

**CITY OF SEBASTOPOL CITY COUNCIL****AGENDA ITEM REPORT FOR MEETING OF: September 15, 2026**

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To: Honorable Mayor and City Councilmembers
From: Oriana Hart, Public Works Director
Department: Public Works
Subject: 2026 Sewer System Management Plan Update, Annual Report, and SSMP Audit Report

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RECOMMENDATIONS:

That the City Council:

1. Accept the 2026 Sewer System Management Plan Audit Report and authorize the Public Works Director, as the City's Legally Responsible Official, to certify and submit the Audit Report to the State Water Resources Control Board through the California Integrated Water Quality System; and
2. Adopt the 2026 Sewer System Management Plan by resolution and authorize the Public Works Director, as the City's Legally Responsible Official, to certify and submit the approved Plan to the State Water Resources Control Board through CIWQS.

PROCESS OF AGENDA ITEM:

If the item remains on the Consent Calendar, no presentation is required, and the item will be approved as part of the Consent Calendar. If the item is removed from the Consent Calendar, it will be heard as a regular agenda item and will proceed as follows:

- Presentation by staff
- Council questions and discussion
- Public comment
- Council deliberation and action

EXECUTIVE SUMMARY:

The purpose of this item is to bring the City's updated 2026 Sewer System Management Plan (SSMP) and associated 2026 SSMP Audit Report to the City Council for review and approval. The SSMP is the City's management and regulatory framework for operating and maintaining its sanitary sewer collection system. It establishes the City's policies, procedures, responsibilities, and programs for preventive maintenance, sanitary sewer overflow response, emergency response, condition assessment, asset management, system performance monitoring, and capital improvement planning. The SSMP is not the City's Sewer Master Plan. The SSMP establishes the overall management framework for the City's sewer system, while the separate Sewer Master Plan currently underway is a technical planning effort that evaluates the hydraulic capacity and physical condition of the sewer system and will identify and prioritize future infrastructure improvements. The Sewer Master Plan is expected to be completed in spring 2027 and will provide the technical basis for future Capital Improvement Program and investment decisions.

The 2026 SSMP update is required to reflect current State regulatory requirements and changes to the City's staffing, organization, operations and maintenance practices, asset management program, emergency response procedures, performance monitoring, and capital planning processes. The update also incorporates the City's ongoing annual sewer system performance reporting and the findings of the 2026 SSMP Audit. The State Water Resources Control Board's requirements call for sanitary sewer agencies to maintain and implement an SSMP, conduct periodic audits, and update the SSMP at least every six years. Following City Council approval, the City's Legally Responsible Official will certify and submit the updated SSMP and Audit Report to the State Water Resources Control Board through CIWQS.

In short, this item is the City's required update to its sewer management and regulatory document; it does not approve or replace the Sewer Master Plan that will return to Council in spring 2027.

**BACKGROUND:**

The City of Sebastopol owns and operates a sanitary sewer collection system serving the City's residents and businesses. The collection system includes approximately 30 miles of gravity sewer pipelines, force mains, manholes, pump stations, and associated infrastructure. Wastewater collected by the City is conveyed to the Santa Rosa Subregional Wastewater System for treatment. The City first adopted a Sewer System Management Plan (SSMP) in 2010 and subsequently updated the Plan in 2015 and 2020. Since the City's last SSMP update in 2020, the State Water Resources Control Board has adopted new statewide Waste Discharge Requirements (WDRs) for sanitary sewer systems. The updated requirements strengthen expectations for sewer system management, with greater emphasis on system condition assessment, preventive maintenance, capacity and performance evaluation, capital improvement planning, emergency response, performance monitoring, and continuous improvement. The new requirements also establish periodic SSMP audit and update requirements.

The 2026 SSMP update incorporates these regulatory changes and updates the City's Plan to reflect current staffing and organizational responsibilities, sewer operations and maintenance practices, asset management, emergency response procedures, system performance monitoring, and capital planning. The City also completed the required 2026 SSMP Audit, which evaluates implementation and effectiveness of the City's sewer management program and identifies areas for improvement. The SSMP serves as the City's overall management framework for operating, maintaining, evaluating, and improving its sanitary sewer collection system.

DISCUSSION:

The 2026 Sewer System Management Plan (SSMP) updates the City's existing sewer management program to meet the requirements of the State Water Resources Control Board's Statewide Sanitary Sewer Systems General Order, Order WQ 2022-0103-DWQ. The new WDR expanded the requirements for sanitary sewer agencies and places greater emphasis on documented system management, preventative maintenance, emergency preparedness, system condition and capacity, performance monitoring, and continuous improvement. The updated SSMP incorporates these requirements into the City's existing practices and establishes procedures for ongoing evaluation and periodic updates. The updated SSMP provides more specific documentation of how the City manages its approximately 30-mile collection system. It identifies current Public Works responsibilities for sewer operations and maintenance, establishes the City's legal authority and regulatory responsibilities, and documents procedures for routine and targeted sewer cleaning, CCTV inspection, manhole and pipeline condition assessment, pump station and force main maintenance, and repair and rehabilitation.

The City is also moving sewer asset information, inspection records, work orders, and maintenance history into its computerized maintenance management and asset management systems. This allows the City to better track the condition and maintenance history of individual assets, schedule preventive maintenance, identify recurring problems, and use that information when developing future capital projects. The new WDR also requires agencies to demonstrate that they are evaluating their systems and using available information to identify deficiencies and prioritize improvements. The City's SSMP establishes this connection between operations, condition assessment, performance monitoring, and capital planning. Sewer deficiencies identified through maintenance activities, CCTV inspections, operational experience, and system evaluations are used to identify rehabilitation and replacement needs. The City's annual performance review also tracks sanitary sewer overflows and related information, including the number and causes of SSOs, locations, spill volumes, recovered sewage, and whether a spill reaches surface water. This information is reported annually to the City Council and is used to evaluate the effectiveness of the City's sewer management program.

The City is also expanding its ability to collect system performance information. As part of this effort, the City is installing SmartCover monitoring devices at selected manholes. These devices provide continuous information on sewer levels and can alert staff to unusual conditions or potential surcharge events. The information will give staff another tool for identifying areas that may warrant additional investigation, including potential inflow and infiltration, and can be considered along with CCTV, maintenance records, and other system information when prioritizing work.



The SmartCover installations are one component of the City's broader effort to improve sewer system monitoring and asset management. The updated SSMP also incorporates the City's requirements for responding to sanitary sewer overflows. The Plan establishes the City's response procedures for containing and recovering spills, protecting public health and water quality, notifying appropriate regulatory agencies, and completing required reporting. It also documents emergency response responsibilities and procedures for maintaining sewer service during emergencies, including coordination among Public Works staff and other responding agencies. These procedures are intended to provide a consistent response while allowing the City to use information from each incident to identify potential system or program improvements.

The 2026 SSMP Audit was completed in conjunction with the update and provides an independent review of the City's implementation of the SSMP and compliance with the new WDR. The audit found that the City is generally implementing its sewer management program in accordance with the requirements, with the majority of evaluated elements rated as compliant. The audit identified three areas as Marginal Compliance, which are being addressed through the City's ongoing work. The first finding concerns construction inspection requirements. The audit found that the City's existing Standards do not specifically establish construction inspection requirements. In practice, the City addresses inspection through project-specific construction notes and details and through requirements included in encroachment permits. The updated SSMP documents these existing practices, and the City will address the remaining gap through a future update to the City's Standards. The other two findings are related to system capacity and capital improvement planning. The audit identified the need for the City to update its evaluation of hydraulic capacity and use that information to inform capital planning. The City is currently undertaking this work through its Sewer Master Plan, which is evaluating both system capacity and condition and will provide recommendations to inform the City's FY 2027/28 Capital Improvement Program. This work will address the capacity-related items identified in the audit and provide the technical information needed to further develop the City's long-term sewer capital program. The audit findings have been incorporated into the 2026 SSMP where appropriate, and the Plan includes a change log documenting the revisions. The SSMP also establishes the City's ongoing process for reviewing annual performance information, conducting periodic audits, identifying deficiencies, and making adjustments to its sewer management program.

Recent SSO data demonstrates the City's current collection system performance. From 2021 through 2025, the City experienced four sanitary sewer overflows, with one occurring in 2024 that reached surface water.

Table 1 – Summary of Recent Sanitary Sewer Overflows

Year	Total SSOs	SSOs Reaching Surface Water
2021	1	0
2022	1	0
2023	0	0
2024	1	1
2025	1	0

STAFF ANALYSIS:

Staff recommends approval of the 2026 Sewer System Management Plan because the updated Plan provides a current framework for how the City manages, operates, maintains, evaluates, and improves its sanitary sewer collection system. The 2026 update reflects the City's current sewer infrastructure, staffing, maintenance practices, asset management efforts, capital improvement planning, emergency response procedures, and system performance monitoring. It also incorporates changes to the City's sewer management program since the previous SSMP was adopted in 2020.



The City's Sewer System Master Plan Update is an important companion effort to the SSMP. The Master Plan is currently incorporating the City's most recent pipe condition assessment and inspection data into the City's hydraulic model. The hydraulic model has now been calibrated using the City's updated system data, and the project is moving into development of a prioritized capital improvement project list. This work directly supports implementation of the SSMP. The SSMP establishes the City's overall framework for operating and maintaining the collection system, while the Sewer Master Plan provides the technical analysis needed to determine where capital investment is most needed and which improvements should be prioritized. Bringing the current condition data and hydraulic modeling together allows the City to move from identifying deficiencies to developing a prioritized program for rehabilitation, replacement, and capacity improvements.

The updated SSMP establishes the City's management and maintenance framework, while the Sewer Master Plan is developing the technical basis for the City's longer-term infrastructure investment. The resulting priority project list can be incorporated into the City's Capital Improvement Program and used to guide future budgeting, rate planning, rehabilitation, and replacement decisions. The SSMP Audit provides an additional review of the City's implementation of the Plan and identifies areas where practices, documentation, or program elements may be improved. Using the audit process to identify and address these items allows the SSMP to function as an ongoing management tool rather than simply a regulatory document.

Together, the SSMP, SSMP Audit, condition assessment data, hydraulic model, and Sewer Master Plan provide the City with a more comprehensive basis for managing the wastewater collection system. Approval of the updated SSMP and acceptance of the Audit Report will allow the City to complete the current SSMP update while continuing to use the Sewer Master Plan to translate current system information into a prioritized and implementable capital improvement program.

CITY COUNCIL GOALS/PRIORITIES/AND OR GENERAL PLAN CONSISTENCY:

This agenda item represents the City Council goals/priorities as follows:

- Goal 3 – Infrastructure. Maintaining high quality infrastructure, facilities and services includes repairing/ replacing outdated city facilities, improving streets, stormwater and wastewater infrastructure.

This agenda item represents the City Council General Plan Consistency (if applicable):

- Circulation CIR 1-11: Provide high quality regular maintenance for existing and future transportation facilities including streets, sidewalk, and paths.

PUBLIC COMMENT:

This agenda item has been noticed in accordance with the Ralph M. Brown Act and was available for public viewing and review at least 72 hours prior to the scheduled meeting date.

COMMUNITY OUTREACH:

This item has been noticed in accordance with the Ralph M. Brown Act and was available for public viewing and review at least 72 hours prior to the scheduled meeting date. As of the writing of this staff report, the City has not received any public comment on this item. However, if staff receives public comment from interested parties following the publication and distribution of this staff report, such comments will be provided to the City Council as supplemental materials before or at the meeting. In addition, public comments may be offered during the public comment portion of this item.

FISCAL IMPACT:

There is no direct fiscal impact associated with adoption of the 2026 Sewer System Management Plan or acceptance of the 2026 SSMP Audit Report. Approval of these documents does not authorize any new expenditures or appropriations. The activities documented in the SSMP, including routine sewer operations and maintenance, condition assessment, emergency response, asset management, and capital improvement planning, are funded through the City's Wastewater Enterprise Fund and existing budget appropriations.



RESTATED RECOMMENDATION:

That the City Council accept the 2026 Sewer System Management Plan Audit Report and authorize the Public Works Director to certify and submit the Audit Report to the State Water Resources Control Board through CIWQS; and adopt the 2026 Sewer System Management Plan by resolution and authorize the Public Works Director to certify and submit the approved Plan to the State Water Resources Control Board through CIWQS.

CITY COUNCIL OPTION(S):

1. Approve the staff recommendation to accept the 2026 Sewer System Management Plan Audit Report and adopt the 2026 Sewer System Management Plan.
2. Approve the staff recommendation with modifications and provide direction to staff regarding revisions to the 2026 SSMP or Audit Report.
3. Continue the item to a future City Council meeting and direct staff to make additional revisions or provide additional information.
4. Provide other direction to staff regarding the City's Sewer System Management Plan and Audit Report.

ATTACHMENT(S):

- 1 – Resolution
- 2 – 2026 SSMP Update
- 3 – Audit Report for 2026 SSMP
- 4– Annual Report Data CY 2025

APPROVALS:

Department Head Approval:	Approval Date: 9/8/26
CEQA Determination (Planning):	Approval Date: 9/8/26
Administrative Services (Financial)	Approval Date: 9/8/26
Costs authorized in City Approved Budget:	☒ Yes ☐ No ☐ N/A
Account Code (If applicable)	Funds 510
City Attorney Approval:	Approval Date: 9/8/26
City Manager Approval:	Approval Date: 9/8/26

CITY OF SEBASTOPOL
RESOLUTION NO. XXXX-2026

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SEBASTOPOL APPROVING AND ADOPTING THE 2026
UPDATED SEWER SYSTEM MANAGEMENT PLAN AND AUTHORIZING CERTIFICATION AND SUBMITTAL TO THE
STATE WATER RESOURCES CONTROL BOARD

WHEREAS, the City of Sebastopol owns and operates a sanitary sewer collection system serving the City's residents and businesses; and

WHEREAS, the State Water Resources Control Board ("State Water Board") adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order WQ 2022-0103-DWQ ("WDR"), which establishes requirements for the operation, maintenance, management, monitoring, and reporting of publicly owned sanitary sewer collection systems; and

WHEREAS, the WDR requires covered sanitary sewer agencies to develop, maintain, implement, and periodically update a Sewer System Management Plan ("SSMP") addressing the required elements of the WDR; and

WHEREAS, the City's SSMP establishes the City's framework for managing its sanitary sewer collection system, including organizational responsibilities, legal authority, operations and maintenance, design and performance provisions, spill emergency response, fats, oils and grease and source control, system evaluation and capacity assurance, monitoring and performance measurement, program audits, and communication; and

WHEREAS, the City has prepared an updated 2026 Sewer System Management Plan to incorporate the requirements of Order WQ 2022-0103-DWQ and reflect the City's current staffing, organizational structure, operations and maintenance practices, asset management program, emergency response procedures, performance monitoring, and capital planning processes; and

WHEREAS, the City completed a 2026 SSMP Audit as part of the required periodic review of the City's sewer management program, which evaluated implementation of the SSMP, regulatory compliance, and opportunities for improvement; and

WHEREAS, the 2026 SSMP Audit found that the City's sewer management program generally complies with the applicable requirements, with the majority of audit criteria rated "Complies," and identified three areas of Marginal Compliance related to construction inspection requirements, system capacity evaluation, and capital improvement planning; and

WHEREAS, the updated 2026 SSMP incorporates the applicable audit findings and establishes a process for continued review and improvement of the City's sewer management program; and

WHEREAS, the City is addressing the remaining audit findings through ongoing work, including updates to construction standards and the City's ongoing Sewer Master Plan and capital improvement planning processes; and

WHEREAS, the City Council has reviewed the 2026 Sewer System Management Plan and the 2026 SSMP Audit and finds that adoption of the updated SSMP is in the best interest of the City and is necessary to maintain compliance with the State Water Board's requirements.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Sebastopol as follows:

1. The City Council hereby approves and adopts the 2026 Sewer System Management Plan as the City's current Sewer System Management Plan for its sanitary sewer collection system. The 2026 Sewer System Management Plan supersedes and replaces the City's previously adopted Sewer System Management Plan.
2. The City Council hereby accepts the 2026 Sewer System Management Plan Audit Report, including the findings and identified areas for continued improvement.
3. The City Council authorizes the City's Legally Responsible Official to certify and submit the 2026 Sewer System Management Plan and 2026 Sewer System Management Plan Audit Report to the State Water Resources Control Board through CIWQS, and to take such administrative actions as are necessary to implement the updated SSMP and maintain compliance with Order WQ 2022-0103-DWQ.
4. This Resolution shall take effect immediately upon its adoption.

I, the undersigned, hereby certify that the foregoing Resolution was duly adopted by the City of Sebastopol City Council by the following vote:

VOTE:

Ayes:

Noes:

Abstain:

Absent:

APPROVED:

Mayor Jill McLewis

ATTEST: _____

Mary Gourley, City Manager

APPROVED AS TO FORM:

Alex Mog, City Attorney



Sewer System Management Plan

July 2026

City WDID #1SSO10017

Originally Certified August 3, 2010

Resolution No: 5812

Readopted: March 17, 2015

Resolution No: 6031

Readopted: September 15, 2020

Resolution No: 6311-2020

Revised: July 15, 2026

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CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Oriana Hart, Public Works Director
Legally Responsible Official

Introduction

1.1. Sewer System Management Plan

The State Water Resources Control Board (SWRCB) has issued statewide Waste Discharge Requirements (WDRs) for sanitary sewer systems, which require the development and implementation of a Sewer System Management Plan (SSMP). These requirements are contained in Order No. WQ 2022-0103-DWQ, Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, adopted on December 6, 2022, and effective June 5, 2023, including the associated Monitoring and Reporting Program (MRP). This SSMP is intended to comply with the requirements of the current WDR and MRP. The City is also named in the Santa Rosa Subregional Water Reclamation Facility National Pollutant Discharge Elimination System (NPDES) Permit No. CA0022764, issued pursuant to Regional Water Quality Control Board Order No. R1-2013-0001.

The structure (section numbering and nomenclature) of this SSMP follows the requirements of Section D of Order No. WQ 2022-0103-DWQ. This SSMP is organized in accordance with the SWRCB-required SSMP elements and includes applicable language from the WDR where appropriate. The WDR uses the term "Enrollee" to refer to each public agency operating a sanitary sewer system that is covered under the General Order. For purposes of this SSMP, the Enrollee is the City of Sebastopol. The City's Waste Discharge Identification Number (WDID) in the California Integrated Water Quality System (CIWQS) is 1SSO10017. The City shall report and certify sanitary sewer overflows (SSOs) in accordance with the requirements of the current WDR and MRP using this WDID.

1.2. Sanitary Sewer System Facilities

The City operates a sanitary sewer system that serves an estimated population of 7,768 as of 2020 in a 4.4 square mile service area. The sewer system serves 2,754 service connections. The sewer system consists of 29.6 miles of gravity sewers (approximately 750-line segments), 750 manholes, 2.7 miles of force mains, and two (2) pump station as of March 2020. The sewer lines range in size from six (6) inches to twenty-one (21) inches in diameter. The City is a member of the Santa Rosa Subregional Sewerage System that is responsible for the conveyance, treatment and disposal of all sewage discharged into the City of Sebastopol sewer system. The City is responsible for the lower laterals connecting to the City sewer system from the property line to the City main (10.5 miles) and the property owner is fully responsible for installation, maintenance and repair of the private upper sewer lateral(s) from the structure to the lower lateral. The City provides service and repair of the lower lateral (the portion of the lateral that extends from the sewer main in the public right-of-way to the clean out at the property line/edge of the right-of-way or for easements to the easement line). The property owner is responsible for installation, maintenance, operation, inspection, testing, rehabilitation, and repair of the upper lateral that extends from the clean out at the property line/edge of right-of-way or from the easement edge to the building. The City Council may, in the future, consider requirements for the

testing and repair of laterals for purposes of reducing infiltration and inflow. Figure 1 contains a map of the City's sanitary sewer system. The composition of the sewer piping by size, material and pipe age of construction is shown on Tables 1, 2 and 3.

Intro Figure 1 provides a map of City's sanitary sewer service area. **Intro Table 1** lists the size distribution of the gravity sewer pipes in the City sewer system.

Intro Table 2 provides the gravity sewer pipes material of construction.

Intro Table 3 provides the system information of Gravity Sewer System Inventory of Sewer Lines by Pipe Age.

