

Overflow Emergency Response Plan



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Sanitary Sewer Overflow Emergency Response Plan

1. Purpose

The purpose of the Inland Empire Utilities Agency's (IEUA) Overflow Emergency Response Plan (OERP) is to support an orderly and effective response to Sanitary Sewer Overflows (SSOs). The OERP provides guidelines for IEUA personnel to follow in responding to, cleaning up, and reporting SSOs that may occur within IEUA's service area. Provision D.13vi of State Water Resources Control Board Order No. 2006-0003-DWQ requires wastewater collection agencies to have an Overflow Emergency Response Plan (OERP). This OERP satisfies the requirement.

2. Policy

IEUA employees are required to report all wastewater overflows found and to take the appropriate action to secure the wastewater overflow area, properly report to the appropriate regulatory agencies, relieve the cause of the overflow, and ensure that the affected area is cleaned as soon as possible to minimize health hazards to the public and protect the environment. IEUA's goal is to respond to sewer system overflows as soon as possible following notification. IEUA will follow reporting procedures in regards to sewer spills as set forth by the Santa Ana Regional Water Quality Control Board (*SARWQCB*) and the California State Water Resources Control Board (*SWRCB*).

3. Definitions As Used In This OERP

CALIFORNIA INTEGRATED WATER QUALITY SYSTEM (CIWQS): Refers to the State Water Resources Control Board online electronic reporting system that is used to report SSOs, certify completion of the SSMP, and provide information on the sanitary sewer system.

FOG – Fats, Oils, and Grease: FOG refers to fats, oils, and grease typically associated with food preparation and cooking activities that can cause blockages in the sanitary sewer system.

LEGALLY RESPONSIBLE OFFICIAL (LRO): Refers to an individual who has the authority to certify reports and other actions that are submitted through CIWQS.

MAINLINE SEWER: Refers to wastewater collection system piping that is not a private lateral connection to a user.

MAINTENANCE HOLE OR MANHOLE: Refers to an engineered structure that is intended to provide access to a sanitary sewer for maintenance and inspection.

NOTIFICATION OF AN SSO: Refers to the time at which IEUA becomes aware of an SSO event through observation or notification by the public or other source.

NUISANCE: California Water Code section 13050, subdivision (m), defines nuisance as anything that meets all of the following requirements:

- a. Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
- b. Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
- c. Occurs during, or as a result of, the treatment or disposal of wastes.

PREVENTATIVE MAINTENANCE: Refers to maintenance activities intended to prevent failures of the wastewater collection system facilities (e.g. cleaning, CCTV, inspection).

PRIVATE LATERAL SEWAGE DISCHARGES – Sewage discharges that are caused by blockages or other problems within a privately owned lateral.

SANITARY SEWER OVERFLOW (SSO) - Any overflow, spill, release, discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system. SSOs include:

- (i) Overflows or releases of untreated or partially treated wastewater that reach waters of the United States;
- (ii) Overflows or releases of untreated or partially treated wastewater that do not reach waters of the United States; and
- (iii) Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.

SSOs that include multiple appearance points resulting from a single cause will be considered one SSO for documentation and reporting purposes in CIWQS.

<u>NOTE</u>: Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned are not SSOs.

SSO Categories:

- <u>Category 1</u>: Discharge of untreated or partially treated wastewater of any volume resulting from a sanitary sewer system failure or flow condition that either:
 - Reaches surface water and/or drainage channel tributary to a surface water; or
 - Reached a Municipal Separate Storm Sewer System (MS4) and was not fully captured and returned to the sanitary sewer system or otherwise captured and disposed of properly.
- <u>Category 2</u>: Discharge of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from a sanitary sewer system failure or flow condition that either:
 - Does not reach surface water, a drainage channel, or an MS4, or
 - The entire SSO discharged to the storm drain system was fully recovered and disposed of properly.
- <u>Category 3</u>: All other discharges of untreated or partially treated wastewater resulting from a sanitary sewer system failure or flow condition.

SANITARY SEWER SYSTEM: Any publicly-owned system of pipes, pump stations, sewer lines, or other conveyances, upstream of a wastewater treatment plant headworks used to collect and convey wastewater to the publicly owned treatment facility. Temporary storage and conveyance facilities (such as vaults, temporary piping, construction trenches, wet wells, impoundments, tanks, etc.) are considered to be part of the sanitary sewer system, and discharges into these temporary storage facilities are not considered to be SSOs.

SENSITIVE AREA: Refers to areas where an SSO could result in a fish kill or pose an imminent or substantial danger to human health (e.g. parks, aquatic habitats, etc.)

SEWER SERVICE LATERAL: Refers to the piping that conveys sewage from the building to IEUA's wastewater collection system.

UNTREATED OR PARTIALLY TREATED WASTEWATER: Any volume of waste discharged from the sanitary sewer system upstream of a wastewater treatment plant headworks.

WATERS OF THE STATE: Waters of the State (or waters of the United States) means any surface water, including saline waters, within the boundaries of California. In case of a sewage spill, storm drains are considered to be waters of the State unless the sewage is completely contained and returned to the wastewater collection system and that portion of the storm drain is cleaned.

4. State Regulatory Requirements for Element 6, Overflow Emergency Response Plan

State Water Resources Control Board Order No. 2006-0003-DWQ outlines requirements for an Overflow Emergency Response Plan that is a mandatory element of the Sewer System Management Plan. The collection system agency shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

- (a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- (b) A program to ensure appropriate response to all overflows;
- (c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, regional water boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the Monitoring and Reporting Program (MRP). All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board Waste Discharge Requirements or National Pollutant Discharge Elimination System (NPDES) permit requirements. The Sewer System Management Plan should identify the officials who will receive immediate notification;
- (d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (f) A program to ensure that all reasonable steps are taken to contain untreated wastewater and prevent discharge of untreated wastewater to Waters of the United States and minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

The Sewer System Management Plan and critical supporting documents are available to the public at www.ieua.org.

5. Goals

IEUA's goals with respect to responding to SSOs are as follows:

- Work safely;
- Respond quickly to minimize the volume of the SSO;
- Eliminate the cause of the SSO;
- Prevent sanitary sewer overflows or leaks from entering the storm drain system 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; and
- Revise response procedures resulting from the debrief and failure analysis of SSOs as appropriate.

6. SSO Detection and Notification

ref. SWRCB Order No. 2006-0003-DWQ D.13vi(a)

The processes that are employed to notify IEUA of the occurrence of an SSO include: observation by the public, receipt of an alarm, or observation by IEUA staff or other public employees during the normal course of their work.

IEUA operates five wastewater lift stations. In the event of any pump failure, the high-level sensor activates the SCADA alarm system and IEUA is contacted. To prevent overflow, wastewater from the wet well can either be pumped into a vacuum truck for disposal to a nearby sanitary sewer manhole, or bypassed around the station into the sanitary sewer system.

6.1 PUBLIC OBSERVATION

Public observation is the most common way that IEUA is notified of blockages and overflows. Contact numbers and information for reporting sewage overflows and backups are in the phone book and on IEUA's website: <u>http://www.ieua.org</u>. IEUA's telephone number for reporting sewer problems is (909) 993-1600. After hours callers are given instructions for contacting the On-Call Employee.

Normal Work Hours

When a report of a sewage overflow or backup is made during normal work hours, the front reception desk staff answers the call and forwards it to the Manager of Operations and Maintenance or their designee who determines if the problem is within the agency's service area. If it is not, they will refer the caller to the appropriate agency and notify that agency and offer mutual aid support. If it is, they will determine if the problem is with the agency's sever system. If it is, or if it is questionable, they will dispatch a Collections Crew.

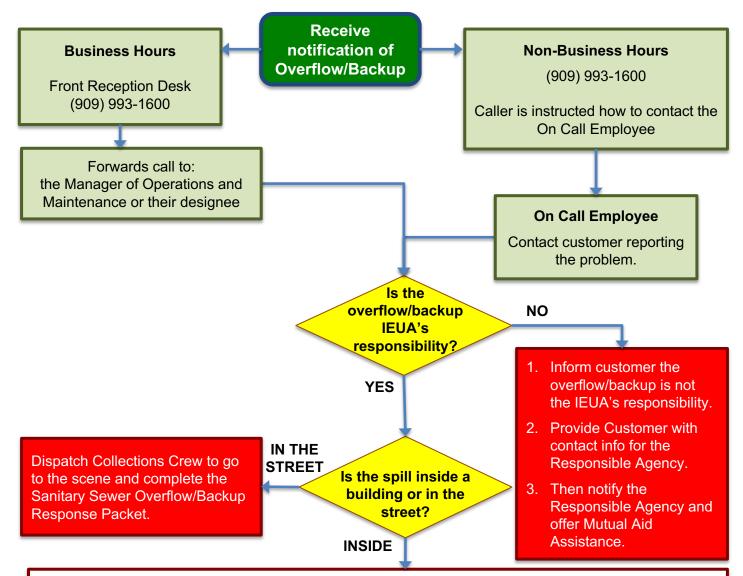
<u>After Hours</u>

After hours calls are forwarded to the Manager of Operations and Maintenance who will dispatch the On-Call Operator or other appropriate personnel.

When the Agency is notified of a potential sewer problem, the Incident Report Form is completed. The individual receiving the call will collect 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

The following is an overview of receiving a report of sewage overflow or backup report:



WHAT TO TELL THE CUSTOMER (See Field Guide for tips)

- Clearly communicate who will respond, estimated time they will arrive and what area(s) will need to be accessed.
- Clearly communicate that a blockage in the sewer main line will be promptly cleared, but that the Agency is **not allowed to work on a blockage in the property owner's/resident's service lateral line.** Use general terms that the caller can understand, and give the caller your name for future reference.
- Show concern and empathy for the property owner/resident, but do not admit or deny liability.
- Instruct the caller to turn off any appliances that use water and to shut off any faucets inside the home.
- Instruct the caller to keep all family members and pets away from the affected area.
- Instruct the caller to place towels, rags, blankets, etc. between areas that have been affected and areas that have not been affected.
- Instruct the caller to not remove any contaminated items let the professionals do this.
- Instruct the caller to turn off their HVAC system.
- Instruct the caller to move any **uncontaminated** property away from impacted areas.

Dispatch Collections Crew to go to the scene and complete the Sanitary Sewer Overflow/Backup Response Packet.

6.2 AGENCY STAFF OBSERVATION

City 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 City staff that, in turn, responds to emergency situations. Work orders are issued to correct non-emergency conditions.

6.3 CONTRACTOR OBSERVATION

The following procedures are to be followed in the event that a contractor causes or witnesses a Sanitary Sewer Overflow. If the contractor causes or witnesses an SSO they should:

- 1. Immediately notify the IEUA by calling (909) 993-1600. After hours callers to this number will instructed how to contact the On-Call Employee.
- 2. Protect storm drains
- 3. Protect the public.
- 4. Provide information to the IEUA Collections Crew such as start time, appearance point, suspected cause, weather conditions, etc.
- 5. Direct ALL media and public relations requests to the Executive Manager of External Affairs and Policy Development/AGM at (909) 993-1600.

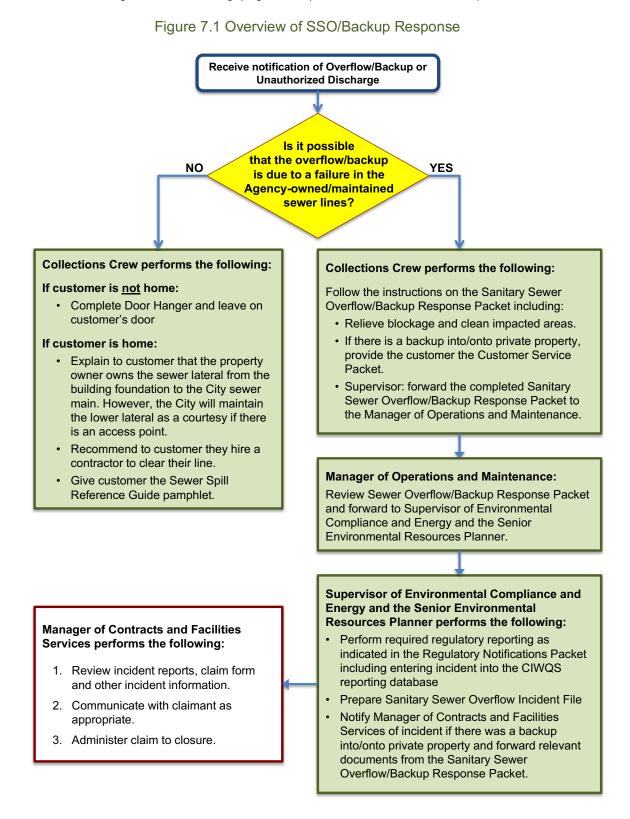
This OERP contains a Contractor Orientation flowchart (Appendix E) and flyer to educate and inform contractors and their employees about the procedures to follow in the event of an SSO.

7. SSO Response Procedures

ref. SWRCB Order No. 2006-0003-DWQ D.13vi(b)

7.1 Sewer Overflow/Backup Response Summary

IEUA will respond to SSOs as soon as feasible following notification of an overflow/backup or unauthorized discharge. The following (Figure 7.1) is an overview of the response activities.



