

ALTO SANITARY DISTRICT
P.O. BOX 163, MILL VALLEY, CA 94942; PHONE: (415) 388-3696
SPECIAL meeting of the Board of Directors held at the
Sewerage Agency of Southern Marin, 450 Sycamore Avenue, Mill Valley, CA
6:30 P.M. WEDNESDAY, July 22, 2026
(Please note meeting time change)

AGENDA

(Note: Meeting will be opened concurrently with the Regular meeting)

- 1. Call to Order**
- 2. Roll Call-** President Janis M. Bosenko
Directors: Secretary/Treasurer Marc Nash, Michael Faust, Todd Gates, Porter Merriman
- 3. Approve Agenda**
- 4. Regular Business**
 - a.** Adopt Resolution No. 2026-07 adopting the 2026 Alto Sanitary District Sewer System Management Plan (SSMP) including authorizing the District Manager to make administrative and ministerial revisions to the SSMP and approving payment to Tamalpais Community Services District for up to 20 hours of work to prepare and finalize the SSMP
- 5. Adjourn meeting**

ALTO SANITARY DISTRICT

Staff Report

Special Board Meeting

July 22, 2026

TO: BOARD OF DIRECTORS

FROM: GARRETT TOY, DISTRICT MANAGER

SUBJECT: ADOPT RESOLUTION NO. 2026-07 ADOPTING THE 2026 ALTO SANITARY DISTRICT SEWER SYSTEM MANAGEMENT PLAN (SSMP) INCLUDING AUTHORIZING THE DISTRICT MANAGER TO MAKE ADMINISTRATIVE AND MINISTERIAL REVISIONS TO THE SSMP AND APPROVING PAYMENT TO TAMALPAIS COMMUNITY SERVICES DISTRICT FOR UP TO 20 HOURS OF WORK TO PREPARE AND FINALIZE THE SSMP

RECOMMENDATION

Adopt Resolution No. 2026-07 adopting the Alto Sanitary District Sewer System Management Plan (2026 Update) including authorizing the District Manager to make administrative and ministerial revisions to the SSMP and approving payment to Tamalpais Community Services District for up to 20 hours of work to prepare and finalize the SSMP pursuant to the Shared Services Agreement.

DISCUSSION

The District's Sewer System Management Plan (SSMP) was last comprehensively updated in 2019. The SSMP was administratively updated in 2023 to incorporate the District's Overflow Emergency Response Plan. Under the current SWRCB General Waste Discharge Requirements for Sanitary Sewer Systems, the District is required to update and certify its SSMP at least once every six years. The current update is due by August 2026.

The proposed 2026 SSMP has been revised to reflect current District operations, including implementation of the Shared Services Agreement with Tamalpais Community Services District (TCSD), incorporation of the District's 2023 Overflow Emergency Response Plan, updated maintenance and asset management practices, and current capital improvement planning. Staff has determined that the updated SSMP satisfies the current State Water Resources Control Board requirements for Sewer System Management Plans while improving the document's organization, usability, and long-term administration.

The revised SSMP incorporates several supporting documents by reference rather than attaching them in full. This approach allows routine administrative documents, such as contact information, GIS maps, the Capital Improvement Program, and operational forms, to be updated by staff without requiring future SSMP amendments.

The resolution adopts the 2026 updated SSMP, authorizes the District Manager to make non-substantive administrative and ministerial revisions to the SSMP prior to submittal, and allows

for administrative updates to SSMP documents without requiring prior Board approval provided such updates do not modify Board-adopted policy or applicable regulatory requirements, and approves payment to TCSD for up to 20 hours of work used to prepare and finalize the SSMP pursuant to the terms of the Shared Services Agreement.

FISCAL IMPACT

Approval of payment to Tamalpais Community Services District for up to 20 hours of work to prepare and finalize the SSMP. The update to the SSMP was outside the base scope of work envisioned under the Shared Service Agreement. Funds are available within the adopted operating budget.

ATTACHMENTS

- A. Resolution
- B. SSMP

ALTO SANITARY DISTRICT

RESOLUTION NO. 2026-07

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE ALTO SANITARY DISTRICT ADOPTING THE 2026 SEWER SYSTEM MANAGEMENT PLAN

WHEREAS, the State Water Resources Control Board (SWRCB) requires wastewater collection system agencies to prepare, implement, and periodically update a Sewer System Management Plan (SSMP) in accordance with the General Waste Discharge Requirements for Sanitary Sewer Systems; and

WHEREAS, the Alto Sanitary District last comprehensively updated its SSMP in 2019 and has prepared a 2026 update to reflect current District operations, organizational structure, maintenance practices, asset management, capital planning, and the 2023 Overflow Emergency Response Plan; and

WHEREAS, the Board of Directors has reviewed the proposed 2026 SSMP and finds that it satisfies applicable regulatory requirements and provides an appropriate framework for the management, operation, maintenance, and improvement of the District's wastewater collection system; and

WHEREAS, the 2026 SSMP incorporates certain supporting documents by reference to facilitate routine administrative updates while preserving Board oversight of substantive policy and regulatory matters; and

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Alto Sanitary District hereby:

1. Adopts the 2026 Sewer System Management Plan (SSMP).
2. Authorizes the District Manager to make non-substantive administrative and other ministerial revisions to the SSMP and to submit the SSMP to the SWRCB.
3. Determines that administrative updates to documents incorporated by reference, including contact information, GIS maps, the Capital Improvement Program, operational forms, and similar supporting documents, shall not require Board approval provided such updates do not modify Board-adopted policy or applicable regulatory requirements.
4. Directs the District Manager to maintain the adopted SSMP and make it available as required by law.
5. Approves payment to TCSD for up to 20 hours of work used to prepare and finalize the SSMP pursuant to the terms of the Shared Services Agreement.

PASSED, APPROVED AND ADOPTED by the Board of Directors of the Alto Sanitary District at a special meeting held on July 22, 2026.

Janis Bosenko, President

ATTEST:

Marc Nash, Secretary

ALTO SANITARY DISTRICT

Sewer System Management Plan

2026 Update

Prepared in accordance with the
State Water Resources Control Board
General Waste Discharge Requirements
for Sanitary Sewer Systems

July 2026

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Document Control

Document	Sewer System Management Plan
District	Alto Sanitary District
Current Update	2026
Original SSMP	2010
Previous Update	2019
Prepared By	Alto Sanitary District
Management Services	Tamalpais Community Services District
District Engineer	Nute Engineering, San Rafael
Legal Counsel	Marin County Counsel
Adoption	Resolution No. 2026-__

Document Revision Log

Revision	Date	Description
Original	2010	Initial SSMP
Update	2019	Comprehensive update
Update	2026	Updated to reflect current operations, Shared Services Agreement, and 2023 OERP

Executive Summary

Alto Sanitary District owns and maintains the public wastewater collection system serving approximately 1,200 residents. This Sewer System Management Plan (SSMP) has been prepared in accordance with the State Water Resources Control Board General Waste Discharge Requirements for Sanitary Sewer Systems. The SSMP documents the District's management, operation, maintenance, emergency response, and capital improvement practices to protect public health and the environment while minimizing sanitary sewer overflows. The SSMP serves as the District's regulatory compliance document as well as its primary operational guidance document.

The 2026 update reflects the District's current operations, including management and administrative services provided through a Shared Services Agreement with Tamalpais Community Services District, updated operations and maintenance practices, and incorporation of the 2023 Overflow Emergency Response Plan by reference. The District remains committed to proactive maintenance, regulatory compliance, and long-term capital planning. Furthermore, the District is committed to continuous improvements based on information obtained from its maintenance activities and annual system evaluations.

How to Use this Document

This SSMP serves as both a regulatory compliance document and an operational reference. Administrative information may be updated as needed, while substantive policy changes should be approved by the Board of Directors.

System Facts

Population Served	Approximately 1,200
Gravity Sewer	3.1 miles
Pump Stations	None
Treatment Agency	Sewage Agency of Southern Marin
Management Services	Tamalpais Community Services District
District Engineer	Nute Engineering
Legal Counsel	Marin County Counsel
Preventive Cleaning	Entire system annually
High Maintenance Areas	Semi-annually
SSMP Audit	Every two years

Definitions

Capital Improvement Program (CIP): A multi-year program that identifies, prioritizes, and budgets major rehabilitation and replacement projects for District-owned wastewater infrastructure.

CCTV Inspection: Closed-circuit television inspection used to evaluate the condition of sewer mains and identify structural defects, roots, debris, inflow and infiltration, or other maintenance concerns.

District Manager: The individual responsible for the overall administration and management of District operations. The District Manager coordinates implementation of the SSMP through the Shared Services Agreement with Tamalpais Community Services District.

Fats, Oils and Grease (FOG): Substances that can accumulate within sewer pipelines and contribute to blockages and sanitary sewer overflows.

GIS: Geographic Information System used to maintain mapping and asset information for the wastewater collection system.

Inflow and Infiltration (I&I): Groundwater and stormwater entering the wastewater collection system through defects, improper connections, or deteriorated infrastructure.

Sanitary Sewer Overflow (SSO): Any overflow, spill, release, discharge, or diversion of untreated or partially treated wastewater from the sanitary sewer collection system.

Sewer Lateral: The privately owned sewer pipe connecting a building to the public sewer main.

Sewer Lateral Ordinance: District Ordinance No. 2015-01 requiring inspection and repair or replacement of private sewer laterals under specified circumstances to reduce inflow and infiltration and protect the public sewer system.

Acronyms

- ASD – Alto Sanitary District
- CIP – Capital Improvement Program
- CCTV – Closed-Circuit Television
- FOG – Fats, Oils and Grease
- GIS – Geographic Information System
- I&I – Inflow and Infiltration
- OERP- Overflow Emergency Response Plan
- RWQCB- Regional Water Quality Control Board

- SASM – Sewage Agency of Southern Marin
- SSO – Sanitary Sewer Overflow
- SWRCB – State Water Resources Control Board
- TCSD – Tamalpais Community Services District
- WDR – Waste Discharge Requirements

References

- State Water Resources Control Board General Waste Discharge Requirements for Sanitary Sewer Systems (current version).
- Alto Sanitary District Sewer Lateral Ordinance No. 2015-01.
- Sewage Agency of Southern Marin (SASM) Standard Specifications.
- Applicable Alto Sanitary District ordinances, policies, and engineering standards.
- 2023 Overflow Emergency Response Plan

District Overview

The Alto Sanitary District (District) is an independent special district providing wastewater collection service to the unincorporated Alto neighborhood of southern Marin County. The District serves approximately 1,200 residents through a publicly owned wastewater collection system.

The District owns and maintains approximately 3.1 miles of gravity sewer mains and does not own or operate any wastewater pump stations. Wastewater collected by the District flows by gravity to treatment facilities owned by the Sewerage Agency of Southern Marin (SASM), a Joint Powers Authority consisting of six member agencies.

The District's collection system was originally constructed during the late 1940s and early 1950s and consists primarily of vitrified clay pipe. Like many collection systems of similar age, portions of the system are susceptible to root intrusion, groundwater infiltration, and deterioration associated with aging infrastructure. Over the past decade, the District has made significant investments in its Capital Improvement Program (CIP), replacing or rehabilitating many of the highest-priority sewer segments. As a result, the District has transitioned from addressing the most critical deficiencies to implementing an ongoing asset management program focused on preventive maintenance, condition assessment, and planned rehabilitation.

Under a Shared Services Agreement approved in 2026, the Tamalpais Community Services District (TCSD) provides District Manager and administrative services to Alto Sanitary District. Day-to-day operations are supported through a combination of District management, contracted maintenance services, engineering consulting, and legal counsel. Maintenance of the wastewater collection system, including emergency response, routine cleaning, and inspection, is performed by qualified contractors under the direction of the District Manager. Engineering services support capital planning, system evaluation, design, construction management, and regulatory compliance.

The District is committed to protecting public health and the environment through proactive maintenance, effective asset management, regulatory compliance, and long-term financial planning. The District annually reviews its operating budget, capital improvement needs, and maintenance priorities to ensure continued reliability of the wastewater collection system while minimizing the risk of sanitary sewer overflows.

Element I – SSMP Goals

Requirements

D.13(i) Goals: The SSMP shall establish the goals of the Sewer System Management Plan to properly manage, operate, and maintain the sanitary sewer system in order to reduce and prevent sanitary sewer overflows (SSOs), as well as mitigate any SSOs that do occur.