Intro Figure 1: City Sewer System Area Map



Intro Table 1: Gravity Sewer System Size Distribution

Diameter, Inches	Number of Line Segments	Pipe Length, Linear Feet	Portion of Sewer System, %
6	340	102,030	65.3

Diameter, Inches	Number of Line Segments	Pipe Length, Linear Feet	Portion of Sewer System, %
8	81	24,365	15.6
10	40	11,983	7.7
12	22	6,627	4.2
14	11	3,201	2.1
15	5	1,424	0.9
16	3	868	0.6
18	1	108	0.1
21	5	1,428	0.9
Unknown	15**	4,277	2.7
Total	523	156,311	100.0
Total, miles		29.6	100.0

Intro Table 2: Gravity Sewer System Materials of Construction

Material	Number of Line Segments	Pipe Length, LF	Percent of Sewer System
VCP	106	31,726	20.3
PVC	13	3,804	2.4
DIP	349	104,751	67.0
ACP	39	11,753	7.5
Unknown	15**	4,277	2.7
Total	523	156,311	100.00
Total, Miles		29.6	

Intro Table 3: Gravity Sewer System Inventory of Sewer Lines by Pipe Age

Age in Years	Construction Period	Linear Feet of Gravity Sewers	Miles of Gravity Sewer	Percent of System
0-15	2000 - current	7,814	1.48	5
16 – 35	1980 – 1999	31,258	5.92	20
36 – 55	1960 – 1979	78,144	14.8	50
56 – 75	1940 – 1959	31,258	5.92	20
76 – 95	1920 – 1939	7,814	1.48	5
95 – 115	1900 – 1919	0	0	0
>115	Before 1900	0	0	0
Total		156,288	29.6	

1.3. Definitions, Acronyms, and Abbreviations

Asbestos Cement Pipe (ACP)

American Society for Testing and Materials (ASTM)

American Water Works Association (AWWA)

Best Management Practices (BMP)

Refers to the procedures employed in commercial kitchens to minimize the quantity of grease that is discharged to the sanitary sewer system. Examples include scraping food scraps into a garbage can and dry wiping dishes and utensils prior to washing.

Building Lateral

Refers to the piping (upper and lower lateral) that conveys sewage from the building to the City sewer system.

Calendar Year (CY)

Capital Improvement Plan (CIP)

Refers to the document that identifies future capital improvements to City's sanitary sewer system.

California Integrated Water Quality System (CIWQS)

Refers to the State Water Resources Control Board online electronic reporting system that is used to report SSOs, certify completion of the SSMP, and provide information on the sanitary sewer system.

Capital Improvement Plan (CIP)

Refers to the document that identifies future capital improvements including renewal and replacement and capacity enhancements to the City's sanitary sewer system.

City

Refers to the City of Sebastopol

City Clean Out

Refers to the clean out that is typically located on the building lateral near the sidewalk (lower lateral) or at the edge of the City right-of-way. The City clean out is used to provide access for City crews to provide courtesy maintenance to the lower lateral. Not all buildings in the City have a City clean out.

Clean Water Act (CWA)

California Water Environment Association (CWEA)

Closed Circuit Television (CCTV)

Refers to the process and equipment that is used to internally inspect the condition of gravity sewers.

Computerized Maintenance Management System (CMMS)

Refers to the computerized maintenance management system that is used by City to plan, dispatch, and record the work on its sanitary sewer system. CivicPlus is the propriety software City uses for workflow management.

Director of Utilities

Means the person at the City of Santa Rosa Subregional Water Reclamation System responsible for the administration and enforcement of the City FOG and industrial waste program.

Division of Water Quality (DWQ)

Refers to the State of California Division of Water Quality of the State Water Resources Control Board.

Ductile Iron Pipe (DIP)**Enforcement Response Plan (ERP)**

Plan for the enforcement of pretreatment program of the City of Santa Rosa Environmental Compliance Division.

Enrollee

A federal or state agency, municipality, county, district, and other public entity that owns or operates a sanitary sewer system, as defined in the general GWDRs, and that has submitted a complete and approved application for coverage under the GGWDR

Fats, Roots, Oils, and Grease (FOG)

Refers to fats, oils, and grease typically associated with food preparation and cooking activities that can cause blockages in the sanitary sewer system.

Feet per sec (fps)**First Responder**

Refers to the field crew or the On-Call personnel that are City's initial response to an SSO event or another sewer system emergency.

Fiscal Year (FY)

Means a 12-month periods beginning July 1st and ending June 30th.

Food Service Establishment (FSE)

Refers to commercial or industrial facilities where food is handled/prepared/served that discharge to the sanitary sewer system.

Full-time Equivalent (FTE)

Refers to the equivalent of 2,080 paid labor hours per year by a regular, temporary, or contract employee.

Gallons per Day (GPD)**Grease Removal Device (GRD)**

Refers to grease traps and grease interceptors that are installed to remove FOG from the wastewater flow at food service establishments.

General Waste Discharge Requirements (GWDR)

Refers to the State Water Resources Control Board Order No. 2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, dated 5/2/2006.

Geographical Information System (GIS)

Refers to City's system that it uses to capture, store, analyze, and manage geospatial data associated with City's sanitary sewer system assets.

Global Positioning System (GPS)

Refers to a field device that is recommended to determine the longitude and latitude of sanitary sewer overflows for use in meeting CIWQS reporting requirements.

Grease Removal Device (GRD)

Refers to grease traps and grease interceptors that are installed to remove FOG from the wastewater flow at food service establishments.

Infiltration/Inflow (I/I)

Refers to water that enters the sanitary sewer system from storm water and groundwater.

- Infiltration enters through defects in the sanitary sewer system after flowing through the soil.
- Inflow enters the sanitary sewer without flowing through the soil. Typical points of inflow are holes in manhole lids and direct connections to the sanitary sewer (e.g. storm drains, area drains, and roof leaders).

Lateral

See Building Lateral

Legally Responsible Official (LRO)

Person(s) formally designated by City to be responsible for formal reporting and certifying of all reports submitted to the CIWQS.

Lower Lateral

That portion of the sewer lateral from the main to the private property line or cleanout at the street or for easement lines from the edge of the easement to the City sewer system

Maintenance Management System (MMS)

See computerized maintenance management system.

Manhole (MH)

Refers to an engineered structure that is intended to provide access to a sanitary sewer for maintenance and inspection.

Mainline Sewer

Refers to City publicly owned wastewater collection system piping that is not a private lateral connection to a user.

Monitoring, Measurement, and Plan Modifications (MMPM), SSMP Element IX**Monitoring and Reporting Program (MRP)**

State Water Resources Control Board WQ 2013-0058-EXEC effective September 9, 2013.

National Association of Sewer Service Companies (NASSCO)**Notification of an SSO**

Refers to the time at which City becomes aware of an SSO event through observation or notification by the public or other source.

Nuisance

California Water Code section 13050, subdivision (m), defines nuisance as anything that meets all the following requirements:

- a. Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
- b. Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
- c. Occurs during, or as a result of, the treatment or disposal of wastes.

Office of Emergency Services (OES or Cal OES)

Refers to the California State Office of Emergency Services.

Operations and Maintenance (O&M)**Pipeline Assessment and Certification Program (PACP)**

Refers to the NASSCO certification program that is used for the evaluation and condition assessment of sewer lines and appurtenances from closed circuit televising of the lines and appurtenances.

Polyvinylchloride Pipe (PVC)**Preventive Maintenance (PM)**

Refers to maintenance activities intended to prevent failures of the sanitary sewer system facilities (e.g., cleaning, CCTV, repair, etc.).

Private Lateral (PSL)

The sewer pipeline from the plumbing of a building to the property line, or cleanout to the building or for easements from the edge of the sewer easement to the building.

Private Lateral Sewage Discharges (PLSD)

Sewage discharges that are caused by blockages or other problems within a privately-owned sewer service lateral.

Property Damage Overflow

Refers to a sewer overflow or backup that damages a private property owner's premises.

Public Works (PW)**Pump Station (PS)****Regional Water Quality Control Board (RWQCB)**

Refers to the North Coast Regional Water Quality Control Board.

Santa Rosa Subregional Water Reclamation System (SRSWRS)

Refers to the Subregional Water Reclamation Facility to which the Sebastopol wastewater is discharged for treatment and disposal. The staff of this agency is also responsible for the FOG and industrial waste program administration in the City service area.

Sanitary Sewer Backup (Backup)

A wastewater backup into a building and/or on private property caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.

Sanitary Sewer Overflows (SSO)

Any overflow, spill, release, discharge, or diversion of untreated or partially treated wastewater from a sanitary sewer system. SSOs include:

- a. Overflows or releases of untreated or partially treated wastewater that reach waters of the United States;
- b. Overflows or releases of untreated or partially treated wastewater that do not reach waters of the United States; and

- c. Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.
- d. SSOs that include multiple appearance points resulting from a single cause will be considered one SSO for documentation and reporting purposes in CIWQS.

NOTE: Wastewater backups into buildings caused by a blockage or other malfunction of a private sewer lateral are not SSOs.

SSO Categories:

Category 1: Discharge of untreated or partially treated wastewater of any volume from or caused by a sanitary sewer system that results in a discharge to:

- A surface water, including a surface water body that contains no flow or volume of water; or
- A drainage conveyance system that discharges to surface waters when the sewage is not fully captured and returned to the sanitary sewer system or otherwise properly disposed of.

Any spill volume not recovered from a drainage conveyance system is considered a discharge to surface water unless the drainage conveyance system discharges to a dedicated stormwater infiltration basin or facility.

Category 2: Discharge of untreated or partially treated wastewater equal to or greater than 1,000 gallons from or caused by a sanitary sewer system that does not discharge to a surface water.

Category 3: Discharge of untreated or partially treated wastewater equal to or greater than 50 gallons and less than 1,000 gallons from or caused by a sanitary sewer system that does not discharge to a surface water.

Category 4: Discharge of untreated or partially treated wastewater less than 50 gallons from or caused by a sanitary sewer system that does not discharge to a surface water.

Sanitary Sewer System or Sewer System

Referring to the sanitary sewer facilities that are owned and operated by the City

Spill Emergency Response Plan (SERP), Element VI of the SSMP and Appendix D

Sebastopol Municipal Code (SMC)

Sensitive Area

Refers to areas where an SSO could result in a fish kill or pose an imminent or substantial danger to human health.

Sewer System Management Plan (SSMP)

Standard Operating Procedures (SOP)

Refers to written procedures that pertain to specific activities employed in the operation and maintenance of the Sanitary Sewer System.

Standard Dimension Ratio (SDR)

Refers to the ratio of pipe diameter to pipe wall thickness in plastic pipes.

Standard Operating Procedures (SOP)

Refers to written procedures that pertain to specific activities employed in the operation and maintenance of the sanitary sewer system.

Standard Specifications

Refers to the latest edition of Standard Specifications published by the California Department of Transportation, Caltrans.

State Water Resources Control Board (SWRCB)

Refers to the California Environmental Protection Agency, State Water Resources Control Board.

Note: The State Board is a separate entity from the North Coast Regional Water Quality Control Board, although the agencies are closely connected.

Supervisory Control and Data Acquisition (SCADA)

Refers to the system that is employed by City to monitor the performance of its pump stations and to notify the operating staff when there is an alarm condition that requires attention.

System Evaluation and Capacity Assurance Plan (SECAP) SSMP Element VIII**Untreated or Partially Treated Wastewater**

Any volume of waste discharged from the sanitary sewer system upstream of a wastewater treatment plant headworks.

Upper Lateral

Refers to that portion of the Private Lateral generally from the property line or cleanout or for easement connections from the edge of the easement to the building owned and maintained by the private property owner.

Vitrified Clay Pipe (VCP)**Waste Discharge Identification Number (WDID)**

A unique identification number for the certification and reporting of collection system related actions and overflows in the CIWQS System. The City WDID is 1SSO10017

Wastewater Discharge Permit (WWDP)

The written permit or mechanism by which new or increased contributions of pollutants or changes in the nature of pollutants to the Subregional System by industrial users, maybe controlled to ensure compliance with applicable pretreatment standards, pretreatment requirements, or City local limits.

Water Discharge Requirement (GWDR, SSO GWDR)**Water Body**

Any stream, creek, river, pond, impoundment, lagoon, wetland, or bay.

Water of the State

Refers to “any surface water, including saline waters, within the boundaries of the state.” (California Water Code § 13050(e)).

Water Quality Monitoring Plan (WQMP)**Work Order (WO)**

Refers to a document (paper or electronic) that is used to assign work and to record the results of the work.

1.4. References

- State Water Resources Control Board Order No. 2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, California State Water Resources Control Board, May 2, 2006.
- State of California Water Resources Control Board Order No. WQ-2008-0002-EXEC, Adopting Amended Monitoring and Reporting Requirements for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems dated February 20, 2008
- State Water Resources Control Board Order No. Order No. 2013-0058-EXEC, Amending Monitoring and Reporting Program for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, September 9, 2013.
- State Water Resources Control Board Order No. 2022-0103, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, California State Water Resources Control Board, December 6, 2022.
- Agreement between the City of Santa Rosa and the City of Rohnert Park, City of Sebastopol, and South Park County Sanitation District for Use of the Santa Rosa Subregional Sewerage System dated April 3, 1975 and as amended four times thru July 16, 2002

Element I: Goals

Goal: 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.

I-1: SSMP Goals

The goals of the City of Sebastopol SSMP are:

1. Minimize the frequency and severity of sanitary sewer overflows (SSOs).
2. Provide reliable and resilient sewer service through proactive operation, maintenance, inspection, rehabilitation, and replacement of sewer system assets.
3. Protect public health, water quality, and the environment by preventing unauthorized discharges of sewage.
4. Maintain sufficient staffing, training, equipment, and financial resources to effectively operate and maintain the sewer collection system.
5. Prioritize maintenance and capital improvements using asset condition, system performance, and risk-based decision making.
6. Respond promptly and effectively to sewer system emergencies to minimize impacts to the public and the environment and restore service as quickly as practicable.
7. Comply with all applicable federal, state, and local regulatory requirements, including State Water Resources Control Board Order No. WQ 2022-0103-DWQ and the associated Monitoring and Reporting Program.
8. Continuously evaluate and improve the sewer system by monitoring system performance, implementing corrective actions, and periodically updating the SSMP to reflect changes in regulations, infrastructure, and operational practices.

References:

None.

Element II: Organization

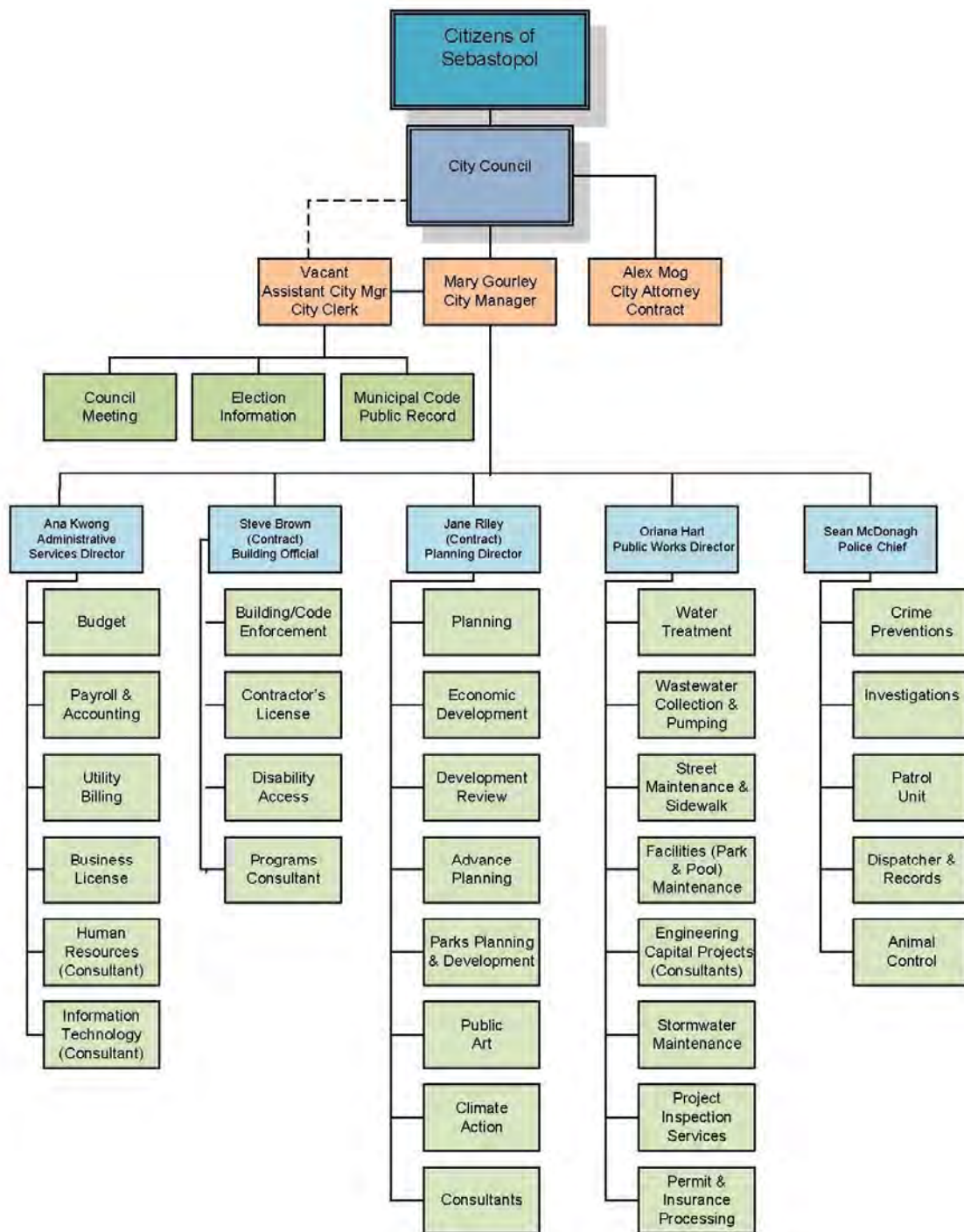
Organization: The SSMP must identify the organizational staffing responsible for implementing and maintaining the Sewer System Management Plan and shall include:

- (a) The name and title of the Legally Responsible Official (LRO) designated pursuant to Section 5.1 of the Order.
- (b) The position titles, telephone numbers, and email addresses 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 SSO, regulatory reporting, and notifications to the Regional Water Quality Control Board, California Office of Emergency Services (Cal OES), Sonoma County Environmental Health, and other agencies as applicable.

II-1: Organizational Structure

The organization chart for the management, operation, and maintenance of the City's wastewater collection system is shown on **Figure II-1**.

Figure II – 1: City Organization Chart



II-2: Authorized Representatives

The City's Legally Responsible Officials (LRO) for wastewater collection system matters is the Public Works Superintendent. In addition, the City Manager and the Operations Supervisor have been designated as additional LROs for the City. An LRO is authorized to submit electronic and

written spill reports to the California Office of Emergency Services (OES) and the Statewide reporting system (CIWQS). They are the City's legally responsible officials who are authorized to certify electronic spill reports submitted to CIWQS or as required by the WDR and/or MRP.

II-3: Responsibility for SSMP Development, Implementation and Maintenance

The Public Works Director and the Public Works Operations Supervisor have responsibility for developing, implementing, periodically auditing, and maintaining the City's SSMP. He/she may delegate the responsibility for developing, implementing, periodically auditing, and maintaining portions of the City's SSMP to his/her staff. The City of Santa Rosa Environmental Compliance Division is responsible for administering the City's Sewer Pipe Blockage Control Program (Element VII), including fats, oils, grease (FOG) control activities within the City's service area. Other City Staff responsible for developing, implementing, and maintaining specific elements of the City's SSMP, along with their job titles and contact information, are described below and listed in **Table II-1**.

City Manager (LRO) - Directs and coordinates administration of city government in accordance with policies determined by city council by performing the following duties personally or through subordinate supervisors.

Public Works Director (LRO) - Under administrative direction, to plan, organize, direct and coordinate the streets, parks, water distribution, sanitary sewer, wastewater treatment, swimming pool and vehicle maintenance programs of the City; to insure proper plan review for new Public Works projects; to represent Public Works functions with community groups and other government agencies, and to do related work as required.

Public Operations Supervisor (LRO) - To serve as department head in the absence of the Public Director; under department head's direction, to assign, supervise and assist in the construction, maintenance and repair of streets, water, sewer, parks and related public works facilities.

Management Analyst - Works under a minimum of supervision performing difficult, complex administrative and technical support duties, including specialized technical work related to Public Works operations, regulatory compliance, capital project management and contract administration, development review, permitting, inspection and oversight, and risk management. Provides expert customer service and information and referral to the public and City department staff.

Senior Maintenance Worker - Under direct supervision of the Operations Supervisor, to plan, direct, supervise, evaluate, and participate in the construction, maintenance and repair of streets, water, sewer, parks, and related public facilities.