7.2 First Responder Priorities

The first responder's priorities are:

- To follow safe work practices.
- To respond promptly with the appropriate and necessary equipment.
- To contain the spill wherever feasible.
- To restore the flow as soon as practicable.
- To minimize public access to and/or contact with the spilled sewage.
- To promptly notify the Manager of Operations and Maintenance, Supervisor of Environmental Compliance and Energy, and Senior Environmental Resources Planner in event of major SSO.
- To return the spilled sewage to the sewer system.
- To restore the area to its original condition (or as close as possible).
- To photograph and document affected and unaffected areas from a spill.

7.3 Safety

The first responder is responsible for following safety procedures at all times. Special safety precautions must be observed when performing sewer work. There may be times when IEUA personnel responding to a sewer system event are not familiar with potential safety hazards peculiar to sewer work. In such cases it is appropriate to take the time to discuss safety issues, consider the order of work, and check safety equipment before starting the job. This includes use of gas monitoring detectors for air quality in manholes and traffic controls at the site.

7.4 Initial Response

The first responder must respond to the reporting party/problem site and visually check for potential sewer stoppages or overflows.

The first responder will:

- Note arrival time at the site of the overflow/backup.
- Verify the existence of a public sewer system spill or backup.
- Determine if the overflow or blockage is from a public or private sewer.
- Identify and assess the affected area and extent of spill.
- Contact caller if time permits.
- If the spill is large or in a sensitive area, document conditions upon arrival with photographs. Decide whether to proceed with clearing the blockage to restore the flow or to initiate containment measures. The guidance for this decision is:
 - Small spills (i.e., spills that are easily contained) proceed with clearing the blockage.
 - Moderate or large spill where containment is anticipated to be simple proceed with the containment measures.
 - Moderate or large spills where containment is anticipated to be difficult proceed with clearing the blockage; however, whenever deemed necessary, call for additional assistance and implement containment measures.
- Take steps to contain the SSO. For detailed procedures refer to the Sanitary Sewer Overflow/Backup Response Packet.

7.5 Initiate Spill Containment Measures

The first responder will attempt to contain as much of the spilled sewage as possible using the following steps:

• Determine the immediate destination of the overflowing sewage.

- Plug storm drains using air plugs, sandbags, and/or plastic mats to contain the spill, whenever appropriate. If spilled sewage has made contact with the storm drainage system, attempt to contain the spilled sewage by plugging downstream storm drainage facilities.
- Contain/direct the spilled sewage using dike/dam or sandbags.
- Pump around the blockage/pipe failure.

For detailed procedures refer to the Sanitary Sewer Overflow/Backup Response Packet (Appendix B).

7.6 Restore Flow

Using the appropriate cleaning equipment, set up downstream of the blockage and hydro-clean upstream from a clear manhole. Attempt to remove the blockage from the system and observe the flows to ensure that the blockage does not reoccur downstream. If the blockage cannot be cleared within a reasonable time from arrival, or sewer requires construction repairs to restore flow, then initiate containment and/or bypass pumping. If assistance is required, immediately contact other employees, contractors, and equipment suppliers. For detailed procedures refer to the Sanitary Sewer Overflow/Backup Response Packet.

7.7 Equipment

This section provides a list of specialized equipment that is used to support this Overflow Emergency Response Plan. Standard Operating Procedures (SOPs) have been developed for all equipment requiring specialized knowledge that may be deployed as part of an emergency SSO response. The SOPs are located either with the equipment or IEUA's intranet.

- *Closed Circuit Television (CCTV) Inspection Unit* A CCTV Inspection Unit is used to determine the root cause for all SSOs from gravity sewers.
- *Camera* -- A digital or disposable camera is used to record the conditions upon arrival, during clean up, and upon departure.
- *Emergency Response Trucks* -- A utility body pickup truck, or open bed is used to store and transport the equipment needed to effectively respond to sewer emergencies. The equipment and tools include containment and clean up materials.
- *Portable Generators, Portable Pumps, Piping, and Hoses* This equipment is 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 used to clear blockages in gravity sewers, vacuum spilled sewage, and wash down the impacted area following the SSO event.
- Air plugs, sandbags and plastic mats
- SSO Sampling Kits
- *By-pass Hose Trailer*—This is a specialized trailer built specifically to store by-pass hoses, discharge/suction hose, gaskets, and trash pump in the event of larger SSOs in need of by-pass pumping.
- Portable Lights

8. Recovery and Cleanup

ref. SWRCB Order No. 2006-0003-DWQ D.13vi(e)

The recovery and cleanup phase begins immediately after the flow has been restored and the spilled sewage has been contained to the extent possible. The SSO recovery and cleanup procedures are as follows:

8.1 Estimate the Volume of Spilled Sewage

Use the methods outlined in the Sanitary Sewer Overflow/Backup Response Packet and/or the SMART Field Guide to estimate the volume of the spilled sewage. Wherever possible, document the estimate using photos and/or video of the SSO site before and during the recovery operation.

8.2 Recovery of Spilled Sewage

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

8.3 Clean-up and Disinfection

Implement clean up and disinfection procedures 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 will be modified as required for wet weather conditions. In the event that an overflow occurs at night, the location will be inspected first thing the following day. The field crew will look for any signs of sewage solids and sewage-related materials that may warrant additional cleanup activities. Where cleanup of public property is beyond the capabilities of IEUA staff, a cleanup contractor will be used.

Private Property

Affected property owners may call a water damage restoration contractor to complete the cleanup and restoration. If the overflow into private property is the definite result of IEUA system failure, the property owner may call out a water damage restoration contractor to complete the cleanup and restoration. IEUA claim forms will be issued if requested by the property owners.

Hard Surface Areas

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 and/or deozyme or similar non-toxic biodegradable surface disinfectant until the water runs clear. The flushing volume will be approximately three times the estimated volume of the spill. Take reasonable steps to contain and vacuum up the wastewater. Allow area to dry. Repeat the process if additional cleaning is required.

Landscaped and Unimproved Natural Vegetation

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 will 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 CalOES for SSOs greater than or equal to 1,000 gallons.

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.

8.4 Public Notification

Signs will be posted and barricades put in place to keep vehicles and pedestrians away from contact with spilled sewage. County Environmental Health instructions and directions regarding placement and language of public warnings will be followed as appropriate or as directed. Additionally, the Manager of Operations and Maintenance or designee will use his/her best judgment regarding supplemental sign placement in order to protect the public and local environment. Signs will not be removed until directed by County Environmental Health, Manager of Operations and Maintenance, or designee. Photographs of sign placement will be taken.

Creeks, streams and beaches that have been contaminated as a result of an SSO will be posted at visible access locations until the risk of contamination has subsided to acceptable background bacteria levels. The warning signs, once posted, will be checked at least every day to ensure that they are still in place. Photographs of sign placement will be taken.

When contact with the local media is deemed necessary, the Executive Manager of External Affairs and Policy Development/AGM or designee will provide the media with all revelvant information.

9. Water Quality

ref. SWRCB Order No. 2006-0003-DWQ D.13vi(f)

9.1 Waters of the State

The following Waters of the State are in the Inland Empire Utilities Agency's service area:

- San Antonio Creek Channel
- Cucamonga Creek
- Deer Creek
- Etiwanda Creek
- Lower Etiwanda Creek
- Chino Creek
- San Sevaine Creek
- West Cucamonga Creek
- Day Creek
- Declez Creek
- Magnolia Channel
- Cypress Channel
- Prado Lake
- Cucamonga-Guasti Park
- Hickory Basin (on West Fontana Channel)
- Unnamed Tributary south of Ontario Airport (drains to Prado Lake)

In the event that these waters are impacted by a sanitary sewer overflow, the equipment identified in Section 7.7 is available for response based on the specific SSO conditions.

9.2 Water Quality Sampling and Testing

Water quality sampling and testing will be performed as appropriate to determine the extent and impact of the SSO when spilled sewage enters a water body. The water quality sampling procedures (see Appendix D) will be implemented within 48 hours and include the following:

- The first responders will consider the need to sample surface waters the SSO may have reached. If preliminary volume estimates of the SSO are 50,000 gallons or greater, the first responders will begin collecting as soon as possible but no later than 48 hours after becoming aware of the SSO.
- The water quality samples will be collected from upstream of the spill, from the spill area, and downstream of the spill in flowing water (e.g. creeks). The water quality samples will be collected near the point of entry of the spilled sewage.
- The samples will then be brought to the IEUA Lab.

9.3 Water Quality Monitoring Plan

The IEUA Water Quality Monitoring Plan will 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. The SSO Water Quality Monitoring Plan will:

- 1. Contain protocols for water quality monitoring.
- 2. Account for spill travel time in the surface water and scenarios where monitoring may not be possible (e.g. safety, access restrictions, etc.)
- 3. Require water quality analyses for ammonia and bacterial indicators to be performed by an accredited or certified laboratory.
- 4. Require 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.
- 5. Within 48 hours of IEUA becoming aware of the SSO, require water quality sampling for ammonia and fecal coliform.
- 6. Observe proper chain of custody procedures.

9.4 SSO Technical Report

IEUA will submit an SSO Technical Report to the CIWQS Online SSO Database within 45 calendar days of the SSO end date for any SSO in which 50,000 gallons or greater are spilled to surface waters. The Manager of Planning and Environmental Resources will supervise the preparation of this report and will certify this report. This report, which does not preclude the Water Boards from requiring more detailed analyses if requested, shall include at a minimum, the following:

Causes and Circumstances of the SSO:

- Complete and detailed explanation of how and when the SSO was discovered.
- Diagram showing the SSO failure point, appearance point(s), and final destination(s).
- Detailed description of the methodology employed and available data used to calculate the volume of the SSO and, if applicable, the SSO volume recovered.

- Detailed description of the cause(s) of the SSO.
- Copies of original field crew records used to document the SSO.
- Historical maintenance records for the failure location.

IEUA's Response to SSO:

- Chronological narrative description of all actions taken by IEUA to terminate the spill.
- Explanation of how the SSMP Overflow Emergency Response Plan was implemented to respond to and mitigate the SSO.
- Final corrective action(s) completed and/or planned to be completed, including a schedule for actions not yet completed.

Water Quality Monitoring:

- Description of all water quality sampling activities conducted including analytical results and evaluation of the results.
- Detailed location map illustrating all water quality sampling points.

10. Sewer Backup Into/Onto Private Property Claims Handling Policy

It is the policy of IEUA that a claims form will be offered to anyone wishing to file a claim. The following procedures will be observed for all sewer overflows/backups into/onto private property:

- IEUA staff will offer an IEUA claim form irrespective of fault whenever a property owner requests a claim form. The claim may later be rejected if subsequent investigations into the cause of the loss indicate IEUA was not at fault.
- It is the responsibility of the Collections Crew to gather information regarding the incident and notify the Manager of Operations and Maintenance or designee.
- It is the responsibility of the IEUA Manager of Contracts and Facilities Services to review all claims and to oversee the adjustment and administration of the claim to closure.

11. Notification, Reporting, Monitoring and Recordkeeping Requirements *ref. SWRCB Order No. 2006-0003-DWQ D.13vi(c)*

In accordance with the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SSS GWDRs), the Inland Empire Utilities Agency maintains records for each sanitary sewer overflow. Records

- Documentation of response steps and/or remedial actions
- Photographic evidence to document the extent of the SSO, field crew response operations, and 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 discharged and/or volume recovered were calculated including all assumptions made.

Regulator required notifications are outlined in Section 11.1 on the following page.

include:

11.1 Regulator Required Notifications

ELEMENT	REQUIREMENT	METHOD
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, IEUA will notify the California Office of Emergency Services (CalOES) and obtain a notification control number.	Call Cal OES at: (800) 852-7550
REPORTING	 Category 1 SSO: IEUA 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: IEUA 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: IEUA will submit certified report within 30 calendar days of the end of month in which SSO the occurred. SSO Technical Report: IEUA 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: IEUA 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: IEUA will update and certify every 12 months 	Enter data into the CIWQS Online SSO Database ¹ (http://ciwqs.waterboards.ca.gov/) certified by the Legally Responsible Official(s) ² . 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 RECORD KEEPING	IEUA will conduct water quality sampling within 48 hours after initial SSO notification for Category 1 SSOs in which 50,000 gallons or greater are spilled to surface waters. IEUA will maintain the following records: • SSO event records.	Water quality results will be uploaded into CIWQS for Category 1 SSOs in which 50,000 gallons or greater are spilled to surface waters. Self-maintained records shall be available during inspections or
	 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. 	upon request.

¹ In the event that the CIWQS online SSO database is not available, the Supervisor of Environmental Compliance and Energy or the Senior Environmental Resources Planner will notify SWRCB by phone in accordance with the time schedules identified above. In such an event, IEUA 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 file.

² IEUA always has at least one LRO. Any change in the LRO(s) including deactivation or a change to contact information, will be submitted to the SWRCB within 30 days of the change by calling (866) 792-4977 or emailing help@ciwqs.waterboards.ca.gov.

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 that 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.

11.2 Complaint Records

IEUA maintains records of all complaints received whether or not they result in sanitary sewer overflows using the Customer Complaint Record (Appendix F) including the following information:

- 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 state
- 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
- Documentation of all feasible and remedial actions taken

Complaint records will be maintained for a minimum of five years whether or not they resulted in an SSO.

12. Post SSO Event Debriefing

ref. SWRCB Order No. 2006-0003-DWQ D.13vi(d)

Every SSO event is an opportunity to evaluate the IEUA response and reporting procedures. Each overflow event is unique, with its own elements and challenges including volume, cause, location, terrain, climate, and other parameters.