Response

The District has established the following goals:

1. Protect public health and the environment by minimizing the occurrence of sanitary sewer spills.
2. Operate and maintain the wastewater collection system in a safe, reliable, and cost-effective manner.
3. Maintain compliance with all applicable State Water Resources Control Board orders, reporting requirements, permits, and regulations.
4. Implement a preventive maintenance program that emphasizes routine inspection, and condition assessment of sewer mains and manholes.
5. Identify and prioritize rehabilitation and replacement projects through ongoing system evaluation and capital improvement planning.
6. Respond promptly and effectively to sewer emergencies and minimize impacts to the public and the environment.
7. Maintain adequate financial resources to support operation, maintenance, rehabilitation, replacement, and emergency response activities.
8. Reduce inflow and infiltration through maintenance activities, sewer lateral requirements, and timely rehabilitation of aging infrastructure.
9. Provide appropriate training, resources, equipment, and support for personnel and contractors responsible for operating and maintaining the wastewater collection system.
10. Periodically review and update this SSMP to ensure it reflects current regulatory requirements, organizational structure, and District operating practices.

Element II – Organization

Requirements

D.13(ii) Organization: The SSMP shall identify:

- (a) The name of the responsible or authorized representative.
- (b) The names and telephone numbers for management, administrative, and maintenance personnel responsible for implementing the SSMP, including an organization chart showing lines of authority.
- (c) The chain of communication for reporting sanitary sewer overflows (SSOs), including the person responsible for regulatory reporting and notifications.

Response

Ila) Organization

BOARD OF DIRECTORS

The Alto Sanitary District is governed by a five-member elected Board of Directors. The Board establishes District policies, adopts the annual budget, approves capital improvement projects, and provides overall policy direction for the operation and maintenance of the wastewater collection system.

DISTRICT MANAGER

The District Manager is responsible for the day-to-day administration of the District, implementation of the SSMP, regulatory compliance, coordination of maintenance and engineering services, emergency response oversight, budget administration, and reporting to the Board of Directors.

Currently, the Tamalpais Community Services District (TCSD) provides District Manager and administrative services to Alto Sanitary District pursuant to the Shared Services Agreement approved in 2026.

DISTRICT ENGINEER

The District Engineer provides engineering services including capital improvement planning, system evaluation, development review, administrative and technical support, design, construction management, condition assessment, regulatory support, and technical assistance to the District Manager and Board. The District contracts with an outside engineering firm to provide these services. Currently, Nute Engineering serves as the District Engineer.

MAINTENANCE CONTRACTOR

The District contracts with qualified maintenance personnel to provide routine system cleaning, CCTV inspections, preventive maintenance, emergency response, and repairs to the wastewater collection system under the direction of the District Manager.

LEGAL COUNSEL

Legal counsel provides legal advice to the Board of Directors and District Manager regarding District operations, regulatory compliance, contracts, and other legal matters. Current, legal services are provided by the Marin County Counsel's office.

Ilb) Organization Chart

See Appendix B

IIc) Chain of Communication

Reports of sanitary sewer spills received by the District's maintenance contractor and/or District Manager. The maintenance contractor responds immediately to assess, contain, and mitigate the overflow and promptly notifies the District Manager. The District working in coordination with the contractor and District Engineer coordinates resources, public notifications, and other support services as needed to respond to spills. The District Manager is responsible for ensuring all required notifications and regulatory reporting are completed in accordance with the District's Spill Emergency Response Plan and applicable State Water Resources Control Board requirements.

Element III – Legal Authority

Requirements

D.13(iii) Legal Authority: The SSMP shall demonstrate that the District has the legal authority to:

- (a) Prevent illicit discharges, infiltration and inflow (I&I), stormwater, debris, and other prohibited materials from entering the wastewater collection system.
- (b) Require sewers, service connections, and appurtenances to be properly designed, constructed, installed, tested, and inspected.
- (c) Ensure access for maintenance, inspection, monitoring, or repair of those portions of the sewer system owned or maintained by the District.
- (d) Limit the discharge of fats, oils, grease (FOG), and other materials that may contribute to blockages or sanitary sewer overflows.
- (e) Enforce violations of the District's sewer ordinances, standards, permits, and other applicable requirements.

Response

IIIa) Alto Sanitary District is an independent special district organized under the laws of the State of California and governed by a publicly elected Board of Directors. The District has the authority to own, operate, maintain, and regulate its wastewater collection system in accordance with applicable State law.

IIIb) The District has adopted sewer ordinances, design standards, and permit requirements governing the use, construction, inspection, operation, and maintenance of its wastewater collection system, including requirements for sewer laterals and new connections.

IIIc) The District administers Sewer Lateral Ordinance No. 2015-01, which authorizes the inspection, repair, and replacement of private sewer laterals under specified conditions to reduce inflow and infiltration (I&I) and protect the public wastewater collection system.

IIId) The District's ordinances and standards prohibit the discharge of materials that may damage or obstruct the wastewater collection system, including fats, oils, grease, stormwater, debris, and other prohibited substances.

IIIe) The District has the authority to enforce its ordinances, standards, permit conditions, and other applicable requirements through inspections, permit review, notices of violation, and other enforcement actions authorized by law.

Element IV – Operations and Maintenance

Requirements

D.13(iv) Operation and Maintenance Program

The SSMP shall include an operation and maintenance program that provides for:

- (a) Maintenance of an up-to-date map of the wastewater collection system.
- (b) Routine preventive operation and maintenance activities, including scheduling and documentation.
- (c) A rehabilitation and replacement program that identifies and prioritizes system deficiencies and includes a Capital Improvement Program (CIP).
- (d) Appropriate training for staff and contractors responsible for operation and maintenance.
- (e) An inventory of equipment and replacement resources.

Response

IVa) Collection System Mapping

The District maintains mapping of its wastewater collection system using a Geographic Information System (GIS). The mapping includes sewer mains, manholes, pipe characteristics, and other system information used for operation, maintenance, emergency response, and capital improvement planning. Beginning in Fiscal Year 2026–27, the District is enhancing its GIS database by collecting more precise field locations and asset information for individual manholes where improved positional accuracy will support future maintenance, inspections, and capital planning. GIS mapping is updated as system improvements are completed, field inspected, and/or otherwise verified by the District Engineer.

IVb) Preventive Maintenance Program

The District utilizes qualified maintenance contractors to perform routine preventive maintenance of the wastewater collection system under the direction of the District Manager. Beginning in Fiscal Year 2026–27, the District implemented an annual cleaning program in which the entire wastewater collection system is cleaned each year. Sewer segments with a history of root intrusion, debris accumulation, or other maintenance concerns are cleaned more frequently, including on a six-month cycle where warranted. The preventive maintenance program also includes CCTV inspections, emergency response, root control where appropriate, and other maintenance activities based on system condition and operational needs. Maintenance activities are documented and used to evaluate system performance and prioritize future rehabilitation and capital improvements. Maintenance records are periodically reviewed to identify any recurring issues.

IVc) Rehabilitation and Replacement Program

The District implements an ongoing Capital Improvement Program (CIP) to rehabilitate and replace aging wastewater infrastructure. Rehabilitation priorities are established using CCTV inspections, maintenance records, field observations, age of infrastructure, manhole inspections, and engineering evaluations. Beginning in Fiscal Year 2026–27, the District initiated a comprehensive manhole inspection program to assess the condition of all District-owned manholes. The results of these inspections are used to prioritize rehabilitation and replacement projects. The

District's annual CIP includes funding for replacement of priority manholes as identified through the inspection program. The CIP is reviewed annually as part of the budget process and updated as necessary to address system deficiencies, maintain system reliability, and reduce the potential for sanitary sewer overflows.

IVd) Training

The District ensures that personnel and contractors responsible for operation, maintenance, emergency response, and regulatory reporting receive appropriate training to perform their assigned duties. Training is provided through contractor programs, professional organizations, regulatory agencies, and other appropriate resources.

IVe) Equipment and Replacement Resources

The District does not maintain its own wastewater maintenance equipment. Maintenance contractors provide or obtain the specialized vehicles, equipment, tools, and replacement materials necessary to perform routine maintenance, emergency response, and repairs. The District Manager coordinates with maintenance contractors and the District Engineer to ensure adequate resources are available to respond to system emergencies and maintain reliable operation of the collection system.

IV(f) Asset Management

The District utilizes an asset management approach to maintain the long-term reliability of its wastewater collection system and prioritize capital investments. Asset management integrates information from routine maintenance activities, CCTV inspections, manhole inspections, maintenance records, engineering evaluations, and operational observations to assess infrastructure condition and identify rehabilitation priorities. This information is used to support the District's Capital Improvement Program (CIP), optimize the useful life of wastewater assets, reduce life-cycle costs, and minimize the potential for sanitary sewer overflows. Asset management practices are reviewed periodically and updated as additional system information becomes available.

IV(g) Supporting Documents

The District maintains several supporting documents that supplement the Operations and Maintenance Program described in this SSMP. These documents are incorporated by reference and maintained as appendices to this SSMP or as separate District operational documents.

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Appendix A – Overflow Emergency Response Plan (OERP)

Appendix B – Organization Chart and Emergency Contact Information

Appendix C – Collection System Maps

Appendix D – Capital Improvement Program (CIP)

Appendix E – Sewer Lateral Ordinance No. 2015-01

Appendix F – SASM Standard Specifications

Appendix G – Operational Forms and Templates

These documents are reviewed and updated periodically, as appropriate, to reflect current District operations, regulatory requirements, and capital improvement planning.

Element V – Design and Performance Provisions

Requirements

D.13(v) Design and Performance Provisions

The SSMP shall identify design and construction standards and specifications for the installation, rehabilitation, and repair of the wastewater collection system and shall include:

- (a) Standards for installation, rehabilitation, and repair of collection system facilities.
- (b) Procedures and standards for inspecting and testing newly installed and rehabilitated facilities.
- (c) Procedures to ensure construction conforms to the District's standards and specifications.

Response

Va) Design Standards

The District utilizes the Sewerage Agency of Southern Marin (SASM) Standard Specifications, together with applicable District ordinances and regulatory requirements, for the design, construction, rehabilitation, and repair of wastewater collection system facilities. Plans and specifications for public sewer main improvements and other District-owned wastewater facilities are reviewed by the District Engineer prior to construction to ensure compliance with District standards. Improvements are constructed in accordance with approved plans and specifications. Any paving restoration or work within the public right-of-way shall also comply with applicable County of Marin standards and permit requirements.

Vb) Inspection and Testing

New and rehabilitated wastewater collection system facilities are inspected and tested, as appropriate, to verify compliance with approved plans, specifications, SASM Standard Specifications, and applicable industry standards before being accepted by the District. Inspection and testing may include visual inspection, air testing, leakage testing, CCTV inspection, or other methods appropriate for the type of improvement.

Vc) Construction Oversight

Construction inspection is performed by qualified inspection personnel retained by the District such as the District Engineer. Wastewater collection system improvements are accepted only after required inspections and testing have been satisfactorily completed and the District Engineer has determined the work to be in substantial conformance with the approved plans and specifications. Record drawings (as-builts) and other project documentation are maintained, as appropriate, following project completion.

Element VI – Overflow Emergency Response Plan (OERP)

Requirements

D.13(vi) Overflow Emergency Response Plan (OERP): The District shall maintain an Overflow Emergency Response Plan that identifies procedures for responding to, reporting, documenting, investigating, and mitigating sanitary sewer overflows (SSOs) in accordance with State Water Resources Control Board requirements.

Response

The Alto Sanitary District has adopted and maintains an Overflow Emergency Response Plan (OERP) that establishes procedures for responding to sanitary sewer overflows (SSOs) and complying with State Water Resources Control Board and Regional Water Quality Control Board reporting and notification requirements. The OERP is incorporated into this Sewer System Management Plan (SSMP) by reference and is included as Appendix A.

The OERP includes procedures for:

- Responding to and mitigating sanitary sewer overflows.
- Protecting public health and the environment.
- Overflow containment, cleanup, and service restoration.
- Notification and reporting to regulatory agencies.
- Documentation, investigation, and recordkeeping.
- Public notification, when required.
- Emergency response responsibilities and contact information.
- Training and periodic review of emergency response procedures.

The District reviews the OERP periodically and updates it as necessary to reflect changes in regulatory requirements, emergency response procedures, organizational responsibilities, and District operations.

