



## vi. Overflow Emergency Response Plan

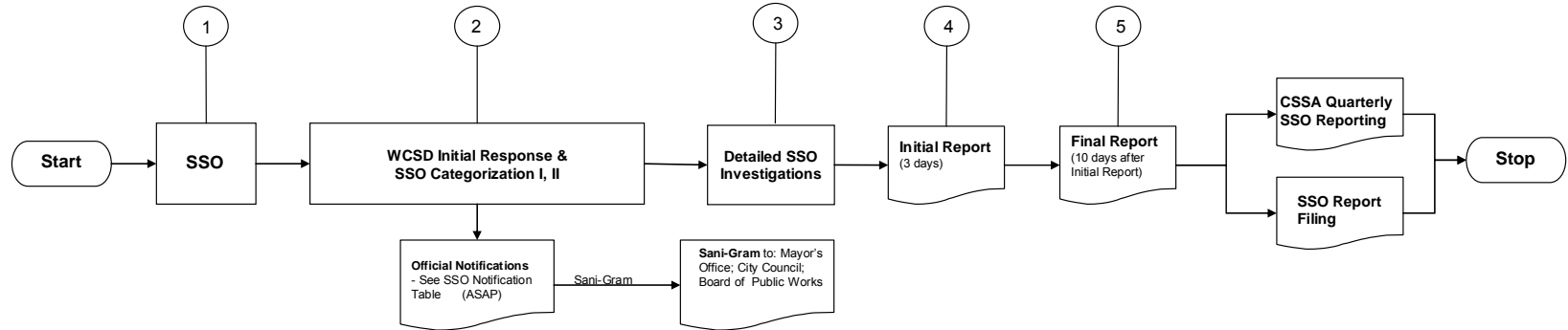
**Overflow Emergency Response Plan:** Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

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

The Bureau of Sanitation's Wastewater Collection Systems Division maintains an up-to-date Sanitary Sewer Overflow Response and Reporting Procedures. City staff meets all permit and regulatory requirements by following these procedures. The City encourages citizens to report overflows to the Bureau of Sanitation. Citizens may use the toll free telephone number "311" to report overflows and other sewer problems. Staff is available 24 hours per day, seven days per week to receive calls. The appropriate phone numbers are listed in local phone directories and posted on the Bureau's web sites. All calls are automatically forwarded to the Venice Pump Station to ensure that none are missed. Once verified, all sewer overflows regardless of volume or potential impact are reported to all parties in the chain of communication within the City and to the appropriate regulatory agencies, as shown in Figure 6-1. When an overflow is due to private construction activities, the construction contractors and City inspectors are required to report the overflow to the Bureau of Sanitation immediately.

All sewer overflows that enter the waters of the state such as ocean and waterways must be reported immediately. For the purposes of reporting to the Health Officer, the term immediate is defined as within 15 minutes of the knowledge of an overflow event. Immediate reporting is made when an overflow results in a direct discharge into the waters of the State and/or when the Bureau of Sanitation's Wastewater Collection Systems Division's personnel determine that an overflow could potentially reach the waters of the State based on their knowledge of the sewer and storm drain infrastructure. All other overflows must be reported to the Health Officer and the RWQCB within two hours of the knowledge of overflow event. In addition, other agencies must be notified a list of which is included in the Wastewater Collection Systems Division's Sanitary Sewer Overflow Response and Reporting Procedures, Latest Edition.

