



Sewer System Management Plan

Originally Approved October 2009
Administratively Updated and Re-Certified in 2015 and July 2022

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Table of Contents

<i>INTRODUCTION</i>	1
Legal Requirements.....	1
Sewer System Management Plan Requirements	1
<i>SSMP ELEMENTS</i>	2
Goals	2
Organization	3
Figure 1: Wastewater Division Organizational Chart.....	4
Figure 2: SSO Response and Reporting.....	6
Operation and Maintenance Program.....	9
Design and Performance Provisions.....	12
Overflow Emergency Response Plan	13
Fats, Oils, and Grease Control Program.....	16
System Evaluation and Capacity Assurance Plan	19
Monitoring, Measurement, and Program Modifications.....	20
Program Audits.....	21
Communication Program	21

Figures

Figure 1: Wastewater Division Organizational Chart.....	4
Figure 2: SSO Response and Reporting.....	6

Tables

Table 1: Implementation Responsibility.....	5
Table 2: Paso Robles Wastewater Collection System Capital Improvements Plan.....	20

INTRODUCTION

Legal Requirements

On May 2, 2006, the State Water Resources Control Board (SWRCB) enacted Order No. 2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). The WDR requires any public agency that owns or operates a sanitary sewer system (hereafter “sewer system” or “collection system”) more than one mile in length that conveys treated or partially treated wastewater to a Publicly Owned Treatment Works (POTW) in the State of California, comply with the requirements of the WDR in order to reduce the number of Sanitary Sewer Overflows (SSOs).

Under this WDR, agencies must electronically report SSOs to the State Water Resources Control Board and develop a Sewer System Management Plan (SSMP) which describes how each agency operates, maintains, and evaluates its sewer system.

The City of Paso Robles (City) owns and operates 126 miles of sewers and 13 lift stations which provide service to approximately 31,000 people. Sewage is conveyed to a wastewater treatment plant at the north end of the City, adjacent to the Salinas River.

Sewer System Management Plan Requirements

The City submitted a Notice of Intent for coverage under the WDR and has developed this SSMP per the requirements of the WDR. This SSMP identifies how the City complies or implements the following WDR elements:

1. Goal
2. Organization
3. Legal Authority
4. Operation and Maintenance Program
5. Design and Performance Provisions
6. Overflow Emergency Response Plan
7. FOG Control Program
8. System Evaluation and Capacity Assurance Plan
9. Monitoring, Measurement, and Program Modifications
10. SSMP Program Audits
11. Communication Program

The City currently implements a variety of programs that meet the WDR objectives and are consistent with the specific requirements of the SSMP. The sections of this SSMP are organized to correspond with the 11 elements listed above. The SSMP integrates many ongoing City activities into one formal document. Some of these activities are described in greater detail in other documents that are referenced in the SSMP. The applicable documents are kept at the Wastewater Treatment Plant. This SSMP is available to the public at:

<http://www.prcity.com/government/departments/publicworks/wastewater/index.asp>

SSMP ELEMENTS

Goals

WDR Requirement: The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

The City Council adopted the following SSMP goals by resolution in October 2007:

1. Decrease the occurrence of reportable SSOs by one-third (1/3) from pre-SSMP levels. City staff met this goal by October 2011.
2. Prevent public health hazards through proper notification, emergency response and spill containment and clean up procedures.
3. Minimize inconveniences by responsibly handling interruptions in service.
4. Protect the City's large investment in sewer systems by maintaining adequate capacities and extending useful life.
5. Prevent unnecessary damage to public and private property by coordinating with property owners, business operators, contractors, and other parties utilizing the City's sewer system.
6. Use available funds for sewer operations in the most efficient manner. Identify, prioritize, and renew and replace sewer system facilities according to the approved Capital Improvement and Integrated Water Resources Plans.
7. Convey wastewater to treatment facilities with minimum infiltration, inflow and exfiltration.
8. Provide adequate capacity within the sewer system, including peak flows, through review of development plans and other associated plans which may affect the City's sewer system capacity.
9. Perform operations in a safe manner to avoid personal injury or property damage.
10. Be available and responsive to the needs of the public, and work cooperatively with local, state, and federal agencies to reduce, mitigate and properly report SSOs.
11. Implement regular scheduled maintenance of the sewer system to remove roots, debris, sand, and Fats, Oils and Greases (FOG) in areas prone to blockages that may cause SSOs or sewer backups.

