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ENVIRONMENTAL PROTECTION

State Water Resources Control Board

August 02, 2011

Certified Mail No. 7004-1160-0002-0465-7584

Dennis McBride
Legally Responsible Official
City of Redding
Public Works Department
P.O. Box 496071
Redding, California 96049-6071

Dear Mr. McBride,

FINAL AUDIT REPORT AND REQUEST FOR INFORMATION

The State Water Resources Control Board's Office of Enforcement and Regional Water Quality Control Boards are conducting audits of sewer collection systems to evaluate the City of Redding's (City) compliance with "Waste Discharge Requirements for Sanitary Sewer Systems," Water Quality Order No. 2006-0003-DWQ¹ (hereafter, SSSWDRs), and the Amended Monitoring and Reporting Program (hereafter, Amended MRP).²

The audit includes an onsite inspection and subsequent technical review of pertinent collection sewer system information, including review of the sewer system management plan (SSMP), maintenance, operations, management, sewer use ordinances, financial information, and other areas to evaluate the City's compliance with all requirements of the SSSWDR, including efforts to eliminate, reduce and/or mitigate SSOs. The audit is the primary tool used by staff to support enforcement decisions.

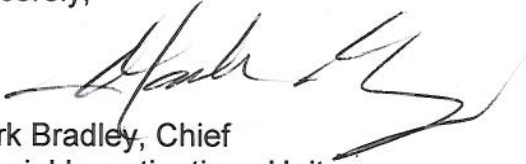
To complete our audit process, your responses to each of the "Violations" and "Areas of Concerns" identified in section 1.0 of the Audit Report (enclosed) is requested. Please provide the above information by **September 16, 2011**.

If you have any questions, please contact me at (916) 341-5891, or via email at <mbradley@waterboards.ca.gov>, or Jim Fischer at (916) 341-5548, or via email at <jfischer@waterboards.ca.gov>.

¹ http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2006/wqo/wqo2006_0003.pdf

² http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2008/wqo/wqo2008_0002_exec.pdf

Sincerely,



Mark Bradley, Chief
Special Investigations Unit
Office of Enforcement

Enclosures: Audit Report.

cc: Jim Fischer
Office of Enforcement

Greg Cash
Central Valley Regional Water Board, Redding Office

Daniel Warner
Central Valley Regional Water Board, Redding Office

Redding City Clerk
777 Cypress Avenue
Redding, CA 96001

STATE WATER RESOURCES CONTROL BOARD
Office of Enforcement, Special Investigations Unit
1001 I Street, 16th Floor, Sacramento, CA 95814



Evaluation of the City of Redding's Compliance
with the Sanitary Sewer System Waste Discharge Requirements (SSSWDRs)
(Water Quality Order No. 2006-0003-DWQ)

Waste Discharge ID #5SSO10801

Redding, CA



Audit Commencement: 8/5/2010
Preliminary Draft: 8/26/2010
Final Audit Report: 6/27/2011

Prepared by: Jim Fischer, P.E., Investigator
Special Investigations Unit

Reviewed by: Mark Bradley, Chief
Special Investigations Unit

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LIST OF ATTACHMENTS

- Attachment A City of Redding Notice of Intent and Legally Responsible Officials
- Attachment B City of Redding Sanitary Sewer Overflows (SSOs) (9/2/2007 to 04/01/2011)
- Attachment C City of Redding “No Spill Certifications” and Sewer System Management Plan (SSMP) Certifications
- Attachment D City of Redding Collection System Questionnaire
- Attachment E City of Redding Noncompliance Reminder Emails
- Attachment F Notice of Violation (NOV) and Administrative Civil Liability (ACL) complaint for Jenny Creek

PREFACE

The State Water Resources Control Board (State Water Board), Office of Enforcement and Regional Water Quality Control Boards (Regional Water Boards) are conducting audits of sewer collection systems to evaluate compliance with “Waste Discharge Requirements for Sanitary Sewer Systems,” Water Quality Order No. 2006-0003-DWQ¹ (hereafter, SSSWDRs), and the Amended Monitoring and Reporting Program (hereafter, Amended MRP)².

The audit includes an onsite inspection and subsequent technical review of pertinent collection sewer system information, including review of the sewer system management plan (SSMP), maintenance, operations, management, sewer use ordinances, financial information, and other areas to evaluate the City of Redding’s compliance with all requirements of the SSSWDRs, including efforts to eliminate, reduce and/or mitigate sanitary sewer overflows (SSOs). The audit is the primary tool used by staff to support enforcement decisions.

This Audit Report has been written in compliance with the Water Quality Enforcement Policy adopted by the State Water Board (effective May 2010).

¹ http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2006/wqo/wqo2006_0003.pdf

² http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2008/wqo/wqo2008_0002_exec.pdf

1.0 FINDINGS

The following findings are inclusive of the onsite inspection and post-inspection review process, which includes evaluation of the City of Redding's (City's) compliance with the SSSWDRs, including the sanitary sewer management plan (SSMP) and Amended Monitoring and Reporting (Amended MRP) provisions.

VIOLATIONS		
FINDING	CITATION(S)	COMMENTS
SSO DISCHARGES		
<i>Based on review of CIWQS³ data, the City certified 22 separate Sanitary Sewer Overflows (SSOs) between 9/2/07 and 04/01/11 that reached surface waters.</i>	SSSWDRs, sections C.1 and C.2	To verify compliance with the SSO reporting requirements in the Amended MRP, the City must provide a separate written verification that all SSOs discharged from the City's collection system between 9/2/07 to 04/01/2011 have been accurately reported and certified in CIWQS. In addition, to verify compliance with the SSSWDRs, Prohibition C.2, the City must indicate which SSOs (if any) created a nuisance as defined by CWC 13050(m).
REPORTING		
<i>The City failed to update its Collection System Questionnaire within 12 calendar months.</i>	SSSWDRs, section G.3	Section G.3 of the SSSWDRs requires that the Collection System Questionnaire be updated at least annually. The City failed to comply with this provision. (See Attachment E1.) The City must explain why it violated this provision.
<i>The City failed to complete its monthly reporting for September 2007.</i>	SSSWDRs, Amended MRP, section A.7.	The City must either perform a "No Spill Certification" or certify an SSO for calendar month September 2007. (See Attachment E1.) The City must explain why it violated this monthly reporting provision.
<i>The City failed to certify nine SSOs within reporting timeframes required by the Amended MRP. (See Attachment F.)</i>	SSSWDRs, Amended MRP	The City failed to certify the following SSOs within the required timeframes dictated under the Amended MRP: CIWQS event ID # 710886, 713952, 717019, 718946, 724287, 724780, 733610, 737314, and 747268. For each SSO, the City must explain why it violated the reporting provisions.
<i>The City missed the Amended MRP two-hour notification requirements for six SSOs. (See Attachment F.)</i>	SSSWDRs, Amended MRP	The City failed to meet the two-hour notification requirements for the following SSOs: CIWQS event ID # 717019, 724287, 724780, 737314, 747268, and 749193. For each SSO, the City must explain why it violated the reporting provisions.

³ California Integrated Water Quality System (CIWQS), hosted by the State Water Board (See www.waterboards.ca.gov/ciwqs)

VIOLATIONS

FINDING	CITATION(S)	COMMENTS
Sewer System Management Plan (SSMP)		
<p><i>The City's System Evaluation and Capacity Assurance Plan (SECAP) in the SSMP (Section VII on page 17) is inadequate.</i></p>	<p>SSSWDRs, section D.13(viii)</p>	<p>In accordance with section D.13(viii), the SECAP, at a minimum, must provide the following information: Evaluation (actions needed to evaluate portions experiencing SSOs due to hydraulic deficiencies), design criteria, capacity enhancement measures, and a schedule for capital improvements to be made to the sewer system. The District must update the SSMP accordingly to include this minimum information.</p>

AREAS OF CONCERN		
FINDING	CITATION(S)	COMMENTS
Sewer System Management Plan (SSMP)		
<i>The City should be more proactive with providing emergency notification signage at all sewage lift stations.</i>	SSSWDRs, sections D.8, D.13(vi)	Based on the inspection, it appears the City is not currently displaying emergency contact information at its sewage lift stations, which could delay the public's response in notifying the City in the event of an SSO. The City should add emergency phone contact information signage to each lift station.
<i>Section II of the City's SSMP (page 4) does not adequately list specific and individual lines of authority, and each individual's specific SSMP responsibilities.</i>	SSSWDRs, sections D.13 (ii)	The City should improve the organizational descriptions and revise the SSMP accordingly.
<i>Section 4.5 (page 9) of the City's SSMP does not provide an adequate description of how the City ensures that its staff and/or contractors are adequately trained on the City's Operations and Maintenance procedures and Overflow Emergency Response Plan.</i>	SSSWDRs, sections D.8, D.13(iv)(d)	The City should add a new narrative section to the SSMP to expand this element. Information discussed during the inspection regarding compliance with these requirements should be included in the City's SSMP.
<i>Based on post-inspection review of the SSMP, the City's Communication Program is inadequate.</i>	SSSWDRs, section D.13(xi)	The City should expand the SSMP (section XI) to demonstrate how the City is "communicating with the public on a regular basis" regarding the development, implementation and performance of the SSMP. The City should also expand the SSMP to include information on how the City communicates with collection systems that are tributary and/or satellite to the City's sewer system.
<i>The City's Monitoring, Measurement and Program Modifications (section IX in the SSMP) should be improved.</i>	SSSWDRs, section D.13(ix)	To be more complete, the City should expand this section in its SSMP to demonstrate how the City is identifying, tracking, and monitoring SSO trends and reduction performance.

SUGGESTED ENHANCEMENTS

FINDING	CITATION(S)	COMMENTS
Sewer System Management Plan (SSMP)		
<p><i>The City's SSMP Audit, due on 6/22/2011 (2 years following approval of the initial SSMP by the City's local governing Board), should be included in the City's SSMP.</i></p>	<p>SSSWDRs, section D.13(x)</p>	<p>The City should revise the SSMP and include the results of its SSMP Audit.</p>

2.0 BACKGROUND INFORMATION

The City of Redding owns and operates a sanitary sewer system, entitled “Redding CS”, enrolled under Order No. 2006-0003-DWQ as “Redding City CS,” and issued Waste Discharger ID (WDID) #5SSO10801 by the State Water Board.

According to the information supplied by the City’s online “Collection System Questionnaire” (See Attachment D), the collection system serves a population of 91,000, and consists of 423 miles of gravity sewers, seven miles of forced mains and other pressurized systems, 312 miles of service laterals (all privately owned and none of which is maintained by the City), and 33,000 sewer service connections. The City also owns, operates and maintains 17 pump/lift stations throughout the collection system network. Untreated wastewater entering the collection system from all connections is routed to one of two wastewater treatment plants for proper treatment and disposal.

Based on information certified by the City, the collection system has experienced periodic SSOs, some of which have resulted in violations of the SSSWDRs, where untreated or partially sewage reached surface waters. (See Attachment B.)

3.0 PRE-INSPECTION REVIEW

The following information was reviewed by the Office of Enforcement prior to conducting the inspection:

Attachment A	City of Redding Notice of Intent and Legally Responsible Officials
Attachment B	City of Redding Sanitary Sewer Overflows (SSOs) (9/2/2007 to 04/01/2011)
Attachment C	City of Redding “No Spill Certifications” and Sewer System Management Plan (SSMP) Certifications
Attachment D	City of Redding Collection System Questionnaire
Attachment F	Notice of Violation (NOV) and Administrative Civil Liability (ACL) complaint for Jenny Creek

4.0 INSPECTION NARRATIVE

The inspection team (Daniel Warner and me, Jim Fischer) conducted an unannounced inspection as a result of a request from the Central Valley Regional Water Quality Control Board (Redding office). The purpose of the inspection was to determine the City's compliance with the requirements of the SSSWDRs to ensure proper system operation, maintenance, and management of its collection system.

Contact information for the inspection participants:

Discharger:	City of Redding		
Facility Address:	20055 Viking Way, Redding, California, 96003		
WDR Orders:	2006-0003-DWQ (SSWDRs) and 2008-0002-EXEC (amended MRP)		
Inspection Date:	August 5, 2010		
Attendee Name	Title	Organization	Phone Number
James Fischer	Investigator/ Water Resource Control Engineer	State Water Resources Control Board, OE	(916) 341-5548
Daniel Warner	Water Resource Control Engineer	Regional Water Quality Control Board 5, Redding Office	(530) 224-4848
Josh Keener	Wastewater Utility Compliance Coordinator	City of Redding	(530) 224-4122
Jon McClain	Assistant Director of Public Works	City of Redding	(530) 224-6029
Dennis McBride	Wastewater Utilities Manager	City of Redding	(530) 224-6063

INSPECTION TIMELINE

An inspection timeline, including the major inspection activities and tasks covered:

TIME	INSPECTION ACTIVITY / TASK
0915-1200	Introductions Overview of collections system and pump/lift station assets Discussion of City's sewer system characteristics, operation and maintenance (O&M), staffing, funding, and capital improvement projects
1200-1300	Inspection of City's shop and Corporation Yard
1300-1400	Lunch
1400-1420	Inspection of North Market lift station
1430-1510	Inspection of Sunnyhill lift station
1520-1545	Site visit to Jenny Creek area to inspect sewer line upgrades
1545	End of inspection

4.1 Arrival and Inspection Commencement

TIME: 0915

The inspection team (Daniel Warner and me, Jim Fischer), entered the Redding Public Works building offices at 20055 Viking Way in Redding, California at approximately 0915 on August 5, 2010 for an unannounced inspection of the collection system. Dry and mild weather conditions prevailed for the duration of the inspection and historical weather data shows no precipitation in the Redding area for the week preceding the inspection.

We began the office portion of the inspection in the City's conference room with brief introductions and we discussed the purpose of the unannounced inspection with the City representatives. Next, we discussed a proposed inspection agenda with Josh Keener (Keener) and Jon McClain (McClain) to show them the list of areas and activities proposed to be covered for our inspection activities. We also requested that City collections staff be available for us later in the day for inspection of sewer lift station assets, which includes review of the City's standard operating procedures for maintaining these assets.

Following discussion about our proposed agenda, McClain stated that he was "concerned" regarding our unannounced visit and requested that in future visits we give the City managers at least a one day notice to allow them time to modify staff schedules to accommodate the inspection activities. I explained to McClain that the goal of conducting the inspection unannounced is to help ensure that we inspect the City's collection system in "as close to normal operating conditions as possible." I also offered to terminate our inspection if McClain wished, and return on future date(s) to inspect the collection system. After hearing this statement, McClain said he was ok with having us proceed with the inspection as planned and gave us his consent to continue. At approximately 10:35, Dennis McBride (McBride) from the City joined our discussion in the conference room.

The following is a detailed list of the program areas and information discussed during the inspection.

4.2 System Operations, Maintenance and Management [evaluate compliance with SSSWDRs, sections D.3, D.8, D.9, D.13(iv), D.13(v), D.13(vi), and Amended MRP]

- Sewer System Overview, Operations and Flow Monitoring: We asked City staff to provide a general overview of the sewer system, including its operational characteristics, geography, pump/lift station network, and force main systems. We also asked for and received an overview map of the collection system to help us orient ourselves to the areas we intended to inspect during our visit. City staff told us that they have been using a Geographical Information System (GIS) for mapping all sewer components since 2002. In addition, the City provided us with some basic information about the City's two wastewater treatment plants that serve the Redding regional area (Clear Creek and Still Water). City staff also provided some information about their collection system monitoring efforts in place. They said they manage and maintain their own network of 17 flow meters, which are periodically moved and circulated within 74 established monitoring locations, which assist with obtaining information to support hydraulic modeling and determine inflow and infiltration (I/I). The City described some future projects planned for their monitors, including having them all tied into the City's Supervisory Control and Data Acquisition (SCADA) system, which would include the ability for the City to use radios to download data from the meters. They said that currently, all flow monitoring data is manually downloaded from each instrument by collections staff.
- Root Control Program: We asked the City if they implement any type of root control program in the sewer system. City staff said that they have an annual chemical root control program, and they routinely direct outside contractors to apply chemicals where needed.

