

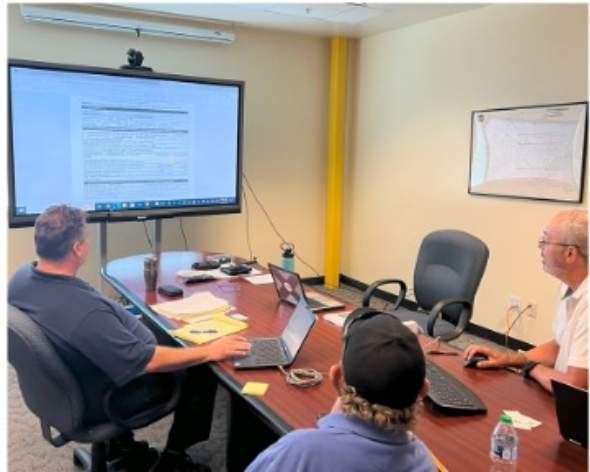
Best Practices for Expediting WDR Compliance



James Fischer, P.E.
Fischer Compliance LLC



Richard Cunningham
Fischer Compliance LLC



5/22/2024 (SASD)



LIVE POLLING!



How this Training Helps



Content

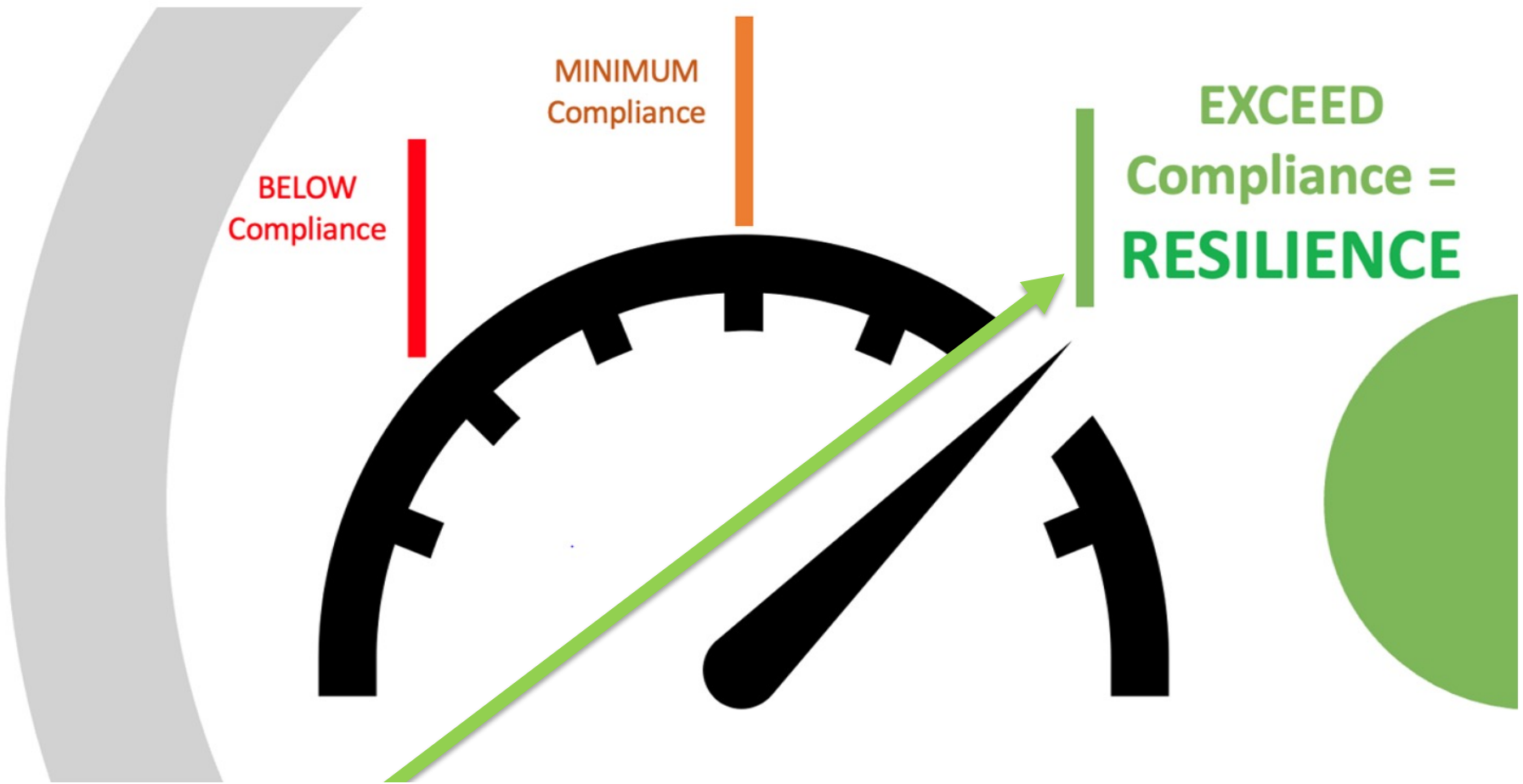
1. Agency WDR Survey
2. Reissued WDR (What's Changed/How to Comply?)
3. Noncompliance Observations
4. Preparing for inspectors
5. Conclusions

1. Agency WDR Survey



5/22/2024 (SASD)



