Overflows (SSOs), and to set up a central depository for online reporting of SSOs when they do occur.

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

A principal element of the State Order is the requirement that Western adopt and maintain a management plan for its sewer collection and conveyance systems, referred to as a Sewer System Management Plan or SSMP.

Western's Board of Directors adopted two SSMPs July 1, 2009, the Western main system SSMP by Resolution 2629, and Western Murrieta Division SSMP by Resolution 2630; however, according to the State Order Western may have one SSMP for all systems owned by Western. Separate SSMPs are required only if the systems are managed by separate governing bodies. Therefore, Western's all inclusive SSMP satisfies both the State Order and Western's goal for efficacy.

The State Order establishes the following goal:

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

The State Order requires Western staff members perform periodic internal audits of the SSMP with focus on evaluating the effectiveness of the SSMP and staff member's compliance with its requirements, as shown in Section D-13 of the State Order. The internal audits must be performed at least every two (2) years with the audit report kept on file at Western. Audits were completed in 2011 and 2013 and therefore the next audit will be due 2015.

The SSMP must be updated every five (5) years, must contain any significant program changes, and be recertified after review and approval by the Board of Directors. To complete the recertification process, Western staff members must enter the information into the Online SSO Database and mail a hard copy to the State Water Resources Control Board.

## **WESTERN'S SEWER SYSTEMS**

In accordance with the State Order Western's SSMP applies to all sewer systems governed by Western's Board of Directors. Noteworthy is that the State Order applies to pipelines and lift stations and not treatment plants. Treatment facilities are regulated with NPDES permits. Systems managed and/or operated by Western but not governed by Western's Board of Directors including the Western Riverside County Regional Wastewater Authority (WRCRWA) system and the Santa Ana Watershed Project Authority (SAWPA) Inland Empire Brine Line (IEBL) must have a SSMP for each system, approved by each respective governing Board.

Although this SSMP applies to all Western wastewater pipeline and lift station systems whether or not listed herein, the major systems currently governed by Western's Board of Directors include by way of example the following:

- Western's systems tributary to the Western Water Recycling Facility near March Air Reserve Base; for example, Woodcrest south of Van Buren Boulevard, Boulder Springs and Mission Ranch, generally known as Western's East Retail Area.
- Western systems tributary to the WRCRWA treatment facility; for example, Western's El Sobrante, Lake Hills and Victoria Grove areas tributary to WRCRWA, generally known as Western's West Retail Area. And Western's Corona Diversion Structure and Pipeline, constructed to convey wastewater from Corona to WRCRWA.
- Western systems tributary to SAWPA's Inland Empire Brine Line (IEBL) system; for example, Western laterals tributary to the IEBL system, the most notable being the CRC Lateral that conveys wastewater from the California Rehabilitation Center and Naval Surface Warfare Center in the City of Norco to IEBL Reach IVB.
- Western pipelines in and around the Inland Port at March Field tributary to the Eastern Municipal Water District system.
- Western pipelines within its Murrieta Division near the southern boundary of its 527 square-mile jurisdiction. Portions of the service area are tributary to a treatment plant owned and operated by the Rancho California Water District and portions are tributary to a treatment plant owned and operated by the Eastern Municipal Water District.

## SSMP FORMAT

The State's requirements for the SSMP are extremely complex with many overlapping topics. There are eleven major categories in the SSMP and over three-dozen subcategories.

This SSMP has been formatted to meld seamlessly with the State Order such that Section 1 of this SSMP is in response to the first State Order Requirement Section 13.D.i; Section 2 herein matches Section 13.D.ii, and so on.

State Order Main Topic	State Order Section	SSMP Section
Goals	13.D.i	1
Organization	13.D.ii	2
Legal Authority	13.D.iii	3
O&M Program	13.D.iv	4
Design & Performance Provisions	13.D.v	5
Overflow Emergency Response Plan	13.D.vi	6
FOG Plan (fats, oils & greases)	13.D.vii	7
System Evaluation and Capacity Assurance Plan	13.D.viii	8
Monitoring, Measurement and Program Modifications	13.D.ix	9
SSMP Program Audits	13.D.x	10
Communication Program	13.D.xi	11

## SECTION 1: GOALS

### State Order Paragraph D.13.i

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

The purpose of the SSMP is to protect water quality, eliminate or substantially reduce preventable SSOs, and to protect public health and the environment. The SSMP provides a consolidated document that references adequate policies, procedures, guidelines, planning documents, programs, and communication requirements to ensure Western properly funds, manages, operates and maintains all parts of the sanitary sewer system owned by Western. Western will continue to employ adequately trained staff and contractors that possess the necessary knowledge, skills, and abilities to carry out the provisions of this document.

Western's Board of Directors hereby adopts with its approval, certification and ongoing recertification of this SSMP the following goals.

The goals of the SSMP, as stated in the State Order, are as follows:

To provide a plan and schedule to properly and efficiently manage, operate, and maintain Western's sanitary sewer systems, while taking into consideration risk management and cost benefit analysis. Western's SSMP shall contain a spill response plan that establishes standard procedures for immediate response to an SSO in a manner designed to minimize water quality impacts and potential nuisance conditions.

To provide adequate capacity to convey peak flows, to provide notifications and reports to all required regulatory agencies in a timely manner, to minimize the frequencies of SSOs throughout Western's collection system, to effectively mitigate the effects of any SSO that may occur, and to provide public education to increase awareness of FOG issues and how they can impact the collection system.

Western's goal from the Board of Directors' Mission Statement:

To provide water supply, wastewater disposal and water resource management to the public in a safe, reliable, environmentally sensitive and financially responsible manner.

The Management Team's quantitative goals:

- To incorporate SSMP training into routine monthly meetings of the O&M Team. Incorporate SSMP Section 1, into January training each year, Section 2 into February each year, continuing each month with the next SSMP section, thereby completing the eleven sections of the SSMP in eleven of the 12 available months.
- To analyze peak flows using hydraulic system analyses for all Western Systems and to recommend improvements for any deficiencies.
- To complete recommendations from the most recent SSMP Audit as listed in Appendix 1 prior to next required SSMP Audit.

The Operation and Maintenance Team's quantitative goals:

- Provide adequate capacity to convey the peak wastewater flows. Adequate capacity, for the purposes of this SSMP, is defined as the capacity to convey the peak wastewater flows.
- Minimize the frequency of SSOs for both dry and wet weather conditions.
- Mitigate the impacts that are associated with any SSO that may occur.
- Meet all applicable regulatory notification and reporting requirements
- Mitigate the impact of sanitary sewer overflows that do occur.
- Properly manage, operate and maintain all parts of the wastewater collections system

## SECTION 2: ORGANIZATION

### State Order Paragraph D.13.ii

*The SSMP must identify:*

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

*Section J of the State Order: Report Declaration*

*All applications, reports, or information shall be signed and certified as follows:*

- (i) All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.)*
- (ii) An individual is a duly authorized representative only if:*
  - (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and*
  - (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.*

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

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

### **State Order Section 2(a) Responsible or Authorized Representative**

*The SSMP must identify the name of the responsible or authorized representative as described in Section J of this Order.*

John V. Rossi as General Manager of Western, Craig Miller, Deputy General Manager and Jeff Sims, Assistant General Manager and Chief Operating Officer have selected Greg Snyder to be Western's responsible, authorized representative to meet Section J requirements.

"I hereby appoint Greg Snyder as Western's duly authorized representative to sign, certify and file all reports required by the State Order and other relevant information required by the State or Regional Water Board."



*Signed Jeff Sims, Assistant General Manager & Chief Operating Officer*

### **State Order Section 2(a)i Report Signing**

*All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person.*

As written and signed above, Greg Snyder has been named the duly authorized representative of Jeff Sims, Assistant General Manager & Chief Operating Officer, a Principal Executive Officer of Western.

### **State Order Section 2(a)ii Qualifications of the Duly Authorized Representative**

*An individual is a duly authorized representative only if: (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.*

The authorization has been made above in writing, signed by Jeff Sims. The individual named by Jeff Sims has responsibility for the overall operation of the activity known herein as the SSMP. The SSMP pertains to the overall operation of all Western owned sanitary sewer systems.

### **State Order Section 2(b) Names and Phone Numbers**

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

Names and telephone numbers are listed in order of notification.

Greg Snyder, Operations Supervisor for Wastewater Collections and duly authorized representative for all SSMP activities, reporting to the wastewater operations manager.  
Office: 951 789 5131 Cell: 951 956 0411

Stephen Schultz, Deputy Director of Operations, reporting to the director of operations.  
Office: 951 789 5130 Cell: 951 295 2325

Paul Rugge, Director of Operations, reporting to the AGM/COO,  
Office: 951 789 5129

Jeffrey Sims, Assistant General Manager, Chief Operating Officer, reporting to the Deputy General Manager,  
Office: 951 571 5221

Craig Miller, Deputy General Manager, reporting to the General Manager,  
Office: 951 571 7100

John Rossi, General Manager, reporting to the Board of Directors.  
Office: 951 571 7100

**State Order Section 2(b) continued: Lines of Authority**

*The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation.*

See above for names and telephone numbers of management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program

Lines of authority are identified in the organization chart within Appendix 2 and a narrative description for each position follows.

General Manager- Establishes policy and plans Western's work activities. Reports and advises the Board of Directors, of various engineering and work matters, including those related to the District's collection system. Also delegates responsibilities to lower staff through the Deputy General Manager.

Deputy General Manager - Receives general administrative direction from the General Manager. Exercises direct supervision over management, supervisory, professional, technical and clerical staff. Assists the General Manager in the development Plans strategy,

leads staff, allocates resources, delegates responsibilities, and authorizes outside contractors to perform services.

Assistant General Manager and Chief Operating Officer - Receives direction from the Deputy General Manager; Exercises direct supervision over staff in Engineering, Operations and Administrative functions; Assists the Deputy General Manager with resource allocation.

Director of Engineering - Under general policy direction, plans, organizes, directs and implements Western's engineering activities and operations. Prepares wastewater collection system planning documents, manages capital improvement delivery system, documents new and rehabilitated assets and assists in coordinating the development and implementation of the SSMP.

Director of Operations - Under general policy direction, plans organizes, directs and implements comprehensive strategies and programs for the operation of a large potable water distribution and wastewater collection and treatment system. Manages and coordinates all aspects of Western's Operations and assists in coordinating the development and implementation of the SSMP.

Deputy Director of Operations - Under the general direction of the Director of Operations, plans, organizes, directs and administers the operations and maintenance of Western's wastewater and Preventive Maintenance functions. The Wastewater Operations Manger also coordinates the development and implementation of the SSMP.

Operations Supervisor Wastewater Collections - Assists in coordinating the development and implementation of the District's SSMP. Manages field operations and maintenance activities, provides relevant information to agency management, prepares and implements contingency plans, leads emergency responses, investigates and reports SSOs and trains field crews. Supervises the operation, maintenance, and cleaning of lift stations domestic sewer systems and contract wastewater systems.

Operations Supervisor Preventive Maintenance - Assists in coordinating the development and implementation of Western's SSMP. Develop, implements, monitors, and reviews a predictive and preventive maintenance and asset management programs. This position supervises, the operation and maintenance of Western's pumping plants, sewer lift stations, treatment facilities, vehicles and equipment.

