

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

January 25, 2013

Mr. Stephen M. Zurn
Director of Public Works
City of Glendale
Public Works Department
633 E. Broadway, Room 209
Glendale, CA 91206

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Claim No. 7009 2820 0001 6537 8525

NOTICE OF VIOLATION – CITY OF GLENDALE, CITY OF GLENDALE COLLECTION SYSTEM – GLENDALE, CALIFORNIA (ORDER NOS. 2006-0003-DWQ AND 2008-0002-EXEC, WDID NO. 4SSO10388)

Dear Mr. Zurn:

The City of Glendale (“Enrollee”) operates a sanitary sewer collection system (“collection system”), regulated under waste discharge requirements contained in State Water Resources Control Board Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements (“WDR”) for Sanitary Sewer Systems (“SSS”), adopted by the State Water Resources Control Board on May 2, 2006.

The SSS WDR contains waste discharge requirements and a monitoring and reporting program for the operation of the Enrollee’s collection system referenced above. Wastewater conveyed by the Enrollee’s collection system is susceptible of containing high levels of suspended solids, pathogenic organisms, toxic pollutants, nutrients, oxygen-demanding organic compounds, oil and grease, and other pollutants which can degrade water quality and impact beneficial uses of water, and which are defined as wastes under the Porter-Cologne Water Quality Control Act (CWC § 13000 et seq.).

The SSS WDR prohibits any Sanitary Sewer Overflow (“SSO”) that results in a discharge of untreated or partially treated wastewater to waters of the United States. Furthermore, the Enrollee is required to report all SSOs to the statewide CIWQS SSO Online Database¹. As of January 16, 2013, the Enrollee has reported one hundred twenty-eight (128) SSOs in the CIWQS SSO Online Database to comply with the SSS WDR Amended Monitoring and Reporting Program (“Amended MRP”), since January 6, 2007 (see Exhibit 1 – attached).

On April 30, 2012, Jim Fischer, Water Resources Control Engineer with the State Water Resources Control Board’s Office of Enforcement, and Craig Blett, designated inspector, under contract to the USEPA, conducted an inspection of the Enrollee’s collection system to evaluate compliance with the SSS WDR. The inspection report is enclosed for your reference (see Exhibit 2 – attached).

¹ Available at:
https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main

You are hereby notified that the Enrollee is in violation of the Sanitary Sewer Collection System Order No. 2006-0003-DWQ and has violated California Water Code ("CWC") §§ 13350 and 13383 as follows:

A. Sanitary Sewer Overflows (SSOs):

1. SSS WDR Section C.1 prohibits any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States. The Enrollee violated this requirement by discharging untreated wastewater during sixty-eight (68) of the one hundred twenty-eight (128) SSOs reported as reaching surface waters and impacting waters of the State, as identified in Exhibit 1.
2. SSS WDR Section C.2 prohibits any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m). The Enrollee violated Section C.2 by discharging untreated wastewater during one hundred twenty-eight (128) SSOs reported since January 6, 2007, as identified in Exhibit 1.

B. SSO Reporting:

1. Section D.13.vi of the SSS WDR requires each Enrollee to develop and implement an overflow emergency response plan. The Enrollee incorporated the *SSO Procedures and Documentation Refresher* into the Overflow Emergency Response Plan as a field reference guide. According to the *SSO Procedures and Documentation Refresher*, field determinations on sewage volume lost to storm drain system are final. The Enrollee violated Section D.13.vi by failing to correctly implement the Overflow Emergency Response Plan during the April 16, 2012 SSO at 2800 Glenoaks Boulevard by changing field determinations on sewage volume lost to a storm drain three days after the spill event.
2. Amended MRP Attachment A under the heading Notification part 1 requires notifying the California Emergency Management Agency, formerly known as the State Office of Emergency Services or OES, the local health officer or directors of environmental health with jurisdiction over affected water bodies, and the appropriate Regional Water Quality Control Board within two (2) hours after becoming aware of the discharge of sewage that results in a discharge to a drainage channel or to a surface water. The Enrollee violated this requirement for at least three SSO by failing to notify the California Emergency Management Agency within two hours of a discharge to a drainage channel or to a surface water. The three specific SSO events identified during the inspection are as follows:
 - a. On January 12, 2011, a SSO occurred at 625 Cavanagh Road which resulted in a discharge of 2,350 gallons. The Enrollee was notified of the spill at 1:05 pm and the OES was notified at 3:24 pm.
 - b. On April 4, 2012, a SSO occurred at 637 Cannon Drive which resulted in the discharge of 100 gallons to a storm sewer. The Enrollee was notified of the spill at 8:40 am and the OES was notified at 11:15 am.
 - c. On November 7, 2011, a SSO occurred at 3324 Crail Way which resulted in the discharge of 224 gallons to a storm sewer. The Enrollee was notified of the spill at 8:04 am and the OES was notified at 10:41 am.

C. Operations and Maintenance:

Section E.1 of the SSS WDR requires a copy of the general WDRs and the certified Sewer System Management Plan ("SSMP") to be available to all sanitary sewer system operating and maintenance personnel at all times. During the inspection, when two sanitary sewer system operating and maintenance field crew members were asked whether they were familiar with the SSMP and its contents, they responded that they were not familiar with the SSMP or its contents. The SSMP includes a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. Therefore, the Enrollee violated Section E.1 by failing to make the SSMP available to its sanitary sewer system operating and maintenance personnel.

D. Program Self-Assessment:

Section D.13.x of the SSS WDR requires the Enrollee to conduct periodic internal SSMP Program audits evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements every two years. In addition, a report identifying deficiencies in the SSMP and steps taken to correct them must be prepared and kept on file, as identified in subsection D.13 of the SSS WDR. During the inspection, the Enrollee was unable to produce any evidence including a report to indicate a formal audit was conducted by its staff. Therefore, the Enrollee violated Section D.13.x for failure to conduct a formal audit of the SSMP and to have the required report on file.

E. General Areas of Concern:

Section D.8 of the SSS states that the Enrollee shall properly manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators including employees, contractors, or other agents are adequately trained and possess adequate knowledge, skills, and abilities. During the inspection, it was noted that:

- a. The volume of the sewage spill that reached surface water, drainage channel, or not recovered from the storm drain documented in the *SSO Field Worksheet* by the field crew at the 2800 Glenoaks Boulevard spill location on April 16, 2012 was revised three days after the spill event by a Wastewater Maintenance Supervisor. Field notes with major findings such as sewage spill volume discharging into the storm drain, drainage channel, or sewage spill that reached surface water are final and should not be revised after leaving the spill location.
- b. The Enrollee's uses a paper-based recording system for its daily collection system cleaning operations. Information from the paper-based records was not transferred to the City's Computerized Maintenance Management System. As a result, if cleaning history or Closed Circuit Television (CCTV) information were needed during an emergency, a physical search of the paper files must be conducted to locate the paper-based records and related CCTV video.
- c. A contractor hired by the Enrollee caused a backup onto a private property at a Sear's retail store located at 211 West California Avenue on March 26, 2012. No evidence was presented during the inspection which demonstrated the contractor was trained on the Overflow Emergency Response Plan or the Operation and Maintenance programs within the SSMP. In addition, the SSMP does not include procedures to ensure that contractor personnel are appropriately trained for an overflow emergency.

- d. The Overflow Emergency Response Plan does not include procedures to address crowd control or identify methods to ensure the public is protected from raw sewage overflows.

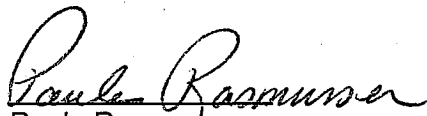
You are required to immediately:

1. Ensure full implementation of all required reporting requirements contained in the Amended Monitoring and Reporting Program;
2. Immediately implement corrective and preventative actions to bring the Enrollee's collection system into compliance with the Sanitary Sewer Collection System Order No. 2006-0003-DWQ;
3. Submit, by **February 25, 2013**, a report to the Regional Board detailing the corrective actions being taken to bring the Enrollee's collection system into compliance with the Sanitary Sewer Collection System Order No. 2006-0003-DWQ. This report should address the violations cited in this notice as well as the "Areas of Concern" listed in the attached inspection report. The report must be submitted as a pdf via email or a compact disc to Ms. Pansy Yuen, 320 W. 4th Street, Suite 200, Los Angeles, CA 90013-2343, pyuen@waterboards.ca.gov, (213) 620-6367.

Pursuant to CWC § 13350, subdivision (e), the Enrollee is subject to penalties of up to \$5,000 for each day in which a violation occurs or \$10 for each gallon of waste discharged, but not both. Pursuant to CWC § 13385, the Enrollee is subject to penalties of up to \$10,000 for each day in which a violation occurs plus \$10 multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons. The Regional Water Quality Control Board, Los Angeles Region ("Regional Board") may refer this matter to the Attorney General for judicial enforcement. The Regional Board reserves its right to take any enforcement actions authorized by law.

If you have any questions regarding this matter, please call Ms. Pansy Yuen at (213) 620-6637/ pyuen@waterboards.ca.gov or Mr. Hugh Marley at (213) 620-6375/ hmarley@waterboards.ca.gov.

