

2023 Sewer System Management Plan

For the

Lewiston Community Services District

Created June 2023

CRWA – Dan Lafontaine, P.E., Wastewater Specialist PACE Engineering – Nicole Harris, P.E., Associate Engineer

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Sewer System Management Plan (SSMP)

June 2023

GENERAL INFORMATION

What is a Sewer System Management Plan?

A Sewer System Management Plan, also called an SSMP, is a document that describes the activities your agency uses to manage your wastewater collection system effectively.

Effective management of a wastewater collection system includes:

- 1. Maintaining or improving the condition of the collection system infrastructure in order to provide reliable service into the future.
- 2. Cost-effectively minimizing infiltration/inflow (I/I) and providing adequate sewer capacity to accommodate design flows; and
- 3. Minimizing the number and impact of sanitary sewer overflows (SSOs) that occur; In order to achieve the above goals, it is expected that each wastewater collection system agency develop and implement an SSMP.

Why are SSMPs Being Required Today?

Collection Systems are the last major component of the wastewater management system yet to be regulated. Treatment plants, including pretreatment programs, have been regulated for some time. In addition, other networks have been regulated as well, such as potable water, natural gas, electricity, and liquid fuels, among others. While the federal government has developed unpublished draft regulations (sometimes referred to as the "CMOM" program, which stands for Capacity, Management, Operations, and Maintenance), this program has not been officially implemented for a variety of reasons, and Regional Water Boards in California have decided to move forward and implement their own SSO control programs now due to the growing emphasis on reducing overflows.

The State Water Resources Control Board has issued Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems Order No. 2022-0103-DWQ which requires the

enrollee to develop and implement an SSMP. Lewiston has elected to continue coverage under this General Order.

SSMP's should be audited internally every three years and updated every six years. The Legally Responsible Official (LRO) should submit an audit report into the online California Integrated Water Quality System (CIWQS) Sanitary Sewer System Database per the Statewide General Waste Discharge Requirements.

Data Management

Wastewater collection agencies are not required by the regional board to use computer-based maintenance management systems (CMMS) or Geographical Information Systems (GIS) software to manage their wastewater collection systems; although there is a wide range of software currently available to match most agencies needs and budgets, for both large and small systems. Collection system agencies may find that computer-based solutions are a more effective way to manage large numbers of wastewater collection system assets. Regardless of the method selected for managing information, operations, maintenance and capital improvement procedures should be documented in writing and an SSMP is intended to fulfill that role. LCSD with the assistance of California Rural Water Association and PACE Engineering have developed numerous processes and procedures to satisfy the elements of the SSMP.

System Overview

The community of Lewiston is located in Northern California near the Eastern border of Trinity County 40 miles West of Redding CA on Route 299 and was established in 1957 by the U.S. Bureau of Reclamation as a government work camp for the construction of the Lewiston Dam and the Trinity Dam, a part of the Central Valley Project. Following the completion of the dams, the government parcels were sold to residents and other investors. Two major subdivisions were created Lewiston Park and Lewiston Heights, and various other private parcels, including the Trinity Dam Mobile Home Park (TDMHP). Community water supply and wastewater treatment and disposal for Lewiston Park was provided by the Lewiston Park Mutual Water Company (LPMWC). Community water supply and wastewater treatment and disposal for Lewiston Heights was provided by the Lewiston Valley Mutual Water Company (LVMWC). The TDMHP had no community wastewater service and discharged domestic wastewater to a large septic tank and then to an unlined pond located adjacent to the park. In 2010, Lewiston Community Services District (LCSD) took over the LVCSD water and wastewater systems. In 2018, LPMWC was consolidated under the LCSD and in 2019 after construction of a new wastewater collection system and wastewater treatment plant (WWTP), TDMHP began discharging its domestic wastewater to the LCSD wastewater system. As part of the consolidation effort, the Wastewater Collection, Treatment, And Disposal Project upgraded the facility by replacing the collection system and all service laterals for the former LPMWC and TDMHP in their entirety, portions of the former LVMWC collection system and all lateral pipelines made of Orangeburg pipe (a pipe material made of wood pulp and sealed with coal tar). The existing suspended pipeline over the Trinity River from the WWTP to the effluent disposal leach fields was replaced also. Lift stations 1 and 2 were decommissioned and a new lift station was constructed to convey all wastewater from the former LVMWC and TDMHP to the new LCSD WWTP. The collection system contains piping in various sizes as detailed below:

Table 1
Collection System piping

Description	Material	Size (inch)	Approximate Length (ft) or number
Gravity Main	PVC	8	9,850
Gravity Main	PVC	6	4,690
Gravity Main	PVC	4	100
Force Main ¹	PVC	4	7,420
Force Main ²	PVC	3	5,140
Laterals	PVC	4	7,850
Manholes			41
Rod Holes			13

Notes:

Table 2
Sewer Lift Station

Lift Station	APN	Year Constructed	Capacity (MGD)	Needed Improvements
TDBLS	Riley Mine Rd. and Trinity Dam Blvd	2020	0.23 (160 GPM)	None

^{1.} The 4-inch force main carries wastewater from the WWTP to the Bypass Ponds only when the WWTP must be bypassed.

^{2.} The 3-inch force main carries clarified effluent from the TDBLS to the WWTP.

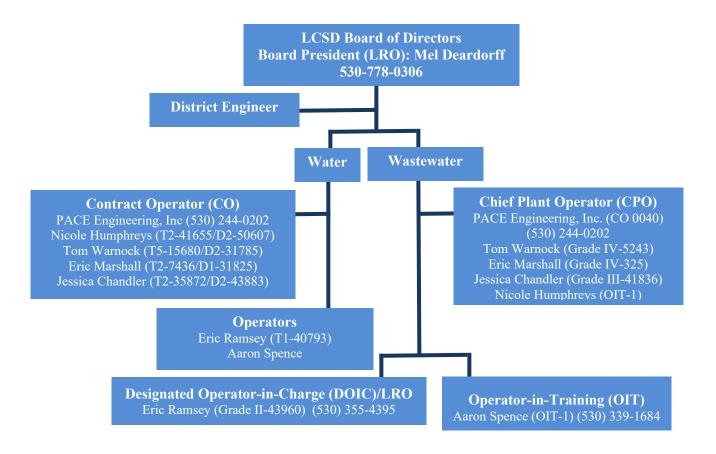
1. GOALS

The LCSD, district engineer, contract operator, and the operations staff are working together to achieve the following goals, which are incorporated into the SSMP.

- Continue to professionally manage, operate and maintain all parts of the wastewater collection system
- Provide adequate capacity to convey peak flows
- Minimize the frequency of SSOs
- Mitigate the impact of SSOs
- Achieve Collection System Team goals including annual production rates for cleaning and inspection, short response times to customer calls, and high levels of customer satisfaction.

2. Organization

The organizational structure has been presented below June 2023.



Description of Responsibilities:

Board of Directors: Establish policy.

Board President: Plans, organizes, directs, performs, and supervises all work activities of LCSD, including maintenance and repairs of sewer infrastructure. The Board President advises the Board of Directors on public works and/or engineering matters. The Board President confers with contractors, engineers, and members of the general public on construction and maintenance problems and procedures. The Board President prepares the budget, while the Board of Directors approves the budget. The Board President prepares cost estimates and obtains approval of the Board of Directors for all impending public work other than normal repairs and maintenance. The Board President is the LRO for all managerial decisions regarding the collection system and wastewater treatment plant.