Organization

WDR Requirement: The SSMP must identify:

- (a) The name of the responsible or authorized representative as described in Section J of the WDR.
- (b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and
- (c) The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

The Wastewater Division which is part of the City Utilities Department, is responsible for administration and implementation of the SSMP. The Division includes Industrial Waste, Wastewater Plant Operations and Collections. The Collection Operators are responsible for the daily maintenance and response to SSOs. Figure 1 shows the organization of the Division.

- (a) ***The name of the responsible or authorized representative as described in Section J of the WDR.***

The authorized representative or Legally Responsible Official (LRO) for the implementation and administration of the City's SSMP and for completing and certifying spill reports electronically is Jared Pickens, Collections Supervisor (Supervisor).

- (b) ***The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and***

Figure 1 is the organization chart for the Wastewater Division. Table 1 lists the responsible person for implementing the specific measures in the SSMP program.

- (c) ***The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).***

Figure 2 shows the City's chain of communication and responsible staff for receiving reports, responding to SSOs, notifying the proper authorities and for reporting and certifying the spills electronically.

Figure 1: Wastewater Division Organizational Chart

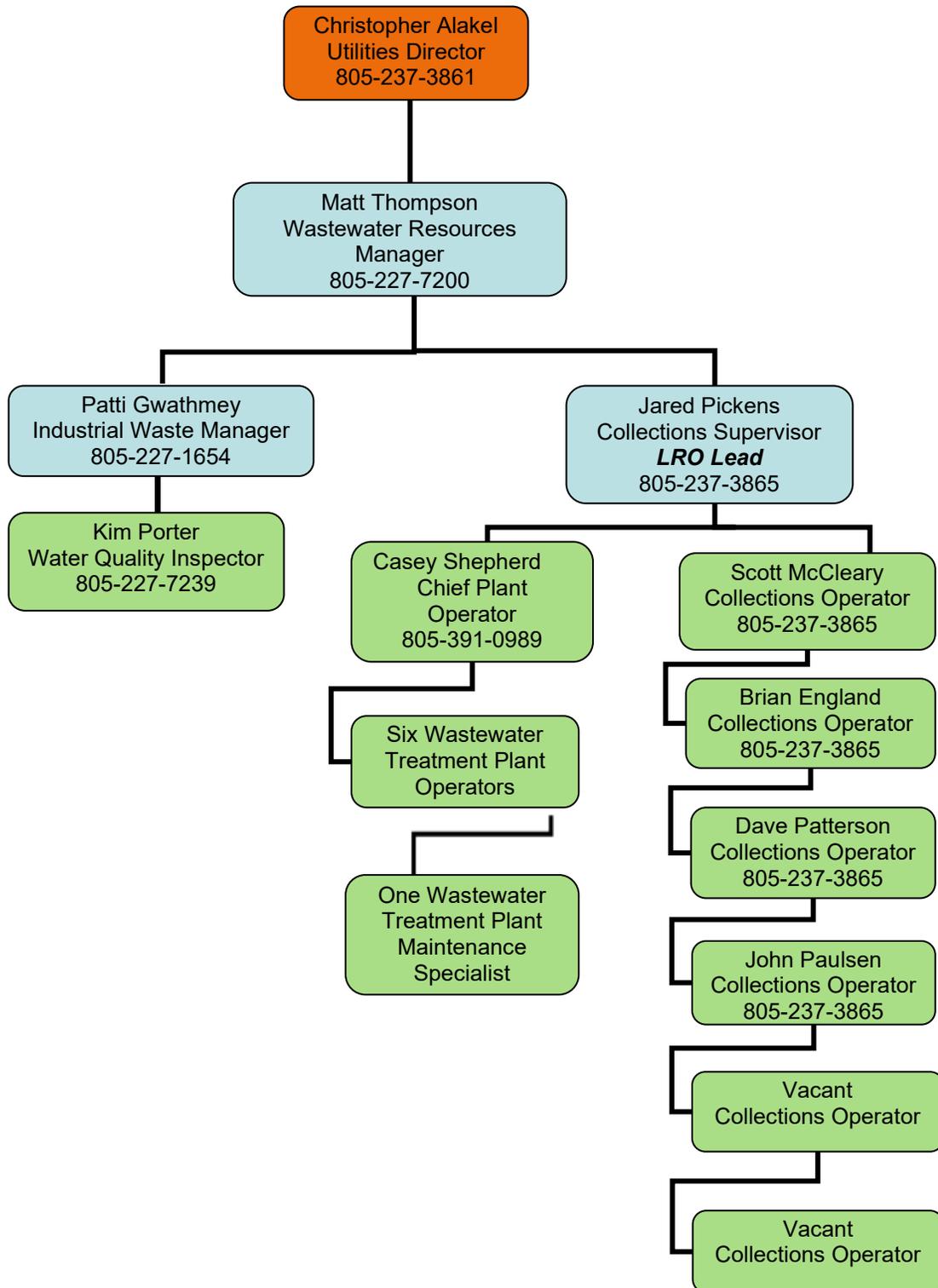


Table 1: Implementation Responsibility

Element	Responsible Person(s)
Goals	The Utilities Director and Wastewater Resources Manager are responsible for developing the goals of the Wastewater Division and this SSMP.
Organization	The Wastewater Resources Manager is responsible for updating the organizational structure, SSMP implementation assignments, and chain of communication, as needed.
Legal Authority	Wastewater Resources Manager, Industrial Waste Manager
Operations and Maintenance Program	Wastewater Collections Supervisor
FOG Control Program	The Collections Supervisor is responsible for identifying grease hot spots, maintaining an effective cleaning program for grease problem sewers. The Water Quality Inspector is responsible for inspecting grease traps/interceptors that have been installed and for enforcing discharge regulations, as needed.
Overflow Emergency Response Plan	The Collections Supervisor is responsible for implementation of the Overflow Emergency Response Plan, including revisions to the plan and annual trainings for maintenance staff.
Design and Performance Provisions	The Wastewater Resources Manager, Collections Supervisor and the Capital Projects Engineer are responsible for reviewing design and construction documents to ensure that all construction projects meet the City standards. The City Engineer is responsible for updating standards for installation, rehabilitation, and repair, as needed. The Collections Supervisor or his designees are responsible for the inspection of construction projects to ensure City standards have been followed.
System Evaluation and Capacity Assurance Plan	Wastewater Resources Manager, Wastewater Supervisor