As soon as possible after Category 1 and Category 2 SSO events, all of the participants, from the person who received the call to the last person to leave the site, will meet to review the procedures used and to discuss what worked and where improvements could be made in preventing or responding to and mitigating future SSO events. The results of the debriefing will be documented and tracked to ensure the action items are completed as scheduled.

13. Failure Analysis Investigation

ref. SWRCB Order No. 2006-0003-DWQ D.13vi(d)

The objective of the failure analysis investigation is to determine the "root cause" of the SSO and to identify corrective action(s) needed that will reduce or eliminate future potential for the SSO to recur or for other SSOs to occur.

The investigation will include reviewing all relevant data to determine appropriate corrective action(s) for the line segment. The investigation will include:

• Reviewing and completing the Sanitary Sewer Overflow Report and any other documents related to the incident

- Reviewing the incident timeline and other documentation regarding the incident
- Reviewing communications with the reporting party and witness
- Reviewing 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
- Reviewing past CCTV records,
- Conducting a CCTV inspection to determine the condition of all line segments immediately following the SSO and reviewing the video and logs,
- Reviewing any Fats, Oils, and Grease (FOG) related information or results
- Posting SSO debrief records
- Conducting interviews with the public at the SSO location

The product of the failure analysis investigation will be the determination of the root cause and the identification and scheduling of the corrective actions. The Collection System Failure Analysis Form will be used to document the investigation.

14. SSO Response Training

ref. SWRCB Order No. 2006-0003-DWQ D.13vi(d)

This section provides information on the training that is required to support this Overflow Emergency Response Plan.

14.1 Initial and Annual Refresher Training

All IEUA personnel who may have a role in responding to, reporting, and/or mitigating a sewer system overflow will receive training on the contents of this OERP. All new employees will receive training before they are placed in a position where they may have to respond. Current employees will receive annual refresher training on this plan and the procedures to be followed. IEUA will document all training.

Affected employees will receive annual training on the following topics by knowledgeable trainers:

- IEUA's Overflow Emergency Response Plan and Sanitary Sewer Management Plan
- Sanitary Sewer Overflow Volume Estimation Techniques
- Researching and documenting Sanitary Sewer Overflow Start Times
- Impacted Surface Waters: Response Procedures
- State Water Resources Control Board Employee Knowledge Expectations
- Employee Core Competency Evaluations on Sanitary Sewer Operations
- Water Quality Sampling Plan

IEUA will verify that annual safety training requirements are current for each employee, and that employees are competent in the performance of all core competencies. This will be verified through means such as electronic testing, interviews and observations. IEUA will address, through additional training/instruction, any identified gaps in required core competencies.

Through SWRCB Employee Knowledge Expectations training the employee will be able to answer the

following:

- 1. Please briefly describe your name and job title.
- 2. Please describe for us approximately when you started in this field and how long you have worked for your agency.
- 3. Please expand on your current position duties and role in responding in the field to any SSO complaints.
- 4. Please describe your SOPs used to respond/mitigate SSOs when they occur.
- 5. Describe any training your agency provides or sends you to for conducting spill volume estimates.
- 6. We are interested in learning more about how your historical SSO response activities have worked in the field. We understand from discussions with management earlier that you use the OERP from the SSMP. Please elaborate on how you implement and utilize the procedures in the plan.
- 7. Historically, before any recent changes, can you please walk us through how you would typically receive and respond to any SSO complaints in the field?
- 8. Can you tell us who is responsible for estimating SSO volumes discharged? If it is you, please describe how you go about estimating the SSO volume that you record on the work order/service request forms?
- 9. What other information do you collect or record other than what is written on the work order form?
- 10. Describe if and when you ever talk with people that call in SSOs (either onsite or via telephone) to further check out when the SSO might have occurred based on what they or others know? If you do this, can you tell us where this information is recorded?
- 11. We understand you may be instructed to take pictures of some sewer spills/backups into structures. Other than these SSOs, when else would you typically take any pictures of an SSO?
- 12. Please walk us through anything else you'd like to add to help us better understand how your field crews respond and mitigate SSO complaints.

14.2 SSO Response Drills

Periodic training drills or field exercises will 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, and lateral blockage). The results and the observations during the drills will be recorded and action items will be tracked to ensure completion.

14.3 SSO Training Record Keeping

Records will 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 will include date, time, place, content, name of trainer(s), and names and titles of attendees.

14.4 Contractors Working On Agency Sewer Facilities

All construction contractors working on IEUA sewer facilities will be required to develop a projectspecific OERP, provide project personnel with training regarding the content of the contractor's OERP and their role in the event of an SSO, and follow that OERP in the event that they cause or observe an SSO. Emergency response procedures shall be discussed at project pre-construction meetings, regular project meetings and after any contractor involved incidents. All service contractors will be required to observe contractor procedures. See Appendix E: Contractor Orientation.

15. Authority

- Health & Safety Code Sections 5410-5416
- CA Water Code Section 13271
- Fish & Wildlife Code Sections 5650-5656
- State Water Resources Control Board Order No. 2006-0003-DWQ
- State Water Resources Control Board Order No. WQ 2013-0058-EXEC effective September 9, 2013

16. References

- Sanitary Sewer Overflow and Backup Response SMART Field Guide, 2013, DKF Solutions Group, LLC
- Appendix A: Regulatory Notifications Packet
- Appendix B: Sanitary Sewer Backup Packet
- Appendix C: Sanitary Sewer Overflow Packet
- Appendix D: Field Sampling Kit
- Appendix E: Contractor Orientation

Appendix A

REGULATORY NOTIFICATIONS PACKET

Regulatory Notifications Packet

Instructions:

- 1. Receive notification of a Sanitary Sewer Overflow.
- 2. Open this packet.
- 3. Refer to the Regulatory Reporting Guide (A-1) for instructions.
- 4. Use the SSO Reporting Checklist for the appropriate category of spill (A-2a or A-2b) to document that all notifications are made according to the reporting schedule.

Contents:

<u>Form</u>	<u>Page Number</u>
Regulatory Reporting Guide	A-1
Reporting Checklist: Category 1	2a
Reporting Checklist: Categories 2 and 3	2b

Print on 6"x9" envelope

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Regulatory Notifications Packet: Regula

Deadline

			A-1	
ory Notifications Packet:	Regulatory Report	ing Guide	Side A	
Reporting Instructions				
See reverse side for contact information and definitions of the categories of spills of untreated or partially treated wastewater from publicly owned sanitary sewer system				
Category 1	Category 2	Category 3		
 If the SSO is greater than or equal to 1,000 gallons, call CalOES at (800) 852-7550 Consider notifying the County Health Department and/or Local Flood Control District as a courtesy if the SSO may impact their operations. 	Consider notifying the County Health Department and/or Local Flood Control District as a courtesy if the SSO may impact their operations.	Consider notifying the County Health Department and/or Local Flood Control District as a courtesy if the SSO may impact their operations.	-	

	Category 1	Category 2	Category 3	
2 hours after awareness of SSO	 If the SSO is greater than or equal to 1,000 gallons, call CalOES at (800) 852-7550 Consider notifying the County Health Department and/or Local Flood Control District as a courtesy if the SSO may impact their operations. 	Consider notifying the County Health Department and/or Local Flood Control District as a courtesy if the SSO may impact their operations.	Consider notifying the County Health Department and/or Local Flood Control District as a courtesy if the SSO may impact their operations.	-
48 Hours after awareness of SSO	If 50,000 gal or more will likely reach receiving waters, begin water quality sampling and initiate impact assessment	-	-	-
3 Days after awareness of SSO	Submit Draft Spill Report in the CIWQS* database	Submit Draft Spill Report in the CIWQS* database	-	-
15 Days after SSO end date	Certify Spill Report in CIWQS*. Update as needed until 120 days after SSO end date	Certify Spill Report in the CIWQS* database. Update as needed until 120 days after SSO end date	-	-
30 Days after end of calendar month in which SSO occurred	-	-	Certify Spill Report in the CIWQS* database. Update as needed until 120 days after SSO end date	-
45 days after SSO end date	If 50,000 gal or more were spilled to surface waters, submit SSO Technical Report using CIWQS*	-	-	-

- * In the event that the CIWQS online SSO database is not available, notify the State Water Resources Control Board (SWRCB) by phone or email until the CIWQS online SSO database becomes available. See contact information on Side B.
- Note: For reporting purposes, if one SSO event results in multiple appearance points, complete one SSO report in the CIWQS SSO Online Database, and report the location of the SSO failure point, blockage or location of the flow condition that caused the SSO, in the CIWQS SSO Online Database, including all the discharge points associated with the SSO event.

Regulatory Notifications Packet Regulatory Reporting Guide

Contact Information

Contact	Telephone/Email
CalOES (California Governor's Office of Emergency Services)	(800) 852-7550
San Bernardino County Environmental Health Services	Business Hours: (800) 782-4264 After Hours: (800) 472-2376
Flood Control Districts	cms.sbcounty.gov/dpw/FloodControl/DistrictZones.aspx
Santa Ana Regional Water Quality Control Board (SARWQCB)	(951) 782-4130 spillreportR8@waterboards.ca.gov
State Water Resources Control Board (SWRCB): Permit/Reporting Information: Armando Martinez Inspection/Enforcement Information: Jim Fischer	(916) 341-5586 Armando.Martinez@waterboards.ca.gov (916) 341-5548 Jim.Fischer@waterboards.ca.gov

Authorized Personnel:

The following are authorized to perform regulatory reporting of SSOs:

- Supervisor of Environmental Compliance and Energy
- Manager of Planning and Environmental Resources (LRO*)
- Executive Manager of Engineering/AGM (LRO*)

*IEUA's Legally Responsible Officials (LROs) are authorized to electronically sign and certify SSO reports in CIWQS.

Definitions of SSO Categories

The response crew will complete the SSO Report form in the SSO Packet to document how the category was determined.

Category	Definition
Category 1:	 Discharge of untreated or partially treated wastewater of any volume resulting from a sanitary sewer system failure or flow condition that either: Reaches surface water and/or drainage channel tributary to a surface water; or Reached a Municipal Separate Storm Sewer System (MS4) and was not fully captured and returned to the sanitary sewer system or otherwise captured and disposed of properly.
Category 2:	 Discharge of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from a sanitary sewer system failure or flow condition that either: Does not reach surface water, a drainage channel, or an MS4, or The entire SSO discharged to the storm drain system was fully recovered and disposed of properly.
Category 3:	All other discharges of untreated or partially treated wastewater resulting from a sanitary sewer system failure or flow condition

Inland Empire Utilities Agency: Overflow Emergency Response Plan

Regulatory Notifications Packet Category 1 SSO Reporting Checklist

Use this Checklist for Category 1 SSOs only

STEP 1: Receive notification of Sanitary Sewer Overflow.

STED 2.				
51EP 2:		qual to 1,000 gallons and reaches ES within 2 hours of the time IEUA		e discharged
	fy CalOES at (800) 852-7550:			
0	Date Called:			
0	Time called:	:□AM	□PM	
0	CalOES Control number:			
City	personnel making notifications:	Name:	Title:	
STFP 3:	Within 48-Hours after a	wareness of SSO		
0.2. 0.				
Only	if 50,000 gallons or more spille	ed to surface waters, implement W	ater Quality Monitoring Plan.	
STEP 4:	Within 3 Days after awa	areness of SSO		
□ Subr	nit a Draft Spill Report using th	e CIWQS online reporting databas	;e.	
☐ Subr	nit a Draft Spill Report using th	e CIWQS online reporting databas	e.	
	nit a Draft Spill Report using the Within 15 Days after re e		e.	
STEP 5:	Within 15 Days after re	sponse conclusion		
STEP 5:	Within 15 Days after recently the Spill Report using the	sponse conclusion	se.	
STEP 5:	Within 15 Days after recently the Spill Report using the	sponse conclusion	se.	oonse.
STEP 5:	Within 15 Days after reacted of the Spill Report using the spill Report may be	sponse conclusion ne CIWQS online reporting databat made for up to 120 days following	se.	oonse.
STEP 5:	Within 15 Days after recently the Spill Report using the	sponse conclusion ne CIWQS online reporting databat made for up to 120 days following	se.	oonse.
STEP 5:	Within 15 Days after re- certify the Spill Report using thates to the Spill Report may be Within 45 Days after SS	sponse conclusion ne CIWQS online reporting databat made for up to 120 days following	se. the conclusion of the SSO Resp	
STEP 5: LRO Upda STEP 6: <u>If 50.</u> report	Within 15 Days after re- certify the Spill Report using th ates to the Spill Report may be Within 45 Days after SS 000 gallons or more spilled to s	sponse conclusion ne CIWQS online reporting databas made for up to 120 days following SO end date	se. the conclusion of the SSO Resp	

Inland Empire Utilities Agency: Overflow Emergency Response Plan

Regulatory Notifications Packet Category 2 & 3 SSO Reporting Checklist

A-2b

Use this Checklist for Category 2 and 3 SSOs only

STEP 1: Receive notification of Sanitary Sewer Overflow

STEP 2: Submit Draft Spill Report (Category 2 only)

□ Submit a Draft Spill Report using the CIWQS online reporting database within 3 days after awareness of Category 2 SSO.

STEP 3: Certify Spill Report

LRO certify the Spill Report using the CIWQS online reporting database:

- Category 2 SSO: Within 15 days after the conclusion of the response
- Category 3 SSO: Within 30 days after the end of the calendar month in which the SSO occurred

Updates to the Spill Report may be made for up to 120 days following the conclusion of the SSO Response.