Sincerely,



Paula Rasmussen
Assistant Executive Officer

Enclosures:

- Exhibit 1 – City of Glendale SSOs
- Exhibit 2 – April 30, 2012 Sanitary Sewer Collection System Inspection Report

cc: [via e-mail only]
Mr. Jim Fischer, State Water Resources Control Board, Office of Enforcement
Mr. Dan Hardgrove, City of Glendale Public Works Department Maintenance Services
[dhardgrove@ci.glendale.ca.us]

EXHIBIT 1:

City of Glendale - Glendale Collection System SSOs
(as reported on CIWQS as of 1/16/2013)

Event ID	SSO Category	Start Date and Time	SSO Address	City	Volume of SSO (gallons)*	Volume of SSO Recovered (gallons)*	Volume of SSO Reaching Surface Water (gallons)*
645268	Category 1	1/6/2007 11:56:00	1134 Chevy Chase Drive	Glendale	100	0	100
645450	Category 2	1/10/2007 10:45:00	1134 Chevy Chase Highway	Glendale	5	0	0
645861	Category 2	1/15/2007 19:45:00	315 Louise Street	Glendale	5	0	0
646135	Category 1	1/8/2007 8:00:00	1935 Caminito de la Estrella	Glendale	200	0	0
647671	Category 1	3/4/2007 11:00:00	100 Cedar Street	Glendale	3,000	500	2,500
648101	Category 1	3/17/2007 14:54:00	133 Chevy Chase Dr. Drive	Glendale	100	0	100
648286	Category 1	3/20/2007 7:00:00	300 Kenneth Road	Glendale	1,350	0	1,350
648297	Category 1	3/21/2007 11:00:00	3018 Paddington Road	Glendale	300	0	300
649857	Category 1	4/23/2007 12:05:00	337 Riverdale Avenue	Glendale	100	50	50
650199	Category 1	5/3/2007 1:00:00	1542 Vanderbilt Place	Glendale	900	0	900
650266	Category 1	5/6/2007 15:35:00	1122 Esmeralda Drive	Glendale	100	10	90
651025	Category 1	5/26/2007 11:15:00	3161 San Gabriel Avenue	Glendale	800	200	600
652336	Category 1	6/16/2007 12:50:00	556 Luton Drive	Glendale	200	100	100
652528	Category 1	6/19/2007 14:10:00	1101 Flower Street	Glendale	2,375	1,125	1,250
654493	Category 2	7/17/2007 9:25:00	1351 Columbia	Glendale	250	30	0
654966	Category 1	7/29/2007 11:45:00	3261 Buckingham Road	Glendale	600	100	500
655231	Category 1	8/2/2007 10:30:00	510 Cavanagh Road	Glendale	100	0	100
655670	Category 1	8/7/2007 9:15:00	1515 Ard Eevin Avenue	Glendale	10	0	10
655947	Category 1	8/16/2007 8:50:00	3524 Saint Elizabeth Road	Glendale	925	175	750
656090	Category 1	8/18/2007 12:30:00	367 Chevy Chase Drive	Glendale	150	0	150
656775	Category 1	9/2/2007 13:55:00	1621 Ina Drive	Glendale	500	100	400
656905	Category 1	8/14/2007 9:00:00	2935 St. Gregory Road	Glendale	300	150	150
657497	Category 2	9/12/2007 11:30:00	1859 Verdugo Loma Drive	Glendale	200	0	0
657700	Category 1	9/16/2007 12:00:00	2100 Broadview Drive	Glendale	4,500	500	4,000
704497	Category 1	10/1/2007 7:45:00	1355 Cordova Drive	Glendale	200	10	190
706607	Category 1	10/24/2007 8:00:00	508 Isabel Street	Glendale	200	0	200
706615	Category 1	10/25/2007 10:05:00	1600 Royal Boulevard	Glendale	900	0	900
707456	Category 2	4/18/2007 6:15:00	140 North Isabel Street	Glendale	999	0	0
707617	Category 1	11/10/2007 9:30:00	2301 Hollister	Glendale	1,750	125	1,625
707816	Category 1	11/15/2007 21:00:00	500 Colorado Street	Glendale	12,000	2,000	10,000
707827	Category 1	11/16/2007 7:30:00	1312 Oberlin Drive	Glendale	750	0	750
707986	Category 1	6/24/2007 13:30:00	220 Glendale Avenue	Glendale	7,500	7,500	0
708113	Category 2	11/23/2007 16:35:00	1721 Marion Drive	Glendale	100	0	0
708941	Category 1	12/10/2007 20:30:00	641 Canyon Drive	Glendale	700	200	500
709646	Category 1	12/16/2007 11:00:00	3041 Chevy Chase Drive	Glendale	508	0	508
709901	Category 2	5/25/2007 11:00:00	1736 Alamo Drive	Glendale	10	0	0
709903	Category 2	5/25/2007 14:58:00	1550 Melwood Drive	Glendale	50	0	0
709938	Category 2	5/31/2007 9:00:00	500 Arch Place	Glendale	10	0	0
709941	Category 2	9/10/2007 18:00:00	1329 Elm Avenue	Glendale	100	0	0
710149	Category 2	7/20/2007 8:23:00	1440 Mellwood Drive	Glendale	30	0	0
710453	Category 2	12/24/2007 15:00:00	445 Mt. Carmel Drive	Glendale	200	200	0
710984	Category 1	1/8/2008 15:15:00	1117 Allen Avenue	Glendale	750	0	750
711523	Category 2	1/19/2008 16:00:00	3677 Glenwood Road	Glendale	100	0	0
711998	Category 1	1/27/2008 11:00:00	4527 San Fernando Road	Glendale	450	0	450
712181	Category 1	1/30/2008 9:40:00	1600 Ina Drive	Glendale	45	0	45
712309	Category 2	2/1/2008 13:02:00	1708 Las Flores Drive	Glendale	5	0	0

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City of Glendale - Glendale Collection System SSOs
(as reported on CIWQS as of 1/16/2013)

Event ID	SSO Category	Start Date and Time	SSO Address	City	Volume of SSO (gallons)*	Volume of SSO Recovered (gallons)*	Volume of SSO Reaching Surface Water (gallons)*
712327	Category 2	1/29/2008 21:30:00	544 Olmstead Drive	Glendale	244	0	0
713802	Category 1	2/23/2008 11:30:00	1631 Moreno Drive	Glendale	340	0	340
714280	Category 1	2/26/2008 10:18:00	1900 Sherer Lane	Glendale	85	50	35
714741	Category 1	3/9/2008 11:30:00	1300 Irving Avenue	Glendale	600	10	590
715489	Category 2	3/24/2008 22:19:00	1600 Del Valle Avenue	Glendale	50	0	0
715698	Category 1	4/1/2008 20:30:00	16 17 Ridgeway Drive	Glendale	450	100	350
715843	Category 2	4/3/2008 6:00:00	1554 Idlewood Road	Glendale	20	0	0
716067	Category 2	4/2/2008 16:00:00	Nesmuth Road	Glendale	100	0	0
716092	Category 1	4/9/2008 21:00:00	2738 Rustic Lane	Glendale	100	20	80
716959	Category 1	5/4/2008 18:15:00	3041 Chevy Chase Drive	Glendale	1,000	0	1,000
717012	Category 1	5/5/2008 9:45:00	2229 Glenoaks Boulevard	Glendale	94	0	94
717024	Category 1	5/5/2008 8:00:00	3200 Verdugo Road	Glendale	110	30	80
717193	Category 2	4/28/2008 9:00:00	Roads End	Glendale	50	0	0
718402	Category 1	5/29/2008 11:10:00	1420 Central Avenue	Glendale	11,748	11,748	0
718994	Category 2	6/2/2008 9:00:00	1871 Oakmont	Glendale	5	0	0
719941	Category 1	6/17/2008 16:45:00	300 Verdugo Road	Glendale	7,700	2,500	5,200
719951	Category 1	6/18/2008 8:44:00	Kenneth Road	Glendale	1,250	675	575
724196	Category 1	8/2/2008 9:25:00	400 Kempton Road	Glendale	175	0	175
725877	Category 2	8/30/2008 10:46:00	1300-1400 Allen Avenue	Glendale	15	0	0
727685	Category 2	10/8/2008 11:00:00	3500 Clifton Place	Glendale	20	20	0
727744	Category 2	10/8/2008 8:40:00	2815 Chevy Chase Drive Drive	Glendale	20	15	0
728963	Category 2	10/26/2008 12:50:00	3161 San Gabriel Avenue	Glendale	240	240	0
730094	Category 1	11/29/2008 17:00:00	1240 Crescent Drive	Glendale	75	0	75
730310	Category 2	12/3/2008 15:00:00	614 Glenendale Terrace	Glendale	14	14	0
730362	Category 1	12/8/2008 15:50:00	350 Arden Avenue	Glendale	5	0	5
730597	Category 1	12/14/2008 18:30:00	3524 St. Elizabeth Road	Glendale	2,500	1,413	1,087
731067	Category 2	12/20/2008 12:00:00	721 Glen Avenue	Glendale	800	0	0
733929	Category 2	1/10/2009 23:00:00	2900 Graceland Way	Glendale	20	0	0
734105	Category 1	2/24/2009 7:15:00	2100 Broadview Drive	Glendale	1,700	522	1,178
734413	Category 1	2/25/2009 16:00:00	4240 Lauderdale Avenue	Glendale	225	32	193
734550	Category 1	3/3/2009 8:34:00	408 Spencer Street	Glendale	1,100	775	325
738087	Category 2	5/21/2009 11:40:00	535 Broadway Boulevard	Glendale	100	0	0
744271	Category 2	8/30/2009 21:15:00	819 Harrington Road	Glendale	20	0	0
744460	Category 1	9/5/2009 9:00:00	1400 Valane Drive	Glendale	385	10	375
746309	Category 2	10/20/2009 13:00:00	1800 Wabasso Way	Glendale	3	0	0
746588	Category 2	10/29/2009 13:30:00	1100 Elm Avenue	Glendale	15	15	0
746633	Category 2	10/29/2008 12:08:00	1521 Grandview Avenue	Glendale	15	0	0
746796	Category 2	11/11/2009 11:00:00	2301 Hollister Terrace	Glendale	3	0	0
746848	Category 1	11/15/2009 9:30:00	821 Verdugo Road A	Glendale	3,064	1,234	0
746869	Category 1	11/17/2009 11:10:00	1019 Dolorita Avenue	Glendale	175	0	0
749404	Category 1	2/14/2010 21:00:00	3128 Dragonfly Street	Glendale	500	0	0
749412	Category 1	2/15/2010 11:00:00	1700 Bel Aire Drive	Glendale	300	40	0
749983	Category 1	2/28/2010 17:50:00	3767 Lockerbie Lane	Glendale	405	10	0
750607	Category 1	3/12/2010 13:00:00	130 Chevy Chase Drive	Glendale	1,500	1,300	0
753416	Category 1	6/11/2010 9:15:00	1368 Bruce Avenue	Glendale	150	145	0
755037	Category 1	7/14/2010 20:20:00	1700 Cielito Drive	Glendale	900	225	0