Monitoring, Measurement and Program Modifications	Wastewater Resources Manager, Collections Supervisor
SSMP Audits	Wastewater Resources Manager
Communication Program	Wastewater Resources Manager, Collections Supervisor

Legal Authority

WDR Requirement: Each Enrollee must demonstrate, through sanitary sewer system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- (a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, storm water, chemical dumping, unauthorized debris and cut roots, etc.);
- (b) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
- (c) Limit the discharge of fats, oils, and grease and other debris that may cause blockages; and
- (d) Enforce any violation of its sewer ordinances.

The City's sewer use ordinance provides City staff with authority to enforce all of the above. Chapter 14.08, Sewerage System Operations, addresses construction of sewers, connection to City sewers, prohibitions, and limitations on discharges to the sewer system. Chapter 14.10 addresses discharges of industrial waste. The local limits in Chapter 14.10 are to protect the longevity of the City's sewer system, as well as prevent pass-through and interference by pollutants at the wastewater treatment plant.

- a) ***Prevent illicit discharges into its sanitary sewer system (examples may include I/I, storm water, chemical dumping, unauthorized debris and cut roots, etc.)***

The City's sewer use ordinance sets limitations and prohibitions on wastewater discharges to protect the collection system, workers and treatment plant.

The City implements an Industrial Waste Program, to control certain commercial and industrial facility dischargers that have the potential to have an adverse effect the collection system or the wastewater treatment plant.

The City uses Closed Circuit Television (CCTV) to inspect City sewer mains after routine cleaning. During the inspections the lines are graded. Lines that have inflow/infiltration (I/I), exhibit high flow, or operational failure are identified. Lines that have problems that may cause a blockage or SSO are placed on a High Maintenance Areas (HMA) list. Sewer system sections on the HMA list receive frequent cleaning or maintenance so as to prevent SSOs.

- (b) **Require that sewers and connections be properly designed and constructed**

The City's sewer use ordinance.

1. States that "no person shall uncover, make any connections with or opening into, use, alter or disturb and public sewer or appurtenance, or perform any

work on any plumbing or drainage system with the City's public right-of-way, without first obtaining a written permit from the City."

2. Outlines the requirements for the construction of and connection to the City sewer.

See Design and Performance Provisions below.

(c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency.

The City does not maintain private lateral sewer lines. The City's sewer use ordinance states "Building sewers shall be maintained by the owner of the property served thereby." City easements are in place where City owned sewer appurtenances are located on private property to ensure that City staff can perform the necessary maintenance, inspection, and repairs.

(d) Limit the discharge of FOG and other debris that may cause blockages.