Contract Operator/Chief Plant Operator (CPO): Responsible for overall operation of the WWTP, including compliance with effluent limits established in LCSD's waste discharge requirements. Oversees LCSD Operator's.

Designated Operator-in-Charge (DOIC)/LRO: Responsible for the overall operation of the WWTP, including compliance with the applicable waste discharge requirements, when the CPO is unable to carry out the responsibilities of the position. Responsible for operation and maintenance of the collection system, including, cleaning, unplugging, and repairing sewer lines and inspecting lift stations. The DOIC locates and lifts manhole covers and operates power equipment. The DOIC is responsible for scheduling sewer cleaning with outside contractors upon Board approval. The DOIC is first responders who are responsible for underground service alerts and responding to SSOs. The DOIC is authorized to certify electronic spill reports submitted to the SWRCB and can submit SSO reports to appropriate government agencies. The DOIC is responsible for implementing and maintaining all elements of this SSMP.

Operator-in-Training (OIT): Under the direct supervision of the CPO and DOIC, assists with operation and maintenance of the WWTP and collection system. Will assist the DOIC in cleaning, unplugging, and repairing sewer lines and inspecting lift stations. The DOIC locates and lifts manhole covers and operates power equipment. The OIT will assist the DOIC in responding to requests for underground service alerts and responding to SSOs.

3. Legal Authority

Legal authority for permitting flows into the system, inflow/infiltration control as well as enforcement of proper design, installation, and testing standards, and inspection requirements for new and rehabilitated sewers is waived for the LCSD SSMP due to the population of Lewiston being 1,193 people (less than 10,000 people).

4. Operation and Maintenance Program

Operation and Maintenance Manual: LCSD has contracted with PACE Engineering to complete the O&M manual for the new WWTP, collection system, and lift stations, which was installed in December 2020. The OM manual holds standard operating procedures (SOP's) for equipment and instrument used for the maintenance of the collection system. This document is an evolving document that will be updated when processes are revised or new ones are implemented and as needed to meet regulatory requirements.

Collection System Map

A collection system map has been included as Figure 1 that shows the location of sewer lines manholes and lift stations.

Collection System Budget Allocation

The collection system Operation and Maintenance (O&M) is completed by LCSD employees. LCSD has an agreement with PACE Engineering to provide contract operations as needed in the collection system. It is estimated that approximately 30% of their annual budget is spent on collection system O&M which is funded through wastewater rates. Total revenues bring a total budget for 2020/2021 to \$138,600. Sewer rates are increasing yearly beginning in fiscal year (FY) 17/18 through the FY 22/23. The latest increase in flat rates were implemented as of July 1, 2022. Monthly flat rates increased from \$73.70 per month for the FY 21-22 to \$75.91 per month for the FY 22-23.

Preventative Maintenance

Routine preventative maintenance ensures that the collection system remains free of roots; FOG; grit deposits, solids buildup and other objects that can damage the collection system. Routine maintenance on the lift station allows wastewater to flow from low points to the force main which ends at the WWTP.

Collection system: On a quarterly basis, an operator should inspect approximately 10 manholes in a rotation that allows for all the manholes within the collection system to be inspected at least once a year. During inspection, the manholes should be checked for the following:

- Free flow of wastewater
- Presence or absence of FOG
- Manhole rings, lids, joint grouting, and pipe connections for defects and corrosion.
- Check for sources of inflow and infiltration (I&I) e.g., cracks and root intrusions.

The quarterly inspection, along with any specific notes from the inspection, should be recorded on LCSD's Quarterly Checklist. Any major defects witnessed should be corrected as soon as possible.

Lift Station: On a monthly basis check, the submersible pumps at the TDBLS for any debris and or buildup that may interfere with pump operation. In the event that the pump becomes clogged, the inlet screen can be removed to gain access to the pump impeller. Once the block is cleared, the anti-airlock hole should be cleared.

Emergency Generator: On a quarterly basis the engine oil and filters should be changed. The drive belts, electrical systems, and vacuum lines, and air cleaner should be inspected for any signs of damage. The engine may need periodic maintenance at every 200, 500, 1,000, 8,000, and 25,000 hours as described in the manufacturers' OM manual.

Scheduled Inspections and condition assessment

The majority of the collection system is brand new and was constructed in 2020. Initial inspection of the new collection system was completed at the time of construction. It is recommended at this time that the complete collection system be flushed and inspected using closed circuit television (CCTV) on a five-year rotation. As the collection system ages and problem areas are identified, portions of the system may need to be flushed yearly. Flushing includes using a hydro-jetter to remove FOG, dirt and debris form the collection system. In some cases, this debris may need to be removed from the downstream manhole. Flushing of the collection system should be recorded on LCSD's Annual Checklist. Should problem areas become identified they should be put into a quarterly or semiannual cleaning schedule depending on the severity of the problem.

Training

LCSD employs two operators who conduct the day-to-day operations at the WWTP. LCSD has an agreement with an outside firm to perform the duties of Chief Plant Operator and provide contract operations for the WWTP. As such training is performed by the contract operators at PACE Engineering on proper wastewater operations. New employees are given on-the-job training of equipment by both PACE Engineering and LCSD operators until they feel safe and competent using the equipment alone and meet the minimum certification requirements. Safe working practices are also reviewed annually by PACE which include but are not limited to confined space entry, safe lifting techniques, traffic control safety, fall and trip awareness, fire suppression, first aid, CPR, and the recognition of hazardous wastes and their management.

5. Design and Performance Standards

The collection system was installed based on the LCSD Project Manual Volume 2 issued in March of 2019. LCSD has adopted the Construction Standards of the City of Redding available at:

https://www.cityofredding.org/departments/public-works/engineering/construction-standards

6. Spill Emergency Response Plan (SERP)

SWRCB ORDER WQ 2022-0103-DWQ Waste Discharge Requirement:

The Plan must include an up-to-date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to:

- Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;
- Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;
- Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders;
- Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained;
- Address emergency system operations, traffic control and other necessary response activities;
- Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;
- Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;
- Remove sewage from the drainage conveyance system;
- Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;
- Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;
- Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;
- Conduct post-spill assessments of spill response activities;
- Document and report spill events as required in this General Order; and
- Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.

These are the components of the LCSD Sanitary Sewer SERP.

6.1 SERP Goals

The purpose of the SERP is to support an orderly and effective response to Sanitary Sewer Overflows (SSOs). The SERP provides guidelines for LCSD staff to follow in preparing for, responding to, cleaning up, and reporting SSOs that may occur within the LCSD service area.

LCSD's goals with respect to responding to SSOs are:

- Work safely
- Respond quickly to minimize the volume of the SSO
- Eliminate the cause of the SSO
- Prevent sewage system overflows from entering known storm drain facilities or receiving waters to the maximum extent practicable
- Contain the spilled wastewater to the extent feasible
- Minimize public contact with the spilled wastewater
- Mitigate the impact of the SSO
- Meet the regulatory reporting requirements
- Evaluate the causes of failure related to certain SSOs
- Revise response procedures resulting from the debrief and failure analysis of certain SSOs

6.2 SSO Categories

The responsibilities of the SSO Response Team depend on the volume and location of an incident. Four categories of SSOs are defined by the SWRCB:

Category 1 SSO: Discharges of untreated or partially treated wastewater of any volume resulting from an enrollee's sanitary sewer system failure or flow condition that:

- Reach surface water and/or reach a drainage channel tributary to a surface water;
 or
- Reach a municipal separate storm sewer system and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the municipal separate storm sewer system is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or ground water infiltration basin (e.g., infiltration pit, percolation pond).