- Inspections for Illicit Connections: We asked the City if they have a program to routinely check sewers for illicit connections. City staff said that they have an inspection program in place, and they perform smoke testing on an annual basis to check for illicit sewer connections. They said most of the time, no enforcement action by public works is needed when they find illicit connections, and they said they typically engage the City’s Code Enforcement section to assist public works with these issues if and when they arise.
- Sewer Upgrades and Projects: We asked the City to discuss any ongoing sewer improvement projects, including projects to reduce inflow and infiltration (I/I) into the sewers. City staff said that they have a number of sewer projects in place, including projects to help them reduce I/I, focusing attention on old pipes located on the west side of Redding. They said that much of the City’s ongoing rehabilitation work is focused on repairing and replacing sections causing I/I issues. Also, City staff said that after repairs are done to these sections, they plan to focus more attention on private lateral issues to help the City reduce their ongoing operating costs at each of the City’s wastewater treatment plants. To further reduce problems from laterals impacting the City’s sewer system, they said that the City is investigating implementation of a new program that would require private laterals to be inspected prior to the sale of a residential home.
- Sewer Use Rates: We asked City staff about current sewer use rates charged to customers connecting to the sewer system. The City representatives said that last June, the City adopted a series of sewer rate increases, which now includes a \$34 per month fee for both treatment and sewer collections.
- Collection System “Hot Spots”: We asked the City if they have any type of proactive sewer “hot spot” cleaning activities in place. City staff confirmed that they have a proactive “hot spot” cleaning program in place, which includes adding sections of sewers to their “hot spot” list as any problem areas are identified by crews.
- SSO Reporting Procedures: We asked the City to provide an overview of their internal procedures for tracking SSOs, including procedures for managing incoming sewer complaints from customers. City staff told us that they are currently using “CorpsTracks” software to manage all of their incoming sewer complaints. They said that the complaints are all logged into this system from callers who report spills to the City’s Utilities/Field Operations information line at 530-224-6068. They said that administration staff input all incoming complaints into their electronic data system and then crews are individually dispatched to handle responses to SSOs. City staff also told us that they estimate that up to 60% of all their incoming calls are for private lateral sewage discharges which are not within their jurisdiction since the City does not maintain or own any sewer service laterals.
- Proactive Measures for SSO Response: We asked City staff to describe their SSO response procedures, including procedures for how the City estimates SSO volumes discharged whenever a spill occurs. McBride responded by telling us that one of the most proactive measures the City has in place includes a “secured arrangement” with an outside firm to help assist the City with sewer emergencies such as responding to SSOs. McBride also told us that one of his goals in the future is to look into doing what the City can do to support and help other agencies in the surrounding area with responding to SSOs. McBride also said that that the City is “very cautious” with their SSO estimations and reporting procedures and that they rely solely on field collections crews for providing data to support certification information for spills and that City management does not participate in estimating SSO volumetric estimates. McBride also said that the collections crews use charts to assist with estimating volume discharged, and the crews use this information to calculate the spill volumes based on field notes and other information obtained for individual SSO events. McBride said that based on their experience, the 2-hour requirement for SSO notification “is hard to meet,” although he said that to date, the City has never had a problem meeting this requirement. City staff also told us that their collections crews are required to collect photographic evidence for all spills. In addition, to be proactive with responding and mitigating SSOs, City staff said that they built their own customized “SSO response trailer,” specifically designed and equipped for handling SSO emergencies in the field. The “SSO response trailer” was not available for inspection during our visit and was being serviced offsite.

- Pump/Lift Stations, Maintenance and Emergency Response Operations: We asked City staff to provide an overview of their pump/lift station network, specifically the age, operating condition and location of the stations, with emphasis on stations located immediately next to surface waters. The City has a total of 17 pump/lift stations throughout the collection system network, ranging in size from 0.8 to 2 million gallons per day (MGD) in capacity. The City said they have evaluated all the pump/lift stations in their network to be prepared for an SSO, and they have engineered specific control measures at some stations to prevent sewage from reaching surface waters, including large containments/berms surrounding some of the largest pump/lift stations in their network. To be as proactive as possible, City staff said that some of the pump/lift stations also have built-in redundancy in them, using “double discharge barrels” (two independent pipelines) to help them manage extra wastewater to prevent spills, and some of the stations have been outfitted with dedicated emergency power generators. Other stations have been equipped with quick connections for pumps and backup power for use by the City in the event of emergencies. Staff also told us that they have a large mobile 6-inch pump mounted on a trailer, and the City has plans to purchase two similar pumps for use in responding to and mitigating SSOs. We also asked the City to describe their specific procedures for conducting routine maintenance at pump/lift stations. City staff said that they have a dedicated pump/lift station crew who conducts daily rounds which include physical inspections of all but the smallest of the pump/lift stations in their network. We asked the City to provide information about the station alarm systems and they said that all of the pump/lift stations in their network are equipped with alarms that are all tested daily using their SCADA system, including some river crossings and siphons which are also included in their SACDA system. City staff also told us that they have developed customized spill response plans for every pump/lift station in their network. The City also said that for sewer emergencies, the City has an agreement in place with a private contractor, Rain for Rent, to have piping and pumps in place, up and running for the Sunnyhill lift station which they said is one of their most critical pump/lift stations in their network due to its size and proximity to the public and the Sacramento River. City staff also stated that they are “trying to get 100% reliability” for all of their pump/lift stations and they are currently developing some new projects which they plan to include in their sewer master plan.
- Force Main Sewer Inspections/Maintenance: We asked City staff to describe their current inspection and maintenance program for force main sewers. The City representatives told us that they are very proactive with force main cleaning and maintenance, and they regularly use “pigs” to clean the force main sewer lines to reduce build-up of solids in the pipelines.
- Collections Staff Training: We asked City staff to describe their current practices in place for training collections crews to comply with the SSSWDRs [sections D.8 and D.13(iv)(d)]. City staff told us that they require all collections staff to be certified by the California Water Environment (CWEA) for Sewer Collections to comply with these requirements. City staff also said that they regularly do lots of internal training for their collections crews and document these training activities on an ongoing basis. They told us that, as an example of this, they hold 30-minute meetings every day with about 10 to 12 collections staff to discuss the City’s “hot spots” and related sewer cleaning issues. Other examples include sending collections staff to ongoing outside training events hosted by CWEA.
- Jenny Creek Trunk Sewer Line Upgrades: We asked the City representatives to follow up on describing projects and upgrades made to the City’s collection system in the Jenny Creek area, which was the site of a large sewage spill (estimated between 20,000 and 64,000 gallons, none of which was recovered), occurring on October 15 and 22, 2007, resulting in enforcement action by the Central Valley Regional Water Quality Control Board (Redding Office). (See Attachment F for more information.) City staff said that as a result of the enforcement action, they have implemented many new projects and upgrades to these sewer lines in the Jenny Creek area, including upgrades to a large section of above ground sewer piping that previously had significant hydrogen sulfide corrosion on the inside of the pipes. They said that they have also included additional spare part inventories for these pipelines that are available in their shop and with pipe suppliers to better assist them in the event of another emergency such as an SSO. City staff said that they “went through and tested every section of pipe” in the Jenny Creek area. They also told us that many pipes were replaced and some ductile iron sections of pipe were also coated with epoxy to provide additional structural integrity and protection. In addition, the City said that they “streamlined” their sewer

system in this area, eliminating at least five manholes to improve sewer system operation. Additionally, City staff said that they installed “Y” pipes to enhance cleaning of these sewers.

4.3 Inspection: City shop and Corporation Yard [evaluate compliance with SSSWDRs, sections D.8, D.9, D.13(iv), D.13(vi)]

TIME: 1200

We met with the City representatives at the City’s shop and Corporation Yard to evaluate the City’s compliance with the above referenced sections of the SSSWDRs. This also included following up on the morning discussions about the City’s adequacy of O&M practices and also to review their readiness in preparing for and responding to SSOs, including review of spare parts, equipment, supplies, and materials. (See Photos 1-4.) Following our visit to the City’s mechanical shop, we were led by City staff to see their Corporation Yard where most of the City’s major sewer service equipment and supplies are stored. (See Photos 5-8.)

I asked the City representatives if the City has any type of workforce planning program in place to ensure that current and future resources are available for proper collection system maintenance, operations and management. The City representatives said that they regularly evaluate collections needs and abilities and also implement a formal work force retention planning program, pairing their older and more senior staff with significant sewer system knowledge and experience with their younger staff in the field. City staff also said that the City utilizes some part-time and temporary staff to help support their workforce retention program.

At the end of the inspection of the Corporation Yard, I asked the City representatives about the specific maps available to collection crews in the field vehicles. The City representatives said that all of their collection trucks are supplied with both collection and stormwater maps.



Photos 1-2: Photos of spare parts (L) and the inside view of the City's shop (R)



Photos 3-4: Spare pipe nipples, flanges and other pipe parts (L) and pumps inside City's shop (R)



Photo 5: Trailer-mounted mobile emergency standby generator at City's Corporation Yard



Photo 6: Trailer-mounted mobile emergency standby generator at City's Corporation Yard



Photo 7: Trailer-mounted mobile emergency standby pump at City's Corporation Yard



Photo 8: Spare pipe materials and other heavy equipment at City's Corporation Yard

4.4 Inspection: North Market lift station [evaluate compliance with SSSWDRs, sections D.8, D.9, D.13(iv), D.13(vi), Amended MRP]

Time: 1400

We met Keener and some of the City's collections staff at the North Market lift station to evaluate the City's compliance with the above referenced sections of the SSSWDRs. (See Photos 9-14.) This included checking the adequacy of the City's proactive efforts in maintaining this asset and reviewing its potential risk and threat for impacting surface waters in the event of an SSO. City routine inspection and emergency operating procedures were also reviewed. This lift station is located in close proximity to the Sacramento River (approximately 200 feet south), and is also in close proximity to a public access trail system. No audible/visual alarms or City phone contact information is published at the station which could help assist the public with notifying the City in the event of a problem such as an SSO.

No significant odors were noticed upon entry and no significant build up of corrosion, grease or solid materials were seen in the lift station's wet well. Keener told us that the lift station and some associated sewer lines adjacent to the station were upgraded in 2009, which included significant investments both to improve the station and also to bury old sections of elevated sewer lines that crossed the Sacramento River, including a tunneling project. Keener said improvements were made to upgrade the station's wastewater capacity, including installation of a new 42-inch incoming sewer line flowing out of the station. In addition, construction of an impoundment surrounding the entire lift station was installed to help prevent sewage from reaching surface waters in the event of an overflow at the station. Keener said that this impoundment structure has already been utilized in the recent past, capturing untreated wastewater that overflowed from the station due to a power failure issue.



Photos 9-10: North Market lift station (L) and dedicated emergency standby generator onsite (R)



Photos 11-12: North Market lift station engineered impoundment gate valve and overflow drain (L), and impoundment levy (R)



Photo 13: North Market lift station pipe taps and impoundment levy surrounding station shown in distance behind pipe taps.



Photo 14: Inspection of North Market lift station including review of inspection and operating procedures for lift station

4.5 Inspection: Sunnyhill lift station [evaluate compliance with SSSWDRs, sections D.8, D.9, D.13(iv), D.13(vi), Amended MRP]

TIME: 1430

Next, we met Keener and City collections staff at the Sunnyhill lift station to evaluate the City's compliance with the above referenced sections of the SSSWDRs. This included checking the adequacy of the City's proactive efforts in maintaining this asset and reviewing its potential risk and threat for impacting surface waters in the event of an SSO. City routine inspection and emergency operating procedures were also reviewed. We selected this station to inspect since it is located in close proximity to the Sacramento River, approximately 800 feet to the west of the station, and also in close proximity to Interstate 5, approximately 100 feet to the east of the station. (See Photo 15.) No audible/visual alarms or City phone contact information is published at the station which could help assist the public with notifying the City in the event of a problem such as an SSO.

No significant odors were noticed upon entry. Inspection of the wet well revealed no significant evidence of corrosion, solids or grease.

Keener told us that this station represents one of the City's biggest challenges, due to its small wet well size. Keener told us that the City is currently considering options for upgrading the capacity of this station, including an option to expand the size of the existing wet well capacity.

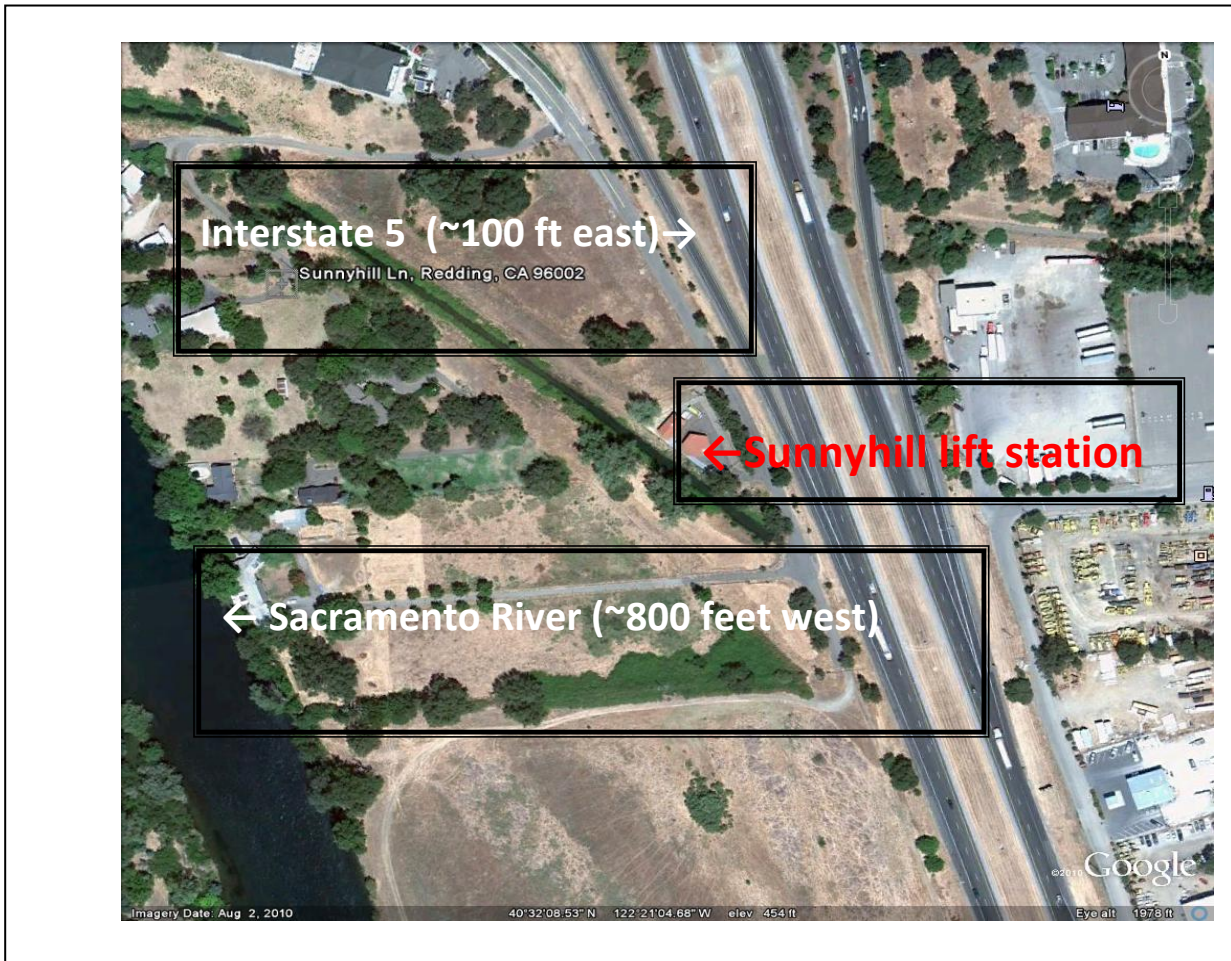


Photo 15: Sunnyhill lift station (adjacent to Interstate 5 and Sacramento River)



Photos 16-17: Sunnyhill lift station signage (L) and inspection of motors, pumps, and controls inside station (R)



Photo 18: Sunnyhill lift station dedicated emergency backup generator

4.6 Inspection: Jenny Creek Sewer Line Improvements [evaluate compliance with SSSWDRs, sections D.8, D.9, D.13(iv), D.13(vi)]

TIME: 1520

We met Keener at the Jenny Creek area to evaluate the City's compliance with the above referenced sections of the SSSWDRs. This included checking the adequacy of the City's proactive efforts in maintaining these assets and reviewing their potential risk and threat for impacting surface waters in the event of an SSO. We selected this station to inspect since it is located in close proximity to the Sacramento River and also to document improvements made by the City following the October 2007 SSO which resulted in enforcement action. (See Attachment F for more information)

No odors were present at this location. Keener told us that the crossing at Jenny Creek is one of the only elevated trunk crossings in the City's sewer system, running above ground for approximately one mile (See Photos 19-20.) Keener said that the previous SSOs at this site resulted in a \$77,000 administrative civil liability (ACL) penalty that was settled with the Central Valley Regional Water Quality Control Board (Redding office). Keener also said that the City is currently doing upstream flow monitoring near these sections of trunk sewers and that many "post overflow" improvements have been made in this area, including creek rehabilitation projects undertaken as part of the supplemental environmental project to ensure adequate access to these assets in the event of any future sewer line failure(s). We asked Keener about the City's inspection frequency for these assets and he told us that he thinks the City inspects this area about once every two months. Keener also told us that the City plans to phase out all of its elevated sewer line segments in the near future using capital improvement projects as funding allows.

