



SPILL EMERGENCY RESPONSE PLAN (SERP)

UPDATE (MAY 2023)

Spill Emergency Response Plan Update Part 1 – Compliance Guide

SERP Review and Approved By	Name/Title	Signature/Date
Legally Responsible Official (1)		
Legally Responsible Official (2)		
Legally Responsible Official (3)		

ACTIVITY CHANGE LOG (SERP)		
Date	Responsible Person/Title	Description Activity/Change

Spill Emergency Response Plan Update
Part 1 – Compliance Guide

PART 1 (COMPLIANCE GUIDE)

COMPLIANCE POINT #18
COMPLIANCE POINT #2-1.....9
COMPLIANCE POINT #2-2.....10
COMPLIANCE POINT #2-3.....11
COMPLIANCE POINT #312
COMPLIANCE POINT #413
COMPLIANCE POINT #5-1.....14
COMPLIANCE POINT #5-2.....14
COMPLIANCE POINTS #6-115
COMPLIANCE POINT #6-2.....15
COMPLIANCE POINT #6-3.....16
COMPLIANCE POINT #6-4.....16
COMPLIANCE POINT #6-5.....17

PART 2 (FIELD GUIDE)

LIST OF TABLES

Table 1 - Summary of Applicable Spill Emergency Response Plan Requirements 6
Table 2 - Spill Prevention, Containment, Control, Mitigation and Response Metrics Reviewed.....**Error!**
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LIST OF ATTACHMENTS

- Attachment 1 – WDR Implementation guidance (SWRCB)**
- Attachment 2 – SERP Key Performance Indicators (KPIs)**
- Attachment 3 – Spill Category Determination Worksheet**
- Attachment 4 – Spill Time Estimation Worksheet**
- Attachment 5 – Spill Duration and Flow Worksheet**
- Attachment 6 – Spill Measured Volume Estimation Worksheet**
- Attachment 7 – Spill Upstream Connections Volume Estimation Worksheet**
- Attachment 8 – Spill Response Evaluation Worksheet**
- Attachment 9 – Training Record Worksheet**
- Attachment 10 – Cleaning Services Declination Waiver**
- Attachment 11 – Equipment Inventory and Critical Spare Parts List**
- Attachment 12 – Spill Data and Trends Worksheet**
- Attachment 13 – SPILL RESPONSE FIELD FORM**

Spill Emergency Response Plan Update

Part 1 – Compliance Guide

Introduction

This document, the Spill Emergency Response Plan (SERP), formerly known as the Overflow Emergency Response Plan (OERP) has been prepared by Fischer Compliance LLC with assistance from the Inland Empire Utilities Agency (IEUA) staff for complying with one of a series of updated regulatory requirements resulting from the State Water Resources Control Board 2022 adoption of the “reissued” Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems¹ (referred to as “the 2022 WDR” throughout this document.”

One primary area of focus by the State Water Board through updated regulatory requirements in the 2022 WDR is *objective compliance* with effective implementation of elements of the IEUA’s Sewer System Management Plan (SSMP). The State Water Board emphasizes urgency on the structure, content, and organization of an agency-specific SERP for ensuring effective spill, containment, control, and mitigation².

The effectiveness of the SERP is measured by the following objectives, providing IEUA-specific translation of the corresponding State Water Board expectations for required effective spill responses:

- Implement effective and proactive spill containment, control, and mitigation
- Comply with State Water Board guidance on SERP implementation (see Attachment 1.1)
- Reduce future IEUA WDR violations, potential water quality impacts, and nuisances
- Meet/exceed all WDR compliance points in a systematic, streamlined, and transparent manner to facilitate use by Legally Responsible Official(s), Managers, and field staff
- Measure and improve IEUA SERP effectiveness (see Attachment 2)
- Expedite review by Water Board compliance inspectors and prepare IEUA for future regulatory audits of the SERP

These objectives provide the cornerstone for PART 1 (COMPLIANCE GUIDE) of this document, formulated by Fischer Compliance LLC around a streamlined process for objectively reviewing each applicable SERP compliance point, presenting the method(s) for how IEUA is complying with each requirement, and providing customized Key Performance Indicators (KPIs) for IEUA SERP for measuring effectiveness. PART 2 of this document includes streamlined information and procedures for IEUA first responders and field operations staff.

Table 1 below provides a summary of applicable Spill Emergency Response Plan requirements for full compliance with the WDR.