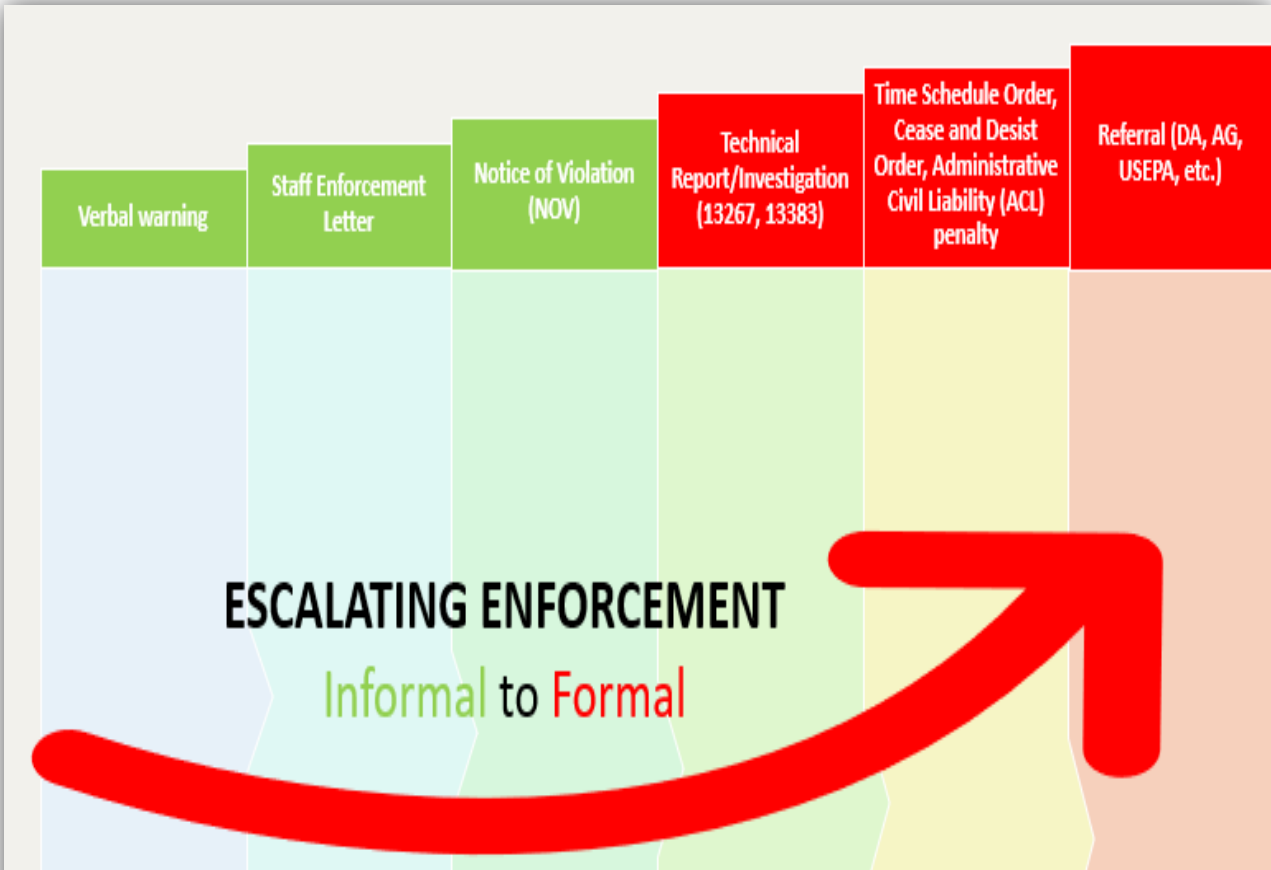


5/22/2024 (SASD)



4. Preparing for inspectors

Review Enforcement!



Region	Number of Actions	Liability Total	Liability Paid/Completed
1	17	\$670,978	\$670,618
2	14	\$2,786,570	\$2,786,570
3	10	\$1,056,792	\$1,056,792
4	9	\$2,107,390	\$1,946,371
5F	1	\$130,000	\$130,000
5R	1	\$53,212	\$53,212
5S	12	\$3,423,977	\$3,423,977
6V	1	\$750,000	\$750,000
7	5	\$174,558	\$174,558
8	4	\$190,750	\$190,750
9	15	\$5,994,699	\$5,994,699
SB	1	\$10,400	\$10,400
TOTALS	90	\$17,349,326.00	\$17,187,947.00

4. Preparing for inspectors

Review Enforcement!

The screenshot shows the website for the State Water Resources Control Board. The navigation bar includes links for Board, Programs, Drinking Water, Water Quality, Water Rights, Notices, Water Boards, and Search. The main content area is titled "Office of Enforcement" and is divided into three columns. The left column has an "Overview" section with text about the office's creation in 2006 and its role, followed by a "Report Fraud" section. The middle column has a "Resources" section with sub-sections for "Contacts", "Policies and Priorities", "Actions/Orders/Press/Reports/Data", and "Environmental Justice". The right column is empty. At the bottom, there is a section for "Office of Enforcement Programs" with several small images.

Water Boards | State Water Resources Control Board

Board | Programs | Drinking Water | Water Quality | Water Rights | Notices | Water Boards | Search

Home | Water Issues | Programs | Enforcement

Office of Enforcement

Overview

The Office of Enforcement was created in 2006 to emphasize enforcement as a key component of the Water Board's water quality regulatory functions and statutory responsibilities.

Our role is to ensure that violations of orders and permits result in firm, fair, and consistent enforcement through direct actions, the development of policies and guidance, and the identification of metrics for decision-making on enforcement issues.

We are comprised of legal and investigative staff. The attorneys assist technical staff in the State Water Board and Regional Water Boards in bringing administrative liability actions before the Water Boards and help prepare cases for referral to outside prosecutors. The investigative staff is divided into four units; the Special Investigation Unit (SIU); the Underground Storage Tanks (UST) Enforcement Unit; the Cannabis Enforcement Unit; and the Fraud, Waste and Abuse Prevention Unit (FWA).

- **New!** 2023 Proposed Water Quality Enforcement Policy.
- Visit The Office of Enforcement Director Yvonne West's page.

Report Fraud

If you think someone is committing fraud, misusing UST Cleanup Fund monies, or intentionally misrepresenting data, it is important to let us know. All allegations of potential fraud are taken seriously, and you can remain anonymous.

- Visit our "Fraud, Waste and Abuse Prevention" page to learn - **How to Report Fraud**

Resources

Contacts

- Enforcement Coordinators
- Main phone number (916) 341-5272

Policies and Priorities

- Water Quality Enforcement Policy and Amendments
- Supplemental Environmental Projects (SEP) Policy
- Enforcement Priorities

Actions/Orders/Press/Reports/Data

- Complaints, Judgments, Disciplinary Actions, and News Releases
- Enforcement Press Releases
- Enforcement Reports
- Performance Report: Enforcement
- Water Boards Data and Databases

Environmental Justice

- Salinas Valley Clean Drinking Water Program
- Environmental Justice page

Office of Enforcement Programs

5/22/2024 (SASD)



4. Preparing for inspectors

Review Enforcement!