Maintenance Worker III/II/I - Under general supervision, to operate light and moderately heavy power-driven equipment; to perform a variety of semiskilled or skilled manual tasks and to do specialized skilled jobs as required.

Maintenance Assistance - Under general supervision, to perform a variety of semiskilled or skilled manual tasks and to do specialized skilled jobs as required. This position serves as an

introduction to City Service and as a means to evaluate if a worker may be eligible to compete for other positions in the Maintenance Worker Classifications.

Engineering Manager – Performs various professional field and office engineering work to the management and administration of the City’s Capital Improvement Program (CIP) and public works infrastructure construction and maintenance projects; provides professional staff assistance to the Public Works Superintendent and the consulting City Engineer and other departments; performs a variety of studies and prepares and presents staff reports and applications for State and Federal funding.

Service Contractors – The City has agreements with the City of Santa Rosa for the management and administration of the FOG program and for environmental compliance.

Responsibility for SSMP Implementation and Maintenance

The Public Works Superintendent, the Assistant Public Works Superintendent and the Engineering Manager have responsibility for developing, implementing, periodically auditing, and maintaining the City’s SSMP. He/she may delegate the responsibility for developing, implementing, periodically auditing, and maintaining portions of the City’s SSMP to his/her staff. The City of Santa Rosa Environmental Compliance Division is responsible for the City FOG Program in Element VII.

City Staff responsible for developing, implementing, and maintaining specific elements of the City’s SSMP, along with their job titles and contact information, are shown in **Table II-1**.

Table II – 1: Responsible Officials for SSMP Elements

Element	Element Name	Responsible Official	Phone	Email
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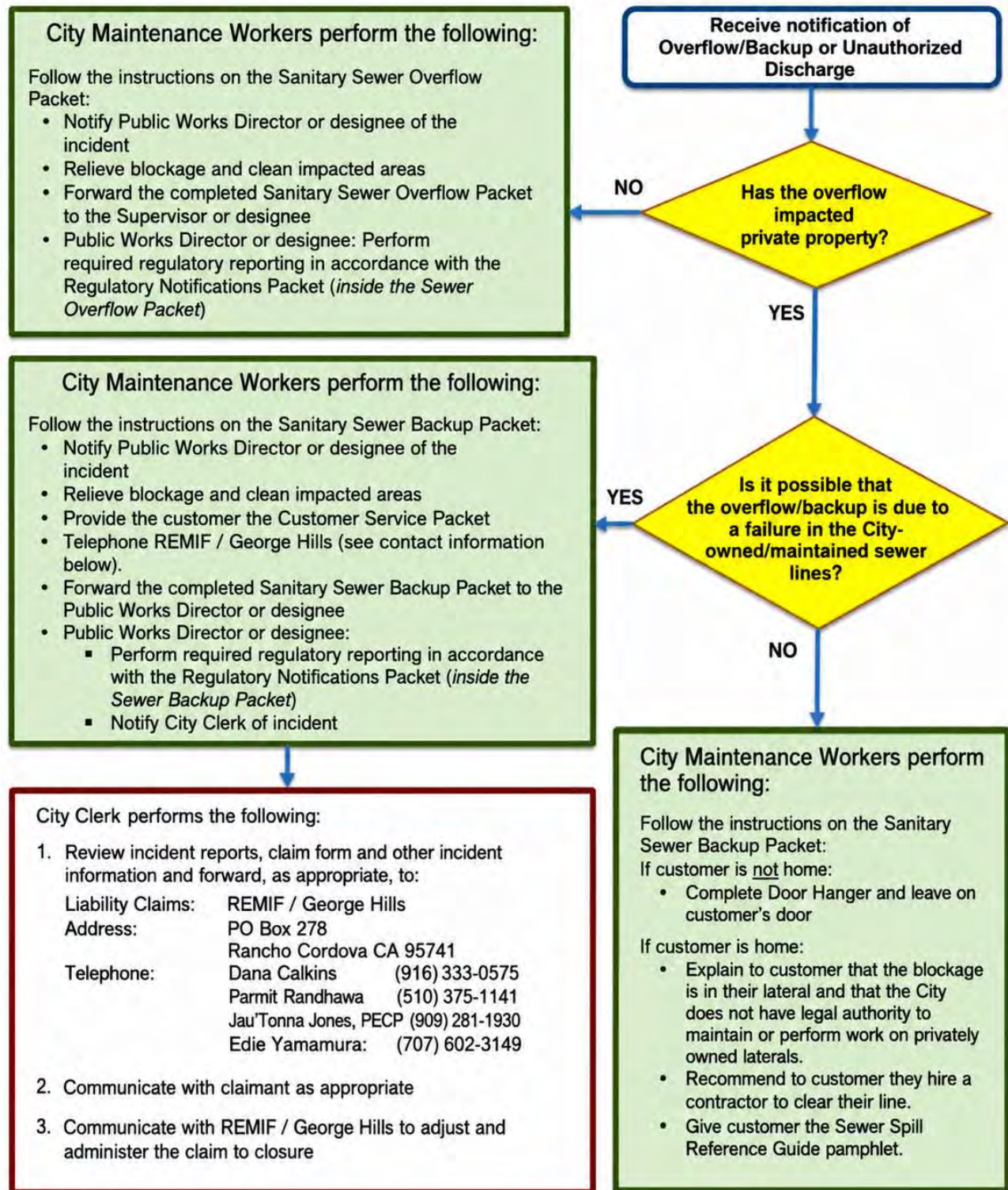
Element	Element Name	Responsible Official	Phone	Email
0	Introduction	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov
1	Goals	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov
2	Organization	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov
3	Legal Authority	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov
4	Operations & Maintenance Program	Operations Supervisor	707 823 5331	ebilling@cityofsebastopol.gov
5	Design and Performance Provisions	City Engineer	707 544 6274	john@moeengineering.com
6	Spill Emergency Response Plan	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov
7	Sewer Pipe Blockage Control Program	City of Santa Rosa Environmental Compliance Division	707 543 3369	envcompliance@srcity.org
8	System Evaluation, Capacity Assurance and Capital Improvements	City Engineer	707 544 6274	john@moeengineering.com
9	Monitoring, Measurement and Program Modifications	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov
10	Internal Audits	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov
11	Communication Program	Public Works Director (LRO)	707 823 5331	ohart@cityofsebastopol.gov

II-4: SSO Reporting Chain of Communication

The SSO Reporting Chain of Command follows the Organization Chart shown in **Figure II – 1**. The SSO Reporting process and responsibilities are described in detail in the Overflow Emergency Response Plan described in more detail in Element VI.

The SSO Reporting process and responsibilities are described in the Overflow Emergency Response Plan in Appendix D.

Figure II – 2: Chain of Communications Flow Chart



References:

None.

Element III: Legal Authority

Legal Authority: 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, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);
- (b) Require that sewers and connections be properly designed and constructed;
- (c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
- (d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and
- (e) Enforce any violation of its sewer ordinances.

III-1: City Municipal Code

The City's legal authority to implement and enforce the Sewer System Management Plan (SSMP) is established through the Sebastopol Municipal Code, including Title 13, Chapter 13.08, and other applicable provisions governing the operation, use, protection, and maintenance of the wastewater collection system. These ordinances provide the City with the authority necessary to regulate sewer system use, prohibit unauthorized discharges, require proper design and construction of sewer facilities, provide access for inspection and maintenance, enforce violations, and protect the wastewater collection system from inflow and infiltration (I&I), fats, oils, and grease (FOG), roots, debris, and other materials that may contribute to sanitary sewer overflows. The legal authorities applicable to the SSMP are summarized in Table III-1.

The City has delegated administration and enforcement of its Fats, Oils, and Grease (FOG) Control Program and Industrial Pretreatment Program to the City of Santa Rosa Subregional Water Reclamation System through the Director of Utilities and the Utilities Environmental Compliance Division. The City of Sebastopol retains responsibility for implementation of the SSMP and the operation, maintenance, repair, and rehabilitation of its wastewater collection system, including activities necessary to prevent sewer blockages and sanitary sewer overflows.

Table III – 1: Summary of Legal Authorities

Requirement	Legal Authority Reference Sebastopol Municipal Code (SMC)
Prevent illicit discharges into the wastewater collection system	13.08.070

Requirement	Legal Authority Reference Sebastopol Municipal Code (SMC)
Limit the discharge of fats, oils, and grease and other debris that may cause blockages	13.08.060
Require that sewers and connections be properly designed and constructed	13.08.060(B)
Require proper installation, testing, and inspection of new and rehabilitated sewers	13.08.060(B)
Clearly define City responsibility and policies	13.08.030
Ensure access for maintenance, inspection, or repairs for portions of the service lateral owned or maintained by the City	13.08.290(F)
Control infiltration and inflow (I/I) from private service laterals	13.08.240E2(r)
Limit the discharge of fats, oils, and grease and other debris that may cause blockages	13.08.240E*
Requirements to install grease removal devices (such as traps or interceptors), design standards for the grease removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements	13.08.210 et seq. and 15.04.070 (Uniform Plumbing Code)*
Authority to inspect grease producing facilities	13.08.290
Enforce any violation of its sewer ordinances	13.08.300 - 310

**In addition, the City by agreement with the Santa Rosa Subregional Water Reclamation Facility is required to maintain and operate the City collection system FOG and industrial waste program in accord with applicable laws and regulations and the Subregional Partners Agreement.*

III-2: Agreements with Satellite Agencies

The City coordinates with the City of Santa Rosa Subregional Water Reclamation System on regional source control, public outreach, and compliance programs related to fats, oils, and grease (FOG) and industrial wastewater discharges. The City does not own, operate, or receive flow from any publicly owned satellite collection systems.

III-3: References

- Agreement Between City of Santa Rosa and the City of Rohnert Park, City of Sebastopol and South Park County Sanitation District For Use of Santa Rosa Subregional Sewerage System dated April 3, 1975 as amended three times the latest being in December 8, 1994.

Element IV: Operations and Maintenance Program

Operation and Maintenance Program. 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 stormwater 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 including locations subject to root intrusion or recurring blockages, and shall incorporate regular visual and CCTV inspections of the sanitary sewer system. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;
- (c) Provide training on a regular basis for staff in sanitary sewer system operations and maintenance and require contractors to be appropriately trained. Training shall include SSMP requirements, spill response procedures, spill volume estimation, CIWQS reporting, and collection system operation and maintenance practices. Training records shall be maintained by the City; and
- (d) Provide equipment and replacement part inventories, including identification of critical replacement parts.

IV-1: Collection System Mapping

The City maintains a GIS-based map of the wastewater collection system. The mapping system includes gravity sewer mains, manholes, pump stations, force mains, valves, and other collection system assets. The GIS mapping is hosted through the Santa Rosa Subregional Water Reclamation System and is available to City staff for operations, maintenance, planning, and emergency response activities. Collection system staff update the GIS mapping as new information becomes available through maintenance activities, field investigations, CCTV inspections, capital improvement projects, and other operational activities. When discrepancies, unknown facilities, mapping errors, or other asset information are identified in the field, the GIS database is updated to reflect the most current information available.

The City has established map updating procedures to ensure that newly constructed facilities, field verified corrections, asset modifications, and other system changes are incorporated into the official GIS mapping in a timely manner.

IV-2: Computer Asset Maintenance Management System (CMMS)

The City is currently implementing an asset management system as its computerized maintenance management system (CMMS) for the wastewater collection system. The City has begun developing asset inventories and maintenance records within the system and continues to expand its use as resources allow. At present, much of the City's maintenance tracking, inspection documentation, and operational recordkeeping is performed through paper records, field notes, spreadsheets, and manual work order processes. Maintenance activities, inspections, cleaning operations, and corrective actions are documented and retained by Public Works staff.

As implementation of the CMMS progresses, additional asset information, maintenance records, inspection findings, and work order data will be incorporated into the system. The City anticipates that the CMMS will improve recordkeeping, maintenance scheduling, asset tracking, condition assessment, and long-term capital planning. In the interim, the City's existing recordkeeping practices continue to provide the documentation necessary to support operation, maintenance, and regulatory compliance activities.

IV-3: Preventive Operation and Maintenance

The elements of City's sewer system O&M program include:

- Proactive, preventive, and corrective maintenance of gravity sewers;
- CCTV inspection program to determine the condition of the gravity sewers;
- Periodic inspection and preventive maintenance for the pump stations and force mains;
- Rehabilitation and replacement of sewers that are in poor condition; and
- Proper training for City employees and contractors to assure proper operations and maintenance of the collection system facilities.

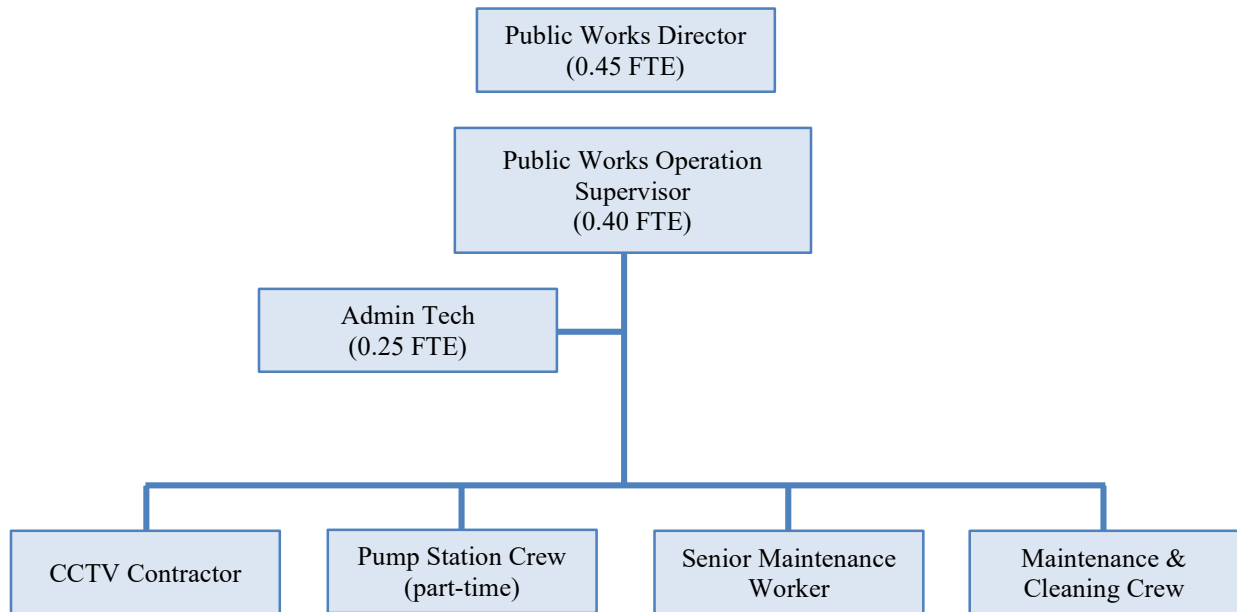
City's Public Works Department identified below in **Figure IV – 1 Organization Chart** is responsible for the normal maintenance and operations of the sanitary sewer collection system and the proper planning and emergency response. They are also responsible for capital and renewal and replacement planning and construction activities. Santa Rosa Regional coordinates and manages the fats, roots, oils, and grease (FOG) program for all food service establishments (FSE) in the service area.

The City Public Works Department staff is required to conduct all utility related functions. This requires each position in the organization chart to be able to conduct multiple utility functions such as water, storm drainage and sewer system maintenance. The total allocation of staffing resources to the collection system operations and maintenance function is currently 3.1 FTEs in 2025-26. The two crews and the senior maintenance worker are responsible for sewer system cleaning, hot spot cleaning, emergency response, pump station operation and maintenance and minor CCTV of small lines. The City currently has a services contract for a CCTV and condition assessment of all sewer lines and manholes completed since the last SSMP revision in 2020. Since then City staff has been responsible for minor CCTV work in the collection system. The

results are being used to evaluate cleaning protocols and future condition assessment needs and to prioritize future short- and long-range planning for renewal and replacement of sewer lines.

The crews are generally composed of one maintenance worker III and one maintenance worker I except when working in busy traffic areas or where safety is a concern. In these locations a third public works employee would be added to the crew to assure proper safety of the working crew.

Figure IV – 1: City Sewer Program Organization Chart



IV-3.1: Gravity Sewer Maintenance

The City proactively cleans its sewer system every five (5) years and is moving to clean six (6) miles per year, and it preventively cleans sewers with a history of problems monthly. The line cleaning crew evaluates cleaning results based upon the Nature and Quantity of Debris Removed During Cleaning **Table IV – 1** below. Staff places line segments on the high frequency schedule based upon past cleaning results, history of SSO events, history of cleaning results, previous CCTV assessments and/or professional judgment. Known problem areas, including locations with a history of root intrusion, recurring blockages, maintenance concerns, or sanitary sewer overflows, receive additional inspection and maintenance as necessary. One sewer-cleaning crew is assigned part-time to these activities and there are two (2) crewmembers per crew, depending on the specific activities required. These crews operate combination- cleaning units to accomplish cleaning of lines.

The City has broken the collection system into five (5) sewer basins for purposes of preventative maintenance – these basins are rotated annually until the entire system has been cleaned in approximately five years. In the future, the City will be moving to a condition-based program that will result in cleaning based upon the cleaning results and CCTV assessments. **Table IV – 2** contains the historical line cleaning results for the past five years excluding the high frequency cleaned line totals and lines 15 inches and greater. Currently, the City has approximately 4,000 linear feet of larger diameter lines that do not receive regular cleaning due to their size and lack of

historical performance problems. The City utilizes CCTV inspections, as resources permit, to evaluate pipe condition, identify defects, verify cleaning effectiveness, and support maintenance prioritization and capital planning activities.

The City has evaluated the methods available for the management and proper cleaning of sewer lines and is currently implementing an asset management system to support work order tracking, inspection documentation, and maintenance recordkeeping. Finally, the collection system also contains two (2) siphons that have not experienced any operational problems but have never had direct maintenance to them and are periodically evaluated as part of the City's ongoing maintenance and system assessment activities. Gravity sewer maintenance is currently scheduled by collection system zone only. The City has no formal work order (WO) or computerized maintenance management system (CMMS) currently. The City has selected and is under contract for the implementation of the CMMS for the management and scheduling of all complaints, preventative maintenance, and condition assessment activities. The use of a CMMS will create a systematic set of records that will support the recordkeeping requirements of the GWDR as well as easily track and make available performance results from the maintenance program. This software addition will assist the City in evaluating the effectiveness of its program in meeting the requirements of the GWDR and the goals of the City identified in Element 1.

Table IV – 1: Nature and Quantity of Debris Removed During Cleaning

Type of Debris	Clear (no debris)	Light	Moderate	Heavy
Sand, grit, rock	CLR	DL	DM	DH
Grease	CLR	GL	GM	GH
Roots	CLR	RL	RM	RH
Other (specify)	CLR	OL	OM	OH

Table IV – 2: Historical Gravity Cleaning Results

Calendar Year	Line Cleaning Results, linear feet	Line Cleaning Results, miles
2015	45,500	8.6
2016	13,500	2.6
2017	13,500	2.6
2018	51,900	9.8
2019	141,000	26.7
2020	47,869	9.07
2021	57,426	10.88
2022	69,940	13.25
2023	57,869	10.88
2024	67,367	12.76
2025	77,525	14.68
Total	643,396	121.86
Average per year	58,491	11.08

Source: City supplied infrastructure file dated 6/26/20

IV-3.1.1: Pipe Condition Assessment

The City's CCTV crew does periodic condition assessment and follow-up after all SSO events.. The City has been updating the condition assessment of the collection system and all manholes televised and new condition assessments completed. The results were used to assist with the cleaning program as well as establishing new priorities for the renewal and replacement of pipelines and manholes. The historical CCTV activity are included below in **Table IV – 3** and represent the calendar year assessments completed by City staff generally when a problem is found during cleaning or subsequent to an overflow event. The City CCTV inspection program will televise all lines at least every fifteen (15) years. The City will in the future be moving to a condition-based CCTV frequency based upon the PACP results as stated in **Figure IV – 2** below. In addition, in the next five years, the City will repair, rehabilitate, replace, abandon or reinspect all pipe segments within two hundred (200) feet of Zimpher Creek or Calder Creek and were found in a prior Condition Assessment to have a PACP structural rating of 4 or 5. These projects will be prioritized along with any other capital needs during the annual preparation of the sewer system capital improvement program

The City has one sewer repair crew to correct problems identified by the CCTV or sewer cleaning crews. Repairs are completed in priority order based on Pipeline Assessment and Certification Program (PACP) rating City crews are limited to repairs that are minor and do not require trench shoring. All other repairs are contracted with local construction companies.