The City began implementing a Fats, Oils, and Grease (FOG) Program in June 2008. The program consists of annual inspections to ensure that grease removal devices are installed, properly maintained, and that waste FOG is properly disposed of.

The City's sewer use ordinance:

1. Limits discharges to 100 mg/L Oil and Grease.
2. Provides City the authority to supplement the ordinance with more stringent limitations and prohibitions if necessary.
3. Requires grease interceptors be installed at food service establishments. Grease interceptors must be sized and installed per the California Plumbing Code.
4. Provides City staff authority to require property owners to install upgraded equipment if the existing removal device does not adequately remove FOG.

(e) Enforce any violation of its sewer ordinances.

The City's sewer use ordinance:

1. Outlines penalties for not connecting to the City sewage facilities in the manners provided in the City Code.
2. Gives the Director of Public Works the authority to administer, implement, and enforce policies and standards necessary to protect the City facilities. Enforcement procedures in this section include notice of violation, administrative compliance order, cease and desist order, termination of service, civil and criminal penalties.

3. Gives the Director of Public Works the authority to inspect facilities and sample the wastewater discharged to the City sewer to ensure compliance with the provisions of the sewer code, requirements of the industrial wastewater discharge permit and all applicable federal and state laws and regulations. In addition, the city may enter a user's property at any hour under emergency circumstances involving the city's sewerage system. The city shall have the right to set up on the user's property such devices as are necessary to conduct sampling, inspection, compliance monitoring and/or metering operations.

Operation and Maintenance Program

WDR Requirement: The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:

- (a) **Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable storm water conveyance facilities;**
- (b) **Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;**
- (c) **Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;**
- (d) **Provide training on a regular basis for staff in sanitary sewer system operations and**
- (e) **Provide equipment and replacement part inventories, including identification of critical replacement parts.**

The City has a variety of preventative maintenance programs in place to reduce the number of SSOs from the sewer system including Area and High Maintenance Cleaning, root control, CCTV, and lift station maintenance. These programs allow for the Collections staff to continually evaluate the system.

- (a) **Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes, valves and applicable storm water conveyance facilities;**

The City has a complete Geographic Information Systems (GIS) database of all wastewater collections infrastructure. City staff uses ruggedized laptops with a mobile GIS software called InfraMap, which shows the features of the collection system such as pipe material, elevations, and manhole numbers. Collections staff make necessary

corrections when discrepancies are found, and these discrepancies are regularly incorporated into the GIS database.

- (b) Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance program should have a system to document scheduled and conducted activities, such as work orders;**

The City uses a maintenance program for scheduling and tracking maintenance and field data. InfraMap Software is used for field data collection on sewer pipelines, manholes, preventative cleaning, HMAs, mechanical rodding, and CCTV. The City also utilizes IT Pipes when conducting CCTV inspections. IT Pipes is a pipeline management program where pipeline condition assessments are conducted and documented. If further review is necessary, the collections supervisor will conduct a thorough review of the CCTV inspection and make appropriate recommendations to the Wastewater Resources Manager.

Preventative Maintenance

The two main preventative maintenance programs are Area Cleaning and HMAs. The HMA program includes areas of the sewer system that are known to have problems such as the build-up of sediment or FOG, or roots or have experienced SSOs. HMAs are scheduled for monthly, quarterly, semi-annual, or annual cleaning depending on the severity of the problem. The remainder of the system is maintained under the Area Cleaning program. The City's goal is to clean the entire system once every two years. Cleaning is done using the Jetter or the Combo Hydro-Vac and includes high velocity cleaning, mechanical and manual rodding.

Closed Circuit (CCTV) Inspection of Sewers

The City purchased a CCTV Van in 2008. CCTV is used after lines are cleaned to assure that the line was properly cleaned and to inspect the condition of the line. Staff grade the lines for cleaning efficiency and condition. CCTV inspection records are reviewed to identify deficiencies. Lines that exhibit high flow levels or operational failures are identified. Further reviews determine the cause and/or immediate or accelerated corrective actions. Lines with problems are placed on the HMA list. HMA cleaning or maintenance frequency depends on the severity of the problem. CCTV is also performed after an SSO to identify any necessary repairs or special maintenance needs.

In late 2014, the City replaced the robotic video camera and cable reel with an Envirosight Rover X crawler and 1,000' video cable reel. The video management software was also upgraded to the IT Pipes pipeline management program.

Fats, Oils, and Grease Cleaning

Areas that are known to have FOG problems are included on the HMA list for increased attention to prevent the occurrence of overflows. Rodding of the lines is also used where there is heavy build up in the lines.