This form completed by: _

Name

Title

Date

Appendix B

SANITARY SEWER OVERFLOW/BACKUP RESPONSE PACKET

Inland Empire Utilities Agency: Overflow Emergency Response Plan

Sanitary Sewer Overflow/Backup Response Packet Table of Contents

<u>Form</u>	Form Number
Response Instructions	
Sanitary Sewer Overflow/Backup Response Flowchart	
Start Time Determination Form	2
Volume Estimation Methods	
Eyeball Estimation	3a
Duration and Flow Rate Photo Comparison	3b
Upstream Lateral Connections	3c
Sewer Overflow Report	4
Lateral CCTV Report	5
Bubbled Toilets Letter	
Declination of Cleaning Services (3-copy NCR)	7
First Responder Form	8
Lodging Authorization Form (3-copy NCR)	
Rejection of Relocation Recommendation (3-copy NCR)	
Claims Submittal Checklist	
Collection System Failure Analysis Form	

Customer Service Packet

Instructions	packet envelope
Customer Information	
Claim Form	2
Sewer Spill Reference Guide	pamphlet

Regulatory Notifications Packet

Instructions	envelope
Regulatory Reporting Guide	À-1
Category 1 SSO Reporting Checklist	
Category 2 & 3 SSO Reporting Checklist	2b

Print Instructions/Chain of Custody on 9" x 12" envelope.

Sanitary Sewer Overflow/Backup Response Packet

- □ If this is a Category 1 SSO greater than or equal to 1,000 gallons, advise contacts below to make the 2-hour CalOES notification.
- □ If this is a backup into a residence or business, request that the customer cease all activities contributing to the backup.

Notifications Trigger:	Contact Immediately at (909) 993-1600 (unless listed below)				
For Category 1 SSO greater than or equal to	Supervisor of Environmental Compliance and Energy				
1,000 gallons contact CalOES within 2 hours	Manager of Planning and Environmental Resources				
For all backups into/onto private property possibly due to problems in the public sewer	Manager of Operations and Maintenance				
For any media requests	Executive Manager of External Affairs and Policy Development/AGM				
For cleaning services	SERVPRO of Chino / Chino Hills: (909) 548-3191				
(restoration/remediation)	SERVPRO of Northeast Ontario / Kaiser: (909) 390-0238				

Collections Crew:

00								
	Follow the instructions on the Sewer Overflow/Backup Response Flowchart (B-1). Note: If multiple dwelling units are affected, use one packet per unit and check here:	Print Name:						
	If indicated on the flowchart, give the customer the Bubbled Toilets Letter and/or the Customer Service Packet and have them initial here: <i>Customer acknowledgement of receipt of Bubbled Toilets Letter:</i> <i>Customer acknowledgement of receipt of Customer Service Packet:</i> Supervisor : Place completed forms in this envelope, complete the Chain of Custody record (right) and forward this packet to the Manager of Operations and Maintenance.	Initial: Date: Time:						
Ma C		Print Name: Initial: Date: Time:						
Sei C	Supervisor of Environmental Compliance and Energy and the Print Name: Output Complete the Regulatory Notifications Packet. Print Name: Output Complete the Claims Submittal Checklist. Initial: Date: Output Complete the Chain of Custody record (right) and forward this packet to the Manager of Contracts and Facilities Services. Date: Time: Debrief using the Collection System Failure Analysis Form. Description Description							
Ма	Manager of Contracts and Facilities Services: Refer to the Claims Submittal Checklist.							

B-1 Side A Print on 8.5" x 14" paper

Does the

SSO/backup appear

to be due to a problem in the **IEUA-**

owned/maintained

sewer line?

YES

Consider the need to call out additional staff. contractor or

mutual aid assistance or to

notify upstream users to

curtail water use.

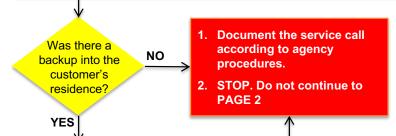
Start Here Take necessary measures to prevent sewage from entering storm drains. If the SSO/PLSD is entering an area where public contact may occur, post warning signs in immediate areas and document how many signs were posted and where they were posted. Consider isolating the affected area to prevent access by vehicles/pedestrians. Photograph/videotape areas where warnings/barricades are posted, as appropriate.

NO

1. Determine whether IEUA should clear the stoppage/blockage or have the property owner/manager use a private contractor. Be sure to document IEUA staff time and equipment used for potential billing purposes. Always notify the property owner/manager/resident of the Private Lateral Sewage Discharge (PLSD) and any agency actions taken.

 \rightarrow

- 2. Photograph and document <u>all</u> evidence that this SSO is from private property.
- If tenant or property owner is unable or unwilling to address the cause of the overflow, immediately contact your supervisor and discuss whether Code Enforcement, the County Department of Environmental Health or Regional Water Quality Control Board should be notified.

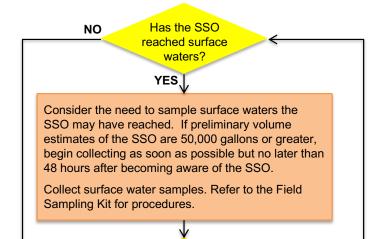


If customer is <u>not</u> home:

- Contact the Manager of Operations and Maintenance to discuss contacting the property owner/manager (using customer billing information) to gain entry if necessary.
- Complete Door Hanger and leave on customer's door.
- · Leave a message on the customer's voicemail.

If customer is home:

- · Recommend the customer shut off any appliances using water.
- Explain to customer that the blockage is in their lateral and that IEUA does not have legal authority to maintain or perform work on privately owned laterals. Consider showing the customer the unobstructed flow in the public sewer to help explain that the blockage is in their lateral.
- Consider cleaning the IEUA-owned/maintained line manhole to manhole and other lines that may tie in to the main line.
- Recommend to customer they hire a contractor to clear their line.
- Give customer the Sewer Spill Reference Guide pamphlet.



If preliminary volume estimates indicate it is a Category 1 SSO greater than or equal to 1,000 gallons, immediately call one of the individuals on the front of the Sewer Overflow/Backup Response Packet envelope to make the 2-hour notification to CalOES.

BEGIN DIVERSION AND CONTAINMENT

1. DIVERT AWAY FROM SENSITIVE AREAS:

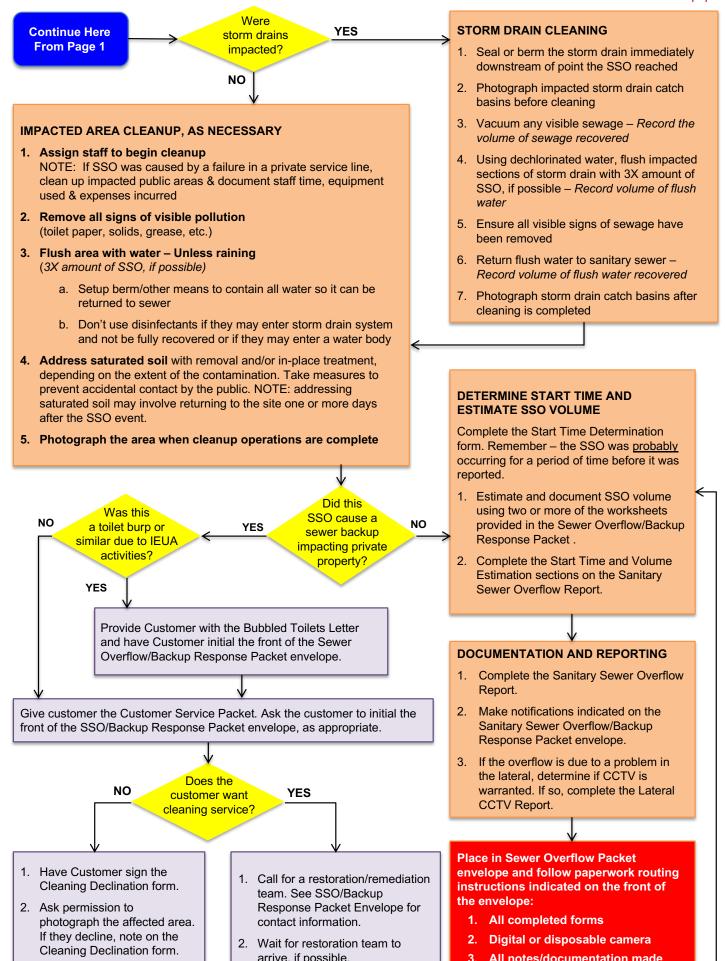
- Cover unplugged storm drains w/mats, or use dirt/other material to divert sewage away from sensitive areas (e.g., schools, playgrounds, intersections, etc.)
- b. ENSURE PUBLIC CONTACT DOES NOT OCCUR. Use cones/barricades to isolate area.

2. CONTAIN SSO & RETURN TO SYSTEM, IF POSSIBLE:

- a. Plug storm drain catch basins or use rubber mats to cover basin inlet and divert flow to catch basin
- b. Build/excavate a berm to channel flow to downstream sanitary sewer manhole (*barricade manhole if left open*)
- c. Use bypass pumps to pump around blockage until it can be removed
- d. Divert to low area of ground where it can be collected later
- 3. PHOTOGRAPH HOW THE SSO WAS DIVERTED/CONTAINED, AS APPROPRIATE

ADDRESS CAUSE OF SSO/BACKUP

For pump station-related SSO/Backups contact the Manager of Operations and Maintenance for assistance, and refer to the Pump Station Emergency Response Plan.



Inland Empire Utilities Agency:	Overflow Emergency Response Plan	
-	w/Backup Response Packet termination Form	B-2
SSO Start Date: Loca	tion:	
being even one minute off can have a huge in	tial part of SSO volume estimation. Depending or npact on the volume estimation. Be as precise as me must be based on all available information (inf	possible. Do
What time was the Agency notified of the SSC	D?	AM PM
Who notified the Agency?		
Did they indicate what time they noticed the S	SO? □ YES □ NO If yes, what time?	AM PM
Who at the Agency received the notification?		
What time did the crew arrive at the site of the	e SSO?	O AM PM
Who was interviewed regarding the start time statement they provided:	of the SSO? Include their name, contact informat	ion, and the
Name Contact Information	n Statement	
Describe in detail how you determined the sta	art time for this particular SSO:	
SSO Start Date: SSO End Date:	SSO End Time:	I □ PM I □ PM utes
This form completed by: Name: Job Title:		

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Inland Empire Utilities Agency: Overflow Emergency Response Plan

Sanitary Sewer Overflow/Backup Response Packet Volume Estimation: Eyeball Estimation Method

Use this method only for small SSOs of less than 200 gallons.

SSO Date: _____ Location: _____

- STEP 1: Position yourself so that you have a vantage point where you can see the entire SSO.
- STEP 2: Imagine one or more buckets or barrels of water tipped over. Depending on the size of the SSO, select a bucket or barrel size as a frame of reference. It may be necessary to use more than one bucket/barrel size.
- STEP 3: Estimate how many of each size bucket or barrel it would take to make an equivalent spill. Enter those numbers in Column A of the row in the table below that corresponds to the bucket/barrel sizes you are using as a frame of reference.
- STEP 4: Multiply the number in Column A by the multiplier in Column B. Enter the result in Column C.

	А	В	С
Size of bucket(s) or barrel(s)	How many of this size?	Multiplier	Estimated SSO Volume (gallons)
1 gallon water jug		x 1 gallons	
5 gallon bucket		x 5 gallons	
32 gallon trash can		x 32 gallons	
55 gallon drum		x 55 gallons	
Other: gallons		x gallons	

STEP 5: Is rainfall a factor in the SSO? □Yes □No

If yes, what volume of the observed spill volume do you estimate is rainfall? ______ gallons If yes, describe how you determined the amount of rainfall in the observed spill?

STEP 6: Calculate the estimated SSO volume by subtracting the rainfall from the SSO volume:

gallons ·		<u>gallons</u> =	gallons	
Estimated SSO Volume	Rainfall	-	Total Estimated SSO Volume	

Do you believe that this method has estimated the entire SSO? □Yes □No

If no, you MUST use additional methods to estimate the entire SSO. If yes, it is advisable to use additional methods to support the estimation. Explain why you believe this method has/has not estimated the entire SSO:

This worksheet completed by:	
Name:	Signature:
Job Title:	Date:

Inland Empire Utilities Agency: Overflow Emergency Response Plan

Sanitary Sewer Overflow/Backup Response Packet Volume Estimation: Area/Volume Estimation Method B-3b Page 1

Note: Refer to form B-3b Page 3 for computation formulas and guides

SSO Date: _____ Location: _____

- STEP 1: Describe spill area surface:
 Asphalt
 Concrete
 Dirt
 Landscape
 Inside Building
 Other:
- STEP 2: Draw/sketch the outline (footprint) of the spill. Then break the footprint down into recognizable shapes. Refer to the example on form B-3b Page 3.

STEP 3: Calculate the area of the footprint by completing the table below for each shape in Step 2. If two shapes overlap, select one of the two shapes and estimate the percentage of that shape that does not overlap. Enter that percentage in the % Not Overlapping column. This will ensure that the overlap area is only counted once. Refer to the example on form B-3b Page 3.