¹ See [Order No. 2022-0103-DWQ](#)

² See [Order No. 2022-0103-DWQ](#), Attachment D (page D-2) which states “the State Water Board or a Regional Water Board may consider the Enrollee’s efforts in implementing an effective Sewer System Management Plan to prevent, contain, control, and mitigate spills when considering Water Code section 13327 factors to determine necessary enforcement of this General Order.”

Spill Emergency Response Plan Update

Part 1 – Compliance Guide

Table 1 - Summary of Applicable Spill Emergency Response Plan Requirements

Compliance Point	WDR Section	Page	Regulatory Requirements
1	Spec. 5.7	22	<ul style="list-style-type: none"> Allocate necessary resources for spill responses
2-1	5.12	23	<ul style="list-style-type: none"> Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023); certify SERP up to date in Annual Report)
2-2	5.12	24	<ul style="list-style-type: none"> Targets and measures for protection of public health and environment
2-3	5.12	24	<ul style="list-style-type: none"> Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
3	5.13	24	<ul style="list-style-type: none"> Comply with Notification, Monitoring, Reporting, Recordkeeping requirements
4	ATT D-3	D-4	<ul style="list-style-type: none"> Collaborate with storm drain agencies and ensure easement accessibility agreements for locations requiring operations
5-1	ATT D-4	D-5	<ul style="list-style-type: none"> SERP training and practice drills Inventory of sewer system equipment/identification of critical replacement and spare parts
5-2	ATT D-4	D-4.4	
6-1	ATT D-6	D-6	<ul style="list-style-type: none"> Ensure Training/Implementation of SERP for staff and contractors Address Emergency Operations/Traffic Control Implement technologies, practices, equipment, coordination Conduct Post-spill assessments Annually review/assess effectiveness of SERP/update
6-2	ATT D-6	D-6	
6-3	ATT D-6	D-6	
6-4	ATT D-6	D-6	
6-5	ATT D-6	D-6	
see 2-1 above	ATT D-6	D-6	<ul style="list-style-type: none"> Spill Emergency Response Plan/prompt detection/response
see 3 above	ATT D-6	D-6	<ul style="list-style-type: none"> Notifications (primary responders, agencies)
see 3 above	ATT D-6	D-6	<ul style="list-style-type: none"> Notifications (other potentially affected agencies)
see 3 above	ATT D-6	D-6	<ul style="list-style-type: none"> Comply with WDR Att. E1 requirements
see 2-3 above	ATT D-6	D-6	<ul style="list-style-type: none"> Containment, minimize/prevent spills to waters of state and drainage conveyances
see 2-2 above	ATT D-6	D-6	<ul style="list-style-type: none"> Minimize public health and environmental impacts
see 2-2 above	ATT D-6	D-6	<ul style="list-style-type: none"> Remove sewage from drain conveyance
see 2-2 above	ATT D-6	D-6	<ul style="list-style-type: none"> Clean spill area/drain conveyance
see 4 above	ATT D-6	D-6	<ul style="list-style-type: none"> Implement pre-planned coordination and collaboration with storm drain agencies
see 3 above	ATT D-6	D-6	<ul style="list-style-type: none"> Document and report spill events

Spill Emergency Response Plan Update

Part 1 – Compliance Guide

Compliance Evaluation

For preparing the SERP, an onsite compliance evaluation inspection was completed of the IEUA’s existing spill prevention, containment, control, and mitigation effectiveness³. This included review of IWRD’s existing Overflow Emergency Response Plan (OERP), spill prevention/reduction strategies, field practices, data collection approach, critical spare parts/inventory, and field staff training. In addition, the inspection included review of data in the State Water Board’s “California Integrated Water Quality System” (CIWQS⁴) including agency spill response metrics and benchmarks (see Table 2 below for details).

Table 2 – IEUA spill data and compliance benchmarks

Element	Benchmarks
<ul style="list-style-type: none">Spill Response Metrics (agency notification - operator arrival)	<u>0.88 hours</u> (averaged, 2018-2023) <u>4.0 hours max</u> (2018-2023)
<ul style="list-style-type: none">Notification Compliance (Category 1 spill notification to Cal-OES >2 hours)	<u>1 violation</u> (2018-2023)
<ul style="list-style-type: none">Draft Reporting Compliance (Category 1 spills within 3 business days)	<u>0 violations</u> (2018-2023)
<ul style="list-style-type: none">Spill Recovery (%) (2018-2023)	Cat 1=7% Cat 2= 39% Cat 3=36%

SERP Effectiveness

For facilitating review, assessment, and measurement of SERP effectiveness, Key Performance Indicators (KPIs) were generated for facilitating annual review, assessment, and update of the SERP for improving its effectiveness (see Attachment 2).