Category 2 SSO: Discharges of untreated or partially treated wastewater of 1,000 gallons or greater resulting from an enrollee's sanitary sewer system failure or flow condition that do not reach surface water, a drainage channel, or a municipal separate storm sewer system unless the entire SSO discharged to the storm drain system is fully recovered and disposed of properly.

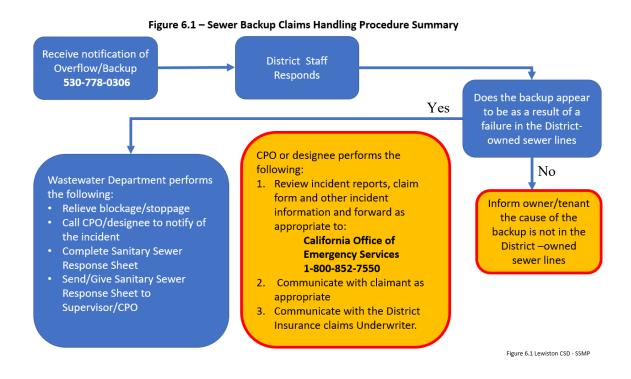
Category 3 SSO: All other discharges of untreated or partially treated wastewater resulting from an enrollee's sanitary sewer system failure or flow condition.

Category 4 SSO: A Category 4 spill is a spill of less than 50 gallons, from or caused by a sanitary sewer system regulated under this General Order that does not discharge to a surface water. A spill of less than 50 gallons that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 4 spill.

6.3 SSO Notification Procedures

There are several methods in which LCSD can learn about the occurrence of an SSO. LCSD offices are open intermittently Monday through Friday, 8:00 a.m. to 5:00 p.m., and all observations made by the public for service calls are received by the public physically stopping by the office or by a call to LCSD which is referred directly to the on-call operator. Alternately, the lift station in the collection system has an alarm which automatically notifies the on-call operator. The most common way LCSD learns of SSO's is through observations by District staff during the normal course of their work.

Emergency calls rarely happen in LCSD and after-hours calls are sent to a voicemail that is checked the following morning. LCSD is currently looking into an after-hours 24-hour answering service to take emergency calls or routing to the fire department. Emergency calls should be directed to 911. The on-call operator makes a determination about the emergency, and, if necessary, summons the appropriate support on 24-hour standby or PACE engineering to mobilize additional cleanup crews. Figure 6-1 shows the sewer backup claims handling procedure summary for SSO initial response.



Observation by the Public

Public observation is the most common way that LCSD is notified of blockages and spills. Contact numbers and information for reporting sewer spills and backups are listed in the phone directory and also on the LCSD's website: https://lewistoncsd.specialdistrict.org/. LCSD's telephone number for reporting sewer problems during normal work hours is 530-778-0306.

When calls are received, either during normal work hours or after hours, the individual receiving the call collects the following information:

- Time and date of call
- Specific location of potential problem
- Nature of call
- In case of SSO, estimated start time of overflow
- Caller's name and telephone number
- Caller's observation (e.g., odor, duration, location on property, known impacts, indication if surface water impacted, appearance at cleanout or manhole)
- Other relevant information

Response During Normal Work Hours

When a report of a sewer spill or backup is made during normal work hours, LCSD administration receives the call, and forwards the call to the Chief Plant Operator or Designated Operator-in-Charge. The Chief Plant Operator or Designated Operator-in-Charge gathers information from the caller and dispatch the Field Crew as needed.

After Hours Response

After-hours calls are answered by LCSD's answering machine, which is monitored by LCSD. The call recipient contacts the Designated Operator-in-Charge.

LCSD is responsible for collecting the following information from all collection system related incoming calls:

- Time and date of call
- Specific location of potential problem
- Caller's address if different than location of SSO
- Nature of call
- In case of SSO, estimated start time of overflow
- Caller's name and phone number
- Caller's observation (e.g., odor, duration, location on property, known impacts, indication
 if surface water impacted, appearance at cleanout or manhole) and other relevant
 information.

Receipt of an Alarm

LCSD has approximately 14,640 feet of gravity pipeline and 12,560 feet of force main in the collection system. The collection system has one sewage lift station. Response procedures are as described above.

To prevent overflow, wastewater blockages are cleared with a contract vacuum truck for disposal to a nearby sanitary sewer manhole.

Observation by District Staff

District staff conducts periodic inspections of its sewer system facilities as part of their routine activities. Any problems noted with the sewer system facilities are reported to appropriate supervisory staff. The supervisory staff responds to emergency situations. Work orders are issued to correct non-emergency conditions.

If a contractor causes or witnesses a Sanitary Sewer Overflow, the contractor must do the following:

- 1. Immediately notify LCSD
- 2. Protect storm drains
- 3. Protect the public.
- 4. Provide information to LCSD collections crew such as start time, appearance point, suspected cause, weather conditions, etc.
- 5. Direct all media and public relations requests to LCSD General Manager

6.4 SSO Response Activities

First Responder

First Responder priorities include the following:

- Follow safety procedures at all times
- Respond promptly with the appropriate and necessary equipment. SSO response time, determined as the difference in time from the incoming service call to arrival at the site, must be no greater than 60 minutes (1 hour).
- Contain the spill wherever feasible
- Restore the flow as soon as practicable
- Minimize public access to and/or contact with the spilled sewage, including pedestrian and vehicular traffic.
- Promptly notify the Operations and Maintenance Manager in event of Category 1 or 2
 SSO
- Return the spilled sewage to the sewer system.

Restore the area to its original condition (or as close as possible)
 Site Response

The First Responder must respond to the reporting party/problem site and visually check for potential sewer stoppages or overflows. At the site, the following list summarizes the responsibilities of the first responder and field response team:

- Document arrival time and verify the existence of a sewer system spill or backup
- Contact caller if time permits
- Identify and assess the affected area and extent of spill
- Determine if the overflow or blockage is from a public or private sewer
- If from the public sewer, determine cause of overflow
- If the spill is large or in a sensitive area, <u>document conditions upon arrival with photographs</u>. Decide whether to proceed with clearing the blockage to restore the flow or to initiate containment measures.
- Post raw sewage signs, as necessary
- Collect wastewater and debris from the site and storm drain and if possible, return the wastewater to the collection system
- Disinfect the affected area and mitigate all other impacts of the SSO
- The First Responder should collect and document all event information on LCSD's Overflow Report Form

6.5 Impact to Waters of United States

If an SSO is confirmed to have entered waters of the United States, the DOIC is immediately notified. The DOIC shall immediately notify California Office of Emergency Services and obtain a control number. The response team then proceeds with the following additional activities:

- Determine the extent of the SSO by investigating downstream until there is no evidence of sewage or debris along the creek or water body
- Conduct Water Quality Sampling, following the process described below. If the SSO is 50,000 gallons or greater, collect water quality samples within 18 hours of becoming aware of the SSO
- Immediately post contaminated water sign(s) and protect the waterbody from public access on all sides
- Photograph sign placement and evidence of the overflow in and around the waterbody to the farthest point reached by the sewage
- Determines if the waterbody is safe to enter. During the winter storm season, cleaning the waterbody may not be feasible due to high water flows
- If feasible, block the waterbody downstream of the affected area in a location that is safe to enter and is accessible to set up a pump or utilize other sewer cleaning equipment
- To the extent feasible, recover and return contaminated water to the collection system
- Perform follow-up sampling until the area shows no water quality impairment and the

posted signs can be removed. The Board President ultimately determines when this happens and makes any follow up calls to affected agencies

6.6 Water Quality Sampling and Testing

Site-Specific Monitoring

For spills that require site-specific monitoring, LCSD shall visually assess the spill location(s) and spread using photography, GPS, and other best available tools. The following shall be documented in the critical spill locations:

- Photography and GPS coordinates for:
 - The system location where the spill originated. For multiple appearance points of a single spill event, the point closest to the spill origin.
- Photography for:
 - Drainage conveyance system entry locations.
 - The location(s) of discharge into surface waters, as applicable.
 - Extent and spread of the spill.
 - The location(s) of cleanup.
- Spill Volume Estimation:
 - Estimate the total spill volume using the spill estimation worksheets included in Appendix A.