**Figure 6-1**  
**Sanitary Sewer Overflow (SSO) Reporting and Response Cycle**



1. **SSO Occurs** Reported by a private individual to City departments: LAFD, LAPD, 311, BOS, etc. Report of SSOs is relayed to WCSD in BOS. Specific response procedures are set up for after hour SSO reporting.
2. **WCSD Initial Response**
  - a) Dispatches response crews, identify possible causes and initiate the appropriate corrective measures to contain, clean up and repair the SSO.
  - b) Categorize SSO into Categories I-II based on discharge amount, water body impacted, and drainage/storm system affected responsible parties. (Category I: SSOs equal or exceed 1,000 gallons; or result in a discharge to a drainage channel and/or surface water; or discharge to a storm drainpipe that was not fully captured and returned to the sanitary sewer system. Category II: All other discharges of sewage resulting from a failure in the City of Los Angeles sanitary sewer system)
  - c) Makes official telephone notifications to LACDHS, RWQCB, WRB, OES, and other departments depends on category.
  - d) Identify schools in immediate vicinity of the SSO, inform the district supervisor, post community warning signs and barricades, perform necessary clean up, take SSO samples for laboratory analysis.
  - e) Informs BOS director or executive in charge.
  - f) E-mails preliminary SSO notice to BOS executive.
3. **Detailed SSO Investigations And Field Response**
  - a) Document initial observations, take pictures and CCTV recordings of SSO, analyze and estimate SSO volume, QA/QC of SSO response.
  - b) Immediate repair conducted by on-call BOE contractor.
  - c) Sani-Gram issued by BOS Executive upon more accurate assessment of SSO.
4. **Initial Report**
  - a) Initial report of the SSO shall be completed within 3 days of the SSO incident, entered into CIWQS (California Integrated Water Quality System) database.
  - b) Initial report of the SSO shall be submitted within 5 days of the SSO incident to Los Angeles Regional Water Quality Control Board (LARWQCB).
  - c) Initial report shall include information such as: date and time, location, duration, causes, nature and volume, sewer conditions, type of remedial/cleanup measure, corrective/preventive actions taken, water body impacted, date and time of notifications for regulatory agencies.
5. **Final Report**
  - a) Final report of the SSO shall be completed within 10 days of submission of the Initial Report.
  - b) CSSA Quarterly SSO Reporting and filing need to be conducted periodically within BOS.

Sani-Gram Distribution List (BOS Executives)			
TO:		CC:	
President of Board of Public Works	All Council Members	Heal the Bay	All Bureau Division Heads
Vice President of Board of Public Works	Mayor's Office	Environmental Monitoring Division	Baykeeper
President Pro-Tempore of Board of Public Works	Public Affairs Office	L. A. County Public Works	Pacific Palisades Community Council
Commissioners of Board of Public Works	City Engineers, Deputy City Engineer	Community Council	Santa Monica Canyon Civic Association
Secretary of Board of Public Works	City Attorney's Office	All Bureau Assistant Directors	Surfrider
		Los Angeles County, Public Health Department	

SSO Notification Table (WCSD)		
SSO Category	I	II
District Supervisor, Manager I, II, III	√	√
Los Angeles Unified School District (LAUSD)	√	√
Department of Health Services (DHS), County of Los Angeles Health Department (CLAHD)	√	√
Los Angeles Regional Water Quality Control Board (LARWQCB)	√	√
State Office of Emergency Services (SOES)	√	
Environmental Protection Agency (EPA) Region 9	√	
Board of Public Works (BPW), Mayor's Office, Council Offices (as directed by BOS Executive Management)	√	
Heal the Bay (notified when beach advisory or closure occurs)	√	
American Oceans Campaign (AOC) (notified when beach advisory or closure occurs)	√	
Board of Public Works Public Affairs Office (notified when beach advisory or closure occurs)	√	
California State Department of Fish and Game (notified when SSO reaches receiving waters)	√	
Watershed Protection Division (WPD, notified when SSO reaches City of Los Angeles storm drain)	√	
Los Angeles County Department of Public Works, Information Technology Division (notified when SSO reaches Los Angeles County drainage and/or storm drain system)	√	
Environmental Monitoring Division (EMD, notified when SSO reaches receiving waters)	√	√
Department of Water and Power (DWP), Water Control Office (WCO) (notified when SSO would impact shallow groundwater)	√	
Human Resource Development Division (HRDD, notified when requiring coordination of multi-agency response and upon approval from the Division Manager)	√	√
Los Angeles County, Department of Beaches and Harbor	√	√
Issue Sani-Gram to Distribution List	√	√

**(b) A program to ensure an appropriate response to all overflows;**

The City's emergency response procedures require full, immediate, and appropriate attention and response to a sanitary sewer overflow with the ultimate goal of minimizing impacts to public health and safety and the environment. It is the City policy that "Every reported sewage spill affecting public or private property within the City of Los Angeles shall be acted upon by the Division." Telephone calls to report overflows or other maintenance problems are answered 24 hours per day, 7 days per week. Crew leaders are immediately notified upon receipt of a reported potential sewer overflow and are instructed to respond immediately. Written procedures are provided for assessing the overflow, notifying supervisors, documenting the overflow, estimating the volume of the overflow, sampling and laboratory analysis, posting warning signs and following up. The highest priorities are to contain the overflow and minimize, if not prevent the overflow from reaching the storm drain system, and to minimize or eliminate exposure to the public and impact on public health. The City's procedures are designed to protect public health and safety, meet all regulatory reporting requirements, and ensure immediate and effective response.