References

Appendix A – Overflow Emergency Response Plan (OERP)

Appendix B – Organization Chart and Emergency Contact Information

Appendix C – Collection System Maps

Element VII – Fats, Oils, and Grease (FOG) Control Program

Requirements

D.13(vii) Fats, Oils, and Grease (FOG) Control Program

Each Enrollee shall evaluate its service area to determine whether a FOG Control Program is needed. If a formal FOG Control Program is not required, the SSMP shall provide the basis for that determination. If FOG is determined to be a problem, the SSMP shall include an appropriate source control program.

Response

VIIa) Evaluation of Service Area

The District has evaluated its service area and determined that a formal Fats, Oils, and Grease (FOG) Control Program is not currently required. The District does not have restaurants, commercial kitchens, or other food service establishments that generate significant quantities of FOG requiring a source control program. If future development or changes to land use includes food service establishments subject to FOG control requirements, the District will implement an appropriate FOG Control Program, which may include contracting with a qualified third-party agency or consultant to administer the program. The District will consider FOG education for its customers as needed.

VIIb) Preventive Maintenance

The District's preventive maintenance program includes annual cleaning of the entire wastewater collection system, with higher-maintenance sewer segments cleaned more frequently as needed. Routine cleaning, CCTV inspections, and operational observations are used to identify and address any grease accumulation or other conditions that could contribute to blockages.

VIIc) Overflow Investigation

The District investigates sanitary sewer overflows to determine the cause and implements corrective measures as appropriate. If a blockage associated with fats, oils, or grease is identified, maintenance practices are evaluated and modified as necessary to reduce the likelihood of recurrence.

VIIId) Public Education

The District provides information to residents, as appropriate, regarding the proper disposal of fats, oils, and grease to help prevent sewer blockages and protect the wastewater collection system.

Element VIII – System Evaluation and Capacity Assurance Plan

Requirements

D.13(viii) System Evaluation and Capacity Assurance Plan

The SSMP shall include a plan to:

- (a) Assess the current and future hydraulic capacity of the collection system.
- (b) Identify and prioritize capacity-related deficiencies.
- (c) Provide for the design and implementation of capacity enhancement measures, as necessary.
- (d) Ensure rehabilitation and replacement projects are coordinated with system evaluation efforts.

Response

VIIIa) System Evaluation

The District routinely evaluates the condition and performance of its wastewater collection system through preventive maintenance activities, CCTV inspections, manhole inspections, maintenance records, operational observations, and engineering evaluations. Information obtained through these activities is used to identify maintenance needs, prioritize rehabilitation projects, and support long-term capital planning.

VIIIb) Capacity Assessment

The District periodically evaluates the hydraulic capacity of its gravity wastewater collection system as improvements are planned and when system conditions warrant such as new developments. Capacity evaluations consider existing and anticipated wastewater flows, historical operating performance, inflow and infiltration (I&I), proposed development, and other relevant engineering factors. The District has no known hydraulic capacity deficiencies within its wastewater collection system.

Because the District is substantially developed, future capacity planning is focused primarily on maintaining existing system capacity, accommodating redevelopment, and reducing inflow and infiltration through ongoing maintenance, capital improvements, and implementation of the District's Sewer Lateral Ordinance.

VIIIc) Capital Improvements

The District implements an ongoing Capital Improvement Program (CIP) to rehabilitate and replace aging wastewater infrastructure. As a result of the District's long-term rehabilitation program, the majority of the wastewater collection system has been replaced or rehabilitated, allowing the District to focus future capital investments on targeted infrastructure improvements and asset preservation. The remaining significant capital project is replacement of the sewer main crossing beneath U.S. Highway 101. Rehabilitation priorities are established using CCTV inspections, maintenance records, field observations, manhole inspections, and engineering evaluations. Beginning in Fiscal Year 2026–27, the District initiated a comprehensive manhole inspection program to assess the condition of all District-owned manholes over time. Inspection results are incorporated into the District's annual CIP to prioritize rehabilitation and replacement projects.

VIIIId) Coordination

System evaluation, maintenance, and capital improvement planning are coordinated through the District Manager, District Engineer, and maintenance contractors. The CIP is reviewed annually as part of the District's budget process and updated as necessary to maintain system reliability, preserve existing infrastructure, address identified deficiencies, and reduce the potential for sanitary sewer overflows.

Element IX – Monitoring, Measurement, and Program Modifications

Requirements

D.13(ix) Monitoring, Measurement, and Program Modifications

The SSMP shall include a program to:

- (a) Monitor the effectiveness of the SSMP.
- (b) Measure the success of maintenance activities and system improvements.
- (c) Update the SSMP and operational practices as needed to improve performance and reduce sanitary sewer overflows.

Response

IXa) Monitoring

The District routinely monitors the performance of its wastewater collection system through preventive maintenance activities, CCTV inspections, manhole inspections, maintenance records, customer service requests, and review of sanitary sewer overflows (SSOs), if any. The District's maintenance contractor cleans the entire collection system annually, with higher-maintenance sewer segments cleaned every six months. During these activities, the contractor reports observed maintenance, operational, and infrastructure issues to the District for evaluation and, when appropriate, inclusion in the District's maintenance program or Capital Improvement Program (CIP). This information is used to evaluate the effectiveness of the SSMP and identify opportunities for improvement.

IXb) Measurement

The District evaluates the effectiveness of its operations and maintenance program by reviewing system performance, contractor maintenance reports, CCTV inspections, manhole inspection results, inflow and infiltration (I&I), and capital improvement projects. Performance measures include the occurrence and causes of sewer spills, completion of scheduled maintenance activities, implementation of corrective actions, and completion of capital improvements.

IXc) Program Modifications

The District reviews and updates its SSMP, maintenance practices, and Capital Improvement Program as needed based on operational experience, inspection findings, regulatory changes, and engineering evaluations. The District Manager, District Engineer, and maintenance contractors periodically review operational information and recommend modifications to maintenance practices and capital improvements, as appropriate. Program modifications are made to improve system reliability, reduce the potential for SSOs, and maintain compliance with applicable regulatory requirements.

Element X – SSMP Program Audits and Communication Program

Requirements

D.13(x) SSMP Program Audits and Communication Program

The SSMP shall include:

- (a) Periodic audits of the SSMP at least once every two years.
- (b) A communication program to provide the public with information regarding the development, implementation, and performance of the SSMP.

Response

Xa) SSMP Program Audits

The District shall conduct an internal audit of the SSMP at least once every two years in accordance with the State Water Resources Control Board's Waste Discharge Requirements. The audit shall evaluate the effectiveness of the SSMP, document significant program changes, identify any deficiencies, and recommend corrective actions or updates, as appropriate. An audit report shall be prepared and maintained in accordance with State Water Resources Control Board requirements. Audits findings will be used to update maintenance practices, capital improvement planning, and future revisions to the SSMP.

Xb) Communication Program

The District is committed to keeping the public informed regarding the management and operation of its wastewater collection system. The District Manager is responsible for coordinating preparation of SSMP audits, updates, and public communication in consultation with the District Engineer and maintenance contractors. The SSMP and significant updates shall be considered at public meetings of the Board of Directors and made available to the public through the District's website or by request. Information regarding sanitary sewer overflows, capital improvement projects, maintenance activities, and other wastewater system matters is communicated, as appropriate, through Board meetings, public records, and the District's website.

SSMP Appendices

The documents identified below are either attached to this SSMP or incorporated herein by reference. Documents incorporated by reference may be revised periodically as part of the District's normal operations. Unless otherwise required by law or District policy, administrative revisions to these documents do not constitute amendments to this Sewer System Management Plan (SSMP).

Appendix A – Overflow Emergency Response Plan (OERP)

The Alto Sanitary District Overflow Emergency Response Plan (2023) is incorporated into this Sewer System Management Plan by reference and included as Appendix A. The OERP is maintained as a separate District document and shall be used for all sanitary sewer overflow response, reporting, notification, and emergency response activities. Updates to the OERP shall be made in accordance with applicable regulatory requirements and District policy.

Appendix B – Organization Chart and Emergency Contact Information

The District's current organizational chart, emergency contacts, regulatory reporting contacts, and contractor contact information are incorporated herein by reference. Administrative updates to these documents do not constitute amendments to the SSMP.

Appendix C – Collection System Maps

The District's Geographic Information System (GIS) maps and collection system maps are incorporated herein by reference. GIS maps are updated periodically to reflect field verification, completed capital improvements, and improved asset information. Such updates are administrative in nature and do not constitute amendments to the SSMP.

Appendix D – Capital Improvement Program (CIP)

The District's Capital Improvement Program (CIP) is incorporated herein by reference. The CIP is reviewed and adopted annually as part of the District's Operating and Capital Improvement Budget. The current CIP is available on the Alto Sanitary District website. Annual updates to the CIP do not constitute amendments to the SSMP.

Appendix E – Sewer Lateral Ordinance No. 2015-01

The District's current Sewer Lateral Ordinance is incorporated herein by reference. The current ordinance is available on the Alto Sanitary District website. Adoption of a new or amended ordinance by the Board shall automatically supersede the version referenced in this SSMP without requiring a separate SSMP amendment.

Appendix F – SASM Standard Specifications

The Sewerage Agency of Southern Marin (SASM) Standard Specifications are incorporated herein by reference. The current standards and specifications are

available on the SASM website. Updates to the SASM Standard Specifications shall not constitute amendments to this SSMP.

Appendix G – Operational Forms and Templates

Administrative forms used to support implementation of the SSMP are incorporated herein by reference but are not attached to the SSMP. The forms may be revised or replaced by the District Manager as administrative documents without amendment of the SSMP, provided the revisions do not change District policy, regulatory requirements, or Board-adopted procedures.

- Sanitary Sewer Overflow (SSO) Incident Report Form
- SSMP Biennial Audit Checklist
- Annual Preventive Maintenance Summary
- CCTV Inspection Summary
- Manhole Inspection Summary
- Capital Improvement Project Prioritization Worksheet

Alto Sanitary District

SPILL EMERGENCY RESPONSE PLAN

Updated May 2023



V.W. HOUSEN
& ASSOCIATES

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FIGURES

Figure 3.1 Spill Notification Process

Figure 8.1 External Reporting and Response Flowchart

SERP APPENDIX (Attachment 4)

- Contact Information for District Personnel
- Sanitary Sewer Spill Service Call & Field Report Form (Field Report)
- Sample Warning Sign
- Sewage Volume Estimation Methods
- Example Spill Technical Report (Outline)

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LIST OF ACRONYMS

ASD	Alto Sanitary District
BACWA	Bay Area Clean Water Agencies
Cal OES	Office of Emergency Services
CCTV	Closed-Circuit Television
CFR	Code of Federal Regulations
CIWQS	California Integrated Water Quality System
FOG	Fats, Oils and Grease
GPM	Gallons per Minute
LRO	Legally Responsible Official
MGD	Million Gallons per Day
MRP	Monitoring and Reporting Program
NPDES	National Pollution Discharge Elimination System
OERP	Overflow Emergency Response Plan
RWQCB	Regional Water Quality Control Board
SASM	Sewerage Agency of Southern Marin
SERP	Spill Emergency Response Plan
Spill	Sanitary Sewer Spill
SWRCB	State Water Resources Control Board
WDR	General Waste Discharge Requirements

LIST OF TERMS

Bay Area Clean Water Association (BACWA) – Association comprised of Bay Area wastewater treatment and collection system agencies. BACWA represents the interests of public wastewater agencies in regulatory matters and to support the exchange of information.

Website: <http://www.bacwa.org>

Blockage – An object that partially or fully hinders flow through a sewer pipeline. The blockage can be caused by debris in the sewer, grease buildup, root intrusion, or a partial or full collapse of the pipeline. Also known as a stoppage.

California Integrated Water Quality System (CIWQS) – A computer system used by the State and Regional Water Quality Control Boards to track information about Spills, among other information. CIWQS is the tool used for online submittal of spill details, which are then made available to the public. Website: <http://www.swrcb.ca.gov/ciwqs/>

Enrollee – The legal public entity that owns a sanitary sewer system, as defined by the Statewide WDR. Also known as a sewer system agency or wastewater collection system agency.

Infiltration – The seepage of groundwater into a sewer system, including service connections. Seepage frequently occurs through defective or cracked pipes, pipe joints, connections or manhole walls and joints.