Water quality sampling and testing is completed where feasible when spilled sewage enters a water body to determine the extent and impact of the SSO. The water quality sampling procedures are as follows:

- First Responder should collect samples as soon as possible after the discovery and mitigation of the SSO event, following the procedure outlined below
- The water quality samples should be collected near the point of entry of the spilled sewage
- The water quality samples should also be collected from upstream of the spill, from the spill area, and downstream of the spill in flowing water (e.g. creeks)
- The samples shall then be brought to a certified lab for analysis for coliform (total and fecal) and ammonia. Additional sampling will be completed as required by applicable government agencies.

1 40 CFR 230.3(s) defines the term "waters of the United States." This term includes all lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, or natural ponds, or waters that could be used for recreational or other purposes.

The recommended process to obtain samples is provided by the EPA. The process includes a discussion of the following:

- Where to take the sample
- Handling of sample collection bags

Methods for collecting water using screw-cap bottles

6.7 Water Quality Monitoring Plan

A Water Quality Monitoring Plan must be implemented immediately upon discovery of any Category 1 SSO of 50,000 gallons or more in order to assess impacts from SSOs to surface waters. Water quality testing must be completed within 18 hours of LCSD becoming aware of the SSO.

LCSD's SSO Water Quality Monitoring Program includes the following:

- Protocols for water quality monitoring
- Account for spill travel time in the surface water and scenarios where monitoring may not be possible (e.g., safety, access restrictions, etc.)
- Requirement for water quality analyses for ammonia and bacterial indicators to be performed by an accredited or certified laboratory
- Requirement for monitoring instruments and devices used to implement the SSO Water
 Quality Monitoring Program to be properly maintained and calibrated, including any
 records to document maintenance and calibration, as necessary, to ensure their
 continued accuracy

6.8 SSO Technical Report

If 50,000 gallons or greater from an SSO reaches surface waters, an SSO Technical Report must be prepared and submitted to the CIWQS online SSO database within 45 calendar days of the SSO end date. The SSO Technical Report must include, at a minimum, the following:

- 1. Causes and Circumstances of the SSOs
- 2. Complete and detailed explanation of how and when the SSO was discovered
- 3. Diagram showing the SSO failure point, appearance point(s), and final destination(s), including photographs
- 4. Detailed description of the causes(s) of the SSO
- 5. Copies of the original field crew records used to document the SSO
- 6. Historical maintenance records for the failure location
- 7. Response to SSO
- 8. Chronological narrative description of all actions taken to terminate the SSO
- 9. Explanation of how the SERP was implemented to respond to and mitigate the SSO
- 10. Final corrective action(s) completed and/or planned to be completed, including a schedule or actions not yet completed
- 11. Water Quality Monitoring
- 12. Description of all water quality sampling activities conducted including analytical results and evaluation of the results
- 13. Detailed location map illustrating all water quality sampling points
- 14. Detailed description of the methodology employed, and available data used to calculate the discharge volume and, if applicable, the recovered spill volume.

15. Evaluation of spill impact(s) including a description of short-term and long-term impact(s) to beneficial uses of the surface water.

LCSD LRO is responsible for the development and certification of the SSO Technical Report.

6.9 Recovery and Cleanup

The recovery and cleanup phase begins immediately after the flow has been restored and the SSO has been contained to the extent possible. The SSO recovery and cleanup procedures include volume estimation, sewage recovery, and cleanup and disinfection.

Estimate the Volume of Spilled Sewage

Use the methods outlined in the SSO Volume Estimation Guide, Appendix A to estimate the volume of the spilled sewage. Wherever possible, document the estimate using photos of the SSO site before and during the recovery operation.

Recover Spilled Sewage

Vacuum up and/or pump the spilled sewage and discharge it back into the sanitary sewer system.

Complete Clean-up and Disinfection

Cleanup and disinfection procedures should be implemented to reduce the potential for human health issues and adverse environmental impacts that are associated with an SSO event. The procedures described are for dry weather conditions and should be modified as required for wet weather conditions. Where cleanup is beyond the capabilities of District staff, a cleanup contractor will be used.

Private Property

District crews are responsible for the cleanup when the property damage is minor in nature and is outside of private building dwellings. In no circumstance is a District employee to enter a private residence. In all other cases, affected property owners can call a water damage restoration contractor to complete the cleanup and restoration. If the overflow into property is the definite cause of District system failure, the property owner can call out a water damage restoration contractor to complete the cleanup and restoration. In both cases, District claim forms may be issued if requested by the property owners.

Collect all signs of sewage solids and sewage-related material either by protected hand or with the use of rakes and brooms. Wash down the affected area with clean water until the water runs clear. Take reasonable steps to contain and vacuum up the wastewater. Allow area to dry. Repeat the process if additional cleaning is required.

<u>Landscaped and Unimproved Natural Vegetation</u>

Collect all signs of sewage solids and sewage-related material either by protected hand or with the use of rakes and brooms. Wash down the affected area with clean water until the water runs clear. The flushing volume should be approximately three times the estimated volume of the spill. Either contain or vacuum up the wash water so that none is released. Allow the area to dry. Repeat the process if additional cleaning is required.

Natural Waterways

The Department of Fish and Wildlife will be notified by OES as appropriate in the event of a fish kill or SSO greater than 1,000 gallons.

Fish and Wildlife will provide the professional guidance needed to effectively clean up spills that occur in these sensitive environments. Clean up should proceed quickly in order to minimize negative impact. Sewage causes depletion of dissolved oxygen, which will kill aquatic life. Any water that is used in the cleanup should be dechlorinated prior to use.

Wet Weather Modifications

Omit flushing and sampling during heavy storm events (i.e., sheet of rainwater across paved surfaces) with heavy runoff where flushing is not required and sampling would not provide meaningful results.

6.10 SSO Failure Analysis

It is the responsibility of the DOIC to investigate an SSO and to ensure that the procedures in the SERP are followed or modified as a result of the incident failure analysis. The failure analysis is intended to determine if additional maintenance, repair/replacement or other follow-up actions or response procedures changes are needed to reduce or eliminate the likelihood of future SSOs. The procedures for investigating an SSO are as follows:

- Reviewing and completing the Sewer Overflow Report
- Reviewing the incident timeline and other documentation regarding the incident
- Review actions by all persons involved in the response, including the initial recipient of the complaint
- Reviewing communications with the all-reporting parties, and witnesses
- Review volume estimate, volume recovered estimate, volume estimation assumptions and associated drawings
- Reviewing available photographs
- Interviewing staff that responded to the spill
- Reviewing past maintenance records of all affected manholes and pipe segments
- Reviewing past CCTV records

- Conducting a CCTV inspection to determine the condition of the line segment immediately following the SSO and reviewing the video and logs
- Reviewing any FOG related information or results
- Identify any changes or additions needed to the SERP and SSMP following the event

The product of the failure analysis investigation should be the determination of the root cause and identification of the corrective actions.

6.11 SSO Documentation and Recordkeeping

In accordance with the WDR, the LCSD maintains records for each sanitary sewer overflow. Records include:

- Documentation of response steps and/or remedial actions
- Photographic evidence to document the extent of the SSO, field crew response operations
- Site conditions after field crew SSO response operations have been completed
- The date, time, location, and direction of photographs taken will be documented
- Documentation of how any estimations of the volume of discharged and/or recovered overflow were calculated

The records are maintained at the LCSD District Office.

LCSD also maintains records of all complaints received, whether or not they result in an SSO. Each complaint record includes:

- Date, time, and method of notification
- Date and time the complainant or informant first noticed the SSO
- Narrative description describing the complaint
- A statement from the complainant or informant, if they know, of whether or not the potential SSO may have reached waters of the United States
- Name, address, and contact telephone number of the complainant or informant reporting the potential SSO (if not reported anonymously)
- Follow-up return contact information for each complaint received (if not reported anonymously)
- Final resolution of the complaint
- Work service request information used to document all feasible and remedial actions taken

6.12 Notification to Regulatory Agencies and Regulatory Reporting

Table 6-1 summarizes the regulatory reporting requirements that are also described in the paragraphs following the table.

Table 6-1: Regulatory Reporting Requirements

Element	Requirement	Met
NOTIFICATION	Within two hours of becoming aware of any Category 1 SSO greater than or equal to 1,000 gallons discharged to surface water or spilled in a location where it probably will be discharged to surface water, the LCSD will notify the California Office of Emergency Services (OES) and obtain a notification control number.	Call Cal OES at: (800) 852-7550
REPORTING	 Category 1 SSO: LCSD will submit draft report within three business days of becoming aware of the SSO and certify within 15 calendar days of SSO end date. Category 2 SSO: LCSD will submit draft report within 3 business days of becoming aware of the SSO and certify within 15 calendar days of the SSO end date. Category 3 SSO: LCSD will submit certified report within 30 calendar days of the end of month in which the SSO occurred. Category 4 SSO: LCSD will submit certified report within 30 calendar days of the end of month in which the SSO occurred. SSO Technical Report: LCSD will submit within 45 calendar days after the end date of any Category 1 SSO in which 50,000 gallons or greater are spilled to surface waters. "No Spill" Certification: LCSD will certify that no SSOs occurred within 30 calendar days of the end of the month or, if reporting quarterly, the quarter in which no SSOs occurred. Collection System Questionnaire: LCSD will update and certify every 12 months 	 Enter data into the CIWQS Online SSO Database (http://ciwqs.waterboards.ca.gov/, certified by the Legally Responsible Of ficial(s). All information required by CIWQS will be captured in the Sanitary Sewer Overflow Report. Certified SSO reports may be updated by amending the report or adding an attachment to the SSO report within 120 calendar days after the SSO end date. After 120 days, the State SSO Program Manager must be contacted to request to amend an SSO report along with a justification for why the additional information was not available prior to the end of the 120 days.
WATER QUALITY MONITORING	LCSD will conduct water quality sampling within 18 hours after initial SSO notification for Category 1 SSOs in which 50,000 gallons or greater are spilled to surface waters.	Water quality results will be uploaded into CIWQS for Category 1 SSOs in which 50,000 gallons or greater are spilled to surface waters.
RECORD KEEPING	 LCSD will maintain the following records: SSO event records. Records documenting Sanitary Sewer Management Plan (SSMP) implementation and changes/updates to the SSMP. Records to document Water Quality Monitoring for SSOs of 50,000 gallons or greater spilled to surface waters. Collection system telemetry records if relied upon to document and/or estimate SSO Volume. 	Self-maintained records shall be available during inspections or upon request.

Multiple Appearance Points – Single SSO

For reporting purposes, if one SSO event of whatever category results in multiple appearance points in a sewer system, a single SSO report is required in CIWQS which includes the GPS coordinates for the location of the SSO appearance point closest to the failure point, blockage or location of the flow condition that caused the SSO, and descriptions of the locations of all other discharge points associated with the single SSO event.

2-Hour Notification to Regulatory Agencies of SSOs

The Office of Emergency Services (OES) is only to be notified of a Category 1 SSO greater than or equal to 1,000 gallons discharged to surface water or spilled in a location where it probably will be discharged to surface water. The DOIC is responsible for reviewing field data for reporting to regulatory agencies. If it is determined that the criteria for OES notification was met, then the DOIC must notify OES of the event no later than two (2) hours after:

- 1. LCSD has knowledge of the SSO;
- 2. Notification is possible; and
- 3. Notification can be provided without substantially impeding cleanup or other emergency measures.

The OES phone number is (800) 852-7550. The First Responder is responsible for obtaining an OES Control number. Following the initial notification to OES and until the SSO report is certified in the SWRCB online SSO Database, the LRO will provide updates (or provide direction for updates to be provided) to OES regarding substantial changes to estimated volume of untreated or partially treated sewage discharged and any substantial changes to known impact(s).

SSO Reporting for Category 1 SSOs

OES shall receive notification of Category 1 SSOs greater than or equal to 1,000 gallons, as stated earlier in this Section.

The Data Submitter must then submit the initial draft report to the SWRCB's CIWQS Online SSO database @ http://ciwqs.waterboards.ca.gov/ciwqs within 3 business days of becoming aware of the SSO,

Within 15 calendar days of the SSO end date, the LRO must review and certify the report in the CWIQS Online SSO database @ http://ciwqs.waterboards.ca.gov/ciwqs

At minimum, the following mandatory information shall be reported prior to finalizing and certifying an SSO report:

Draft Category 1 SSO

- 1. SSO Contact Information: Name and telephone number of staff who can answer specific questions about the SSO being reported
- 2. SSO Location Name
- 3. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field
- 4. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure
- 5. Whether or not the SSO reached a municipal separate storm drain system
- 6. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered
- 7. Estimate of the SSO volume, inclusive of all discharge point(s)
- 8. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain
- 9. Estimate of the SSO volume recovered (if applicable)
- 10. Number of SSO appearance point(s)
- 11. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
- 12. SSO start date and time
- 13. Date and time the enrollee was notified of, or self-discovered, the SSO
- 14. Estimated operator arrival time
- 15. For spills greater than or equal to 1,000 gallons, the date and time OES was called
- 16. For spills greater than or equal to 1,000 gallons, the OES control number

Certified Category 1 SSO

At a minimum, the following mandatory information shall be reported for a certified Category 1 SSO report, in addition to items 1-16 above:

- 1. Description of SSO destination(s)
- 2. SSO end date and time
- 3. SSO causes (mainline blockage, roots, etc.)
- 4. SSO failure point (main, lateral, etc.)
- 5. Whether or not the spill was associated with a storm event
- 6. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the overflow and a schedule of major milestones for those steps
- 7. Description of spill response activities
- 8. Spill response completion date

- 9. Whether or not there is an ongoing investigation, the reasons for the investigation and the expected date of completion
- 10. Whether or not a beach closure occurred or may have occurred as a result of the SSO
- 11. Whether or not health warnings were posted as a result of the SSO
- 12. Name of beach(es) closed and/or impacted. If no beach was impacted, NA must be selected
- 13. Name of surface water(s) impacted
- 14. If water quality samples were collected, identify parameters the water quality samples were analyzed for. If no samples were taken, NA shall be selected
- 15. If water quality samples were taken, identify which regulatory agencies received sample results (if applicable). If no samples were taken, NA shall be selected
- 16. Description of methodology(ies) and type of data relied upon for estimations of the SSO volume discharged and recovered
- 17. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Database will issue a final SSO identification (ID) number

SSO Reporting for Category 2 SSOs

Within 3 business days of becoming aware of the SSO, the LRO must submit the initial report to the SWRCB's CWIQS Online SSO database @ http://ciwqs.waterboards.ca.gov/ciwqs.