Office of Enforcement

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Our role is to ensure that violations of orders and permits result in firm, fair, and consistent enforcement through direct actions, the development of policies and guidance, and the identification of metrics for decision-making on enforcement issues.

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Office of Enforcement Programs



5/22/2024 (SASD)

CA.GOV

State Water Resources Control Board

Board Programs Drinking Water Water Quality Water Rights Notices Water Boards Search

Home | Water Issues | Programs | Enforcement | Proposed Amendments

Proposed Amendments

Proposed amendments to the Water Quality Enforcement Policy (Enforcement Policy) would clarify certain principles that are central to ensure a more transparent and consistent application of the statutory factors outlined in the California Water Code (Water Code) sections 13327 and 13385, subdivision (e) that the Water Boards must consider when assessing a civil liability. The amendments would also establish a template for procedures for evidentiary hearings to consider imposition of administrative civil liability, re-organize several sections to improve efficiency and flow, and add clarifications to a variety of provisions to enhance transparency to the Water Boards' enforcement process and penalty methodology application. Non-substantive technical amendments would increase comprehensibility.

- Attachment A – Enforcement Policy Revisions Since April 18, 2023
- Attachment B – Enforcement Policy Cumulative Revisions
- State Water Board Resolution No. 2023-0043
- 2023 Enforcement Policy Revisions since April 18, 2023
- 2023 Enforcement Policy - Response to Public Comments
- Second Revised Notice - New Date for Consideration of Adoption
- Notice for Opportunity for Public Comment, Public Hearing and Consideration of Adoption
- Draft Water Quality Enforcement Policy

(Page last updated 2/6/24)

- Updated in 2023
- Updated focus on Env. Justice
- Updated focus on Disadvantaged Communities
- Updated CONDUCT FACTORS (Culpability, Cleanup, History)
- Other (high volume spills, annual updates to board, etc.)



4. Preparing for inspectors

Review Enforcement!

TABLE 4 – Violator’s Conduct Factors

Factor	Adjustment
Degree of Culpability	<p>Discharger’s degree of culpability prior to the violation: Higher liabilities should result from intentional or negligent violations than for accidental, non-negligent violations. A first step is to identify any performance standards (or, in their absence, prevailing industry practices) in the context of the violation. The test for whether a discharger is negligent is what a reasonable and prudent person would have done or not done under similar circumstances.</p> <p>Adjustment should result in a multiplier between 0.75 and 1.5, with a higher multiplier for intentional misconduct and gross negligence, and a lower multiplier for more simple negligence. A neutral assessment of 1.0 should be used when a discharger is determined to have acted as a reasonable and prudent person would have. A multiplier of less than 1.0 should only be used when a discharger demonstrates that it has exceeded the standard of care expected of a reasonably prudent person to prevent the violation.</p>
History of Violations	<p>Any prior history of violations: Where the discharger has no prior history of violations, this factor should be neutral, or 1.0. Where the discharger has at least one prior violations within the last five years, the Water Boards should use a multiplier of 1.1. Where the discharger has a history of similar or numerous dissimilar violations, the Water Boards should consider adopting a multiplier above 1.1.</p> <p><u>For the purpose of this factor, “violation” means a self-reported, stipulated, or adjudicated violation of the Water Code, Health and Safety Code, or similar environmental protection statute. Under no circumstances shall this factor ever be below 1.0.</u></p>
Cleanup and/or Cooperation	<p>Voluntary efforts to cleanup and/or to cooperate with regulatory authorities in returning to compliance after the violation: Adjustment should result in a multiplier between 0.75 to 1.5, using the lower multiplier where there is exceptional cleanup and cooperation compared to what can reasonably be expected, and higher multiplier where there is not. A reasonable and prudent response to a discharge violation or timely response to a Water Board <u>Notice of Violation, order, or similar communication identifying the violation order</u> should receive a neutral adjustment as it is</p>



2. Reissued WDR (What's Changed/How to Comply?)

What Has Changed?

Reissued WDR (2022-0103-DWQ)

- Builds on 2006 Order requirements
- Updates 16-year-old 2006 Order
- Incorporates Water Code Authorities
- Defines expectations/emphasizes protection of Water of the State (including surface waters and groundwater)
- Addresses resiliency/climate change impacts
- Clarifies enforceability of Order with CIWQS + failure to report/certify
- More explicit requirements

STATE WATER RESOURCES CONTROL BOARD
1001 I Street, Sacramento, California 95814
ORDER WQ 2022-0103-DWQ
STATEWIDE WASTE DISCHARGE REQUIREMENTS
GENERAL ORDER FOR SANITARY SEWER SYSTEMS

This Order was adopted by the State Water Resources Control Board on December 6, 2022.
This Order shall become effective **180 days after the Adoption Date of this General Order**, on June 5, 2023.
The Enrollee shall comply with the requirements of this Order upon the Effective Date of this General Order.

This General Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, protect the Enrollee from liability under federal, state, or local laws, nor create a vested right for the Enrollee to continue the discharge of waste.

CERTIFICATION

I, Jeanine Townsend, Clerk to the Board, do hereby certify that this Order with all attachments is a full, true, and correct copy of the Order adopted by the State Water Board on December 6, 2022.