Rectangles	Length	Χ	Width	Χ	% Not Overlapping*	=	Area
	ft	Х	ft	Х	%	=	ft ²
	ft	Х	ft	Х	%	=	ft ²
	ft	Х	ft	Х	%	=	ft ²

Triangles	Base	Χ	Height	Multiplier	X	% Not Overlapping*	=	Area
	ft	Х	ft	÷ 2	Х	%	=	ft ²
	ft	Х	ft	÷2	Х	%	=	ft ²
	ft	Х	ft	÷ 2	Х	%	=	ft ²

Circles	π	Χ	Radius	Χ	Radius	Χ	% Not Overlapping*	=	Area
	3.14	Х	ft	Х	ft	Х	%	=	ft ²
	3.14	Х	ft	Х	ft	Х	%	=	ft ²
	3.14	Х	ft	Х	ft	Х	%	Ш	ft ²

Total Spill Area (sum of all three tables above):

Sanitary Sewer Overflow/Backup Response Packet Volume Estimation: Area Volume Estimation Method

- STEP 4: Calculate the volume of the spill that <u>was NOT absorbed</u> into the ground. If the entire spill was absorbed, skip to Step 5.
 - a. If spill is of varying depths, take several measurements at different depths and find the average.

inches ÷		= inches	÷	12 =	feet
sum of measurements	# of measurements	average depth in inches			average depth in feet of ponded sewage

b. Calculate spill volume of ponded sewage in cubic feet by multiplying the Total Spill Area in Step 3 by the average depth calculated in Step 4a. Convert from cubic feet to gallons by multiplying by 7.48.

- STEP 5: Calculate the volume of the spill that <u>was absorbed</u> into the ground. If only a wet stain is observed, use the guidelines on B-3b Page 3 for the average depth. When estimating the volume that was absorbed, take into consideration:
 - How long the sewage has been sitting
 - The air temperature on the day of the SSO
 - Soil type for the area (e.g., hard-packed clay vs. loose or gravely soil)

When estimating the volume of the spill that was absorbed into the ground, it is also advisable to dig down far enough to reach dry soil and take the depth of the wet soil into consideration.

Estimated volume that was absorbed into the soil: ______ gallons Explain how this estimation was determined:

STEP 6: Add the volume not absorbed (Step 4) plus the volume absorbed (Step 5) to get the total estimated volume:

gallons+gallons=gallonsvolume not absorbedvolume absorbedTotal Estimated Spill Volume

Do you believe that this method has estimated the entire SSO? \Box Yes \Box No If no, you MUST use additional methods to estimate the entire SSO. If yes, it is advisable to use additional methods to support the estimation. Explain why you believe this method has/has not estimated the entire SSO:

This worksheet completed by:	
Name:	Signature:
Job Title:	Date:

Sanitary Sewer Overflow/Backup Response Packet Volume Estimation: Area Volume Estimation Method

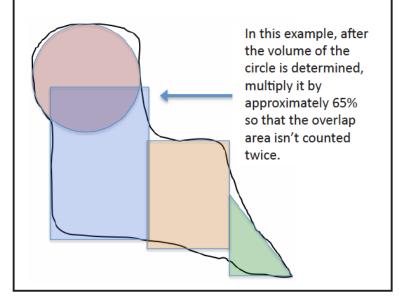
B-3b Page 3

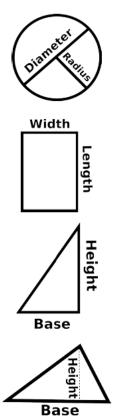
Miscellaneous Computations

To convert inches to feet	Divide the inches by 12 or use the chart on the bottom right of this page.			
Volume of one cubic foot	7.48 gallons of water			
Area: Two-dimensional measurement represented in square feet	Square/rectangle:Area = Length x WidthCircle:Area = πr^2 (where $\pi \approx 3.14$ and r = radius = $\frac{1}{2}$ diameter)Triangle:Area = $\frac{1}{2}$ (Base x Height)			
Volume: Three-dimensional measurement represented in cubic feet	Rectangle/square footprint:Volume = Length x Width x DepthCircle footprint (cylinder):Volume = $\pi r^2 x$ DepthTriangle footprint:Where $\pi \approx 3.14$ and $r = radius = \frac{1}{2}$ diameter)Volume = $\frac{1}{2}$ (Base x Height) x Depth			
Depth: Contained or "Ponded" sewage	Measure actual depth of standing sewage whenever possible. When depth varies, measure several representative sample points and determine the average. Add the depth of the sample points and then divide that total by the number of sample points.			
	 If the depth is not measurable because it is only a wet stain, consider using the following estimated depths: Depth of a wet stain on concrete surface: 0.0026' (1/32") Depth of a wet stain on asphalt surface: 0.0013' (1/64") 			

Example of how to draw/sketch the outline (footprint) of the spill for Step 2:

- 1. Sketch the outline of the spill (black line).
- 2. Break the sketch down into recognizable shapes (circles, squares, etc.) as well as you can.





	Convert				
Inches	Inches to Feet				
Inches	Feet				
1/8"	0.01'				
1/4"	0.02'				
3/8"	0.03'				
1/2"	0.04'				
5/8"	0.05'				
3/4"	0.06'				
7/8"	0.07'				
1"	0.08'				
2" 3"	0.17'				
	0.25'				
4"	0.33'				
5"	0.42'				
6"	0.50'				
7"	0.58'				
8"	0.67'				
9"	0.75'				
10"	0.83'				
11"	0.92'				
12"	1.00'				

Sanitary Sewer Overflow/Backup Response Packet Volume Estimation: Upstream Lateral Connections Method

SSO Date:

Location:

- STEP 1: Determine the number of Equivalent Dwelling Units (EDUs) for this SSO: _____ EDUs NOTE: A single-family residential home = 1 EDU. For commercial buildings, refer to agency documentation.
- STEP 2: This volume estimation method utilizes daily usage data based on flow rate studies of several jurisdictions in California. Column A shows how an average daily of usage of 180 gallons per day is distributed during each 6-hour period. Adjust the table as necessary to accurately represent the actual data.

Complete Column E by entering the number of minutes the SSO was active during each 6-hour time period. Multiply column D times Column E to calculate the gallons spilled during each time period. Add the numbers in Column F together for the Total Estimated SSO Volume per EDU.

		Flow Ra	ate Per EDL	SSO		
	Α	В	С	D	E	F
	Gallons	Hours	A÷B=	C÷60 =	Minutes SSO	D × E =
Time Period	per Period	per period	Gallons per Hour	Gallons per Minute	was active during period	Gallons spilled per period
6am-noon	72	6	12	0.20		
noon-6pm	36	6	6	0.10		
6pm-midnight	54	6	9	0.15		
midnight-6am	18	6	3	0.05		

STEP 3: Multiply the Estimated SSO Volume per EDU from Step 2 by the number of EDUs from Step 1.

gailons		 galions
Volume per EDU	# of EDUs	Estimated SSO Volume

STEP 4: Adjust SSO volume as necessary considering other factors, such as activity that would cause a fluctuating flow rate (doing laundry, taking showers, etc.). Explain rationale below and indicate adjusted SSO estimate (attach a separate page if necessary):

Estimated SSO Volume: gallons

Do you believe that this method has estimated the entire SSO? \Box Yes \Box No If no, you MUST use additional methods to estimate the entire SSO. If yes, it is advisable to use additional methods to support the estimation. Explain why you believe this method has/has not estimated the entire SSO:

This worksheet completed by:	
Name:	Signature:
Job Title:	Date:

Sanitary Sewer Overflow/Backup Response Packet Sanitary Sewer Overflow Report

CIWQS Assigne	d Number:			
SSO Category (d	heck one):			
Category 1:	Discharge of untreated or partially treated wastewater of any condition that either (1) Reaches surface water and/or draina Separate Storm Sewer System (MS4) and was not fully capter and disposed of properly.	ge channel tributary to a surface v	vater; OR (2)	Reached a Municipal
Category 2:	Discharge of untreated or partially treated wastewater greate system failure or flow condition that either (1) Does not reach SSO discharged to the storm drain system was fully recovered	surface water, a drainage channe		
Category 3:	All other discharges of untreated or partially treated wastewa	ter resulting from a sanitary sewe	⁻ system failu	re or flow condition
Spill from Priv	ate Lateral (specify): Single Family Home Multi-Family Food Service Establishment (FSE) Mixed Use Proper Public quasi-public institution (hospital, schools, fire depar	ty 🛛 Industrial Property 🗍 Co		perty
IMMEDIATE NOT	IFICATION: If this is a Category 1 SSO \geq 1,000 gallor	ns, contact CalOES within 2	hours at (8	00) 852-7550.
A. SSO LOCAT	ION			
SSO Location Na	ame:			
Latitude Coordin	ates [*] : Longitud	e Coordinates:		
Street Name and	I Number:			
Nearest Cross S	treet: City:	Zip	Code:	
County:	SSO Location Description:			
		wallow wafe with Field Origina		
	IPTION (Complete Volume Estimation Worksheets a			
□ Lateral Cl □ Lower La	e Point (check one or more): □ Combined Sewer D.I. (eanout (Private) □ Lateral Cleanout (Public) □ Insid teral (Private) □ Lower Lateral (Public) □ Uppe wer System Structure (specify):	e Building or Structure 🗆 Man	e Main hole er Lateral (F	□ Gravity Mainline □ Pump Station Public)
	ple appearance points? □ No □ Yes, number of app	earance points:		
Did the SSO rea	ch a drainage channel and/or surface water? \square Yes (C	ategory 1) □No		
	ed a storm sewer, was it fully captured and returned to	-	□No (Cate	gory 1)
	m a private lateral? □ Yes □No If YES, name of res			
□ Other:	ation: □ Ocean/ocean beach* □ Surface waters of m drain □ Combined storm drain □ Paved surface) of affected drainage channels, beach, etc.:	her than ocean		 Building/structure Street/curb/gutter
Total Estimated	SSO volume (in gallons – 1,000gal or more = Category	1):		gallons
Est. volume that re	ached a separate storm drain that flows to a surface water boo	y: gal	Recovered:	gal
Est. volume that re	ached a drainage channel that flows to a surface water body:	gal	Recovered:	gal
Est. volume discha	rged directly to a surface water body:	gal	Recovered:	gal
Est. volume discha	rged to land:	gal	Recovered:	gal
Calc. Methods: I □Other (describe	□Eyeball □Photo Comparison □Upstream Lat. Conne ∋):	ections	e sketch/ph	oto with dimensions)
C. SSO OCCUR	RING TIME (complete Start Time Determination For	m and then complete inform	ation below	w)
Estimated SSO s	start date:	Estimated SSO start time:		
Date SSO report	ed to sewer crew:	Time SSO reported to sewe	r crew:	
Date sewer crew	arrived:	Time sewer crew arrived:		
Who was intervie	ewed to help determine start time?			
Estimated SSO e	end date:	Estimated SSO end time:		

^{*} If multiple appearance points, use the GPS coordinates for the location of the SSO appearance point closest to the failure point/blockage. © 2004-2018 DKF Solutions Group All rights reserved.

Inland Fm	nire Utilities	Agency:	Overflow	Fmergency	/ Response Plan
		geneyi	0,0110,0	Line gene	

Sanitary Sewer Overflow/Backup Response Packet Sanitary Sewer Overflow Report

B-4 Side B

D. CAUSE OF SSO

Where did failure occur? (Check all that apply): Air Relief or Blow-Off Valve Deriver Deriver Main Deriver Mainline Deriver De
SSO cause (check all that apply): Air Relief or Blow-Off Valve Failure Construction Diversion Failure CS Maintenance Damage by others Debris (specify): Ofrom Construction Ofrom Lateral OGeneral ORags Flow Exceeded Capacity FOG (Fats, oil, and grease) Inappropriate Discharge Natural Disaster Operator Error Root Intrusion Pipe Structural Problem/Failure Pipe Structural Problem/Failure (Installation) Rainfall Exceeded Design Pump Station Failure (specify): Ocontrols OMechanical OPower Siphon Failure Vandalism Surcharged Pipe Non - Dispersible Wipes Other (specify): Other (specify): Other (specify):
Diameter (in inches) of pipe at point of blockage/spill cause (if applicable):
Sewer pipe material at point of blockage/spill cause (if applicable):
Estimated age of sewer asset at the point of blockage or failure (if applicable):
Description of terrain surrounding point of blockage/spill cause: Flat Mixed Steep
E. SSO RESPONSE
SSO response activities (check all that apply): Cleaned-Up Mitigated Effects of Spill Contained All or Portion of Spill Restored Flow Property Owner Notified Other Enforcement Agency Notified (specify) SSO response completed (date & time):
Visual inspection result of impacted waters (if applicable):
Any fish killed? □ Yes □ No Any ongoing investigation? □ Yes □ No
Were health warnings posted? Yes No If yes, provide health warning/beach closure posting/details: If yes, take photographs of sign placement.
Was there a beach closure? Yes No If yes, name of closed beach(es):
Were samples of impacted waters collected? □ Yes □ No If YES, select the analyses: □ DO □ Ammonia □ Bacteria □ pH □ Temperature □ Other:
Recommended corrective actions: (check all that apply and provide detail) Add sewer to preventive maintenance program Adjust schedule/method of preventive maintenance Enforcement action against FROG source Inspect Sewer Using CCTV to Determine Cause Plan rehabilitation or replacement of sewer Repair Facilities or Replace Defect Other (specify)
What major equipment was used in the response?
List all agency personnel involved in the response including name, title and their role in the response:
F. NOTES

G. NOTIFICATION DETAILS		
CalOES contacted date and time (if applicable):		
CalOES Control Number (if applicable):	Spoke to:	
This form prepared by: NAME:	TITLE:	DATE:
This form reviewed by: NAME:	TITLE:	DATE:

Place completed form in the Sanitary Sewer Overflow/Backup Response Packet Envelope and follow routing instructions. © 2004-2018 DKF Solutions Group All rights reserved.