Within 15 calendar days of the SSO end date, the LRO must review and certify the report in the CWIQS Online SSO database @ http://ciwqs.waterboards.ca.gov/ciwqs.

Draft Category 2 SSO

At minimum, Items 1-14 in the Draft Category 1 section above shall be reported prior to finalizing and certifying a Category 2 SSO report. In addition to Items 1-14 in the Draft Category 1 section, Items 1-9, and 17 in the Certified Category1 SSO section above shall be included in the certified report.

SSO Reporting for Category 3 SSOs

Within 30 calendar days of the end of the calendar month in which the SSO occurred, the LRO must submit and certify a report to the SWRCB's CWIQS Online SSO database @ http://ciwqs.waterboards.ca.gov/ciwqs.

At minimum, in addition to Items 1-14 in the Draft Category 1 section, Items 1-6, and 17 in the Certified Category 1 SSO section above shall be reported prior to finalizing and certifying a Category 3 SSO report.

SSO Reporting for Category 4 SSOs

Within 30 calendar days after the end of the month in which the spills occurred, the Enrollee shall report and certify the estimated total spill volume exiting the sanitary sewer system, and the total number of all Category 4 spills to the online CIWQS Sanitary Sewer System Database.

No Spill Certification (Monthly)

Within 30 calendar days of the end of a calendar month that there are no SSO's, the LRO must submit and certify a "No Spill" certification to the CIWQS online SSO database.

CIWQS Not Available

In the event that the CIWQS online SSO database is not available, the LRO will fax or e-mail all required information to the RWQCB office in accordance with the time schedules identified above. In such an event, LCSD will submit the appropriate reports using the CIWQS online SSO database when the database becomes available. A copy of all documents that certify the submittal in fulfillment of this section shall be retained in the SSO document file.

North Coast Regional Water Quality Control Board 5550 Skylane Blvd, Suite A Santa Rosa, CA. 95403-1072 Phone: (707) 576-2220

Fax: (707) 523-0135

Amending SSO Reports

The LRO is responsible for amending SSO reports. Certified SSO reports may be updated by amending the report or adding an attachment to the SSO report within 90 calendar days after the SSO end date. After 90 days, LCSD must contact the State SSO Program Manager to request to amend an SSO report along with a justification for why the additional information was not available prior to the end of the 90 days. The SWRCB SSO Program Manager contact information follows:

State Water Resources Control Board Division of Water Quality 1001 | Street 15th Floor Sacramento, CA 95814 E-mail: Russell.norman@waterboards.ca.gov Phone: (916) 323-5598

Technical Report

If 50,000 gallons or greater from an SSO reaches surface waters, an SSO Technical Report must be prepared and submitted to the CIWQS online SSO database within 45 calendar days of the SSO end date. LCSD LRO is response for submitting the Technical Report, which is described in

further detail earlier in this Section.

6.13 Equipment

This section provides a list of specialized equipment that is required to support this SERP.

Closed Circuit Television (CCTV) Inspection Unit – A CCTV Inspection Unit is required to determine the root cause for all SSOs from gravity sewers.

Camera – A digital or disposable camera is required to record the conditions upon arrival, during clean up, and upon departure. All Operators are equipped with a District cell-phone capable of taking photographs.

Emergency Response Trucks -- A utility body pickup truck, or open bed is required to store and transport the equipment needed to effectively respond to sewer emergencies. The equipment and tools should include containment and clean up materials.

Portable Generators, Portable Pumps, Piping, and Hoses – Equipment used to bypass pump, divert, or power equipment to mitigate an SSO.

Combination Sewer Cleaning Trucks -- Combination high velocity sewer cleaning trucks with vacuum tanks are required to clear blockages in gravity sewers, vacuum spilled sewage, and wash down the impacted area following the SSO event.

6.14 Contractors Working On District Sewer Facilities

All contractors working on District sewer facilities will be trained in LCSD's SERP and will be required to follow the SERP in the event that they cause or observe an SSO.

6.15 Training

SSO Response Training

This section provides information on the training that is required to support this SERP.

Initial and Annual Refresher Training

All District personnel who may have a role in responding to, reporting, and/or mitigating a sewer system overflow should receive training on the contents of this SERP. All new employees should receive training before they are placed in a position where they may have to respond. Current employees should receive annual refresher training on this plan and the procedures to be followed. Affected employees will receive annual training on the following topics, at a minimum, by knowledgeable trainers:

- LCSD's Spill Emergency Response Plan
- SSO Volume Estimation Techniques
- Impacted Surface Waters: Response Procedures

LCSD will verify that annual safety training requirements are current for each employee, and that employees are competent in the performance of all core competencies. LCSD will address, through additional training/instruction, any identified gaps in required core competencies.

SSO Response Drills

Periodic training drills should be held to ensure that employees are up to date on these procedures, equipment is in working order, and the required materials are readily available. The training drills will cover scenarios typically observed during sewer related emergencies (e.g. mainline blockage, mainline failure, force main failure, pump station failure, and lateral blockage). The results and the observations during the drills will be recorded and action items should be tracked to ensure completion.

SSO Training Record Keeping

Records should be kept of all training that is provided in support of this plan. The records for all scheduled training courses and for each overflow emergency response training event and will include date, time, place, content, name of trainer(s), and names of attendees.

7. Sewer Pipe Blockage Control Program

LCSD's Sewer Pipe Blockage Control Program and Fats, Oils, and Grease (FOG) Control Program are to be considered the same document.

LCSD is required by the Waste Discharge Requirements (WDRs) Order No. R1-2020-0024, to comply with State Water Board 2006-0003-DWQ, Statewide General WDRs for Sanitary Sewer Systems, as amended by State Water Board Order WQ 2013-0058-EXEC and any subsequent order. On December 6, 2022, the SWRCB adopted new Statewide General WDRs for Sanitary Sewer Systems Order No. WQ 2022-0103-DWQ. This new order became effective on June 5, 2023 and supersedes all previous orders and amendments thereto regarding Sanitary Sewer Systems. Attachment D of the Statewide General WDRs for Sanitary Sewer Systems requires LCSD to evaluate its service area to determine whether a Sewer Pipe Blockage Control Program, including Fats, Oils, and Grease (FOG) is needed. Since the system was installed in Dec of 2020, FOG problems have not developed yet. Being proactive, LCSD has prepared and has implemented a Sewer Pipe Blockage Control Program to reduce the amount of these substances discharged to the sanitary sewer system that result in sanitary sewer overflows (SSOs) when they occur.