Operations Technicians I/II/III/IV Staff - Performs a wide variety of preventive maintenance activities, mobilizes and responds to notification of stoppages and SSOs (mobilize sewer cleaning equipment, by-pass pumping equipment, and portable generators). Assists with sewer line cleaning, inspects, repairs sewer lift stations and performs required maintenance.

Principal Engineer Construction Management - Under general direction from Western's Engineering Manager, plans, organizes, directs and implements assigned engineering activities and operations and assists in coordinating the development and implementation of SSMP.

Construction Contracts Supervisor - Performs professional and technical contract administration and engineering inspection activities for Western's construction projects; assigns, supervises and participates in the work of staff performing inspections of Western's facilities; and assists in coordinating the development and implementation of SSMP.

Construction Inspector - Ensures that new and rehabilitated assets meet Western's standards, works with field crews to handle emergencies when contractors are involved, provides verbal reports to Principal Engineer.

Pretreatment Program Services - A contract services company that manages and assists in administering Western's approved Pretreatment Program; assists Western in complying with Federal, State and local environmental laws and regulations; develops and prepares as needed applicable permits, conducts inspections at industrial user facilities and provides support to all Elements of Western's SSMP.

### **State Order Section 2(c) Chain of Communication for Reporting SSOs**

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

When anyone (member of the general public, law enforcement, regulatory agency, etc.) discovers a possible SSO they can call Western's 24 hour emergency telephone hot line, 951 789 5109 any day of the year and speak to a knowledgeable individual. The emergency number is listed on Western's Web site and in the local telephone directory.

The call will either be handled by Western's administrative staff or rolled over to Western's answering service. In either event, the information along with the caller's phone number will be forwarded immediately to Western's Call Team member assigned for the day.

The Call Team member receiving the information will either drive to the site or request a member of another Call Team to drive to the site depending on fastest response time, to determine if an SSO is eminent or occurring.

If the SSO is affirmed, the Call Team member at the site will mobilize a first responder team to control the SSO and mitigate its effects. The Call Team member will then contact

one or more of the following to obtain additional resources if needed and report status of the SSO.

Alex Chang, Senior Tech for Wastewater Collections  
Office: 951 789 5110 Cell: 951 712 3070

Greg Snyder, Operations Supervisor for Wastewater Collections,  
Office: 951 789 5131 Cell: 951 956 0411

Steve Schultz, Deputy Director of Operations,  
Office: 951 789 5130 Cell: 951 295 2325

If for any reason, Alex Chang, Greg Snyder and Steve Schultz are unavailable the Call Team member will contact Paul Rugge, Director of Operations,  
Office: 951 789 5129.

All wastewater collection O&M Team members are trained in SSO response, control techniques and documentation. All reporting information will be forwarded to Greg Snyder, Western's Authorized Representative named in Section 2(a) above for purposes of reporting SSOs to the State and Regional Water Board and other agencies as applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

## SECTION 3: LEGAL AUTHORITY

### **State Order Paragraph D.13.iii**

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

- (a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);*
- (b) Require that sewers and connections be properly designed and constructed;*
- (c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;*
- (d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and*
- (e) Enforce any violation of its sewer ordinances.*

### **State Order Section 3(a) Legal Authority to Prevent Illicit Discharges**

*Each Enrollee must demonstrate that it possesses the necessary legal authority to prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);*

Western's Board of Directors adopted Ordinance 380, August 15, 2012, hereafter referred to as Western's Wastewater Ordinance or the Wastewater Ordinance. The Wastewater Ordinance supersedes Western's previous Ordinance No. 366. The enforcement section of the Wastewater Ordinance has been reproduced as Western's Enforcement Response Plan (ERP), a stand-alone document that can be handed out for purposes of staff training and public education. The following information (Scope, Applicability and Authority) is as stated in the Wastewater Ordinance.

#### Scope:

The provisions of the Wastewater Ordinance shall apply to any aspect of Western's Sanitary Sewer System, its POTW or any downstream POTW receiving Wastewater from the District's Sanitary Sewer System.

#### Applicability:

The Wastewater Ordinance applies to all Persons, Users, Dischargers, Public Agencies and others who impact the operation of Western's Sanitary Sewer System facilities, its POTWs and/or downstream POTWs owned by other Public Agencies.

**Authority:**

Western is regulated by several agencies of the United States government and State of California pursuant to the provisions of State and Federal Law. The Wastewater Ordinance provides the required legal authority to meet the intent, purposes, and policies set forth herein. Western is granted the authority to adopt the Wastewater Ordinance pursuant to the authorization of Municipal Water District Law of 1911, California Water Code Sections 71000, et seq., California Government Code, Sections 54739-54740, et seq., the California State Water Resources Control Board Order 2006-0003 as may be amended from time to time, the Clean Water Act (33 USC §§ et seq.) and the General Pretreatment Regulations (40 CFR 403).

Western's authority includes, but is not limited to, the right to establish limitations, conditions, and prohibitions; to establish flow rates or prohibit flows discharged to Western's Sanitary Sewer System; to require the development of compliance schedules for the installation of equipment, systems, and materials by all users; and to take all actions necessary to enforce its authority, whether within or outside Western boundaries, including those users that are tributary to Western or within areas which Western has contracted to provide sewerage services.

The Wastewater Ordinance includes several sections that prohibit the discharge of fats, oils, greases and illicit discharges that may cause operational problems.

**Topics include:**

1. Prohibited Waste Discharges
2. Specific Prohibitions
3. Limitations on Discharges
4. Gravity Separation Interceptor Requirements
5. Pretreatment of Industrial Wastewaters

**From Section 3.1.1 of the Wastewater Ordinance:**

No Person shall introduce or cause to be introduced into the District's Sanitary Sewer System or receiving POTW any material (liquid or solid) or any Pollutant, including oxygen demanding pollutants (BOD, etc.) or wastewater which, alone or in conjunction with other substances, causes "Pass Through" or "Interference". These general prohibitions apply to all Persons whether or not they are a User, Discharger, Permittee, or Person subject to categorical Pretreatment Standards or any other National, State, or local Pretreatment Requirements.

**From Section 3.2.1 (A) of the Wastewater Ordinance:**

The Categorical Pretreatment Standards found at 40 CFR Chapter I, Subchapter N, Parts 405-471, as amended, are hereby incorporated into this Ordinance by reference.

On October 15, 2013, Western's Board of Directors entered into the Multijurisdictional Pretreatment Agreement (MPA) with the Santa Ana Watershed Project Authority (SAWPA) and other dischargers to SAWPA's Inland Empire Brine Line (Brine Line), namely the Inland Empire Utilities Agency, San Bernardino Valley Municipal Water District, Eastern Municipal Water District, Jurupa Community Services District, San Bernardino Municipal Water Department and Yucaipa Valley Water District to implement a unified and standardized Pretreatment Program for the Brine Line with identified roles and responsibilities.

The intent of the MPA is to ensure full compliance and efficient implementation with SAWPA's management and oversight that is based on a set of uniform and consistent policies and procedures. By entering into the MPA the agencies agreed to the cooperative implementation of required powers and responsibilities for ensuring implementation of the Brine Line Pretreatment Program.

SAWPA was named the Delegated Control Authority, responsible for the management, oversight and administration of the Brine Line Pretreatment Program for all dischargers to the Brine Line. SAWPA is responsible for all aspects of the Program including but not limited to permitting, monitoring, inspection, enforcement, and reporting.

Each agency discharging to the Brine Line shall be responsible for its customer's discharges that become a part of the agency's overall discharge to the Brine Line and shall implement and maintain its own programs to ensure its responsibility to the MPA is being carried out as agreed.

Western's SSMP and its complimentary documents and programs support the MPA and mesh seamlessly with the intent of the MPA to provide legal authority to Prevent illicit discharges from entering the Brine Line.

A copy of the MPA can be found in Appendix 3.

### **State Order Section 3(b) Proper Design and Construction**

*Each Enrollee must demonstrate that it possesses the necessary legal authority to require that sewers and connections be properly designed and constructed.*

Western publishes the Board of Director's approved Developer's Handbook, Standard Specifications and Standard Drawings for Water and Sewer Facilities to require that facilities be properly designed and constructed and that adequate right of way be provided.

From Section 4.3 (A) of the Wastewater Ordinance:

The connection to the District's Sanitary Sewer System shall conform to the requirements of applicable building and plumbing codes and current District rules and regulations. All such connections shall be gas and watertight, and shall be tested as described in the District's Developer Handbook & Standard Drawings for Water and Sewer Facilities. Any deviation from such codes and/or District rules and

regulations must be approved, in writing, by the District prior to the installation of the connection.

From Section 4.3 (C) of the Wastewater Ordinance:

Whenever, in the opinion of the District, there exists the possibility of sewage from the District's Public Sewer Main flooding through the connection into the connected structure as a result of hydraulic characteristics in the District's Sanitary Sewer System, a backwater overflow prevention device, approved by the District, shall be installed in the Discharger's lateral at the Discharger's expense.

From Section 4.5(A1 & A.4) of the Wastewater Ordinance:

Provide Pretreatment, as required, to comply with this Ordinance.

Provide detailed plans showing the treatment equipment, systems, devices, and operating procedures. Said plans shall be submitted to the District for review and approval prior to beginning construction or installation of any Pretreatment equipment. The review of such plans and operating procedures will in no way relieve the Industrial User of the responsibility for treating wastewater to a level acceptable to the District under provisions of this Ordinance.

From Section 4.9(A) of the Wastewater Ordinance:

Industrial Users shall provide, as requested by the District, drawings, schematics, or process and instrumentation diagrams during the initial sewer connection or whenever a site modification occurs.

### **State Order Section 3(c) Insure Access and Maintained Right of Way**

*Each Enrollee must demonstrate that it possesses the necessary legal authority to ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency.*

Western has the means and authority to ensure access for maintenance, inspection and repair of its entire system including those portions of laterals maintained by Western using public right-of-way, exclusive easements or fee title ownership. Rights of access are generally obtained at the time the property applies for sewerage service but may be acquired in advance through developer agreements. Access is a condition of sewer service.

From Section 4.10(B) of the Wastewater Ordinance:

As a condition of sewer service, a District easement or right-of-way may be required for the installation, protection, maintenance, or replacement of District facilities on private property. Persons and property owners shall be responsible for compliance with the terms of the easements. At no time shall any material, debris, obstacles, vehicles or other obstructions be placed (temporarily or permanently) in a manner that prevents immediate access to District facilities. Costs incurred by the District as a result of any Person or property owner's failure to comply, may be billed to the said Person or property owner. The Person is responsible for maintenance of the Private Lateral and the easement or right of way it is in to the point of connection with the District Sanitary Sewer System.

### **State Order Section 3(d) Limit Fats, Oils and Grease**

*Each Enrollee must demonstrate that it possesses the necessary legal authority to limit the discharge of fats, oils, and grease and other debris that may cause blockages.*

Western requires that any Person discharging wastewater containing fats, oils and grease or solids at excessive levels, as solely determined by the District, be required to install and maintain a gravity separation interceptor (Interceptor). Adequate Interceptor maintenance is the responsibility of the Person, User, or Discharger to protect the operation of Western's Sanitary Sewer System facilities, its POTWs and/or downstream POTWs owned by other Public Agencies. The following is stated in the Wastewater Ordinance.