Sanitary Sewer Overflow/Backup Response Packet Lateral CCTV Report

PLEASE COMPLETE AS THOROUGHLY AS POSSIBLE			
PERSON COMPLETING THIS FORM:	DATE: PHONE:		
CAMERA TYPE:	LOCATION OF CAMERA ENTRY:		
AFFECTED PROPERTY STREET ADDRESS:	LOCATION OF CAMERA STOP:		
CITY, STATE AND ZIP:	DESCRIBE AREA TV'd:		
PHONE	UPSTREAM MANHOLE #:		
WEATHER AT TIME OF CCTV WORK:			
PLEASE CHECK ALL THAT WERE DISCOVERED – Describe Extent &	TIME OF OVERFLOW:		
Location Using Camera Entry Point As Reference:	TIME BLOCKAGE RELIEVED:		
Broken Lateral – Describe:	TIME LATERAL TV'd:		
Depth:	DEPTH OF LATERAL:		
🗖 Roots – Severity: 🗆 Light 🗆 Moderate 🗆 Heavy			
🗖 Grease – Severity: 🗆 Light 🗆 Moderate 🗆 Heavy	RECOMMENDED FOLLOW UP WORK ACTIONS:		
Sag – Describe:			
Depth:			
BPD – Describe:			
Location:			
Cleanout – Describe:			
Location:			
Joint/Junction – Describe:			
Depth			
Grade – Describe:			
🗖 Grit – Severity: 🗆 Light 🛛 Moderate 🛛 Heavy			
□ Other – Describe:			
Mark for USA location? Yes No Lateral Locations Marked in Green Paint? Yes No			
SIGNATURE OF EMPLOYEE PERFORMING CCTV WORK:	DATE		

Place completed form in the Sanitary Sewer Overflow/Backup Response Packet Envelope and follow routing instructions. © 2004-2018 DKF Solutions Group All rights reserved.

Sanitary Sewer Overflow/Backup Response Packet Bubbled Toilets Letter

B-6

Dear Inland Empire Utilities Agency (IEUA) Customer,

Thank you for informing us that your toilet bubbled while our crews were working in proximity of your property. We apologize for the inconvenience and hope that this letter will answer some of your questions about bubbling toilets.

1. Is this a health risk?

The water that came out of your toilet is potable water from the toilet bowl. Unless your toilet was in use when this occurred, this water is no different than that encountered while cleaning your toilet.

2. What is IEUA doing in the street?

In order to insure reliable sewer service, IEUA inspects, cleans, and repairs its sewer system on a continuous basis.

3. How does sewer cleaning cause my toilet to bubble?

Typical industry cleaning equipment uses high-pressure water to clean sewers. The first step is to use the high-pressure water jets to propel the hose and cleaning nozzle upstream as far as 800 feet. During this process, air within the main pipe is displaced and sometimes goes up the private lateral pipe and releases though the toilet. This can also happen during the cleaning phase, when high-pressure water is pulled downstream to the cleaning truck.

4. What causes the air to come from my toilet?

Over the years, IEUA crews have found that the bubbling of toilets has many causes, some of which are:

- Obstructed vent pipes;
- Vent pipes that are positioned too far from the toilet;
- Lateral pipes that may be in use as the crew is cleaning (e.g. draining washing machine, draining bathtub, etc.);
- Lateral pipes that may have obstructions that are causing them to hold water (e.g. roots, grease, etc.).

5. What does IEUA staff do, once informed of a bubbling toilet?

Once notified of a bubbling toilet, the crew leader explains to you what has happened, and checks to see if there is a clean-out in your yard that could be opened in the future during cleaning.

6. What can I do to prevent my toilet from bubbling?

When a sewer begins to drain slowly, it may be a sign that it needs to be cleaned or repaired. Trees and shrubs may have root structures that are entering the lateral pipe. The homeowner needs to make sure to have a clean-out for accessing the line. Unless there is a cleanout on the property line, it is the homeowner's responsibility to keep the sewer lateral pipe in good working condition. **IEUA also recommends the homeowner install a back-flow prevention device to prevent bubbling or sewer back-ups into the home.**

It is always a good idea to keep the toilet lid down when not in use, and not install carpets in the bathroom unless they can be easily removed and cleaned. For more information, please call the IEUA office at (909) 993-1600.

Sincerely,

Inland Empire Utilities Agency

Sanitary Sewer Overflow/Backup Response Packet **Declination of Sewage Cleaning Services**

Customer Information					
NAME:			ADDRESS:		TELEPHONE:
ON	AT	Approximately	GALLONS OF:		
(date)	(time)	(quantity)	-	,	Odor
			□ Other (describe):		
Overflowed	from (or ode	or emanating from)	The overflow affected the following areas	(check one):
□ Toil				□ Bathroom □ Bedroom	()-
□ Sho	wer/Tub			Hallway Garage	
🗆 Was	sher			□ Kitchen □ Crawlspace	
□ Oth	er (describe):			□ Other (specify):	
The overflo	w affected th	e following floorir	ig: and/or addi	tional materials:	
🗆 Tile		Wood Flooring	🗆 Area F	8	
□ Linole		Carpet	🗆 Clothii	ng 🛛 Other (specify):	
니 Other	(specify):				
Were photos taken?: Yes No If yes, where are photos stored?					
This Form	Completed B	y: Name:		Date:	
(Writ	e legibly)	Title:		Time:	

CUSTOMER, please read the following and sign below. Please refer to the Customer Service Packet for whom to contact if you have any questions.

I/We acknowledge that Inland Empire Utilities Agency, CA (IEUA) has offered to provide professional cleaning and decontamination services to remediate the sewage backup and/or overflow described above and that we declined the offer. We further understand and acknowledge that because we have declined, any necessary remediation activities will be conducted without IEUA assistance, and that IEUA will not accept responsibility for work performed by persons other than those engaged by IEUA. IEUA will also not accept responsibility for any charges related to this incident that are not usual and customary.

Customer Signature*:	Date:	
The information above was explained to the customer by the	Name:	Title:
following employee:	Signature:	Date:

*Note to responders: if customer declines to sign this form, then have a co-worker sign here as a witness: Name: Signature:

Recommendations to customer to clean up the spill:

Date:

- Keep pets and children out of the affected area
- Turn off heating/air conditioning systems
- Wear rubber boots, rubber gloves, and goggles during cleanup of the affected area.
- Remove and discard items that cannot be washed and disinfected (such as: mattresses, rugs, cosmetics, baby toys, etc.)
- Remove and discard drywall and insulation that has been contaminated with sewage or flood waters.
- Thoroughly clean all hard surfaces (such as flooring, concrete, molding, wood and metal furniture, countertops, appliances, sinks and other plumbing fixtures) with hot water and laundry or dish detergent.
- Help the drying process with fans, air conditioning units, and dehumidifiers.
- After completing cleanup, wash your hands with soap and water. Use water that has been boiled for 1 minute (allow water to cool before washing your hands.) OR use water that has been disinfected (solution of 1/8 teaspoon of household bleach per 1 gallon of water). Let it stand for 30 min. If water is cloudy, use 1/2 teaspoon of household bleach per 1 gallon of water.
- Wash all clothes worn during the cleanup in hot water and detergent (wash separately from uncontaminated clothes).
- Wash clothes contaminated with flood or sewage water in hot water and detergent. Use a laundromat for washing large quantities of clothes and linens until your onsite wastewater system has been professionally inspected and services.
- Seek immediate attention if you become injured or ill.

Distribution Instructions: Top Copy to IEUA records; Middle Copy to IEUA Manager of Contracts and Facilities Services; Bottom Copy to Customer

Sanitary Sewer Overflow/Backup Response Packet First Responder Form

B-8 Side A

Fill out this form as completely as possible.

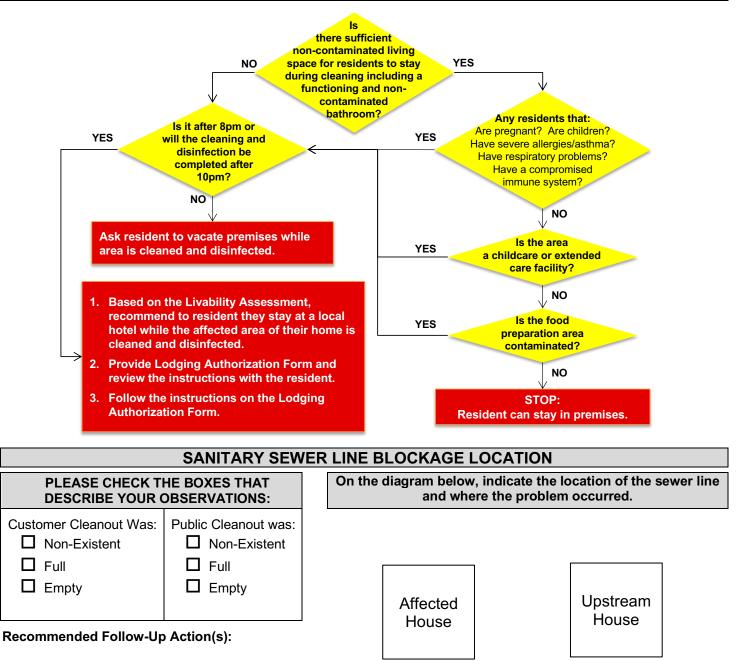
Ask customer if you may enter the home. If so, take photos of all damaged and undamaged areas.

P	HONE:	
Name: DA		
т	ME:	
□ No		
F RENT,		
PROPERTY MANAGER(S)):	
OWNER:		
STREET ADDRESS:		
CITY, STATE AND ZIP:		
PHONE:		
n/fixture that overflowed?	□ Yes □ No	
athrooms:	# of Rooms Affected:	
oximate Time Sewage Has	Been Sitting (hrs/days):	
Numbers of Photographs or Videos Taken: Where are photos/video st Photographs Video		
Does property have a Property Line Cleanout or BPD?		
If yes, was the Property Line Cleanout/BPD operational at the time of the overflow?		
)	□ YES □ NO □ Unknown	
□ YES □ NO		
	D T D T T D T D T T D T D T D T D T D T	

GO TO SIDE B

Sanitary Sewer Overflow/Backup Response Packet First Responder Form

LIVABILITY ASESSMENT



Did sewage go under buildings? □ Yes □ No □ Unsure

B-8

Side B

Place completed form in the Sanitary Sewer Overflow/Backup Response Packet Envelope and follow routing instructions.

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Sanitary Sewer Overflow/Backup Response Packet Lodging Authorization Form

INSTRUCTIONS TO EMPLOYEE:

- 1. If the Livability Assessment indicates that a hotel is needed, offer alternate lodging to the customer. If they agree, ask the customer which hotel identified below they prefer.
- 2. Contact the Supervisor or their designee who will pay for one (1) night's lodging with an IEUA credit card.
- 3. Review this form with the customer and instruct them to read the Instructions to Resident section below.
- 4. Instruct the customer that this emergency authorization is for LODGING ONLY NO FOOD, MINIBAR, MOVIE, PHONE or Other Charges).
- 5. Explain to customer that if circumstances require additional nights' lodging and other incidentals, the IEUA Manager of Contracts and Facilities Services will address them.
- 6. Have the customer sign the Acknowledgement section of this form.
- 7. Complete this Authorization Form and sign.
- 8. Give the bottom copy of this form to the customer.
- 9. If the customer declines the offer of temporary relocation, complete the Rejection of Relocation Recommendation form.

INSTRUCTIONS TO RESIDENT: Inland Empire Utilities Agency, CA recommends that you tempora	arily relocate to
one of the hotels listed below for your safety and convenience while your residence is being cleaned. P	lease note that
this emergency authorization is granted under the following conditions:	

- 1. This authorization provides for one (1) night's lodging at one of the hotels listed below.
- 2. The authorization is good for **room and tax ONLY**. Phone, food, mini-bar and other incidental charges will be your responsibility.
- 3. Additional nights/other allowances/incidentals may be discussed by contacting the IEUA Manager of Contracts and Facilities Services at (909) 993-1600 Monday through Friday.

CUSTOMER ACKNOWLEDGEMENT:

I/we have read and understood the terms and conditions governing this offer of temporary relocation and agree to abide by them as described above.

Customer Name (please print):					
Customer Address:					
Phone # where custor	mer may be reached:				
Customer Signature:		Date:			
✤ If you wish to decli	<u>ne</u> this offer of temporary relocation, sign the Reje	ection of Relocation Red	commendation form.		
Good for one (1) night	ťs stay on (date):	Number of affected	residents:		
Field Supervisor's Na	Field Supervisor's Name: Phone Number:				
HOTEL OPTION 1: La Quinta Inn and Suites 3555 Inland Empire Boulevard, Ontario, CA 91764-4908 Telephone: (909) 476-1112 Pets allowed. Some rooms have microwaves and mini refrigerators.					
HOTEL OPTION 2: Comfort Suites 1811 East Holt Boulevard., Ontario, CA, 91761 Telephone: (909) 605-0700 Only service animals allowed. Smoke free hotel. Rooms have microwaves and mini refrigerators.					
HOTEL OPTON 3:	Azure Hotel and Suites 1945 E. Holt Boulevard, Ontario, CA 91761 Telephone: (909) 284-8670 Some rooms have microwaves and mini refrigera	ators.			
Distribution: Top Co	py to: City records Middle Copy to: IEUA Manager of Contr	acts and Facilities Services	Bottom Copy to Customer		

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B-9

Sanitary Sewer Overflow/Backup Response Packet Rejection of Relocation Recommendation Form

On, (date)	, a backup into structure occurred at	(address)
Property Owner:		_
Resident:		_

B-10

Due to a backup into the structure, the above listed property has sewage to be cleaned up/mitigated, which may also include remediation of part of the structure. It is recommended by Inland Empire Utilities Agency, CA that the residents of the above listed property relocate until the cleanup/mitigation and any required remediation is completed. City staff provided the information to the resident: "Your Responsibilities as a Private Property Owner."