EXHIBIT 1:

City of Glendale - Glendale Collection System SSOs
(as reported on CIWQS as of 1/16/2013)

Event ID	SSO Category	Start Date and Time	SSO Address	City	Volume of SSO (gallons)*	Volume of SSO Recovered (gallons)*	Volume of SSO Reaching Surface Water (gallons)*
755356	Category 2	7/20/2010 8:50:00	700 Luton Drive	Glendale	242	242	0
755922	Category 1	8/8/2010 8:50:00	1601 Ridgeview Drive	Glendale	2,625	0	0
756876	Category 1	9/15/2010 6:30:00	1900 Glenoaks Blvd. Boulevard	Glendale	180	15	165
757150	Category 1	9/22/2010 18:20:00	Canada Boulevard	Glendale	350	175	175
758198	Category 1	10/25/2010 11:09:00	1111 Air Way	Glendale	315	75	240
758428	Category 2	10/31/2010 11:45:00	3456 St. Elizabeth Road	Glendale	640	0	0
759953	Category 1	12/25/2010 9:45:00	1800 Niodrara Drive	Glendale	175	120	55
761203	Category 1	1/12/2011 10:00:00	625 Cavanagh Road	Glendale	2,350	390	1,960
761406	Category 1	1/15/2011 14:55:00	632 Alexander Street	Glendale	265	190	75
761990	Category 1	1/25/2011 7:10:00	605 Kenneth Road	Glendale	680	300	380
762503	Category 2	1/25/2011 1:50:00	1415 Edinburgh Lane	Glendale	70	70	0
763102	Category 2	2/12/2011 10:00:00	3575 Chevy Chase Drive	Glendale	200	195	0
764430	Category 2	3/12/2011 12:15:00	3100 Glencrest Drive	Glendale	25	25	0
764439	Category 1	3/15/2011 7:15:00	1014 Linden Avenue	Glendale	11,700	1,900	7,100
768202	Category 1	7/6/2011 7:55:00	1059 Raymond Avenue	Glendale	1,500	1,250	250
770280	Category 2	8/20/2011 13:41:00	1110 Catalina Drive	Glendale	5	0	0
771475	Category 2	9/23/2011 9:15:00	408 Spencer Street	Glendale	10	0	0
771478	Category 1	9/25/2011 18:45:00	1400 Mountain Street	Glendale	1,000	300	700
771534	Category 2	9/14/2011 10:15:00	1639 Moreno Drive	Glendale	375	0	0
772309	Category 1	10/20/2011 17:50:00	1602 Golf Club Drive	Glendale	500	250	250
772892	Category 1	11/7/2011 8:04:00	3324 Crail Way	Glendale	225	1	224
774438	Category 2	11/6/2011 10:35:00	750 Kenneth Road	Glendale	415	415	0
774568	Category 1	12/21/2011 8:03:00	1200 Columbus Avenue	Glendale	990	182	808
775248	Category 1	12/31/2011 14:00:00	Pacific Avenue	Glendale	600	225	0
775945	Category 2	1/10/2012 12:45:00	1400 Del Monte Drive	Glendale	23	23	0
779422	Category 2	3/26/2012 12:30:00	200 California Avenue	Glendale	75	75	0
779527	Category 1	4/4/2012 8:40:00	637 Canyon Drive	Glendale	155	50	0
780220	Category 1	4/16/2012 9:25:00	2800 Glenoaks Boulevard	Glendale	135	40	0
780908	Category 2	4/25/2012 20:30:00	3100 Dragonfly Street	Glendale	5	5	0
781684	Category 1	5/24/2012 8:31:00	2840 Glenoaks Boulevard	Glendale	5,300	4,620	680
782597	Category 1	6/23/2012 13:00:00	100 Colorado Boulevard	Glendale	900	450	450
786096	Category 1	9/9/2012 10:00:00	3354 Thelma Street	La Crescen	375	125	200
787328	Category 1	10/16/2012 13:25:00	536 Grove Place	Glendale	73	15	58
787835	Category 1	10/31/2012 9:43:00	1100 Allen Avenue	Glendale	2,450	2,000	450
788775	Category 1	12/1/2012 9:30:00	275 Kenneth Road	Glendale	250	225	25
789153	Category 1	12/15/2012 14:30	647 Canyon Drive	Glendale	120	58	52
				TOTALS	118,115	48,224	55,372

April 30, 2012

Sanitary Sewer Collection System Inspection Report

Exhibit 2

EPA Region IX and California Water Resources Control Board

Sanitary Sewer Collection System Inspection Report

Collection System Name and Location City of Glendale Collection System 663 E. Broadway Room 209 Glendale, CA 91206		Entry Date 4/30/2012 Entry Time 7:00 AM	Permit Effective Date 5/2/2006
Order Number 2006-0003-DWQ & 2008-0002-EXEC		WDID Number 4SSO10388	Permit Expiration Date
Name(s) & Title(s) of On-Site Representative(s) Maurice Oillataguerre (Sr. Env. Prgm Specialist) John Hicks (Wastewater Maintenance Supervisor)		Contact Information Phone: (818) 937-8219 E-mail: moillataguerre@ci.glendale.ca.us	Notified of Inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Name, Title & Address of Responsible Official Dan Hardgrove (P.W. Maint. Services Administrator) 541 W. Chevy Chase Drive Glendale, CA 91204		Contact Information Phone: (818) 548-3950 E-mail: dhardgrove@ci.glendale.ca.us	Official Contacted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Inspector(s) Primary: Craig Blett (PG Environmental, LLC) Other(s): Jim Fisher (State Water Resources Control Board)			Presented Credentials? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Weather Conditions at the Time of the Inspection: Sunny; no recent precipitation		Receiving WWTP Information Name: Hyperion Wastewater Treatment Plant and Glendale Water Reclamation Plant NPDES No.: CA0109991 and CA0053953, respectively	
Overview of Areas Evaluated During Inspection <i>S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated</i>			
SSO History: U		Operations & Maintenance: M	
SSO Reporting & Documentation: U		Overflow Emergency Response Plan: M	
Legal Authority: S		FOG Control Program: S	
Sewer System Mapping: S		Program Self-Assessment: U	
Prepared By: Craig Blett (PG Environmental, LLC) on 5/8/2012 Reviewed By: Max Kuker (PG Environmental, LLC) on 6/26/2012			

Narrative

On April 30, 2012 a USEPA contractor inspected the Glendale City Collection System in Glendale, CA. Discharges from the City's collection system are regulated by the Sanitary Sewer System Waste Discharge Requirements (SSSWDR) 2006-0003-DWQ and its accompanying Amended Monitoring Plan Order No. 2008-0002-EXEC (hereafter Amended MRP). The primary on-site representative was Maurice Oillataguerre (Senior Environmental Program Specialist) and the additional on-site representative was John Hicks (Wastewater Maintenance Supervisor).

The primary goals of this inspection were to gather necessary information for compliance and enforcement purposes as stated in the Compliance and Enforcement Plan for the Sanitary Sewer Overflow Reduction Program posted on the Sanitary Sewer Overflow Reduction Program website and to evaluate the effectiveness of controls used by the City to prevent discharges as prohibited by the Clean Water Act (CWA). The inspection encompassed onsite inspections and subsequent review of pertinent sewer system information, including review of Sewer System Management Plans (SSMPs); maintenance, operations, and management activities; Sewer Use Ordinance; financial information; and other areas needed to verify the Discharger's compliance with all requirements of the SSSWDR, including efforts to eliminate, reduce and/or mitigate sanitary sewer overflows (SSOs).

The State Water Resources Control Board (State Water Board), Office of Enforcement and participating Regional Water Quality Control Board (Los Angeles Water Board) are conducting Compliance Inspections of sewer collection systems. The inspections are being conducted as part of the combined Water Boards' enforcement response to verify compliance with "Waste Discharge Requirements for Sanitary Sewer Systems," Water Quality Order No. 2006-0003-DWQ, and its incorporated amended Monitoring and Reporting Program (hereafter referred to as SSSWDR (the acronym for the term Sanitary Sewer Systems Waste Discharge Requirements in Water Board vernacular), and amended MRP).

The collection system is regulated under the SSSWDR (2006-0003-DWQ) and associated amended MRP (2008-0002-EXEC), which requires all public agencies that own or operate a sanitary sewer system comprised of more than one mile of pipes that convey wastewater to a publicly owned treatment facility to apply to the State Water Board for coverage under the SSSWDR. Applicable public agencies were required to file a Notice of Intent (NOI) for each individual sanitary sewer collection system owned or operated by the public city by November 2, 2006. State Water Board records show that the City of Glendale filed an NOI with the State Water Board to enroll "Glendale City - Glendale City Collection System," which was assigned WDID #4SSO10388 by the State Water Board, effective on April 7, 2006.

No prior inspection of the collection system has been conducted by either the State Water Board, or the Los Angeles Water Board.

System Overview

The City of Glendale (City) owns and operates the Glendale City Collection System, a medium-sized sanitary sewer collection system that serves the entire area of the City of Glendale, Los Angeles County, California. Sewage is conveyed by the collection system to the City of Los Angeles and is ultimately treated at the Hyperion Wastewater Treatment Plant which is owned and operated by the City of Los Angeles or the Glendale Water Reclamation Plant which is jointly owned by the City of Glendale and the City of Los Angeles.

According to the City's "Collection System Questionnaire" required by the SSSWDR, last updated by the City on November 10, 2011, and confirmed during the inspection, the collection system serves an estimated population of approximately 207,000 residents, and contains 360 miles of gravity sewers, no force mains (pressurized sewers), and 33,000 lateral sewer service connections. The City does not have ownership or maintenance responsibilities of the laterals other than the points of connection to the main sewers. The City's collection system has reportedly experienced historic and periodic SSOs, some of which are violations of the SSSWDR, where untreated or partially treated sewage reached surface waters, based on information certified by City in the California Integrated Water Quality System (CIWQS).

Inspection Timeline

Time	Inspection Activity/Task
7:00 AM	Introductions and Opening Statements at Opening Conference
7:30 AM	Collection System Overview at the Administration Building
10:30 AM	Maintenance Shop Records Review
1:30 PM	Field Activities
4:00 PM	Additional Records Review at the Maintenance Shop
4:30 PM	Closing Meeting at the Maintenance Shop
6:10 PM	Exited the Inspection

Major Findings

SSO History

1. State Water Board Order 2006-0003-DWQ, Part C.1 stated that the discharge of untreated or partially treated wastewater to waters of the United States is prohibited. Based on a review of the SSO Public Report generated from the CIWQS online reporting system, on five occasions between April 30, 2011 and April 30, 2012 untreated wastewater was discharged by the City to waters of the United States. Refer to Exhibit 1 for the CIWQS Violations Report which gives details of the SSO discharges. The City reported discharges to surface waters of 250 gallons on July 6, 2011; 700 gallons on September 25, 2011; 250 gallons on October 20, 2011; 224 gallons on November 7, 2011; and 808 gallons on December 21, 2011.

2. State Water Board Order 2006-0003-DWQ, Part C.2 prohibits the discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m). Based on a review of the SSO Public Report generated from the CIWQS online reporting system, on ten occasions between April 30, 2011 and April 30, 2012 untreated wastewater was discharged by the City from the collection system creating a nuisance such as to be potentially injurious to health and to be offensive to the senses. Refer to Exhibit 1 for the CIWQS Violations Report which gives details of the SSO discharges.

SSO Reporting & Documentation

1. State Water Board Order 2006-0003-DWQ, Part D.13.vi requires that each Enrollee shall develop and implement an overflow emergency response plan. The City developed an overflow emergency response plan and prepared field forms and standard procedures to implement that plan. According to interviews with the primary on-site representative and field crews, the plan and procedures were not followed in documenting an SSO that occurred on April 16, 2012 when there was a blockage in a sewer main at 2800 Glenoaks Blvd. The responding field crew originally reported that the spill volume was 135 gallons and that no wastewater was captured and returned to the sewer. The field crew also reported that the wastewater entered a storm

sewer catch basin and was not recovered. The inspectors and the City representatives made a site visit to the location of the spill. The responding field crew was met at the spill location and interviewed regarding the details of the spill and their subsequent response. One field crew member, Mr. Dave Ulrich, stated that the spilled wastewater had entered the storm sewer catch basin confirming the information in his original field report made at the time of the spill. Based on a review of the field report, the field report was revised by the Wastewater Maintenance Supervisor three days after the spill had occurred. The report was changed from the field crew's on site determination of wastewater entering a catch basin to a conclusion that no wastewater entered the catch basin and furthermore that 41 gallons of wastewater was captured and returned to the sewer (refer to Exhibit 2). According to the Wastewater Maintenance Supervisor, the revisions were made by him. The Wastewater Maintenance Supervisor based his revisions on assumptions of flow path, rate and distance of flow. He documented the revised calculation in an undated and unsigned sketch (refer to Exhibit 3). According to the Wastewater Maintenance Supervisor, Mr. Ulrich had 'changed his story' when questioned by the inspector. Note that training information in a field crew guide collected during the inspection indicates that the response team (field crew) shall determine if any sewage is lost to a storm drain and the field decisions on lost some/lost none are final (refer to Exhibit 4).

2. State Water Board Order 2006-0003-DWQ Amended MRP, Attachment A (Notification) requires that for any discharges of wastewater that results in a discharge to a drainage channel or a surface water, the Discharger shall, as soon as possible but not later than two (2) hours after becoming aware of the discharge, notify the State Office of Emergency Services. On at least three occasions, the City failed to report a discharge to a drainage channel or a surface water within two (2) hours. The specific SSO events are presented in the following paragraphs;

On January 12, 2011 an SSO occurred at 625 Cavanagh Road which resulted in a discharge of 2,350 gallons. The City was notified of the spill at 1:05 PM and the OES was notified at 3:24 PM (refer to Exhibit 5, Page 1 of 3).

On April 4, 2012 an SSO occurred at 637 Cannon Drive which resulted in the discharge of 100 gallons to a storm sewer. The discharge to the storm sewer was not captured and returned to the sanitary sewer system. The City was notified of the spill at 8:40 AM and the OES was notified at 11:15 AM (refer to Exhibit 5, Page 2 of 3).

On November 7, 2011 an SSO occurred at 3324 Crail Way which resulted in the discharge of 224 gallons to a storm sewer. The discharge to the storm sewer was not captured and returned to the sanitary sewer system. The City was notified of the spill at 8:04 AM and the OES was notified at 10:41 AM (refer to Exhibit 5, Page 3 of 3).

The primary on-site representative stated that containing the spill and recovering the wastewater is the City's highest priority and therefore at times the notification is delayed if it interferes with spill response.

Operations & Maintenance

1. State Water Board Order 2006-0003-DWQ Part E.1 requires a copy of the general WDRs and the certified SSMP shall be available to sanitary sewer system operating and maintenance personnel at all times. Two field crew members were asked whether they were familiar with the SSMP and its contents. They responded that they were not familiar with the SSMP or its contents.

Program Self-Assessment

1. State Water Board Order 2006-0003-DWQ, Part D.13.x requires the Enrollee to conduct periodic internal SSMP Program audits every two years and requires that a report must be prepared and kept on file. The City did not conduct a formal audit of the SSMP to evaluate the effectiveness of the SSMP and did not have the required report on file. The primary on-site representative stated that an informal audit had been conducted; however, no record was made of the audit.

Areas of Concern

Operation and Maintenance

1. Collection system cleaning operations use a paper-based recording system with field crews recording each day's cleaning activities and results on a single sheet of paper that is then placed in a paper file system. Information from the paper-based records is not transferred to the City's Computerized Maintenance Management System (CMMS) and there is no automated retrieval or searchable system for reviewing cleaning history and no method to allow for a cross reference to CCTV information. If cleaning history is needed, a physical search of the paper files must be conducted.

SSO Emergency Response Plan

1. A contractor working for the City on a City owned sewer line caused a backup onto private property at 211 W. California (Sears retail store) on March 26, 2012. There was no discussion of training contractors in the SSMP and there was no evidence presented that demonstrated this contractor had been trained on SSO emergency response or O&M programs.
2. The SSO Emergency Response Plan was reviewed as a component of this inspection. The SSO Emergency Response Plan does not address crowd control or have information to ensure the public is protected from the spilled wastewater.

Attachments:

Photo Log
Exhibit Log

COLLECTION SYSTEM INFORMATION:

INSPECTED ITEM	RESPONSE
1. Sanitary Sewer System Category	Municipal
2. Population served by agency's sanitary sewer system <i>The population estimate was provided on a Pre-inspection Questionnaire and was based on the 2010 Census. The City reported a population of 207,000 residents in the 2011 Annual Collection System Questionnaire in CIWQS.</i>	191,719
3. Approximate size of the service area served by the sewer collection system	28 square miles
4. Miles of sanitary sewer in the collection system a. Gravity b. Force main	362 0
5. Number of pump stations in the collection system	1
6. Average monthly household user fee for sewage collection only	\$17
7. Budget for operation and maintenance sanitary sewer system facilities a. Last fiscal year b. Current fiscal year c. Following fiscal year <i>Budget information is based on information collected during the inspection.</i>	\$2,432,871 \$3,362,927 \$3,036,514
8. Number of staff (FTEs) that conduct sewer operation and maintenance tasks	16
9. Collection system maintenance equipment owned by the agency a. Combination vactor truck(s) (hydro flush/vacuum) b. Mechanical rodder(s) c. Closed-circuit television (CCTV) inspection trucks d. Standalone CCTV camera units	3 1 1 N
10. Method for assigning and tracking work orders for sewer system maintenance <i>The City uses a computerized maintenance management system (CMMS) for assigning work orders. Cleaning operations use a paper-based recording system with field crews recording each day's cleaning activities and results on a single sheet of paper that is then placed in a paper file system. Information from the paper-based records are not transferred to the CMMS system.</i>	CMMS and Paper-Based Systems
11. Budget for capital expenditures for sanitary sewer system facilities a. Last fiscal year b. Current fiscal year c. Following fiscal year <i>The rapid escalation of capital expenditures from last year to the current year was not discussed during the inspection.</i>	\$607,994 \$18,100,400 \$26,865,000

COLLECTION SYSTEM INFORMATION:

INSPECTED ITEM	RESPONSE
12. Portion of sewer service laterals that agency is responsible for	Connection at Main
13. Number of sewer service lateral connections <i>The City reported 33,000 sewer service laterals in the 2011 Annual Collection System Questionnaire in CIWQS.</i>	33,750
14. Number of wastewater treatment plants (WWTPs) that ultimately receive wastewater from this collection system: WWTP Name(s): <u>Hyperion Wastewater Treatment Plant and Glendale Water Reclamation Plant</u> WDID No(s): <u>N/A</u>	2
15. Does this collection system discharge into any other collection systems? Collection System Name: <u>City of Los Angeles</u> WDID No: <u>N/A</u>	Yes
16. Do any upstream collection systems greater than 25,000 gallons/day (gpd) discharge into this collection system? Collection System Name: <u>City of Los Angeles</u> WDID No: <u>N/A</u> <i>According to the Pre-inspection Questionnaire, 16 million gallons per day (mgd) are discharged from the City of Los Angeles to the City's collection system.</i>	Yes
17. Percentage of flow in the collection system from the following sources: a. Residential b. Commercial c. Industrial d. Institutional	80% 10% 10% 0
18. Has the agency developed standard and emergency operating procedures for each asset (e.g., pump stations, WWTP process units, and collection system force mains) in the event of a power and/or pumping failure?	Yes
19. Are pump stations in the collection system connected to a supervisory control and data acquisition (SCADA) system or an auto dialer system to detect pump failures or high/low wet well levels? If yes, how many? <i>The single pump station is connected to an auto dialer system.</i>	Yes
20. Other:	
Notes:	

SSO HISTORY:

OVERALL RATING: U

INSPECTED ITEM	EVALUATION
<p>1. Number of SSOs that occurred during the past twelve months that:</p> <ul style="list-style-type: none"> a. Discharged to waters of the United States: <u>0</u> b. Entered a storm sewer system and discharged to waters of the United States: <u>5</u> c. Entered a storm sewer system but were contained prior to discharge to waters of the United States: <u>0</u> d. Discharged to private residences/buildings: <u>2</u> <p>1b. According to the CIWQS Violation Report, during the last twelve months, the City reported five SSO's where wastewater discharged to a storm sewer system and discharged to waters of the United States. Spill reports were confirmed by reviewing spill records that included the SSO Field Worksheets and Stoppage Follow-up and Documentation Check Sheets. Select SSO files for the period of January 2011 through April 2012 were reviewed. Refer to the 'Major Findings - SSO History' section of this report for details.</p> <p>1d. A subset of SSO records from the previous twelve months were reviewed during the inspection. Two discharges to buildings were identified based on the review.</p>	
<p>2. Does the agency hold post-SSO briefings with collections staff, management and others involved, to evaluate root cause of SSOs and document service changes necessary to prevent the reoccurrence of the SSO and be prepared in responding to SSOs in the future?</p>	Yes
<p>3. Provide a description of steps taken by the agency to mitigate largest (by volume) SSO event which occurred during previous 12 months :</p> <p>A 990 gallon spill occurred at 1200 N. Columbus Avenue on December 21, 2011. The spill was due to a blockage caused by grease and roots. The City investigated the source of the spill by CCTVing the line segment and observed roots and grease in the line. The City has a regular preventative maintenance program to clean sewer lines of roots and grease.</p>	S
<p>4. Other:</p>	N
<p>Notes: This section was rated "unsatisfactory" due to checklist item 1b.</p>	

SSO REPORTING & DOCUMENTATION:

OVERALL RATING: U

INSPECTED ITEM	EVAL
1. Has the Enrollee obtained an SSO Database account by registering through the California Integrated Water Quality System (CIWQS) [Part G.3]?	Yes
2. Has the Enrollee updated the "Collection System Questionnaire" in the SSO Database at least every 12 months [Part G.3]? a. When was the questionnaire last updated? <u>November 2011</u>	S
3. Have all Category 1 SSOs been reported in the Online SSO Database within 3 days of the Enrollee becoming aware of the SSO [Part A.4]?	S
4. Have all Category 2 SSOs been reported in the Online SSO Database within 30 days of the Enrollee becoming aware of the SSO [Part A.5]?	S
5. What is the Enrollee's policy on reporting private lateral sewage discharges in the Online SSO Database [Part A.6]? <i>The City does not report private lateral sewage discharges in CIWQS.</i>	N
6. Do field forms/processes used by the Enrollee to document the occurrence of SSOs ensure that all information identified in Part A.9, A.10, and A.11 is recorded and able to be reported in the Online SSO Database? <i>On April 16, 2012 there was a blockage in a sewer main at 2800 Glenoaks Boulevard According to the field form, the City recovered 41 gallons of spilled wastewater. According to CIWQS, the City reported that 40 gallons of spilled wastewater was recovered.</i>	M
7. Has the Enrollee maintained individual SSO records for a period of at least five years from the date of the SSO occurrences [Part B.1]?	S
8. Does the agency require crews to take photographs of SSOs? <i>The City does not require field crews to take photographs.</i>	S
9. Does the SSMP 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 [Part D.13(ii)(c)]?	S
10. Provide description of program/process used by the Enrollee for receiving, documenting, addressing, and tracking sanitary sewer complaints: <i>The City has developed a process to document and track sanitary sewer complaints. On April 16, 2012, there was a blockage in a sewer main at 2800 Glenoaks Boulevard Based on a review of the SSO event file, the SOPs and training information prepared by the City were not followed. Refer to the 'Major Findings - SSO Reporting and Documentation' section of this report for details</i>	U
11. Other: <i>SSO Reporting to OES</i> <i>At least three Category 1 SSOs which reached a surface water were not reported within two hours as required by the Amended MRP. Refer to the 'Major Findings - SSO Reporting and Documentation' section of this report for details.</i>	U
Notes: <i>This section was rated "unsatisfactory" due to checklist items 10. and 11.</i>	

LEGAL AUTHORITY:

OVERALL RATING: S

INSPECTED ITEM	EVAL
1. Does the SSMP identify the name of the responsible or authorized representative [Part D.13 (ii)(a)]? a. If so, is the current information up-to-date? <u>Yes</u>	S
2. Does the SSMP identify the names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program [Part D.13(ii)(b)]? a. If so, is the current information up-to-date? <u>Yes</u>	S
3. Has the Enrollee adopted a sewer use ordinance? a. If so, when was it adopted and last updated? <u>A detailed review of of the sewer use ordinance was not conducted.</u>	S
4. Has the Enrollee established the necessary legal authority to [Part D.13(iii)]: a. Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.) [Part D.13(iii)(a)] b. Require that sewers and connections be properly designed and constructed [Part D.13(iii)(b)] c. Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency [Part D.13(iii)(c)] d. Limit the discharge of fats, oils, and grease and other debris that may cause blockages [Part D.13(iii)(d)] e. Enforce any violation of its sewer ordinances [Part D.13(iii)(e)]	S S S S S
5. Other:	N
Notes: <i>This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.</i>	

SEWER SYSTEM MAPPING:

OVERALL RATING: S

INSPECTED ITEM	EVAL
1. Has the Enrollee developed and maintained an up-to-date <u>map</u> of the sanitary sewer system [Part D.13 (iv)(a)]? a. When was the map last updated? <u>The map is continuously updated as revisions are required.</u> b. Does the Enrollee have a program or policy for maintaining its sewer system map up-to-date? If so, provide brief description. <u>Corrections are made based on information collected during normal O&M activities.</u>	S
2. Does the map identify all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities [Part D.13 (iv)(a)]?	S
3. What format is the map maintained in? Provide brief description. <i>The map is maintained in electronic format.</i>	S
4. Other:	N
Notes: <i>This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.</i>	

OPERATIONS & MAINTENANCE:

OVERALL RATING: M

INSPECTED ITEM	EVAL
<p>1. Does the SSMP 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 [Part D.13 (iv)(b)]? If so, how often is it adjusted to reflect the changing needs of the system?</p> <p><i>The O&M program described in the SSMP is a dynamic program designed to meet the changing needs of the collection system.</i></p>	S
<p>2. Does the Enrollee have a system to document scheduled and conducted activities, such as work orders [Part D.13 (iv)(b)]? If so, provide brief description of system.</p> <p><i>The City uses a computerized work order system called CASS WORKS. CASS WORKS is a proprietary program used to produce and track work orders. Cleaning activities are documented on daily cleaning sheets and stored in paper format. The method limits access to historic cleaning data. Refer to the 'Areas of Concern - Operations and Maintenance' section of this report for details.</i></p>	M
<p>3. Has the Enrollee established performance standards or sewer system cleaning/inspection goals? If so, provide brief description.</p> <p><i>According to the primary onsite representative, the City has established a goal of cleaning the entire sewer system on a sixteen month cycle. The sewer system is divided into twelve zones and cleaning in each zone is completed before moving to the next zone.</i></p>	S
<p>4. Sewer cleaning and inspection activities:</p> <ul style="list-style-type: none"> a. Total gravity sewer collection system cleaning production (hydro flushing, mechanical and hand rodding) over the <u>past</u> 12 months (miles): <i>Approximately 250 miles</i> b. Total gravity sewer collection system cleaning production scheduled (hydro flushing, mechanical and hand rodding) for the <u>next</u> 12 months (miles): <i>Approximately 250 miles</i> c. Total CCTV Inspection production in the <u>past</u> 12 months (miles): <i>Approximately 50 miles</i> d. Total CCTV inspection production scheduled for the <u>next</u> 12 months (miles): <i>Approximately 50 miles</i> <p><i>Note: The Enrollee's collection system comprises 360 miles of sewer.</i></p>	S
<p>5. Does the agency retain contract service(s) for sewer collection system maintenance, operations, and/or management?</p> <ul style="list-style-type: none"> a. If collection system cleaning activities are performed by outside contractors, does the agency require video (CCTV) inspections before and after cleaning to measure the effectiveness of these activities? <i>Not reviewed</i> 	S
<p>6. Does the agency inspect pipes with CCTV video after all SSO(s)?</p> <p><i>Based on the subset of records reviewed during the inspection, it appears that the City inspects pipes with CCTV after all SSOs.</i></p>	S
<p>7. Has the Enrollee identified focused problem areas ("SSO hot spots") located throughout the collection system?</p> <ul style="list-style-type: none"> 1. Total number of identified hotspots: <i>There are approximately 150 hot spots which are cleaned on a monthly cycle.</i> 	S

OPERATIONS & MAINTENANCE:

OVERALL RATING: **M**

INSPECTED ITEM	EVAL
<p>8. Does the SSMP include a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency [Part D.13 (iv)(c)]?</p>	S
<p>9. Does the agency have a program in place to identify areas with inflow & infiltration (I/I)?</p> <p>a. Total number of sewer miles identified by this program: <u>N/A</u></p> <p>b. Are there plans in place for eliminating the identified I/I issues? <u>N/A</u></p> <p>The primary on-site representative stated that Infiltration and Inflow (I/I) was not a major concern and that the system has capacity to handle I/I. I/I was investigated during the preparation of a 1998 Sewer System Master Plan. The Master Plan was updated in 2007.</p>	S
<p>10. Does the SSMP include information for providing training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained [Part D.13 (iv)(d)]?</p> <p>The SSMP includes information for providing training on the contents of the SSMP; however, interviews with some field crew members identified a general lack of knowledge regarding the contents of the SSMP. Refer to the 'Major Findings - Operations and Maintenance' section of this report for details.</p>	U
<p>11. Does the SSMP include 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 [Part D.13 (v)(a)]?</p>	S
<p>12. Does the SSMP include procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects [Part D.13 (v)(b)]?</p> <p>The SSMP does not include procedures and standards for inspection and testing of new sewer systems as required. The SSMP references the City's Sanitary Sewer Manual and Standards and the Standard Specifications for Public Works Construction (Greenbook), Public Works Standards, Inc., 2006 but does not make reference to whether the required procedures and standards for inspection and testing of new sewer systems are present in those documents or whether the procedures must be followed, if they do exist. The referenced standards were not reviewed as a component of this inspection.</p>	M
<p>13. Has the Enrollee prepared and implemented 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 events [Part D.13(viii)]?</p> <p>a. When was the CIP last updated? <u>2007</u></p> <p>The City has developed a 10 year CIP for the 2007-2017 period.</p>	S
<p>14. Other:</p>	N
<p>Notes:</p> <p>This section was rated "marginal" due to checklist items 2. and 12., and because the inspector did not believe that checklist item 10. was significant enough to down grade rate the overall rating to "unsatisfactory".</p>	

OVERFLOW EMERGENCY RESPONSE PLAN:

OVERALL RATING: M

INSPECTED ITEM	EVAL
1. Has the Enrollee developed and implemented an Overflow Emergency Response Plan that identifies measures to protect public health and the environment [Part D.13 (vi)]?	S
2. Does the agency provide initial and recurrent training to appropriate staff [including outside contractor(s)] regarding your agency's SSO Emergency Response Plan and O&M programs? a. What percentage of applicable staff was trained during the past 12 months? <i>A contractor working for the City on a City owned sewer line caused a backup onto private property at 211 W. California (Sears retail store) on March 26, 2012. There was no discussion of training contractors in the SSMP and there was no evidence presented that demonstrated this contractor had been trained on SSO emergency response or O&M programs. Refer to the 'Areas of Concern - Overflow Emergency Response Plan' section of this report for details.</i>	M N
3. For contracted sewer services, do the contracting specifications contain specific language requiring initial and recurrent training of contractor staff regarding your agency's SSO Emergency Response Plan and O&M programs?	N
4. Does the Overflow Emergency Response Plan include the following [Part D.13(vi)]: a. Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner [Part D.13(vi)(a)] b. Program to ensure an appropriate response to all overflows [Part D.13(vi)(b)] c. Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP [Part D.13(vi)(c)] d. Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained [Part D.13(vi)(d)] e. Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities [Part D.13(vi)(e)] 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 [Part D.13(vi)(f)] <i>4d. This checklist item was accounted for in checklist item 2. above.</i> <i>4e. The SSO Emergency Response Plan does not address crowd control or have information to ensure the public is protected from the spilled wastewater. Refer to the 'Areas of Concern - Overflow Emergency Response Plan' section of this report for details.</i>	S S S S M M S
5. Other:	N
Notes: <i>This section was rated "marginal" due to checklist items 2. and 4e.</i>	

FOG CONTROL PROGRAM:

OVERALL RATING: S

INSPECTED ITEM	EVAL
1. Has the Enrollee evaluated its service area to determine whether a FOG control program is needed [Part D.13(vii)]: a. If so, what was the result of the evaluation? <i>The City inspects restaurant grease interceptors, conducts regular system cleaning, occasionally uses degreasing agents and cleans known FOG hot spots.</i>	S
2. If the Enrollee has determined that a FOG control program is necessary, has the Enrollee developed and implemented the FOG control program? a. What sources of FOG does the program address? <u>Commercial</u> b. Approximately how many commercial food service establishments (FSEs) are subject to FOG control? <u>Not reviewed</u>	S
3. Does the FOG Control Program Plan include the following [Part D.13(vii)]: b. An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG [Part D.13(vii)(a)] c. A plan and schedule for the disposal of FOG generated within the sanitary sewer system 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 [Part D.13(vii)(b)] d. The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG [Part D.13(vii)(c)] e. Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements [Part D.13(vii)(d)] f. Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance [Part D.13(vii)(e)] g. An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section [Part D.13(vii)(f)] h. Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above [Part D.13(vii)(f)]	S S S S S S S
4. Other:	N
Notes: <i>This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.</i>	

PROGRAM SELF-ASSESSMENT:

OVERALL RATING: U

INSPECTED ITEM	EVAL
<p>1. Has the Enrollee assessed the success of the preventive maintenance program [Part D.13 (ix)(c)]? a. If so, provide a brief description of assessment results. <i>The City conducts a periodic review of SSO events and makes adjustments to the preventative maintenance program. Additionally, the City uses CCTV to determine the effectiveness of the sewer cleaning program.</i></p>	S
<p>2. Has the Enrollee updated SSMP program elements, as appropriate, based on monitoring or performance evaluations [Part D.13 (ix)(d)]? a. When was the SSMP last updated? <u>The SSO Field Worksheet was last updated December 15, 2011.</u> <i>Certain aspects of the FOG control program, including grease interceptor inspections, were switched from the fire department to the public works department. At the time of the inspection, the SSMP had not been updated to reflect this change in responsibility.</i> <i>The FOG inspections are conducted under the Industrial Waste Pretreatment Program.</i></p>	M
<p>3. Has the Enrollee identified and illustrated SSO trends, including frequency, location, and volume [Part D.13 (ix)(e)]? a. If so, provide a brief description of identified trends. <i>The City is tracking SSO frequency and spill capture percentages.</i></p>	S
<p>4. Has the Enrollee conducted periodic internal audits of the SSMP [Part D.13(x)]? <i>There was no evidence that a formal audit of the SSMP had been conducted. Refer to the 'Major Findings - Program Self-Assessment' section of this report for details</i></p>	U
<p>5. Have the audits occurred at least every two years? a. When was the last audit conducted? <u>N/A</u> b. Provide a brief description of major changes made to the program as a result of the last audit. <u>N/A</u> <i>This checklist item is accounted for in checklist item 4. above.</i></p>	U
<p>6. Other:</p>	N
<p>Notes: <i>This section was rated "unsatisfactory" due to checklist items 4. and 5.</i></p>	

City of Glendale Collection System (2006-0003-DWQ & 2008-0002-EXEC) Exhibit Log
 Inspected by: Craig Blett (PG Environmental, LLC) and Jim Fisher (State Water Board)

SSO Public Report - Detail Page

Here is the detail page of your SSO public report search for the selected region, responsible agency, or collection system. These results correspond to the following search criteria:

SEARCH CRITERIA: REGION SEARCH

- Agency (Glendale)
- Region (4)
- End Date (4/30/2012)
- Start Date (4/30/2011)
- End Date (4/30/2012)

The table below presents important details for all sewage discharge locations, as submitted through individual SSO reports, which meet the search criteria selected. If data is not shown for a particular field, it means the Enterbas did not provide the information and was not required to do so. To view the entire SSO report for a specific sewage discharge location, please select the corresponding EVENT ID.

DRILLDOWN HISTORY:

REGION: 4

EVENT ID	Reason	Responsible Agency	Collection System	SSO Category	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	SSO Failure Point	WQID
719500	4	Glendale City	Glendale City CS	Category 2	Glendale	5	5	0	Main	4SSO10388
719520	4	Glendale City	Glendale City CS	Category 1	Glendale	135	40	0	Main	4SSO10388
719527	4	Glendale City	Glendale City CS	Category 1	Glendale	135	50	0	Lower Lateral	4SSO10388
719522	4	Glendale City	Glendale City CS	Category 2	Glendale	75	75	0	Main	4SSO10388
719545	4	Glendale City	Glendale City CS	Category 2	Glendale	23	23	0	Main	4SSO10388
719548	4	Glendale City	Glendale City CS	Category 1	Glendale	600	225	0	Mainhole at their main line	4SSO10388
714598	4	Glendale City	Glendale City CS	Category 1	Glendale	890	182	608	Main	4SSO10388
714528	4	Glendale City	Glendale City CS	Category 2	Glendale	415	415	0	Main	4SSO10388
712682	4	Glendale City	Glendale City CS	Category 1	Glendale	225	1	224	Main	4SSO10388
712309	4	Glendale City	Glendale City CS	Category 1	Glendale	500	250	250	Main	4SSO10388
711531	4	Glendale City	Glendale City CS	Category 2	Glendale	375	0	0	Main	4SSO10388
714128	4	Glendale City	Glendale City CS	Category 1	Glendale	1,000	300	700	Main	4SSO10388
714125	4	Glendale City	Glendale City CS	Category 2	Glendale	10	0	0	Main	4SSO10388
710280	4	Glendale City	Glendale City CS	Category 2	Glendale	5	0	0	Main	4SSO10388
718202	4	Glendale City	Glendale City CS	Category 1	Glendale	1,500	1,250	250	Main	4SSO10388

The current report was generated with data as of Monday, May 14, 2012

Exhibit 1: CIWQS Violation Report for Category 1 and Category 2 SSOs (April 30, 2011 through April 30, 2012).

City of Glendale Collection System (2006-0003-DWQ & 2008-0002-EXEC) Exhibit Log
 Inspected by: Craig Blett (PG Environmental, LLC) and Jim Fisher (State Water Board)

SSO Field Worksheet (page2)

Spill response activities (Check all that apply):

- Cleaned-up (mitigated effects of spill)
- Contained all or a portion of spill
- Inspected sewer using CCTV to determine cause
- Restored flow
- Returned all or a portion of the spill to the sanitary sewer system
- Other (Specify) _____

Answer the following three questions about this event:

#1. Is the spill volume greater than or equal to 1000 gals? Yes/No No

#2. Did the spill discharge to a drainage channel or surface water? Yes/No No

#3. Did the spill discharge to a storm drain pipe that was not fully Captured and returned to the sanitary sewer system? Yes/No No

Did you answer "yes" to any of the above questions? Yes/no No

If Yes SSO is _____ Category 1

If No SSO is _____ Category 2 (circle one) 2

Final spill destination (Check all that apply):

- Building or structure
- Other paved surface
- Storm drain
- Street/curb and gutter
- Surface water
- Unpaved surface
- Other (Specify) _____

Estimated total spill volume: (Attach Calculations)	A. <u>135</u> gallons
Estimated volume of spill recovered:	B. <u>0</u> gallons
Estimated volume of spill that reached surface water, drainage channel, or <u>not</u> recovered from storm drain:	C. <u>135</u> gallons

Did you answer yes to either question #2 or #3 above? Yes/No No

If Yes call OES within 2 hrs of time agency notified or discovered spill. 4/16

OES Phone # 1-800-852-7550

OES Control # 12-2255 Time OES notified: 4/16/12 10:45
 MM/DD/YY Time 24 hr

Call supervisor to review circumstances and reporting. _____
 Supervisor called: _____ MM/DD/YY Time 24 hr

Special circumstances/Comments: 4/16/12 - J. FISHER ADJUSTED VOLUME NUMBERS w/ OES STAFF w/ CHECKER 10:05 AM

Attach This Worksheet to The Stoppage Report Package for This Event

G:\1-WASTEWATER\2008\Crew Supervisors & WW Supt Shared\Training Program Materials\Sanitary Collection System and Maintenance\SSO_Field Worksheet.doc

Exhibit 2: SSO Field Worksheet for SSO on April 16, 2012 at 2800 Glenoaks Boulevard showing original field crew estimates of 135 gallons that reached surface water (or was not recovered) and zero gallons recovered. Values were changed on April 19, 2012 by the Wastewater Maintenance Supervisor to state that 41 gallons were recovered an zero gallons reached surface water.

City of Glendale Collection System (2006-0003-DWQ & 2008-0002-EXEC) Exhibit Log
 Inspected by: Craig Blett (PG Environmental, LLC) and Jim Fisher (State Water Board)

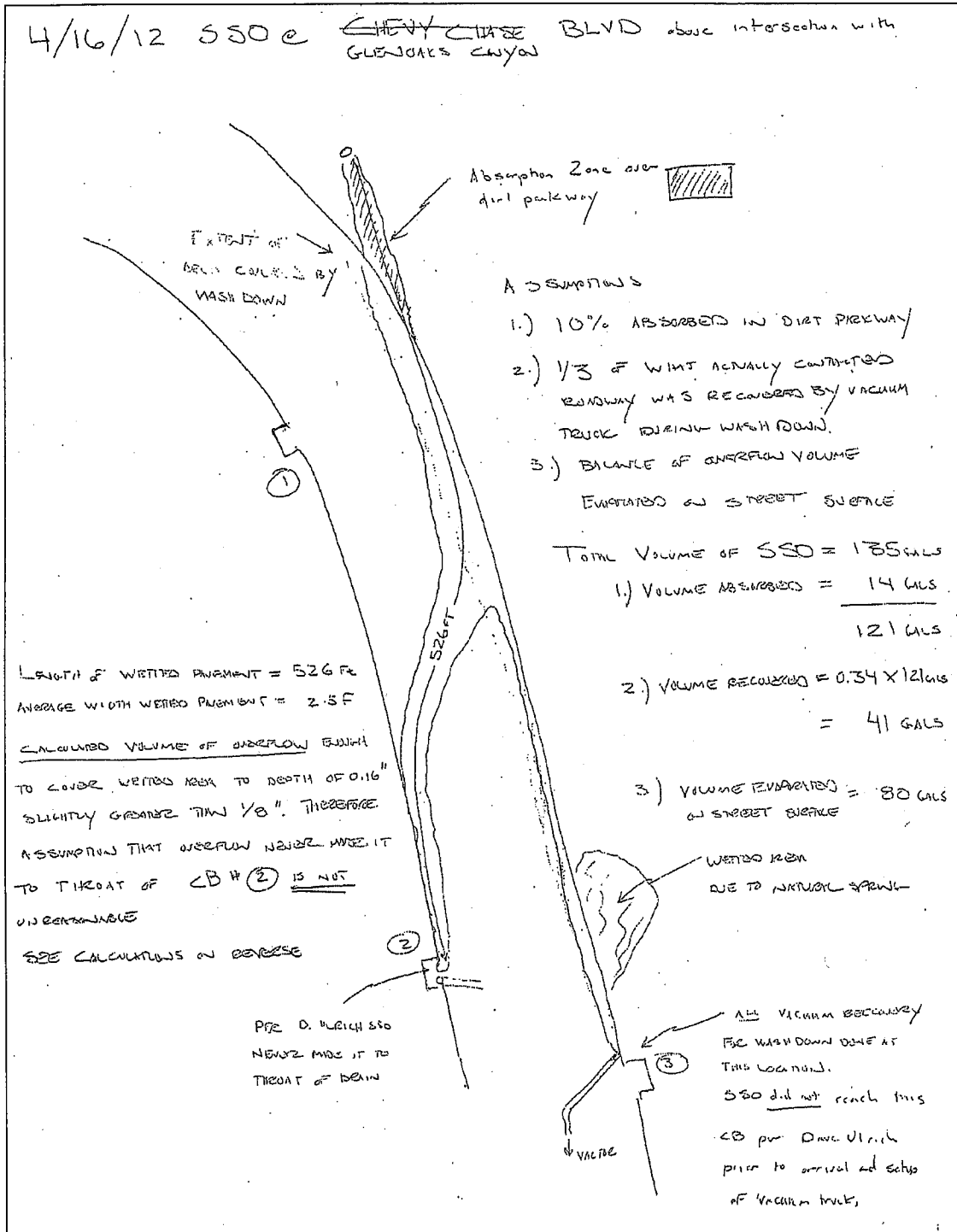


Exhibit 3: Unsigned and undated (date at top of page refers to spill date) sketch used to justify changing reported volumes for spill on April 16, 2012 at 2800 Glenoaks Boulevard.