Construction contractors are required to have an approved sewage flow bypass system and Emergency Response Plan in place prior to start of construction. Contractors are instructed to take immediate action to stop any overflow. These are discussed at the pre-construction conference and enforced by the Bureau of Contract Administration.

**(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 this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification;**

The City's Sanitary Sewer Overflow Response and Reporting Procedures outlines notification steps and includes a comprehensive contact and notification list. Notification depends on the severity and potential impact of the overflow. All sewer overflows that enter the waters of the state such as ocean and waterways must be reported immediately. For the purposes of reporting to the Health Officer, the term immediate is defined as within 15 minutes of the knowledge of an overflow event. Immediate reporting is made when an overflow results in a direct discharge into the waters of the State and/or when the Bureau of Sanitation's Wastewater Collection Systems Division's personnel determine that an overflow could potentially reach the waters of the State based on their knowledge of the sewer and storm drain infrastructure. All other overflows must be reported to the Health Officer and the RWQCB within two hours of knowledge of overflow event. In addition, immediate notification of the public, health agencies, and others of overflows "that may imminently and substantially endanger human health" is required. Initial notification includes posting warning signs and barricades as necessary by the responding crews. Appropriate agencies and impacted entities are notified in accordance with City procedures. The notification lists are updated to keep officials names and positions current. Construction contractors are required to take immediate measures to mitigate and report overflows as soon as they are discovered. The Department of Public Works' Bureau of Contract Administration inspectors report construction-related overflows to the Bureau of Sanitation and document the time,

location, cause, estimated quantity, and any impact of the overflow, and take mitigation measures as needed.

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

The emergency response plan is clearly documented and available to all personnel. It is used as a resource in the emergency response training. All wastewater operation and maintenance staff are trained on emergency response procedures at least annually. New employees receive this training as part of their orientation and this training is reinforced during tailgate training sessions. Construction inspectors are also trained in emergency response procedures. The City emphasizes its goal to have no construction-related overflows during pre-bid and pre-construction meetings. Construction contractors are required to submit and obtain approval of all flow bypasses and emergency response plans prior to the start of construction.

**(e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities;**

The City has developed and implemented an advanced and comprehensive overflow prevention, response and reporting program. These include timely reporting to the impacted agencies and stakeholders, computer templates for estimating overflow volume, training for overflow review committee, and follow-up CCTV inspection to accurately determine cause and prevention methods.

Adequate staff is placed on standby status to supplement existing staff as needed or respond to an emergency after hours. The City maintains a list of pre-qualified on-call contractors who provide specific equipment, materials, and crews to the City in emergency operations. Operation Staff at the Venice Pump Station constantly monitor the status of the remote pump stations and are authorized to dispatch standby personnel as necessary. In addition, the City's Police Department, Fire Department, and Department of Transportation can be utilized to assist in emergency situations. The Bureau of Sanitation conducts table top exercises to simulate a multi-agency response to major sewer emergency.

**(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 United States 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 impact of the discharge.**

The City seeks to protect public health & safety and the environment through the implementation of all Federal and State laws, standards, and orders applicable to untreated wastewater. Through a comprehensive and systematic program of cleaning, condition assessment, repair, and upgrade of its sewer system, the City controls the discharge of untreated and partially treated wastewater into receiving waters such as ground water, streams, and rivers.

When an overflow occurs, the highest priorities are to contain the overflow and minimize, if not prevent, the overflow discharge into the storm drain system, and to minimize or eliminate exposure to the public and impact on public health. The Wastewater Collection Systems

Division's Sanitary Sewer Overflow Response and Reporting Procedures provide guidance to the crews in order to accomplish this objective.

A comprehensive investigation is performed for each overflow event to diagnose cause and take remedial measures to prevent and mitigate similar future events.

Furthermore, the City has ongoing public outreach and education programs on untreated or partially treated wastewater, its health risk and impact to the receiving waters.

### ***References***

Bureau of Sanitation, Wastewater Collection Systems Division, Sanitary Sewer Overflow Response and Reporting Procedures, Latest Edition

Bureaus of Engineering, Contract Administration and Sanitation; "Joint Statement of Policy Pertaining to the Prevention of and Response to Construction Contract-Related Sewage Overflows."