From Section 4.4(A) of the Wastewater Ordinance:

Any Person, that Discharges wastewater containing fats, oils and grease or solids at excessive levels, as solely determined by the District, shall be required to install and maintain a gravity separation interceptor (Interceptor). Sanitary wastewater shall not be allowed to pass through the Interceptor. The Interceptor shall conform to District standards and the operational fluid capacity shall be determined by the District. The interceptor shall have a minimum operational fluid capacity of 750 gallons.

From Section 4.4(B.3) of the Wastewater Ordinance:

If the District finds, either by engineering knowledge or by observation that an existing Interceptor is incapable of adequately eliminating Prohibited Discharges (Article 3.1), is structurally inadequate, or is undersized for the intended use, the District shall condemn such Interceptor and declare that the Interceptor does not meet District requirements. The User shall be required to install, at the User's expense, an Interceptor which is acceptable to the District.

From Section 4.4(E.1) of the Wastewater Ordinance:

The Interceptor shall be cleaned by a licensed and permitted Waste Hauler on a periodic basis which assures that the Interceptor will operate as designed at all times. An Interceptor is not considered adequately maintained, if for any reason the Interceptor is not in good working condition (i.e. missing or broken internal plumbing) or if the operational fluid capacity has been reduced by more than 25%.

### **State Order Section 3(e) Enforcement of Violations**

*Each Enrollee must demonstrate that it possesses the necessary legal authority to Enforce any violation of its sewer ordinances.*

Article 6 beginning with Section 6.1 of the Wastewater Ordinance addresses enforcement.

From Section 6.1(A-E) of the Wastewater Ordinance:

The District is mandated by State Water Resources Control Board Order No. 2006-0003 and its amendments to enforce requirements promulgated by Regulatory Agencies. The District shall take enforcement action as necessary against any Person, User or Discharger to:

- A. Prevent illicit discharges into the Sanitary Sewer System (examples may include infiltration, stormwater, chemical dumping, unauthorized debris, cut roots, unauthorized liquids or solids, compounds, objects, material and elements).
- B. Require that sewers, sewer laterals, connections and other Sanitary Sewer System components be properly designed and constructed.
- C. Ensure access for maintenance, inspection, sampling and repairs for the Sanitary Sewer System and portions of the lateral owned and/or maintained by the District.
- D. Limit the Discharge of fats, oils and grease and other substances, debris and material that may cause blockages.
- E. Enforce this Ordinance.

From Section 6.3(A) of the Wastewater Ordinance:

District Management, upon finding a violation by any Person, may employ any of the remedies set forth in this article, subject to due consideration of the following:

- 1. The magnitude of the violation;
- 2. The duration of the violation;
- 3. The effect of the violation on the District's Sanitary Sewer System and receiving POTW;
- 4. The significance of the violation as compared with Regulatory Agency requirements;
- 5. The violation history of the Person;
- 6. The good faith efforts of the Person to remedy the violation.
- 7. In the case of a violation by a User, the magnitude of the violation when compared with the User's Waste Discharge Permit.

From Section 6.11(A-C) of the Wastewater Ordinance:

District Management may immediately suspend a User's discharge permit, and issue a Cease and Desist Order to the User, whenever such action is necessary to stop an actual or threatened discharge which reasonably appears to present or cause an imminent or substantial endangerment to the health or welfare of individuals or the environment.

District Management may also immediately suspend a User's discharge permit and issue a Cease and Desist Order to the User if the User's action(s) threatens to interfere with the operation of the District's Sanitary Sewer System or receiving POTW.

Any User issued a Cease and Desist Order shall immediately stop its Discharge. In the event of a User's failure to immediately comply with the Cease and Desist Order, District Management may take such steps as deemed necessary, including immediate severance of the sewer connection, to prevent or minimize damage to the District's Sanitary Sewer System, the receiving POTW, the receiving stream, or endangerment to any individuals or environment.

From Section 6.12(A) of the Wastewater Ordinance:

Any User found by District Management to have violated any terms of this Ordinance shall be subject to Discharge Termination.

From Section 6.14 of the Wastewater Ordinance:

In certain circumstances, judicial enforcement may be appropriate. Such remedies may include, but are not limited to, injunctive relief, civil penalties, and criminal prosecution.

From Section 6.17 of the Wastewater Ordinance:

A Person who willfully or negligently violates any provision of this Ordinance, a permit, or order issued hereunder, or any other pretreatment standard or requirement shall, upon conviction, be punishable by a fine or imprisonment or both. Each violation and each day in which a violation occurs may constitute a new and separate violation of this Ordinance and shall be subject to the penalties contained herein.

## **SECTION 4: OPERATIONS & MAINTENANCE**

### **State Order D.13.iv**

*The SSMP must include the following elements if appropriate and applicable to the Enrollee's Sanitary Sewer System:*

- (a) up to date map of the sewer system that shows all pipe reaches, manholes, siphons, valves, and pumps if any,*
- (b) routine preventative maintenance program and operations program,*
- (c) rehabilitation and replacement program,*
- (d) operations and maintenance training program, and*
- (e) part inventory program including identification of critical replacement parts.*

### **State Order Section 4(a) Mapping of the Sanitary Sewer System**

*Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable storm water conveyance facilities.*

Western maintains mapping for all its Sanitary Sewer Systems in electronic format and hard copy. Current examples of Westerns Sanitary Sewer Systems include:

Western's systems tributary to the Western Water Recycling Facility near March Air Reserve Base; for example, Woodcrest south of Van Buren Boulevard, Boulder Springs and Mission Ranch, generally known as Western's East Retail Area.

Western systems tributary to the WRCRWA treatment facility; for example, Western's El Sobrante, Lake Hills and Victoria Grove areas tributary to WRCRWA, generally known as Western's West Retail Area. And Western's Corona Diversion Structure and Pipeline, constructed to convey wastewater from the City of Corona to WRCRWA.

Western systems tributary to SAWPA's Inland Empire Brine Line (IEBL) system; for example, Western laterals tributary to SAWPA's IMBL system, the most notable being the CRC Lateral that conveys wastewater from the California Rehabilitation Center and Naval Surface Warfare Center in the City of Norco to SARI Reach IVB.

Western pipelines in and around the Inland Port at March Field tributary to the Eastern Municipal Water District system.

Western pipelines within its Murrieta Division near the southern boundary of Western's jurisdiction. Portions of the service area are tributary to a treatment plant owned and operated by the Rancho California Water District and portions are tributary to a treatment plant owned and operated by the Eastern Municipal Water District.

Electronic mapping is provided by Nobel System's GeoViewer Online to bring all of the power and functionality of high end GIS to the Western O&M team through the World Wide Web (www). The O&M team members can securely access Western's GIS data using an Internet Browser from any PC with an internet connection and assigned member's unique User Name and Password. GeoViewer Online includes search and query tools, and also includes a number of customizable reporting options, that allows the O&M team members to set up frequently used forms on the system to generate standard reports with data and maps from the GIS.

The State Order calls for a map that shows all pipe reaches, manholes, siphons, valves and pumps. Western's GIS system provides the detailed data required. If the internet service provider or internet transmitters are down for an emergency the O&M team members will use hard copy maps on file at the El Sobrante Operations Center for detailed mapping. The hard copy maps can be found in the El Sobrante Operations Center map room, a room dedicated to hard copy maps as well as a room with monitors and computer systems to access maps electronically. During an emergency and in the event the electronic copies are unavailable; these hard copy maps can be reproduced using copy machines. The El Sobrante Operations Center is self sufficient with on site electrical power generation equipment, tested weekly for readiness so lighting systems, computers and copy machines will be functioning.

The Engineering Division maintains hard copy maps at the Meridian Office including sewer blueprints and detailed cut sheets showing vertical location of sewers. Adequate mapping detail is provided in both electronic form and hard copy to meet or exceed the requirements of the State Order. The Meridian Office building also has a back-up generator to provide electrical power to all electrical lighting and office equipment. Hard copies of the Murrieta Division Sanitary Sewer System are also available at the Murrieta Division Office in the City of Murrieta. Computers are also available at the Murrieta Division Office to support access to electronic formats.

The following information is contained in both the electronic and hard copy formats:

- Drawing Scale
- North arrow
- Date map was drafted
- Property lines
- Landmarks (water bodies, streams, roads, etc.)
- Manholes and other access points
- Location of building laterals

- Street Names
- Force mains
- Lift Stations
- Main, trunk interceptor and force main sewer lines
- Easement lines and dimensions
- Pipe material
- Pipe diameter
- Slope
- Manhole rim elevation
- Manhole coordinates
- Manhole invert elevations
- Distance between manholes
- Sewer invert elevations

All manholes have a unique identifying number on the GIS and the sewer line between manholes is identified by pipe size and material, length between manholes and upper and lower elevations.

#### **State Order Section 4(b) Operations and Maintenance Program**

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

Western has a routine preventative maintenance program including routine sewer cleaning programs. Inspection of sewers and maintenance access structures (MAS) including manholes and vaults is part of the sewer cleaning program and condition reports are a part of the Daily Line Cleaning Report filled out by the field team members. Report of problems on the Daily Line Cleaning Report triggers more frequent cleaning and/or CCTV work in compliance with the State Order. See the next subsection (4-C) for more detail about the use of CCTV.

To support the routine maintenance program the O&M team has developed a computerized sewer inspection program. The Standard Operating Procedure (SOP) For Collection System Maintenance and Line Cleaning Frequency provide necessary detail to determine the sewer collections system cleaning frequency including associated maintenance activities and to perfect GIS information. As stated in the SOP, the ability to effectively manage a sewer collection system is determined by proper design and preventative maintenance. The benefits of an effectively operated and maintained collection system include management and protection of the communities' assets, service to the customer, regulatory compliance, protection of the safety and health of the public, environmental protection, and cost-effective use of agency resources.

The SOP describes Hydraulic Cleaning, CCTV Inspection, MAS Inspections, Flume Inspections, Force Main Inspections, Air Valve Inspections, Lift Station Maintenance and Inspection Activities, GIS Mapping Accuracy and Record Keeping Activities.

MAS inspection is a part of the line-cleaning program. All manholes and vaults within the Sanitary Sewer Systems are being inspected and noted on the Daily Line Cleaning Report along with findings during the cleaning of the adjacent sewers. When manholes are inspected, the following observations are recorded:

- Conditions of the manhole frame and cover
- Evidence of surcharge
- Offsets or misalignments
- Details of the primary cause of cracks or breaks in the manhole or pipe, including blockages
- Presence of corrosion (and how extreme)
- If repairs are necessary
- Manhole identifying number and location
- Wastewater flow only if surcharged or backed up
- Presence of infiltration, location, and estimated quantity
- Accumulations of FOG, debris and grit
- Recommended date for next inspection

A routine day for the Sanitary Sewer System cleaning crew is as follows:

At the beginning of each day, the collection crew is given a packet of work orders. Each time a section of the sewer is cleaned, the collection crew(s) completes a cleaning record of that section of sewer including:

- Date and time of the cleaning
- Method of cleaning
- Identity of the cleaning personnel
- Cause of any potential stoppages or stoppages
- Location of stoppage or routine cleaning activity
- Any further actions that are necessary or taken

When the job has been completed, the collection crew records their findings on the work order and all the completed work orders are returned at the end of the day with the statistics for the day, e.g. sewer line footage that was cleaned, CCTV footage, etc.

The system employed by Western for rating condition of the various components of the Sanitary Sewer System is similar to the National Association of Sewer Service Companies (NASSCO) system and was derived from guidelines published by the US EPA and Office of Water Programs. Western's rating system can be incorporated into existing data base information systems and is therefore preferred over the NASSCO rating system. NASSCO

provides guidance to less knowledgeable staff such as those with less focused interest in the private sector. Therefore private service companies with NASSCO membership provide some assurance that private company field crews are trained in Sanitary Sewer System inspection and rating.

### **State Order Section 4(c) Rehabilitation and Replacement Program**

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

As discussed above in 4b, rehabilitation and replacement planning begins with the SOP and information from field sewer cleaning teams reported on the Daily Line Cleaning Report. Reported problems trigger CCTV when appropriate to assess the extent of current blockage and to predict potential for future blockage.

Western's closed circuit television (CCTV) inspection equipment is used for Western's sewers up to a maximum of 6 inches (typically laterals). CCTV inspections of the larger sewers are contracted out. Video inspections address the following:

- Pipe size, type, length, and joint spacing
- Distances are recorded
- Structural deficiencies
- Corrosion
- Inflow/Infiltration
- Illegal connections
- CCTV operator name
- Cleanliness of the line
- Location and identification of the sewer and manholes being examined

Once the CCTV examination is completed the sewer is rated based upon the defects discovered during the video examination.

When the problem is not easily remedied through more frequent cleaning, it is added to Maintenance Work Plan as a repair/replacement project into Western's Access Database (also referred to as a rehab entry in State documentation). This master work schedule includes costs for labor and maintenance. The numerous entries are summarized with

major activities and anticipated costs for the upcoming fiscal year with priorities identified. With an iterative approach the work and costs are revised based on current estimates and priorities, then when the draft is final, the requests are submitted to Western management for consideration by Western's Board of Directors for the upcoming fiscal year budget. Western's procedure for rehabilitation and replacement of the Sanitary Sewer System meets or exceeds the requirement of the State Order.

#### **State Order Section 4(d) O&M Training Program**

*Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained.*

Western provides training to the O&M team on a regular basis and requires team members to be certified by a professional organization such as the California Water Environment Association, signifying the degree of knowledge retained and the years of experience on the job applying this knowledge. Additionally, all O&M team members are evaluated at least once per year to determine level of proficiency and performance for the purpose of determining compensation. Western's training program includes classroom settings, simulated activities at the El Sobrante Operations Center and on-the-job training in the field. Formal classroom and El Sobrante Operations Center sessions are documented on the "Operations Department Training Documentation Form", containing trainee's name, date, type and description of training. A few examples of training programs include "Sampling", "USA Dig-Alert", "Service Truck Operation" and "Vactor Truck Operation".

Management has developed an overall training protocol as follows.

1. O&M SOP
2. Legal Authority
3. FOG
4. ERP
5. OERP
6. CIP
7. Standard Boilerplate Specs
8. Standard Technical Specs
9. Standard Drawings
10. Record Keeping
11. System Master Planning
12. Public Communication

The O&M Team also receives training to deal with customer requests. Under the Western's customer service program, the O&M Team accepts service requests from Western's customers, which describe the sewer problems the customer is having or has observed. These problems could be related to a private lateral, foul odors, or problems with a sewer. When a service request call is received, a service request form is completed; this form includes the following information:

- Western's personnel who received the complaint or request
- Nature of the complaint or request
- To whom the follow-up action was assigned
- Date of the complaint or request
- Date the complaint or request was resolved
- Name, address, and telephone number of the complainant or requestor
- Location of the complaint or request
- Date the follow-up action was assigned
- Cause of the problem
- Investigation findings
- Corrective actions taken

The O&M Team responds as soon as the call is received during working hours or typically within 60 minutes if the call is received after hours. Western's goal is to resolve all issues related to a service call as soon as possible, but not later than the close of the next business day.

#### **State Order Section 4(e) Equipment and Parts Inventory Program**

*Provide equipment and replacement part inventories, including identification of critical replacement parts.*

The O&M Team maintains an equipment parts inventory for the equipment used to service various components of the Sanitary Sewer System as well as equipment and material that make up the Sanitary Sewer System, including pipe for sewers, components for lift stations and manhole rings and appurtenances for MAS. Service equipment includes for example Western's Vactor trucks, the Emergency Response trailer, portable CCTV equipment, hose reel trailer for by-pass pumping, portable compressors, portable pumps, portable generators and hand tools. The Sanitary Sewer System parts inventory list maintained by Western is shown hereafter within Appendix 4. In general, critical parts including pipe sections for sewers of various diameter and concrete manholes bases, rings and tops that are staged at the El Sobrante Operations Center or remote storage facility. Repair material and equipment are a part of the warehouse inventory. The warehouse system is operated with a computerized minimum and maximum inventory system that can be tailored as needed based on past and current history of usage.

## **SECTION 5: DESIGN AND CONSTRUCTION STANDARDS**

### **State Order D.13.v**

*The Enrollee shall have:*

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

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

### **State Order Section 5(a) Design and Construction Standards**

*Maintain design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems.*

Copies of Western's Technical Provisions of its standard specifications and General Provisions of its standard specifications for construction of new facilities are provided in Appendix 5. Technical Provisions of the specifications address technical construction details and requirements during construction for new and replacement facilities. General Provisions of the specifications address legal detail, requirements and procedures. Both provisions are made a part of every public works contract. Technical Provisions and Standard Drawings are available on the Western website. Examples of Standard Drawings include:

- Typical Plan layout Sewer Systems
- Typical Pipe Bedding Vitrified Clay Pipe Extra Strength
- Sewer Lateral "Normal Cut"
- Sewer Lateral "Deep Cut"
- Precast Concrete Manhole
- Sewer Precast Concrete Sampling Manhole
- Drop manhole
- Sewer Clean Out & Terminus Manhole
- Manhole Cover and Frame
- Connection to Existing Main
- 5' Diameter with Cast in Place Base
- Shallow Manhole
- 4' and 6' Sewer Cut-In Wye Connections
- Sewer On-Site Cleanout
- Sewer Sample Wye
- FOG Interceptor

A copy of Western's design criteria is also provided in Appendix 5 and made available on the Western website (within the Developer's Handbook) to establish planning and design requirements for Sanitary Sewer Systems with such parameters as depth of water to diameter of pipe (d/D) ratios, minimum pipe size, system loading in gallons, and other data needed to properly design sewers, lift stations, MAS and other components.

### **State Order Section 5(b) Procedures for Inspection and Testing**

*Maintain procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.*

Copies of Western's requirements for establishing and implementing procedures and standards for inspecting and testing the installation of new facilities prior to acceptance are attached within Appendix 5. General and Technical provisions of Western Construction Specifications provide detailed information about Western's requirements for inspection with instructions to the contractor for everything from notification to begin work to acceptance of the facility.

Wastewater personnel are routinely involved in the sewer design review process by being able to provide historical and current use information for Engineering personnel. This information is valuable in the design of sewer lines and appurtenances to insure that the project will meet expectations.

As stated previously in Section 2, Western staff includes a Construction Manager, Construction Supervisor, and a team of Construction Inspectors to manage, inspect, and test newly constructed or rehabilitated facilities.

For example:

The new manholes that are installed are visually tested to determine if there are any conditions of inflow or infiltration. This activity is particularly important in areas with traditionally shallow groundwater tables.

All new sewer projects are CCTV inspected after completion. This includes all private sewer systems in commercial projects. The video inspection and inclinometer testing is useful to determine if the private sewer systems were built according to design and that all construction debris has been removed from the new facilities.

## **SECTION 6: EMERGENCY RESPONSE PLAN**

### **State Order D.13.vi**

*The Enrollee shall have an Emergency Response Plan that includes:*

- (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 proper response to all overflows,*
- (c) Procedures to ensure prompt notification to appropriate regulatory agencies and other affected entities (e.g. health agencies, Regional 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 Plan (MRP). All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Board Waste Discharge Requirements (WDRs) or National Pollution Discharge Elimination System (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 OERP and are appropriately trained,*
- (e) Procedures to address emergency operations, such as traffic control and crowd control and other necessary response activities, and*
- (f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.*

Note that Western' Overflow Emergency Response Plan (OERP) has been approved by Western's Board of Directors as a stand-alone document and is also contained within Appendix 6.

### **State Order Section 6(a) Notification Procedures**

*The Enrollee shall have an Emergency Response Plan that includes proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner.*

Primary responsibilities of each employee in the emergency response team are outlined in Western's Overflow Emergency Response Plan (OERP) and in Appendix 6. The first responder is not a named individual because the assignment rotates among the members of the call team. The table identifies the first responder as the on duty O&M team member on "Call Team C" and the cell phone number of the cell phone carried by the call team member on call 24/7. Although the individuals change the phone does not. The phone is handed from the call team member coming off duty to the next person on call; so, calling that C Team phone number will always alert the person on call at that moment.

The on duty Call Team member will either investigate the emergency or telephone a team member who can respond faster in the event the emergency is at a location some distance from where the on duty C Team member is when receiving the call. If the incident is deemed an emergency, such as a SSO, the Call Team member will immediately contact the Spill Response Supervisor or if unavailable will contact the Deputy Director of Operations. The Call Team member and Spill Response Supervisor and/or Deputy Director of Operations will collaborate and mobilize an emergency response crew immediately.

A call out list is provided in Appendix 6, Table 6-2. The list is labeled "Call Out List with SSO Contact Information, Outside Vendor Resources". The list provides company name, addresses, contact names and title and phone numbers of private contractors who have said they are willing to assist with an emergency including a SSO. Table 6-1 indicates the Spill Response Supervisor is responsible for mobilizing "Outside Vendor Resources" a.k.a. outside services. Outside Vendor Resources will be called in to assist with an emergency on an as needed basis as determined by the Spill Response Supervisor or Wastewater Operations Manager. The capabilities of the outside service providers are known and are briefly described in Table 6-2. The funding authorities of the Spill Response Supervisor and the Wastewater Operations Manager are listed on Table 6-2 as well as the contractual relationship with each vendor based on time and materials or on a not-to-exceed lump sum amount.

If the emergency is a SSO, the Spill Response Supervisor or the Wastewater Operations Manager will notify the regulatory agencies by phone for an attempt to make immediate contact and by email to document the time and to memorialize the phone call and information currently available.

The major portion of Western's jurisdictional area is within the Santa Ana Regional Water Quality Control Board, Region 8, area. Western's Murrieta Division is entirely within the San Diego Regional Water Quality Control Board, Region 9 area. The division between the two Regional Boards is in the southern part of Western's service area and can be approximated by drawing a line from the intersection of Bundy Canyon Road and Interstate 15 to the intersection of Scott Road and Interstate 215 and easterly to the northern shore line of the Metropolitan Water District Diamond Valley Reservoir.

Any reportable emergencies in the Murrieta service area would be directed to San Diego Region 9. All other reportable emergencies within Western's service area would be directed to Santa Ana Region 8. Contacts for the two Regional Boards are shown on the "Reportable Incident Notification Log Sewer Spill" form included hereafter within Appendix 6.

A "Command and Management Organization Chart" has also been included in Appendix 6 to pinpoint the person responsible for each element of the SSMP such as the OERP and SSO response, and the one person responsible for the entire SSMP. Responsibility has been linked to the severity of the SSO using Category 2 (under 1,000 gallons) or Category 1 (over 1,000 gallons) SSOs. For example, OERP responsibility may be elevated to the Wastewater Operations Manager for Category 2 SSOs but with more severe and immediate emergencies (including Category 1 SSOs) directed to the Director of Operations.