Resident(s) determined that they did not want to relocate and will remain in the structure.

PROPERTY OWNER/RESIDENT RELEASE OF LIABILITY AND ASSUMPTION OF RISK

I have decided that I do not want to relocate from the address listed above during any cleanup/mitigation and/or remediation. I have received all the materials listed above from Inland Empire Utilities Agency, CA. I understand that there are inherent risks with exposure to sewage that may contain pathogens and the associated cleanup/mitigation and/or remediation process due to the potential for coming into contact with sewage through breathing, swallowing, or cuts and abrasions in the skin. Risks may range from (1) minor temporary discomfort and illness, (2) more serious illness that may require medical treatment, (3) very serious illness that could result in life threatening conditions, including death. I know, understand, and appreciate these and other risks inherent in being exposed to sewage. I knowingly assume all such risks which may result from my own actions, inactions, or negligence of others, and the condition of the structure during the cleanup/mitigation and/or remediation process.

I, for myself, my heirs, personal representative or assigns, hereby release, discharge and hold harmless Inland Empire Utilities Agency, CA, its respective Boards, officers, employees, agents and contractors from any and all claims, actions, causes of action, demands, rights, damages, costs, loss of service, expenses, legal expenses, including subrogation or liens or damage caused by or related to my remaining in the structure while cleanup/mitigation and/or remediation is performed as a result of the sewer backup.

Resident Signature	Date	
Inland Empire Utilities Agency, CA Witness		
Comments:		

Distribution Instructions: Top Copy to City records; Middle Copy to IEUA Manager of Contracts and Facilities Services; Bottom Copy to Customer

Sanitary Sewer Overflow/Backup Response Packet Claims Submittal Checklist **B-11**

Complete this form if there is a Sanitary Sewer Backup into/onto Private Property

Supervisor of Environmental Compliance and Energy and Senior Environmental Resources Planner

1. Complete the following information:

Title:	
Name:	
Phone:	
Today's Date:	

- 2. Copy the items listed below and retain the originals for internal archiving purposes.
- 3. Place the originals back in the Sanitary Sewer Overflow/Backup Response Envelope:

Form B-7: Declination of Cleaning Services

Form B-8: First Responder Form

G Form B-9: Lodging Authorization Form

Form B-10: Rejection of Relocation Recommendation

Form B-11: Claims Submittal Checklist (this form)

Any other information you feel is important in this claim

- 4. Verify claims packet is complete.
- 5. Notify Manager of Contracts and Facilities Services of incoming claim and forward the completed claims packet to them.

Manager of Contracts and Facilities Services

- 1. Review incident reports, claim form and other incident information.
- 2. Communicate with claimant as appropriate.
- 3. Administer claim to closure.

Sanitary Sewer Overflow/Backup Response Packet Collection System Failure Analysis

To be completed by the Supervisor of Environmental Compliance and Energy and Senior Environmental Resources Planner

B-12

Side A

Incident Report #		Prepared By				
SSO/Backup Information						
Event Date/Time		Address				
Volume Spilled		Volume Recovere	d			
Cause						
Summary of Historical S	SOs/Ba	ckups/Service Cal	lls/Other Problems			
Date	Cause		Date Last Cleaned	Crew		
Records Reviewed By:			Record Review Date:			
Summary of CCTV Inform	nation					
CCTV Inspection Date			Tape Name/Number	r		
CCTV Tape Reviewed By		CCTV Review Date	CCTV Review Date			
Observations						

Sanitary Sewer Overflow/Backup Response Packet Collection System Failure Analysis

Recommendations							
\checkmark	Туре	Specific Actions	Who is Responsible?	Completion Deadline	Who Will Verify Completion?		
	No Changes or Repairs Required	n/a	n/a	n/a	n/a		
	Repair(s)						
	Construction						
	Capital Improvement(s)						
	Change(s) to Maintenance Procedures						
	Change(s) to Overflow Response Procedures						
	Training						
	Misc.						
Comments/Notes:							
Re	Reviewed by: Review Date:						

Customer Service Packet

Contents:

<u>Form</u>	Form Number
Customer Information Letter	CS-1
Claim Form	CS-2
Sewer Spill Reference Guide	pamphlet

Instructions:

- 1. Review the Customer Information letter to determine actions that need to be taken <u>immediately</u>.
- 2. See the Customer Information letter for information about filing a claim.
- 3. Review the Sewer Spill Reference Guide pamphlet.

Cleaning Contractor:

SERVPRO of Chino / Chino Hills: (909) 548-3191, OR

SERVPRO of Northeast Ontario / Kaiser: (909) 390-0238

This packet provided by:

Name:

Title:

Telephone:

If you have any questions call (909) 993-1600 and speak with: Manager of Operations and Maintenance regarding sewer backup issues Manager of Contracts and Facilities Services regarding claim issues

> Print on 6" x 9" envelope © 2004-2018 DKF Solutions Group, LLC. All rights reserved.

Sanitary Sewer Overflow/Backup Response Packet Customer Information Regarding Sewer Backup Claims

Dear Property Owner:

We recognize that sewer backup incidents can be stressful and require immediate response while all facts concerning how an incident occurred are still unknown. Rest assured that we do all we can to prevent this type of event from occurring in the first place. Nevertheless, occasionally tree roots or other debris in the sewer lines causes a backup into homes immediately upstream of the blockage. At this time Inland Empire Utilities Agency (IEUA) is investigating the cause of this incident.

CS-1

If IEUA is found to be responsible for the incident, we are committed to cleaning and restoring your property, and to protecting the health of those affected during the remediation process.

The cleaning contractor provided by IEUA has been selected because of their adherence to established protocols that are designed to assure to all parties thorough, cost-effective and expeditious cleaning services. You also have the right to select your own cleaning contractor, but IEUA does not guarantee payment of fees/expenses incurred and reserves the right to dispute fees/expenses deemed not usual and customary.

The IEUA Manager of Contracts and Facilities Services has the responsibility for processing any claims for damages that are submitted. If you wish to discuss this matter, or submit a claim for damages, please contact the IEUA Manager of Contracts and Facilities Services at (909) 993-1600.

What you need to do now:

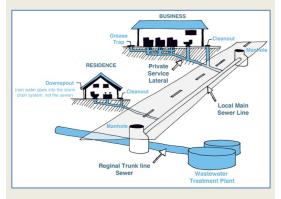
IEUA has prepared this brief set of instructions to help you minimize the impact of the loss by responding promptly to the situation.

- Do not attempt to clean the area yourself, let the cleaning and restoration company handle this.
- Keep people and pets away from the affected area(s).
- Turn off any appliances that use water.
- Turn off heating/air conditioning systems.
- Do not remove items from the area the cleaning and restoration company will handle this.
- If you had recent plumbing work done, contact your plumber or contractor and inform them of this incident.
- If you intend to file a claim, do so as soon as practical in order to have your claim considered. Submit your completed claim form to the IEUA Manager of Contracts and Facilities Services, 6075 Kimball Avenue, Chino, CA 91708. They can be reached at (909) 993-1600 Monday through Friday.

INSERT CLAIM FORM

How a Sewer System Works

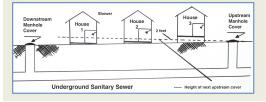
A property owner's sewer pipes are called *service laterals* and are connected to larger local main and regional trunk lines. Service laterals run from the connection at the home to the connection with the public sewer. These laterals are the responsibility of the property owner and must be maintained by the property owner.



Is my home required to have a backflow prevention device?

Section 710.1 of the Uniform Plumbing Code (U.P.C.) states: "Drainage piping serving fixtures which have flood level rims located below the elevation of the next upstream manhole cover or private sewer serving such drainage piping <u>shall</u> be protected from backflow of sewage by installing an approved type of backwater valve." The intent of Section 710.1 is to protect the building interior from mainline sewer overflows or surcharges.

Additionally, U.P.C. 710.6 states: "Backwater valves **shall** be located where they will be accessible for inspection and repair at all times and, unless continuously exposed, shall be enclosed in a masonry pit fitted with an adequately sized removable cover."



If you have a sewage spill from your private sewer line that impacts storm drains, waterways or public property, contact:

Inland Empire Utilities District (909) 993-1600

San Bernardino County Environmental Health

Business Hours:(800) 782-4264After Hours:(800) 472-2376California Health and Safety Code, Sections 5410-5416requires:

- No person shall discharge raw or treated sewage or other waste in a manner that results in contamination, pollution, or a nuisance.
- Any person who causes or permits a sewage discharge to any state waters:
 - Must immediately notify the local health agency of the discharge.
 - Shall reimburse the local health agency for services that protect the public's health and safety.
 - Who fails to provide the required notice to the local health agency is guilty of a misdemeanor and shall be punished by a fine (between \$500-\$1,000) and/or imprisonment for less than one year.

Santa Ana Regional Water Quality Control Board (951) 782-4130

Requires the prevention, mitigation, response to, and reporting of sewage spills.

California Governor's Office of Emergency Services (CalOES) (800) 852-7550

800) 852-7550

California Water Code, Article 4, Chapter 4, Sections 13268-13271 & California Code of Regulations, Title 23, Division 3, Chapter 9.2, Article 2, Sections 2250-2260 require:

- Any person who causes or permits sewage in excess of 1,000 gallons to be discharged to state waters shall immediately notify the Office of Emergency Services.
- Any person who fails to provide the notice required by this section is guilty of a misdemeanor and shall be punished by a fine (less than \$20,000) and/or imprisonment for not more than one year.

Sewer Spill Reference Guide

Your Responsibilities as a Private Property Owner

Provided to you by:

Inland Empire Utilities District

6075 Kimball Avenue Chino, CA 91708 (909) 993-1600

www.ieua.org

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How do sewage spills happen?

Sewage spills occur when the wastewater in underground pipes overflows through a manhole, cleanout, or broken pipe. Most spills are relatively small and can be stopped and cleaned up quickly, but left unattended they can cause health hazards, damage to homes and businesses, and threaten the environment, local waterways, and beaches.

CAUTION!

When trying to locate a sewer problem, <u>never</u> open manholes or other public sewer structures. Only our crews are allowed to open & inspect these structures.

Common causes of sewage spills

- Grease build-up
- Tree roots
- Broken/cracked pipes
- Missing or broken cleanout caps
- Undersized sewers
- Groundwater/rainwater entering the sewer system through pipe defects and illegal connections

Prevent most sewage backups with a Backflow Prevention Device

This type of device can help prevent sewage backups into homes and businesses. If you don't already have a Backflow Prevention Device, contact a professional plumber or contractor to install one as soon as possible.

Protect the environment!

If you let sewage from your property discharge to a gutter or storm drain, you may be subject to penalties and/or outof-pocket costs for clean-up and enforcement efforts. A property owner may be charged for costs incurred by agencies responding to spills from private properties.

What to look for:

Sewage spills can be a very noticeable gushing of water from a manhole or a slow water leak that may take time to be noticed. Don't dismiss unaccounted-for wet areas. Look for:

- Drain backups inside the building.
- Wet ground and/or water leaking around manhole lids onto your street.
- Leaking water from cleanouts or outside drains
- Unusual odorous wet areas: sidewalks, external walls, ground/landscape around a building.

The following are indicators of a possible obstruction in your sewer line:

- Water comes up in floor drains, showers or toilets.
- Toilets, showers or floor drains below ground level drain very slowly.

What to do if there is a spill:

Immediately notify IEUA. Our crews locate the blockage and determine if it is in the public sewer. If it is, the crew removes the blockage and arranges for cleanup. If the backup is in your private internal plumbing or in the private service laterals, <u>you are required to immediately</u>:

- Control and minimize the spill by shutting off or not using the water
- Keep sewage out of the storm drain system using sandbags, dirt and/or plastic sheeting
- Call a plumbing professional to clear blockages and make repairs as needed. Look in the yellow pages under "Plumbing Drain & Sewer Cleaning" or "Plumbing Contractors."
- Always notify your sewer/public works department or public sewer district of sewage spills.

Spill cleanup inside the home:

For large clean ups, a professional cleaning firm should be contacted to clean up impacted areas, You can locate local firms by looking in the Yellow Pages under "Water Damage" or "Fire Damage." If you hire a contractor, it is recommended to get estimates from more than one company. Sometimes, homeowner's insurance will pay for the necessary cleaning due to sewer backups. Not all policies have this coverage, so check with your agent.

If you decide to clean up a small spill inside your home, protect yourself from contamination by observing the following safety measures. Those persons whose resistance to infection is compromised should not attempt this type of clean up.