Inflow – Water discharged into a sewer system from such sources as roof leaders, cellars, yard and area drains, foundation drains, through holes in manhole covers, cross connections from the storm system or street wash waters. Inflow differs from infiltration in that it is a direct discharge into the sewer rather than a leak through defects in the sewer.

Lateral or Private Lateral – The privately-owned sewer pipeline that conveys wastewater from the premises of a user to the District's sewer system. The upper lateral extends from the building to property line (or easement line). The lower lateral extends from the property or easement line to the connection to the pipe.

Monitoring and Reporting Program – The program used by the District to monitor, maintain records, report issues and complete needed public notifications.

San Francisco Bay Regional Water Quality Control Board – Also known as Region 2 or RWQCB. This regulatory agency preserves, enhances and restores the quality of California's water resources, and ensures their proper allocation and efficient use for the benefit of present and future generations. Website: <http://www.waterboards.ca.gov/sanfranciscobay>

Sanitary Sewer Spill – A discharge of sewage from any portion of the publicly owned sanitary sewer system due to a sanitary sewer system spill, operational failure, and/or infrastructure failure

Sanitary Sewer System – Any 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 wastewater treatment plant.

Sewer System Management Plan – A series of written programs that address how a collection system owner/operator conducts daily business. Each SSMP is unique for an individual discharger. The plan includes provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit.

Spill Emergency Response Plan – This document identifies measures that are needed to respond to sanitary sewer spills in a way that maximizes the protection of public health and the environment.

State Water Resources Control Board – Also called the State Board. This agency developed and passed the Statewide Waste Discharge Requirements for collection systems and maintains the spill reporting web site.

Statewide Waste Discharge Requirements – The Statewide General Waste Discharge Requirements for Sanitary Sewer Systems was adopted by the SWCRB on December 6, 2022 and is known as Order WQ 2022-0103-DWQ.

Wastewater Collection System – See Sanitary Sewer System.

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1 INTRODUCTION

Alto Sanitary District (ASD or District) Spill Emergency Response Plan (SERP) provides guidelines for responding to, cleaning, containing, and reporting spills that occur during the collection system service area.

1.1 SPILL EMERGENCY RESPONSE PLAN OBJECTIVES

The Spill Emergency Response Plan includes measures to protect public health and the environment. This plan includes information to support District response to spills from its system in a timely manner that minimizes water quality impacts and nuisance by:

- Stopping the spill and preventing/minimizing a discharge to waters of the State¹;
- Intercepting sewage flows to prevent/minimize spill volume discharged into waters of the State;
- Recovering, cleaning up and disposing of sewage and wash down water; and
- Cleaning publicly accessible areas while preventing toxic discharges to waters of the State.

1.2 REGULATORY REQUIREMENTS

On May 2, 2006, the State Water Resources Control Board (SWRCB) issued a directive through Order No. 2006-0003-DWQ to require all public wastewater collection system agencies in California with greater than one mile of sewers to be regulated under the Statewide WDR. Portions of this Order related to monitoring and reporting were amended by Order No. 2013-0058-EXEC, dated July 30, 2013. All of the previous SWRCB Orders were superseded by Order No. 2022-0103-DWQ, effective June 5, 2023, which is referenced in this document as the Statewide WDR.

The Statewide WDR requirements for the Spill Emergency Response Plan are listed below.

The District must develop and implement a spill emergency response plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. At a minimum, this plan must include procedures to:

- Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;
- Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;
- Comply with the notification, monitoring and reporting requirements of the Statewide WDR, State law and regulations, and applicable Regional Water Board Orders;

¹ Waters of the State include any surface water or groundwater, including saline waters, within the boundaries of the state as defined in Water Code section 13050(e), and are inclusive of waters of the United States.

- Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained;
- Address emergency system operations, traffic control, and other necessary response activities;
- Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;
- Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;
- Remove sewage from the drainage conveyance system;
- Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;
- Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;
- Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;
- Conduct post-spill assessments of spill response activities;
- Document and report spill events as required by the Statewide WDR; and
- Annually, review and assess effectiveness of the Spill Emergency Response Plan and update it as needed.

2 SPILL CATEGORIES

Four categories of spills, Categories 1 through 4, are defined in the Statewide WDR, as defined in Table 2.1. For reporting purposes, the Statewide WDR also has requirements for a “No Spill” category.

All agencies that own or operate sanitary systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility are required to report all spills, excluding private lateral spills. The District documents and files information on private lateral spills when notified.

TABLE 2.1 STATEWIDE WDR SPILL CATEGORIES

Category 1	A spill of any volume of sewage from or caused by a sanitary sewer system or publicly owned lateral that results in a discharge to: - A surface water, including a surface water body that contains no flow or volume of water; or - A drainage conveyance system that discharges to surface waters when the sewage is not fully captured and returned to the sanitary sewer system or disposed of properly. Any spill volume not recovered from a drainage conveyance system is considered a discharge to surface water, unless the drainage conveyance system discharges to a dedicated stormwater infiltration basin or facility.
Category 2	A spill from a sewer main of 1,000 gallons or greater that does not discharge to a surface water.
Category 3	A spill from a sewer main of 50 gallons or greater and less than 1,000 gallons that does not discharge to a surface water.
Category 4	A spill from a sewer main of less than 50 gallons that does not discharge to a surface water.

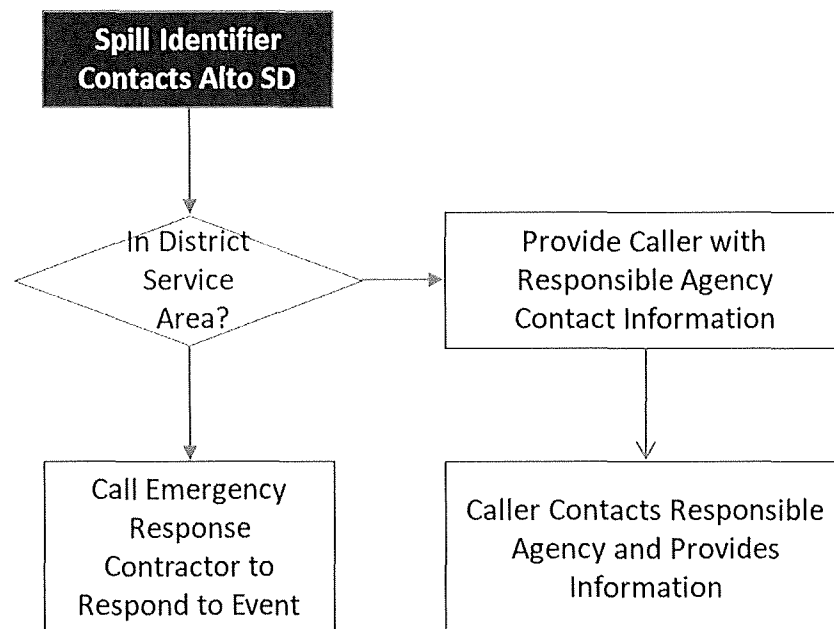
3 NOTIFICATION PROCEDURES

The District has adopted service call / spill response procedures requiring immediate response to minimize or eliminate impacts resulting from the spill. The District contracts with an emergency response contractor that provides all necessary spill response supplies.

When a notification of a spill is received, it should be clearly communicated who will respond, the estimated time of arrival, and what areas will need to be accessed. The information provided by the caller should be verified before dispatching a field crew. This includes verifying the address and nearest cross street and making sure it is part of the District's conveyance system. If not, provide the caller with the phone number of the responsible agency and follow up by calling the agency and providing the details of the call.

Contact information for neighboring agencies is included in Table 8.2. Figure 3.1 summarizes the District's process for spill notification and response.

FIGURE 3.1. SPILL NOTIFICATION PROCESS



3.1 Roles for Responding to Spills

Currently, the following positions are responsible for responding to spills:

- First Responder to Spill: Emergency Response Contractor
- Claims Processing: District Manager

The contact information for those currently holding the positions named above are shown in the Appendix.

3.2 Notification by Field Staff or the Public

Public observation is the most common way that the District is notified of blockages and spills. Contact information for reporting sewer spills and backups is in the phone book and on the website: <http://altosanitarydistrict.org>. The District office telephone number is (415) 388-3696. The phone message allows direct selection of the current emergency response contractor, Roto-Rooter, via phone number (415-388-2740) for an emergency. The sewer maintenance contractor provides emergency response 24 hours, 7 days per week.

When District staff receives a call reporting a sewer spill or backup, the staff member takes the information from the caller. The person who took the call communicates appropriate information to the District Manager, or appropriate District personnel, along with any information collected. The person who took the call, and/or the District Manager, or other appropriate District personnel then notifies the emergency response contractor, who responds to the incident and files a report to the District as soon as possible.

The individual receiving the call should collect the information listed in Table 3.1.

TABLE 3.1. INFORMATION TO GATHER FROM CALLER OF POTENTIAL SPILL

Call Notes from Potential Spill – Conversation Checklist

- Date and time of call;
- Date and time the caller first noticed the spill, if available;
- Specific location of the potential problem;
- Narrative description of the complaint, including any information the caller provided regarding whether the spill has reached surface waters or a drainage conveyance system, if available;
- Caller's contact information, if available; and
- Additional supportive information such as whether the caller smells any odor, or whether the appearance was at a cleanout or manhole would be beneficial.
- Document on the same record the final resolution of the call.

3.3 Staff Observation

District contractors perform periodic work on its sewer system facilities. Any problems noted with the sewer system facilities are reported to District staff, or in an emergency, the District phone number above for further action.

3.4 Reporting Deadlines

Statewide WDR has mandatory timelines for reporting spill events that are summarized in Table 3.2 on the following page.

TABLE 3.2 REGULATORY REPORTING TIMELINES

Element	Requirement	Method
NOTIFICATION	Category 1 Spill of 1,000 Gallons or Greater: • Notify OES within two hours of becoming aware of the spill • Obtain an OES notification control number. • Also notify Marin County Environmental Health, and the County Health Officer	• Call Cal OES at: (800) 852-7550 • County Health Officer (415) 473-3707 and Marin County Environmental Health Services (EHS) (415) 473-6907 are also to be contacted. • During evenings/weekends, call the Sheriff Communication Center at (415) 479-2311.
REPORTING	Category 1 Spill: • Draft Report within three business days of becoming aware of the spill LRO certifies within 15 calendar days of spill end date • Spill Technical Report within 45 calendar days after the spill end date if 50,000 gallons or more Category 2 Spill: • Draft Report within 3 business days of becoming aware of the spill LRO certifies within 15 calendar days of the spill end date Category 3 & 4 Spills: • CAT 3 - Certified report within 30 calendar days of the end of month in which the spill occurred • CAT 4 - Monthly the estimated total spill volume exiting the sanitary sewer system, and the total number of all Category 4 spills within 30 calendar days after the end of the calendar month in which the spills occurred • LRO certifies annually a report of all Category 4 spills, by February 1 after the end of the calendar year in which the spills occurred "No Spill" Certification • LRO certifies that no Spill occurred within 30 calendar days of the end of the month in which there are no spills.	• Enter data into the CIWQS Online Spill Database (http://ciwqs.waterboards.ca.gov/), certified by the Legally Responsible Official(s). • All information required by CIWQS will be captured in the Sanitary Sewer Spill Report. • Certified spill reports may be updated by amending the report or adding an attachment to the spill report within 90 calendar days after the spill end date. After 90 days, the State Spill Program Manager must be contacted to request to amend a spill report along with a justification for why the additional information was not available prior to the end of the 90 days.
WATER QUALITY MONITORING	The District will conduct water quality sampling within 18 hours after being aware of Category 1 spills in which 50,000 gallons or greater are spilled to surface waters. EHS may require daily water quality sampling until compliance is achieved.	Water quality results will be included in the Spill Technical Report for Category 1 spills in which 50,000 gallons or greater reach surface waters.

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4 SPILL RESPONSE PROGRAM

This section describes responsibilities, priorities, and field response activities related to spills.

Alto Sanitary District has contracted with an emergency response contractor to provide First Responder and emergency response 24 hours, 7 days per week. The emergency response contractor receives calls from residents of the District reporting sewage spills. The current agreement with the emergency response contractor was reviewed and approved by Marin County Counsel, acting as the District's Counsel in the matter. District staff review annually the USA and response program with the contractor, and refer to the latest state requirements for spill response requirements for maintenance team training, and worker safety. Alto, along with SASM and its member agencies are currently soliciting proposals for renewal of the sewer maintenance contract.