The wastewater collection system staff maintains a list of known structural deficiencies determined from past and current CCTV results conducted during pipeline assessments. This list is maintained in priority order by structural rating. High priority structural deficiencies, PACP ratings 4 and 5, are repaired or have been repaired as soon as possible by the City's sewer repair crew or by an outside contractor on an as-needed basis.

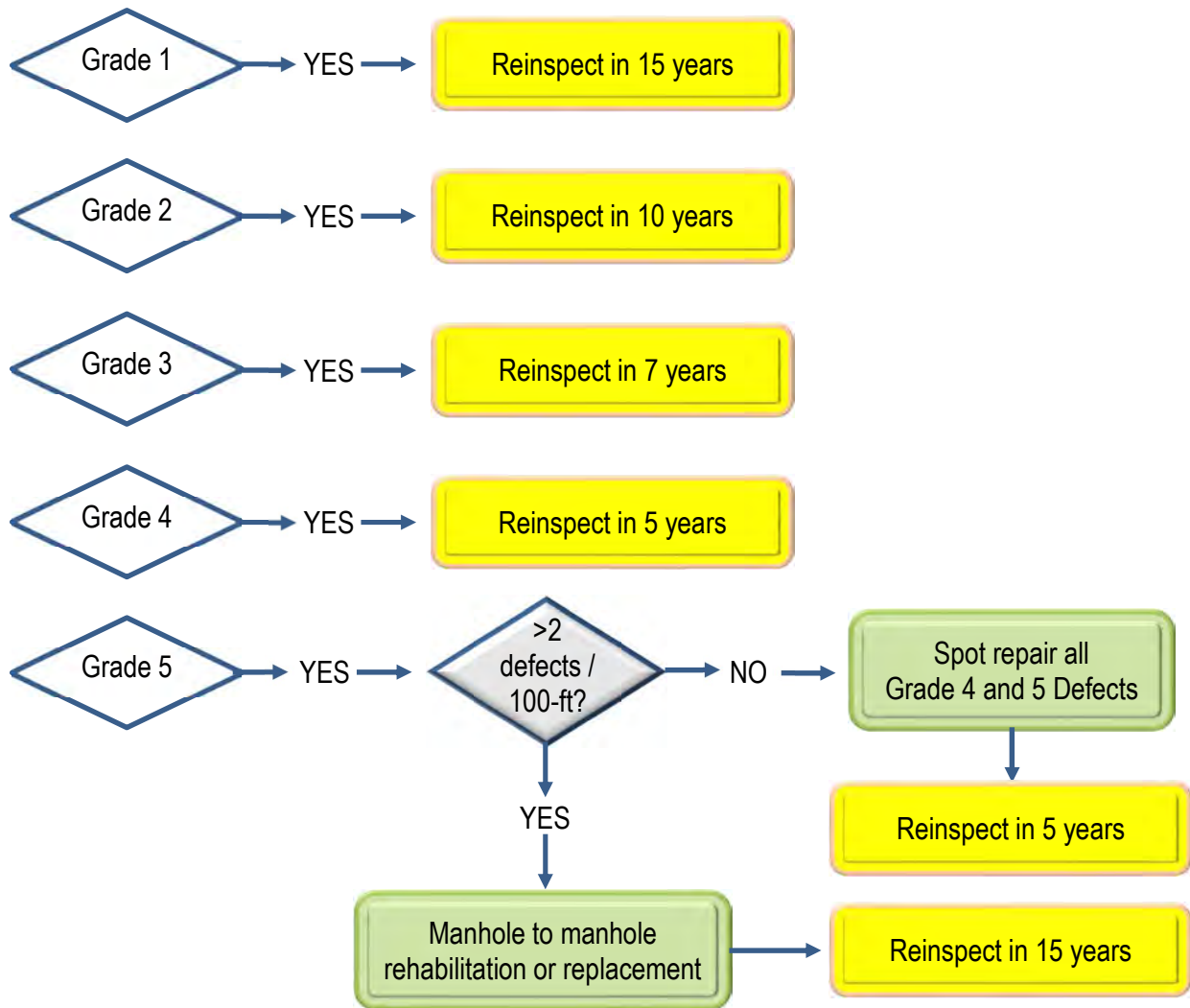
Table IV – 3: Historical Closed-Circuit Television by Calendar Year

Calendar Year	CCTV, Linear Feet	CCTV, miles	Percent of the System
2015	14,117	2.69	10.0
2016	71,551	13.55	50.4
2017	74,305	14.07	52.3
2018	2,525	0.48	1.8
2019	2,095	0.40	1.5
2020	10,811	2.05	6.9
2021	15,367	2.91	9.8
2022	688	0.13	0.4
2023	9,397	1.78	6.0

Calendar Year	CCTV, Linear Feet	CCTV, miles	Percent of the System
2024	11,085	2.10	7.1
2025	11,820	2.24	7.6
Total	195,026	36.94	115.9
Average per year	17,730	3.36	11

**Source City supplied infrastructure file dated 6/26/20*

Figure IV – 2: CCTV Return Frequency Flow Chart



IV-3.1.2: Manhole Inspection and Maintenance Program

As a result of the current settlement agreement with River Watch, the City implemented a new Collection System Inundation Mitigation Project that includes the installation of five (5) manhole overflow alarms and tracking systems and replaced twenty (20) new manhole frames and covers. In addition, the City staff regularly inspects and reports on manhole conditions as part of the active five-year pipeline cleaning program. These reports establish the need for any repairs or replacements due to manhole deterioration or corrosion.

IV-3.1.3: Pump Stations and Force Mains Maintenance

The City conducts regular operational inspections of its pump stations. Sanitary sewer pump stations are inspected on a daily basis. The wet wells are cleaned monthly. The electrical equipment preventive maintenance is scheduled annually. Mechanical equipment preventative maintenance is conducted based upon reductions in pump efficiencies noted by the field staff inspections. The City annually inspects both pump station related facilities utilizing **Supplement IV – 1, Pump Station and Force Main Assessment Checklist**.

The two (2) City Pump Stations discharge 1.99 miles of force mains. Force main alignments are inspected on an annual basis, and discharge locations are surveyed for possible damage and corrosion from the release of hydrogen sulfide when the force main discharges to the gravity collection system. **Tables IV – 4 and IV – 5** below lists the pump stations and force mains in the City, respectively.

The City has developed written pump station standard operating procedures for each pump station and these documents include the hard copy maintenance forms that are used to record important pump station operating and condition information.

Table IV – 4: Pump Station Locations and Asset Information

Pump Station Name	Location	No. Pumps	Pump GPM	Pump Manufacturer	Pump HP	Standby Generation-KW
Morris Street Pump Station	275 Morris Street	3	1000	Fairbanks Morse	150	500
Green Valley Pump Station	8401 Bodega Highway	2	500	Flygt	20	60

Table IV – 5: Force Main Locations and Descriptions

Name of Pump Station Associated with Force Main	Year Constructed	Force Main Asset Information		
		Length (linear feet)	Size (inches)	Material Type*
Morris Street Pump Station Force Main		10,500	14	HDPE, PVCC905
Green Valley Pump Station Force Main		3,756	8	ACP
Totals		14,256		

IV-3.1.4: Sewer Lateral Inspection/Repair Program

As a result of the recent settlement agreement with Riverwatch, the City is required to review, evaluate and conduct a public process to consider the adoption of a private sewer lateral inspection and repair program or the establishment of revolving loan fund to assist property owners in the repair or replacement of private sewer laterals.

IV-4: Rehabilitation and Replacement Program

The City's Capital Improvement Plan for the next five (5) years was developed from the CCTV inspection program that evaluates the condition of all gravity sewers and assigns a PACP condition assessment rating to each pipe segment inspected. The information gathered during the condition assessment was used to select gravity sewers and manholes for repair/rehabilitation/replacement and/or for additional smoke testing to define I/I potential.

The City has a sewer rehabilitation and replacement program to rehabilitate or replace the portions of its wastewater collection system where conditions warrant. The projects that are included in the City's Capital Improvement Program are listed in **Supplement IV – 2**. The funds that support the Capital Improvement Program come from the City's Sewer Fund. The sewer fund is an enterprise fund and sewer fees are established to meet projected needs.

IV-5: Training

The City uses a combination of in-house classes; on the job training; and conferences, seminars, and other training opportunities to train its wastewater collection system staff. The City highly encourages its wastewater collection system employees to be certified in Collection System Maintenance by the California Water Environment Association (CWEA). The certification process requires employees to demonstrate that they have participated in 12 hours of training every two years in order to renew their certificates. As of the date of this SSMP, eight of thirteen Public Works employees hold various levels of certification.

The City will annually train its wastewater collection system and Public Works employees on both the SSMP and Spill Emergency Response Plan (SERP), including spill response procedures, spill volume estimation, and applicable regulatory reporting requirements. This training may include field exercises in the estimation of SSO volumes and SSO containment.

The City's standard service and construction contract language requires all contractors working in or near the wastewater collection system to respond appropriately should an SSO occur in or around their work area. The City has included in its standard specifications, Part II General Conditions, Section 48 language and proper procedures for the contractor's response to causing or witnessing a sanitary sewer overflow. Additional provisions are also included in Element 6, SERP, and Section VI-14.4

IV-6: Outreach to Service Contractors

The City participates with the Santa Rosa Subregional Water Reclamation System region-wide outreach program and has posted brochures on the City website to aid and educate contractors & residents. The City SSMP is available on the Engineering/Water and Wastewater web page along with all references as required by the MRP

IV-7: Resiliency

The City of Sebastopol is committed to maintaining a resilient wastewater collection system capable of providing reliable service during routine operations and emergency conditions while minimizing the potential for sanitary sewer overflows (SSOs). Resiliency is incorporated into the City's operation, maintenance, rehabilitation, emergency preparedness, and capital improvement planning to improve the reliability of the collection system and reduce risks to public health and the environment.

A significant portion of the City's wastewater collection system is located within the Federal Emergency Management Agency (FEMA) 100-year floodplain associated with the Laguna de Santa Rosa. During periods of intense rainfall, localized flooding, elevated groundwater, and restricted access, these conditions can increase the risk of equipment failure, inflow and infiltration, and sanitary sewer spills. The City considers these risks when prioritizing maintenance activities, planning capital improvements, and responding to emergency events.

The City employs a proactive maintenance program that includes routine sewer cleaning, closed-circuit television (CCTV) inspections, condition assessments, and risk-based prioritization of maintenance and rehabilitation activities. Information obtained through these activities is used to identify system deficiencies, prioritize capital improvements, and improve the long-term reliability and resiliency of the wastewater collection system.

Critical wastewater facilities, including the City's pump stations, are continuously monitored through the Supervisory Control and Data Acquisition (SCADA) system. In addition, the City utilizes SmartCover monitoring devices at strategic locations within the collection system to provide real-time notification of elevated sewer levels that may indicate developing blockages, hydraulic restrictions, or other abnormal operating conditions. These monitoring systems improve situational awareness, allow staff to respond proactively before conditions worsen, and reduce the likelihood of sanitary sewer spills.

The City maintains and implements a Spill Emergency Response Plan (SERP) that establishes procedures for responding to sanitary sewer spills, flooding, power outages, equipment failures, and other emergency conditions affecting the wastewater collection system. Public Works personnel receive training on spill response procedures, emergency communications, regulatory reporting requirements, and spill mitigation measures. The City's emergency response capabilities are further strengthened through participation in the California Water/Wastewater Agency Response Network (CalWARN), which provides access to mutual aid resources, personnel, and specialized equipment during major emergencies.

Resiliency is also incorporated into the City's Capital Improvement Program and long-term infrastructure planning. As wastewater collection facilities are rehabilitated or replaced, the City evaluates opportunities to improve reliability, reduce vulnerability to flooding and other natural hazards, incorporate advances in monitoring technology, and enhance the long-term performance of the collection system. The City will continue to periodically evaluate system performance, maintenance records, asset condition information, emergency response activities, and emerging risks to identify opportunities to strengthen the resiliency of the wastewater collection system while maintaining compliance with the requirements of Order No. WQ 2022-0103-DWQ and the associated Monitoring and Reporting Program.

IV-8: Equipment and Replacement Parts

The list of the major equipment that City uses in the operation and maintenance of its sewer system is included in **Supplement IV – 3**.

The City has developed a Critical Replacement Parts List in **Supplement IV – 4**. It has also developed a Replacement Parts Inventory procedure.

IV-9: References

The data used in this section were taken from the following references:

- Settlement Agreement and Release, California River Watch dated June 12, 2020

Supplement IV – 1: Pump Station and Force Main Assessment Checklist

Inspection Information	
Inspection date	
Inspection participants	
Facility name	
Facility address	
Comments	

Background Information (Prior 12 Months)	
SSOs	
Equipment failures	
Alarm history (attach copy)	
Major maintenance activities (attach list if applicable)	
Pending work orders (attach copies)	
Operating problems (attach copy of operating log)	
Comments	

Security Features	
Fence and gate	
External lighting	
Visibility from street	
Doors and locks	
Intrusion alarm(s)	
Signs with emergency contact information	
Other security features	
Comments	

Safety Features and Equipment	
Signage (confined space, automatic equipment, hearing protection, etc.)	
Fall protection	
Emergency communication	
Equipment hand guards	
Handrails and kickboards	
Platforms and grating	
Tag out and lock out equipment	
Hearing protection	
Eye wash	
Chemical storage	
Comments	

External Appearance	
Fence	
Landscaping	
Building	
Control panels	
Other external features	
Comments	

Building/Structure	
Pump Station building	
Control room	
Dry well	
Wet well	
Other structures	
Comments	

Instrumentation and Controls (including SCADA Facilities)	
Control panel	
Run time meters	
Flow meter	
Wet well level	
Alarms	
SCADA HMI/PLC	
Other instrumentation & controls	
Comments	

Electrical and Switch Gear	
Power drop	
Transformers	
Transfer switches	
Emergency generator and generator connection	
Starters	
Variable frequency drives	
Electrical cabinets	
Conduit and wireways	
Other electrical	
Comments	

Motors	
Lubrication	
Insulation	
Operating current	
Vibration and alignment	
Other	
Comments	

Pumps	
Lubrication	
Vibration and alignment	
Seals	
Indicated flow and discharge pressure	
Shutoff head	
Corrosion and leakage evidence	
Drive shaft	
Other	
Comments	

Valves and Piping	
Valve operation	
Valve condition	
Pipe condition	
Pipe support	
Force Main Alignment	
Discharge Manhole Condition	
Other	
Comments	

Other	
Lighting	
Ventilation	
Support systems (air, water, etc.)	
Signage	
Employee facilities	
Sump pump	
Overhead crane	
Portable pump connections	
Portable pumps	
Comments	

Supplement IV – 2: Capital Improvement Program, \$1000*

Project Title	2025-/26	2026/27	2027/28	2029/2030	2030/31	Total
Zimpher Creek: Construction: Sewer Relocation Part 1 Covert	280	0	0	0	0	280
Zimpher Creek: Construction: Sewer Relocation Part 2	145	1.3	857		0	1,004
Zimpher Creek Sewer Relocation Part 3 - Repairs at East End	0	41	44	627	0	712
Sewer System Master Plan Update	147	0	0			147
Wastewater System Replacement Program	378	402	426	752	797	2,755
Morris St Pump Station Repair	400,000					400,000
Total	\$1,252	\$444	\$1,327	\$1,379	\$797	\$5,199

*2026-27 City Budget, Pages

Supplement IV – 3: Major System Equipment Inventory*

Equipment Number	Equipment Description	Year Purchased
11PW	Ford 250 w/Scelzi Utility Body	2019
12PW	Ford 350 4X4 Pickup	2016
15PW	Ford 250 w/Scelzi Utility Body	2014
17PW	Ford 250 w/Scelzi Utility Body	2014
18PW	Ford F250, w/Scelzi Utility Body	2017
19PW	Ford F350, w/ Dump Body	2014
20PW	Ford F650 5-yd Dump	2019
22PW	Ford F650 5-yd Dump	2010
23PW	Ford F250 w/Scelzi Utility Body	2020
25PW	Ford 250 w/Scelzi Utility Body	2017
87PW	John Deere 310E Backhoe Corp Yard	2002
89PW	John Deere 310L Backhoe	2015
95PW	Vactor 2103 Vacuum/Hydro Combo Truck	2009
97PW	Vactor 2103 Vacuum/Hydro Combo Truck	2017
MS-	Fairbanks Morris 5", C5416 Pumps X3	2012
MS-	Flygt CP3068.090 Morris Street Sump Pump	2012
MS-	CAT C15, S/N C5E02502 Morris Street Generator	2012
MS-	T20" Morris Street Dimminuter	2012
MS-	Whipps Inc./Rotork Morris St Sluice gate w/ Rotork Operator	2012
VV-	Flygt 3152, 454, 20HP Valley View Pumps X3 2 in service, 1 backup	2008 - 2014
VV-	Onan-Cummings 3.9L, S/N 45302029, Valley View Generator	1995

*Source: City supplied equipment inventory July 2026

Supplement IV – 4: Critical System Replacement Parts Inventory*

Part Description	Number in Stock	Location
4" Sewer repair couplings	25	East Shop
6" Sewer repair couplings	20	East Shop
8" Sewer repair couplings	5	East Shop
10" Sewer repair couplings	4	East Shop
6" Romar dresser couplings	4	East Shop
8" Romar dresser couplings	2	East Shop
10" Romar dresser couplings	3	East Shop
4" SDR 35 PIPE	100	Pipe Rack
6" SDR 35 PIPE	20	Pipe Rack
8" SDR 35 PIPE	20	Pipe Rack
10" SDR 35 PIPE	20	Pipe Rack
12" SDR 35 PIPE	32	Pipe Rack
14" SDR 35 PIPE	12	Pipe Rack
6" C900 PIPE	40	Pipe Rack
10" C900 PIPE	40	Pipe Rack
3" SCH40 PIPE	20	Pipe Rack
6" SCH40 PIPE	80	Pipe Rack

*Source: City supplied inventory June 2026

Element V: Design and Performance Provisions

Design and Performance Provisions:

- (a) Updated 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.

V-1: Design Criteria for Installation, Rehabilitation and Repair

The City's Wastewater Collection System Design Criteria are:

V-1.1: General

The City of Sebastopol's current City Standard Details and Specifications were formally adopted by the City Council by Resolution 6490 on November 15, 2022. The standards are available from the City Public Works Department or can be located on the Engineering Department web page titled "Engineering Contractors and Consultants". In addition, the latest edition of the State of California Department of Transportation Standard Specifications supplements these standards.

V-1.2: Main, Manholes, Clean Outs and Laterals

Standard Details 500-527 provides the details and specifications for the installation of new and rehabilitated mains, manholes, cleanouts and laterals within the public right-of-way.

V-1.3: Pump Station

The City strives to minimize the need for sewer pumping stations by the use of gravity systems as a first alternative. If pumping facilities are determined by the part time City Engineer to be required, then these designs are prepared and signed by a professional engineer upon approval of the City Engineer.

V-1.4: City Sewer System – Authorized Materials

The authorized materials for the City Sewer System are shown below in **Table V – 1**.

Table V – 1: Acceptable Pipe Materials for New Gravity Sewers

Material	Designation	Standard
Ductile Iron Pipe (DIP)	Cement mortar lined and coated	ANSI A21.51 (AWWA C151)
Polyvinylchloride Pipe (PVC)	SDR-26	ASTM D2241

V-1.5: Private Sewer Systems

All private sewer systems are to be designed, approved and installed pursuant to the City Building and Safety Department construction codes and regulations after review and approval by the City Engineer.

V-2: Inspection and Testing Criteria

The City's Sanitary Sewer Lines Inspection and Testing Criteria are based on the City Standard Details and Specifications on the City webpage under Engineering Contractors and Consultants or as required by the City Engineer. The City's inspection and testing criteria are:

V-2.1: New and Rehabilitated Gravity Sewers

a. Inspection during Construction

All new gravity and rehabilitated sewers will be periodically inspected during construction to ensure that the sewer is constructed using the specified materials and methods.

b. Leakage

All new gravity sewers will be air tested to verify that they have been properly constructed immediately following pipe cleaning. The contractor shall supply all necessary equipment to air test a new segment of pipeline. The air test shall be conducted at an internal pressure of 4 psi at the required time based upon pipe length and size. See City Standard Specifications for further details. Gravity sewers that fail the test shall be repaired and retested until they pass.

c. Deflection

Deflections between any two successive pipe sections shall not exceed 80 percent (80%) of the maximum deflection as recommended in writing by the pipe manufacturer. In addition, PVC pipe will be tested for pipe deflection thirty days (30) following backfill and compaction for ring deflection per City Standard Specifications.

d. CCTV Inspection

All new gravity sewers will be inspected using a CCTV to verify that the pipe is free from defects/damage, that the joints have been correctly constructed, and that the sewer is free from sags that will cause future operational problems. Gravity sewers shall be cleaned prior to inspection and shall be flushed with water so that sags can be readily identified. Defects shall be recorded following the City of Sebastopol standards. Sags that exceed one inch in depth shall be repaired.

e. Warranty Inspection

All new gravity sewers will be inspected using CCTV prior to the end of the warranty period, bond release and final acceptance by the City Council to ensure that there are no latent defects. Repairs shall be completed at Contractor's expense.