AYE: Chair E. Joaquin Esquivel
Vice Chair Dorene D'Adamo
Board Member Sean Maguire
Board Member Laurel Firestone
Board Member Nichole Morgan

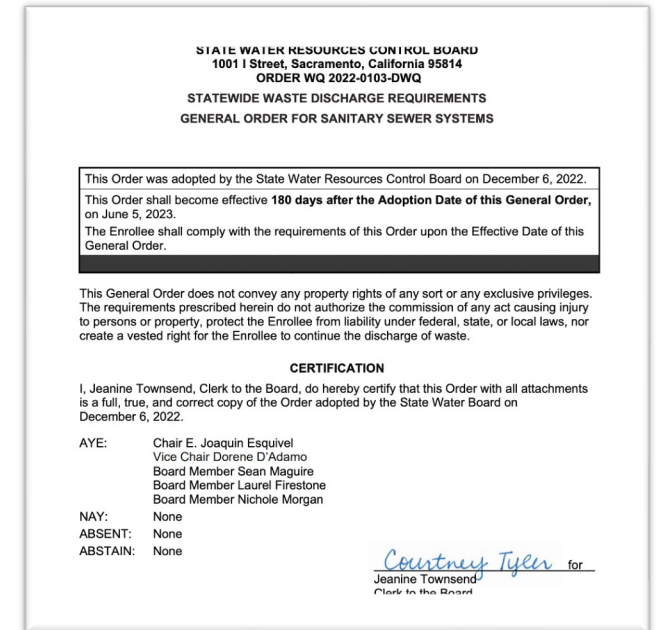
NAY: None
ABSENT: None
ABSTAIN: None

Courtney Tyler for
Jeanine Townsend
Clerk to the Board

2. Reissued WDR (What's Changed/How to Comply?)

What Has Changed?

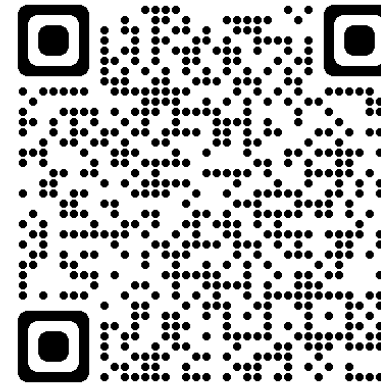
Examples	2006 WDR	2022 WDR	Changes/Increase
Length	~40+ pages with MRP	~85+ pages including MRP	>50%
Enforcement	Minimal citations	Numerous citations	Substantial (Water Code 13327)
"Procedures"	11	25	>50%
"Shall"	55	123	>50%
Training	Very few mentions	Requires knowing Order, practice drills, competency, vol. estimation, etc.	Substantial (LRO, Spec. 5.1) (O/M, Att. D-4.3)



2. Reissued WDR (What's Changed/How to Comply?)

SSMP Guidance Manual

- Reflects Statewide Sanitary Sewer Systems General Order reissued in 2022
- Sponsored by BACWA, but intended for all enrollees across the state
- Stakeholder Review (**due 4/19/24**)
- State Water Board staff to review and provide a link to final version
- Final expected June 2024!



Guide for Developing and Updating of Sewer System Management Plans (SSMPs)

BACWA
BAY AREA
CLEAN WATER
AGENCIES

Stakeholder Review Draft
March 22, 2024

2. Reissued WDR (What's Changed/How to Comply?)

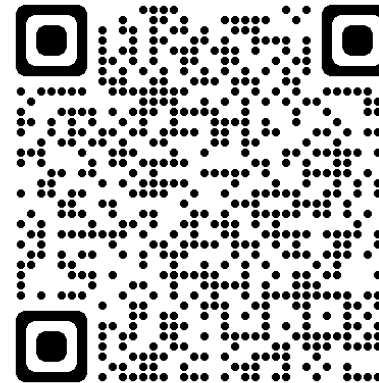
Regional Enforcement

Enforcement Considerations

Agency Legally Responsible Officials, managers, governing boards should review and be aware of potential liabilities for noncompliance with the Reissued WDR. An excellent practice is to review enforcement language outlined in **Specifications 5.17 and 5.18** (page 27) and Provisions 6 (pages 27-31) of the Reissued WDR. In addition, agencies should keep abreast of the latest Water Board enforcement penalty actions within their respective service areas (see [CIWQS Administrative Civil Liability ACL Report](#)) and also review example enforcement for improving understanding about the enforcement process and potential ramifications for noncompliance (see examples below).

- Region 1: North Coast Regional Water Board [example enforcement](#)
- Region 2: San Francisco Bay Regional Water Board [example enforcement](#)
- Region 3: Central Coast Regional Water Board [example enforcement](#)
- Region 4: Los Angeles Regional Water Board [example enforcement](#)
- Region 5: Central Valley Regional Water Board [example enforcement](#)
- Region 6: Lahontan Regional Water Board [example enforcement](#)
- Region 7: Colorado River Regional Water Board [example enforcement](#)
- Region 8: Santa Ana Regional Water Board [example enforcement](#)
- Region 9: San Diego Regional Water Board [example enforcement](#)

In addition, agencies should also review the [Water Board Enforcement Policy](#) for improving understanding about the specific factors considered by State/Regional Water Boards in assessing civil liabilities with [formal enforcement Orders](#).



Guide for Developing and Updating of Sewer System Management Plans (SSMPs)



Stakeholder Review Draft
March 22, 2024

3. Noncompliance Observations

Noncompliance (SWRCB/Enforcement – AC24)

Topic	Areas of Concern Presented
Failure to re-enroll under Reissued WDR	- Violation of WDR; inspections planned for system failing to re-enroll
Annual Reports	- Data inconsistencies/incomplete data, carried year after year
Program Auditing (online, data requests, in-person)	- SSMPs (failure to certify on time); SSMP Audits (failure to audit and incorporate improvements into SSMP); failure to implement SSMP (no "shrink-wrapped docs on shelf" "expect SSMPs to be in use"
Spill Reporting	- Suspect reporting (never a single Category 1 spill reported, always reporting category 2 spills, etc, unrealistic start times.
Field Inspection Examples (1)	- Failure to ID/establish/implement capital improvement program, poor asset conditions, poor program competency
Field Inspection Examples (2)	- Findings (buildup of fats, oils, and grease, inadequate lift station O/M, corrosion/poor pump conditions, discharge from leaking air release valve,
Communication (Element 11)	- Lack of satellite communications

3. Noncompliance Observations

Noncompliance (WDR Experts – AC24)