³ See Order No. 2022-0101-DWQ, Provision 6.1.6 (Water Boards’ considerations for discretionary enforcement purposes)

⁴ CIWQS, publicly available at:

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

COMPLIANCE POINT #1

1-1 Regulatory Requirement

WDR Section	Summary of Requirements
Specif. 5.7 (p22)	<ul style="list-style-type: none">• Allocate necessary resources for spill responses

1-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details on resources and implementation, see [IEUA SSMP](#), Elements II (Organization), IV (O/M), and VI (Emergency Response Plan).

1-3 Effectiveness

- For further improving SSMP implementation and effectiveness, the IEUA has established 65% if its field staff holding CWEA collection system maintenance certifications⁵.
- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes [Attachment 2, Compliance Point #1](#).

⁵ California Water environmental Association (CWEA), <https://www.cwea.org/certification/>

COMPLIANCE POINT #2-1

2-1-1 Regulatory Requirements

WDR Sections	Summary of Requirements
<ul style="list-style-type: none">• Specif. 5.12 (pgs23-24)	<ul style="list-style-type: none">• Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023)• Certify the SERP up to date in the Annual Report
<ul style="list-style-type: none">• ATT D-6 (pgD-6)	<ul style="list-style-type: none">• Prompt detection and response to spills to reduce spill volumes and collection information for prevention of future spills.• Containment, minimize/prevent spills to waters of state and drainage conveyances

2-1-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- To enhance SERP effectiveness and early detection of potential spills, the IEUA has developed and is implementing [Mutual Aid Agreements](#) with its neighboring collection systems agencies within its regional service area. For additional proactive measures, IEUA purchased and has deployed individual electronic manhole level sensor monitors for proactive monitoring and alarms for high flows throughout the collection system.
- For additional details demonstrating compliance, refer to the [IEUA Spill Response Field Guide](#).

2-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes [Attachment 2, Compliance Point #2-1](#).

COMPLIANCE POINT #2-2

2-2-1 Regulatory Requirements

WDR Section	Summary of Requirements
<ul style="list-style-type: none">• Specif. 5.12 (p24)• ATT D-6 (pgD-6)	<ul style="list-style-type: none">• Targets for protection of public health and the environment• Minimize public health and environmental impacts• Remove sewage from drain conveyance• Clean spill area/drain conveyance

2-2-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

2-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #2-2.

COMPLIANCE POINT #2-3

2-3-1 Regulatory Requirements

WDR Section	Summary of Requirements
<ul style="list-style-type: none">• Specif. 5.12 (p23-24)	<ul style="list-style-type: none">• Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
<ul style="list-style-type: none">• ATT D-6 (pgD-6)	<ul style="list-style-type: none">• Containment, minimize/prevent spills to waters of state and drainage conveyances

2-3-2 Compliance

- The IUEA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the [IEUA Spill Response Field Guide](#).

2-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, see [Attachment 2, Compliance Point #2-3](#).

COMPLIANCE POINT #3

3-1 Regulatory Requirements

WDR Section	Summary of Requirements
<ul style="list-style-type: none"> • Spec. 5.13 (p24) • ATT D-6 (pD-6) 	<ul style="list-style-type: none"> • Comply with Notification, Monitoring, Reporting, Recordkeeping requirements • Notifications (primary responders, agencies) • Notifications (other potentially affected agencies) • Comply with WDR Att. E1 requirements and document and report spill events

3-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- IEUA) contact information, 951-675-1131, is on their website <https://www.ieua.org/everything-water/ssmp/>. In addition, IEUA uses several social media sites to disseminate agency news and showcase its programs.
- IEUA receives calls for service in multiple ways, but mainly through public observation and notification. Administrative staff will answer calls for assistance during business hours, and a series of questions are asked of the caller to determine the potential problem. The Administrative staff forwards the call information and a service request to the Manager of Operations and Maintenance, who will dispatch staff for immediate response.
- After-hours emergency calls will use the same contact information for business hours, except the call is automatically forwarded to the On-Call Worker's cellular phone. The on-call worker will gather information for the call, then respond and asses the caller's concerns.
- IEUA monitors their wastewater lift stations through a supervisory control and data acquisition (SCADA) system. The SCADA system monitors the lift stations 24 hours a day, seven days a week. In addition, the SCADA system is programmed to send an alarm to notify IEUA staff when the station is not operating as intended or a high-level alarm is received.
- IEUA conducts extensive research for its spills for ensuring accurate volume estimations prior to the Legally Responsible Official (LRO) certifying spill reports in CIWQS. This includes an internal GIS report system completed for each spill event/debriefing (see agency files for examples and details).
- For additional details demonstrating compliance, refer to the [IEUA Spill Response Field Guide](#).