Root Control

Prior to 2014, the City used chemical foam to occasionally control roots in sewer lines. In an effort to improve the health of the City's biological treatment process, the City switched to mechanical control of roots using static rotating jet nozzles in 2014. Many of the sewer lines that require root control are part of the HMA list and are treated monthly, quarterly, or semi-annually.

Lift Station Maintenance

City staff inspects each lift station three times per week. One staff person is scheduled for inspection and maintenance repair. Pump and related equipment are scheduled for maintenance based on the manufacturers recommended schedule.

All lift stations have duplex or triplex pumping systems and either have built-in backup emergency or capability to plug in portable emergency power. They are also equipped with Supervisory Control and Data Acquisition (SCADA) systems to alert city staff of problem conditions.

- (c) **Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;**

In 2019, the City adopted a new Wastewater Collection System Renewal Strategy and Master Plan, prepared by Water Systems Consulting Inc. (WSC). Development of the Master Plan included preparation of a hydraulic model of the entire City sewer system with a forecast of wastewater flows from planned development areas to determine where there may be capacity deficiencies in the future. The Master Plan also includes analysis of the lift stations and all existing segments of the sewer system to determine how much annual funding should be set aside for repair and rehabilitation of existing infrastructure. The recommendations of the Master Plan formed the basis of the City's capital improvement program. This new capital improvement program, presented below, became the basis of a new sewer rates study conducted in 2020. In early 2021, the City adjusted sewer rates and now has adequate funding for implementation of the capital improvement program for the foreseeable future. The City intends to do a comprehensive update of its collection system master plan approximately every 10 years.

- (d) **Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained;**

Training is an important aspect in the Wastewater Division and a training budget exists to ensure all Wastewater staff are properly trained. New staff receive on-the-job training specific to the collection system and maintenance equipment used. Wastewater staff also attend outside workshops whenever possible. Grade Certification in Collection

System Maintenance is encouraged as well as self-improvement training through online courses. On-the-job cross training is actively pursued to ensure that each staff has proficient working knowledge of each and every specific part of a task.

All staff are trained on new equipment by the contractor or manufacturer. Equipment manuals are reviewed by staff for maintenance and operational parameters.

The City provides much of the required safety training through the California Joint Powers Insurance Authority (CJPIA) and outside training workshops. Staff receive training in Confined Space Entry, Hazardous Materials Management, and First Aid and CPR. Training includes formal classroom training, informal on-the-job and hands-on training.

Wastewater staff are also trained to respond to major emergencies and disasters. The City has an emergency operation center and emergency response teams established. Procedures and the implementation of emergency response are outlined in the Spill Response and Prevention Handbook as well as the Emergency Response Plan developed by the Emergency Operations Center for the City.

Proficiency is required for all job positions and promotions, and training records are maintained to monitor completed classes and schedule employee training.

Construction contractors working on City projects are required to have an approved sewage bypass system and emergency response plan in place prior to start of construction. Contractors are instructed to notify staff immediately and to take immediate action to stop any overflow. These procedures are outlined and discussed at the pre-construction meeting and enforced by the City.

(e) Provide equipment and replacement part inventories, including identification of critical replacement parts;

The City does not keep parts and supplies in inventory that can be readily accessed from local suppliers due to space constraints. Lining and replacement of underground pipelines, manholes and lift stations are contracted out to licensed contractors who have the equipment, materials, and staff to complete the work. Redundancy is provided in all lift station equipment.

The City either has permanent generators and a fleet of two (2) portable backup generators for emergency use that are kept in the ready stand-by mode at all times in case of emergency.

Design and Performance Provisions

WDR Requirement: The SSMP must include:

- (a) Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and**
- (b) Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.**

Installation of all new sanitary sewer systems, lift stations, and other appurtenances, as well as rehabilitation and repair of existing sewer systems, must adhere to the City of Paso Robles Public Works Department's October 2020 Standard Details and Specifications (hereafter "Standards), including any revisions thereto. The Standards are available on the City's website at: <https://www.prcity.com/217/Engineering-Standards>

The City Engineer, Wastewater Manager and Collections Supervisor review plans for construction of new collection system infrastructure for adherence to the Standards.

Procedures and standards for testing the installation of new sewers, pumps, and other appurtenances, as well as rehabilitation and repair projects, are specified in the Standards. For example, prior to final approval, and after compacting backfill, all sewer lines shall be tested for leakage by a standard low pressure air test and deflection by a mandrel test. All new sewer installations, private lateral connections, and sewer rehabilitation projects must be inspected by Public Works Department staff or a contract inspector prior to approval.

The City Engineer is responsible for periodically updating the Standards. The Wastewater Division informs the City Engineer of any Standards changes necessary to improve performance of the wastewater collection system.

Overflow Emergency Response Plan

WDR Requirement: 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;
- (b) A program to ensure an appropriate response to all overflows;
- (c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the 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;
- (d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (f) A program to ensure that all reasonable steps are taken to contain 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 Wastewater staff strives for a proactive approach to maintenance in an effort to reduce or minimize SSOs having impacts to the public health and safety or the environment. Staff responds to

all reported SSOs within the City. All overflows or stoppages are documented, including those in private laterals for which the City is not legally responsible.

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

The Wastewater Division follows all regulatory requirements relating to Sewer System Overflow Response. A copy of the Sewage Overflow Reporting Guidelines is placed in every vehicle for staff to use in the field. The guideline outlines the reporting procedures and the agencies that must be notified.

All SSOs are responded to immediately during working hours and by standby staff after hours. Figure 2, on page 7, outlines the process for receiving, responding to and reporting SSOs. If an SSO has occurred, the Wastewater Supervisor is advised and notifies the required agencies.

All SSOs that reach a waterway are reported to the Office of Emergency Services within 2 hours of becoming aware of the release. Notification is also made to Environmental Health as outlined in the SSO Report Manual, along with appropriate phone numbers.

(b) Program to ensure an appropriate response to all overflows;

All wastewater staff are trained on the appropriate response to SSOs. As stated above, written guidelines are provided in each vehicle for reporting SSOs, assessing the overflow, documenting the overflow, estimating the volume of overflow. The procedures are in place to provide immediate response and to protect the exposure to the public.

Construction contractors working on City projects are required to have an approved sewage bypass system and emergency response plan in place prior to start of construction. Contractors are instructed to notify staff immediately and to take immediate action to stop any overflow. These procedures are outlined and discussed at the pre-construction meeting and enforced by the City.

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

The City's Spill Response and Prevention Handbook outlines the notification steps and includes a complete up to date notification list. The severity and potential impact of the overflow determine the path of notification. All SSOs that enter the waters of the state are reported immediately to the appropriate agencies. Staff's priority is to take all feasible steps and necessary remedial actions to control or limit the release of untreated wastewater, minimize, or prevent the discharge and recover as much of the wastewater discharged as possible.

Spills that do not reach the waters of the state are reported to Environmental Health within two hours of knowledge of the event. Environmental Health is also notified of any spill that may endanger human health or is greater than 50 gallons. The Health Officer determines if public notification is necessary such as local press release and posting the affected area.

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

The City has a Multi-Hazard Emergency Response Plan which is available to all personnel and is used as a resource in the emergency response training. New employees receive this training as part of their orientation. All other staff are trained on emergency response procedures on an annual basis.

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.

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

The City is in the process of updating the Spill Response & Prevention Handbook that was developed in 1999. This is in addition to the guidelines in each vehicle describing response to agencies, charts for estimating overflow volume and clean up procedures.

The Collections Division has a standby operator for after hour emergencies. The standby operator is either notified by the SCADA alarm system or police dispatch for overflows that are called in by the public. It is the responsibility of the standby operator to determine whether assistance in handling the spill is needed. The City's Police, Fire, and Public Works Street Departments can be used in the event of a major situation for traffic and crowd control.

(d) 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.

Public health and safety along with the environment are the City's first concerns on any SSO. The City's proactive programs to prevent SSOs include extensive and aggressive cleaning, videoing, root control and implementation of a Fats, Oils, and Grease Program.

Wastewater staff are trained that the highest priorities are to contain the overflow and minimize, if not prevent, the overflow discharge from reaching the water ways and eliminate exposure to the public and impact on public health. Staff use the combination hydro/vac truck for vacuuming up discharged wastewater, contaminated debris and wash down water. The Spill Response and Prevention Handbook provides guidance to the staff in order to accomplish this objective.

Fats, Oils, and Grease Control Program

WDR Requirement: The Waste Discharge Requirement requires that each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- (a) Implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG:
- (b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area.
- (c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG:
- (d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements:
- (e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance
- (f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section
- (g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified above.