Other Tips:

- Keep children and pets out of the affected area until cleanup has been completed.
- Turn off heating/air conditioning systems
- Wear rubber boots, rubber gloves, and goggles during cleanup of the affected area.
- Discard items that cannot be washed and disinfected (such as: mattresses, rugs, cosmetics, baby toys, etc.)
- Remove and discard drywall and insulation that has been contaminated with sewage or flood waters.
- Thoroughly clean all hard surfaces (such as flooring, concrete, molding, wood and metal furniture,

countertops, appliances, sinks and other plumbing fixtures) with hot water and laundry or dish detergent.

- Help the drying process with fans, air conditioning units, and dehumidifiers.
- After completing cleanup, wash your hands with soap and water. Use water that has been boiled for 1 minute (allow the water to cool before washing your hands) OR use water that has been disinfected (solution of 1/8 teaspoon of household bleach per 1 gallon of water). Let it stand for 30 min. If water is cloudy, use ¼ teaspoon of household bleach per 1 gallon of water.
- Wash clothes worn during cleanup in hot water and detergent (wash apart from uncontaminated clothes).
- Wash clothes contaminated with sewage in hot water and detergent. Consider using a Laundromat until your onsite wastewater system has been professionally inspected and serviced.
- Seek immediate attention if you become injured or ill.

Spill cleanup outside the home:

- Keep children and pets out of the affected area until cleanup has been completed.
- Wear rubber boots, rubber gloves, and goggles during cleanup of affected area.
- Clean up sewage solids (fecal material) and place in properly functioning toilet or double bag and place in garbage container.
- On hard surfaces areas such as asphalt or concrete, it is safe to use a 2% bleach solutions, or ½ cup of bleach to 5 gallons of water, but don't allow it to reach a storm drain as the bleach can harm the environment.
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- Seek immediate attention if you become injured/ill.

Appendix C Service Vehicle Documents

Overflow Emergency Response Plan Public Posting

DANGER

RAW SEWAGE • AVOID CONTACT





AGUA CONTAMINADA • EVITE TODO CONTACTO

Inland Empire Utilities Agency, CA

Business Hours: (909) 993-1600 After Hours follow instructions to contact the On-Call Employee

Inland Empire Utilities Agency (IEUA)

On (date) _____, at (location)

we responded to a reported blockage of the sanitary sewer service to your property.

We discovered a blockage in:

- □ The sanitary sewer main and cleared the line
- □ The IEUA-maintained portion of your sanitary sewer lateral and cleared the line.
- Your portion of the sanitary sewer lateral, which is your responsibility to maintain. We also found IEUA's portion of the lateral and the main to be flowing normally.

If you require assistance to clear your portion of the lateral you can look in the Yellow Pages of your telephone book or on the Internet for "Sewer Contractors" or "Plumbing Drains & Sewer Cleaning." If you plan to hire a contractor we recommend getting estimates from more than one company.

IEUA representative notes: _____

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IEUA representative:

For questions or comments, please call Inland Empire Utilities Agency, CA

Business Hours: (909) 993-1600 After Hours:

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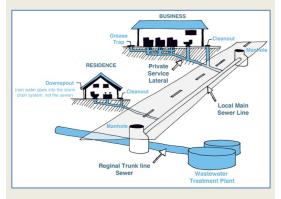
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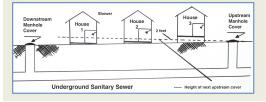
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- Seek immediate attention if you become injured/ill.

Appendix D

FIELD SAMPLING KIT

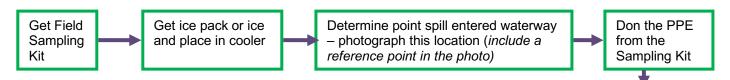
Field Sampling Kit Table of Contents

Form	<u>Form Number</u>
Procedures for Sampling Receiving Waters and Posting	
Warnings after a Sewage Spill	D-1
Sample Collection Chain of Custody Record	2

Go to Lab and get the following:

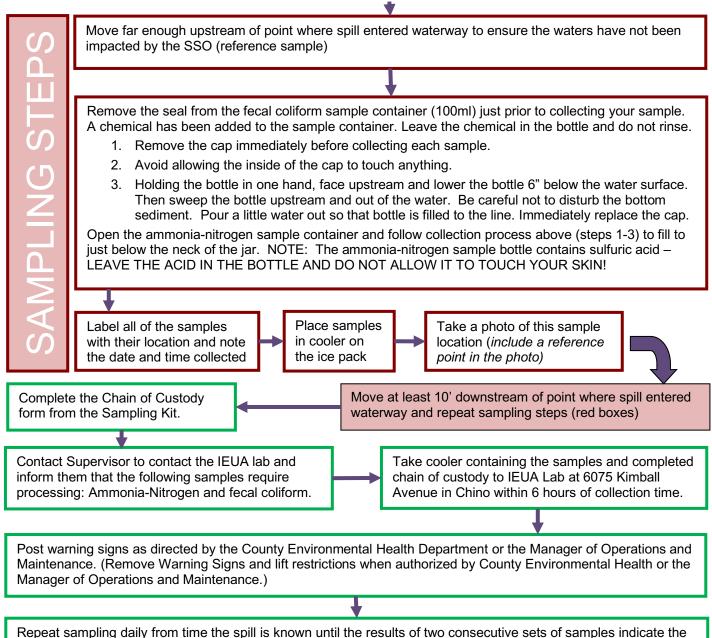
- Ice pack
- Ice
- Sample pole
- Latex gloves
- Long rubber gloves
- Safety glasses
- Waterproof Pen (i.e. Sharpie[®])
- Chain of Custody form

Field Sampling Kit Procedures for Sampling Receiving Waters and Posting Warnings after a Sewage Spill Side A



D-1

- Collect all samples against the direction of the water flow! (face upstream)
- Collect upstream sample first!
- Collect samples well away from the bank (preferably where water is visibly flowing) and 6" below the surface
- Avoid sampling debris or scum layer from the surface.
- Photograph evidence of dead fish!



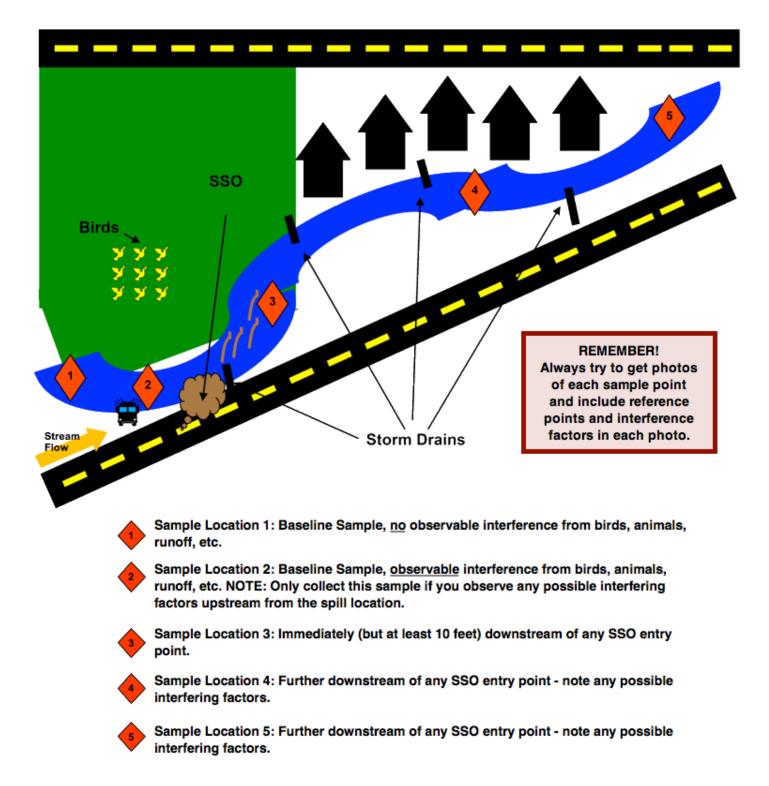
return to the normal level or cessation of monitoring is authorized by the County Environmental Health Department.

Field Sampling Kit Procedures for Sampling Receiving Waters after a Sewage Spill

This example is provided for illustrative purposes <u>only!</u> Base each sampling event on the geography, drainage and interference factors (*i.e. birds, animals, runoff, etc.*) of the area impacted. Consult Manager of Operations and Maintenance or IEUA Lab as needed.

D-1

Side B



Field Sampling Kit Sample Collection Chain of Custody Record

Customer Name					Hazardous Waste	PO#	
Customer Address					Unknown Material	WO#	
Customer Telephone	Mail Code		LAB INFORMATION		Turnar	Turnaround Requirement	
Program Name				Ship	to:	□ Norm	nal (21 days)
Lab Program Coordinator	Phone #		Ship Date:		□ Rush		
Sampled By				Cour	er:	□ Othe	r:

D-2

	SAMPLE COLLECTION INFORMATION									Analysis Request				ed	d QA/QC Requirements		
			т												X	Lab Standard	
			Туре					#								Special (see attached)	
LIMS# (Issued by Lab)	Date	Time	Composite	Grab	Sample Location	Field pH	Field Temp	[#] Containers	Matrix*	Ammonia	Enterococcus					Remarks/Notes	
				X	Upstream			2	А	\mathbf{X}	X						
				X	Entry Point			2	Α	\mathbf{X}	\mathbf{X}						
				X	Downstream			2	Α	X	X						
								2									
								2									
								2									
								2									
*Matrix: P = Potable Water, W = Wastewater, A = Ambient Water, G = Groundwater, S = Soil, B = Biosolids, I = Industrial, O = Other (specify in remarks)																	

Relinquished	Date	Time	Relinquished to	Date	Time		Transport/Shipping Information			
] [USPS		□ FedEx	
							Tracing #:			
						[□ Other:			

Sample Receiving Documentation Container intact? Yes Correct container? □ Yes □ No Field preserved? Custody tape intact? 🗆 No 🗆 No 🗆 No □ No Temp. Blank? □ Yes □ No (°C) Cooled? □ Yes Comments: Sample distribution: Lab bench lce chest Walk-in cooler shelf # Disposal Date: Disposed by: (inits.) C-O-C Distribution By: □ Prog/proj Mgr. □ Lab Prog. Coord. □ Delivery courier □ Pick-up courier Date: □ Lab Admin File

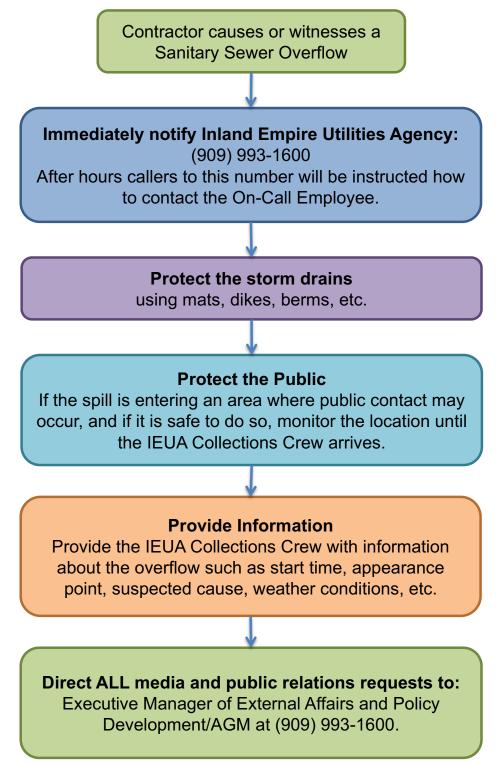
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Appendix E

CONTRACTOR ORIENTATION

CONTRACTOR ORIENTATION

The following procedures are to be followed in the event that you cause or witness a Sanitary Sewer Overflow.



What to do if you cause or witness a Sanitary Sewer Overflow

- What? A sanitary sewer overflow (SSO) is a discharge of untreated human and industrial waste from the sanitary sewer system before it reaches the wastewater treatment facility.
- Where? SSOs usually occur through manholes, plumbing fixtures and service cleanouts.
- Why? SSOs are usually caused by grease, debris, root balls, or personal hygiene products blocking the sewer lines, or by unusually high flow volume.

How to prevent SSOs:

...when clearing plugged sewer laterals:

- Remove root balls, grease blockages and any other debris from the sewer
- If you can't prevent root balls, grease or debris from entering the sewer main, call us at (909) 993-1600, so we can work with you to remove the blockage and prevent blockages further downstream
- Use plenty of water to flush lines.

...when constructing or repairing sewer laterals:

- Contact the Department Manager of Engineering at (909) 993-1600 for a permit and lateral specifications.
- Check your work area. Make sure there is no debris left in the sewer line before you backfill.
- Avoid offset joints, which may make sewer lines vulnerable to root intrusion and grease or debris accumulation. Properly bed your joints and don't hammer tap.

If you cause or witness an SSO, immediately contact:

Inland Empire Utilities Agency (909) 993-1600

After Hours: follow instructions to contact the On-Call Employee



6075 Kimball Avenue Chino, CA 91708 Appendix F

CUSTOMER COMPLAINT RECORD

Customer Complaint Record

NOTIFICATION

Date:	
Time: AM DPM	
Method: Telephone Email Other:	
COMPLAINANT (check here if reported anonymously]) Name: Address: Telephone:	

REPORTED COMPLAINT

When did the complainant first notice the SSO? Date:	Time:	AM PM
Did the SSO reach Waters of the State? Yes No Unknown		
Description of the complaint:		

RESOLUTION OF THE COMPLAINT:

FEASIBLE AND REMEDIAL ACTIONS TAKEN: