

ELEMENTS OF THE WASTEWATER COLLECTION SYSTEM MANAGEMENT PLAN

- I. Goals:** The goal of the Wastewater Collection System Management Plan is to prevent overflows and to provide a plan and schedule for implementation of measures to prevent overflows.
- II. Organization:** The Wastewater Collection System Management Plan must identify the following components:
- A. Administrative and maintenance positions responsible for implementing measures in the Wastewater Collection System Management Plan program, including lines of authority by organization chart or similar document; and
 - B. The chain of communication for reporting overflows, from receipt of a complaint or other information, including the person responsible for reporting overflows to the Regional Water Quality Control Board, Santa Barbara County Health Department, the City of Santa Barbara (City), and the State Office of Emergency Services (OES).
- III. Legal Authority:** The Wastewater Collection System Management Plan shall include legal authority, through sewer use ordinances, service agreements, or other legally binding procedures, to:
- A. Control infiltration and connections from inflow sources, including satellite systems;
 - B. Require that sewers and connections be properly designed and constructed;
 - C. Ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated service laterals);
 - D. Limit fats and greases and other debris that may cause blockages in the collection system; and
 - E. Implement the national pretreatment program authorities specified under 40 CFR 403.8(f)(1).
- IV. Measures and Activities:** In order to reduce overflows, the Wastewater Collection System Management Plan must address the elements listed below that are appropriate and applicable to the Permittee's system and identify the person or position in the organization responsible for each element.
- A. Provide adequate operation and maintenance of facilities and equipment.
 - B. Maintain an up-to-date map of the collection system showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and storm water conveyance facilities.
 - C. Maintain relevant information to establish and prioritize appropriate Wastewater Collection System Management Plan activities (such as the immediate elimination of dry weather overflows or overflows into sensitive waters, such as public drinking water supplies and their source waters, swimming beaches and waters where swimming occurs, shellfish growing areas, waters within Federal, State, or local parks, and water containing threatened or endangered species or their habitats), and identify and illustrate trends in overflows, such as frequency and volume.
 - D. Routine preventive operation and maintenance activities by staff and contractors; including a system for scheduling regular maintenance and cleaning of the collection system with more frequent cleaning and maintenance targeted at known problem areas as well as a tracking system for work orders.
 - E. Identify and prioritize structural deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. This shall include a rehabilitation plan including schedules for the entire system. As with the preventative maintenance program, sewer rehabilitation and replacement is

crucial for the prevention of spills. Among the provisions that should be specified in this section is the need to direct rehabilitation and replacement of sewer pipes which are at risk of collapse or prone to more frequent blockages due to pipe defects. The plan should also include regular visual and video inspection of sewer pipes and a system for assessing and ranking the condition of sewer pipes. Finally, the rehabilitation and replacement plan should include a financial plan that properly manages and protects the infrastructure assets. The actions outlined above shall be coordinated with the requirements for Infiltration/Inflow and Spill Prevention contained in Order No. R3-2004-0123, Section D.4.

- F. Provide training on a regular basis for staff in collection system operations, maintenance, and monitoring, and determine if contractors' staffs are appropriately trained.
- G. Provide equipment and replacement parts inventories, including identification of critical replacement parts.
- H. Establish an implementation plan and schedule for a public education outreach program that promotes proper disposal of grease and fats.
- I. Establish a plan for responding to overflows from private property that discharge to public right of ways and storm drains, to prevent discharges from overflows to surface waters and storm drains.
- J. Develop a plan and a schedule for providing an analysis of alternative methods of disposal for grease and fats, and an implementation plan and schedule for providing adequate disposal capacity for grease and fats generated within the wastewater collection system service area. For example, this plan may include an evaluation of the feasibility of using sludge digesters at the Treatment Facility for grease disposal and treatment, recycling, rendering, and other disposal alternatives.
- K. Describe fiscal resources necessary to ensure system operation, including fee structure, fiscal resources, actual and projected five-year budget expenses for staffing, operation, capital improvement projects, and reserves.
- L. Describe staffing available to ensure system operation (identifying individuals and titles) including developing, implementing, and revising the Wastewater Collection System Management Plan. Include an organizational chart, duties, and training frequency.

V. Design and Performance Provisions

- A. Develop and/or adopt design and construction standards and specifications for the installation of new sewer systems, pump stations, and other appurtenances; and for rehabilitation and repair of existing sewer systems; and
- B. Develop and/or adopt procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances, and for rehabilitation and repair projects.

VI. Monitoring, Measurement, and Plan Modifications

- A. Monitor the implementation and, where appropriate, measure the effectiveness of each element of the Wastewater Collection System Management Plan;
- B. Update program elements, as appropriate, based on monitoring or performance evaluations; and
- C. Modify the Wastewater Collection System Management Plan program, as appropriate, to keep it updated and accurate and available for audit at all times.