The Contractor maintenance team has maps in all the trucks and will call for additional assistance if required, keeping the District Manager informed during emergency events. They perform first responder duties and then submit a response report to the District for review, submittal to CWIQS, and to receive follow up instructions.

The following additional Emergency Contractor resources are available to the District Manager to address spills:

- Roto Rooter Sewer Service: 415-388-2740
- Roy's Sewer Service: 415-381-0256
- SASM Staff: 415-388-2402
- Maggiora and Ghilotti Contractors: 415-459-8640
- Team Ghilotti Contractors: 707-763-8700
- Presidio Systems, Inc. TV and Pumping: 925-456-8400
- Hardiman Pipelines: 415-847-0010

Following are additional entities and contact information for matters related to sewer spills:

- In Case of Emergency: 911
- County Sheriff Dispatch: (415) 473-7250
- Office of Emergency Services: (800) 852-7550
- District Manager: (415) 388-3696
- Contract Responder – Roto-Rooter: (415) 388-2740 or (415) 898-2700
- Agencies:
 - California Regional Water Quality Control Board: (510) 622-2300

- California Department of Fish and Wildlife Services: (707) 944-5500
- County Environmental Health Services: (415) 473-6907
- California Office of Emergency Services: (800) 852-7550
- U.S. Coast Guard : (415) 399-3530

4.1 First Responder Priorities

The first responder's priorities are as follows:

- To follow safe work practices, including those related to traffic control, confined space, and employee and public safety
- To respond promptly with the appropriate equipment
- To evaluate the cause of spill and determine responsibility
- To restore the flow as soon as possible
- To contain the spill whenever feasible
- To minimize public access to and/or contact with the spilled sewage

4.2 Safety

The First Responder is responsible for following safety procedures at all times. Special safety precautions must be observed when performing sewer work. Special consideration should be given to following all local traffic, confined space, and safety procedures.

4.3 Initial Response

Contract on-call personnel are required to be on site within 60 minutes of being notified, with the objective of minimizing and/or eliminating the spill. Each service technician has been provided with a set of the District's system maps to facilitate their efforts.

The Contractor immediately advises the District Manager of the event. As necessary, the Engineering Consultant is brought into the matter to recommend procedures for remedying the situation.

The First Responder determines appropriate response measures based on the circumstances and information provided by the caller (e.g., weather and traffic conditions, small backup vs. sewage flowing on the ground, etc.). If additional help is needed, they contact other employees, contractors, and/or equipment suppliers.

Contact information for the District personnel is available in the Appendix. A comprehensive emergency contact list is also found in the Appendix.

Upon arrival at the site, the First Responder should complete the following:

- Note arrival time at spill site, and include the time in the Spill Reporting Form. Record basic incident information on site, and complete the form after finishing the response;
- Verify the existence of a sewer system spill;
- Field-verify the address and nearest cross street, and confirm that the spill is part of the District's sewer/conveyance system;
- Conduct visual monitoring to determine immediate actions, starting with documentation of spill volume using the methods included in the Appendix;
- If flow cannot be restored, contain, mitigate, and minimize impacts from the spill, and restore flow;
- If the blockage cannot be cleared within a reasonable time, or the sewer requires construction repairs to restore flow, then initiate containment and/or bypass pumping;
- Identify and clearly assess the affected area and extent of spill, including possible impacts on surface water. Where it is safe and practical, conduct receiving water visual observations as described in Section 4.8;
- The California Department of Fish and Wildlife (CDFW) should be notified in the event a spill impacts any creeks, gullies, or natural waterways. CDFW will provide guidance associated with cleanup. Cleanup should proceed quickly, and any water used in the process should be dechlorinated prior to use;
- Post signs as required;
- Notify the District Manager if:
 - The spill appears to be large (over 1000 gallons), in a sensitive area, may imminently and substantially endanger human health, results in fish kills, if there is doubt regarding the extent, impact, or how to proceed, or if additional help is needed for line cleaning or repair, containment, recovery, lab analysis, and/or site cleanup;
- Where safe and feasible, take necessary water quality samples at the point of discharge and at upstream and downstream locations. Use best judgment and consult with the District Manager and Consulting Engineer if uncertain. Water quality monitoring is not given precedence over stopping the spill or protecting public health. However, if sufficient personnel are available, monitoring is conducted in parallel with these activities or with the cleanup effort;
- Comply with all safety precautions (traffic, confined space, etc.);
- Contact caller, if time permits. Identify spill cause, including conducting CCTV inspection as appropriate;
- Document all activities through photos and written documentation.

The First Responder should provide the completed Spill Reporting Form to the District Manager for input into the computerized maintenance management system. Contact information is included in the Appendix.

4.4 Internal Spill

Upon arrival at the location of a spill into a house or a building, the First Responder should evaluate and determine if the spill was caused by a blockage in the lateral or in the District owned sewer main, caused either by a backup in the sewer main line or nearby operations and maintenance activities.

- If a blockage is found in a property owner's lateral, it should be clearly communicated that it is not the District's responsibility to work on a private lateral. The homeowner is responsible for clearing any blockage in the home's plumbing system or private lateral and for any resulting flood damage to the structure. The homeowner is also responsible for damage that happens because a lateral was not properly installed.
- If a backup in the main line is found to have caused the spill in a house or building, the First Responder should take steps to address the issue as described above.
- The First Responder should attempt to instruct the property owner as to the following guidelines:
 - Keep all family members and pets away from the affected area.
 - Place towels, rags, blankets, etc between areas that have been affected and areas that have not been affected.
 - Move any uncontaminated property away from the spill area. Do not remove any contaminated items.
 - Turn off the HVAC system.
- The First Responder should take the following steps to assist the homeowner:
 - Gather information.
 - Call a restoration company and wait for the restoration firm to arrive.
 - Forward incident reports and related documents to the District Manager.

4.5 Restore Flow

The First Responder should attempt to remove the blockage from the system and restore flow to the area. Using the appropriate cleaning tools, the field crew should set up downstream of the blockage and hydroclean upstream from a clear manhole. The flows should be observed to ensure that the blockage does not recur downstream.

If the blockage cannot be cleared within a reasonable time, or sewer requires construction repairs to restore flow, then initiate containment and/or bypass pumping.

4.6 Containment and Bypass

The First Responder should attempt to contain as much of the spilled sewage as possible using the following steps:

- Determine the immediate destination of the spill.
- Plug storm drains using available equipment and materials 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/pump station or vacuum flow from upstream of the blockage and dispose of downstream of the blockage to prevent further spills.
- If a spill reaches a water body, follow the requirement in Section 4 of this document for posting and spill notification signage. Also see Section 4.8 for Water Quality Sampling requirements.

4.7 Spill Notification Signage and Restrict Public Access

Barriers shall be installed to prevent the public from having contact with the sewage if possible. Signs should be posted to keep vehicles and pedestrians away from contact with spilled sewage. Signs should remain in place until removal of the signs is directed by the District Manager.

If a creek, stream and/or beach have been contaminated as a result of a spill, notifications should be posted at visible access locations until the risk of contamination has subsided to acceptable background levels. The warning signs, once posted, should be checked every day to ensure that they are still in place. "Closed" signs should be posted at the outfall and a minimum of 100 feet upstream and 100 feet downstream of the discharge. If there is a large volume of sewage, more signs must be posted downstream. Signs must remain posted until at least two consecutive days of sampling meet the Public Beach Sanitation and Ocean Water-Contact Sports standards.

The removal of signs must be approved by EHS and the County Public Health Officer.

A sample warning sign is included in the Appendix.

4.8 Impact to Surface Waters

If a spill is confirmed to have entered surface waters, the District Manager shall be immediately notified. The response team then proceeds with the following additional activities:

- Determine the extent of the spill by investigating downstream until there is no evidence of sewage or debris along the creek or water body.

- Conduct Water Quality Sampling, following the process described below. If the spill is 50,000 gallons or greater, collect water quality samples **within 18 hours** of becoming aware of the spill .
- EHS requires daily water quality sampling until compliance is achieved, for Category 1 discharges of 1,000 gallons or greater that reach surface water.
- Immediately post contaminated water sign(s) and protect the waterbody from public access on all sides.
- Photograph sign placement and evidence of the spill in and around the waterbody to the farthest point reached by the sewage.
- Determine if the waterbody is safe to enter. During the winter storm season, cleaning the waterbody may not be feasible due to high water flows.
- If feasible, block the waterbody downstream of the affected area in a location that is safe to enter and is accessible to set up a pump or utilize other sewer cleaning equipment.
- To the extent feasible, recover and return contaminated water to the collection system.
- Perform follow-up sampling until the area shows no water quality impairment and the posted signs can be removed. The District Manager ultimately determines when this happens and makes any follow up calls to affected agencies.

4.8.1 Receiving Water Visual Observations

Through visual observations and use of best available spill volume-estimating techniques and field calculation techniques, the response team shall gather and document the following information for spills discharging to surface waters.

- Estimated spill travel time to the receiving water;
- For spills entering a drainage conveyance system, estimated spill travel time from the point of entry into the drainage conveyance system to the point of discharge into the receiving water;
- Estimated spill volume entering the receiving water; and
- Photography of:
 - Waterbody bank erosion,
 - Floating matter;
 - Water surface sheen;
 - Discoloration of receiving water; and
 - Impact to the receiving water.

4.8.2 Water Quality Sampling and Analysis for Category 1 Spills of 50,000 Gallons or More

Water quality sampling and testing are required for sanitary sewer spills that are 50,000 gallons or greater and reach surface water. Sampling and testing may be required for spills less than 50,000 gallons as required by the Marin County Health Officer. The purpose of testing is to determine the extent and impact of the spill. The following guidelines must be followed:

- The First Responder should notify the District Manager to collect samples. Samples should be collected as soon as possible after the discovery of the spill event;
- If sampling is required by the County for spills less than 1,000 gallons, at a minimum, samples should be collected at the discharge point, 100 feet upstream, and 100 feet downstream;
- Sample locations required by the Statewide WDR are listed in the Table 4.1 on the following page. The County may require additional sample locations;
- Samples must be collected **within 18 hours** of initial knowledge of the spill event; and
- Records of monitoring information should include the date, exact place, and time of sampling or measurements, the individual(s) who performed the sampling or measurements, the date(s) analyses were performed, the individual(s) who performed the analyses, the analytical technique or method used, and the results of such analyses.

The required water quality sampling procedures are as follows:

- Collect one water sample, each day of the duration of the spill, upstream of the spill entry point if sewage discharges to a surface water via a drainage conveyance system; and/or
- Three receiving water sampling locations (upstream, at the spill entry point, and downstream).
- If the receiving water has no flow during the duration of the spill, report “No Sampling Due to No Flow” for the receiving water sampling locations;
- Analyze the collected receiving water samples for **Ammonia** and the appropriate other bacterial indicator(s) that include one or more of the following, unless directed otherwise by the Regional Water Board: **Total Coliform Bacteria, Fecal Coliform Bacteria, E-coli, and/or Enterococcus**; and
- Collect and analyze additional samples as required by the applicable Regional Water Board Executive Officer or designee.

Sample locations are described further in Table 4.1 on the following page. The distance above and below the sample point should be selected by the District as appropriate for the spill location.

TABLE 4.1 SAMPLING OF FLOW FOR SPILLS 50,000 GALLONS OR GREATER

Sampling Location	Description
DCS-001	A point in a drainage conveyance system before the drainage conveyance system flow discharges into a receiving water.
RSW-001 Point of Discharge	A point in the receiving water where sewage initially enters the receiving water.
RSW-001U: Upstream of Point of Discharge	A point in the receiving water, upstream of the point of sewage discharge, to capture ambient conditions absent of sewage discharge impacts.
RSW-001D: Downstream of Point of Discharge	A point in the receiving water, downstream of the point of sewage discharge, where the spill material is fully mixed with the receiving water.