Due to the number of Food Service Establishments (FSEs) located in the City and the fact that 18% of SSOs in 2007 were a result of grease blockages, the City determined a FOG Program necessary. The City's Industrial Waste Manager and Water Quality Inspector implement a FOG program under the Sewer Use Ordinance. The City has been inspecting all FSEs since June 2008. FSEs are permitted and inspected annually to ensure that the Grease Control Devices (GCDs) are in working order, and waste fry oil and grease are properly stored and disposed of.

- (a) **Implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG:**

The City developed a Fats, Oils, and Grease control Manual for FSEs in 2021 which describes Grease Control Device (GCD) requirements. The manual covers types of GCDs, sizing, fixtures required to be connected, cleaning, and Best Management Practices (BMPs). The manual is incorporated by reference into Article V of Chapter 14.10.290 of the SUO. The manual is available in both English and Spanish.

The City has brochures for homeowner to prevent FOG from entering the City sewer. The City's education contractor that conducts field trips for the Paso Robles Schools at the wastewater plant, discusses not discharging FOG down the drain during his field trips.

- (b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area**

Currently, there are not any FOG disposal facilities located within San Luis Obispo County. Food facilities must collect the waste FOG and properly store the oil and grease for disposal or recycling. Owners of FSEs are referred to the internet for licensed haulers to clean grease interceptors and haul waste FOG. The City does not allow FOG to be discharged into the sewer system.

FSEs are required to prevent waste FOG discharges into the sewer system by implementing BMPs:

- Collect and properly store waste cooking fry oil in recycling barrels or drums.
- Use a licensed hauler or a recycling facility to dispose of this waste.
- Clean the Grease Control Devices (GCD) on a regular basis and keep a log of the maintenance/cleaning.
- Receipts from haulers must be available for review

- (c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG:**

Chapter 14.10 of the Municipal Code, authorizes the City to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG. The City's sewer use ordinance:

1. Limits discharges to 100 mg/L Oil and Grease.
2. Incorporates the Fats, Oils, and Grease Manual
3. Provides City the authority to supplement the ordinance with more stringent limitations and prohibitions if necessary.
4. Requires grease interceptors be installed at FSEs. GCDs must be sized and installed per the California Plumbing Code.
5. Provides City staff authority to require property owners to install upgraded equipment if the existing removal device does not adequately remove FOG.

- (d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements:**

The City's Fats, Oils, and Grease Manual, which is incorporated by reference into the SUO requires installation of GCDs as deemed necessary by the City. All GCDs must be sized using the California Plumbing Code, be in an easily accessible location for the purposes of cleaning and inspection and are required to be properly maintained. The ordinance provides the City authority to require property owners to install upgraded equipment if the existing removal device does not adequately remove FOG.

The City has adopted the 2019 California Plumbing Code (CPC) as its standard. A permit from the Building Department is required to install a GCD. Plans are reviewed to ensure that GCDs are properly sized per the CPC and are inspected to ensure the device was properly installed.

Under the City's FOG Program FSEs are permitted and inspected annually. FSEs are required to keep a log of the GCD maintenance, which includes the date and the person or contractor conducting the cleaning. Receipts for cleaning interceptors must be kept for three years and available for review.

(e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance

The City's sewer use ordinance:

1. Gives the Director of Public Works and his/her designee the authority to inspect facilities and sample the wastewater discharged to the City sewer to ensure compliance with the sewer code, industrial wastewater discharge permits and all applicable federal and state laws and regulations. In addition, City staff may enter a sewer user's property at any hour under emergency circumstances involving the City's sewerage system. The City has the right to set up on the user's property such devices as necessary to conduct sampling, inspection, compliance monitoring and/or metering operations.
2. States that enforcement actions shall be initiated when any violation of any permit condition is noted, including discharge violations. Any user who violates the conditions of the permit or the code is subject to having its permit revoked.
3. Gives the Director of Public Works the authority to administer, implement, and enforce policies and standards necessary to protect the City facilities. Enforcement procedures in this section include notice of violation, administrative compliance order, cease and desist order, termination of service, civil and criminal penalties.

The City currently has a half-time Water Quality Inspector that inspects and enforces the FOG requirements.

(f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section

The City's Collections crew has identified areas of the collection system with FOG problems. As described above, these areas are on the High Maintenance Area list and are cleaned monthly.

(g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified above.

See subsections (a) and (d) above.

System Evaluation and Capacity Assurance Plan

WDR Requirement: The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

- (a) **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
- (b) **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and
- (c) **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.
- (d) **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14.