Spill Emergency Response Plan Update

Part 1 – Compliance Guide

3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #3.

COMPLIANCE POINT #4

4-1 Regulatory Requirements

WDR Section	Summary of Requirements
<ul style="list-style-type: none">• ATT D-3 (pD-4)	<ul style="list-style-type: none">• Procedures: Collaborating with storm drain agencies
<ul style="list-style-type: none">• ATT D-6 (pD-6)	<ul style="list-style-type: none">• Implement pre-planned coordination and collaboration with storm drain agencies and other utilities/departments prior to, during and after a spill.

4-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- IEUA coordinates on an ongoing basis with stormwater agencies throughout its service area for pre-planned coordination/collaboration for spills.
- IEUA utilizes the following publicly-available resources for its assessment of spills and collaboration with outside agencies (wastewater, water, stormwater, etc): USGS mapping tool with watershed and topography information⁶, California Board Basin Plan Beneficial Use Viewer tool,⁷ and the State Water Board eWRIMS tool⁸.
- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #4.

⁶ See <https://apps.nationalmap.gov/viewer/>

⁷ See <https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=116f7daa9c4d4103afda1257be82eb16>

⁸ See https://waterrightsmaps.waterboards.ca.gov/viewer/index.html?viewer=eWRIMS.eWRIMS_gvh#

COMPLIANCE POINT #5-1

5-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.3	<ul style="list-style-type: none">• SERP training and practice drills

5-1-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP including review of internal response procedures, practice drills, skilled volume estimation, and CIWQS reporting.
- For ensuring compliance, IEUA is conducting SERP training covering the following subjects for field staff:
 - Water Quality Monitoring
 - Pump Station Emergency Response Training and Drills
 - Spill Overflow Emergency Response/Spill Estimation
 - Bypass pumping
- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

5-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #5-1.

COMPLIANCE POINT #5-2

5-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.4	<ul style="list-style-type: none">• Inventory of sewer system equipment/identification of critical replacement and spare parts

5-2-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance with an inventory of system equipment, including identification of critical replacement and spare parts.

Spill Emergency Response Plan Update

Part 1 – Compliance Guide

- For additional details demonstrating compliance, refer to the [IEUA Spill Response Field Guide](#).

5-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes [Attachment 2, Compliance Point #5-2](#).

COMPLIANCE POINTS #6-1

6-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	<ul style="list-style-type: none">• Ensure training/implementation of SERP for staff and contractors

6-1-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the [IEUA Spill Response Field Guide](#).

6-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes [Attachment 2, Compliance Point #6-1](#).

COMPLIANCE POINT #6-2

6-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	<ul style="list-style-type: none">• Address Emergency Operations/Traffic Control

6-2-2 Compliance/Effectiveness

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional procedures, refer to the [IEUA Spill Response Field Guide](#).

Spill Emergency Response Plan Update

Part 1 – Compliance Guide

6-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-2.

COMPLIANCE POINT #6-3

6-3-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	<ul style="list-style-type: none">• Address Emergency Operations/Traffic Control

6-3-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

6-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-3.

COMPLIANCE POINT #6-4

6-4-1 Regulatory Requirement

WDR Page #(s)	Section	Summary of Requirements
Page D-5	ATT D-6	<ul style="list-style-type: none">• Conduct Post-spill assessments

6-4-2 Compliance

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional procedures, refer to the IEUA Spill Response Field Guide.

Spill Emergency Response Plan Update

Part 1 – Compliance Guide

6-4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-4.

COMPLIANCE POINT #6-5

6-5-1 Regulatory Requirement

WDR Page #(s)	Section	
Page D-5	ATT D-6	<ul style="list-style-type: none">• Annually review/assess effectiveness of SERP/update

6-5-2 Compliance/Effectiveness

- The IEUA Executive Manager of Operations/AGM is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.
- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

6-5-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-5.

LIST OF ATTACHMENTS

(These attachments are designed for assisting agencies in complying with the Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems (Order No. 2022-0103-DWQ))

Attachment 1 – WDR Implementation guidance (SWRCB)

Attachment 2 – SERP Key Performance Indicators (KPIs)

Attachment 3 – Spill Category Determination Worksheet

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