### **State Order Section 6(b) Proper Response to SSOs**

*The Enrollee shall have an Emergency Response Plan that includes a program to ensure proper response to all overflows.*

Proper response procedures are outlined in Western's Overflow Emergency Response Plan (OERP) and in Appendix 6. The SSMP notification information is updated routinely with copies distributed to Call Team members (first responders). A list has been included in Appendix 6 to provide contact names for major dischargers that would be significantly impacted if the sewerage flow from their building was curtailed while a downstream SSO was being corrected.

Contingency plans have been made a part of the SSMP/OERP for SSOs at lift stations. The contingency plans name the lift stations with on site generators and those without, and the plans stored in the GIS System and in map rooms at both the El Sobrante and Meridian offices provide pump around or trucking requirements and other site-specific procedures.

The Responder Flow Chart in Appendix 6 names the responders that can best respond to the various Western Sanitary Sewer Systems such as the Western WRF tributary system in the Woodcrest area, the Western CRC Lateral and other laterals tributary to the IEBL system, the WRCRWA tributary system of El Sobrante and Lake Hills, the Inland Port system tributary to the Eastern Municipal Water District and the Murrieta system tributary to either the Rancho California Water District or the Eastern Municipal Water District. The Flow Chart provides a hierarchy listing to identify the first responder, the first backup responder the second backup responder and so on. The likely candidate for first responder would be the C Call Team member for that day. The C Call Team member would request immediate assistance from a C Team member. The first responders will set up traffic control and pedestrian notification as indicated in 6(e) below.

### **State Order Section 6(c) Names of Officials to be contacted at Regulatory Agencies**

*The Enrollee shall have an Emergency Response Plan that includes procedures to ensure prompt notification to appropriate regulatory agencies and other affected entities (e.g. health agencies, Regional 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 Plan (MRP). All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Board Waste Discharge Requirements (WDRs) or National Pollution Discharge Elimination System (NPDES) permit requirements. The SSMP should identify the officials who will receive immediate notification.*

Names of officials are listed in Western's Overflow Emergency Response Plan (OERP) and in Appendix 6. A Communication Chart in Appendix 6 names specifically which agencies under what circumstances will be notified. The Communication Chart is linked to the Reportable Incident Notification Log Sewer Spill discussed above in 6(a) to provide the names of the individuals within the regulatory agencies that need to be notified. The communication chart also provides notification direction and information for non regulatory agencies such as local police, fire, CHP, Caltrans, City and County public works, major dischargers impacted, and downstream entities such as SAWPA and downstream POTW operators (OCSD, RCWD, EMWD, Corona, WRCRWA and Western WRF).

### **State Order Section 6(d) OERP Training for Staff and Contractors**

*The Enrollee shall have an Emergency Response Plan that includes procedures to ensure that appropriate staff and contractor personnel are aware of and follow the OERP and are appropriately trained.*

Training procedures are outlined in Western's Overflow Emergency Response Plan (OERP) and in Appendix 6. Western management holds meetings with its O&M Team weekly with segments or the entire meeting devoted to training. A Training Documentation Form is filled out and signed by each employee in attendance along with the topic of discussion when formal training is offered. The O&M Team will participate in three different types of training each year, (1) Orientation, (2) Tabletop Exercises and (3) Functional Full Scale Exercises. Training includes the entire SSMP. Training goals include coverage of the entire SSMP each year with one State Order Section each month beginning with Section 1 in January and ending with Section 11 in November as follows:

### **SSMP TRAINING SCHEDULE**

State Order Section	SSMP Section	Training Subject(s)	Training Month
D13.i	1	State Order, Western's Sewer Systems and Section 1 - Goals	January
D13.ii	2	Organization	February
D13.iii	3	Legal Authority, Western's Wastewater Ordinance	March
D13.iv	4	Operation and Maintenance Program	April
D13.v	5	Design and Performance Provisions	May
D13.vi	6	Overflow Emergency Response Plan	June
D13.vii	7	FOG (fats, oils and grease) Control Plan	July
D13.viii	8	System Evaluation and Capacity Assurance Plan	August
D13.ix	9	Monitoring, Measurement and Program Modifications	September
D13.x	10	SSMP Program Audits	October
D13.xi	11	Communication Program	November

Western management provides information from the SSMP to contractors named in Section 6(a) above and explains the requirement that the contractors conduct training with their crews using the SSMP information appropriate to the services they provide.

#### **State Order Section 6(e) Procedures to Address Emergency Operations**

*The Enrollee shall have an Emergency Response Plan that includes procedures to address emergency operations, such as traffic control and crowd control and other necessary response activities.*

Proper emergency operations' procedures are outlined in Western's Overflow Emergency Response Plan (OERP) and in Appendix 6. The first responder will call for the delivery of

Western's emergency response trailer that has been equipped with traffic control and crowd control equipment.

A standard traffic control plan has been included in Appendix 6 to guide first responders in setting safe spacing and tapers for cones and delineators and safe spacing for emergency zones and work zones.

Traffic control and crowd control procedures are as follows:

Category 2 Spills (less than 1,000 gallons)

- A. Contact Mutual Aid Wastewater Departments as needed.
- B. Perform lane closures as needed.
- C. Close any affected entrances or exits from all public and private facilities.
- D. Place proper signage for any lane closures including contaminated area signs.
- E. Use caution tape and barricades to protect pedestrians from contaminated area.

Category 1 Spills (greater than 1,000 gallons)

- A. Assess spill situation.
- B. Contact Mutual Aid Wastewater Departments as needed.
- C. Perform lane closures as needed.
- D. Close any affected entrances or exits from all public and private facilities.
- E. Place proper signage for any lane closures including contaminated area signs.
- F. Inform local police and sheriff's department of any law enforcement needed for road closures and traffic control.
- G. Delegate the responsibilities to Mutual Aid team members to inform general public of hazards using signage, or other means to communicate effectively.
- H. Block public access to hazard using barricades, cones and caution tape.
- I. Contact Public Affairs staff to enlist assistance with public communication

### **State Order Section 6(f) Steps to Protect Waters of the United States**

*The Enrollee shall have an Emergency Response Plan that includes a program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.*

SSO containment procedures are outlined in Western's Overflow Emergency Response Plan (OERP) and in Appendix 6. The first responder, after the initial assessment and immediate reporting to the Spill Response Supervisor, will make all reasonable efforts to contain the SSO by initiating actions to stop, divert or contain the discharge.

Actions to contain a spill include emergency dyke building around the spill with hand tools and upon arrival of heavy equipment, the building of dykes in drainage channels leading to Waters of the United States. Advance permission process includes telephoning the contact person at the local public works jurisdiction or flood control district. The first responder will contact on duty O&M team members or other On Call team members to monitor upstream lift stations to prevent wet well overflows if the lift station has to be shut down to limit the magnitude of the downstream SSO. Upstream customers with major discharges will be contacted by the Spill Response Supervisor or a designated team member to limit process discharges. Water connections may be shut off at the meter in instances where control of the SSO is not possible without major reduction of upstream discharges.

### **Overflow Emergency Response Plan (OERP)**

Introduction: Western's Overflow Emergency Response Plan addresses those mandatory SSMP provisions outlined in Section D, 13 (vi) Overflow Emergency Response Plan of SWRCB Order No. 2006-0003.

Western's Overflow Emergency Response Plan provides specific instructions for responding to Sanitary Sewer Overflows (SSOs). The SSOs are classified in accordance with SWRCB Order No. 2006-0003. The categories of spills, the response and reporting requirements are detailed hereafter.

SSOs can be either: Category 1 – Greater than 1,000 gallons or that result in a discharge to drainage channel and/or surface water; or to a storm drainpipe that was not fully captured and returned to the sanitary sewer system; Category 2 – Less than 1,000 gallons; or Private sewer systems and laterals.

Possible SSOs occur in either the Sanitary Sewer System or at the POTW.

The response procedures for SSOs are determined by the classification and location of the SSO. While the objectives of the response remain the same, the coordination and personnel chain of communication is slightly different.

For spills at the Wastewater Treatment Plant onsite personnel report the spill to the Wastewater Treatment Operations Supervisor and/or Plant Manager who makes operational decisions regarding the containment, recovery, and clean-up. All documentation and reporting of the spill (SSO Report Form) is performed by the Wastewater Treatment Operations Supervisor or Plant Manager or the supervisor's designee.

For spills in the Sanitary Sewer System (lift station or collection system), O&M Team personnel report the spill to the Wastewater Collections Operations Supervisor or the Supervisor's designee who makes operational decisions regarding the containment, recovery, and clean-up. All documentation and reporting of the spill (SSO Report Form) is

performed by the Wastewater Collections Operations Supervisor or the supervisor's designee. All notifications are also provided to appropriate response personnel. Upon arrival at the site, the O&M Team personnel collect essential information regarding SSO location, potential cause(s), initial estimates of volume, containment requirements, etc. Additional staff and equipment are dispatched based upon determinations made during the initial site evaluation.

SSO measurement and monitoring details are provided in Appendix G.

## **SECTION 7: FOG CONTROL PLAN**

### **State Order D.13.vii**

*The Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the Sanitary Sewer System. This plan shall include the following as appropriate:*

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

*7(b) A plan and schedule for the disposal of FOG generated within the service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a Sanitary Sewer System service area,*

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

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

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

*7(f) An identification of Sanitary Sewer System sections or pipe reaches subject to FOG blockages and establishment of a cleaning maintenance schedule for each section or pipe reach, and*

*7(g) Development and implementation of source control measures for all sources of FOG discharged to the Sanitary Sewer System for each section (pipe reach) identified in (f) above.*

Note that Western's Fats, Oils and Grease (FOG) Program has been approved by Western's Board of Directors as a stand-alone document and is also contained within Appendix 7.

### **State Order Section 7(a) Public Education for Proper Disposal of FOG**

*The Enrollee's FOG Control Plan shall include an implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG.*

Educational procedures are outlined in Western's Fats, Oils and Grease (FOG) Program and in Appendix 7. Public outreach includes visits by inspector's to known FOG producing customers. A FOG information brochure is available for the inspector to leave with employees at FOG producing customer premises. The brochures can be handed out each time the inspector visits, knowing that employees may be different on different dates. The brochure and Western's website provide the following information:

## **Fats, Oils, and Grease Control Program**

Western's Fats, Oils and Grease (FOG) Control Program addresses those mandatory SSMP provisions outlined in Section D, 13 (vii) FOG Control Program of SWRCB Order No. 2006-0003.

### **Background**

The discharge of fats, oils, and grease (FOG) from animal and vegetable sources can create sewer line stoppages that result in sanitary sewer overflows (SSOs). Two main sources of FOG discharges are from the restaurant industry and food service facilities (e.g. cafeterias, penal institutions, schools, colleges, and universities with food services, and commercial kitchens) and residential users. The FOG discharges may be a result of poor housekeeping practices at restaurants and other food service facilities and from poorly informed decisions by residential users. The result is the same: SSOs.

The discharge of hot or warm FOG to the sewer causes stoppage problems as a result of FOG accumulation on the upper surfaces of sewer lines due to the floating and non-mixing properties of FOG in water. The depositions of the FOG on the upper surfaces of a sewer line are created during high flows and by FOG obstructions downstream that restricts the sewer flows and cause the water level to rise.

Grease interceptors are gravity separation devices to separate FOG and solids from the Customer's wastewater discharge by allowing solids to be collected using settling and/or floating methods. The use of biological or chemical agents in grease interceptors to liquefy FOG prior to discharge is problematic and prohibited. Bacteria and enzymes act by reducing the long chain fatty acids into smaller chain molecules. A bacteriological system would need 24 – 72 hours to completely aerobically metabolize the FOG to carbon dioxide and water. A gravity separation interceptor has about 30-120 minutes of detention time. The result of bacterial or enzymatic product usage creates liquefaction or emulsification of the FOG in the interceptor. This liquefied FOG is subsequently discharged to the sewer where any further degradation of the FOG by the bacteria or enzyme is prevented due to the dilution of the material and other interferences in the receiving sewage. The liquefied FOG begin to adhere to sewer line interior walls, deplete the oxygen content of the wastewater due to the natural degradation microbes present in wastewater and create odor problems due to the depleted oxygen content. Therefore, it is unlawful to add any biological or chemical agents to the sewage that would cause FOG to liquefy.

Western's FOG program focuses on Best Management Practices (BMPs) designed to prevent the discharge of FOG to the sewer system and to educate the restaurants, food service industry and homeowners about the BMPs.

### **Fog Program Elements**

Western utilizes the following FOG Program Elements to minimize the discharge of FOG to the Western's sewer collection system.

1. Site inspections and data sharing
2. Public education and outreach
3. Best Management Practices (BMPs)
4. BMP Adoption
5. BMPs for Food Preparation Area
6. BMPs for Maintenance
7. Interceptor retro fits
8. Prohibited Products
9. Enforcement

### **Site Inspections**

Inspections of restaurants and other FOG producing sites enable Western to determine which sites may be problematic to the area's collection system. Western's Pretreatment Program Services Team is responsible for inspecting all restaurants and similar facilities within Western's service area minimally once per year, with many being inspected two to four times per year. The increase in inspection frequency is determined by the history of the site, the type of restaurant or food service facility, complaint history, sewer line buildup and/or stoppage history, or SSO history.

Photos in Appendix 7 show a completely plugged grease interceptor chamber and the resulting wastewater SSO. Failure to maintain grease interceptors results in this level of grease buildup and subsequent wastewater SSO. The site inspections are used to ensure proper maintenance and the results of the inspections are maintained in a computer relational database that has the ability to provide the inspector with an inspection and enforcement history for the site.

The site inspection will also evaluate the grease interceptor for performance and integrity. The District uses the "25% Rule" when determining the efficiency of grease removal by an interceptor. The 25% Rule simply states that when the operational fluid capacity has been reduced by more than 25%, the interceptor is no longer capable of removing FOG at its designed rate and therefore needs to be serviced. The performance will also be affected by missing elbows or mid-wall tees or influent extensions that are too long. The integrity of the interceptor is often affected by anaerobic conditions that generate sulfide gas that causes corrosion of concrete surfaces. Once the concrete begins to corrode, plumbing connections are compromised and, in some cases, the structural integrity of the interceptor is in question.

Western's Pretreatment Program Services Team also works closely with the County of Riverside's Department of Environmental Health to share information gained during restaurant inspections. Western's Pretreatment Program Services inspectors have some knowledge of what constitutes Health and Safety Code restaurant violations and recognize the important connection between FOG prevention BMPs and Health and Safety. When these violations are observed, a phone call is placed to the Health Department to have the area inspector respond and take appropriate enforcement actions. The Pretreatment Program Team then follows up to assure BMPs are being followed.

### **Public Education and Outreach**

Western uses the Pretreatment Program Services inspectors as the principle education and outreach method to contact the restaurant community, food service industry and residents. Occasionally the Pretreatment Program Services inspectors will participate in outreach efforts sponsored by other agencies. During an inspection of a restaurant or food service facility, the inspector will use the opportunity to inform and educate the owner or manager about the various laws and regulations that affect their business. The inspectors also provide useful information related to interceptor design, maintenance, and businesses that can assist the restaurants and food service facilities in maintaining pretreatment equipment. Subject areas would include:

- Product usage and substitution
- Good housekeeping practices
- Grease interceptor evaluation
- Wastewater Ordinance legal authority citations, and
- The District's permit requirements

### **Best Management Practices**

Western has adopted Best Management Practices related to the operations and maintenance of grease interceptors and in the housekeeping operations associated with food preparation and cleanup at restaurants and other food service facilities.

BMPs are not just guidelines, they are enforceable when a User fails to implement one or more of the listed BMPs. The adopted BMPs are as follows:

## **BMPs – Food Preparation Area**

Introduction: Fats, Oils and Grease (FOG) are food by-products that can severely damage a facility's drain line system as well as the sanitary sewer system. FOG collects and eventually hardens on the inside of the sewer pipes; preventing water from flowing and causing blockages.

Blockages in the sewer cause Sanitary Sewer Overflows (SSOs), dumping raw sewage into streets, lakes, streams, homes and businesses.

The best way to prevent blockages is to keep the FOG out of the sewer system. Below is a list of Best Management Practices that will help to prolong the life of building sewer systems and public sanitary sewer systems and reduce the inconvenience and cost of line blockages.

- **Don't** put grease or fryer oil down any sink or floor drain.
- **Don't** dispose of food or food scraps in sinks.
- **Don't** pour bleach directly down ANY drain. Bleach when use improperly dewater grease, making it as hard as concrete.
- **Don't** take out sink strainers or drain covers. Empty scraps into trash, not down the drain.
- **Don't** use cleaning chemicals improperly. Follow the instructions on the label, for your safety as well as the safety of the environment.
- **Scrape** all solid food waste into the garbage.
- **Encourage** staff to be conservative about use of FOG in food preparation and serving.
- **Use** paper towels to soak up oil and grease under fryer baskets and to wipe down work areas. Dispose of the paper towels into the trash.
- **Eliminate** the use of garbage disposals.
- **Check** all sinks and floor drains for strainers and covers and ensure they are in place and in good working order.
- **Be Knowledgeable** about the maintenance schedule, location and operation of the FOG control interceptor.
- **Ensure** that used fryer oil is placed in the appropriate recycling container.
- **Maintain** the required grease removal interceptor to assure it will operate effectively at all times.

## **BMPs – FOG Interceptor Maintenance**

Introduction: As listed above, Best Management Practices for controlling fats, oils, and grease include maintenance of any required grease removal devices. The approved device for removing FOG within Western's service area is a gravity interceptor (referred to hereafter sometimes as an interceptor, grease interceptor or FOG interceptor). For the interceptor to work effectively, it must be cleaned periodically to ensure adequate detention time (the time water remains in the unit before passing through to the sewer). Ensuring adequate detention time is accomplished by proper "sizing" when the interceptor is first installed and secondly by maintaining the interceptor so that 75% or more of the design capacity is available when in use. Western inspects grease interceptors on an annual basis (more often if necessary) and evaluates the interceptor's condition and the ability to remove FOG.

The User or owner of the FOG interceptor is required to:

- **Contract** with an approved grease waste hauler to completely clean all chambers of the interceptor including the sample box (if one exists).
- **Establish** a routine interceptor cleaning schedule and adjust the schedule based upon condition of interceptor after routine service. A minimum of 75% available capacity must be maintained at all times.
- **Observe** the interceptor cleaning periodically to ensure the waste hauler is doing a thorough job. This also provides the User an opportunity to view the internal plumbing to ensure it is in good working order and complies with Western's standards.
- **Don't** use any emulsify agents in the interceptor that inhibits the interceptor from separating floatables and solids from the final effluent.
- **Keep Records** on-site for a minimum of three years that document all interceptor service events for Western's inspector to review.

## **Grease Interceptor Retro Fits**

One of the main compliance tools used by the Pretreatment Program Services team for restaurant and other food preparation facilities is the requirement to install a grease interceptor. For new construction and tenant improvement projects, this action is accomplished through Western's plan check process. Occupancy permits cannot be obtained if the User has not agreed to the Pretreatment requirements of the project. Western does not allow grease traps within a building to substitute for the function of the outside interceptor. The only FOG control device allowed within Western's service area is the grease interceptor installed outside the building.

If an existing restaurant or food preparation facility has been proven to be the cause of a sewer line blockage and/or SSO and does not have a grease interceptor, then the User is required to install an appropriately sized grease interceptor within 90 days. If the existing restaurant or food preparation facility has a grease interceptor but the device is poorly maintained or is inadequate to treat the type and volume of wastewater from the facility,

then the User will be required to replace the existing grease interceptor with a one that is adequate for the intended application.

Any restaurant or food preparation facility found responsible for the sanitary sewer system blockage and/or SSO, will be assessed all costs of cleanup and/or repairs necessary to remove the blockage and/or SSO. The costs associated to the cleanup and/or repairs will be tracked by opening a Work Order and charging all associated costs to the Work Order.

### **Prohibited Products**

Western's Wastewater Ordinance prohibits the use of any chemical or material that will emulsify, suspend or dissolve oil and grease and the use of any microbiological product to metabolize FOG. The Pretreatment Program Services inspectors are constantly looking for these products during every restaurant/food preparation facility inspection. When a prohibited product is discovered being used, the user is ordered to immediately stop the use of the product and have the product removed from the premises. Failure to comply with these administrative orders may result in additional enforcement actions, including civil and/or criminal actions.

### **Enforcement**

The discharge of wastewater by a User that causes a sewer line obstruction or blockage is prohibited by the Federal Clean Water Act, 40 CFR 403.5(b)(3) and Western's Wastewater Ordinance. Western's Pretreatment Program Services staff is empowered by Western's State and Federal approved programs to take enforcement actions against any user that causes a sewer line obstruction and/or SSO.

### **State Order Section 7(b) FOG Disposal Plan, Schedule and Facilities**

*The Enrollee's FOG Control Plan shall include a plan and schedule for the disposal of FOG generated within the service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a Sanitary Sewer System service area.*

FOG disposal information is provided in a stand-alone document entitled Western's Fats, Oils and Grease (FOG) Program and within this SSMP in Appendix 7. Several grease waste haulers are identified in Appendix 7 in compliance with the State Order to identify FOG disposal facilities. A FOG producing customer would most likely call for FOG pumping and disposal as opposed to looking for a receiving facility; therefore, the listing of haulers is most appropriate. This list is made available to any potential FOG discharger by the inspector during scheduled and unscheduled visits. FOG generators are to provide a plan and schedule for pumping as a part of their Best Management Practices for FOG control.

## **State Order Section 7(c) Legal Authority to Prohibit FOG Discharges**

*The Enrollee's FOG Control Plan shall include the legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG.*

Legal authority is outlined in Western's Fats, Oils and Grease (FOG) Program made a part of Appendix 7, published as a stand-alone document with the same name and found in Western's Wastewater Ordinance. Western's Wastewater Ordinance provides Western the legal authority to prohibit FOG discharges to the system in compliance with the State Order. The Wastewater Ordinance is sanctioned by State and Federal law and by General Pretreatment Regulations (40CFR403) as referenced in Section 3 herein. The Wastewater Ordinance is available on Western's website.

Prevention is the primary means to prevent blockages that can lead to SSOs. When FOG is detected in the Sanitary Sewer System it is cleaned, flushed and removed by the O&M Team. When excessive FOG is encountered, the O&M Team searches for the source and notifies the discharger to install a gravity interceptor, maintain its existing interceptor or upgrade it as called for in the Wastewater Ordinance.

Any Person, that Discharges wastewater containing fats, oils and grease or solids at excessive levels, as solely determined by Western, shall be required to install and maintain a gravity interceptor. Sanitary wastewater shall not be allowed to pass through the interceptor. The interceptor shall conform to Western standards and the operational fluid capacity shall be determined by Western.

If Western finds, either by engineering knowledge or by observation that an existing interceptor is incapable of adequately eliminating Prohibited Discharges, is structurally inadequate, or is undersized for the intended use, Western shall condemn such Interceptor and declare that the Interceptor does not meet Western requirements. The User shall be required to install, at the User's expense, an interceptor which is acceptable to Western.

## **State Order Section 7(d) Standard FOG Interceptor Requirements**

*The Enrollee's FOG Control Plan shall include requirements to install FOG removal devices (such as traps or interceptors) design standards for the removal devices, maintenance requirements, owner BMP requirements, record keeping requirements and reporting requirements.*

### **FOG Interceptor Requirement**

As described above, FOG Interceptor requirements are outlined in Western's Fats, Oils and Grease (FOG) Program made a part of Appendix 7, published as a stand-alone document, and found within Western's Wastewater Ordinance. Western's Wastewater Ordinance requires designated food processing facilities, including restaurants to install an approved

gravity interceptor. The interceptor is required to meet all installation and maintenance requirements of Western's Wastewater Ordinance. The interceptor shall be sized to be the larger of the design criteria specified in the current version of the Uniform Plumbing Code or the design criteria specified by Western. The interceptor shall contain a minimum of two chambers, with a manhole cover over each chamber and internal plumbing fixtures (tees), and shall include a sample box. The sample box is used to collect wastewater samples to verify the wastewater is in compliance with required discharge limits. Western's Wastewater Ordinance requires permitted food service facilities to meet specific discharge limits designed to protect the sewer collection and treatment system. An approved interceptor design has been included in Appendix 7.

The FOG Control Program includes a standard drawing for the Western approved interceptor that is in compliance with the State Order. The FOG Control Plan provides a list of approved interceptor manufacturers to provide customers with options for purchasing. Best Management Practices (BMPs) for maintaining interceptors are provided on Western's web site and copies are handed to dischargers with interceptors during site visits by Western inspectors. Inspections of FOG producing facilities are conducted routinely, and Western inspectors review the owner's written proof of cleaning frequency in the form of trucking company manifests. As stated in the Wastewater Ordinance, interceptor pumping and hauling manifest records shall be maintained continuously on site and retained for a minimum of 3 years by the User and made available to the District immediately upon request. Enforcement is initiated when records are not produced in accordance with the Wastewater Ordinance.

### **State Order Section 7(e) Authority and Staffing to Inspect FOG Facilities**

*The Enrollee's FOG Control Plan shall include Authority to inspect grease producing facilities, enforcement authorities, and whether Western has sufficient staff to inspect and enforce the FOG ordinance*

Inspection authority is provided in Western's Fats, Oils and Grease (FOG) Program made a part of Appendix 7, published as a stand-alone document and found within Western's Wastewater Ordinance. Western has the authority to inspect FOG producing sites as a result of State and Federal Codes and Western's Wastewater Ordinance. As stated in the Wastewater Ordinance, Western shall be granted permission to enter any properties from which Wastewaters are being, or are capable of being discharged into the Sanitary Sewer System for purposes of inspecting, observing, measuring, sampling, and testing the Discharge. Western shall have access at reasonable times to all parts of the Person's wastewater generating and disposal facilities for the purposes of inspection and sampling. Western shall have the right to set up on the Person's property such devices as are necessary to conduct sampling or metering operations. Where a Person has security measures in force, the Person shall make necessary arrangements so that authorized personnel from Western will be permitted to enter without delay for the purpose of performing their specific responsibilities.

Western has a competent staff including an experienced pretreatment services provider and therefore has the necessary staffing to inspect sites and enforce all regulations including those relating to FOG. Western staff members and its consultants are knowledgeable in all aspects of the Wastewater Ordinance.

**State Order Section 7(f) Identification of Sewers Subject to FOG**

*The Enrollee's FOG Control Plan shall include an identification of Sanitary Sewer System sections or pipe reaches subject to FOG blockages and establishment of a cleaning maintenance schedule for each section or pipe reach*

There are few potential FOG dischargers within Western's system. The O&M Team and pretreatment services consultant know the dischargers and the downstream reaches of sewer pipe that could be exposed to FOG build up. Lists showing potential FOG dischargers are included herein Appendix 7. Cleaning schedules are established based on inspection reports. At this time there are no sewer pipe reaches exposed to FOG build up.

**State Order Section 7(g) Source Control Measures for All Sources of FOG**

*The Enrollee's FOG Control Plan shall include Development and implementation of source control measures for all sources of FOG discharged to the Sanitary Sewer System for each section (pipe reach) identified in (f) above.*

Western's "Compliance Management System" included herein Appendix 7 describes Western's source control measures for all systems. Control measures are implemented with Western's Pretreatment Program and are applied as needed to remedy potential FOG issues as well as other discharge issues.

## **SECTION 8: SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN**

### **State Order D.13.viii**

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

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

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

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

*(d) Schedule: Western shall develop a schedule of completion dates for all portions of the CIP developed in 8(a) - 8(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14.*

### **State Order Section 8(a) Evaluation**

*The Enrollee's CIP plan shall include Evaluation: Actions needed to evaluate those portions of the system that are experiencing or contributing to a SSO discharge due to hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events.*

There are no hydraulic deficiencies within Western's existing Sanitary Sewer System. However, Western evaluates the hydraulic capability of its Sanitary Sewer System using computer simulation modeling and field verification. Western's Sewer Master Plan, dated January 2009, addresses two systems within Western's jurisdiction, the East System tributary to the Western WRF and the West System tributary to the WRCRWA treatment plant. The master plans contain the results of the computer models used to evaluate the existing systems with existing demands and then to hypothetically stress the existing systems with future demands to determine system vulnerability. Using results of existing and future analyses the master plan author prescribes needed facilities and estimated future capital improvement costs for entry into the annual CIP.

All future anticipated hydraulic deficiencies, if any, will most likely be the result of growth but can be anticipated and addressed prior to realization as a result of the computer modeling work and master planning reports that feed into the CIP.

Western requires new growth to pay for its own needed infrastructure without burdening existing customers; so, future computer simulated deficiencies will be eliminated as growth occurs as a result of Western's advance funding requirements and advance facility planning, design and construction. Mechanisms for adding new facilities include (1) the annual CIP for facilities constructed by Western using new connection fees and (2) development agreements

The exceptions to this are the sewers constructed during World War II to service the Air Force at March Field, now known as the March Air Reserve Base. Although there are no known hydraulic capacity issues there are age issues. Therefore, replacement sewers are considered for the area based on age, condition and maintenance frequency with each new annual CIP.

Western's system tributary to the IEBL consists generally of single pipe reaches known as laterals between the customer's discharge pipeline and the SAWPA meter structure upstream from the IEBL. Western's CRC Lateral is Western's most significant lateral and is approximately three miles in length. Since there is no need for computer analyses of any of the laterals staff members calculate capacity manually and track existing flow with its SCADA system and visually. A listing of Western's IEBL laterals has been included herein Appendix 8 with customer name, pipe size, maximum historical flow and hand calculations to determine approximate capacity.

### **State Order Section 8(b) Design Criteria**

*The Enrollee's CIP plan shall include Design Criteria: Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria.*

As reported within Section 5 of this SSMP, Western maintains the appropriate design criteria that generally exceed the requirements of the State Order. Design criteria are published on Western's website reported with the Sewer Master Plan and included herein Appendix 8. Design criteria are conservative and therefore more than adequate to support the needs of Western's Sanitary Sewer System.

### **State Order Section 8(c) Capacity Enhancement Measures**

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

Western's five year CIP establishes project priorities and provides short term and long-term CIP goals, together with the implementation schedule required by the State Order for major projects such as new facility construction to meet growth needs and replacement facility construction to remedy aging problems. Projects such as storm water and drainage inflow and infiltration (I/I) reduction are made a part of the maintenance budget each year as I/I sources are identified.

### **State Order Section 8(d) Schedule**

*The Enrollee's CIP plan shall include a Schedule: Western shall develop a schedule of completion dates for all portions of the CIP developed in 8(a) - 8(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14.*

As discussed above, Western provides annual updates to its CIP and exceeds the requirements of the State Order. Western's annual CIP budget is presented to its Board of Directors prior to the beginning of each fiscal year with cash flow planned five years into the future and funding distributed according to action such as planning, design and construction. The CIP therefore provides project identification, funding source and schedule as shown by example herein Appendix 8.

In accordance with Section D.14 of the State Order, the SSMP shall be updated every five (5) years, and must include any significant program changes. Re-certification by Western's Board of Directors is required in accordance with Section D.14 of the State Order when significant updates to the SSMP are made. To keep its files current, Western staff will take the five year SSMP update to Western's Board of Directors for re-certification whether or not there have been significant program changes. To complete the re-certification process every five years, Western staff will enter the date in the State Water Board Online SSO Database and mail the form to the State Water Board as described in Section D.14 of the State Order.

## **SECTION 9: MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS**

### **State Order D.13.ix**

*The Enrollee shall:*

- (a) maintain relevant information that can be used to establish and prioritize appropriate SSMP activities,*
- (b) monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP,*
- (c) assess the success of the preventative maintenance program,*
- (d) update program elements, as appropriate, based on monitoring or performance evaluations, and*
- (e) identify and illustrate SSO trends, including frequency, location and volume.*

### **State Order Section 9(a) Maintain Relevant Information**

*The Enrollee shall maintain relevant information that can be used to establish and prioritize appropriate SSMP activities.*

Western uses the SSMP as the central document in the array of numerous documents used to establish and prioritize SSMP activities. A key document used to form the culture of responsiveness is Western's Mission Statement. Documents describing Western's organization are used to identify individual responsibility and proper channels of communications. Legal documents such as Western's Wastewater Ordinance are used to enforce SSMP activities especially when SSMP activities can be significantly impacted by those outside Western's organization.

Mapping documents; maintenance records; annual budgets for rehabilitation and replacement of system components; five year Capital Improvement Programs; and, system master plans are used to prioritize SSMP activities and establish funding commitments in support of the SSMP.

Sanitary sewer system planning criteria; design requirements; construction standards and specifications; and, inspection protocols are means and methods to assure all new construction and rehabilitation are consistent with the SSMP intent.

**State Order Section 9(b) Monitor the Implementation of the SSMP**

*The Enrollee shall monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP.*

Western completed a thorough audit of its SSMP and staff's application of the SSMP to the administration and operation of the Sanitary Sewer System in 2011 and 2013. The primary objective of each SSMP Audit was to measure the effectiveness of each element of the SSMP. The measure of effectiveness was standardized with sufficiency, the measure of audit evidence obtained from independent research by the auditor, an outside third party registered engineer knowledgeable in wastewater administration and operation to fairly evaluate the evidence. The Audit Report was presented to Western's management, the general public and Western's Board of Directors for review and comment.

**State Order Section 9(c) Assess the Preventative Maintenance Program**

*The Enrollee shall assess the success of the preventative maintenance program.*

The auditor, during the 2011 and 2013 audits of the SSMP found significant evidence to support the findings that the preventative maintenance program is a success with its patrolling and monitoring; TV inspections; maintenance scheduling based on evaluation of problem areas; system of communication among O&M team and management; budgeting for rehabilitation needs; and prioritization of replacement projects with incorporation into the budget preparation cycle.

The preventative maintenance program is structured enough to support training and individual learning curves yet flexible enough to account for variable conditions. Finally, in the event of an SSO the maintenance team can respond quickly with the necessary material and equipment in part because it has assembled a SSO response trailer that contains first responder equipment and can be towed immediately to the site of the SSO.

Western will again assess the success of its preventative maintenance program in 2015 with its next scheduled audit. Updates to the SSMP will be made as needed and the entire SSMP will be re-certified as required every five (5) years, 2014, 2019, 2024, and etc.

**State Order Section 9(d) Update SSMP Program Elements**

*The Enrollee shall update program elements, as appropriate, based on monitoring or performance evaluations.*

Although there were no deficiencies found during the 2011 and 2013 audits, the auditor made numerous recommendations to improve SSMP program elements. The SSMP was therefore updated in 2013, one year earlier than prescribed by the State Order to optimize the SSMP as a communication and training document. Recommendations were again addressed after the 2013 audit and the SSMP was again updated in 2014 for the recertification process.

A major emphasis was placed on understanding the complexity of Western's Sanitary Sewer System. Western's systems are tributary to its own POTW, owned and operated by Western and to other POTW's owned and operated by others.

Western's Sanitary Sewer Systems convey wastewater to the following POTWs.

Western's own Water Recycling Facility (POTW) near Interstate 215 and Nandina Avenue serving March Air Reserve Base; and Woodcrest south of Van Buren Boulevard, Boulder Springs and Mission Ranch, generally known as Western's East Retail Area.

The Western Riverside County Regional Wastewater Authority's (POTW) near River Road and Archibald Street near Norco and Jurupa Community Services District serving Western's El Sobrante, Lake Hills and Victoria Grove areas generally known as Western's West Retail Area. And Western's Corona Diversion Structure and Pipeline, constructed to convey wastewater from Corona to WRCRWA.

SAWPA's Inland Empire Brine Line (IEBL) system serving Western laterals tributary to SAWPA's SARI system, the most notable being the CRC Lateral that conveys wastewater from the California Rehabilitation Center and Naval Surface Warfare Center in the City of Norco to IEBL Reach IVB. Wastewater travels through the SAWPA owned IEBL to a POTW owned and operated by the Orange County Sanitation District.

The Eastern Municipal Water District Perris (POTW) near Interstate 215 and Case Road in Perris serving Western pipelines in and around the Inland Port on the former March Air Force Base.

The Rancho California Water District, Santa Rosa Division (POTW) near Washington Avenue and Guava Street in Murrieta serving a portion of Western's Murrieta Division Sanitary Sewer System.

The Eastern Municipal Water District, Rancho California (POTW) near Alvarado Avenue and "A" Street in Temecula serving a portion of Western's Murrieta Division Sanitary Sewer System.

## **State Order Section 9(e) Identify SSO Trends**

*The Enrollee shall identify and illustrate SSO trends, including frequency, location and volume.*

Western's Sanitary Sewer System has no SSO trends and no deficiencies in system design, operation and/or maintenance. Western along with all owners of sanitary sewer systems is subject to SSO's caused by individuals external to their organization. One somewhat rare example is vandalism by individual's intent on causing significant damage to public and private property and infrastructure. These SSO's are beyond the ability of the public agency to completely eliminate even with thorough security measures.

The only ongoing trend is from incidents external to any Sanitary Sewer System operator. Contractors and individuals are required to call for pipeline location markings before they dig in accordance with State law. The notification system called DigAlert is for any digging and is defined in the California Government Code Section 4216-4216.9 as any excavation where excavation means any operation in which earth, rock, or other material in the ground is moved, removed, or otherwise displaced by means of tools, equipment, or explosives in any of the following ways: grading, trenching, digging, ditching, drilling, augering, tunneling, scraping, cable or pipe plowing and driving, or any other way.

DigAlert provides Western O&M team members with time and location of the proposed excavation work so that a Western inspector can be present to assure the safety of Western's sewer. But many contractors and individuals fail to abide by the law and proceed to dig without notifying DigAlert. Western operators are trained to spot illegal digging activity whenever they are in the field but cannot prevent all illegal work. Western's only recourse is to pursue each contractor and individual vigorously using the legal system if the contractor or individual causes a SSO as a result of digging without previously notifying DigAlert.

Western staff uses the enforcement elements of its Wastewater Ordinance to curtail illegal digging within its Sanitary Sewer System service area by pursuing each offender causing a SSO as a result of illegal digging. Hopefully, with aggressive enforcement action, contractors and individuals will know they need to notify DigAlert before any digging takes place within Western's service area.

## **In addition to State Order Section D.13.ix, Section G of the State Order defines General Monitoring and Reporting Requirements as follows:**

### **State Order G.1**

*The Enrollee shall furnish to the State or Regional Water Board, within a reasonable time, any information that the State or Regional Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Enrollee shall also furnish to the Executive Director of the State Water Board or Executive Officer of*

*the applicable Regional Water Board, upon request, copies of records required to be kept by this Order.*

### **State Order G.2**

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

### **State Order G.3**

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

### **State Order G.4**

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

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

### **SSO Categories are defined as follows:**

*Category 1 - All discharges of sewage resulting from a failure in the Enrollee's Sanitary Sewer System that:*

- A. Equal or exceed 1000 gallons, or*
- B. Result in a discharge to a drainage channel and/or surface water; or*
- C. Discharge to a storm drainpipe that was not fully captured and returned to the Sanitary Sewer System.*

*Category 2 - All other discharges of sewage resulting from a failure in the Enrollee's Sanitary Sewer System.*

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

Western herewith incorporates State Order D.13.ix, Section G and the monitoring and reporting program requirements of MRP No. 2006-0003, amended by MRP No. 2008-0002, and proposed amended requirements of MRP No. 2013-058 into its SSMP and has augmented the requirements with the informational recording and reporting information contained therein. The above referenced MRPs can be found in Appendix 9.

## **SECTION 10: SEWER SYSTEM MANAGEMENT PLAN PROGRAM AUDITS**

### **State Order D.13.x**

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

As a part of the SSMP, Western conducts periodic audits. At a minimum Western audits its SSMP every two years and prepares a report that is reviewed first by management then by the Board of Directors at a public meeting. As required by the State Order, Western's audits focus on evaluating the effectiveness of the SSMP, and Western's compliance with the SSMP requirements identified in the State Order including identification of any deficiencies in the SSMP and steps to correct them.

Western's SSMP was audited and audit results were filed in 2011 and 2013. The audits focused as required on evaluation of the effectiveness of the SSMP and Western staff's compliance with elements of SSMP. The measure of effectiveness was standardized with sufficiency, the measure of audit evidence obtained from independent research by the auditor, an outside third party registered engineer knowledgeable in wastewater administration and operation. The auditor found no deficiencies but made recommendations for clarification of various elements of the SSMP.

For reasons of security to protect public health and safety and to protect the Sanitary Sewer System from vandalism and/or terrorism, neither the SSMP nor the SSMP audit will be posted on Western's web site. The public can obtain information about Western's SSMP by attending its public meeting and/or by calling Western's offices at 951 571 7100.

## **SECTION 11: COMMUNICATION PROGRAM**

### **State Order D.13.xi**

*The Enrollee shall communicate with the public on the development, implementation and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented. The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's Sanitary Sewer System.*

### **State Order Section 11(a) Communicate with the Public**

*Communicate on a regular basis with the public on the development, implementation and performance of the SSMP.*

State Order requirements are complex with eleven major categories, over three-dozen subcategories and the numerous elements of its monitoring and reporting program. The Western SSMP has increased complexity with various Western systems tributary to different POTWs (Western WRF, Western Riverside County Regional Wastewater Authority, Orange County Sanitation District via SAWPA's IEBL system, Eastern Municipal Water District, and Rancho California Water District). Because of the complexity and numerous POTWs, Western staff members provide thorough notification when developing or updating the SSMP.

Prior to its adoption by the Board of Directors, the updated draft SSMP will be submitted to staff members for review and comment. The Board of Directors will publicly review the updated SSMP at a regularly scheduled meeting of the Board of Directors to receive comments from all interested parties prior to considering its adoption.

With the completion of each audit, Western staff members will provide a report on audit findings to Western's Board of Directors where the information will be shared with the general public and customers in attendance. At those meetings, feedback will be encouraged. Subsequent to the presentation to the Board of Directors, audit results will be shared with staff members responsible for various elements of the SSMP for information and education. For security of the Sanitary Sewer System, the SSMP Audit will not be posted on the Western website. As noted in the State Order the SSMP Audit is the mechanism to be used to measure SSMP performance and the best document for communicating performance. However, in the wrong hands the SSMP Audit and/or SSMP could provide information for use in vandalism and/or terrorism. The SSMP is however the best source of consolidated information for training Western staff members and Western approved contractors.

As mentioned above, the general public and customers will have an opportunity to provide input with the completion of each audit every two years and certification every five years. That represents three times every five years for customer and general public review and comment. Board meeting agendas are posted on Western's website to provide full disclosure to Western customers and interested members of the public that a review of an audit or updated SSMP will be performed. Western customers and the general public will be encouraged to comment any time during the life of the SSMP.

Western created a call center to enable the residents of Western's service area to call one phone number, to report any problem with anything related to Western's services. This number is frequently used to ask questions about the Sanitary Sewer System and to report problems. The report generated from the call center service request order has a chronological events feature that allows dispatch to accurately report the information. This system creates a direct communication link with Western customers.

Western staff prepares a new budget and CIP each year and presents recommendations to the Board of Directors at a public meeting. Western customers and the general public are invited to attend and comment.

**State Order Section 11(b) Communicate with Upstream/Downstream Agencies**  
*Create a plan of communication with agencies tributary to Western's system or satellite of Western's system.*

Tributary and satellite agencies to Western's Sanitary Sewer System include:

- City of Corona
- Home Gardens Sanitary District
- City of Norco
- Eastern Municipal Water District
- Rancho California Water District
- Santa Ana Watershed Project Authority
- Orange County Sanitation District
- Western Riverside County Regional Wastewater Authority

The City of Corona is tributary to Western's system via the Corona Diversion Structure and Pipeline. Western's facility conveys wastewater from Corona to the WRCRWA South Regional Lift Station for transport in WRCRWA's South Regional Force Main to the WRCRWA treatment plant. The Home Gardens Sanitary District and City of Norco are tributary to Western's gravity sewer (a.k.a. Western's Sterling/Sampson Trunk Sewer) that conveys wastewater from Western's West Sewer System to the WRCRWA South Regional Lift Station and WRCRWA's treatment plant.

The Eastern Municipal Water District sewer system along the east side of the March Air Reserve Base receives wastewater from Western facilities in and around the Inland Port, located just south of the MARB.

Both Rancho California Water District and Eastern Municipal Water District receive wastewater from Western's Murrieta Division Sanitary Sewer System.

Western staff members meet periodically with staff members from the other agencies and correspond via email routinely. Each has the other's cell phone numbers for day to day activities. And each time the SSMP is substantially updated the SSMP will be available for sharing with tributary and satellite agencies.