Requirement	Areas of Concern
Reporting 1 (A Morrison)	- Reporting non-Cat. 1 lateral spills as Cat. 2, 3, or 4
Reporting 2 (A Morrison)	- Entering individual Cat. 4 or non-Cat. 1 lateral spills as they occur but skipping required monthly reporting
Change log (A Morrison)	- Remember to update
Data management (M Flores)	- Challenges pulling together to make informed decisions
Reporting 1 (M Flores)	- Spill reporting certifications before deadlines and >100 agencies recently with spill reports not certified on time
Coordination (M Flores)	- Limited pre-planned coordination and collaboration with storm drain agencies and other utilities prior to/after spills
Monitoring, Measurement Program (M Flores)	- Limited data/modifications/SSMP revisions between SSMP updates
Communication (M Flores)	- Lack of public communication on SSMP implementation/updates
SERP (J Fischer)	- Lack of effort, non-compliance, lack of training/drills/implementation/coordination
SSMP Audits (J Fischer)	- Failure to conduct, lack of effort to ID commitments moving forward for SSMP updating
Field data collection (J Fischer)	- Failure to collect required data/accuracy, weakness in reliability/holding up to scrutiny
Training (J Fischer)	- Lack of training ("tailgate sheets" only; no drills; no SOPs, documentation; SSMP familiarity

4. Preparing for inspectors



5/22/2024 (SASD)



4. Preparing for inspectors

Review Reissued Order!

STATE WATER RESOURCES CONTROL BOARD
1001 I Street, Sacramento, California 95814
ORDER WQ 2022-0103-DWQ
STATEWIDE WASTE DISCHARGE REQUIREMENTS
GENERAL ORDER FOR SANITARY SEWER SYSTEMS

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The Enrollee shall comply with the requirements of this Order upon the Effective Date of this General Order.

This General Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, protect the Enrollee from liability under federal, state, or local laws, nor create a vested right for the Enrollee to continue the discharge of waste.

CERTIFICATION

I, Jeanine Townsend, Clerk to the Board, do hereby certify that this Order with all attachments is a full, true, and correct copy of the Order adopted by the State Water Board on December 6, 2022.

AYE: Chair E. Joaquin Esquivel
Vice Chair Dorene D'Adamo
Board Member Sean Maguire
Board Member Laurel Firestone
Board Member Nichole Morgan

NAY: None
ABSENT: None
ABSTAIN: None

Courtney Tyler for
Jeanine Townsend
Clerk to the Board

STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER

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STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER

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Attachment F – Regional Water Quality Control Board Contact Information F-1

5/22/2024 (SASD)



4. Preparing for inspectors

Review Compliance Info!

The screenshot shows the website for the State Water Resources Control Board. The main heading is "Sanitary Sewer Systems General Order". Below the heading is a paragraph explaining that sewage is untreated or partially treated domestic, municipal, commercial and/or industrial waste (including sewage sludge), and any mixture of these wastes with inflow or infiltration of stormwater or groundwater, conveyed in a sanitary sewer system. A spill is a discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system spill, operational failure, and/or infrastructure failure. Sewage and its associated wastewater spilled from a sanitary sewer system may threaten public health, beneficial uses of waters of the State, and the environment.

Below this is the "General Order Information" section, which states that to provide a consistent, statewide regulatory approach to address sanitary sewer spills, the State Water Board adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Sanitary Sewer Systems General Order) on December 6, 2022. The Sanitary Sewer Systems General Order requires public agencies that own or operate sanitary sewer systems to develop and implement sewer system management plans and report all sanitary sewer spills to the State Water Board's online California Integrated Water Quality System (CIWQS) Sanitary Sewer System Database.

A list of links is provided: "Statewide Sanitary Sewer Systems General Order – Effective June 5, 2023".

At the bottom, there is a "Quick Links" section with two items: "Electronic Sanitary Sewer System Service Area Boundary Map Specifications" and "Sewer System Management Plan and Program Audit Due Dates Lookup (search by WQID number)".



General Order Compliance Tools

Statewide Sanitary Sewer Systems General Order (2022-0103-DWQ) Overview

- Training Video

How to Continue Existing Regulatory Coverage

- Guidance Document
- Training Video

How to Upload Existing Sewer System Management Plan in CIWQS

- Guidance Document
- Training Video

How to Register for a Legally Responsible Official User Account in CIWQS

- Guidance Document
- Training Video

How to Submit and Certify an Annual Report including System Performance Analysis Graphs in CIWQS

- Guidance Document

4. Preparing for inspectors

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- Statewide Sanitary Sewer Systems General Order – Effective June 5, 2023

Quick Links

- Electronic Sanitary Sewer System Service Area Boundary Map Specifications
- Sewer System Management Plan and Program Audit Due Dates Lookup (search by WQID number)

On the right side of the page, there are three sections:

- Subscribe to our Email Lists**
 - Subscribe to our email lists under the "Water Quality" topics.
- Contacts**

General Inquiries:

 - SanitarySewer@waterboards.ca.gov
- General Order Compliance Tools**
 - Statewide Sanitary Sewer Systems General Order (2022-0103-DWQ) Overview**
 - Training Video
 - How to Continue Existing Regulatory Coverage**
 - Guidance Document
 - Training Video
 - How to Upload Existing Sewer System Management Plan in CIWQS**



Historical Information

- Enrollees User Guide
- Sanitary Sewer Overflow Reduction Program Library
- Sewer System Management Plan Development Guide
- Previous State Water Board Staff Workshops
- Order 2006-0003-DWQ Review and Update
- Order 2006-0003-DWQ and 2013 Monitoring and Reporting Program
- Sanitary Sewer Overflow Compliance & Enforcement Information Annual Compliance Report
- Sewer System Management Plan Development/Implementation
- The California Water Board's Annual Performance Report - Fiscal Year 2014-15
- The California Water Board's Annual Performance Report - Fiscal Year 2015-16

4. Preparing for inspectors

Review Compliance Info!