Water Systems Consulting (WSC) comprehensively evaluated the capacity of the City's collection system for existing and future wastewater flows. WSC analyzed the City's General Plan population growth patterns, high maintenance areas, wastewater travel times, inflow and infiltration, flow monitoring, and capacity of all lift stations. This information was incorporated into a hydraulic model to find collection system deficiencies. WSC documented these findings in the Wastewater Collection System Renewal Strategy and Master Plan dated October 2019. The Master Plan is available for public review at City Hall, 1000 Spring Street, Paso Robles or a copy may be requested.

The renewal Strategy and Master Plan identifies projects necessary to correct existing deficiencies, accommodate projected buildout flows, or accommodate planned expansions of the City's collection system. The capital improvement plan is presented below in Table 2.

Table 2: Paso Robles Wastewater Collection System Capital Improvements Plan

Project	Fiscal Year						
	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
A1, Replace/upsize Vendels Circle sewer						\$625,683	
A2, Properly abandon South River Rd. manholes		\$414,812					
A3, Replace discharge piping at Lift Stations 2,3,7,8, and 13			\$354,044				
A4, Condition evaluation of Lift Stations 1 and 2 pipe bridges				\$180,081			
A6, Replace 910 feet of existing 27 inch sewer with 30 inch sewer in South River Rd near Navajo Ave. Influenced by South Chandler and Olsen developments						\$712,097	
A7, Upsize sewers in Commerce Way, Scott St, Flag Way. Influenced by South Chandler and Olsen developments.		\$2,577,987					
A9, B8, C4, and D5: Replace 0.84 miles of aging pipe per year based on phased strategy	\$485,645	\$500,214	\$515,221	\$546,598	\$844,493	\$1,125,991	\$1,159,771
A10, Re-coat piping manifold at Lift Station No. 1		\$14,853					
B1, Replace 1,370 feet of sewer along 2nd St and Spring St						\$814,344	
B2, Replace Lift Station No. 2							\$2,715,561
Total Planned Capital Expenditures =	\$485,645	\$3,507,866	\$869,264	\$726,679	\$1,166,888	\$3,278,115	\$3,875,333

Monitoring, Measurement, and Program Modifications

WDR Requirement: The City of Paso Robles shall:

- (a) **Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;**
- (b) **Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;**
- (c) **Assess the success of the preventative maintenance program;**
- (d) **Update program elements, as appropriate, based on monitoring or performance evaluations; and**
- (e) **Identify and illustrate SSO trends, including: frequency, location, and volume.**

The City will measure the performance of its wastewater collection system and the effectiveness of the SSMP with:

- SSO Rate (SSO's/100 miles of collection system/year);
- Number of SSO's by cause (roots, grease debris, pipe failure, capacity, lift station failure, etc.);
- Average SSO volume (gallons);
- Percentage of SSO's greater than 100 gallons;
- Percentage of SSO volume recovered (e.g, with Vactor truck) compared to total volume spilled.
- Estimated total SSO's volume to reach surface waters (including SSO's not recovered from storm drains leading directly to surface waters).

The City has been reporting SSO's through the California Integrated Water Quality System (CIWQS) since 2007. CIWQS data will be used as the City's historical data. The City will evaluate the above performance measures annually, in July, for the previous fiscal year. This evaluation will be used to make any necessary adjustments to the City's preventative maintenance program (e.g., spend more time on rooting, less time on lift station inspections).

Program Audits

WDR Requirement: The City “shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee’s compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.”

Beginning in July 2011, and every two years thereafter, the Wastewater Resources Manager will audit the effectiveness of all elements of this SSMP. The Wastewater Resources Manager will document audit findings and recommend changes to the SSMP in a written report to the Public Works Director and City Manager. These audit reports will be kept on file and made available to the public upon request. Minor changes to the SSMP, such as changes to the operation and maintenance element, will be made at the staff level. Significant changes, such as changes to legal authority, must be reviewed and approved by the City Council. The latest version of the SSMP will always be available on the internet at:

<https://www.prcity.com/495/Wastewater>

Communication Program

WDR Requirement: The City “shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented. The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee’s sanitary sewer system.

The City Council approved this SSMP during a regularly scheduled meeting in October 2009. The meeting was publicly noticed and the draft SSMP was available for public review prior to the meeting. The public had the opportunity to comment on the SSMP prior to City Council approval.

The adopted SSMP is posted at the internet address shown above with instructions to the public on how to provide input on the SSMP. The Wastewater Resources Manager receives all public input. He will consider changes to the SSMP every two years, during the program audit process.