City of Glendale Collection System (2006-0003-DWQ & 2008-0002-EXEC) Exhibit Log
 Inspected by: Craig Blett (PG Environmental, LLC) and Jim Fisher (State Water Board)

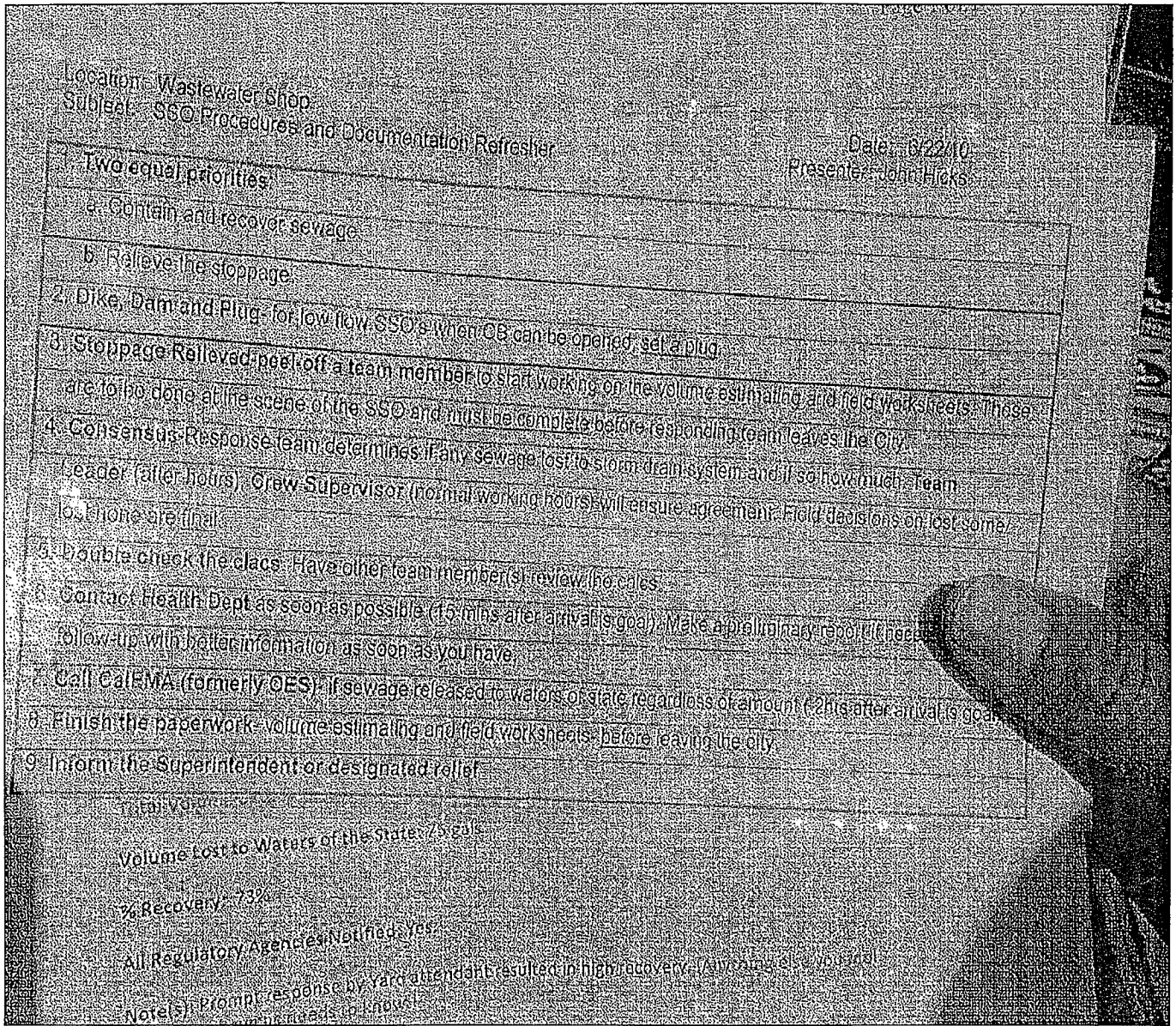


Exhibit 4: Photograph of a field crew guide for responding to and reporting SSOs. Item 4. states: "Consensus-Response team determines if any sewage lost to storm drain system and if so how much. Team Leader (after hours), Crew Supervisor (normal working hours) will ensure agreement. Field decisions on lost some/lost none are final." Also note in Item 7., the CalEMA (formerly OES) 2 hour notification is stated as a "goal", not a requirement.

City of Glendale Collection System (2006-0003-DWQ & 2008-0002-EXEC) Exhibit Log
 Inspected by: Craig Blett (PG Environmental, LLC) and Jim Fisher (State Water Board)

-118.29116

9/207

City of Glendale California
 Wastewater Maintenance Section
 Rev. 8/11/09
SSO Field Worksheet

Location of SSO: 625 CAVANAGH RD. 1 MELWOOD
(closest street address to overflow/cross street)

Latitude: _____ Longitude: _____
(Handheld GPS- decimal minutes) (Handheld GPS- decimal minutes)

Latitude: N Deg. _____ Min. _____ Sec. _____ Longitude: W Deg. _____ Min. _____ Sec. _____
(No decimal format) (No decimal format)

Date and time sanitary sewer system agency (Time Maintenance Services was informed) was notified or discovered spill: 1/12/11 1:05
MM/DD/YY Time 24 hr

Estimated spill start date/time: 1/12/11 10:00 AM
(Same as time immediately above unless you have reliable info of earlier start) MM/DD/YY Time 24 hr

Estimated operator arrival date/time: 1/12/11 1:25 pm
MM/DD/YY Time 24 hr

Estimated spill volume: (Attach Calculations) A. 2350 gallons

Estimated volume of spill recovered: B. 390 gallons

Estimated volume of spill that reached surface water, drainage channel, or not recovered from storm drain: C. 1960 gallons

Did you answer yes to either question #2 or #3 above?..... Yes / No

If Yes call OES within 2 hrs of time agency notified or discovered spill.

OES Control # 11-0228 OES Phone # 1-800-852-7550
 Time OES notified: 1/12/11 3:24
MM/DD/YY Time 24 hr

Call supervisor to review circumstances and reporting. _____
 Supervisor called: _____
MM/DD/YY Time 24 hr

Special circumstances/Comments: _____

Attach This Worksheet to The Stoppage Report Package for This Event

Exhibit 5: SSO Field Worksheet for SSO on January 12, 2011 at 625 Cavanagh Road. According to this record, the City was aware of the spill at 1:05 PM (Glendale Department of Water and Power notification time) and OES was notified at 3:24 PM, exceeding the Amended MRP requirement of 2 hours. (Page 1 of 3)

City of Glendale California
 Wastewater Maintenance Section
 Rev. 12/15/11
SSO Field Worksheet

Location of SSO: 637 Cannon Dr. / Millar
(closest street address to overflow/cross street)

Date and time sanitary sewer system agency (Time Maintenance Services was informed)
 was notified or discovered spill: 4/4/12 8:40 AM
MM/DD/YY Time 24 hr

Estimated spill start date/time:
(Same as time immediately above unless you have reliable info. of earlier start) 4/4/12 8:40 AM
MM/DD/YY Time 24 hr

Estimated operator arrival date/time: 4/4/12 9:00 AM
MM/DD/YY Time 24 hr

Spill appearance point (Check one):

Estimated total spill volume: (Attach Calculations) A. 155 gallons

Estimated volume of spill recovered: B. 55 gallons

Estimated volume of spill that reached surface water,
 drainage channel, or not recovered from storm drain: C. 100 gallons

Did you answer yes to either question #2 or #3 above?..... Yes/No

If Yes call OES within 2 hrs of time agency notified or discovered spill.

OES Phone # 1-800-852-7550

OES Control # 12-1988 Time OES notified: 4/4/12 11:15 AM
MM/DD/YY Time 24 hr

Call supervisor to review circumstances and reporting. 4/4/12 9:30 AM
 Supervisor called: RB MM/DD/YY Time 24 hr

Special circumstances/Comments: _____

Attach This Worksheet to The Stoppage Report Package for This Event

Exhibit 5 (Cont.): SSO Field Worksheet for SSO on April 4, 2012 at 637 Cannon Drive Spill started at 8:40 AM
 and OES was notified at 11:15 AM, exceeding the Amended MRP requirement of 2 hours. (Page.2 of 3)

City of Glendale Collection System (2006-0003-DWQ & 2008-0002-EXEC) Exhibit Log
 Inspected by: Craig Blett (PG Environmental, LLC) and Jim Fisher (State Water Board)

City of Glendale California
Wastewater Maintenance Section
 Rev. 8/11/09
SSO Field Worksheet

Location of SSO: 3324 CRAIL WAY 1 WASHINGTON HWY
(closest street address to overflow/cross street)

Latitude: _____ **Longitude:** _____
(Handheld GPS- Decimal minutes) (Handheld GPS- Decimal minutes)

Latitude: N Deg. _____ Min. _____ Sec. _____ **Longitude:** W Deg. _____ Min. _____ Sec. _____
(No decimal format) (No decimal format)

Date and time sanitary sewer system agency (Time Maintenance Services was informed) was notified or discovered spill: pe 11-7-11 8:05 AM
MM/DD/YY Time 24 hr

Estimated spill start date/time: PENDING 11-7-11 8:05 AM
(Same as time immediately above unless you have reliable info of earlier start) MM/DD/YY Time 24 hr

Estimated operator arrival date/time: 11-7-11 8:45
MM/DD/YY Time 24 hr

Estimated spill volume: (Attach Calculations) A. 200 gallons

Estimated volume of spill recovered: B. 1 gallons
221

Estimated volume of spill that reached surface water, drainage channel, or not recovered from storm drain: C. 209 gallons
209

Did you answer yes to either question #2 or #3 above?..... Yes No

If Yes call OES within 2 hrs of time agency notified or discovered spill.
KEVIN OES Phone # 1-800-852-7550

OES Control # 11-0020 Time OES notified: 11-7-11 10:47 AM
MM/DD/YY Time 24 hr

Call supervisor to review circumstances and reporting. _____
 Supervisor called: _____ MM/DD/YY Time 24 hr

Special circumstances/Comments: _____

Attach This Worksheet to The Stoppage Report Package for This Event

Exhibit 5 (Cont.): SSO Field Worksheet for SSO on November 7, 2011 at 3324 Crail Way. Spill started at 8:04 AM and OES was notified at 10:47 AM, exceeding the Amended MRP requirement of 2 hours. (Page 3 of 3)