Compliance and Enforcement

Enforcement Policy

- Enforcement Policy Overview Presentation
- Water Quality Enforcement Policy

Inspection Reports

- Oroville Audit
- Redding Audit
- Alhambra Inspection
- Placerville Inspection
- National City Inspection
- Oxnard Inspection
- Santa Margarita Water District Inspection

Notice of Violation and 13267 Orders

- City of Compton
- Inglewood NOV Part 1
- Inglewood NOV Part 2
- Santa Monica
- Whittier
- Glendale
- National City
- Alhambra 2012
- Escondido
- Groveland

Administrative Civil Liability Cases

- SSO Volume Determination
- Cambria
- Santa Cruz
- Costa Mesa Brief
- Costa Mesa
- Escondido
- South San Luis Obispo
- Maywood
- San Bernardino Chino Airport

Enforcement Referrals

- Alhambra 2013
- Alhambra 2015
- Alhambra Resolution
- Compton

Historical Information

- Enrollees User Guide
- Sanitary Sewer Overflow Reduction Program Library
- Sewer System Management Plan Development Guide
- Previous State Water Board Staff Workshops
- Order 2006-0003-DWQ Review and Update
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- Sewer System Management Plan Development/Implementation
- The California Water Board's Annual Performance Report - Fiscal Year 2014-15
- The California Water Board's Annual Performance Report - Fiscal Year 2015-16

4. Preparing for inspectors

Complete Pre-Inspection Questionnaire (see Spec. 6.4.2)

6.4. Entry and Inspection

6.4.1. Entry and Availability of Information

The Enrollee shall allow State and Regional Water Board staff, upon presentation of credentials and other documents as may be required by law, to:

- Enter upon the Enrollee’s premises where a regulated facility or activity is located or conducted, or where records are kept under the requirements of this General Order;
- Have access to and reproduce any records required to be maintained by this General Order;
- Inspect any facility and/or equipment (including monitoring and control equipment), practices, or operations required in this General Order; and
- Sample or monitor substances or parameters for assuring compliance with this General Order, or as otherwise authorized by the Water Code.

6.4.2. Pre-Inspection Questionnaire

The Enrollee shall provide pre-inspection information to State and Regional Water Board staff through the completion of a Pre-Inspection Questionnaire provided by Water Board staff.

STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER

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4. Preparing for inspectors

Assess Provisions (section 6)

6.1.6. Water Boards' Considerations for Discretionary Enforcement

Consistent with the State Water Board Enforcement Policy, when considering Water Code section 13327 factors, the State Water Board or a Regional Water Board may consider the Enrollee's efforts to contain, control, clean up, and mitigate spills. In assessing the factors, the State Water Board or the applicable Regional Water Board will consider:

ORDER 2022-0103-DWQ

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December 6, 2022

STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER	
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4. Preparing for inspectors

Assess Provisions (section 6)

- The Enrollee’s compliance with this General Order with a focus on compliance with reporting requirements;
- The Enrollee’s provision of adequate funding to implement the requirements of this General Order;
- The Enrollee’s compliance with providing a complete and updated Sewer System Management Plan;
- The Enrollee’s compliance with implementing its Sewer System Management Plan;

STATEWIDE SANITARY SEWER SYSTEMS GENERAL ORDER

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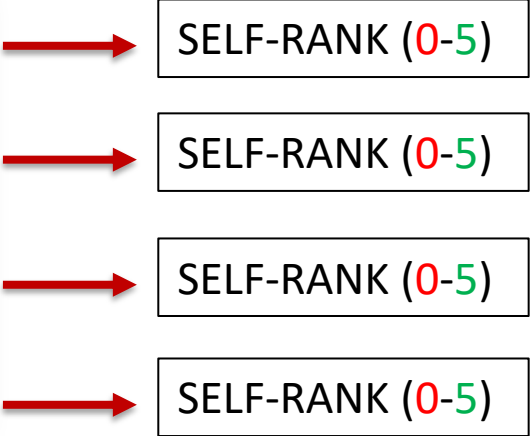
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4. Preparing for inspectors

Assess Provisions (section 6)

- The Enrollee's compliance with this General Order with a focus on compliance with reporting requirements;
- The Enrollee's provision of adequate funding to implement the requirements of this General Order;
- The Enrollee's compliance with providing a complete and updated Sewer System Management Plan;
- The Enrollee's compliance with implementing its Sewer System Management Plan;



4. Preparing for inspectors

Assess Provisions (section 6)

- The overall effectiveness of the Enrollee’s Sewer System Management Plan with respect to:
 - System management, operation, and maintenance,
 - Adequate treatment facilities, sanitary sewer system facilities, and/or components with an appropriate design capacity, to reasonably prevent spills (e.g. adequately enlarging treatment or collection facilities to accommodate growth, infiltration and inflow, etc.),
 - Preventive maintenance (including cleaning, root grinding, and fats, oils, and grease control) and source control measures,
 - Implementation of backup equipment,
 - Inflow and infiltration prevention and control,
 - Appropriate sanitary sewer system capacity to prevent spills, and
 - The Enrollee’s responsiveness to stop and mitigate the impact of the discharge;



4. Preparing for inspectors

Assess Provisions (section 6)

- The Enrollee’s compliance with identifying the cause of the spill;
- The Enrollee’s use of available information and observations to accurately estimate the spill volume and identify the affected or potentially affected receiving waters;
- The Enrollee’s thoroughness of cleaning up sewage in drainage conveyance systems after the spill(s);
- The Enrollee’s use of water quality and biological monitoring and assessment to determine the short-term and long-term impacts to beneficial uses and the environment;
- The Enrollee’s follow up actions to improve system performance;



4. Preparing for inspectors

Assess Provisions (section 6)

- The Enrollee’s implementation of feasible alternatives to prevent spills, such as:
 - Use of temporary storage or waste retention,
 - Reduction of system inflow and infiltration,
 - Collection and hauling of waste to a treatment facility,
 - Prevention of and/ or containment of spills due to a design storm event identified in the Enrollee’s Sewer System Management Plan,