- Sample analysis must be conducted according to sufficiently sensitive test methods approved under 40 Code of Federal Regulations Part 136 for the sample analysis of pollutants. A method is considered sufficiently sensitive when the minimum level of the analytical method approved under 40 Code of Federal Regulations Part 136 is at or below the receiving water pollutant criteria; and
- The analysis of water quality samples required per this General Order must be performed by a laboratory that has accreditation pursuant to Article 3 (commencing with section 100825) of Chapter 4 of Part 1 of Division 101 of the Health and Safety Code. (Water Code section 13176(a).) The State Water Board accredits laboratories through its Environmental Laboratory Accreditation Program (ELAP). Additional sites may require sampling, following the requirements of the County Environmental Health Services (EHS) department.

In addition, the District's water quality sampling procedures, which are the same as the EHS procedures, are:

- Keep the sterile collection bottle closed until it is to be filled. Do not contaminate inner surface of the lid or bottle rim;
- Collect water sample just below the surface in knee deep water, approximately 3 feet deep (full arm's length), without rinsing. If needed, extend the sampling pole to the fullest length to reach deeper water depth. Minimize contact with bank or beach bed as water fouling may occur;
- Remove cap and hold the bottle near its base and plunge it, neck downward, below the surface;
- Turn bottle until neck points slightly upward and mouth is directed toward the current. Fill bottle leaving about 1 inch of air to allow lab to mix by shaking. Collect a minimum of 100 mL. (If applicable, insert sterile collection bottle into the holder on the sample

pole. Extend the sample pole and plunge bottle end into the water, bottle opening downward);

- Immediately place cap securely on bottle to avoid leaks and contamination;
- Dry the bottle;
- Label container with distinctive sample site name, date, and time collected; and
- Complete the laboratory requisition slip with requested information (site, bottle number, collector, date and time of collection, type of sample, test requested, name and phone number of responsible person for reporting purposes, and deliverer name). Note any field observations that may have occurred during the sampling.
- Test samples for fecal coliform, total coliform, and enterococcus (also ammonia testing may be optional). The method of analysis for ammonia should be a readily available, good quality test kit, suitable for field analysis.

Samples should be stored and shipped according to the following procedures:

- Place water sample bottle in a cooler with frozen blue ice. Water sample must be kept cool. Ice may be used but care must be taken so water samples are not contaminated or diluted by the ice.
- Bring to a California state-certified laboratory within 8 hours of collection. For compliance tests, the holding time must not exceed 8 hours from the time of collection to time of processing or the tests will be invalidated. Other water tests for non-compliance purposes may be held below 10 degrees C until the time of analysis, up to 24 hours.

Water samples may be taken to the Water samples may be taken to the **SASM Laboratory at 450 Sycamore Avenue, Mill Valley, CA 94941, (415) 388-2402**. The water samples must be brought to the laboratory within 8 hours of collection, before 3:00 pm, for processing.

If the SASM laboratory is closed, utilize an alternate testing laboratory managed by:

Caltest Analytical Laboratory at 1885 N Kelly Rd., Napa, CA 94558, (707) 258-4000, Toll Free 888-258-TEST (8378), Fax: 707.226.1001 or

Brelje and Race Laboratories, 425 S E St., Santa Rosa, CA 95404, (707) 544-8807.

Records of monitoring information shall include the date, exact place, and time of sampling or measurements, the individual(s) who performed the sampling or measurements, the date(s) analyses were performed, the individual(s) who performed the analyses, the analytical technique or method used, and the results of such analyses.

4.8.3 Spill Technical Report

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

1. Spill causes and circumstances, including at minimum:

- a) Complete and detailed explanation of how and when the spill was discovered;
 - b) Photographs illustrating the spill origin, the extent and reach of the spill, drainage conveyance system entrance and exit, receiving water, and post-cleanup site conditions;
 - c) Diagram showing the spill failure point, appearance point(s), the spill flow path, and ultimate destinations;
 - d) Detailed description of the methodology employed, and available data used to calculate the discharge volume and, if applicable, the recovered spill volume;
 - e) Detailed description of the spill cause(s);
 - f) Description of the pipe material, and estimated age of the pipe material, at the failure location;
 - g) Description of the impact of the spill;
 - h) Copy of original field crew records used to document the spill; and
 - i) Historical maintenance records for the failure location.
2. The District's response to the spill:
- a) Chronological narrative description of all actions taken by the District to terminate the spill;
 - b) Explanation of how the Spill Emergency Response Plan was implemented to respond to and mitigate the spill; and
 - c) Final corrective action(s) completed and a schedule for planned corrective actions, including:
 - i) Local regulatory enforcement action taken against an illicit discharge in response to this spill, as applicable,
 - ii) Identifiable system modifications, and operation and maintenance program modifications needed to prevent repeated spill occurrences, and
 - iii) Necessary modifications to the Spill Emergency Response Plan to incorporate lessons learned in responding to and mitigating the spill.
3. Water Quality Monitoring, including at minimum:
- a) Description of all water quality sampling activities conducted;
 - b) List of pollutant and parameters monitored, sampled and analyzed;
 - c) Laboratory results, including laboratory reports;
 - d) Detailed location map illustrating all water quality sampling points; and
 - e) Other regulatory agencies receiving sample results (if applicable).

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

The District Manager is responsible for managing the development of the Spill Technical Report, and for certifying and submitting the report. An outline for the Spill Technical Report is included in the Appendix.

4.8.4 Spill Notification Signage

Barriers shall be installed to prevent the public from having contact with the sewage. Signs should be posted to keep vehicles and pedestrians away from contact with spilled sewage. A sample warning sign is included in the Appendix.

If a creek, stream and/or beach have been contaminated as a result of a spill, notifications should be posted at visible access locations until the risk of contamination has subsided to acceptable background levels. The warning signs, once posted, should be checked every day to ensure that they are still in place. "Closed" signs should be posted at the outfall and a minimum of 100 feet upstream and 100 feet downstream of the discharge. If there is a large volume of sewage, more signs must be posted downstream.

Signs must remain posted until the removal of signs is approved by EHS and the County Public Health Officer.

5 RECOVERY AND CLEANUP

The recovery and clean up phase begins immediately after the flow has been restored and the spilled sewage has been contained to the extent possible.

5.1 Recovery of Spilled Sewage

Vacuum up or pump the spilled sewage and to the extent possible, discharge the water back to the sanitary sewer system.

5.2 Clean Up and Disinfection

Clean up and disinfection procedures should be implemented to reduce the potential for human health issues and adverse environmental impacts that are associated with a spill event. The procedures described are for dry weather conditions and should be modified as required for wet weather conditions. Cleanup should proceed quickly in order to minimize negative impact. Any water that is used in the cleanup process should be dechlorinated prior to use.

5.2.1 Private Properties

Spills inside houses or buildings should be cleaned up by a professional cleaning company. Contact information for professional cleaning companies can be found in the “Water Damage Restoration” section of the Yellow Pages. Claims by homeowners should be forwarded to the District Manager.

5.2.2 Guidelines for Cleanup

On **hard surface areas**, collect all signs of sewage solids and sewage-related material either by hand or with the use of rakes and brooms. Allow the area to dry. Repeat the process if additional cleaning is required.

On **landscaped or unpaved areas**, collect all signs of sewage solids and sewage-related material either by hand or with the use of rakes and brooms. Allow the area to dry. Repeat the process if additional cleaning is required.

If the spill has reached the **storm drain system**, the combination sewer cleaning truck should be used to vacuum/pump out the catch basin and any other portion of the storm drain that may contain sewage. In the event that a spill occurs at night, the location should be re-inspected as soon as possible the following day. The operator should look for any signs of sewage solids and sewage-related material that may warrant additional cleanup activities.

5.2.3 Wet Weather Modifications

Omit flushing and sampling during heavy storm events with heavy runoff where flushing is not required and sampling would not provide meaningful results.

5.3 Estimate the Volume of Spilled Sewage

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

5.4 Post-Spill Assessment

For each spill event greater than 1000 gallons, all participants involved in the response – from the person who received the call to the last person to leave the site – should meet, as soon as feasible, after the event to review and evaluate the incident and District response procedures. The objective of the post-spill debrief is to determine actions necessary, if any, to reduce the recurrence and better mitigate the effects of spills.

6 PUBLIC NOTIFICATION

6.1 Spills that Do Not Reach Surface Waters

For spills that are contained and do not release unrecovered sewage into a storm drain, stream or a surface water body, notification to the public shall be accomplished through the use of signs at the location of the spill. See Section 4 and the Appendix for guidelines on the installation of signs for these types of spills.

6.2 Public Contact

The District Manager shall be responsible for public notification, if necessary.

7 SPILL DOCUMENTATION

In accordance with the WDR, the District should maintain the following records for each sanitary sewer spill. Records are maintained at the District office.

1. Records are retained for at least five (5) years
2. Records are readily available, either electronic or hard copies, for review by Water Board staff during onsite inspections or through an information request
3. Records are retained for each of the following spill-related events and activities:
 - a. Spill event complaints
 - b. Category 4 spills (in addition to records for Cat 1 through 3 spills listed under Reporting)
 - c. Sewer system telemetry records
 - d. Sewer system management plan implementation records
 - e. Audit records
 - f. Equipment Records
 - g. Work orders

This section also lists spill-specific documentation that is required, which includes spill location and spread and volume estimation.

Specific requirements for recordkeeping are listed further in the sections below.

7.1 Responsibilities

The District Manager will prepare a file for each individual spill.

7.2 Spill Event Complaints

The District shall maintain records for each of the following spill-related events and activities:

- Spill event complaint, including but not limited to records documenting how the District responded to notifications of spills. Each complaint record must, at a minimum, include the following information:
 - Date, time, and method of notification;
 - Date and time the complainant first noticed the spill, if available;
 - Narrative description of the complaint, including any information the caller provided regarding whether the spill has reached surface waters or a drainage conveyance system, if available;
 - Complainant's contact information, if available; and

- Final resolution of the complaint.
- Records documenting the steps and/or remedial action(s) undertaken by the District;
- Records documenting how estimate(s) of volume(s) and, if applicable, volume(s) of spill recovered were calculated;
- All California Office of Emergency Services notification records, as applicable; and
- Water quality monitoring records.

7.3 Supplemental Recordkeeping of Category 4 Spills

The District shall maintain the following supplemental records for each individual Category 4 spill:

1. Contact information: Name and telephone number of District contact person to respond to spill-specific questions;
2. Spill location name;
3. Description and GPS coordinates for the system location where the spill originated;
4. Did the spill reach a drainage conveyance system? If Yes:
 - a. Description of drainage conveyance system location;
 - b. Estimated spill volume fully recovered within the drainage conveyance system;
 - c. Estimated spill volume remaining within the drainage conveyance system; and
 - d. Estimated total spill volume exiting the sanitary sewer system.
5. Spill date and start time;
6. Spill cause(s) (for example, root intrusion, grease deposition, etc.);
7. System failure location (for example, main, pump station, etc.);
8. Description of spill response activities including description of immediate spill containment and cleanup efforts;
9. Description of how the volume estimation was calculated, including, at minimum:
 - a. The methodology and type of data relied upon, including supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered); and
 - b. The methodology and type of data relied upon to estimate the spill start time, on-going spill rate at time of arrival (if applicable), and the spill end time.
10. Description of implemented system modifications and operating/maintenance modifications.

7.4 Recordkeeping for Total Annual Spill Information

The District shall keep the following records summarizing annual spills:

1. Estimated total annual spill volume;
2. Description of spill corrective actions, including at minimum:
 - a. Local regulatory enforcement action taken against the sewer lateral owner in response to a spill, as applicable; and
 - b. System operation, maintenance and program modifications implemented to prevent repeated spill occurrences at the same spill location.

7.5 Sewer System Telemetry Records

The District shall maintain the following sewer system telemetry records if used to document compliance with Statewide WDR, as applicable:

1. Supervisory control and data acquisition (SCADA) system(s);
2. Alarm system(s);
3. Flow monitoring device(s) or other instrument(s) used to estimate sewage flow rates, and/or volumes;
4. Computerized maintenance management system records; and
5. Asset management-related records.

7.6 Sewer System Management Plan Implementation Records

The District shall maintain records documenting the implementation of its Sewer System Management Plan, including documents supporting its Sewer System Management Plan audits, corrections, modifications, and updates to the Sewer System Management Plan.

7.7 Audit Records

The District shall maintain, at minimum, the following records pertaining to its Sewer System Management Plan audits, and other internal audits:

1. Completed audit documents and findings;
2. Name and contact information of staff and/or consultants that conducted or involved in the audit; and
3. Follow-up actions based on audit findings.