TIME: 1545 (END OF INSPECTION)



Photo 19: Jenny Creek elevated gravity sewer crossing



Photo 20: Jenny Creek elevated gravity sewer crossing

TIME: 1545 END OF INSPECTION

6.0 POST-INSPECTION REVIEW

Following the inspection, I conducted an audit of the following information in order to evaluate compliance with SSSWDRs, sections D.8, D.9, D.13, G.3, and the Amended MRP:

1. Evaluation of the City's certified SSO reports in CIWQS (9/2/07 to 4/1/2011)
 - a. Finding: Based on review of CIWQS⁴ data, the City certified 22 separate SSOs that reached surface waters between 9/2/07 and 4/1/2011, in violation of Provision C.1, (See Attachment B.)
2. Evaluation of the City's notification and reporting compliance
 - a. Finding: The City failed to update its Collection System Questionnaire within 12 calendar months (required by SSSWDRs, section G.3).
 - b. Finding: The City failed to complete Category 1 SSO reporting within 15 calendar days for nine SSOs. (See Attachment D.)
 - c. Finding: The City failed to complete notification for six SSOs. (See Attachment F.)
 - d. Finding: The City failed to certify their final SSMP on time (due on August 2, 2009). SSMP was not certified until November 17, 2009 (107 days late).
 - e. Finding: The City was notified previously via email of the following violations:
 - i. Failure to provide monthly reporting for September 2007. (See Attachments E1 and E2.)
 - ii. Failure to certify the following SSOs. (See Attachment E1.) CIWQS ID# 656783, 729815, 716831, 731487, 726597, 730954, and 731259.
 - iii. Failure to certify the following SSOs. (See Attachment E2) CIWQS ID# 731487, 726597, 731259, 729815, 730954, and 656783.
3. Evaluation of the City's final certified SSMP (June 16, 2009 version)
 - a. Finding: The City's System Evaluation and Capacity Assurance Plan (SECAP) in its SSMP (page 17) is inadequate and does not meet the minimum standards required under the SSSWDRs, section D.13(viii)(a) through (d).
 - b. Finding: Based on the inspection, the City could be more proactive in providing emergency notification signage and phone numbers at each of its pump/lift stations to avoid any delays in the City's notification by the public in the event of an SSO.
 - c. Finding: Section II of the City's SSMP (page 4) does not adequately list specific and individual lines of authority and each individual's specific SSMP responsibilities, as required by SSSWDRs, section D.13(ii).
 - d. Finding: Section 4.5 (page 9) of the City's SSMP does not provide an adequate description of how the City ensures that its staff and/or contractors are adequately trained on the City's Operations and Maintenance procedures and Overflow Emergency Response Plan to comply with the SSSWDRs, sections D.8 and D.13(iv)(d).

⁴ California Integrated Water Quality System (CIWQS), hosted by the State Water Board (See www.waterboards.ca.gov/ciwqs)

-
- e. Finding: Based on post-inspection review of the SSMP, the City's Communication Program is inadequate to comply with the SSSWDRs, section D.13(xi).
 - f. Finding: The City's Monitoring, Measurement and Program Modifications (section IX in the SSMP) should be improved in the SSMP to comply with the SSSWDRs, section D.13(ix).
 - g. Finding: The City's SSMP Audit, due on 6/22/2011 (2 years following approval of the initial SSMP by the City's local governing board), should be included in the City's SSMP.

ATTACHMENT A: City of Redding Notice of Intent and Legally Responsible Officials

State Water Resources Control Board
NOTICE OF INTENT
 TO COMPLY WITH THE TERMS OF THE STATEWIDE GENERAL WASTE DISCHARGE
 REQUIREMENTS FOR SANITARY SEWER SYSTEMS
 (WATER QUALITY ORDER NO. 2006 - 0003 - DWQ)

60003853

I. Notice of Intent (NOI) Status

Mark Only One Item 1. New Permittee 2. Change of Information WDID #: 555010801

II. Agency Information

A. Legally Responsible Official JOHN TASELLO					
B. Agency CITY OF REDDING - WASTEWATER COLLECTION SYSTEM			C. Title SUPERVISOR - WASTEWATER COLLECTION SYSTEM		
D. Mailing Address P.O. BOX 496071			E. Address (Line 2)		
F. City REDDING		State CA	G. Zip 96049	H. County SHASTA	
I. Phone 530-224-6069		J. FAX 530-224-6071		K. Email Address jtasello.ci.redding.ca.us	
L. Sanitary Sewer System			M. Regional Water Quality Control Board CENTRAL VALLEY		
N. Agency Type (check one) 1. <input checked="" type="checkbox"/> City 2. <input type="checkbox"/> County 3. <input type="checkbox"/> State 4. <input type="checkbox"/> Federal 5. <input type="checkbox"/> Special District 6. <input type="checkbox"/> Government Combination					
O. Population of Community Served (check one) <input type="checkbox"/> Less than 50,000 <input checked="" type="checkbox"/> Greater than or equal to 50,000					

III. Billing Information

A. Agency CITY OF REDDING - WASTEWATER COLLECTION SYSTEM					
B. Contact Person JOHN TASELLO			C. Title SUPERVISOR - WASTEWATER COLLECTION SYSTEM		
D. Mailing Address P.O. BOX 496071			E. Address (Line 2)		
F. City REDDING		State CA	G. Zip 96049	H. County SHASTA	
I. Phone 530-224-6069		J. FAX 530-224-6071		K. Email Address jtasello@ci.redding.ca.us	

The annual fee, which is required by the California Water Code (section 13260), is based on the daily population served by the sanitary sewer system. Additionally, an ambient water monitoring surcharge of 9 percent is required for each annual fee. The total fee is the sum of the annual fee and ambient water monitoring surcharge. Please see the instructions on completing this NOI for a detailed explanation of the fee structure.

L. Total Fee (check one)

- Population served < 50,000 - total fee submitted is \$ 872.00
- Population served ≥ 50,000 - total fee submitted is \$ 4,676.00

A check for the appropriate total fee amount should be made payable to SWRCB and mailed with this completed NOI to the following address:

State Water Board Accounting Office
 P O Box 1888
 Attn: SSO Fees
 Sacramento, CA 95812-1888

SWRCB Tax ID is: 68-0281986

60003853

IV. Electronic Submittal Authorization

I, JOHN TASELLO, certify that I am the legally responsible official for
print name
CITY OF REDDING. My signature on this form certifies that, I
agency
 agree, my California Integrated Water Quality System (CIWQS) user ID and password
 constitute my electronic signature and any information I indicate I am electronically certifying
 contains my signature. I understand that I am legally bound, obligated, and responsible by use
 of my electronic signature as much as by a hand-written signature.

I agree that I will protect my electronic signature from unauthorized use, and that I will contact
 the State Water Resources Control Board, within 24-hours of discovery, if I suspect that my
 electronic signature has been lost, stolen, or otherwise compromised. I certify that my
 electronic signature is for my own use, that I will keep it confidential, and that I will not delegate
 or share it with any other person.

V. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction and
 supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the
 information submitted. Based on my inquiry of the person or persons who manage the system, or those persons
 directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is
 true, accurate, and complete. I am aware that there are significant penalties for submitting false information,
 including the possibility of fine and imprisonment. Additionally, I certify that the provisions of the Statewide General
 Waste Discharge Requirements for Sanitary Sewer Systems, including electronic reporting of all sanitary sewer
 overflows and development and implementation of a sewer system management plan, will be complied with."

A. Printed Name: JOHN TASELLO
 B. Title: SUPERVISOR - WASTEWATER COLLECTION
 C. Signature: John Tasello D. Date: 9-29-06

NOTE: Mail completed and signed form with a check for fee payment to the address below.

State Water Board Accounting Office
 P O Box 1888
 Attn: SSO Fees
 Sacramento, CA 95812-1888

State Water Resources Control Board
NOTICE OF INTENT
TO COMPLY WITH THE TERMS OF THE STATEWIDE GENERAL WASTE DISCHARGE
REQUIREMENTS FOR SANITARY SEWER SYSTEMS
(WATER QUALITY ORDER NO. 2006 - 0003 - DWQ)

I. Notice of Intent (NOI) Status

Mark Only One Item	1. <input type="checkbox"/> New Permittee	2. <input checked="" type="checkbox"/> Change of Information WDID #: <u>5 55010801</u>
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II. Agency Information

A. Legally Responsible Official <u>DWAYNE NORMAN</u>			
B. Agency <u>CITY OF REDDING</u>		C. Title <u>WASTEWATER COLLECTIONS SUPERVISOR</u>	
D. Mailing Address <u>P.O. BOX 496071</u>			
E. Address (Line 2)			
F. City <u>REDDING</u>	State <u>CA</u>	G. Zip <u>96099</u>	H. County <u>SHASTA</u>
I. Phone <u>530 224 6069</u>	J. FAX <u>530 224 6071</u>	K. Email Address <u>DNORMAN@CI.REDDING.CA.US</u>	
L. Sanitary Sewer System <u>REDDING CITY CS</u>		M. Regional Water Quality Control Board <u>CENTRAL VALLEY SR</u>	
N. Agency Type (check one) 1. <input checked="" type="checkbox"/> City 2. <input type="checkbox"/> County 3. <input type="checkbox"/> State 4. <input type="checkbox"/> Federal 5. <input type="checkbox"/> Special District 6. <input type="checkbox"/> Government Combination			
O. Population of Community Served (check one) <input type="checkbox"/> Less than 50,000 <input checked="" type="checkbox"/> Greater than or equal to 50,000			

III. Billing Information

A. Agency <u>CITY OF REDDING WASTEWATER COLLECTION SYSTEM</u>			
B. Contact Person <u>DWAYNE NORMAN</u>		C. Title <u>WASTEWATER COLLECTIONS SUPERVISOR</u>	
D. Mailing Address <u>P.O. BOX 496071</u>			
E. Address (Line 2)			
F. City <u>REDDING</u>	State <u>CA</u>	G. Zip <u>96099</u>	H. County <u>SHASTA</u>
I. Phone <u>530 224 6069</u>	J. FAX <u>530 224 6071</u>	K. Email Address <u>DNORMAN@CI.REDDING.CA.US</u>	

The annual fee, which is required by the California Water Code (section 13260), is based on the daily population served by the sanitary sewer system. Additionally, an ambient water monitoring surcharge of 9 percent is required for each annual fee. The total fee is the sum of the annual fee and ambient water monitoring surcharge. Please see the instructions on completing this NOI for a detailed explanation of the fee structure.

L. Total Fee (check one)

- Population served < 50,000 – total fee submitted is \$ 872.00
- Population served ≥ 50,000 – total fee submitted is \$ 4,676.00

A check for the appropriate total fee amount should be made payable to SWRCB and mailed with this completed NOI to the following address:

State Water Board Accounting Office
 P O Box 1888
 Attn: SSO Fees
 Sacramento, CA 95812-1888

SWRCB Tax ID is: 68-0281986

IV. Electronic Submittal Authorization

I, DWAYNE NORMAN, certify that I am the legally responsible official for
print name
CITY OF READING. My signature on this form certifies that, I
agency
 agree, my California Integrated Water Quality System (CIWQS) user ID and password
 constitute my electronic signature and any information I indicate I am electronically certifying
 contains my signature. I understand that I am legally bound, obligated, and responsible by use
 of my electronic signature as much as by a hand-written signature.

I agree that I will protect my electronic signature from unauthorized use, and that I will contact
 the State Water Resources Control Board, within 24-hours of discovery, if I suspect that my
 electronic signature has been lost, stolen, or otherwise compromised. I certify that my
 electronic signature is for my own use, that I will keep it confidential, and that I will not delegate
 or share it with any other person.

V. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. Additionally, I certify that the provisions of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, including electronic reporting of all sanitary sewer overflows and development and implementation of a sewer system management plan, will be complied with."

A. Printed Name: DWAYNE NORMAN
 B. Title: WASTEWATER COLLECTIONS SUPERVISOR
 C. Signature: *Dwayne Norman* D. Date: 11/14/08

NOTE: Mail completed and signed form with a check for fee payment to the address below.

State Water Board Accounting Office
 P O Box 1888
 Attn: SSO Fees
 Sacramento, CA 95812-1888

R

STATE WATER RESOURCES CONTROL BOARD
LEGALLY RESPONSIBLE OFFICIAL REGISTRATION FORM FOR THE SSO DATABASE

A legally responsible official (LRO) is any individual authorized to enter and certify data into the online sanitary sewer overflow (SSO) database on behalf of an agency enrolled under Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WQO No. 2006-0003). A LRO must certify any submitted SSO report. A LRO is defined as either a principal executive officer or ranking elected official for an agency, or a duly authorized representative of that person. To qualify as a duly authorized representative, an individual must receive authorization in writing from another LRO (this completed form satisfies this condition) and have responsibility for the overall operation of the regulated facility or activity. This form enables agencies to register an additional LRO for SSO reporting.

1. LRO Registration Information

I, Josh Keener, certify that I am a legally responsible official for

City of Redding My signature on this form certifies that, I agree, my
California Integrated Water Quality System (CIWQS) user ID and password constitute my electronic signature and any information I indicate I am electronically certifying contains my signature. I understand that I am legally bound, obligated, and responsible by use of my electronic signature as much as by a hand-written signature.

I agree that I will protect my electronic signature from unauthorized use, and that I will contact the State Water Resources Control Board, within 24-hours of discovery, if I suspect that my electronic signature has been lost, stolen, or otherwise compromised. I certify that my electronic signature is for my own use, that I will keep it confidential, and that I will not delegate or share it with any other person.

I have provided the following contact information:

Print Name: Josh Keener
Mailing Address: 777 Cypress Ave. Redding, CA 96001
Phone Number: (530) 224-4122
FAX Number: (530) 224-6071
E-Mail Address: jkeener@ci-redding.ca.us
Agency: City of Redding
Agency WDID #: 5A450103004
Sanitary Sewer System: Stillwater Wastewater Treatment Plant Collection System
Title/Role: Wastewater Compliance Coordinator

I certify that the above information is complete and correct. By signing this registration form, I agree, on behalf of myself and City of Redding, to be bound by its terms.

Signed: [Signature] Date: 10 / 28 / 09
complete page 2

2. Approved by a Legally Responsible Official for the agency on file with the State Water Board

I, Dennis McBride, certify that I am a legally responsible official for
print name

City of Redding. My signature on this form authorizes a legally
agency

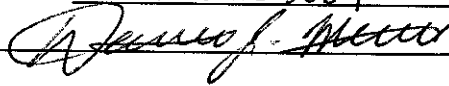
responsible official account to be created within CIWQS for the individual listed above. A legally

responsible official account will allow this individual to enter, edit, delete, and certify data associated with

SSO reports for the agency.

Regional Water Quality Control Board: Central Valley RWQCB

Agency WDID #: 5A450103004

Signature:  Date: 10, 28, 2009

Mail completed form to (this form must be mailed because an original signature is required to be on file):

CIWQS Registration
P.O. Box 671
Sacramento, CA 95812

NOTE: Please call the CIWQS Help Center with any questions regarding this form at (866)792-4977.