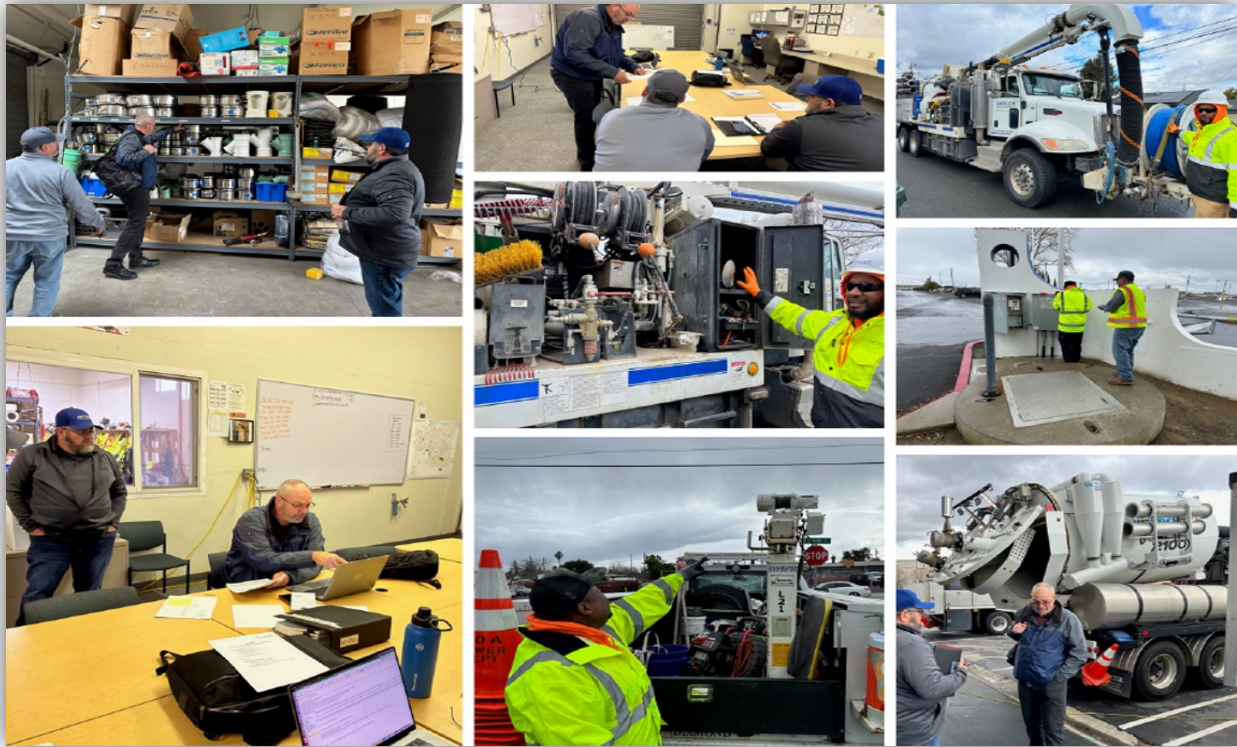
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- Implementation of available equipment, technologies, strategies, and recommended industry practices for maintaining and managing sewer systems to prevent spills, and contain and eliminate discharges to waters of the State; and
- The spill duration and factors beyond the reasonable control of the Enrollee causing the event.

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5. Conclusions

Best Practice Tips



5/22/2024 (SASD)

5. Conclusions

Best Practice Tips (General Compliance)

Reissued WDR Compliance Checklist (2024-2026)			
Target Date	Due Date	Action Items (CY2024-2025)	Completion Date
Jan 2024	Due FEB 1, 2024	Cat 4 / Non-Cat 1 Laterals Spills (<50 gallons)	<input type="checkbox"/> _____
March 2024	Due APRIL 1, 2024	SERP (review/update prior to completing Annual Report)	<input type="checkbox"/> _____
March 2024	Due APRIL 1, 2024	Annual Report (draft/final/ upload by LRO)	<input type="checkbox"/> _____
May 2024	Due JUNE 5, 2024	SERP (annual review/assess effectiveness/update)	<input type="checkbox"/> _____
2024	Check SWRCB Website with WDID	SSMP 3-Year Audit (initiate audit/draft report)	<input type="checkbox"/> _____
2024/2025	Check SWRCB Website with WDID	SSMP 3-Year Audit (final report/certify/upload by LRO)	<input type="checkbox"/> _____
2025/2026	Check SWRCB Website with WDID	2025 SSMP Update (initiate review/draft new SSMP)	<input type="checkbox"/> _____
2025/2026	Check SWRCB Website with WDID	2025 SSMP Update (final report/certify/upload by LRO)	<input type="checkbox"/> _____
Jan 2025	Due FEB 1, 2025	Cat 4 / non-Cat 1 Laterals Spills (<50 gallons)	<input type="checkbox"/> _____
March 2025	Due APRIL 1, 2025	SERP (review/update prior to completing Annual Report)	<input type="checkbox"/> _____
March 2025	Due APRIL 1 2025	Annual Report (draft/final/ upload by LRO)	<input type="checkbox"/> _____
May 2025	Due JUNE 5, 2025	SERP Annual Review/assess effectiveness/update	<input type="checkbox"/> _____

5/22/2024 (SASD)

5. Conclusions

Best Practice Tips (Resilience Example)

Compliance



Requirement 1 above: Based on its historic spill performance since 2007, the District does not routinely experience capacity-related sewage spills during dry/wet weather not has historically identified specific wet weather events causing or contributing to spill events and will continue to monitor all collection system spill events for deficiencies adjust this element as necessary. No major capacity enhancement measures are programmed at this time.



Requirement 2 above: The District has established a matrix for identifying potential risks and threats for spills based on site-specific conditions and historic review of spill events and causes from its sewer system (see Figure 7 below).



System Resilience: The District has identified through its urban water management plan (2020) several potential Effects of Climate Change. In the 2013 during its update of the [DWR California Water Plan for the District](#), the implications of future climate conditions are evaluated. These changing hydrological conditions could affect future planning efforts, which are typically based on historic conditions. The California Water Plan identifies the following probable impacts due to changes in temperature and precipitation, most of which will apply to RCSD:

- (a) More winter runoff and less spring/summer runoff due to warmer temperatures.
- (b) Greater extremes in flooding and droughts.
- (c) Greater water demand for irrigation and landscape water due to increased

5. Conclusions

Best Practice Tips (Documentation)

Certified Spill Report for Category 1 Spills

Spill Event ID:	891368	Spill Location Name:	1580 Galen Dr.
Sanitary Sewer System:	City of Laguna Beach CS	Agency:	Laguna Beach City
Spill Report Type:	Category 1 Spill	Spill Report Status:	Certified
Initial Draft Submitted On:	11/29/2023	Certified On:	02/02/2024
Spill Report Version Number:	2.2		