7.8 Equipment Records

The District shall maintain a log of all owned and leased sewer system cleaning, operational, maintenance, construction, and rehabilitation equipment.

7.9 Work Orders

The District shall maintain record of work orders for operations and maintenance projects.

7.10 Spill Specific Monitoring (Documentation)

Spill-specific monitoring means the gathering of information and data for a specific spill event to be reported or kept as records. The WDR requires the following assessments, as a component of data gathering following a spill.

7.10.1 Spill Location and Spread

The District shall visually assess the spill location(s) and spread using photography, global positioning system (GPS), and other best available tools. The District shall document the critical spill locations, including:

- Photography and GPS coordinates for:
 - The system location where spill originated; or
 - For multiple appearance points of a single spill event, the points closest to the spill origin.
- Photography for:
 - Drainage conveyance system entry locations;
 - The location(s) of discharge into surface waters, as applicable;
 - Extent of spill spread; and
 - The location(s) of clean up.

7.10.2 Spill Volume Estimation

The District shall estimate the total spill volume using updated volume estimation techniques, calculations, and documentation for electronic reporting. The District shall update its notification and reporting of estimated spill volume (which includes spill volume recovered) as further information is gathered during and after a spill event, including:

- Initial service call information;
- Spill Report Form;
- Copies of the certified CIWQS report forms including volume estimate;
- CCTV inspection if completed;
- Water quality sampling and test results, if applicable; and
- Spill Technical Report if prepared.

7.11 Other Records

In addition to the abovementioned records, the following additional records should also be retained for all spills when available and as applicable:

- All original recordings for continuous monitoring instrumentation
- Service call records and complaint logs of calls received by the District for the previous five years
- Work orders, work completed, and any other maintenance records from the previous five years that are associated with spills
- Documentation of performance and implementation measures for the previous five years

8 REGULATORY REPORTING

This section describes the requirements that have been established for reporting of spills to the regulatory agencies.

Table 8.1 summarizes key deadlines to be aware of for spill reporting. Table 8.2 lists all regulatory reporting requirements and timelines that are also described further in this section. Table 8.3 lists contact information for spill reporting.

Figure 8.1 presents a flow chart showing the external reporting and response requirements based on the type of spill.

TABLE 8.1. KEY DEADLINES FOR SPILL REPORTING

2 HOURS of being aware of spill	Call Office of Emergency Services & Health Department if Category 1 sewer main spill is 1000 gallons or more
3 BUSINESS DAYS of being aware of spill	Submit draft reports to CIWQS for Category 1 and sewer main or Category 2 sewer main spills
15 CALENDAR DAYS from spill end date	Certify Category 1 and Category 2 spills
30 CALENDAR DAYS from end of month if applicable	Certify Category 3 and/or Category 4 sewer main spills or submit "No Spill" report
45 CALENDAR DAYS from spill end date	Submit Spill Technical Report for spills 50,000 gallons or larger that reach Waters of the State
90 CALENDAR DAYS from spill end date (Cat 1 or 2) or certified spill report due date (Cat 3)	Submit amended spill report for Category 1 through 3 spills
FEBRUARY 1 of each year	Submit Category 4 spill summary report

TABLE 8.2. SPILL REPORTING REQUIREMENTS

If spill	Then Notify
Category 1 Spill: 1000 gallons or more reaching a surface water or with the potential to reach a surface water.	2-Hour Notification to Cal OES: (800) 852-7550. Ask for an OES Control Number (for RWQCB). County Health Officer (415) 473-3707 and Marin County Environmental Health Services (EHS) (415) 473-6907 are also to be contacted. During evenings/weekends, call the Sheriff Communication Center at (415) 473-7250. Within 3 Business Days of having knowledge of spill report to SWRCB using CIWQS Within 15 Calendar Days of Conclusion of Response certify by LRO using CIWQS Within 45 Calendar Days of Conclusion of Response submit Spill Technical Report via CIWQS online database if 50,000 gallons or more Additional Notification as Needed – California DFWS: (707)-944-5500
Category 2 Spill: 1,000 gallons or more without the potential to reach surface waters.	Within 3 Business Days of having knowledge of spill report to SWRCB using CIWQS. Within 15 Calendar Days of Conclusion of Response certify by LRO using CIWQS.
Category 3 Spill: 50 gallons to 999 gallons without the potential to reach surface waters. Category 4 Spill: 49 gallons or less, not reaching surface waters.	Within 30 Calendar Days past End of Month with Spill Event, report to SWRCB and certify by LRO using CIWQS. By February 1 of the Year Following the Year in Which Cat 4 Spills Occurred submit annual report to SWRCB and Certify by LRO using CIWQS.
No Spill Reporting: (no spills in month.	Within 30 Calendar Days past End of Month report by LRO to SWRCB using CIWQS.
Member Agency spill (respond and then contact member agency)	SASM: (415) 388-2402 City of Mill Valley: (415) 388-4033 Homestead Valley Sanitary District: (415) 388-4796 Alto Sanitary District: (415) 388-3696 Almonte Sanitary District: (415) 388-8775 Tamalpais Community Services District: (415) 389-8722
Annual Report (Was Collection System Questionnaire)	Update and certify April 1 beginning in 2024 (Submit Collection System Questionnaire on prior schedule in 2023)

TABLE 8.3. CONTACT INFORMATION FOR SPILL REPORTING

California Integrated Water Quality System (CIWQS)

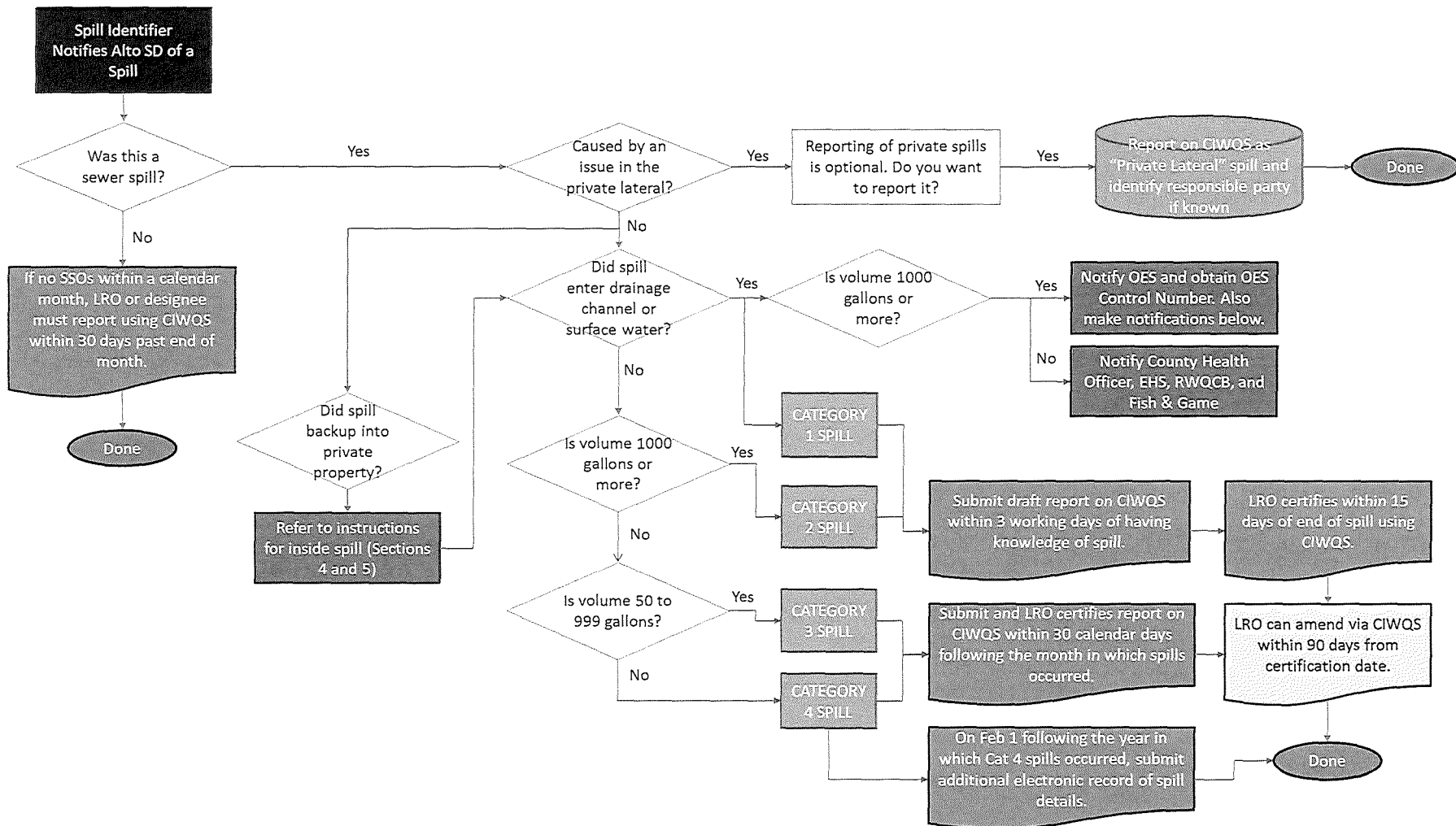
SWRCB REPORTING TIMEFRAMES DEPEND ON THE SIZE AND FINAL DESTINATION OF THE SPILL

- CIWQS must be used for reporting if the website is available (<http://ciwqs.waterboards.ca.gov>)
 - User Name: XXXX
 - Password: XXXX
 - Waste Discharge Identification Number (WDID): 2SSO10090
- The spill database will automatically generate an email notification with customized information about the spill upon initial reporting and final certification for all Category 1 spills.
- Emails must be sent to the EHS and the San Francisco Bay RWQCB.
- Fax the RWQCB if the website is down.

Two-Hour Notification

1. State Office of Emergency Services (OES)
 - Phone: (800) 852-7550. Make sure you ask for an “OES CONTROL NUMBER”
2. Marin County Environmental Health Services
 - Phone – Day: (415) 499-6907
 - Phone – Night: (415) 499-7235 (Sheriff’s Communication Center)
 - County Health Officer: (415) 473-3703
3. RWQCB Region 2 (San Francisco Bay)
 - Phone – Day: (510) 622-2300
 - Phone – Night: (510) 622-2369
 - Online: RB2SpillReports@waterboards.ca.gov

FIGURE 8.1 EXTERNAL REPORTING AND RESPONSE REQUIREMENTS



8.1 Multiple Appearance Points – Single Spill

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

8.2 2-Hour Notification to Regulatory Agencies of Spills

Cal OES is to be notified of a Category 1 spill 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. In addition, both the County Health Officer and EHS are to be contacted. During regular business hours, the Health Officer can be reached at (415) 473-3707 and the main EHS phone number to call is (415) 473-6907. During evenings/weekends, call the Sheriff Communication Center at (415) 479-2311.

The First Responder is responsible for reviewing field data for reporting to regulatory agencies. If it is determined that the criteria for OES notification was met, then the First Responder must notify OES of the event no later than two (2) hours after:

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

The OES phone number is (800) 852-7550.

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

8.3 Detailed Reporting Requirements

The following sections describe the detailed reporting requirements for each category of spill.

8.3.1 Spill Reporting for Category 1 Spills

The first responder will immediately notify the District Manager. The first responder will fill out the Field Report and turn it in to the Legally Responsible Official (LRO). The District Manager, or their designee, will meet with field crew(s) at the site of the spill event to assess the situation. In the event of a very large spill or a spill in a sensitive area, the District Manager will notify the Board of Directors.

8.3.1.1 Draft Spill Report

- Cal OES and EHS shall receive notification with 2 hours of having knowledge of any Category 1 spills greater than or equal to 1,000 gallons, as stated earlier in this section.
- The Data Submitter must then submit the initial draft report to the SWRCB's CIWQS Online spill database @ <http://ciwqs.waterboards.ca.gov/ciwqs> within 3 business days of becoming aware of the spill.