RS
✓

STATE WATER RESOURCES CONTROL BOARD LEGALLY RESPONSIBLE OFFICIAL REGISTRATION FORM FOR THE SSO DATABASE

A legally responsible official (LRO) is any individual authorized to enter and certify data into the online sanitary sewer overflow (SSO) database on behalf of an agency enrolled under Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WQO No. 2006-0003). A LRO must certify any submitted SSO report. A LRO is defined as either a principal executive officer or ranking elected official for an agency, or a duly authorized representative of that person. To qualify as a duly authorized representative, an individual must receive authorization in writing from another LRO (this completed form satisfies this condition) and have responsibility for the overall operation of the regulated facility or activity. This form enables agencies to register an additional LRO for SSO reporting.

1. LRO Registration Information

I, Dennis McBride, certify that I am a legally responsible official for
print name
City of Redding. My signature on this form certifies that, I agree, my
agency
California Integrated Water Quality System (CIWQS) user ID and password constitute my electronic signature and any information I indicate I am electronically certifying contains my signature. I understand that I am legally bound, obligated, and responsible by use of my electronic signature as much as by a hand-written signature.

I agree that I will protect my electronic signature from unauthorized use, and that I will contact the State Water Resources Control Board, within 24-hours of discovery, if I suspect that my electronic signature has been lost, stolen, or otherwise compromised. I certify that my electronic signature is for my own use, that I will keep it confidential, and that I will not delegate or share it with any other person.

I have provided the following contact information:

Print Name: Dennis McBride
Mailing Address: 777 Cypress Ave. Redding, CA 96001
Phone Number: (530) 224-6063
FAX Number: (530) 224-6071
E-Mail Address: dmcbride@cioredding.ca.us
Agency: City of Redding
Agency WDID #: 54450103001 5SS010001
Sanitary Sewer System: Clear Creek Wastewater Treatment Plant Collection System
Title/Role: Wastewater Utility Manager

I certify that the above information is complete and correct. By signing this registration form, I agree, on behalf of myself and City of Redding, to be bound by its terms.
agency

Signed: Dennis McBride Date: 10/29/09
complete page 2

2. Approved by a Legally Responsible Official for the agency on file with the State Water Board

I, Dennis McBride, certify that I am a legally responsible official for
print name

City of Redding My signature on this form authorizes a legally
agency

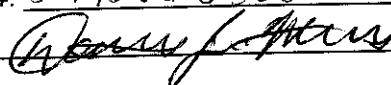
responsible official account to be created within CIWQS for the individual listed above. A legally

responsible official account will allow this individual to enter, edit, delete, and certify data associated with

SSO reports for the agency.

Regional Water Quality Control Board: Central Valley RWQCB

Agency WDID #: 54450103001

Signature:  Date: 10/29/09

Mail completed form to (this form must be mailed because an original signature is required to be on file):

CIWQS Registration
P.O. Box 671
Sacramento, CA 95812

NOTE: Please call the CIWQS Help Center with any questions regarding this form at (866)792-4977.

Fax

R

STATE WATER RESOURCES CONTROL BOARD DATA SUBMITTER REGISTRATION FORM FOR THE SSO DATABASE

A data submitter is any individual authorized by a legally responsible official (LRO) to enter data into the online sanitary sewer overflow (SSO) database on behalf of an agency enrolled under Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WQO No. 2006-0003). A LRO must certify any submitted SSO report. A data submitter may be other agency employees, contractors, labs, etc. A LRO is the only individual that can authorize data submitters on behalf of their agency. This form enables agencies to register a data submitter for SSO reporting.

1. Data Submitter Registration Information

Print Name: Joshua Vandiver
 Mailing Address: 777 Cypress Ave Redding CA 96001
 Phone Number: 530 224 6069
 FAX Number: 530 224 6071
 E-Mail Address: JVandiver@CI.Redding.CA.US
 Agency: City of Redding
 Agency WDID #: 5 SSO 10801
 Sanitary Sewer System: Redding City C.S.
 Title/Role: Supervisor / collections

Signed: *JVA* Date: 10/26/2009

2. Approved by a Legally Responsible Official for the agency on file with the State Water Board

I, DWAYNE NORMAN print name, certify that I am a legally responsible official for

CITY OF REDDING agency My signature on this form authorizes a data

submitter account to be created within CIWQS for the individual listed above. A data submitter account will allow this individual to enter, edit, and delete data associated with SSO reports for the agency.

Regional Water Quality Control Board: CENTRAL VALLEY

Agency WDID #: 5 SSO 10801

Signature: *Dwayne Norman* Date: 10/26/09

Mail, Fax, or e-mail completed form to:
 CIWQS Registration
 P.O. Box 671
 Sacramento, CA 95812
 Fax: (916)341-5935
 E-Mail: ciwqs@waterboards.ca.gov

NOTE: Please call the CIWQS Help Center with any questions regarding this form at (866)792-4977.

ATTACHMENT B: City of Redding Sanitary Sewer Overflows (SSOs) (9/2/2007 to 04/01/2011)

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: [\[REFINE SEARCH\]](#)

- Agency (**Redding City**)
- Spill Type (**sso_cat1_2**)
- Start Date (**09/02/2007**)
- End Date (**04/01/2011**)

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 Enrollee 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:

EVENT ID	Region	Responsible Agency	Collection System	SSO Category	Start Date	SSO Address	SSO City	SSO Vol	Vol of SSO Recovered	Vol of SSO Reached Surface Water	SSO Failure Point	WDID
656783	5R	Redding City	Redding City CS	Category 2	2007-09-03 18:24:00.0	1000 East Street	Redding	4	4	0		5SSO10801
704995	5R	Redding City	Redding City CS	Category 2	2007-10-10 05:15:00.0	2070 Skyline Drive	Redding	540	540	0		5SSO10801
705035	5R	Redding City	Redding City CS	Category 2	2007-10-10 11:30:00.0	795 Lincoln Street	Redding	100	100	0		5SSO10801
705693	5R	Redding City	Redding City CS	Category 1	2007-10-15 13:14:00.0	890 Pioneer Drive	Redding	20,155	0	20,155		5SSO10801
706433	5R	Redding City	Redding City CS	Category 1	2007-10-15 08:00:00.0	3035 Pioneer Drive	Redding	2,520	100	2,420		5SSO10801
710886	5R	Redding City	Redding City CS	Category 1	2008-01-04 09:10:00.0	Lakeside Drive	Redding	250	0	250		5SSO10801
712399	5R	Redding City	Redding City CS	Category 1	2008-02-02 22:00:00.0	East Cypress Avenue	Redding	22,500	0	22,500		5SSO10801
713952	5R	Redding City	Redding City CS	Category 1	2008-02-25 15:15:00.0			900	900	900	Main	5SSO10801
714573	5R	Redding City	Redding City CS	Category 1	2008-03-03 14:00:00.0	3105 Foothill Boulevard	Redding	10,000	0	10,000		5SSO10801
714647	5R	Redding City	Redding City CS	Category 1	2008-03-05 12:36:00.0	3105 Foothill Boulevard	Redding	23,000	0	23,000		5SSO10801
715594	5R	Redding City	Redding City CS	Category 2	2008-03-31 12:15:00.0			10	0	0		5SSO10801
715919	5R	Redding City	Redding City CS	Category 2	2008-04-06 11:35:00.0			400	400	0		5SSO10801
716213	5R	Redding City	Redding City CS	Category 2	2008-04-15 15:35:00.0	2334 Washington Ave	Redding	125	125	0		5SSO10801
717019	5R	Redding City	Redding City CS	Category 1	2008-05-03 19:00:00.0	1055 Harpole	Redding	700	700	700	Main	5SSO10801
717203	5R	Redding City	Redding City CS	Category 2	2008-05-09 11:00:00.0			20	0	0		5SSO10801
718946	5R	Redding City	Redding	Category	2008-06-03	3879 Patterson	Redding	75,000	75,000	75,000	Main	5SSO10801

719566	5R	Redding City	City CS Redding City CS	1 Category 2	13:15:00.0 2008-06-13 22:30:00.0	Court 2830 King Street	Redding	100	0	0	Main	5SSO10801
721140	5R	Redding City	Redding City CS	Category 2	2008-06-29 18:00:00.0	1310 Ridge Drive	Redding	50	0	0		5SSO10801
724287	5R	Redding City	Redding City CS	Category 1	2008-08-05 11:30:00.0			200	200	200	Sewer lift station	5SSO10801
724780	5R	Redding City	Redding City CS	Category 1	2008-08-14 20:00:00.0	Placer	Redding	30	30	30	Main	5SSO10801
726598	5R	Redding City	Redding City CS	Category 2	2008-09-18 14:30:00.0			500	500	0		5SSO10801
726890	5R	Redding City	Redding City CS	Category 2	2008-09-24 11:00:00.0			3	0	0		5SSO10801
727172	5R	Redding City	Redding City CS	Category 2	2008-09-29 14:00:00.0			200	0	0		5SSO10801
727241	5R	Redding City	Redding City CS	Category 1	2008-10-01 08:00:00.0			3,000	3,000	0		5SSO10801
727712	5R	Redding City	Redding City CS	Category 2	2008-10-08 09:45:00.0	Shasta Street	Redding	100	100	0	Main	5SSO10801
727758	5R	Redding City	Redding City CS	Category 2	2008-10-10 03:30:00.0	963 West St. Street	Redding	120	120	0	Main	5SSO10801
727792	5R	Redding City	Redding City CS	Category 2	2008-10-11 12:00:00.0	2439 Placer Street	Redding	100	100	0	Main	5SSO10801
729098	5R	Redding City	Redding City CS	Category 2	2008-11-08 16:00:00.0			350	350	0		5SSO10801
729815	5R	Redding City	Redding City CS	Category 2	2008-11-24 19:00:00.0	Lancers Lane	Redding	500	500	0	Main	5SSO10801
730313	5R	Redding City	Redding City CS	Category 2	2008-12-07 17:40:00.0	300 Boulder Creek Drive	Redding	500	0	0	Main	5SSO10801
730954	5R	Redding City	Redding City CS	Category 2	2008-12-20 17:00:00.0	2933 West Way	redding	10	0	0	Main	5SSO10801
731259	5R	Redding City	Redding City CS	Category 2	2008-12-30 08:20:00.0	1130 Continental Street	Redding	200	200	0	Main	5SSO10801
731260	5R	Redding City	Redding City CS	Category 2	2008-12-30 08:20:00.0	1130 Continental Street	Redding	200	200	0	Main	5SSO10801
731487	5R	Redding City	Redding City CS	Category 2	2009-01-06 11:22:00.0	1717 Benton Drive	Redding	15	15	0	Main	5SSO10801
731515	5R	Redding City	Redding City CS	Category 1	2009-01-04 10:30:00.0	975 North Market Street	Redding	3,000	3,000	0	electrical control panel	5SSO10801
731520	5R	Redding City	Redding City CS	Category 2	2009-01-06 11:20:00.0	1717 Benton Drive	Redding	15	15	0	Main	5SSO10801
731669	5R	Redding City	Redding City CS	Category 1	2009-01-09 11:05:00.0	2151 Wilson Avenue	Redding	1,500	1,500	0	Main	5SSO10801
733610	5R	Redding City	Redding City CS	Category 1	2009-02-16 10:30:00.0	407 Lake Boulevard	Redding	500	400	100	Main	5SSO10801
735094	5R	Redding City	Redding City CS	Category 1	2009-03-16 13:00:00.0	Willis Street	Redding	25,500	0	25,500		5SSO10801
735098	5R	Redding City	Redding City CS	Category 1	2009-03-16 13:00:00.0	Orang Avenue	Redding	51,000	0	51,000		5SSO10801
735141	5R	Redding City	Redding City CS	Category 1	2009-03-16 14:45:00.0	410 Overhill Drive	Redding	40,000	40,000	0		5SSO10801
			Redding	Category	2009-03-	975 Market						

735145	5R	Redding City	City CS	1	16	Street	Redding	30,000	30,000	0	5SSO10801
735435	5R	Redding City	Redding City CS	Category 2	2009-03-24	Venus Way	Redding	100	100	0	5SSO10801
735663	5R	Redding City	Redding City CS	Category 2	2009-03-27			400	400	0	5SSO10801
737120	5R	Redding City	Redding City CS	Category 2	2009-05-02	1717 Benton Drive	Redding	15	15	0	5SSO10801
737314	5R	Redding City	Redding City CS	Category 1	2009-05-09	7831 Terra Linda Way	Redding	1,400	1,400	1,400	Two 6"-8" diameter root balls plugged at Sewer Manhole invert. It appears that they came from upstream of manhole. 5SSO10801
746709	5R	Redding City	Redding City CS	Category 2	2009-11-07			20	20	0	5SSO10801
747268	5R	Redding City	Redding City CS	Category 1	2009-11-27	N/A Talofa Drive	Redding	600	600	600	Main 5SSO10801
747466	5R	Redding City	Redding City CS	Category 2	2009-12-10	1540 Cottonwood Avenue	Redding	115	115	0	Main 5SSO10801
748245	5R	Redding City	Redding City CS	Category 2	2010-01-05	705 Loma Vista Drive	Redding	2	2	0	Main 5SSO10801
748320	5R	Redding City	Redding City CS	Category 1	2010-01-11	N/A Cypress Avenue	Redding	1,680	0	1,680	Main 5SSO10801
748623	5R	Redding City	Redding City CS	Category 1	2010-01-20	N/A Lakeside Dr	Redding	150	0	150	Main 5SSO10801
749182	5R	Redding City	Redding City CS	Category 2	2010-02-05	630 Twin View Boulevard	Redding	60	60	0	Main 5SSO10801
749190	5R	Redding City	Redding City CS	Category 1	2010-02-07	N/A West Street	Redding	30	0	30	Main 5SSO10801
749193	5R	Redding City	Redding City CS	Category 1	2010-02-08	3252 Auburn Drive	Redding	780	780	780	Main 5SSO10801
749811	5R	Redding City	Redding City CS	Category 2	2010-02-16	3100 Foothill Boulevard	Redding	10	0	0	Main 5SSO10801
752851	5R	Redding City	Redding City CS	Category 2	2010-06-01	N/A N/A	Redding	500	500	0	Main 5SSO10801
754690	5R	Redding City	Redding City CS	Category 2	2010-07-05	N/A Sonoma Street	Redding	10	10	0	Main 5SSO10801
756301	5R	Redding City	Redding City CS	Category 2	2010-08-18	500 Davis Ridge Road	Redding	150	150	0	Main 5SSO10801
756302	5R	Redding City	Redding City CS	Category 2	2010-08-18	610 Churn Creek Road	Redding	40	0	0	Main 5SSO10801
756763	5R	Redding City	Redding City CS	Category 2	2010-09-02	1025 Denton Way	Redding	700	700	0	Main 5SSO10801
757165	5R	Redding City	Redding City CS	Category 2	2010-09-03	901 College View Drive	Redding	90	90	0	Main 5SSO10801
758118	5R	Redding City	Redding City CS	Category 1	2010-10-24	2700 Market Street	Redding	18,900	0	18,900	Main 5SSO10801
759101	5R	Redding City	Redding	Category	2010-11-10	N/A Hemingway	Redding	93	93	0	Main 5SSO10801

759392	5R	Redding City	Redding City CS	Category 1	2 07:48:00.0 2010-12-11 16:00:00.0	Street 2222 California Street	Redding	550	100	450	Main	5SSO10801
762373	5R	Redding City	Redding City CS	Category 2	2011-01-19 10:20:00.0	710 Pioneer Drive	Redding	400	400	0	Main	5SSO10801
763161	5R	Redding City	Redding City CS	Category 2	2011-02-04 13:17:00.0	Chestnut Street	Redding	50	50	0	Main	5SSO10801
763169	5R	Redding City	Redding City CS	Category 2	2011-02-16 11:55:00.0	Campers Court	Redding	138	0	0	Main	5SSO10801
765610	5R	Redding City	Redding City CS	Category 2	2011-03-14 08:20:00.0	Tehama Street	Redding	25	25	0	Main	5SSO10801
765612	5R	Redding City	Redding City CS	Category 2	2011-03-28 13:00:00.0	3251 School Street	Redding	25	25	0	Main	5SSO10801