File Name	File Description	Uploaded Date	Status
891368_Version_2.2.pdf	Certified spill pdf : 891368_Version_2.2.pdf	2024-02-02	OK
Outfall_11.jpg	Dam Bluebird Canyon's outfall captured a large portion of the spill.	2023-12-04	OK
IMG_E8438.JPG	Spill Location	2023-12-04	OK
891368_Version_1.4.pdf	Certified spill pdf : 891368_Version_1.4.pdf	2023-11-30	OK
Bluebird outfall Spill 11292023.jpg	Spill access point.	2023-11-30	OK

Spill Report General Information	
1. Name of Enrollee contact person to respond to spill-specific questions:	Jason Walker
1.a. Telephone number of Enrollee contact person to respond to spill-specific questions:	(949) 464-6634
2. Spill Location Name:	1580 Galen Dr.
3. Date and time the Enrollee was notified of, or self-discovered, the spill:	11/29/2023 00:12
4. Operator arrival time:	11/29/2023 00:12
5. Estimated spill start date and time:	11/29/2023 00:12
6. Date and time the Enrollee notified the California Office of Emergency Services:	11/29/2023 08:20
6.a. Assigned control number:	23-7333
7. Description, photographs, and GPS coordinates of the system location where the spill originated: 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:	A broken valve on a force main.
7.a. Latitude:	33.5306
7.b. Longitude:	-117.77256
7.c. Appearance points:	Force Main, Other (specify below)
7.d. If other, describe:	Valve on forcemain
7.e. Additional spill appearance point(s) explanation:	N/A
8. Estimated total spill volume exiting the system:	152705
9. Description and photographs of the extent of the spill and spill boundaries:	Exiting manhole #G21-005 flowed down Galen Dr. to the storm drain located at the end of street. Flowing out to the Ocean via the Bluebird Outfall.
10. Did the spill reach a drainage conveyance system?:	Y

5. Conclusions

Best Practice Tips (Documentation)

1.k. Longitude:	
2. Spill end date and time:	11/29/2023 07:20
3. Description of how the spill volume estimations were calculated, including at a minimum: 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):	Considering the 2" orifice in the pipe, the water was exiting at 19 psi. for the duration of the spill, the recovery consisted of the pumping of the water behind the dam at Bluebird Canyon Beach @ 200 gallons a minute for 5 hours and the 7 times the vacuumed trucks were dumped, holding 1900 gallons.
3.a. Description of the methodology(ies), assumptions and type of data relied upon for estimations of the spill start time and the spill end time:	City staff was at the location when the spill occurred and when the repair was complete.
4. Spill cause(s):	Collection System Maintenance Failure (specify below)
4.a. If other, describe:	Scheduled removal of a 2" corroded ball valve was the cause of the spill. When the strap and valve were removed, the head pressure overwhelmed the workers.
5. System failure location:	Force Main, Manhole
5.a. If other, describe:	
6. Description of the pipe material, at the failure location:	Concrete
6.a. If other, describe:	
6b. Estimated age of pipe material, at the failure location:	50
7. Description of the impact of the spill:	The impact of the spill consisted of entering the beach waters and causing higher than normal bacteria samples.
8. Was the spill associated with a storm event?	N
9. Spill response activities:	Mitigated Effects of Spill (specify below), Contained All or Portion of Spill, Other Enforcement Agency Notified, Returned Portion of Spill to Sanitary Sewer System, Cleaned Up (specify below)
9.a. If other, describe:	With construction ongoing at the outfall located at Bluebird Canyon beach, a dam was built, thus capturing a portion of the spill before it hit the beach.
9.b. Description of spill response activities including description of immediate spill containment and cleanup efforts:	City staff was at the location when the spill started till the repair was complete. The city attempted to alleviate the Impact by vacuuming as much of the spill as possible.
10. Spill corrective action:	Repaired Facilities or Replaced Defect
10.a. If other, describe:	
10.b. 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:	No corrective action was taken as this was a scheduled removal of a 2" corroded ball valve was the cause of the spill.
10.c. Schedule of major milestones:	N/A
11. Spill response completion date:	11/29/2023
12. Detailed narrative of investigation and investigation findings of cause of spill:	Scheduled removal of a 2" corroded ball valve was the cause of the spill. When the strap and valve were removed, the head pressure overwhelmed expectations, causing the overflow.
13. Is the Enrollee conducting an ongoing investigation?	N
13.a. Reasons for an ongoing investigation:	
13.b. Expected date of completion of investigation:	
14. Name of receiving water body(s):	Pacific Ocean
14.a. Type of receiving water body(s):	Ocean

5. Conclusions

Best Practice Tips (Training/Drills)



5/22/2024 (SASD)

5. Conclusions

Best Practice Tips (Future Deadlines)

- Start SSMP Audits early (3-6 months to complete)!
- Focus on Auditing (vs. trying to update your SSMP!)
- Enter all key deadlines in OUTLOOK + CMMS!

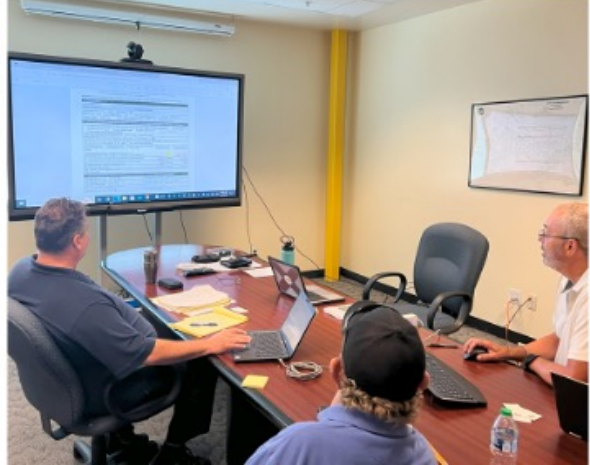
Best Practices for Expediting WDR Compliance



James Fischer, P.E.
Fischer Compliance LLC



Richard Cunningham
Fischer Compliance LLC



jim@fischercompliance.com

rc@sewers.com

5/22/2024 (SASD)