Table 8.4 on the following page lists information that is required in the draft spill report. The data provided in the draft spill must be supplemented further, during the certification process, as discussed further below

TABLE 8.4 CATEGORY 1 AND 2 CIWQS DRAFT SPILL REPORT – REQUIRED INFORMATION

Required Information for Category 1 and 2 Draft Spill Reports	
1.	Contact information: Name and telephone number of contact person to respond to spill-specific questions;
2.	Spill location name;
3.	Date and time the District was notified of, or self-discovered, the spill;
4.	Operator arrival time;
5.	Estimated spill start date and time;
6.	Date and time the District notified the California Office of Emergency Services, and the assigned control number;
7.	Description, photographs, and GPS coordinates of the system location where the spill originated;
8.	If a single spill event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the spill appearance point explanation field;
9.	Estimated total spill volume exiting the system;
10.	Description and photographs of the extent of the spill and spill boundaries;
11.	Did the spill reach a drainage conveyance system? If Yes: a. Description of the drainage conveyance system transporting the spill; b. Photographs of the drainage conveyance system entry location(s); c. Estimated spill volume fully recovered from the drainage conveyance system; d. Estimated spill volume remaining within the drainage conveyance system; e. Description and photographs of all discharge point(s) into the surface water;
** Items 12 and 13 are required for Category 1 spills only **	
12.	Estimated spill volume that discharged to surface waters; and
13.	Estimated total spill volume recovered.

8.3.1.2 Spill Certification for Category 1 Spills – 15 Calendar Days of the Spill End Date

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

The Certified Spill Report requires additional information to supplement the data provided in the Draft Spill Report. Table 8.5 on the following page summarizes information that is required during spill certification.

8.3.1.3 Spill Amendments for Category 1 Spills – 90 Calendar Days of the Spill End Date

The District shall update or add additional information to a Certified Spill Report within 90 calendar days of the spill end date by amending the report or by adding an attachment to the Spill Report in the online CIWQS Sanitary Sewer System Database. The Enrollee shall certify the amended report. After 90 calendar days, the District shall contact the State Water Board at SanitarySewer@waterboards.ca.gov to request to amend a Spill Report. The Legally Responsible Official shall submit justification for why the additional information was not reported within the Amended Spill Report due date.

8.3.2 Spill Reporting for Category 2 Spills

The first responder will fill out the Field Report and turn it in to the LRO.

8.3.2.1 Draft Spill Report – 3 Business Days of Becoming Aware of the Spill

Within 3 business days of becoming aware of the spill, the LRO must submit the initial report to the SWRCB's CWIQS Online Spill Database @ <http://ciwqs.waterboards.ca.gov/ciwqs>. The draft report shall include Items 1 through 11 of the list provided above for the Category 1, 3-day draft report.

8.3.2.2 Spill Certification for Category 2 Spills – 15 Calendar Days of the Spill End Date

Within 15 calendar days of the spill end date, the LRO must review and certify the report in the CWIQS Online Spill Database @ <http://ciwqs.waterboards.ca.gov/ciwqs>. The Spill Certification must include, in addition to the information provided in the draft report, Items 1 through 13 of the list provided above for the Category 1 Spill Certification. *In addition, the Spill Certification must include a new Item 14 - Whether or not the spill was located within 1,000 feet of a municipal surface water intake.*

TABLE 8.5 CATEGORY 1 AND 2 CIWQS SPILL CERTIFICATION – REQUIRED INFORMATION

Required Information for Category 1 and 2 Spill Certification	
1. Description of the spill event destination(s), including GPS coordinates if available, that represent the full spread and reach of the spill; 2. Spill end date and time; 3. Description of how the spill volume estimations were calculated, including at a minimum: a. The methodology, assumptions and type of data relied upon, such as supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered); and b. The methodology(ies), assumptions and type of data relied upon for estimations of the spill start time and the spill end time; 4. Spill cause(s) (for example, root intrusion, grease deposition, etc.); 5. System failure location (for example, main, lateral, pump station, etc.); 6. Description of the pipe material, and estimated age of the pipe material, at the failure location; 7. Description of the impact of the spill; 8. Whether or not the spill was associated with a storm event; 9. Description of spill response activities including description of immediate spill containment and cleanup efforts; 10. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the spill, and a schedule of major milestones for those steps; 11. Spill response completion date; 12. Detailed narrative of investigation and investigation findings of cause of spill; 13. Reasons for an ongoing investigation (as applicable) and the expected date of completion;	** Items 14 through 17 are required for Category 1 spills only ** 14. Name and type of receiving water body(s); 15. Description of the water body(s), including but not limited to: a. Observed impacts on aquatic life; b. Public closure, restricted public access, temporary restricted use, and/or posted health warnings due to spill; c. Responsible entity for closing/restricting use of water body; and d. Number of days closed/restricted as a result of the spill. 16. Whether or not the spill was located within 1,000 feet of a municipal surface water intake; and 17. If water quality samples were collected, identify sample locations and the parameters the water quality samples were analyzed for. If no samples were taken, "Not Applicable" shall be selected.

8.3.2.3 Amended Certified Spill Reports for Individual Category 2 Spills – 90 Calendar Days of the Spill End Date

The District shall update or add additional information to a Certified Spill Report within 90 calendar days of the spill end date by amending the report or by adding an attachment to the Spill Report in the online CIWQS Sanitary Sewer System Database. The LRO shall certify the amended report. After 90 calendar days, the District shall contact the State Water Board at SanitarySewer@waterboards.ca.gov to request to amend a Spill Report. The Legally Responsible Official shall submit justification for why the additional information was not reported within the Amended Spill Report due date.

8.3.3 Spill Reporting for Category 3 and 4 Spills

8.3.3.1 Monthly Spill Reporting for Category 3 Spills

Within 30 calendar days of the end of the calendar month in which the spill occurred, the LRO must submit and certify a report to the SWRCB's CWIQS Online Spill database @ <http://ciwqs.waterboards.ca.gov/ciwqs>. For each spill, the report shall include the information shown in Table 8.6.

TABLE 8.6 CATEGORY 3 CIWQS SPILL CERTIFICATION – REQUIRED INFORMATION

Required Information for Category 3 Spill Certification	
1.	Contact information: Name and telephone number of Enrollee contact person to respond to spill-specific questions;
2.	Spill location name;
3.	Date and time the Enrollee was notified of, or self-discovered, the spill;
4.	Operator arrival time;
5.	Estimated spill start date and time;
6.	Description, photographs, and GPS coordinates where the spill originated;
7.	If a single spill event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the spill appearance point explanation field;
8.	Estimated total spill volume exiting the system;
9.	Description and photographs of the extent of the spill and spill boundaries;
10.	Did the spill reach a drainage conveyance system? If Yes:
a.	Description of the drainage conveyance system transporting the spill;
b.	Photographs of the drainage conveyance system entry locations(s);
c.	Estimated spill volume fully recovered from the drainage conveyance system; and
d.	Estimated spill volume discharged to a groundwater infiltration basis or facility, if applicable.

Required Information for Category 3 Spill Certification

11. Estimated total spill volume recovered;
12. Description of the spill event destination(s), including GPS coordinates, if available, that represent the full spread and reaches of the spill;
13. Spill end date and time;
14. Description of how the spill volume estimations were calculated, including, at minimum:
 - a. The methodology and type of data relied upon, including supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered); and
 - b. The methodology and type of data relied upon to estimate the spill start time, on-going spill rate at time of arrival (if applicable), and the spill end time.
15. Spill cause(s) (for example, root intrusion, grease deposition, etc.);
16. System failure location (for example, main, pump station, etc.);
17. Description of the pipe/infrastructure material, and estimated age of the pipe/infrastructure material, at the failure location;
18. Description of the impact of the spill;
19. Whether or not the spill was associated with a storm event;
20. Description of spill response activities including description of immediate spill containment and cleanup efforts;
21. Description of spill corrective actions, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the spill, and a schedule of the major milestones for those steps; including, at minimum:
 - a. Local regulatory enforcement action taken against an illicit discharge in response to this spill, as applicable, and
 - b. Identifiable system modifications, and operation and maintenance program modifications needed to prevent repeated spill occurrences at the same spill event location, including:
 - i. Adjusted schedule/method of preventive maintenance;
 - ii. Planned rehabilitation or replacement of sanitary sewer asset;
 - iii. Inspected, repaired asset(s), or replaced defective asset(s);
 - iv. Capital improvements;
 - v. Documentation verifying immediately implemented system modifications and operating/maintenance modifications;
 - vi. Description of spill response activities;
 - vii. Spill response completion date; and
 - viii. Ongoing investigation efforts, and expected completion date of investigation to determine the full cause of spill.
22. Detailed narrative of investigation and investigation findings of cause of spill.

8.3.3.2 Amended Certified Spill Reports for Individual Category 3 Spills – 90 Calendar Days of the Spill End Date

The District shall update or add additional information to a Certified Spill Report within 90 calendar days of the spill end date by amending the report or by adding an attachment to the Spill Report in the online CIWQS Sanitary Sewer System Database. The LRO shall certify the amended report. After 90 calendar days, the District shall contact the State Water Board at SanitarySewer@waterboards.ca.gov to request to amend a Spill Report. The Legally Responsible Official shall submit justification for why the additional information was not reported within the Amended Spill Report due date.

8.3.3.3 Monthly Spill Reporting for Category 4 Spills

Within 30 calendar days of the end of the calendar month in which the spill occurred, the LRO must submit and certify the estimated total spill volume exiting the sanitary sewer system and the total number of all Category 4 spills to the SWRCB's CWIQS Online spill database @ <http://ciwqs.waterboards.ca.gov/ciwqs>.

8.3.3.4 Annual Spill Reporting for Category 4 Spills

Upload and certify a report, in an acceptable digital format, of all Category 4 spills to the online CIWQS Sanitary Sewer System Database, by February 1st after the end of the calendar year in which the spills occur.

8.3.4 No Spill Certification (Monthly)

If no spills occur during a calendar month, the LRO shall certify, within 30 calendar days after the end of each calendar month, a “No-Spill” certification statement in the online CIWQS Sanitary Sewer System Database, certifying that there were no spills in the designated month.

If a spill starts in one calendar month and ends in a subsequent calendar month, and the District has no further spills of any category, in the subsequent calendar month, the LRO shall certify “no-spills” for the subsequent calendar month. If the District has no spills from its systems during a calendar month, but the District voluntarily reported a spill from a private lateral or a private system, the LRO shall certify “no-spills” for that calendar month.

8.3.5 CIWQS Not Available

In the event that the CIWQS online spill database is not available, the LRO will fax or e-mail all required information to the RWQCB office at (510) 622-2460 in accordance with the time schedules identified above. In such an event, the District will submit the appropriate reports using the CIWQS online spill 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 spill document file.

8.3.6 Amending Spill Reports

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

State Board: SanitarySewer@waterboards.ca.gov

Walter Mobley
State Water Resources Control Board
Division of Water Quality
1001 I Street 15th Floor
Sacramento, CA 95814
E-mail: Walter.Mobley@waterboards.ca.gov
Phone: (916) 323-0878

9 EQUIPMENT INVENTORY

The emergency response contractor maintains a stock of emergency response equipment which is available if needed for spill response. The District does not maintain specialized equipment to support spill response.

SASM maintains water quality sampling kits for the District that include:

- Sterile plastic bottles, 125 mL and 250 mL
- Laboratory requisition forms
- Styrofoam container, ice chest, or equivalent
- Blue ice packs, frozen
- Waterproof marker and ballpoint pen
- Labels for collection bottles
- Towel for drying bottles
- Sampling pole for collecting samples
- Rubber boots and/or rubberized waders

These supplies meet EHS standards for proper water quality sampling.

10 TRAINING

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

10.1 Employees and Contractor Employees

10.1.1 Initial and Annual Refresher Training

All District personnel and contractor employees who may have a role in responding to, reporting, and/or mitigating a sewer system spill should receive training on the contents of this Spill Emergency Response Plan. All new employees should receive training before they are placed in a position where they may have to respond. Current employees should receive annual refresher training on this plan and the procedures to be followed.

Affected employees will receive annual training on the following topics, at a minimum, by knowledgeable trainers:

- The District's Spill Emergency Response Plan
- Spill Volume Estimation Techniques
- Impacted Surface Waters: Response Procedures

10.1.2 Spill Response Drills

Periodic training drills should be held to ensure that employees are up to date on these procedures, equipment is in working order, and the required materials are readily available. The training drills will cover scenarios typically observed during sewer related emergencies. The results and the observations during the drills will be recorded and action items should be tracked to ensure completion.

10.1.3 Spill Training Record Keeping

The District Manager keeps records of all training that is provided in support of this plan. The records for all scheduled training courses and for each spill emergency response training event should include date, time, place, content, name of trainer(s), and names of attendees.

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