The current report was generated with data as of: Tuesday, August 02, 2011



California Integrated Water Quality System Project (CIWQS)

COLLECTION SYSTEM OPERATIONAL REPORT

Please see the [Glossary of Terms](#) for explanations of the search results column headings. [More information about the report is found at the bottom of this page.](#)

[VIEW PRINTER FRIENDLY VERSION](#)

SEARCH CRITERIA: [\[REFINE SEARCH\]](#) [\[NEW SEARCH\]](#) [\[GLOSSARY\]](#)

Date Range: Start_Date (**09/02/2007**) End_Date (**04/01/2011**)

DRILLDOWN HISTORY: [\[GO BACK TO LISTING OF COLLECTION SYSTEMS\]](#)

Redding City CS

Agency: Redding City

General Information



<u>Region</u>	<u>Place ID</u>	<u>Place Name</u>	<u>CS Category</u>	<u>Place Address</u>	<u>Place County</u>
5R	631120	Redding City CS	Municipal	Redding, CA, 96049	Shasta

Collection System Spill Summary

Operational Indices: Redding City CS

Spill Rate Indice (#spills/100mi/yr)						
	Category 1			Category 2		
	Mainlines	Laterals	Not Specified	Mainlines	Laterals	Not Specified
Redding City CS	0.84	N/A	0.91	1.75	N/A	1.04
State - Municipal - Average	1.82	N/A	2.3	3.55	N/A	3.83
Region - Municipal - Average	1.83	N/A	1.26	4.55	N/A	3.53

Net Volume Spills Indice (Net Vol in gallons/1000 Capita/yr)						
	Category 1			Category 2		
	Mainlines	Laterals	Not Specified	Mainlines	Laterals	Not Specified
Redding City CS	65.4	N/A	475.13	2.45	N/A	0.87
State - Municipal - Average	732.64	N/A	2497.37	4.13	N/A	12.9
Region - Municipal - Average	518.21	N/A	3787.16	35.12	N/A	13.75

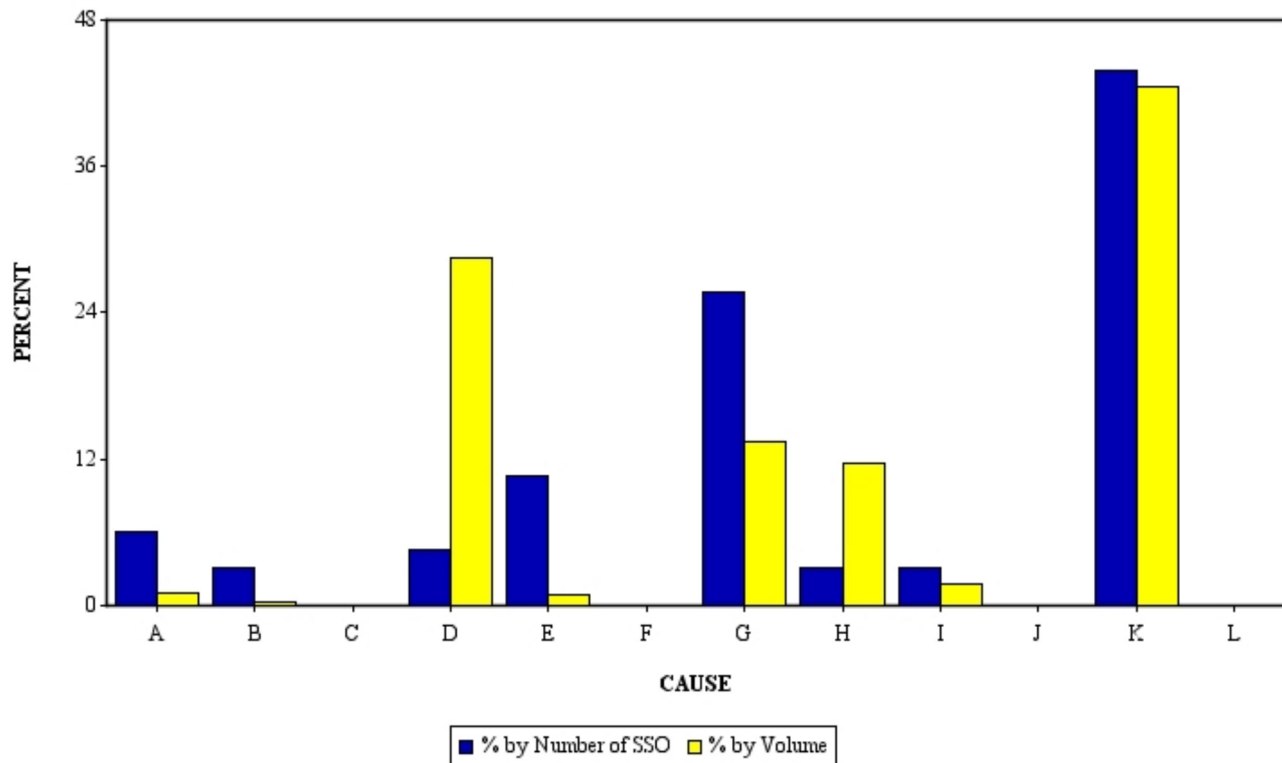
Note: Click on hyperlinks to get comparison charts for CS, Region, and State grouped by 'Miles Of Pipe'.

- (1) The number of Category 1 and 2 SSOs resulting from a failure in the Enrollee sewer system per 100 miles sewer system owned by the Enrollee per year.
- (2) Net Volume (volume spilled minus volume recovered) of SSOs, for which the reporting Enrollee is responsible, per capita (i.e. the population served by your agency's sanitary sewer system), per year.
- (3) Value calculated using miles of force mains and other pressure systems and miles of gravity sewers the agency is responsible for.
- (4) Value calculated using miles of laterals the agency is responsible for (Lower Only, Upper/Lower). For collection systems with no lateral responsibility a N/A is shown.
- (5) Value Calculated using total miles of collection system pipe the agency is responsible for.
- (6) Comparison made between similar collection systems type (e.g. municipal) and lateral responsibility for the entire state over the selected time period. Comparison indices are calculated for all similar collection systems and averaged for comparison.
- (7) Comparison made between similar collection systems type (e.g. Municipal) and lateral responsibility for collection systems in same region (e.g. Region 5S). Collection system indices are calculated for all similar collection systems and averaged for comparison. For airport, hospital, marinas, military, park, port, prison, school, and other collection systems facilities, only state comparison is shown.
- (8) For Criteria used and term definitions refer to the SSO Glossary of Terms.

Percentage of total Number and Volume of SSOs by Spill Cause

Collection System: Redding City CS

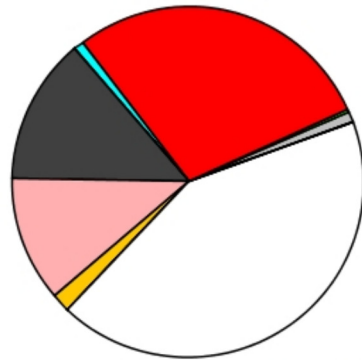
A=Debris-General, B=Debris-Rags, C=Debris, D=Flow exceeded capacity, E=Grease deposition(FOG), F=Operator error, G=Other, H=Pipe structural problem/failure, I=Pump station failure, J=Rainfall exceeded design, K=Root intrusion, L=Vandalism



Percentage of total Volume of SSOs by Spill Cause

Redding City CS

A=Debris-General, B=Debri-Rags, C=Debris, D=Flow exceeded capacity, E=Grease deposition(FOG), F=Operator error, G=Other, H=Pipe structural problem/failure, I=Pump station failure, J=Rainfall exceeded design, K=Root intrusion, L=Vandalism



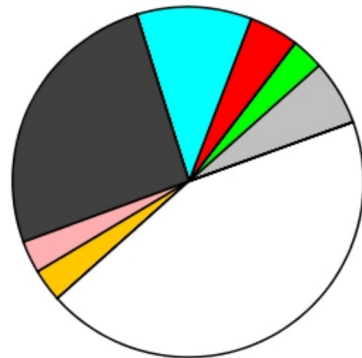
Region 5R

State of California

Percentage of total Number of SSOs by Spill Cause

Redding City CS

A=Debris-General, B=Debri-Rags, C=Debris, D=Flow exceeded capacity, E=Grease deposition(FOG), F=Operator error, G=Other, H=Pipe structural problem/failure, I=Pump station failure, J=Rainfall exceeded design, K=Root intrusion, L=Vandalism



Region 5R

Collection System Questionnaire Data(*)

Collection System Information: Redding City CS

Status	Active
Last Updated On	2011-03-07 08:58:19.0
Population Served	91,000
Miles of Force Main	7.3
Miles of Gravity Sewer	423.3
Miles of Laterals	312.5
Portion of Laterals Responsible	none
Miles of Laterals Responsible	
Number of Service Lateral Connection	33000
Sewer Constructed 2000 Current	13
Sewer Constructed 1980 1999	34
Sewer Constructed 1960 1979	20
Sewer Constructed 1940 1959	13
Sewer Constructed 1920 1939	12
Sewer Constructed 1900 1919	6
Sewer Constructed Before 1900	2
Inaccessible Sewer (Miles)	80
Sewer Clean Production (Miles/Yr)	207
Gravity Sewer Inspection (Miles/Yr)	25

(*) The information presented above was provided by the Enrollee in the Collection System Questionnaire. Enrollees are required to update the questionnaire information at least once a year; therefore, the information presented above may not be the most current.

Sewer System Management Plan (SSMP) Completion (*)

SSMP Information: Redding City CS

Task and Associated Section	Completed
Development Plan and Schedule	Yes
Section I - Goal	Yes
Section II - Organization	Yes
Section III - Legal Authority	Yes
Section IV - Operation & Maintenance Program	Yes
Section V - Design & Performance Provisions	Yes
Section VI - Overflow Emergency Response Plan	Yes
Section VII - FOG Control Program	Yes
Section VIII - System Evaluation & Capacity Assurance Plan	Yes
Section IX - Monitoring, Measurement, and Program Modifications	Yes
Section X - SSMP Program Audits	Yes
Section XI - Communication Program	Yes
Complete SSMP Implementation	Yes

(*) Under the Statewide General WDRs for Sanitary Sewer Systems, WQO No. 2006-0003, enrollees are required to develop and implement a written Sewer system Management Plan (SSMP) and must make it publicly available. The SSMP must be approved by the deadlines in the SSMP Time Schedule presented in the Sanitary Sewer Systems WDR.

Additional Information:

- Data used for the Operational report is reported by the enrollees through the CIWQS (California Integrated Water Quality System) SSO module.

- Indices are calculated for the date range specified (default is past 4 months) and using data available since reporting was required for all enrollees as specified in the Sanitary Sewer Systems WDR. Reporting was required to begin for Regions 4,8,9 on 1/2/2007, Regions 1,2,3 on 5/2/2007, and, Regions 5,6,7 on 9/2/2007.
- Comparisons are made between similar collection systems type (e.g. Municipal), and lateral responsibility for the entire state and region. Indices are calculated for all similar collection systems and averaged for comparison.
- Category 1 spills are required to be fully certified 15 calendar days after SSO response conclusion and Category 2 spills are required to be fully certified 30 Calendar days after end of calendar month which SSO occurred. Therefore, spill records for the past approximately 60 days may be incomplete.
- Average Number of Spills per 100 miles: Measures the number of sewer overflows per 100 miles of sewer lines. Notice that these indices are strongly influenced by the length of collection system owned by the enrollee.
 - For instance, an enrollee that owns and operates a collection system of one (1) mile in length having only one (1) spill (analyzing data for ONE year) will have a Operational indice of 100.0 spills/100mi/yr. On the other hand, an enrollee that owns and operates a collection system of one hundred (100) miles in length having only one (1) spill (analyzing data for ONE year) will have a Operational indice of 1.0 spills/100mi/yr.
- Average Net Volume (volume spilled minus volume recovered) of Spills per Capita: Measures the volume in gallons of SSOs, for which the reporting Enrollee is responsible, per capita (the population served by your agency's sanitary sewer system). Where the volume recovered is greater than the volume spilled, the net volume will be considered to be zero.
- The "agency" or Enrollee listed on a SSO report is responsible for the data presented in this report and should be contacted directly for questions related to their Data.
- More information on the Sanitary Sewer Overflow Reduction program is available at: http://www.waterboards.ca.gov/water_issues/programs/sso/index.shtml
- The Sanitary Sewer Overflows Incident Map is available at: http://www.waterboards.ca.gov/water_issues/programs/sso/sso_map/sso_pub.shtml
- The Interactive SSO report: https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main

The current report was generated with data as of: Monday, August 01, 2011
Regional Boards are in the process of entering backlogged data.
As a result, data may be incomplete.
Reports are constructed from all entered data as of the close of business the previous day.

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ATTACHMENT C: City of Redding “No Spill Certifications” and SSMP Certifications



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SSO - SSO No Spill Certification Search [?](#) [SSO Menu](#)

Regional Water Board:

Agency:

Sanitary Sewer System:

WDID:

Enter any search criteria and click "Search".

Confirmation Number:

For the Month/Year From: - Select Month - Year:

For the Month/Year To: - Select Month - Year:

Sanitary Sewer System:

Agency:

Regional Water Board:

Search Results:

[Previous](#) | 1-10 of 14 | | [Next](#) [4](#)

Confirmation Number	Certification for the Month of	Certified By	Entered Date/Time	Sanitary Sewer System	Agency	Regional Board
2289978	May 2011	Josh Keener	2011-6-3.11.44. 5. 0	Redding City CS	Redding City	5R
2243221	May 2010	Josh Keener	2010-6-1.9.20. 4. 0	Redding City CS	Redding City	5R
2239755	April 2010	Josh Keener	2010-5-3.12.18. 54. 0	Redding City CS	Redding City	5R
2235867	March 2010	Josh Keener	2010-4-1.14.43. 53. 0	Redding City CS	Redding City	5R
2212437	October 2009	Dwayne Norman	2009-11-5.7.49. 38. 0	Redding City CS	Redding City	5R
2212438	October 2009	Dwayne Norman	2009-11-5.7.49. 38. 0	Redding City CS	Redding City	5R
2206703	September 2009	Dwayne Norman	2009-10-5.12.35. 15. 0	Redding City CS	Redding City	5R
2200133	August 2009	Dwayne Norman	2009-9-1.14.52. 7. 0	Redding City CS	Redding City	5R
2194982	July 2009	Dwayne Norman	2009-8-6.14.20. 58. 0	Redding City CS	Redding City	5R
2186782	June 2009	Dwayne Norman	2009-7-14.9.14. 5. 0	Redding City CS	Redding City	5R



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SSO - SSO No Spill Certification Search ? | [SSO Menu](#)

Regional Water Board:

Agency:

Sanitary Sewer System:

WDID:

Enter any search criteria and click "Search".

