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SSO Emergency Response Plan Description

May 2023

Introduction:

This SSOERP follows the Statewide Waste Discharge Requirements (WDR). After the State WDR was adopted on May 2, 2006, OC SAN updated its existing SSMP from the prior Santa Ana Regional Water Board WDR in order to meet its new requirements. OC SAN currently has an effective SSO response program with extensive notification procedures.

Volume 1 of the final SSMP summarizes how OC SAN complies with the WDR or Monitoring and Reporting Program (M&RP). Volume 2 of the final SSMP contains specific support documents referenced in Volume 1 needed for quick access by staff or auditors.

Our goal is to develop user-friendly documents for staff use, regulator use, and public review as required by the WDR order. This SSOERP also becomes a part of OC SAN's Integrated Emergency Response Plan (IERP) for major local or regional disasters.

OC SAN has reviewed and updated its existing SSOERP. The SSOERP is illustrated in the "OC SAN SSO Response Flow Chart" Appendix P1 provides a step-by-step description of the OC SAN SSO emergency response procedures. The flow chart is also designed to be used as a decision tool for responding to different types of events in gravity sewers, force mains, and pump stations. Where appropriate, more detailed flow charts, procedures, and other referenced documents will be used as supplemental data based on staff input and professional judgment.

OC SAN SSOERP action items are as follows:

(i) Description of Organization:

(A) Administrative, Operations and Maintenance and Lines of Authority:

OC SAN currently maintains organization charts that provide this information. Much of this general information is available for review in our annual budget book. In addition, an SSMP program organizational chart is maintained.

The Collection Facilities O&M Division staff have the lead role in SSO response activities and retain current versions of SOPs for SSO Response and Spill Containment. Other agency staff and contractors assist them as necessary.

(B) Chain of Communication for Reporting SSOs:

The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the RWQCB, the

Orange County Health Care Agency (OCHCA), Orange County Public Works, and the State Office of Emergency Services (OES) are contained in Appendix P, Volume 2. These include the SSO Response flowchart that describes the OC SAN Control Center and Collection System staff procedures for reporting SSOs and response and notification procedures.

(ii) Overflow Emergency Response Plan (ERP)

OC SAN has developed and implemented an overflow emergency response plan that identifies measures to protect public health and the environment and includes, at a minimum, the following:

- (A) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner.

The OC SAN SSO response flow chart illustrates the established procedures that are followed when a problem is reported. The plan provides the following:

- Reporting of a problem from internal and external sources
- Actions taken during regular (6:00 a.m. to 4:30 p.m., Monday thru Thursday) and after regular OC SAN business hours
- Staff or primary standby mobilization by the duty Operations Supervisor or designee.

- (B) A program to ensure an appropriate response to all overflows.

As shown in the OC SAN SSO response flow chart, OC SAN staff responds to all reported problems, including those SSOs that do not discharge to the waters of the State. OC SAN has a formal process to evaluate the jurisdictional responsibility and the cause of the problem. This also includes a process in the event the reported event cannot be located in the field. Once located, the following sequence occurs as outlined in the flow chart:

- Attempt containment using spill containment procedures.
- If the SSO is OC SAN's responsibility, initiate the spill notification process.
- Control the SSO and eliminate the problem
- Recovery and clean-up
- Field documentation
- If the SSO is not OC SAN's responsibility, the notification process includes notification of the responsible party, site assistance when requested, and field documentation of the event.

- (C) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g., health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with the MRP, the California Water Code, other State Laws, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification.

As shown in the OC SAN SSO response plan flow chart, when a problem is reported, the Control Center dispatcher notifies OC SAN staff in accordance with established procedures. The chain of communication for reporting is then implemented, beginning with a possible spill notification and communicating with those on the spill notification distribution list. OC SAN staff responds and investigates, while the notification of SSOs procedure provides notification processes for the following:

- Events that occur during regular (6:00 a.m. to 4:30 p.m., Monday thru Thursday) and after regular business
- Non-OC SAN service area events
- Internal notification for support from the OC SAN Environmental Compliance (EC) division
- OC SAN laboratory staff or other appropriate OC SAN divisions
- Evaluation on a case-by-case basis to initiate monitoring, reporting, and additional control and elimination procedures as necessary.

(D) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained.

OC SAN has an existing formal training program for OC SAN staff that requires mandatory safety training, technical skills training, and supervisory/management skills training. The program also uses California Water Environment Association (CWEA) certification and on-the-job training (OJT) as part of this program. The current program is being supplemented with a multiyear focused training and validation program.

OC SAN uses an on-site SSO simulator that allows crews to practice SSO response, containment procedures and estimate overflow volume using metered discharges from a manhole and cover. Documented SOPs are being developed for this purpose. Contract specifications for Capital Improvement Projects (CIP) require that contractors develop their own SSOERPs.

(E) Procedures to address emergency operations, such as traffic, crowd control, and other necessary response activities.

OC SAN has existing traffic and safety control procedures that comply with Caltrans and CalOSHA requirements. These include:

- Adherence to Work Area Traffic Control Handbook (WATCH) procedures
- Use of confined space entry/rescue certified personnel as necessary
- Use of personal protective equipment
- Site Security
- Use of law enforcement agencies as necessary for site-specific needs. Events requiring law enforcement assistance are evaluated on a case-by-case basis.
- Contractors are used to supplement agency staff as necessary.

(F) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters

of the US and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and effects of the discharge.

The OC SAN SSO response flow chart has steps identified that are specific to:

- Containment
- Control and elimination of the SSO
- Clean-up
- Failure analysis and debriefing

Standard procedures and materials have been developed for the specific steps in the flow chart and are available in OC SAN vehicles. Equipment is also available to assist in containment, control, elimination, and clean-up.

Events are evaluated on a case-by-case basis. The need for monitoring is determined based on the possible impact on recreational waters and in coordination with RWQCB and OCHCA staff. OCHCA or the RWQCB has responsibility for sampling. OC SAN may provide assistance with sampling if requested.

OC SAN staff worked with the County of Orange to develop a plan for containing and recovering SSOs to surface waters, storm drains, and channels. This may include hiring an on-call contractor to assist in recovering SSOs that have reached storm drains or channels. OC Public Works manages and executes the Countywide Area Spill Control (CASC) Program.

The OC SAN Control Center is staffed with dispatchers 24 hours a day, seven days a week. OC SAN has an on-call list with a primary contact. An assigned secondary staff person is contacted and dispatched if the primary contact cannot be dispatched. On-call staff is authorized to mobilize additional staff and equipment as needed. A response time of one hour or less is an established goal and measured performance metric. OC SAN has adequate staff and equipment to respond to historic normal service requests, including SSOs. Suppose additional resources are needed for extraordinary events. In that case, OC SAN maintains a contact list of contractors and suppliers and has standing blanket purchase orders to mobilize the additional resources rapidly and specific to the event, whether it is a gravity sewer or pump station problem.

OC SAN contractors are provided the Master Spec 02999 Temporary Handling of Sewage Flow. This document provides guidance and contains language on responding to sewage spills at the project work site. The document requires contractors, as needed, to develop a Spill Prevention, Control, and Countermeasure Plan, which includes spill notification, response, containment, and reporting protocols in the event an SSO occurs.