- VII. Overflow Emergency Response Plan:** The Permittee shall develop and implement an Overflow Emergency Response Plan that identifies measures to protect public health and the environment. At a minimum, this plan should provide for the following actions.
- A. Ensure proper notification procedures so that the primary responders are informed of all overflows in a timely manner (to the greatest extent possible).
 - B. Ensure that all overflows are appropriately responded to, including ensuring that reports of overflows are immediately dispatched to appropriate personnel for investigation and appropriate response.
 - C. Ensure immediate notification of health agencies and other impacted entities (e.g., water suppliers) of all overflows. The plan should provide for the reporting of overflows to the Regional Board, Santa Barbara County Health Department, the City, and the State Office of Emergency Services (OES) in accordance with each agency's policy. The Wastewater Collection System Management Plan should identify the public health agency and other officials who will receive immediate notification.
 - D. Ensure that appropriate staff and contractor personnel are aware of the plan, follow the plan, and are appropriately trained.
 - E. Provide emergency operations, such as traffic and crowd control, and other necessary emergency response.
 - F. Take all reasonable steps to contain sewage, prevent sewage discharges to surface waters, and minimize or correct any adverse impact on the environment resulting from the overflows, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.
 - G. Develop and implement a plan for the use of portable aerators where complete recovery of the wastewater collection system overflows is not practicable and where severe oxygen depletion in existing surface waters is expected.
 - H. Develop and implement a plan to respond in a timely manner to spills and other emergencies. Collection system staff should be able to respond to a sewage spill in less than an hour from the first call. The Permittee should be capable of meeting this response time day or night, every day of the week. The Permittee must own or have ready access to spill and emergency response equipment such as vacuum trucks, hydroflushers, pumps, temporary bypass hoses, and portable generators of adequate number and capacity to operate pump stations.
 - I. Describe offsite and onsite alarm systems, response times, and methods for detecting spills from the system,
- VIII. Source Control Program:** Prepare and implement a grease, fat, and oil source control program to reduce the amount of these substances discharged to the wastewater collection system. This plan shall include the legal authority to prohibit discharges to the system and identify measures to prevent overflows caused by fat, oil, and grease blockages of sewers. The elements of an effective grease control program may include requirements to install grease removal devices (such as traps or, preferably, interceptors), design standards for the removal devices, maintenance requirements, Best Management Practices (BMP) requirements, record keeping, and reporting requirements. An effective grease control program must also include authority to inspect grease producing facilities, enforcement authorities, and sufficient staff to inspect and enforce the grease ordinance. All source control and pretreatment activities shall be coordinated with the City.
- A. The grease control program shall identify sections of the wastewater collection system subject to grease blockages and establish a cleaning maintenance schedule for each section; and

- B. The program shall develop and implement source control measures, for all sources of grease and fats discharged to the wastewater collection system, for each section identified in (A) above.
- IX. System Evaluation and Capacity Assurance Plan:** Prepare and implement a capital improvement plan that will provide hydraulic capacity of key wastewater collection system elements under peak flow conditions. At a minimum, the plan must include:
- A. **System Evaluation** - Evaluate current capacity of the wastewater collection system including diversions of urban runoff to the collection system and those portions of the collection system which are experiencing or contributing to an overflow discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from overflows 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. **Capacity Enhancement Measures** - Establish a short- and long-term capital improvement program to address deficiencies including prioritization, alternatives analysis, schedules, diversions of urban runoff to the wastewater collection system during dry weather periods, and control of infiltration and inflow during both wet weather events and dry weather periods; and
- C. **Plan Updates** - At a minimum, the plan must be updated annually to describe any significant change in proposed actions and/or implementation schedules. The updates should include available information on the performance of measures that have been implemented.
- X. Annual Plan Updates:** As part of the Wastewater Collection System Management Plan, the Permittee shall conduct an internal audit, appropriate to the size of the system and the number of overflows, and submit a report of such audit (in conjunction with the annual report specified in the MRP), evaluating the Wastewater Collection System Management Plan and its compliance with this subsection, including its deficiencies and steps to correct them.
- XI. Time Schedule / Communications:** The Permittee should communicate at least annually with interested parties such as the Regional Board, the City, and the Santa Barbara County Health Department, on the implementation and performance of its Wastewater Collection System Management Plan. The communication system should allow interested parties to provide input to the Permittee as the program is developed and implemented. The Permittee shall develop and implement the Wastewater Collection System Management Plan according to the following schedule:

Wastewater Collection System Management Plan Time Schedule

Task	Completion Date
Legal Authority (Part III)	October 1, 2005
Measures and Activities (Part IV)	October 1, 2005
Overflow Emergency Response Plan (Part VII)	October 1, 2005
Design and Performance Provisions (Part V)	February 1, 2006
Capacity Evaluation (Part IX)	February 1, 2006
Source Control Program (Part VIII)	October 1, 2006
Final Wastewater Collection System Management Plan	October 1, 2006