Confirmation Number:

For the Month/Year From: Year:

For the Month/Year To: Year:

Sanitary Sewer System:

Agency:

Regional Water Board:

Search Results:

[Previous 10](#) | | [Next](#)

Confirmation Number	Certification for the Month of	Certified By	Entered Date/Time	Sanitary Sewer System	Agency	Regional Board
825363	April 2009	Dwayne Norman	2009-5-5.9.29. 44. 0	Redding City CS	Redding City	5R
789890	July 2008	Dwayne Norman	2008-8-6.7.49. 51. 0	Redding City CS	Redding City	5R
713947	December 2007	John Tasello	2008-1-8.9.52. 38. 0	Redding City CS	Redding City	5R
705791	November 2007	John Tasello	2007-12-22.9.25. 45. 0	Redding City CS	Redding City	5R



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SSO - Sewer System Management Plan (SSMP) [?](#) [SSO Menu](#)

Regional Water Board: 5R
 Agency: Redding City
 Sanitary Sewer System: Redding City CS
 WDID: 5SSO10801

Last Updated:

SSMP Element	Certification Date
Development Plan and Schedule	<input type="text" value="10/26/2007"/> (Date Format: MM/DD/YYYY)
Section I - Goal	<input type="text" value="11/02/2007"/> (Date Format: MM/DD/YYYY)
Section II - Organization	<input type="text" value="11/02/2007"/> (Date Format: MM/DD/YYYY)
Section III - Legal Authority	<input type="text" value="05/02/2009"/> (Date Format: MM/DD/YYYY)
Section IV - Operation & Maintenance Program	<input type="text" value="05/02/2009"/> (Date Format: MM/DD/YYYY)
Section V - Design & Performance Provisions	<input type="text" value="05/02/2009"/> (Date Format: MM/DD/YYYY)
Section VI - Overflow Emergency Response Plan	<input type="text" value="05/02/2009"/> (Date Format: MM/DD/YYYY)
Section VII - FOG Control Program	<input type="text" value="05/02/2009"/> (Date Format: MM/DD/YYYY)
Section VIII - System Evaluation & Capacity Assurance Plan	<input type="text" value="06/22/2009"/> (Date Format: MM/DD/YYYY)
Section IX - Monitoring, Measurement, and Program Modifications	<input type="text" value="06/22/2009"/> (Date Format: MM/DD/YYYY)
Section X - SSMP Program Audits	<input type="text" value="06/22/2009"/> (Date Format: MM/DD/YYYY)
Section XI - Communication Program	<input type="text" value="06/22/2009"/> (Date Format: MM/DD/YYYY)
Complete SSMP Implementation	<input type="text" value="06/22/2009"/> (Date Format: MM/DD/YYYY)
Note: 'Complete SSMP Implementation' is only available for input only if all its above sections filled.	
Note: The Certification Note and Certified By fields disappear after certifying your SSMP. Previous entries can be seen on the Historic SSMP information screen.	
Certification Note:	<input type="text"/>
5-Year Update	<input type="text"/> (Date Format: MM/DD/YYYY)

[Historic](#)

ATTACHMENT D: City of Redding Collection System Questionnaire



Navigate to:
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SSO - Questionnaire ? | [SSO Menu](#)

Regional Water Board: 5R
Agency: Redding City
Sanitary Sewer System: Redding City CS
WDID: 5SSO10801

Collection System Questionnaire

Save

Note: All questions are required to be answered. Enter N/A for questions that do not apply.

Last successfully updated: 2011-03-07

Collection System Questionnaire ?

1) Sanitary Sewer System Category:

2) What is the population served by your agency's sanitary sewer system?

3) What is your current annual operation and maintenance budget for sanitary sewer system facilities?

4) What is your current annual capital expenditure budget for sanitary sewer system facilities?

Please identify the total number of employees (technical and mechanical) for your agency's sanitary sewer system (including pump station operations) working within the different classifications listed below.

5) Entry Level (Less than 2 years experience)
 Number of agency employees?

6) Journey Level (Greater than or equal 2 years experience)
 Number of agency employees?

7) Supervisory Level
 Number of agency employees?

8) Managerial Level
 Number of agency employees?

Please identify the total number of employees who hold CWEA Certification for Collection System Maintenance and/or Plant Maintenance-Includes Mechanical Technologist and Electrical/Instrumentation for your agency's sanitary sewer system (including pump station operations) for the various Certificates and Grades levels listed below.

9) Grade I

Number of certified (Grade I Collection System Maintenance) agency employees:

Number of certified (Grade I Plant Maintenance Technologist) agency employees?

10) Grade II

Number of certified (Grade II Collection System Maintenance) agency employees:

Number of certified (Grade II Electrical/Instrumentation Technologist) agency employees:

Number of certified (Grade II Mechanical Technologist) agency employees:

11) Grade III

Number of certified (Grade III Collection System Maintenance) agency employees:

Number of certified (Grade III Electrical/Instrumentation Technologist) agency employees:

Number of certified (Grade III Mechanical Technologist) agency employees:

12) Grade IV

Number of certified (Grade IV Collection System Maintenance) agency employees:

Number of certified (Grade IV Electrical/Instrumentation Technologist) agency employees:

Number of certified (Grade IV Mechanical Technologist) agency employees:

13) How many miles of forced mains and other pressure systems?

14) How many miles of gravity sewers?

15) Estimated total miles of laterals (upper and lower)?

16) Which portion of laterals is your agency responsible for?

(If the answer of question-15 is None, no need to answer for question-16)

17) Estimated total miles of laterals your agency is responsible for?

18) Number of service lateral connections?

19) Approximately, what percentage of your sanitary sewer system was constructed between the years of:
(note: total must sum to 100%)

%, 2000 - Present

%, 1980 - 1999

%, 1960 - 1979

%, 1940 - 1959

%, 1920 - 1939

%, 1900 - 1919

%, Before 1900

20) Estimated total miles of your sanitary sewer system not accessible by vehicle?

21) What is your total gravity sewer system cleaning production in miles/year?

22) What is your total gravity sewer system condition inspection (e.g., CCTV) production in miles/year?

Note: All questions are required to be answered.

[Export Questionnaire History To Excel](#)

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ATTACHMENT E: City of Redding Noncompliance Email Reminders

SBSSO - URGENT for Redding City CS (5SSO10801) : SSO Compliance - Best viewed in HTML.

From: <sbsso@waterboards.ca.gov>
To: <jvandiver@ci.redding.ca.us>, <jkeener@ci.redding.ca.us>, <rb5sso@waterboards.ca.gov>, <sbsso@waterboards.ca.gov>
Date: 12/2/2010 9:02 AM
Subject: URGENT for Redding City CS (5SSO10801) : SSO Compliance - Best viewed in HTML.

TO: LEGALLY RESPONSIBLE OFFICIALS (LROs) and DATA SUBMITTERS (DSs) ENROLLED UNDER THE STATEWIDE SANITARY SEWER SYSTEMS WDR (WATER QUALITY ORDER 2006-0003-DWQ)

This is an auto-generated CIWQS e-mail alert compliance reminder. Your State Water Board CIWQS records indicate that your collection system is enrolled under the Statewide Sanitary Sewer System Waste Discharge Requirements (Order No. 2006-0003-DWQ). We have noted the following deficiencies in the CIWQS database system. Please review your compliance with the Order and address the deficiencies listed below within the next 90 days. The Water Boards reserve their rights to pursue any enforcement action authorized by law (see Water Code sections 13350, 13268, et al.).

* The last update of your collection system questionnaire was on 12-NOV-09. It is older than 1 year, so you should update the questionnaire form as soon as possible. Otherwise, the system blocks you from reporting spills, no-spill certifications, and certify SSMP.

* Your collection system needs to report the spill(s) or No-Spill certification(s) for sep-07, Note: Your collection system still has to report a no-spill certification for a month if all reported spills for that month are Private Lateral spills.

* Your Collection System is required to certify the following spill(s): 656783, 729815, 716831, 731487, 726597, 730954, 731259, if you contend that a spill entry is erroneous or a duplicate and should be deleted, send an email to the CIWQS Help Center (CIWQS@waterboards.ca.gov) with an explanation for each spill of why the spill entry is erroneous and should be deleted or provide the number of the duplicate spill. Once corrected, you may also need to file a no-spill certification for the month where the erroneous or a duplicate spill occurred.

* Your Collection System has spill(s): 747268, 724780, 716831, 724287, 718946, 717019, 713952, whose data was mis-reported in one or more of the following ways:

1. The "spill volume recovered" is greater than the "spill volume" (the "spill volume recovered" must be less than or equal the volume of the spill) OR
2. The "spill volume reached surface water" is greater than the "spill volume" (the "spill volume reached surface water" must be less than or equal the volume of the spill), OR
3. You selected "spill reached surface water" = yes but indicated the "volume reached surface water" = 0 or you did not provide the impacted surface water body name in the "surface water impacted" field, OR
4. You selected "spill reached surface water" = no but indicated the "volume reached surface water" was greater than 0 or you provided the impacted surface water body name in the "surface water impacted" field.

Please correct the spill report(s) by amending and re-certifying them.

To update your user information, including email, please log-into CIWQS and then click VIEW/CHANGE MY PERSONAL INFORMATION and MY EMAIL ADDRESS to change as

necessary. Select SAVE CHANGES before exiting the screen.

For more information about the Statewide Sanitary Sewer Systems WDR, please visit:
http://www.swrcb.ca.gov/water_issues/programs/sso/

To assist you with learning more about SSO electronic reporting, please view the SSO Discharger Workbook at: http://www.waterboards.ca.gov/water_issues/programs/sso/docs/discharger_workbook.pdf

For training resources on Electronic Reporting and Sewer System Management Plans (SSMP), visit California Water Environment at: <http://www.cwea.org/et-ssowdr.shtml>

If you are not the Sewer System Overflow Program Contact for your agency and do not need to receive this type of email in the future, or for questions or help regarding email, enrollment or technical database help, contact our CIWQS Help Line staff at:

866-79-CIWQS (24977)

M - F (8am-5pm)

Email:sbssso@waterboards.ca.gov

For technical program and other questions related to the Statewide Sanitary Sewer Systems WDR, please contact:

Victor Lopez

Division of Water Quality / Statewide SSO Program

vlopez@waterboards.ca.gov (916) 323-5511

SBSSO - EMAIL REMINDER for Redding City CS (5SSO10801) : SSO Compliance - Best viewed in HTML.

From: <sbsso@waterboards.ca.gov>
To: <jkeener@ci.redding.ca.us>, <jvandiver@ci.redding.ca.us>, <sbsso@waterboards.ca.gov>
Date: 1/31/2011 2:07 PM
Subject: EMAIL REMINDER for Redding City CS (5SSO10801) : SSO Compliance - Best viewed in HTML.

TO: LEGALLY RESPONSIBLE OFFICIALS (LROs) ENROLLED UNDER THE STATEWIDE SANITARY SEWER SYSTEMS WDR (WATER QUALITY ORDER 2006-0003-DWQ)

This is a follow up email reminder for the auto-generated CIWQS compliance e-mail reminder sent on December 2, 2010.

Your State Water Board CIWQS records indicate that your collection system is enrolled under the Statewide Sanitary Sewer System Waste Discharge Requirements (Order No. 2006-0003-DWQ). Below are remaining outstanding issues identified in the CIWQS database system. Please use this email reminder as your main guide to resolve the issues identified below (disregard issues identified in the previous e-mail). Please review and address the deficiencies listed below within the next 45 days. Additional follow up e-mail reminders will be sent and will identify any outstanding issues remaining at the time the e-mail reminder is sent.

* Your collection system needs to report the spill(s) or No-Spill certification(s) for sep-07, Note: Your collection system still has to report a no-spill certification for a month if all reported spills for that month are Private Lateral spills.

* Your Collection System is required to certify the following spill(s): 731487, 726597, 731259, 729815, 730954, 656783, if you contend that a spill entry is erroneous or a duplicate and should be deleted, send an email to the CIWQS Help Center (CIWQS@waterboards.ca.gov) with an explanation for each spill of why the spill entry is erroneous and should be deleted or provide the number of the duplicate spill. Once corrected, you may also need to file a no-spill certification for the month where the erroneous or a duplicate spill occurred.

Note: To certify Category 1 spills where the OES-Control-Number and OES-Called-Date/Time are unknown, enter "000000" and "11/11/1111" for each field, respectively.

To update your user information, including email, please log-into CIWQS and then click **VIEW/CHANGE MY PERSONAL INFORMATION** and **MY EMAIL ADDRESS** to change as necessary. Select **SAVE CHANGES** before exiting the screen.

For more information about the Statewide Sanitary Sewer Systems WDR, please visit:
http://www.swrcb.ca.gov/water_issues/programs/sso/

To assist you with learning more about SSO electronic reporting, please view the SSO Discharger Work Book at: http://www.waterboards.ca.gov/water_issues/programs/sso/docs/discharger_workbook.pdf

For training resources on Electronic Reporting and Sewer System Management Plans (SSMP), visit California Water Environment at: <http://www.cwea.org/et-ssowdr.shtml>

If you are not the Sewer System Overflow Program Contact for your agency and do not need to receive this type of email in the future, or for questions or help regarding email, enrollment or technical database help, contact our CIWQS Help Line staff at:

866-79-CIWQS (24977)

M - F (8am-5pm)

Email: ciwqs@waterboards.ca.gov

For technical program and other questions related to the Statewide Sanitary Sewer Systems WDR, please contact:

Victor Lopez

Division of Water Quality / Statewide SSO Program

vlopez@waterboards.ca.gov (916) 323-5511

ATTACHMENT F: NOV and Administrative Civil Liability (ACL) compliant for Jenny Creek



California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, P.E., Chair.



Linda S. Adams
Secretary for
Environmental Protection

Redding Office
415 Knollcrest Drive, Suite 100, Redding, California 96002
(530) 224-4845 • Fax (530) 224-4857
<http://www.waterboards.ca.gov/centralvalley>

Arnold Schwarzenegger
Governor

NOTICE OF VIOLATION

18 October 2007

CERTIFIED MAIL

7004 1160 0001 6957 1796

Mr. Dennis McBride
Municipal Utilities Director
City of Redding
P.O. Box 496071
Redding, CA 96049-6071

WATER CODE SECTION 13267 REQUEST FOR TECHNICAL REPORTS, NOTICE OF VIOLATION, NPDES ORDER NO. R5-2003-0130 & GENERAL SANITARY SEWER ORDER NO. 2006-0003, CITY OF REDDING, SANITARY SEWER OVERFLOW AT JENNY CREEK, SHASTA COUNTY

Regional Water Quality Control Board (Regional Water Board) staff inspected a sanitary sewer overflow (SSO) from the City of Redding's (Redding's) collection system, in the vicinity of Overhill Drive, on 15 October 2007. The SSO reached Jenny Creek and the Sacramento River. A preliminary estimate of the volume of the SSO is 20,000 gallons, none of which was recovered.

The SSO is a violation of the waste discharge requirements regulating Redding's wastewater treatment plants, and its collection systems. Pursuant to the California Water Code (CWC), Section 13385, you could be subject to civil liability in the amount of ten thousand dollars (\$10,000) to twenty-five thousand dollars (\$25,000) for each day in which the discharge to surface waters occurred, and additionally ten dollars (\$10) to twenty-five dollars (\$25) for each gallon discharged and not cleaned up, in excess of 1,000 gallons. This matter is being referred to the Executive Officer of the Regional Water Board for consideration of further enforcement action.

During the inspection of the SSO, Regional Water Board staff observed that a significant portion of the above-ground collection system appeared to be dilapidated, and in need of replacement. Due to the apparent condition of the collection system, its proximity to Jenny Creek and the Sacramento River, and the presence of municipal water source intakes downstream, a unique and serious threat to water quality and public health exists. Therefore, pursuant to the CWC, Section 13267, we require that you submit the following technical reports:



Technical Report #1:

A technical report describing the cause and response to the SSO, water quality sampling results, and the last date of inspection of the subject sewer line. Technical Report #1 shall be submitted to the Regional Water Board **by 30 October 2007**.

Technical Report #2:

A technical report describing an immediate inspection of the collection system in the vicinity of the SSO shall be submitted to the Regional Water Board **by 2 November 2007**. At a minimum, all above-ground sewer line of similar age, construction, and condition to the section of sewer line that failed at the SSO shall be included. Inspection of sections of the collection system in close proximity to surface waters, or surface water drainage courses shall be conducted first. The inspection shall include a physical, non-invasive inspection including the use of electronic inspection methods (such as ultrasonic), as appropriate.

Technical Report #3:

A technical report including a prioritized list, and time schedule for interim repair of unacceptable sections of the collection system, based on the results of the collection system inspection described in Technical Report #2, shall be submitted to the Regional Water Board **by 9 November 2007**. The technical report shall also include preliminary plans for the permanent replacement of the collection system in the Overhill Drive area.

Due to the time-sensitive nature of the situation, and the pending information to be reported, it is recognized that it may be appropriate to modify these requests in the future. The technical reports requested above are necessary to evaluate and mitigate the threat to water quality and public health posed by the collection system.

If you have any questions regarding the above information, please contact Stacy Gotham of my staff at (530) 224-4993 or at the letterhead address above.

JAMES C. PEDRI, P.E.
Assistant Executive Officer

SSG: sae

cc: John Tasello, City of Redding, Wastewater Collection Supervisor, Redding
Stuart Zanni, City of Redding, Industrial Waste Division, Redding
Kurt Starman, City of Redding Manager, Redding
California Department of Fish and Game, Redding
James Smith, Shasta County Department of Resource Management, Environmental
Health Division, Redding
Mike McNamara, Department of Health Services, Division of Drinking Water, Redding



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2009-0519
IN THE MATTER OF

CITY OF REDDING
JENNY CREEK ELEVATED SANITARY TRUNK SEWER
SHASTA COUNTY

This Complaint is issued to the City of Redding (hereafter Discharger) pursuant to California Water Code (CWC) section 13385, which authorizes the imposition of Administrative Civil Liability, CWC section 13323, which authorizes the Executive Officer to issue this Complaint, and CWC section 7, which authorizes the delegation of the Executive Officer's authority to a deputy, in this case the Assistant Executive Officer. This Complaint is based on findings that the Discharger discharged waste to waters of the United States without a permit.

The Assistant Executive Officer of the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board or Board) finds the following:

1. The Discharger owns and operates the City of Redding Clear Creek Wastewater Treatment Facility (WWTF) and accompanying collection, treatment and disposal systems, which provides sewerage service to a portion of the City of Redding. Treated municipal wastewater is discharged to the Sacramento River, a water of the United States.
2. On 5 September 2003, the Central Valley Water Board adopted WDRs Order R5-2003-0130 to regulate discharges of wastewater from the WWTF. The Discharger owns and maintains approximately 400 miles of pipeline for the collection of raw sewage and conveyance to two Discharger-owned treatment facilities, including the subject WWTF.
3. On 2 May 2006, the State Water Board issued Order 2006-0003-DWQ, Statewide General WDRs for Sanitary Sewer Systems (Sanitary Sewer General Order). The Sanitary Sewer General Order contains, among other items, sanitary sewer overflow (SSO) requirements including monitoring and reporting requirements, Sewer System Management Plan (SSMP) requirements, and an implementation time schedule.
4. On 30 October 2006 the Discharger enrolled its sewer collection system under the Sanitary Sewer General Order. The Discharger is required to operate and maintain its sewage collection system to prevent sanitary sewer overflows and spills in compliance with requirements of the Sanitary Sewer General Order and WDRs Order R5-2003-0130.

Raw Sewage Spills

5. On 15 October 2007, the Discharger reported that between 20,000 and 64,000 gallons of raw sewage discharged from the sanitary sewer collection system to a surface water body, Jenny Creek, in Shasta County. Jenny Creek is tributary to the Sacramento River, a water of the United States. The raw sewage discharged to Jenny Creek resulted from

the collapse of a 30-foot section of an elevated, 12-inch steel wrapped pipe. The sewage combined with ambient flows in Jenny Creek and could not be cleaned up once it entered the creek.

6. The 15 October 2007 sewage spill occurred within a secluded greenbelt located between Overhill Drive and Sunset Drive, north of Eureka Way in Redding. The elevated sanitary trunk sewer line (built in 1958) runs along Jenny Creek for approximately 2400 feet, ending at the Mary Street Lift Station. The original spill report to the Discharger was received at 1:15 p.m. on 15 October 2007. A resident on Sunset Drive arrived home to hear rushing water in his backyard. After investigating the noise, he saw the broken sewer line. The resident did not recall hearing the rushing water earlier that morning when he left for work. The Discharger reported that a bypass pumping system that stopped the discharge was up and running by 3:40 p.m. Temporary repairs to the pipeline were completed by 6 p.m. on 15 October 2007. The Discharger reported that the volume of the spill was between 20,155 gallons (2 hours & 25 minutes of discharge) and 63,940 gallons (7 hours & 40 minutes of discharge). A more accurate number could not be reached, due to the fact that the exact duration of the spill is unknown.
7. Once the 15 October 2007 spill was identified, the Discharger provided a timely initial notification to the California Office of Emergency Services and other state and local agencies including the Central Valley Water Board. The Discharger also issued a press release soon after the spill was discovered. Central Valley Water Board staff responding to the scene on 15 October 2007 noted significant Discharger resources responding to the incident. The Discharger initiated a sampling program to assess impacts of the discharge, and requested Board staff's input on this effort and follow-up sampling requirements. The Discharger posted warning signs along Jenny Creek, from the discharge point along to the Sacramento River and along the Sacramento River Trail.
8. Field observations and laboratory results from water samples collected by both City staff and Central Valley Water Board staff indicated impacts to Jenny Creek. Further, water quality sampling results showed elevated concentrations of fecal coliform (above background concentrations and in exceedance of Basin Plan Objectives) in Jenny Creek for approximately two months after the spill. Elevated fecal coliform concentrations were observed at multiple locations throughout Jenny Creek for a distance of approximately 3,500 feet downstream of the discharge point.
9. On 18 October 2007, the Central Valley Water Board issued a Notice of Violation (NOV) to the Discharger for the sanitary sewer overflow to Jenny Creek. The NOV required the Discharger to submit 1) a technical report detailing the cause and response to the spill, 2) a technical report detailing an immediate inspection of the elevated collection system in the Jenny Creek drainage, and 3) a technical report containing a priority list and time schedule for interim repairs of unacceptable sections of sewer lines in the area. The discharger had inspected the elevated section of pipe in March 2007 and made numerous repairs with either cement grout or syntho-glass wrap.

10. On 22 October 2007, after reviewing water quality monitoring data that showed a high fecal Coliform bacteria count in Jenny Creek above the spill site, Central Valley Water Board staff and City staff discovered another leak in the elevated sewer collection pipe approximately 300 feet west of the spill site (upstream). This sewage leak also combined with ambient flows in Jenny Creek and could not be cleaned up once it entered the creek. Water quality sampling results in Jenny Creek indicated bacteria levels that exceeded Basin Plan Objectives (fecal coliform reported at 500 MPN/100mL to >160000 MPN/mL). The leak was estimated at 2 gallons per minute, for an unknown duration. Repairs to this section of piper were made immediately. The Discharger reported the volume of the second spill to Jenny Creek to be 2420 gallons.

11. CWC section 13376 states, in relevant part:

Any person discharging pollutants or proposing to discharge pollutants to the navigable waters of the United States ... shall file a report of the discharge in compliance with the procedures set forth in Section 13260... The discharge of pollutants...except as authorized by waste discharge requirements [NPDES permit]...is prohibited.

12. CWC section 13385 states, in relevant part:

(a) Any person who violates any of the following shall be liable civilly in accordance with this section:

- (1) Section 13375 or 13376.
- (2) Any waste discharge requirements...issued pursuant to this chapter...

- (5) Any requirements of Section 301, 302, 306, 307,308, 318, 401, or 405 of the Clean Water Act, as amended.

(c) Civil liability may be imposed administratively by the state board or a regional board pursuant to Article 2.5 (commencing with Section 13323) of Chapter 5 in an amount not to exceed the sum of both of the following:

- (1) Ten thousand dollars (\$10,000) for each day in which the violation occurs.
- (2) Where there is a discharge, any portion of which is not susceptible to cleanup or is not cleaned up, and the volume discharged but not cleaned up exceeds 1,000 gallons, an additional liability not to exceed ten dollars (\$10) multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons.

(e) In determining the amount of any liability imposed under this section, the regional board, the state board, or the superior court, as the case may be, shall take into account the nature, circumstances, extent, and gravity of the violation or violations, whether the discharge is susceptible to cleanup or abatement, the degree of toxicity of the discharge, and, with respect to the violator, the ability to pay, the effect on its ability to continue its business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violation, and other matters that justice may require. At a minimum, liability shall be assessed at a level that recovers the economic benefits, if any, derived from the acts that constitute the violation.”

13. **Minimum Civil Liability.** Pursuant to CWC section 13385(e), at a minimum, administrative civil liability charged under this section must be equivalent to the economic benefit that the Discharger gained by not implementing management and physical improvements necessary to prevent the discharge. In May 2006, the Discharger’s consultant submitted a report that indicated the Jenny Creek elevated sanitary trunk sewer “was in extremely poor condition and needed to either be rehabilitated or replaced.” In the summer of 2007, the Discharger began to plan and design a new force main and lift station that would reroute flows away from the Jenny Creek existing elevated sanitary truck sewer. The City was well aware of the poor condition of the elevated trunk sewer and the severity of the discharge could have been prevented through adequate inspections and/or the early replacement of the fifty-year old piping. The Discharger reported that they expended \$137,123 as a result of this spill including labor, pipe replacement and water quality sampling. Although they spent monies repairing the damage following the spill, they had an economic savings conservatively estimated at \$25,000 by not replacing the elevated trunk sewer sooner or by not establishing an inspection program after they received information indicating that the line was in extremely poor condition.
14. **Maximum Civil Liability.** Pursuant to CWC section 13385(c), the maximum administrative civil liability in this case may be assessed at \$10,000 per violation per day plus ten (\$10) dollars per gallon discharged that is not cleaned up minus one thousand gallons. Based on Findings 5 through 10 above there were at minimum two days of violations. The combined maximum assessment for the two spills is between **two hundred twenty-five thousand, seven hundred fifty dollars (\$225,750)** (((\$10,000 per day x 2 days) plus ((20,155 -1000)+(2420-1000)) x \$10 per gallon) and **six hundred sixty-three thousand, three hundred dollars (\$663,600)** (((\$10,000 per day x 2 days) plus ((63,940-1000)+(2420-1000)) x \$10 per gallon), depending on which value is used for the volume of the 15 October 2007 spill.
15. Issuance of this Administrative Civil Liability Complaint to enforce CWC Division 7, Chapter 5.5 is exempt from the provisions of the California Environmental Quality Act (Public Resources Code Section 21000, et. seq.), in accordance with Title 14 California Code of Regulations, Enforcement Actions by Regulatory Agencies, Section 15321(a)(2).

THE CITY OF REDDING IS HEREBY GIVEN NOTICE THAT:

1. The Executive Officer of the Central Valley Water Board proposes that the Discharger be assessed Administrative Civil Liability in the amount of eighty two thousand, five hundred dollars (\$82,500).
2. A hearing on this matter will be conducted at the Central Valley Water Board meeting scheduled on 11/12 June 2009, unless the Discharger does either of the following by **15 April 2009**:
 - a) Waives the hearing by completing the attached form (checking off the box next to item #4) and returning it to the Central Valley Water Board, along with payment for the proposed civil liability of eighty two thousand, five hundred dollars (**\$82,500**); or
 - b) Agrees to enter into settlement discussions with the Central Valley Water Board and requests that any hearing on the matter be delayed by signing the enclosed waiver (checking off the box next to item #5) and returning it to the Central Valley Water Board along with a letter describing issues to be discussed in settlement negotiations, including compliance project proposals.
3. If a hearing on this matter is held, the Central Valley Water Board will consider whether to affirm, reject, or modify the proposed Administrative Civil Liability, or whether to refer the matter to the Attorney General for recovery of judicial civil liability.

original signed by

JAMES C. PEDRI, Assistant Executive Officer

15 October 2009

(Date)

**WAIVER OF 90-DAY HEARING REQUIREMENT FOR
ADMINISTRATIVE CIVIL LIABILITY COMPLAINT**

By signing this waiver, I affirm and acknowledge the following:

1. I am duly authorized to represent the City of Redding (hereinafter "Discharger") in connection with Administrative Civil Liability Complaint R5-2009-0519 (hereinafter the "Complaint");
2. I am informed that California Water Code section 13323, subdivision (b), states that, "a hearing before the regional board shall be conducted within 90 days after the party has been served" with the Complaint;"
3. I hereby waive any right the Discharger may have to a hearing before the Central Valley Regional Water Quality Control Board (Central Valley Water Board) within ninety (90) days of service of the Complaint; and
4. **(Check here if the Discharger will waive the hearing requirement and will pay the fine)**
 - a. I certify that the Discharger will remit payment for the proposed civil liability in the amount of eighty two thousand, five hundred dollars (\$82,500) by check, which will contain a reference to "ACL Complaint R5-2009-0519" and will be made payable to the "State Water Pollution Cleanup and Abatement Account." Payment must be received by the Central Valley Water Board by **15 April 2009** or this matter will be placed on the Central Valley Water Board's agenda for adoption at the **11/12 June 2009** Central Valley Water Board meeting.
 - b. I understand the payment of the above amount constitutes a settlement of the Complaint, and that any settlement will not become final until after the 30-day public notice and comment period mandated by Federal regulations (40 CFR 123.27) expires. Should the Central Valley Water Board receive new information or comments during this comment period, the Central Valley Water Board's Assistant Executive Officer may withdraw the complaint, return payment, and issue a new complaint. New information or comments include those submitted by personnel of the Central Valley Water Board who are not associated with the enforcement team's issuance of the Complaint.
 - c. I understand that payment of the above amount is not a substitute for compliance with applicable laws and that continuing violations of the type alleged in the Complaint may subject the Discharger to further enforcement, including additional civil liability.

-or-

5. **(Check here if the Discharger will waive the 90-day hearing requirement, but will not pay at the current time. The Central Valley Water Board must receive information from the Discharger indicating a controversy regarding the assessed penalty at the time this waiver is submitted, or the waiver may not be accepted.)** I certify that the Discharger will promptly engage the Central Valley Water Board staff in discussions to resolve the outstanding violation(s). By checking this box, the Discharger is *not* waiving its right to a hearing on this matter. By checking this box, the Discharger requests that the Central Valley Water Board delay the hearing so that the Discharger and Central Valley Water Board staff can discuss settlement. It remains within the discretion of the Central Valley Water Board to agree to delay the hearing. A hearing on the matter may be held before the Central Valley Water Board if these discussions do not resolve the liability proposed in the Complaint. The Discharger agrees that this hearing may be held after the 90-day period referenced in California Water Code section 13323 has elapsed.
6. If a hearing on this matter is held, the Central Valley Water Board will consider whether to issue, reject, or modify the proposed Administrative Civil Liability Order, or whether to refer the matter to the Attorney General for recovery of judicial civil liability. Modification of the proposed Administrative Civil Liability Order may include increasing the dollar amount of the assessed civil liability.

(Print Name and Title)

(Signature)

(Date)

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

ADMINISTRATIVE CIVIL LIABILITY ORDER R5-2009-0549
IN THE MATTER OF

CITY OF REDDING
JENNY CREEK ELEVATED SANITARY TRUNK SEWER
SHASTA COUNTY

This Order is issued to the City of Redding (hereafter Discharger) pursuant to California Water Code (CWC) section 13385, which authorizes the imposition of Administrative Civil Liability (ACL). This Order is based on findings that the Discharger discharged waste to waters of the United States without a permit.

The Executive Officer of the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board or Board) finds, with respect to the Discharger's act, or failure to act, the following:

1. The Discharger owns and operates the City of Redding Clear Creek Wastewater Treatment Facility (WWTF) and accompanying collection, treatment and disposal systems, which provide sewerage service to a portion of the City of Redding. Treated municipal wastewater is discharged to the Sacramento River, a water of the United States.
2. On 5 September 2003, the Central Valley Water Board issued WDRs Order R5-2003-0130 to regulate discharges of wastewater from the WWTF. The Discharger owns and maintains approximately 400 miles of pipeline for the collection of raw sewage and conveyance to two Discharger-owned treatment facilities, including the subject WWTF.
3. On 2 May 2006, the State Water Board issued Order 2006-0003-DWQ, Statewide General WDRs for Sanitary Sewer Systems (Sanitary Sewer General Order). The Sanitary Sewer General Order contains, among other items, sanitary sewer overflow (SSO) requirements including monitoring and reporting requirements, Sewer System Management Plan (SSMP) requirements, and an implementation time schedule.
4. On 30 October 2006 the Discharger enrolled its sewer collection system under the Sanitary Sewer General Order. The Discharger is required to operate and maintain its sewage collection system to prevent sanitary sewer overflows and spills in compliance with requirements of the Sanitary Sewer General Order and WDRs Order R5-2003-0130.
5. On 19 March 2009, the Assistant Executive Officer issued the Discharger Administrative Civil Liability Complaint R5-2009-0519 (Complaint), which charged the Discharger with Administrative Civil Liability in the amount of \$82,500, pursuant to CWC section 13385. The amount of the liability for the discharge violations was established based upon a review of the factors cited in CWC section 13385 and the State Water Resources Control Board (State Water Board) Water Quality Enforcement Policy.

Raw Sewage Spills

6. On 15 October 2007, the Discharger reported that between 20,000 and 64,000 gallons of raw sewage discharged from the sanitary sewer collection system to a surface water body, Jenny Creek, in Shasta County. Jenny Creek is tributary to the Sacramento River, a water of the United States. The raw sewage discharged to Jenny Creek resulted from the collapse of a 30-foot section of an elevated, 12-inch steel wrapped pipe. The sewage combined with ambient flows in Jenny Creek and could not be cleaned up once it entered the creek.
7. The 15 October 2007 sewage spill occurred within a secluded greenbelt located between Overhill Drive and Sunset Drive, north of Eureka Way in Redding. The elevated sanitary trunk sewer line (built in 1958) runs along Jenny Creek for approximately 2400 feet, ending at the Mary Street Lift Station. The original spill report to the Discharger was received at 1:15 p.m. on 15 October 2007. A resident on Sunset Drive arrived home to hear rushing water in his backyard. After investigating the noise, he saw the broken sewer line. The resident did not recall hearing the rushing water earlier that morning when he left for work. The Discharger reported that a bypass pumping system that stopped the discharge was up and running by 3:40 p.m. Temporary repairs to the pipeline were completed by 6 p.m. on 15 October 2007. The Discharger reported that the volume of the spill was between 20,155 gallons (2 hours & 25 minutes of discharge) and 63,940 gallons (7 hours & 40 minutes of discharge). A more accurate number could not be reached, due to the fact that the exact duration of the spill is unknown.
8. Once the 15 October 2007 spill was identified, the Discharger provided a timely initial notification to the California Office of Emergency Services and other state and local agencies including the Central Valley Water Board. The Discharger also issued a press release soon after the spill was discovered. Central Valley Water Board staff responding to the scene on 15 October 2007 noted significant Discharger resources responding to the incident. The Discharger initiated a sampling program to assess impacts of the discharge, and requested Board staff's input on this effort and follow-up sampling requirements. The Discharger posted warning signs along Jenny Creek, from the discharge point along to the Sacramento River and along the Sacramento River Trail.
9. Field observations and laboratory results from water samples collected by both City staff and Central Valley Water Board staff indicated impacts to Jenny Creek. Further, water quality sampling results showed elevated concentrations of fecal coliform (above background concentrations and in exceedance of Basin Plan Objectives) in Jenny Creek for approximately two months after the spill. Elevated fecal coliform concentrations were observed at multiple locations throughout Jenny Creek for a distance of approximately 3,500 feet downstream of the discharge point.
10. On 18 October 2007, the Central Valley Water Board issued a Notice of Violation (NOV) to the Discharger for the sanitary sewer overflow to Jenny Creek. The NOV required the Discharger to submit 1) a technical report detailing the cause and response to the spill, 2) a technical report detailing an immediate inspection of the elevated collection system in the Jenny Creek drainage, and 3) a technical report containing a priority list and time

schedule for interim repairs of unacceptable sections of sewer lines in the area. The discharger had inspected the elevated section of pipe in March 2007 and made numerous repairs with either cement grout or syntho-glass wrap.

11. On 22 October 2007, after reviewing water quality monitoring data that showed a high fecal Coliform bacteria count in Jenny Creek above the spill site, Central Valley Water Board staff and City staff discovered another leak in the elevated sewer collection pipe approximately 300 feet west of the spill site (upstream). This sewage leak also combined with ambient flows in Jenny Creek and could not be cleaned up once it entered the creek. Water quality sampling results in Jenny Creek indicated bacteria levels that exceeded Basin Plan Objectives (fecal coliform reported at 500 MPN/100mL to >160000 MPN/mL). The leak was estimated at 2 gallons per minute, for an unknown duration. Repairs to this section of piper were made immediately. The Discharger reported the volume of the second spill to Jenny Creek to be 2420 gallons.

12. CWC section 13376 states, in relevant part:

Any person discharging pollutants or proposing to discharge pollutants to the navigable waters of the United States ... shall file a report of the discharge in compliance with the procedures set forth in Section 13260... The discharge of pollutants...except as authorized by waste discharge requirements [NPDES permit]...is prohibited.

13. CWC section 13385 states, in relevant part:

(a) Any person who violates any of the following shall be liable civilly in accordance with this section:

- (1) Section 13375 or 13376.
- (2) Any waste discharge requirements...issued pursuant to this chapter...

- (5) Any requirements of Section 301, 302, 306, 307,308, 318, 401, or 405 of the Clean Water Act, as amended.

(c) Civil liability may be imposed administratively by the state board or a regional board pursuant to Article 2.5 (commencing with Section 13323) of Chapter 5 in an amount not to exceed the sum of both of the following:

- (1) Ten thousand dollars (\$10,000) for each day in which the violation occurs.
- (2) Where there is a discharge, any portion of which is not susceptible to cleanup or is not cleaned up, and the volume discharged but not cleaned up exceeds 1,000 gallons, an additional liability not to exceed ten

dollars (\$10) multiplied by the number of gallons by which the volume discharged but not cleaned up exceeds 1,000 gallons.

(e) In determining the amount of any liability imposed under this section, the regional board, the state board, or the superior court, as the case may be, shall take into account the nature, circumstances, extent, and gravity of the violation or violations, whether the discharge is susceptible to cleanup or abatement, the degree of toxicity of the discharge, and, with respect to the violator, the ability to pay, the effect on its ability to continue its business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violation, and other matters that justice may require. At a minimum, liability shall be assessed at a level that recovers the economic benefits, if any, derived from the acts that constitute the violation.”

14. **Minimum Civil Liability.** Pursuant to CWC section 13385(e), at a minimum, administrative civil liability charged under this section must be equivalent to the economic benefit that the Discharger gained by not implementing management and physical improvements necessary to prevent the discharge. In May 2006, the Discharger’s consultant submitted a report that indicated the Jenny Creek elevated sanitary trunk sewer “was in extremely poor condition and needed to either be rehabilitated or replaced.” In the summer of 2007, the Discharger began to plan and design a new force main and lift station that would reroute flows away from the Jenny Creek existing elevated sanitary truck sewer. The City was well aware of the poor condition of the elevated trunk sewer and the severity of the discharge could have been prevented through adequate inspections and/or the early replacement of the fifty-year old piping. The Discharger reported that they expended \$142,176 as a result of this spill including labor, pipe replacement and water quality sampling. Although they spent monies repairing the damage following the spill, they had an economic savings conservatively estimated at \$7,744 by not replacing the elevated trunk sewer sooner or by not establishing an inspection program after they received information indicating that the line was in extremely poor condition.
15. **Maximum Civil Liability.** Pursuant to CWC section 13385(c), the maximum administrative civil liability in this case may be assessed at \$10,000 per violation per day plus ten (\$10) dollars per gallon discharged that is not cleaned up minus one thousand gallons. Based on Findings 6 through 11 above there were at minimum two days of violations. The combined maximum assessment for the two spills is between **two hundred twenty-five thousand, seven hundred fifty dollars (\$225,750)** (($\$10,000$ per day x 2 days) plus ((20,155 -1000)+(2420-1000)) x \$10 per gallon) and **six hundred sixty-three thousand, three hundred dollars (\$663,600)** (($\$10,000$ per day x 2 days) plus ((63,940-1000)+(2420-1000)) x \$10 per gallon), depending on which value is used for the volume of the 15 October 2007 spill.
16. The following table contains the factors that were considered pursuant to CWC section 13385(e) in setting the initial penalty amount:

Factors	Consideration
Nature, Circumstance, Extent, and Gravity of the Violation	The Discharger was well aware of the extremely poor condition of this elevated sewer line and the severity of the discharge could have been prevented through adequate inspections and/or the early replacement of the sewer line
Degree of Culpability	The Discharger is the owner and responsible party for operation and maintenance of the sewer line.
Voluntary Cleanup Efforts	The Discharger responded immediately and expended the necessary resources to stop and cleanup the release
Susceptibility to Cleanup or Abatement	Raw sewage, once in the water way is difficult to cleanup, however, the Discharger stopped the discharge as soon as was possible.
Degree of Toxicity	Although not toxic, the raw sewage was a health hazard and threat to public health and the City's water supply.
Prior history of Violations	The Discharger has had other raw sewage discharges and sanitary sewer overflows from other parts of their collection system.
Economic Benefit or Savings resulting from the Violation	By not replacing the sewer line earlier they had economic savings conservatively estimated at \$7,744
Ability to Pay	The Discharger has not submitted evidence of inability to pay the penalty or ability to continue in business.
Other Matters that Justice May Require	Staff cost for responding to the violation are approximately \$2,500

17. CWC section 13385 states, in part:

(l)(1) In lieu of assessing penalties pursuant to subdivision (h) or (i), the state board or the regional board, with the concurrence of the discharger, may direct a portion of the penalty amount to be expended on a supplemental environmental project in accordance with the enforcement policy of the state board. If the penalty amount exceeds fifteen thousand dollars (\$15,000), the portion of the penalty amount that may be directed to be expended on a supplemental environmental project may not exceed fifteen thousand dollars (\$15,000) plus 50 percent of the penalty amount that exceeds fifteen thousand dollars (\$15,000)."

(2) For the purposes of this section, a "supplemental environmental project" means an environmentally beneficial project that a person agrees to undertake, with the approval of the regional board that would not be undertaken in the absence of an enforcement action under this section.

18. On 19 June 2009 the Discharger submitted a letter requesting a reduction in the assessed amount of the liability and proposing to fund a project that would be managed and undertaken by the Western Shasta Resources Conservation District as a supplemental environmental project (SEP) to offset a portion of the administrative civil liability. The proposed SEP is the removal of invasive weeds along Jenny Creek and the replanting of native vegetation. The project is between Highway 299 west and the Sacramento River. Invasive plants heavily impacted Jenny Creek. These plants have a detrimental effect on the watercourse including water quantity and water quality. The project would provide for planning and labor necessary to remove invasive plants and

replanting of native plants to the extent possible. Details of the SEP are included as Attachment A, a part of this Order.

19. Issuance of this Administrative Civil Liability Complaint to enforce CWC Division 7, Chapter 5.5 is exempt from the provisions of the California Environmental Quality Act (Pub. Resources Code § 21000, et seq.), in accordance with California Code of Regulations, title 14, section 15321(a)(2).
20. On 15 March 2007, the Central Valley Water Board explicitly delegated to the Executive Officer the authority to issue orders to assess administrative civil liability where the matter is not contested by the discharger. (Resolution R5-2007-0009).
21. This tentative Order is set to become final on or after **29 September 2009**, provided that significant comments raising issues that would cause the Central Valley Water Board to reconsider this action are not received in the public comment period.

IT IS HEREBY ORDERED, pursuant to CWC section 13385, that:

1. The Discharger, its agents, successors and assigns, shall be assessed an Administrative Civil Liability in the amount of seventy seven thousand, five hundred dollars (\$77,500).
2. **Within 30 days of this Order becoming final**, the Discharger shall pay \$40,000 by check, which contains a reference to "ACL Order R5-2009-0549" and is made payable to the *State Water Pollution and Abatement Account*.
3. The remaining \$37,500 in administrative civil liability shall be permanently suspended, provided that the Discharger ensures that the SEP outlined in Attachment A is successfully completed by the Western Shasta Resource Conservation District. Pursuant to the State Water Resources Control Board's Policy on Supplemental Environmental Projects, the following must be done to ensure that the remaining portion of the administrative civil liability is permanently suspended:
 - a. Either the Discharger or the Western Shasta Resource Conservation District shall provide three **Quarterly Reports** to the Central Valley Water Board, Redding Office, detailing progress on the SEP. The quarterly reports shall be due on **1 November 2009, 1 February 2010, and 1 May 2010**, and may be submitted electronically. While the quarterly reports are not intended to be overly burdensome, they must contain, at a minimum, the following:
 - i. Whether work was performed on the project (if not, then disregard ii-iv),
 - ii. The dates on which work was performed,
 - iii. Receipts for cost expenditures on the project to date, and
 - iv. Photographic evidence of work undertaken pursuant to the SEP. Photos must document successful implementation of performance standards

employed for invasive-plant removal: direct removal and pesticide application.

Submitting these reports will allow the Central Valley Water Board to permanently suspend liability equal to the amount expended at the time the quarterly reports are submitted. Please note that although the Western Shasta Resource Conservation District may submit these quarterly reports, the Discharger maintains ultimate responsibility for submitting these reports in a timely manner. Failure to turn the reports in on time may result in the Executive Officer demanding payment of the remaining liability that has not yet been permanently suspended.

- b. By **1 August 2010**, the Discharger or the Western Shasta Resource Conservation District shall provide a **Final Report** to the Central Valley Water Board documenting completion of the SEP as described in Attachment A, and proof of expenditures totaling at least \$37,500. Items ii-iv, included in the quarterly reports, shall also be included in the Final Report. Again, please remember that the Discharger maintains ultimate responsibility for submitting this report in a timely manner.

The following statement, accompanied by a signature of a duly authorized agent of either the Discharger or the Western Shasta Resource Conservation District, shall accompany the Final Report:

"I certify, under penalty of perjury, that the foregoing is true and correct."

If less than \$37,500 has been expended on the SEP as of 1 August 2010, then the difference between the expenditures and \$37,500 shall be remitted to the Central Valley Water Board, Redding Office, by **31 August 2010** by check, which shall contain a reference to "ACL Order R5-2009-0549" and shall be made payable to the State Water Pollution Cleanup and Abatement Account.

- c. When publicizing the project, the Discharger shall state in a prominent manner that the project was undertaken as part of the settlement of a Board enforcement action.
- d. Should the Executive Officer determine that the goals of the project are not being met, the Executive Officer may demand payment of the difference between the expenditures at the time of the demand and the total amount of suspended liability. Upon demand, payment must be remitted to the Central Valley Water Board, Redding Office, within 30 days by check, which shall contain a reference to "ACL Order R5-2009-0549" and shall be made payable to the State Water Pollution Cleanup and Abatement Account.
- e. Should the SEP be completed before the 1 August 2010 deadline, the Discharger or the Western Shasta Resource Conservation District may provide the **Final Report** in mentioned in section 3.b early, thereby relieving the Discharger from submitting additional quarterly reports.

- f. The Western Shasta Resource Conservation District must agree to an audit of its SEP expenditures, if requested by the Central Valley Water Board.

This Order constitutes a settlement of the violations alleged in Administrative Civil Liability Complaint No. R5-2008-0509. Notice of this settlement will be published on the Central Valley Water Board's website, and will be provided to all interested parties. This Order is to become final upon expiration of the 30-day public notice and comment period mandated by Federal regulations (40 CFR 123.27) and upon signature.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with CWC section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of that this Order becomes final, except that if the thirtieth day following the date that this Order becomes final falls on a Saturday, Sunday, or state holiday (which includes furlough days), the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

PAMELA C. CREEDON, Executive Officer

Date

Attachment A
 Administrative Civil Liability Order R5-2009-0549

SEP Project Description

Project Title: Control of Invasive Weeds in Jenny Creek Drainage

Name Of Responsible Entity: Western Shasta Resource Conservation District

Estimated Cost For Project Completion: \$40,000

Contact Information:

Name Mary Mitchell
 Address 6270 Parallel Road
 City/State/Zip Anderson, CA 96007-4833
 Telephone (530) 365-4833

Brief Description Of The Project:

The area of Jenny Creek between Highway 299 and the Sacramento River is heavily impacted by invasive weeds (Himalayan blackberry, Tree of Heaven, brooms, etc) impacting water quantity and water quality. The plan is to remove and/or control invasive species with hand pulling and herbicide application appropriate for the site and replant with native species as practical.

Jenny Creek Invasive Weed Control				
Personnel	Total	Hours	Rate/hr	
Project Manager	\$528	24	\$22	
Accounting	\$360	20	\$18	
GIS specialist	\$1,150	46	\$25	
Field Sup	\$2,040	120	\$17	3 wks
Lead Tech	\$2,800	200	\$14	5 wks includes follow-up & repair
Field Tech	\$7,200	600	\$12	5 wks, 3 field techs
Subtotal	\$14,078			
Benefits/tax 30%	\$4,223			
Total personnel	\$18,301			
Supplies	\$4,150			Includes herbicides, tools, & plants
CEQA/Permits	\$3,200			Includes cultural resources
Equipment use	\$4,500			
Mileage	\$957	1740	\$0.55	58 trips @ 30 miles round trip
Subtotal	\$31,108	34783		
Indirect 15%	\$4,666	5217		
Total	\$39,998	40000		