Residual FOG are by-products that food preparation, food service establishments (FSEs), automotive service facilities, and machine shops should constantly manage. Typically, FOG enters a facility's plumbing from wash sinks and floor drains during daily operations. Sanitary sewer systems are not designed or equipped to handle accumulating FOG on the interior of sewer collection systems. In a study conducted by the US Environmental Protection Agency (EPA) in 2009, over 65% of SSOs nationwide were caused by FOG. LCSD anticipates that FOG will be a problem within its service area and has developed this FOG Source Control Program for implementation with the following elements:

- Public education and outreach.
- Best management practices (BMPs) for FOG control.
- Disposal methods for FOG generated within the service area.
- Legal authority to prohibit discharge of FOG to the sanitary sewer system.
- Requirements for grease removal devices within the service area.
- Authority to inspect grease producing facilities, enforcement authorities, and whether
 LCSD has sufficient staff to inspect and enforce the FOG ordinance.
- Identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section.

PUBLIC EDUCATION AND OUTREACH PROGRAM

LCSD is in the process of developing a public education and outreach program for its sewer system customers about FOG and other sewer pipe blocking substances. FOG in the local sewer system can be a prime contributor to an SSO. Information on proper disposal of FOG and other SSO prevention measures, including installation of grease removal devices or "grease traps", backwater valves, sewer lateral maintenance, etc. is being developed into brochures and individual notices to property owners. These notifications provide descriptions of grease control efforts that can be undertaken by both homeowners and businesses. LCSD plans to send these brochures annually with the customer's utility bill. Currently LCSD has a few fliers that it will distribute yearly in the monthly bill and will eventually place on its website under the Services/Sewer section that informs the public of financial constraint that disposal of FOG can have on LCSD and its budget. One of the notices is shown below:



These methods are usually effective in relaying information to the community on proper disposal of FOG and other SSO prevention methods.

Other effective ways to communicate with the public will be considered if FOG or other sewer pipe blocking substances are deemed a problem, such as use of LCSD's home web page, and posted in the Trinity Journal for public viewing. Another helpful tool is the exchange of outreach information between agencies, and use of bilingual posters, developed by the California Restaurant Association (CRA) and larger agencies, for direct distribution to FSEs as a BMP tool for training and reminding those who work with FOG producing products.

Related health and safety issues can also result from the discharge of pharmaceuticals and

pesticides into the wastewater collection system. Although not usually a factor in sewer overflows, these chemicals have the potential to be toxic and disrupt environmental and biological effects. Discharges of such chemical compounds into the sewers, should be part of LCSD's education and outreach program if deemed necessary.

BEST MANAGEMENT PRACTICES (BMP) FOR FATS, OILS, AND GREASE

The following are general suggestions for proper BMPs and FOG Management:

Bulk or Dry Clean-Up

- Practice bulk and dry materials clean-up before using wet methods.
- Remove bulk or other solid food and grease-laden substances into a suitable container before rinsing or washing the initial containers or surfaces that will drain into the plumbing system.
- Keep drain screens in place and fully serviceable to avoid clogging drains or accumulating
 FOG or grit on the interiors of pipes.
- Do not pour grease, fats, or oils down the drain; nor place food scraps in the drain.
- Use paper towels to wipe down surfaces and work areas and to soak up oils and grease and dispose of appropriately. Cloth towels require washing and thereby introducing FOG back into the drains.
- Success of bulk or dry clean-up is dependent upon the behavior of individuals and their access to tools and materials for use in removing bulk and dry materials before washing.

Spill Prevention

- Preventing spills reduce the amount of waste that will require clean-up.
- A dry workplace is safer for everyone in avoiding slips, trips, and falls.
- Capture bulk or dry materials and place them into an appropriate container.
- Empty FOG containers before they are full to avoid spills.
- Cover any FOG container before transporting to the rendering storage container.
- Provide employees with proper tools to transport materials without spilling.

Maintenance

- Equipment used to collect, filter, and store FOG should be regularly maintained.
- Employees should be aware of and trained to perform scheduled cleaning procedures.

- A daily and weekly maintenance schedule is highly recommended.
- Contract with a responsible service company to regularly and thoroughly clean larger components and spaces requiring specialized equipment and skills (e.g. large hood filters, hot tanks, floor drain pipes, specialty tools).
- Smaller and less complex elements can be cleaned by the user (e.g. small hood filters, counter/bench tops, sinks, storage areas, daily tools).
- Skim/filter fryer grease daily and test the oil to determine when the oil needs to be replaced. Build-up of carbon deposits on the bottom of the fryer acts as an insulator that forces the fryer to heat longer, thus causing the oil to break down sooner. Daily maintenance extends the life of both the fryer and the oil.
- Fryer oil shall not be discharged into a drain or grease trap but rather disposed into a rendering container for transport to a rendering company.
- Cleaning intervals depend upon the type of product being prepared and the typical deposition of materials experienced. The larger the volume produced and deposits incurred, the more frequent the cleaning. This may warrant setting up a system of high use, high deposition work to be done in certain equipment that is cleaned more frequently.

Grease Traps and Interceptors

The California Retail Food Code, Chapter 7, Article 2 Outlines the requirements for grease traps. For grease traps and interceptors to be effective, the units must be properly sized, constructed and installed in a location to provide an adequate retention time for settling and accumulation of the FOG.

- For information on properly locating, constructing, and sizing grease traps and interceptors, contact the local governmental agency and examine EPA guidance documents and UPC criteria.
- Ensure all grease-bearing drains discharge to the grease trap/interceptor.
- No toilet or shower waste should be plumbed to the trap/interceptor
- Automatic dishwashers should not be plumbed through a grease trap/interceptor.

Oil and Grease Collection/Recycling and Food Donations

- FOG consists of commodities that if handled properly can be treated as a valuable resource.
- Some rendering companies will offer services free of charge and others will give a rebate on the materials collected. Contact the local rendering company.

DISPOSAL METHODS FOR FOG GENERATED WITHIN LCSD SERVICE AREA

LCSD does not currently have a location within Trinity County for FOG disposal. However, residents are encouraged to take their oil to Weaverville or dispose of it in a sealed container and then placed in their waste container. LCSD has trained their personnel to control/manage grease discharges in the system to prevent SSOs. Solidified FOG found in the sewer system during regularly scheduled cleaning operations or clearing of a blockage is trapped and collected along with solid debris (roots, grit, etc.), and removed from the system. Solid debris in a dumpster is taken to a permitted FOG disposal facility, such as a landfill. FOG in liquid form can be flushed down by hydro jetting to the WWTP, however a hydro jetter will need to be rented to do this. The TDBLS Lift station will be cleaned with a degreaser weekly should FOG be noticed. FOG is also removed as floatable at the bar screen or at the surface of the Imhoff tank.

LEGAL AUTHORITY TO PROHIBIT DISCHARGES TO LCSD SANITARY SEWER SYSTEM

LCSD Policy and Procedures Manual (P&P) Section 4000 is specific to LCSD sewer system. P&P section 4080 lists the prohibitions on discharges to LCSD's sanitary sewer system, including "any liquid or other water containing floatable and/or dispersible grease, oil, or fat on animal, vegetable or mineral origin in excess of one hundred (100) parts per million by weight." Per Section 4080 of the P&P, "every person violating any provision of this chapter, including the failure to pay any fees, charges or surcharges imposed hereby, or any condition or limitation of a permit or plan approval issued pursuant thereto, is guilty of an infraction and upon conviction is punishable as set forth in Section 36900 of the California Government Code. Each day during which any violation continues shall constitute a separate and subsequent offense punishable as provided in said Section 36900. LCSD may sue/lien to recover any amounts due LCSD under the provisions of this chapter."

Discharges from industrial classification facilities are usually controlled under the terms of an industrial wastewater discharge permit, which is issued and monitored by LCSD. However, LCSD doesn't have any industrial wastewater users at this time.

REQUIREMENTS FOR GREASE TRAPS WITHIN LCSD SERVICE AREA

P&P Section 4080 requires "all buildings that serve food either full time or part time (such as restaurants) must meet all sections of the Uniform Plumbing Code (UPC) and Section 4080 below, control of fats, oils, and grease." Trinity County Building Official is authorized to monitor and

enforce the terms of the Plumbing Code and the Public Health Code. This includes domestic waste disposal from residential and commercial facilities.

LCSD Board of Directors will approve plans for sewerage construction and issue a permit under Section 4040 of the P&P only if it appears to the LCSD Board and/or District Engineer that the sewerage construction, sewer connection, or other procedure conforms to the requirements of Section 4040 of the P&P Manual. However, according to Section 4040 of the P&P Manual, the approval of plans and issuance of a permit does not relieve the discharger of any duty imposed upon him pursuant to Section 4040 of the P&P Manual.

Grease trap devices should be operated in a manner to control discharges of FOG into the wastewater collection system. If there is a FOG-related problem, LCSD shall give notice of the violation in writing and serve in person or by registered mail to the customer.

The effectiveness of any grease trap is dependent upon routine maintenance and monitoring/inspection for conformance with its intended purpose. LCSD P&P Manual Section 4080 and 4180 includes means of preventing accidental discharge of prohibited substances by requiring annual cleaning, inspection, and certification of pretreatment devices, including grease traps. The owner of any protective device, including grease traps, shall be required to maintain and keep records of regular cleaning, maintenance, and inspection of the protective device, and furnish these records to LCSD on an annual basis. It is recommended protective devices be cleaned as often as is necessary to ensure that sediment and floating materials do not accumulate and impair the efficiency of the protective device. The use of emulsifiers, bacterial additives, or other chemical agents to dissolve grease should be prohibited. All wastes removed from protective devices shall be properly disposed of. A protective device is not considered properly maintained if it is not in good working condition with all internal required plumbing or if the operational fluid capacity has been reduced by more than 25% by the accumulation of floating and settled solids, oils, and greases. If the protective device is not maintained adequately under the conditions of use, the protective device shall be resized, and the FSE owner shall be responsible for installation of one which is effective for its intended purpose.

Protective devices shall be accessible at all times for the purpose of inspection by LCSD staff or building official. Any protective device that has been legally and properly installed before the effective date of the adopted ordinance shall be acceptable, provided such protective device is effective in removing floatable and settleable materials and can be inspected and properly maintained. If LCSD staff or representative finds, by observation, that a protective device is incapable of adequately retaining the floatable and settleable material in the wastewater flow, is in poor condition, or is undersized for the facility, they shall condemn such protective device and declare it does not meet the requirements of the adopted ordinance. This will require the industrial user or FSE owner to install, at his or her own expense, an acceptable replacement protective device.

AUTHORITY TO INSPECT GREASE PRODUCING FACILITIES, ENFORCEMENT AUTHORITIES, AND EVIDENCE OF ADEQUATE STAFFING TO INSPECT AND ENFORCE THE FOG CONTROL ORDINANCE.

LCSD has legal authority to inspect and enforce their P&P Manual for every facility that directly discharges to LCSD's sewage system. Per P&P Manual Section 4160, LCSD or its representative(s) have the right of ingress and egress to the customer premises at reasonable hours for reasonable or necessary purposes if the customer is connected to the LCSD wastewater system P&P Manual Section 4080 lists all materials, substances, liquids, waters, or wastes that shall not be discharge into LCSD sewer system. If an industrial user or FSE is found to be the source of FOG blockages, enforcement will be conducted as needed in response to problems identified by LCSD Board of Directors or representative.

LCSD has limited staff available to conduct annual inspections of the FSEs, where protective devices are connected to LCSD sewer system.

CLEANING SCHEDULE FOR IDENTIFIED FOG-PRONE SEWER SEGMENTS

Studies have shown that FOG contributes to approximately 65% of the total SSO events that occur in a community sewer system. Root intrusion and other structural causes usually contribute the remaining 35%. LCSD's sewer system was constructed in December 2020. Should sections of the LCSD collection system be to contain FOG, roots, or other sewer pipe blocking materials, those areas will be cleaned more often than the routine cleaning schedule of 100% cleaning every 2-years. A list of business that should be inspected on an annual basis is included below.

BUSINESSES TO INSPECT

Restaurants

Mountain Valley Grill, 4811 Trinity Dam Blvd, Lewiston CA 96052 530-778-3177

Schools

Lewiston Elementary School 685 Lewiston Road Lewiston CA 96052 530-778-3984 (o) 530-778-3103 (f)

8. System Evaluation and Capacity Assurance Plan

Based on the population of Lewiston (1,193 people) the system evaluation and capacity Assurance plan is waived for the SSMP.

A capacity evaluation was performed prior to the construction of the new collection system. Another capacity system evaluation should be performed in 5 years concurrent with a rate study to ensure the system maintains adequate capacity.

9. Monitoring, Measurement, and Program Modifications

A map will be generated by the LCSD Engineering firm PACE Engineering that shows the location of all SSO-s and stoppages over the past 12 months as SSOs and stoppages occur. A map was not included with this SSMP as the collection system is brand new. During the next SSMP update; a map will be generated showing all SSO's in the past 12 months and included with this plan, if any have occurred. In future revisions of the SSMP, a summary of all the SSO's and stoppages over the past 12 months will be listed below.

SSO's over past 12 months (volume of SSO's, cause, results):

LCSD has not experienced an SSO in the past 12 months.

Stoppages over past 12 months (number, cause, average response time).

LCSD has not responded to any stoppages in the last 12 months.

10. SSMP Program Audits

<u>Informal Audits</u>

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

Formal Audits

At a minimum, LCSD will update its SSMP every six (6) years after the date of its last Plan Update due date. The updated SSMP will include:

- Elements required in Attachment D (SSMP Required Elements) of order 2022-0103-DWQ
- Summary of revisions included in the Plan update in the Plan based on internal audit findings and
- Other sewer system management-related changes.

As updates to this SSMP are made they will be summarized in an appendix to this SSMP.

LCSDs Board shall approve the updated Plan. The Legally Responsible Official (LRO) shall upload and certify the approved updated plain in the online CIWQS Sanitary Sewer Database in accordance with section 3.11 of Attachment E1 of the General Order No. 2022-0103-DWQ. Audit Details

Beginning in June 2026, and every three years thereafter, the LRO and District Engineer will audit the effectiveness of all elements of the SSMP. The audit will document findings and recommend changes to the SSMP in a written report to LCSD Board of Directors. These audit reports will be kept on file and made available to the public upon request. Minor changes to the SSMP, such as changes to the operation and maintenance element, will be made at the staff level. Significant changes, such as changes to legal authority, must be reviewed and approved by LCSD Board of Directors.

The District's Spill Emergency Response Plan, included herein, should be reviewed annually. The LRO shall certify in its annual report that the Spill Emergency Response Plan is up to date.

11.Communications Program

The LCSD will present this plan to the Lewiston Community Services District Board of Directors at their regularly scheduled meeting, for adoption. After adoption of the SSMP, notice will be sent to customers in their monthly bills and can be posted in the Trinity Journal for public viewing. A copy of the SSMP will be uploaded to CIWQS and to the LCSD website. A hard copy of the SSMP will be located in the community center for public viewing.