V-2.2: New and Rehabilitated Manholes

a. Inspection during Construction

All new and rehabilitated manholes will be periodically inspected during construction to ensure that the sewer is constructed using the specified materials and methods. Unusual conditions and special features will be recorded for future reference.

b. Leakage

All new and rehabilitated manholes will be water tested to verify that the joints, connections, and frame/cover are tight. Each manhole shall be tested for leakage by plugging the sewer line between the manhole and the first joint. The manhole shall be filled with water and any drop in water level over a four-hour period shall be carefully measured. A leakage rate in excess of 10 gallons per day shall be cause for rejection and the contractor shall repair the manhole until leakage is within the limits specified.

V-2.3: New and Rehabilitated Pump Stations

a. Inspection during Construction

All new and rehabilitated pump stations will be periodically inspected during construction to ensure that they are constructed using the specified materials and methods. Unusual conditions and special features will be recorded for future reference.

b. Functional Test

All systems in new and rehabilitated pump stations will be tested to ensure they function as intended.

c. Performance Test

All new and rehabilitated pump stations will be required to pass an extended performance test to ensure that they are capable of reliably meeting the design performance for a period of at least 120 hours of continuous operation without failure or alarms. The results of these performance tests will be recorded for use as a basis for evaluating future pump station.

V-3: References

- Sebastopol Standard Details and Specifications, November 15, 2022.

Element VI: Spill Emergency Response Plan (SERP)

Spill Emergency Response Plan (SERP)- Each Enrollee shall develop and implement a Spill Emergency Response Plan (SERP) 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, storm drain agencies etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the Statewide Sanitary Sewer Systems General Order and applicable reporting requirements. All SSOs shall be reported in accordance with the General Order, the California Water Code, and other applicable regulatory 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 Spill 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) Procedures to contain spills, recover sewage, and prevent discharges to storm drain systems, drainage conveyance facilities, and waters of the State;
- (g) Procedures for coordination and communication with storm drain agencies and other affected agencies before, during, and after spill events, as appropriate;
- (h) Procedures for post-spill assessment, documentation of response activities, and evaluation of corrective actions necessary to prevent recurrence; and
- (i) Procedures for periodic review and evaluation of the effectiveness of the Spill Emergency Response Plan and updates as necessary.
- (j) 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

Sanitary Sewer Overflow Emergency Response Plan

(ref. SWRCB Order No. WQ 2022-0103-DWQ) City of Sebastopol Overflow Emergency Response Plan dated September 2020 by DKF Solutions Group, LLC.

VI-1: Purpose

The purpose of the City's Spill Emergency Response Plan (SERP) is to support an orderly and effective response to Sanitary Sewer Overflows (SSOs). The SERP also establishes procedures to protect public health, minimize impacts to waters of the State, coordinate with appropriate agencies, and implement corrective actions to prevent recurrence of SSOs. This SERP satisfies the requirements of the State Water Resources Control Board's Statewide Sanitary Sewer Systems General Order (Order WQ 2022-0103-DWQ), which requires wastewater collection system agencies to maintain and implement a Spill Emergency Response Plan.

VI-2: Policy

The City's employees are required to report all wastewater overflows from public sewer infrastructure including from the manholes included in the Collection System Inundation Mitigation Project and to take the appropriate action to secure the wastewater overflow area, properly report to the appropriate regulatory agencies, relieve the cause of the overflow, and ensure that the affected area is cleaned as soon as possible to minimize health hazards to the public and protect the environment. City's goal is to respond to sewer system overflows as soon as possible following notification. City will follow reporting procedures in regard to sewer spills as set forth by the North Coast Regional Water Quality Control Board (*NCRWQCB*) and the California State Water Resources Control Board (*SWRCB*).

VI-3: Goals

City's goals with respect to responding to SSOs are:

- Work safely;
- Respond quickly to minimize the volume of the SSO;
- Eliminate the cause of the SSO;
- Prevent sewage system overflows or leaks from entering the storm drain system or receiving waters to the maximum extent practicable;
- Contain the spilled wastewater to the extent feasible;
- Minimize public contact with the spilled wastewater;
- Mitigate the impact of the SSO;
- Meet the regulatory reporting requirements;
- Evaluate the causes of failure related to certain SSOs; and
- Revise response procedures resulting from the debrief and failure analysis of certain SSOs.

VI-4: Full Spill Emergency Response Plan

The full copy of City Spill Emergency Response Plan effective September 2020 can be found in Appendix E along with copies of all instructions and forms in response packets referred to below. All SSO sampling and testing shall be conducted per City Water Quality Monitoring Plan (WQMP) included in Appendix F.

VI-5: Authority and References

- Health & Safety Code Sections 5410-5416
- CA Water Code Section 13271
- Fish & Wildlife Code Sections 5650-5656
- State Water Resources Control Board Order No. 2006-0003-DWQ
- State Water Resources Control Board Order 2013-009-DWQ effective September 9, 2013
- City Overflow Emergency Response Plan September 2020
- City of Sebastopol Water Quality Monitoring Report dated September 2020

Element VII: Sewer Pipe Blockage Control Program

Sewer Pipe Blockage Control Program: Each Enrollee shall evaluate its service area to determine whether fats, oils, grease (FOG), roots, debris, rags, or other materials contribute to sewer blockages or sanitary sewer overflows. If sewer pipe blockages are found to be a problem, the Enrollee must prepare and implement a Sewer Pipe Blockage Control Program 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) An implementation plan and schedule for a public education outreach program that promotes proper disposal of fats, oils, grease, wipes, rags, and other materials that may contribute to sewer blockages;
- (b) A plan and schedule for the disposal of fats, oils, and grease 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 fats, oils, and grease 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 fats, oils, grease, roots, debris, rags, and other blockage-causing materials;
- (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 blockages, root intrusion, grease accumulation, or recurring maintenance issues, and establishment of a cleaning maintenance schedule for each section; and
- (g) Development and implementation of source control measures for all sources of blockage causing discharged to the sanitary sewer system for each section identified in (f) above.

VII-1: Nature and Extent of FOG Problem

The FOG Source Control Program is intended to work in conjunction with the City's preventive maintenance program to prevent FOG-related SSOs. It remains an essential component in meeting and maintaining its projected SSO reduction performance goals. The City currently lists 43 food service establishments (FSE) within the City service area.

The elements of the City's FOG Source Control Program include:

- Requirement for the installation of grease removal devices (GRDs);
- Permitting food service establishments (FSE);
- Requirement for proper operation and maintenance of GRDs
- Verification of grease handling and disposal practices
- FSE inspections
- Public Education and Outreach and
- Enforcement.

The Santa Rosa Director of Utilities is responsible for administering the City's Pretreatment Program that includes the FOG Source Control Program. The Santa Rosa Environmental Compliance Section at the Sub regional Plant conducts all activities related to FOG. The level of staffing is considered adequate for all of the Sub regional FOG programs.

The legal authority to implement, monitor and enforce the elements of the FOG Program in the service area is governed under the City Municipal Code and the codes and procedures of the City of Santa Rosa Environmental Compliance Section. These codes and procedures provide the legal authority to prohibit FOG discharges to the sanitary sewer system.

FSEs subject to the FOG Program are required to install GRDs consistent with the recommended procedures for design, construction and installation based on the current adopted California Plumbing Code. Plan check review for grease removal device installation is coordinated with the Building Division during the building permit application process.

FSEs subject to the FOG Program are required to obtain a wastewater discharge permit, which provides the legally enforceable framework to enforce the elements of the FOG Program. The discharge permit contains specific permit conditions, which require FSEs to implement FOG Best Management Practices including:

- Proper GRD operation and maintenance
- Documentation and retention of GRD pumping/cleaning activities
- Employee training on FOG handling BMPs, proper equipment cleaning, spill response clean up and control procedures
- Prohibition on the installation and use of food waste disposal grinder
- Proper disposal of grease, oils, and meat fat
- Prohibition on the use or addition of chemical or biological agent for the maintenance of GRD

The discharge permit also provides information on facility specifics relating to local limits, inspection requirements and rights of entry, reporting requirements relating to spill or accidental discharges, records retention, confidential information, limit or permit transfer, perjury clause, fees, permit duration and renewal process. In sum discharge permits issued to FSEs under the

FOG Program are similar and consistent with a discharge permit typically issued to establishments covered under the Pretreatment Program. Staff from the Office of Environmental Compliance is currently evaluating whether to adopt a streamlined permit format similar to those issued and used by neighboring agencies to enforce and comply with the FOG Program required by the Sanitary Sewer Order. Any changes made to the FSE permitting program will be reported on the next SSMP audit or update.

The City of Santa Rosa FOG Enforcement Response Policy (ERP) available at the Environmental Compliance office was developed and approved for use to enforce the Pretreatment Program is also utilized to enforce the FOG Program. The ERP serves as a guidance document to ensure inspection staff takes consistent actions to achieve timely and effective compliance. The ERP contains procedures and progressive enforcement actions for various field violation scenarios that include verbal and written notices of violations, cleanup requirements, administrative and criminal penalties. Each level of corrective action includes a schedule to achieve timely compliance. Enforcement actions are coordinated and communicated with applicable city staff to ensure timely resolution.

Public education and outreach remain an integral element of the FOG Program and information is available at the following Santa Rosa website <https://srcity.org/1232/Pollution-Prevention>. Outreach is provided to FSE staff and management during routine inspections. Regional bilingual FOG BMP pamphlets and posters are distributed to staff and management to increase their knowledge on proper management of grease waste. Other materials distributed may include grease scrapers, list of grease haulers and cooking oil recyclers, and general technical information on grease removal devices. Inspectors strive to provide educational information to ensure FSE staff and management to ensure continued compliance with their discharge permit. Outreach targeting the general public is primarily achieved through distribution of FOG brochures and scrapers during city- sponsored events. Collection crews provide additional outreach by distributing FOG door hangers and brochure to homeowners during service calls and routine preventative maintenance activity. FOG related brochures are available on the City website.

VII-2: Response to GWDR Requirements

Requirement (a):

An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG. All public education and outreach are conducted for the City by the Santa Rosa Utilities Department

Response:

The Santa Rosa Utilities Department has performed significant public outreach and education on the subject of grease control for both residential and commercial/industrial customers. Utility bill inserts have been sent to resident's multiple times within the past few years. The City participates annually at the Water Fair and at the Cinco de Mayo celebrations. Other examples of public education materials may be found on the City website at: <http://ci.santa->

rosa.ca.us/departments/utilities/treatment/environmental_compliance/Pges/FOGSourceControlProgram.aspx

Requirement (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.

Response:

The responsibility for grease disposal is placed upon the business owner as a condition of its Wastewater Discharge Permit (WWDR). The Environmental Compliance Section informs the user of possible grease disposal providers and requires a certification of grease disposal at varying intervals. The nearest grease disposal site is EBMUD in Oakland, CA. The FOG Source Control Program on the Utilities Department website lists possible grease haulers.

Requirement (c):

The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG.

Response:

The Sebastopol Municipal Code Section 13.08.030 provides the legal basis and authority (see Element 3) for the City's FOG Control Program. This code section transfers full authority for the program to the City of Santa Rosa Director of Utilities and the Santa Rosa Subregional Water Reclamation Facility.

Requirement (d):

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

Response:

The City's FOG Control Program is defined in Municipal Code Sections 13.08.290 and 15.04.070 and is managed by the Santa Rosa Director of Utilities.

Requirement (e):

Authority to inspect grease producing facilities, enforcement authorities, and determination of whether the collection system has sufficient staff to inspect and enforce the FOG ordinance.

Response:

Enforcement of the FOG program is included in Municipal Code Section 13.08.210 to 13.08.230 and is administered by the Director of Utilities on behalf of the City of Sebastopol.

The Environmental Compliance Section permits, inspects, and implements compliance activities for sources of grease discharged to the wastewater collection system within the Subregional

service area. New water account lists, plan check identification and local trade magazines are used to identify new food service establishments (FSE). The FSEs are permitted every six years and inspected annually, biannually, or triennially dependent on the record of inspection, documentation of grease removal, and compliance status. Should local crews find grease buildup in sanitary sewer lines then area sweeps of surrounding FSEs are implemented to look for the source of the increased grease accumulation.

Compliance enforcement actions consist of Notice of Violations and Administrative Orders when necessary. Escalation supported by the City of Santa Rosa Code Title 15 – Sewers has termination of service as a final resort to end a non-compliant situation. The Enforcement Response Plan section has six Environmental Compliance Inspectors and a half time administrative person for the implementation of the whole pretreatment program. Job duties of the plan check, grease removal devise sizing, site inspection and enforcement account for two employee equivalents in the section. The inspectors also work with the Environmental Crimes Unit in the Police Department. The Unit investigates and acts in cases where there have been illegal or unauthorized discharges to the collection system.

The Master Agreement with the Sub regional Partners including the City of Sebastopol, requires each User Agency to collect and convey sewage to the Sub regional System in such a manner as to comply with all applicable laws, rules and regulations. They also mutually agreed that the User Agencies will enact Sewer Use Ordinances addressing specific limitations and prohibitions of discharges. The Sub regional Environmental Compliance Inspectors enforce the rules and regulations applied to non-domestic discharge and industrial users for the Sub regional Partners

Requirement (f) and (g):

Requirement (f) is an identification of sewer system sections subject to FOG blockages and the establishment of a cleaning maintenance schedule for each section, and

Requirement (g) is the development and implementation of source control measures, for all sources of FOG discharged to the sewer system.

Response:

The City's preventive maintenance program is currently targeted on the problematic grease dischargers and the FOG "high frequency" areas identified either from system cleaning, CCTV assessments or from the results and reports of the City of Santa Rosa from FSE inspections and evaluations and annual reports

VII-3: References

The data used in this section were taken from the following references:

- City of Santa Rosa Fats, Oils and Grease (FOG) Enforcement Response Policy January 2010

Element VIII: System Evaluation and Capacity Assurance Plan

System Evaluation and Capacity Assurance Plan: 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) **System Evaluation and Condition Assessment:** Actions needed to evaluate portions of the sanitary sewer system that are experiencing, or may contribute to, sanitary sewer overflows, capacity limitations, structural deficiencies, or operational concerns.
- (b) **Capacity Assessment and Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria. The evaluation shall consider existing and projected wastewater flows, inflow and infiltration, pumping capacity, system redundancy, and other factors that may affect system performance.
- (c) **Prioritization of Corrective Actions:** The Enrollee shall identify and prioritize corrective actions necessary to address hydraulic deficiencies, structural deficiencies, recurring maintenance issues, and other conditions that may contribute to sanitary sewer overflows. Prioritization shall consider the likelihood of failure, consequences of failure, public health impacts, environmental impacts, regulatory compliance, and operational considerations.
- (d) **Capital Improvement Plan:** The steps needed to establish a short- and long-term CIP to address identified deficiencies, including prioritization, alternatives analysis, funding considerations, and implementation schedules. The CIP shall include an implementation schedule and identify funding sources.
- (e) **Schedule:** The Enrollee shall develop and maintain a schedule of completion dates for capital improvement projects and corrective actions identified in the CIP. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements.
- (f) **System Resilience.** The Enrollee shall evaluate the vulnerability of the wastewater collection system to natural and human-caused hazards that may adversely affect system performance, reliability, or capacity. The evaluation shall consider factors such as flooding, erosion, wildfire, power outages, severe weather events, and other conditions that may contribute to sanitary sewer overflows or service interruptions. The Enrollee shall identify and prioritize measures to improve system resilience through operation and maintenance activities, capital improvement projects, emergency response planning, and asset management practices.

VIII-1: System Evaluation – Collection System Master Plan

The City completed a Sanitary Sewer Utility Master Plan in December 2005 (Master Plan) and is in the process of updating this Master Plan. The master planning effort included selection of peaking factors for wet weather, flow monitoring, hydraulic modeling, smoke testing, manhole inspection, and CCTV inspection. The Master Plan utilized the 2017 Sebastopol updated General Plan and the wastewater levels of service standards from the General Plan. The Master Plan included hydraulic modeling of the collection system based upon the distribution of infiltration and inflow over the entire service area. This effort was used to locate areas where lines were deficient or undersized for both the then current and future build-out state of the collection system.

The Master Plan will identified deteriorated sewer lines that needed additional capacity or replacement in order to handle the flows associated with build-out. In addition, the plan identified several required improvements in the Gravenstein Highway system that were needed for ultimate build-out of the system. The City updated the capacity information subsequent to the annual CCTV and condition assessment program. This work will also inform the City during this current Master Plan is warranted or desirable.

A new capital improvement program five (5) year plan will be developed from the condition assessment work identified above. The City has also increased sewer service charges to accommodate future capital work resulting from the pipeline assessment efforts.

VIII-2: Evaluation – Hydraulic Model

The City utilizes a hydraulic model as a planning tool to evaluate the capacity and performance of the wastewater collection system under existing and projected future conditions. The model incorporates estimated wastewater flows by land use classification, appropriate peaking factors, inflow and infiltration assumptions, pump station operating characteristics, and the physical characteristics of the collection system, including pipe sizes, slopes, and invert elevations.

The hydraulic model is used to evaluate the ability of the collection system to convey anticipated peak wet weather and peak dry weather flows, identify potential capacity constraints, and support the planning and prioritization of capital improvement projects. The model is updated periodically as new system information, infrastructure improvements, flow monitoring data, land use changes, and population projections become available.

The 2026 Sewer System Master Plan includes updates to the hydraulic model utilizing current system data and projected growth through the planning horizon of 2045. Model results are used to evaluate the capacity of the wastewater collection system, identify areas requiring improvement, and support compliance with the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (GWDR).

VIII-3: Design Criteria

The City's Sewer System Master Plan includes a hydraulic evaluation of the wastewater collection system utilizing estimated peak hourly flows by land use classification, appropriate peaking factors, inflow and infiltration assumptions, and projected growth within the City's service area. The original hydraulic model evaluated ultimate build-out conditions based on the General Plan in effect at the time of its development. The 2026 Sewer System Master Plan updates these analyses using current system information, projected land use, and population forecasts through the planning horizon of 2045 to evaluate the capacity of the existing wastewater collection system to accommodate current and anticipated future demands.

Capacity-related design criteria, including base wastewater flows, peaking factors, and minimum design standards, are incorporated into Element V – Design and Performance Provisions of this SSMP. All new sewer facilities, capacity improvements, rehabilitation projects, and system modifications shall be designed by a licensed Professional Civil Engineer in accordance with City standards and specifications and shall be reviewed and approved by the City Engineer prior to construction and acceptance.

VIII-4: City Enhancement Measures – Capital Improvement Program

The City prepares and the City Council adopts an annual capital improvement plan (CIP) that includes projects to address known wastewater collection system capacity issues. Engineering Staff, working with the Public Works Department, prioritize and select the projects to be included on the annual list. The City's Capital Improvement Program Sanitary Sewer System Detailed Budget for 2026-2031 is included in Appendix IV-C.

VIII-5: Schedule

The current schedule for the City's capacity enhancement projects are included in the City's Capital Improvement Program detailed budget in Appendix IV-C. However, this list will be revised, as necessary, based upon future condition assessments and maintenance results from the collection system operations and the recent River Watch Settlement Agreement.

VIII-6: References

The data used in this section were taken from the following references:

- City of Sebastopol Five-Year Capital Improvement Plan 2026-27
- City of Sebastopol 2026-27 Budget,
- River Watch Settlement Agreement dated June 12, 2020

Element IX: Monitoring, Measurement, and Program Modifications

Monitoring, Measurement, and Program Modifications:

The Enrollee 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, audit findings, condition assessments, operational data, and lessons learned from sanitary sewer overflow response activities; and
- (e) Identify and illustrate SSO trends, including frequency, location, and volume.
- (f) Utilize monitoring results, maintenance records, condition assessment information, performance metrics, and SSO trend analyses to identify opportunities for program improvements and to support adaptive management of the wastewater collection system.

IX-1: Performance Measures

The indicators that City uses to measure the performance of its sanitary sewer collection system and the effectiveness of its SSMP are:

- Number of SSOs per year
- Number of SSOs per year by cause (e.g., roots, grease, pipe failure, I/I,
- Pump failure or other deficiency, etc.)
- SSO Rate per 100 miles per year.
- Portion of sewage recovered compared to total volume spilled: and
- Volume of spilled sewage discharged to surface water.
- Collection system performance results.

IX-2: Baseline Performance

City has performance measures in place and evaluates its performance annually following the fiscal year. The historical performance is shown below starting in calendar 2008 through June 2025. These performance results will be used to assist City to evaluate the effectiveness of the sewer collection system program as part of the biannual internal audit.

IX-3: Mains, Pump Stations, and Force Mains

The baseline performance and SSO trends for the City sewer program are shown by calendar year on the following pages and the data is from CIWQS for the City WDID 1SSO10017 through June 2025.

Figure IX – 1: SSOs per Calendar Year

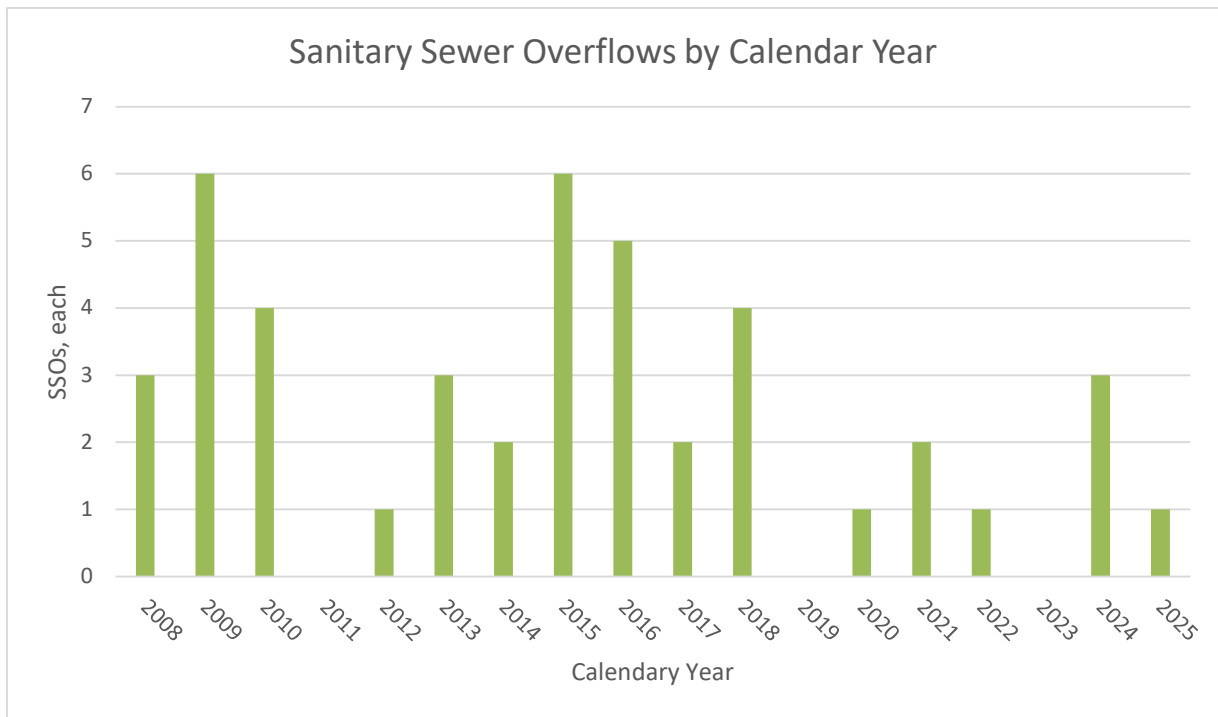


Figure IX – 2: Trend in SSOs by Cause

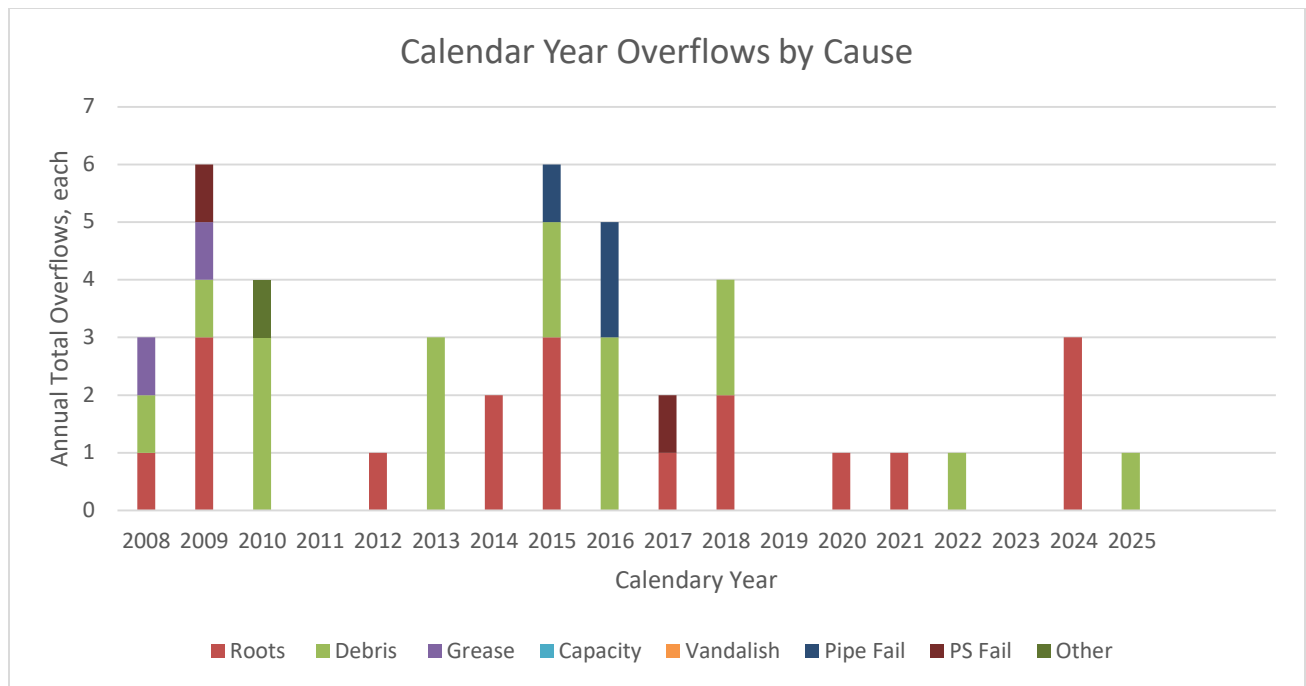


Figure IX – 3: Historical Spill and Recovered Volumes by Calendar Year

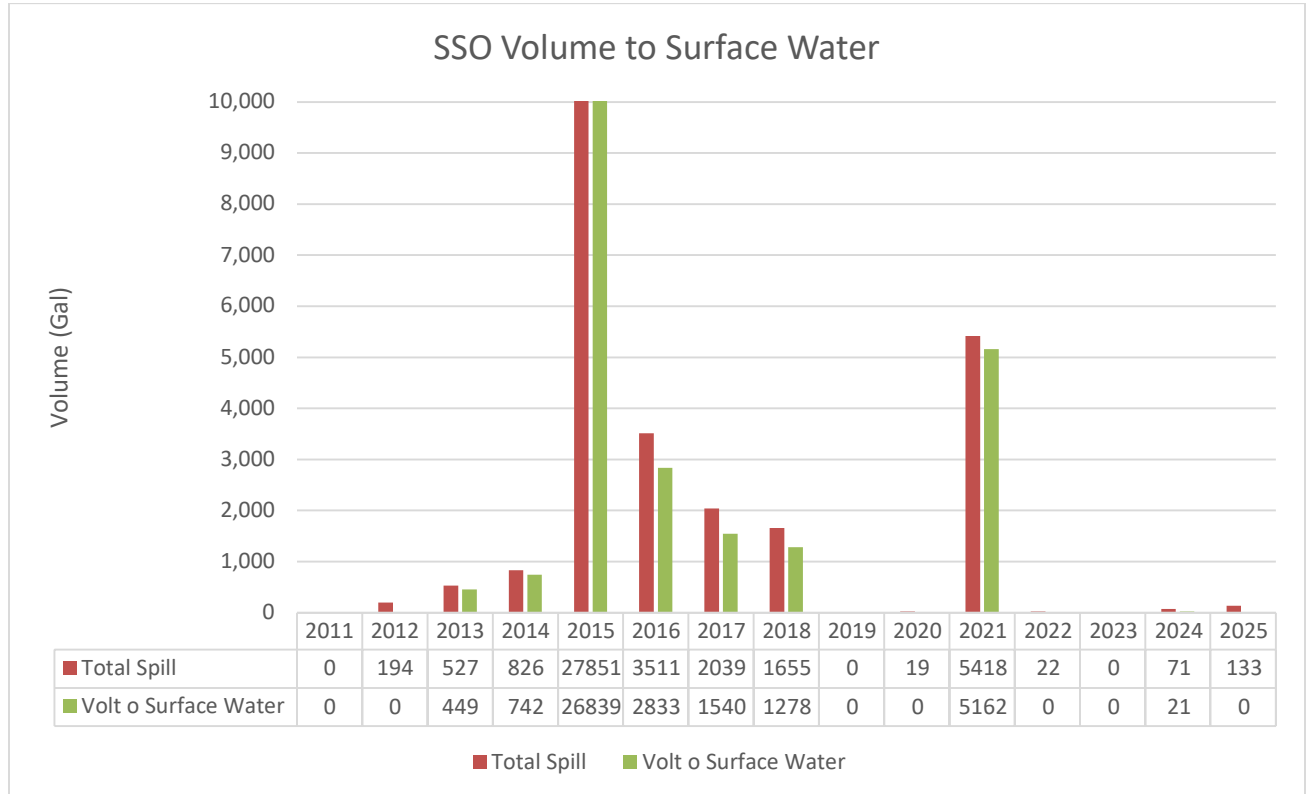


Figure IX – 4: Overflows by SWRCB Categories per Calendar Year

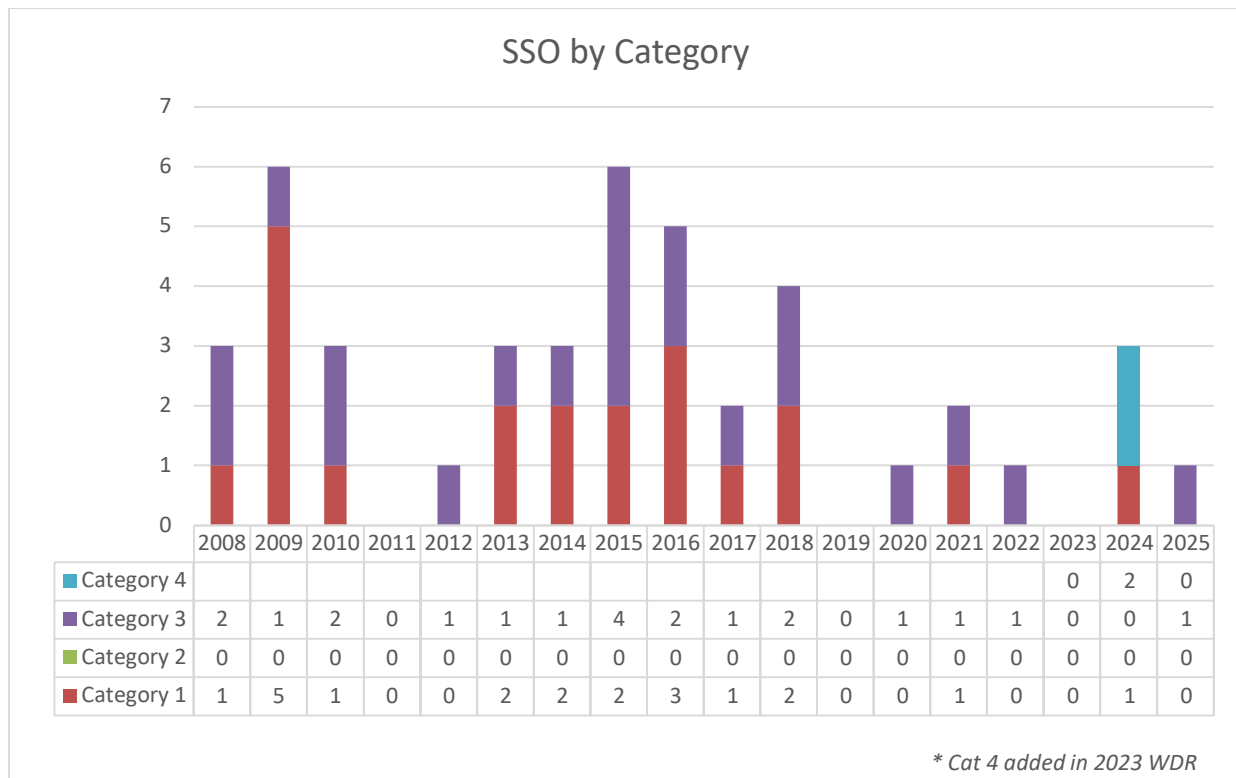


Figure IX – 5: Comparison of SSO Rate per 100 Miles of Sewers

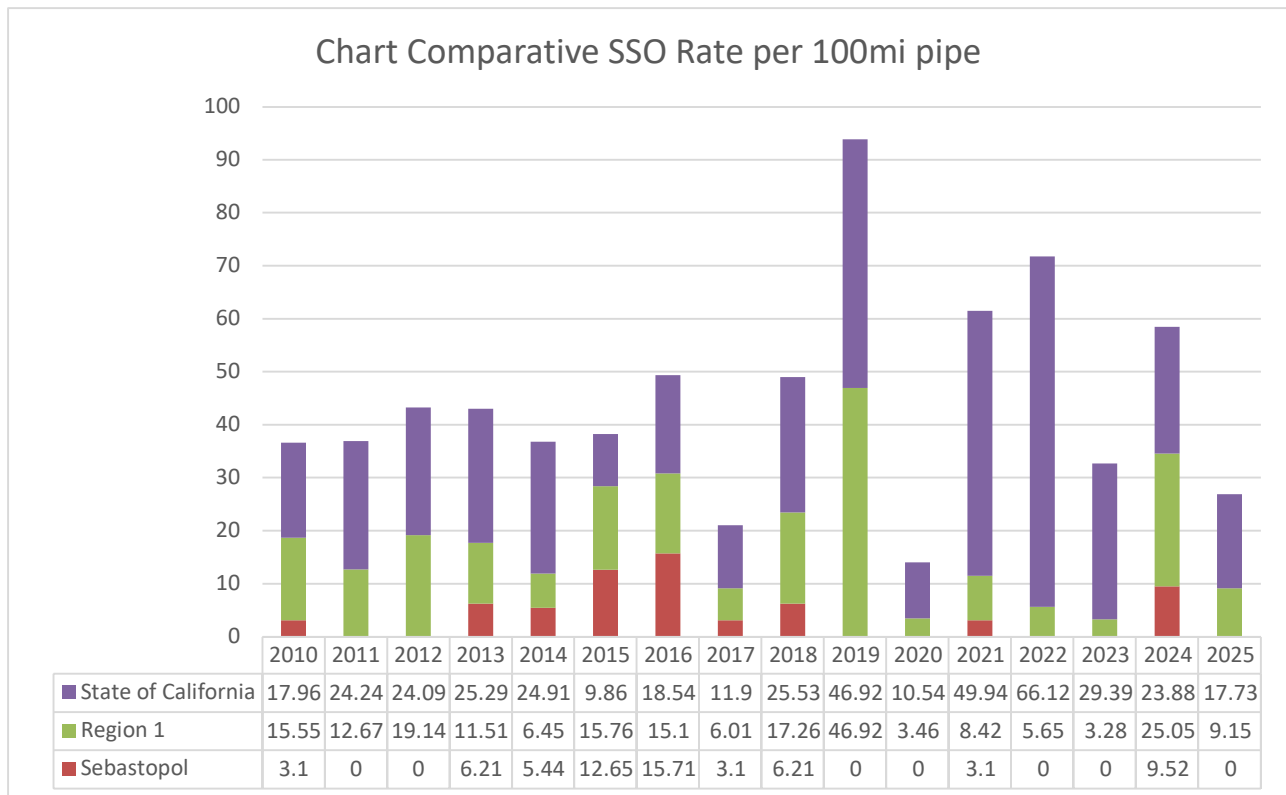


Figure IX – 6: Historical Line Cleaning Summary

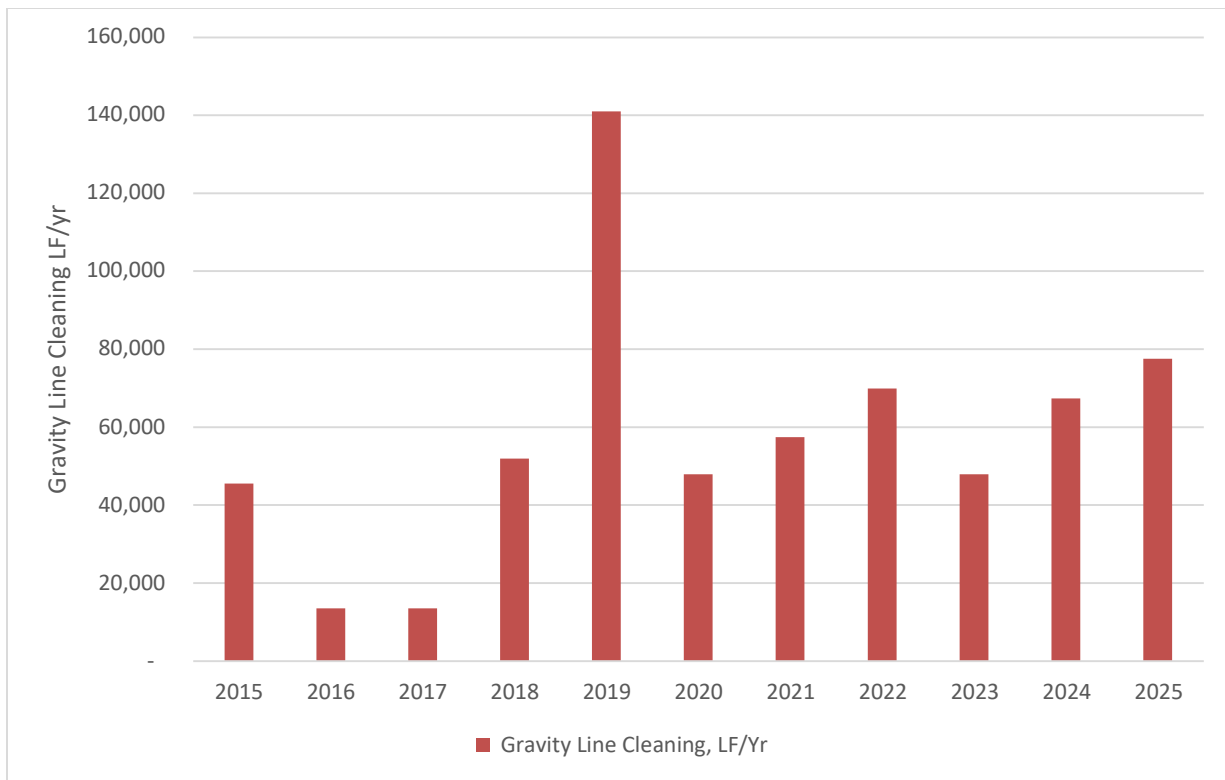
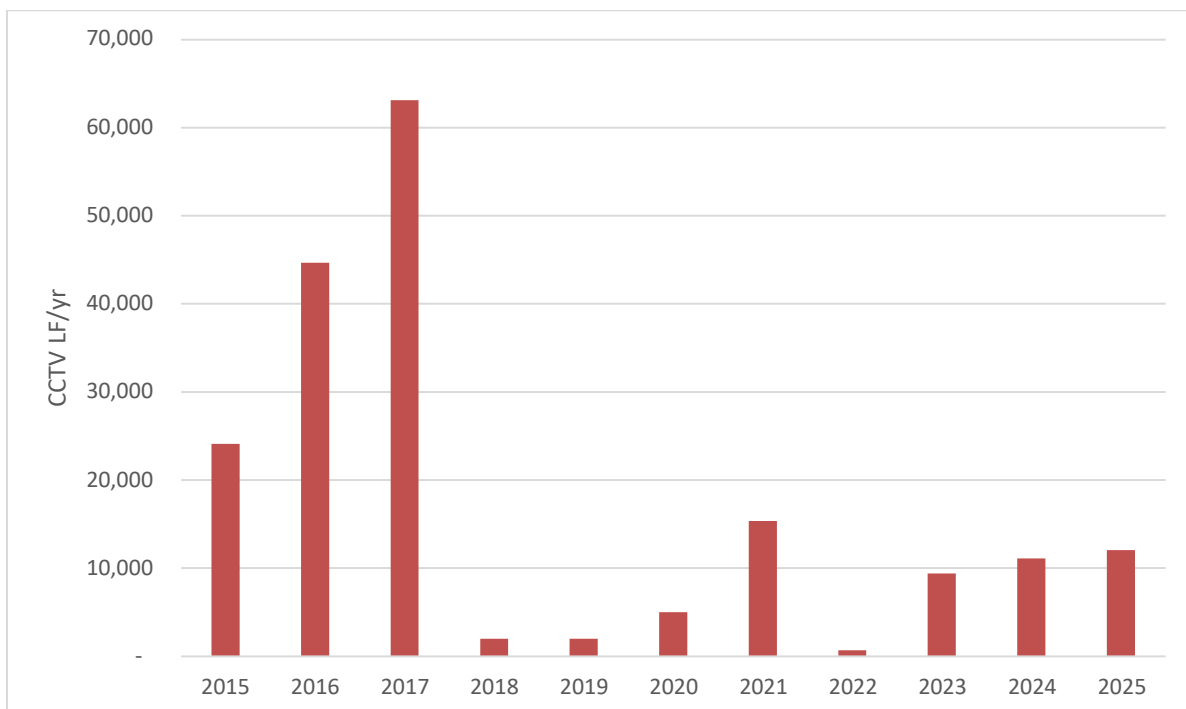


Figure IX – 7: Historical CCTV Performance



IX-4: Performance Monitoring and Program Changes

The City will evaluate the performance of its sewer collection system at least annually using the performance measures identified in this Element. The City will update the data and analysis at the time of the annual evaluation and will place an Annual Performance Report on a Council agenda and after approval on the SSMP webpage.

The City may use other performance measures in its evaluations. The City will prioritize its actions and initiate changes to this SSMP, its operations and maintenance practices and procedures, and any related programs based on the results of these evaluations. This will be done as part of the biannual internal audit (see Element X).

IX-5: References

The data used in this section were taken from the following references:

- CIWQS SSO data as of 6/30/25 for WDID 1SSO10017
- City collection system performance records available in the Public Works offices.

Element X: SSMP Program Audits

SSMP Program Audits - As part of the SSMP, the Enrollee 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 three 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. Audit findings shall be used to evaluate program effectiveness, identify opportunities for improvement, and support updates to the SSMP as necessary.

X-1: Audits

The City will audit its implementation, effectiveness, and compliance with the provisions of this SSMP and GWDR at least every three years from the original SSMP adoption date of August 3, 2010. A team consisting of City Staff selected from the Public Works Department will conduct the audit. The audit team may include members from other areas of the City, outside agencies, or contractors and will involve discussions and evaluation of the City of Santa Rosa's handling of the FOG and industrial pretreatment program pursuant to Element 7 of this SSMP.

It is also recommended that along with the audit the City conduct a recordkeeping audit of its SSO files to assure that the files are complete, contain all required records as stated in the MRP and that the files contain no extraneous or conflicting documents that are not adequately reviewed and explanations provided. It is also recommended that the City staff review all data submitted to the SWRCB CIWQS database regularly to assure compliance with the regulations and to confirm that all required data has been submitted and certified as required and that there are no mistakes in the certified data.

The Sewer System Management Plan Audit Report Checklist (Appendix C) is used to guide the audit process and includes the GGWDR requirements for each SSMP element. The results of the audit, including the identification of any deficiencies and the actions taken or planned to correct them will be included in a certified Audit Report along with the designation of the persons responsible for completing the identified actions. Upon completion of the audit, the City will include a copy of the Audit Report in Appendix B, Sewer System Annual Reports of this SSMP. Modifications and changes to the SSMP will be identified and tracked in Appendix D, SSMP Change Log.

The audit can contain information about successes in implementing the most recent version of the SSMP and identify revisions to enhance the effectiveness of the City program. Information collected as part of Element IX above should be used in preparing the audit. Tables and figures or charts can be used to summarize information about these indicators. An explanation of the SSMP implementation, and effectiveness in improving the sewer system, should be included in the audit, including:

- How the City implemented SSMP elements in the past year;
- The effectiveness of implementing SSMP elements;
- A description of the additions and improvements made to the sanitary sewer collection system operations and system rehabilitation in the past reporting period; and
- A description of the additions and improvements planned for the upcoming audit period or recertification period with an estimated schedule and cost estimates for implementation of the changes

X-2: SSMP Updates

The City will update and seek recertification with the City Council of its SSMP at least every five years from the original adoption date of August 2010 or when substantial changes are made in the SSMP that increases the overall collection system budget.

The City will determine the need to update its SSMP more frequently based on the results of the biannual audit and the performance of its wastewater collection system using information from Element IX, Monitoring and Measurement and Modification Program. In the event that the City decides that an update is warranted, the process and schedule to complete the update will be identified. The City will complete the SSMP update within one year of identifying the need for the update.

X-3: References:

None.

Element XI: Communication Program

Communication Program – The Enrollee 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 does not own, operate, or receive flow from any publicly owned satellite collection systems. The City shall coordinate with

XI-1: Communication during SSMP Implementation and Performance

The City makes the SSMP and all critical supporting documents available on the City website and copies can be obtained from the Public Works office. Hard copies are available to the City Council and will be considered and recertified as required by the GWDR at least every five (5) years from the original adoption date by the City Council or when substantial changes are implemented. The public can obtain copies either from the Utilities webpage or by purchase at the Department of Public Works

In addition, the City website will include a link to the Santa Rosa Subregional Water Reclamation FOG Control Program for residential and commercial customers' information and use. Finally, the City staff will communicate regularly with the Director of Utilities at the City of Santa Rosa regarding the FOG programs performance and FOG communications.

XI-2: Communicating Sanitary Sewer System Performance

Annually, no later than November of each year, the City Council will receive a report of the sanitary sewer system performance results at a regularly scheduled meeting and the performance information will be included in the minutes of that public meeting and placed on the website for public information. The performance information will include the results of each of the performance measures listed in Element IX: Monitoring, Measurement, and Program Modifications.

The City has also included website link to the State Water Resources Control Board CIWQS SSO Public Reports website where interested parties can find information regarding the City collection system utilizing the City WDID of 1SSO10017. In addition, the City also has a 24-hour, 7 days per week emergency hotline on the City's website that can be used to report sewer related issues. The phone contact number is 707-829-4400.

XI-3: Source Control Systems

The City works closely with the Santa Rosa Subregional Water Reclamation staff and participates in all outreach programs related to FOG source control and industrial waste.

XI-4: References:

None.

Appendices

Appendix A: Sewer System Management Plan Adoption Documents

Appendix B: Sewer System Management Audit Reports

Appendix C: Sewer System Management Audit Checklist

Appendix D: Sewer System Management Plan Change Log

Appendix E: Spill Emergency Response Plan (SERP)

Appendix F: Water Quality Monitoring Plan

Appendix A
Sewer System Management Plan Adoptions Document –
2020, to be revised Sept, 2026

Appendix B
Sewer System Management Plan Audit Reports

Appendix C
Sewer System Management Audit Checklist

Appendix D
Sewer System Management Plan Change Log

Appendix D: Sewer System Management Plan Change Log

Appendix D: Sewer System Management Plan Change Log

LOG OF SSMP CHANGES			
Date	SSMP Element #	Description of Change / Revision Made	Person Authorizing Change
10-13-2022	II	Page 14, staff changes	Del Prete
10-13-2022	II	Page 16 & 17, staff changes	Del Prete
10-13-2022	III	Page 72, City name correction	Del Prete
10-13-2022	III	Page 76, delete D & E, not applicable	Del Prete
10-13-2022	XI	Page 71, added annual reports 2021 & 2022	Del Prete
07-03-2025	II	Page 14, staff changes	Mark Rincon
09-01-2025	II	Page 14, staff changes	Erik Billing
07/15/2026	II	Page 14, staff changes	Oriana Hart

Appendix E
Spill Emergency Response Plan (SERP)

City of Sebastopol

Sewer Spill Emergency Response Plan

Effective Date: 09/21/2023

Revised Date: 07/27/2026

Approved by: _____

Signature: _____

Date: _____

Prepared by: David Patzer

DKF Solutions Group, LLC

dpatzer@dkfsolutions.com

Revised by: Oriana Hart - City of Sebastopol



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This Spill Emergency Response Plan (SERP) is licensed to the City of Sebastopol for internal use only beginning on the effective date listed above. All right, title and interest in the SERP, including without limitation, any copyright, shall remain with DKF Solutions Group, LLC. The City of Sebastopol is granted a non-exclusive right to copy the SERP for use by City of Sebastopol personnel only. The SERP as customized for the City of Sebastopol is a public document and may be posted on the City's website or otherwise presented in a non-editable format for public view. The SERP may not, in whole or in part, be shared in an editable format with another entity other than the City of Sebastopol including, but not limited to, contractors, vendors, private companies, or other public agencies. In no case can the SERP be shared or posted online in an editable format. This document should not be construed as legal advice to any individual or agency that may use it.

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1. PURPOSE

The purpose of the City of Sebastopol Spill Emergency Response Plan (SERP) is to support a prompt, orderly and effective response to spills (sanitary), reduce spill volumes, and collect information for prevention of future spills. A “spill” in this document is defined, by State Water Board Order No. WQ 2022-0103-DWQ as a discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system overflow, operational failure, and/or infrastructure failure.

The SERP provides guidelines for City personnel to follow in responding to, cleaning up, reporting, and properly documenting spills that may occur within the City’s service area. This SERP satisfies the State Water Board Order No. WQ 2022-0103-DWQ, which require wastewater collection agencies to have a Spill Emergency Response Plan.

Additionally, the SERP outlines procedures for responding to sanitary sewer spill backups into structures as required by the City’s insurer. “Backup” is a term typically used by insurers to describe property damage resulting from exposure and contact to untreated or partially treated sewage.

2. POLICY

The City’s employees are required to report all spills from agency owned sewer mains and publicly owned laterals found and to take the appropriate action to secure the spill area, properly report to the appropriate regulatory agencies, relieve the cause of the spill, and ensure that the affected area is cleaned as soon as possible to minimize health hazards to the public and protect the environment. The City’s goal is to respond to sewer system spills as soon as possible following notification. The City will follow reporting procedures regarding sewer spills as set forth by the San Francisco Regional Water Quality Control Board and the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

3. DEFINITIONS AS USED IN THIS SERP

ANNUAL REPORT: An Annual Report (previously termed as Collection System Questionnaire in previous State Water Board Order No. 2006-0003-DWQ) is a mandatory report in which the City provides a calendar-year update of its efforts to prevent spills.

BASIN PLAN: A Basin Plan is a water quality control plan specific to a Regional Water Quality Control Board (Regional Water Board), that serves as regulations to: (1) define and designate beneficial uses of surface and groundwaters, (2) establish water quality objectives for protection of beneficial uses, and (3) provide implementation measures.

BENEFICIAL USES: The term “Beneficial Uses” is a Water Code term, defined as the uses of the waters of the State that may be protected against water quality degradation. Examples of beneficial uses include but are not limited to, municipal, domestic, agricultural, and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves.

CALIFORNIA INTEGRATED WATER QUALITY SYSTEM (CIWQS): CIWQS is the statewide database that provides for mandatory electronic reporting as required in State and Regional Water Board-issued waste discharge requirements.

DATA SUBMITTER: A Data Submitter is an individual designated and authorized by the City’s Legally Responsible Official to enter spill data into the online CIWQS Sanitary Sewer System Database. A Data Submitter does not have the authority of a Legally Responsible Official to certify reporting entered into the online CIWQS Sanitary Sewer System Database.

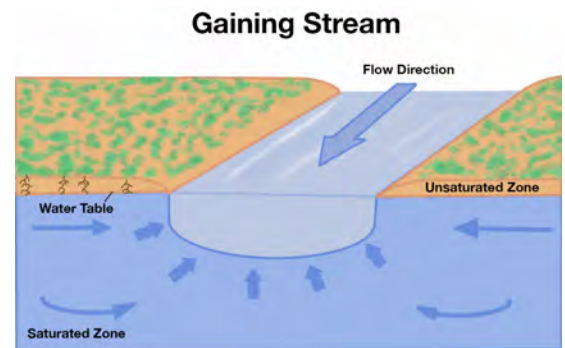
DRAINAGE CONVEYANCE SYSTEM: A drainage conveyance system is a publicly- or privately-owned separate storm sewer system, including but not limited to drainage canals, channels, pipelines, pump stations, detention basins, infiltration basins/facilities, or other facilities constructed to transport stormwater and non-stormwater flows.

ENVIRONMENTALLY SENSITIVE AREA: An environmentally sensitive area is a designated agricultural and/or wildlife area identified to need special natural landscape protection due to its wildlife or historical value.

EXFILTRATION: Exfiltration is the underground exiting of sewage from a sanitary sewer system through cracks, offset or separated joints, or failed infrastructure due to corrosion or other factors.

FOG – Fats, Oils, and Grease: Refers to fats, oils, and grease typically associated with food preparation and cooking activities that can cause blockages in the sanitary sewer system.

HYDROLOGICALLY CONNECTED: Two waterbodies are hydrologically connected when one waterbody flows, or has the potential to flow, into the other waterbody. For the purpose of the SWRCB Order, groundwater is hydrologically connected to a surface water when the groundwater feeds into the surface water. See image, right. The surface waterbody in this example is termed a gaining stream as it gains flow from surrounding groundwater.



LATERAL (INCLUDING LOWER AND UPPER LATERAL): A lateral is an underground segment of smaller diameter pipe that transports sewage from a customer's building or property (residential, commercial, or industrial) to the City's main sewer line in a street or easement. Upper and lower lateral boundary definitions are subject to local jurisdictional codes and ordinances, or private system ownership. A lower lateral is the portion of the lateral located between the sanitary sewer system main, and either the property line, sewer clean out, curb line, established utility easement boundary, or other jurisdictional locations. An upper lateral is the portion of the lateral from the property line, sewer clean out, curb line, established utility easement boundary, or other jurisdictional locations, to the building or property.

LEGALLY RESPONSIBLE OFFICIAL: A Legally Responsible Official is an official representative, designated by the City, with authority to sign and certify submitted information and documents required by State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

MAINLINE SEWER: Refers to City wastewater collection system piping downstream of the sewer laterals that is not a private sewer lateral connection to a building.

MAINTENANCE HOLE OR MANHOLE: Refers to an engineered structure that is intended to provide access to a sanitary sewer for maintenance and inspection

NOTIFICATION OF A SPILL: Refers to the time at which the City becomes aware of a spill event through observation or notification by the public or other source.

NUISANCE: For the purpose of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), a nuisance, as defined in Water Code section 13050(m), is anything that meets all of the following requirements:

- Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property;
- Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal; and

- Occurs during, or as a result of, the treatment or disposal of wastes.

PREVENTATIVE MAINTENANCE: Refers to maintenance activities intended to prevent failures of the wastewater collection system facilities (e.g. cleaning, CCTV, inspection).

PRIVATE LATERAL SEWAGE SPILL – Spills that are caused by blockages or other problems within a privately-owned lateral.

PRIVATE SANITARY SEWER SYSTEM: A private sanitary sewer system is a sanitary sewer system of any size that is owned and/or operated by a private individual, company, corporation, or organization. A private sanitary sewer system may or may not connect into a publicly owned sanitary sewer system.

PRIVATE SEWER LATERAL: A private sewer lateral is the privately-owned lateral that transports sewage from private property(ies) into a sanitary sewer system.

POTENTIAL TO DISCHARGE, POTENTIAL DISCHARGE: Potential to Discharge, or Potential Discharge, means any exiting of sewage from a sanitary sewer system which can reasonably be expected to discharge into a water of the State based on the size of the sewage spill, proximity to a drainage conveyance system, and the nature of the surrounding environment.

RECEIVING WATER: A receiving water is a water of the State that receives a discharge of waste.

SANITARY SEWER SYSTEM: A sanitary sewer system is a system that is designed to convey sewage, including but not limited to, pipes, manholes, pump stations, siphons, wet wells, diversion structures and/or other pertinent infrastructure, upstream of a wastewater treatment plant headworks, including:

- Laterals owned and/or operated by the City;
- Satellite sewer systems; and/or
- Temporary conveyance and storage facilities, including but not limited to temporary piping, vaults, construction trenches, wet wells, impoundments, tanks, and diversion structures.

For purpose of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), sanitary sewer systems include only systems owned and/or operated by the City.

SATELLITE SEWER SYSTEM: A satellite sewer system is a portion of a sanitary sewer system owned or operated by a different owner than the owner of the downstream wastewater treatment facility ultimately treating the sewage.

SEWAGE: Sewage, and its associated wastewater, 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 storm-water or groundwater, conveyed in a sanitary sewer system.

SEWER BACKUP A sanitary sewer spill resulting from a sanitary sewer system overflow, operational failure, and/or infrastructure failure in a publicly owned sewer system, with an appearance point and subsequent discharge into a structure.

SPILL: A spill is a discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system overflow, operational failure, and/or infrastructure failure. Exfiltration of sewage is not considered to be a spill under the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR) if the exfiltrated sewage remains in the subsurface and does not reach a surface water of the State.

- **Category 1 Spill:**

A Category 1 spill is a spill of any volume of sewage from or caused by a sanitary sewer system regulated under the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR) that results in a discharge to:

- A surface water, including a surface water body that contains no flow or volume of water; or
- A drainage conveyance system that discharges to surface waters when the sewage is not fully captured and returned to the sanitary sewer system or disposed of properly.

Any spill volume not recovered from a drainage conveyance system is considered a discharge to surface water, unless the drainage conveyance system discharges to a dedicated stormwater infiltration basin or facility.

A spill from a City-owned and/or operated lateral that discharges to a surface water is a Category 1 spill; the City shall report all Category 1 spills per section 3.1 of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirements) of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

- **Category 2 Spill**

A Category 2 spill is a spill of 1,000 gallons or greater, from or caused by a sanitary sewer system regulated under the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR) that does not discharge to a surface water. A spill of 1,000 gallons or greater that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system, is a Category 2 spill.

- **Category 3 Spill**

A Category 3 spill is a spill of equal to or greater than 50 gallons and less than 1,000 gallons, from or caused by a sanitary sewer system regulated under the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR) that does not discharge to a surface water. A spill of equal to or greater than 50 gallons and less than 1,000 gallons, that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 3 spill.

- **Category 4 Spill**

A Category 4 spill is a spill of less than 50 gallons, from or caused by a sanitary sewer system regulated under the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR) that does not discharge to a surface water. A spill of less than 50 gallons that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 4 spill.

TRAINING: Training is in-house or external education and guidance needed that provides the knowledge, skills, and abilities to comply with the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

WASH DOWN WATER: Wash down water is water used to clean a spill area.

WASTE: Waste, as defined in Water Code section 13050(d), includes sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for purposes of, disposal.

WATERS OF THE STATE: Waters of the State are surface waters or groundwater within boundaries of the state as defined in Water Code section 13050(e), in which the State and Regional Water Boards have authority to protect beneficial uses. Waters of the State include, but are not limited to, groundwater aquifers, surface

waters, saline waters, natural washes and pools, wetlands, sloughs, and estuaries, regardless of flow or whether water exists during dry conditions. Waters of the State include waters of the United States.

WATERS OF THE UNITED STATES: Waters of the United States are surface waters or waterbodies that are subject to federal jurisdiction in accordance with the Clean Water Act.

WATER QUALITY OBJECTIVE: A water quality objective is the limit or maximum amount of pollutant, waste constituent or characteristic, or parameter level established in statewide water quality control plans and Regional Water Boards' Basin Plans, for the reasonable protection of beneficial uses of surface waters and groundwater and the prevention of nuisance.

4. STATE REGULATORY REQUIREMENTS FOR ELEMENT 6, SPILL EMERGENCY RESPONSE PLAN

The Sewer System Management Plan (SSMP) must include an up to date Spill Emergency Response Plan (SERP) to ensure prompt detection of and response to spills to reduce spill volumes and collect information for prevention of future spills. The SERP must include procedures to:

- Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;
- Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;
- Comply with the notification, monitoring and reporting requirements of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), State law and regulations, and applicable Regional Water Board Orders;
- Ensure that appropriate staff and contractors implement the SERP and are appropriately trained;
- Address emergency system operations, traffic control and other necessary response activities;
- Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;
- Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;
- Remove sewage from the drainage conveyance system;
- Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;
- Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;
- Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;
- Conduct post-spill assessments of spill response activities;
- Document and report spill events as required in State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR); and
- Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update it as needed.

The Sewer System Management Plan is available to the public at [https://ci.sebastopol.ca.us/water-sewer/#:~:text=Report%20Sanitary%20Sewer%20Overflows%2024,\(707\)%20829%2D4400..](https://ci.sebastopol.ca.us/water-sewer/#:~:text=Report%20Sanitary%20Sewer%20Overflows%2024,(707)%20829%2D4400..)

5. SPILL EMERGENCY RESPONSE PLAN OBJECTIVES

The Spill Emergency Response Plan includes measures to protect public health and the environment. The City will respond to spills from its system(s) in a timely manner that minimizes water quality impacts and nuisance by:

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

Additionally, City Staff will:

- Work safely;
- Properly document each spill event in a separate file including photos and/or video where applicable;
- Collect information for prevention of future spills;
- Minimize public contact with the spilled wastewater;
- Mitigate the impact of the spill;
- Meet the regulatory reporting requirements;
- Evaluate the causes of failure related to spills;
- Perform post-spill response evaluation for adherence to procedures and effectiveness of response; and
- Revise response procedures, modify maintenance practices or provide additional training based on the results from the debrief and failure analysis of spills, if needed.

6. SPILL DETECTION AND NOTIFICATION

ref. State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), ATTACHMENT D, Element 6, Page D-6

The processes that are employed to notify the City of the occurrence of a spill include: observation by the public, receipt of an alarm, or observation by City staff during the normal course of their work.

6.1 LIFT STATION ALARMS

The City operates 2 wastewater lift stations. In the event of a station failure the SCADA alarm system is activated and the City is contacted. To prevent spills, wastewater from the wet well can either be pumped into a vacuum truck for disposal to a nearby sanitary sewer manhole or bypassed around the station into the sanitary sewer system.

6.2 PUBLIC OBSERVATION

Public observation is the most common way that the City is notified of blockages and spills. Contact numbers and information for reporting sewer spills and backups are on the City's website: [https://ci.sebastopol.ca.us/water-sewer/#:~:text=Report%20Sanitary%20Sewer%20Overflows%2024,\(707\)%20829%2D4400](https://ci.sebastopol.ca.us/water-sewer/#:~:text=Report%20Sanitary%20Sewer%20Overflows%2024,(707)%20829%2D4400). The City's telephone number for reporting sewer problems during office hours is (707) 823-5331, after hours phone number is (707) 829-4400.

- Normal Work Hours: When a report of a sewer spill or backup is made during normal work hours, City staff receives the call, takes the information from the caller, and communicates it to the City Maintenance Workers.
- After Hours: When customers call the sewer problem reporting telephone number, they hear a voicemail recording that directs them to call Police dispatch at (707) 829-4400. Dispatch then receives the call and notifies the Standby Employee.

When calls are received, either during normal work hours or after hours, the individual receiving the call will collect and include in the spill event file, at a minimum, the following information to record the complaint:

- Date, time, and method of notification,
- Date and time the complainant first noticed the spill, if available,
- Narrative description of the complaint, including any information the caller provided regarding whether the spill has reached surface waters or a drainage conveyance system, if available,
- Complainant's contact information, if available, and
- Final resolution of the complaint.

If the spill or backup is not in the City's service area the individual receiving the call provides the customer with the contact information for the responsible agency, and then notifies that agency.

If the spill or backup is in the City's service area, the Maintenance Workers (during business hours) or standby employee (after hours) will respond to the address of the complaint and do an investigation. If the complaint is not a spill, the crew members' findings and actions taken, if any, are logged into the City Computerized Maintenance Management System (CMMS) using a field laptop if available. If a field laptop is not available, the information will be entered into the CMMS when the employee returns to the City.

If the complaint is a spill, the crew member will complete the Sanitary Sewer Spill and Backup Response Workbook and then enter the findings and actions taken into the City's CMMS.

6.3 CITY STAFF OBSERVATION

City staff conducts periodic inspections of its sewer system facilities as part of their routine activities. Any problems noted with the sewer system facilities are reported to appropriate City staff that, in turn, responds to emergency situations. Work orders are issued to correct non-emergency conditions.

6.4 CONTRACTOR OBSERVATION

Contractors working on the City sewer system will be informed of contractor spill response procedures. Contractors working on behalf of property owners will be provided spill response information by the Building Department when they pull a permit. The following procedures are to be followed in the event that a contractor/plumber causes or witnesses a sanitary sewer spill. If the contractor/plumber causes or witnesses a spill they should:

1. Immediately notify the City at (707) 823-5331 during business hours, after hours phone number is (707) 829-4400 and provide the following information if available:
 - a. Date, time contractor first noticed the spill
 - b. Description of the contractor's observation, including any information regarding whether the spill has reached surface waters or a drainage conveyance system

- c. Contractor's contact information
2. Protect storm drains.
3. Protect the public.
4. Direct ALL media and public relations requests to the City Manager.

6.5 NO OBSERVATION

If there are no witnesses or no call was received for a spill, the City staff will contact nearby residences or business owners in the vicinity of the spill, in an attempt to obtain information that brackets a given start time that the spill began. This information will be collected and documented on the Sanitary Sewer Spill Report in the Sanitary Sewer Spill/Backup Response Workbook.

7. SPILL RESPONSE PROCEDURES (Ref. State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), ATTACHMENT D Element 6 page D-6)

7.1 SEWER SPILL/BACKUP RESPONSE SUMMARY

The City will respond to spills as soon as feasible following notification of a spill/backup.

If it is not possible that the spill/backup is due to a failure in the City-owned/maintained sewer lines the Maintenance Workers performs the following:

- Follows the instructions in the Sanitary Sewer Spill/Backup Response Workbook.
- If the customer is not home the Maintenance Workers completes the Door Hanger and leaves it on the customer's door.
- If the customer is home the Maintenance Workers:
 - Explains that the blockage is in the customer's lateral and the City does not have legal authority to maintain or perform work on privately owned laterals.
 - Recommends to the customer that they hire a licensed contractor to clear their line.
 - Gives the customer the Your Responsibilities as a Private Property Owner pages from the Sanitary Sewer Spill/Backup Response Workbook.

If it is possible that the spill/backup is due to a failure in the City-owned/maintained sewer lines the Maintenance Workers:

- Follows the instructions in the Sanitary Sewer Spill/Backup Response Workbook.
- Notifies Public Works Superintendent and/or the Assistant Public Works Superintendent of the incident.
- Relieves blockage and cleans impacted areas.
- Forwards the completed Sanitary Sewer Spill/Backup Response Workbook to the Public Works Superintendent and/or the Assistant Public Works Superintendent.

The Public Works Director, Public Works Operations Supervisor, City Manager, and City Attorney performs required regulatory reporting in accordance with the Sanitary Sewer Spill/Backup Response Workbook's Regulatory Reporting section.

If the overflow has impacted private property, the Maintenance Workers:

- Follows the instructions in the Sanitary Sewer Spill/Backup Response Workbook.
- Provides the customer with forms and information as indicated in the Sanitary Sewer Spill/Backup Response Workbook.
- Forwards the completed Sanitary Sewer Spill/Backup Response Workbook to the Public Works Superintendent and/or the Assistant Public Works Superintendent.

The Public Works Superintendent and/or the Assistant Public Works Superintendent notifies the City Clerk of incident.

The City Clerk or designee:

- Reviews incident reports, claim form and other incident information and forwards, as appropriate, to George Hills.
- Communicates with claimant as appropriate.
- Communicates with George Hills to adjust and administer the claim to closure.
- Properly documents in writing all activities and communications before approving the final event file.

7.2 FIRST RESPONDER PRIORITIES

The first responder's priorities are:

- Prompt response to spills.
- To follow safe work practices.
- To respond promptly with the appropriate and necessary equipment.
- To reduce spill volume and contain the spill wherever feasible.
- To restore the flow as soon as practicable.
- To minimize public access to and/or contact with the spilled sewage.
- To promptly notify the Public Works Superintendent and/or the Assistant Public Works Superintendent in event of a spill needing additional resources, and/or impacting environmentally sensitive areas.
- To return the spilled sewage to the sewer system.
- To restore the area to its original condition (or as close as possible). Collect information for the prevention of future spills.
- Properly document the spill and response activities on the forms provided in the Sanitary Sewer Spill/Backup Response Workbook, including photos and/or video where practicable.

7.3 SAFETY

The first responder is responsible for following safety procedures at all times. Special safety precautions must be observed when performing sewer work. There may be times when City personnel responding to a sewer system

event are not familiar with potential safety hazards peculiar to sewer work. In such cases it is appropriate to take the time to discuss safety issues, consider the order of work, and check safety equipment before beginning response activities.

If the first responders encounter access restrictions or unsafe conditions that prevent its compliance with spill response requirements or monitoring requirements in State Water Board Order No. WQ 2022-0103-DWQ (SSS-WDR), the City provides written documentation of access restrictions and/or safety hazards in the corresponding required report.

7.4 INITIAL RESPONSE

The first responder must respond to the site of the spill/backup and visually check for potential sewer stoppages. The first responder will:

- Note arrival time at the site of the spill/backup.
- Verify the existence of a public sewer system spill or backup.
- Identify and assess the affected area and extent of spill.
- Assess the spill location(s) and spread using photography, global positioning system (GPS), and other best available tools.
- Contact caller if time permits.
- Document the spill according to the requirements described in Section 10 of this SERP, including taking photos and/or videos of overflowing manhole(s)/cleanout(s).
- Take steps to contain, recover, and return the spill to the sanitary sewer as feasible. For procedures refer to the Sanitary Sewer Spill/Backup Response Workbook.
- Protect surface waters to the extent practicable. For procedures refer to the Sanitary Sewer Spill/Backup Response Workbook.
- Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event.

7.5 INITIATE SPILL CONTAINMENT MEASURES

The first responder will attempt to contain as much of the spilled sewage as possible using the following steps:

- Determine the immediate destination of the overflowing sewage.
- Plug storm drains using air plugs, sandbags, and/or plastic mats to contain the spill, whenever appropriate. If spilled sewage has made contact with the storm drainage system, attempt to contain the spilled sewage by plugging downstream storm drainage facilities.
- Contain/direct the spilled sewage using dike/dam or sandbags.
- Vacuum retrieve sewage whenever practicable.
- Pump around the blockage/pipe failure.

Containment efforts will be documented. For procedures refer to the Sanitary Sewer Spill/Backup Response Workbook.

7.6 RESTORE FLOW

Using the appropriate cleaning equipment, set up downstream of the blockage and hydro-clean upstream from a clear manhole. Attempt to remove the blockage from the system and observe the flows to ensure that the blockage does not reoccur downstream. If the blockage cannot be cleared within a reasonable time from arrival, or sewer requires construction repairs to restore flow, then initiate containment and/or bypass pumping. If other assistance is required, immediately contact Public Works Superintendent and/or the Assistant Public Works Superintendent. For procedures refer to the Sanitary Sewer Spill/Backup Response Workbook.

7.7 EQUIPMENT

This section provides a list of specialized equipment that may be used to support this Spill Emergency Response Plan.

- *Closed Circuit Television (CCTV) Inspection Unit* – A CCTV Inspection Unit is required to determine the root cause for all spills from gravity sewers.
- *Camera* -- A digital or disposable camera (photo, video or phone) is required to record the conditions upon arrival, during clean up, and upon departure.
- *Emergency Response Trucks* -- A utility body pickup truck, or open bed is required to store and transport the equipment needed to effectively respond to sewer emergencies. The equipment and tools will include containment and clean up materials.
- *Portable Generators, Portable Pumps, Piping, and Hoses* – Equipment used to bypass pump, divert, or power equipment to mitigate a spill.
- *Combination Sewer Cleaning Trucks* -- Combination high velocity sewer cleaning trucks with vacuum tanks are required to clear blockages in gravity sewers, vacuum spilled sewage, and wash down the impacted area following the spill event.
- *Rodding (snake) equipment for responding to lateral blockages.*
- *Air plugs, sandbags and plastic mats*
- *Spill Sampling Kits*
- *Portable Lights*

Standard operating procedures for equipment that may be necessary in the event of a sanitary sewer overflow or backup can be found in the Public Works and Public Services S-Drive.

8. RECOVERY AND CLEANUP (Ref. State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), *Element 6, ATTACHMENT D, Page D-6*)

The recovery and cleanup phase begins immediately after the flow has been restored and the spilled sewage has been contained to the extent possible. The spill recovery and cleanup procedures are described in the following sections.

8.1 ESTIMATE THE FLOW AND VOLUME OF SPILLED SEWAGE

A variety of approaches exist for estimating the volume of a sanitary sewer spill. The Maintenance Workers members should use the method most appropriate to the sewer overflow in question and reference the Sanitary Sewer Spill/Backup Response Workbook which provides four (4) methods:

- Eyeball Estimation Method
- Duration and Flow Rate Calculation Method
- Area/Volume Method
- Upstream Connections Method

In addition, the following will be documented on the Sewer Spill Report form:

1. 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;
2. Estimated total spill volume exiting the system;
3. Description and photographs of the extent of the spill and spill boundaries;
4. Did the spill reach a drainage conveyance system? If yes:
 - Description of the drainage conveyance system transporting the spill;
 - Photographs of the drainage conveyance system entry location(s);
 - Estimated spill volume that reached the drainage conveyance system;
 - Estimated spill volume fully recovered from the drainage conveyance system;
 - Estimated spill volume remaining within the drainage conveyance system
 - Estimated spill volume discharged to a groundwater infiltration basin or facility, if applicable;
 - Estimated spill travel time from the point of entry into the drainage conveyance system to the point of discharge into the receiving water.
5. Estimated total spill volume recovered.

8.2 RECOVERY OF SPILLED SEWAGE

Vacuum up and/or pump the spilled sewage and wash down water and discharge it back into the sanitary sewer system. Thoroughly recover and dispose of sewage and wash down water.

8.3 CLEAN-UP AND DISINFECTION

Clean up procedures will be implemented to reduce the potential for human health issues and adverse environmental impacts associated with a spill event. The procedures described are for dry weather conditions and will be modified as required for wet weather conditions. Where cleanup is beyond the capabilities of City staff, a cleanup contractor will be used.

Private Property

City crews are responsible for the cleanup when the property damage is minor in nature and is outside of private building dwellings, such as in front, side and backyards, easements, etc. In all other cases, affected property owners can call a water damage restoration contractor to complete the cleanup and restoration. If the overflow into property is the definite cause of City system failure, the property owner can call out a water damage restoration contractor to complete the cleanup and restoration. In both cases, property owners may submit a claim form.

Hard Surface Areas

Collect all signs of sewage solids and sewage-related material either by protected hand or with the use of rakes and brooms. Wash down the affected area with clean water and/or deozyme or similar non-toxic biodegradable surface disinfectant until the water runs clear. The flushing volume will be approximately three times the estimated volume of the spill. Take steps to contain and vacuum up the wastewater. Allow area to dry. Repeat the process if additional cleaning is required.

Landscaped and Unimproved Natural Vegetation

Collect all signs of sewage solids and sewage-related material either by protected hand or with the use of rakes and brooms. Wash down the affected area with clean water until the water runs clear. The flushing volume will be approximately three times the estimated volume of the spill. Either contain or vacuum up the wash water so that none is released. Allow the area to dry. Repeat the process if additional cleaning is required.

Natural Waterways

The Department of Fish and Wildlife will be notified by CalOES for spills greater than or equal to 1,000 gallons. For spills less than 1,000 gallons, contact Sonoma County Environmental Health for direction.

Wet Weather Modifications

Collect all signs of sewage solids and sewage-related material either by protected hand or with the use of rakes and brooms. Omit flushing and sampling during heavy storm events (i.e., sheet of rainwater across paved surfaces) with heavy runoff where flushing is not required and sampling would not provide meaningful results.

8.4 PUBLIC NOTIFICATION

Signs will be posted and barricades put in place to keep vehicles and pedestrians away from contact with spilled sewage. Sonoma County Environmental Health instructions and directions regarding placement and language of public warnings will be followed. Additionally, the Public Works Superintendent and/or the Assistant Public Works Superintendent will use their best judgment regarding supplemental sign placement in order to protect the public and local environment. Signs will not be removed until directed by Sonoma County Environmental Health.

Creeks, streams and beaches that have been contaminated as a result of a spill will be posted at visible access locations until the risk of contamination has subsided to acceptable background bacteria levels. Document the number and location of posted signs. The area and warning signs, once posted, will be checked every day to ensure that they are still in place. Photographs of sign placement will be taken.

In the event that an overflow occurs at night, the location will be inspected first thing the following day. The field crew will look for any signs of sewage solids and sewage-related material that may warrant additional cleanup activities.

When contact with the local media is deemed necessary, the City Clerk or their designee will provide the media with all relevant information.

9. WATER QUALITY (*Ref. State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), Element 6, Attachment A - DEFINITIONS page A-5, Attachment E1 2.3 through 2.4 pages E1-5 through E1-8*)

9.1 SURFACE WATERS OF CONCERN

The following waters of the State are in the City's service area:

- Russian River
- Laguna de Santa Rosa
- Calder Creek
- Zimpher Creek

9.2 WATER QUALITY SAMPLING AND TESTING

For all Category 1 SSOs that reach a surface water or a drainage conveyance that discharges to surface water, the City shall conduct spill-specific monitoring to document the extent of the spill, affected areas, visual observations, photographs, estimated spill volume, response actions, and other information required by the State Water Resources Control Board's Monitoring and Reporting Program (MRP).

The DCS-001 location as described in section 9.5 (Receiving Water Sampling Locations) below, if sewage discharges to a surface water via a drainage conveyance system; and/or

- Each of the three receiving water sampling locations in section 9.5 (Receiving Water Sampling Locations) below;

If the receiving water has no flow during the duration of the spill, the City must report "No Sampling Due To No Flow" for its receiving water sampling locations.

The Maintenance Workers will collect water quality samples in accordance with State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

The Maintenance Workers staff collecting the samples will complete the Chain of Custody prior to transferring ownership of the samples to the City of Santa Rose Treatment Plant.

The lab shall analyze the collected receiving water samples for the following constituents:

- Ammonia, and

- Appropriate bacterial indicator(s) per the applicable Basin Plan water quality objectives, including one or more of the following from the table below, unless directed otherwise by the Regional Water Board: *ref. San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan), November 5, 2019*

Water Quality Objectives for Bacteria ^a				
Beneficial Use	Fecal Coliform ^a (MPN/100mL)	Total Coliform ^a (MPN/100mL)	Enterococcus (CFU/100mL) ^g	E. coli (CFU/100mL) ^g
Water Contact Recreation			geometric mean < 30 STV < 110	geometric mean < 100 STV < 320
Shellfish Harvesting ^b	median < 14 90th percentile < 43	median < 70 90th percentile < 230 ^c		
Non-contact Water Recreation ^d	mean < 2000 90th percentile < 4000	geometric mean < 100		
Municipal Supply: Surface Water ^e	geometric mean < 20			
Municipal Supply: Groundwater		< 1.1 ^f		
Notes: a. Based on a minimum of five consecutive samples equally spaced over a 30-day period. b. Source: National Shellfish Sanitation Program. c. Based on a five-tube decimal dilution test or 300 MPN/100 ml when a three-tube decimal dilution test is used. d. Source: Report of the Committee on Water Quality Criteria, National Technical Advisory Committee, 1968. e. Source: California Department of Public Health recommendation. f. Based on multiple tube fermentation technique; equivalent test results based on other analytical techniques, as specified in the National Primary Drinking Water Regulation, 40 CFR, Part 141.21(f), revised June 10, 1992, are acceptable. g. Numeric values are from Part 3 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California based on Section 7958 of Title 17 of the California Code of Regulations, 69FR 67217 et seq., and 40 CFR Part 131.41 (effective date December 16, 2004). The Enterococcus objective applies to marine and estuarine waters where the salinity is greater than 1 part per thousand more than 5 percent of the time. The E. coli objective applies to freshwaters where the salinity is equal to or less than 1 part per thousand 95 percent or more of the time. The geometric mean for enterococcus and E. coli is computed weekly for all samples in a 6-week interval. There is no fecal coliform objective to protect water contact recreation for inland surface waters, enclosed bays, or estuaries, but a fecal coliform objective protecting this use remains in the California Ocean Plan. The STV is the statistical threshold value and shall not be exceeded by more than 10 percent of the samples collected in a calendar month.				

Dependent on the receiving water(s), sampling of bacterial indicators shall be sufficient to determine post-spill (after the spill) compliance with the water quality objectives and bacterial standards of the California Ocean Plan or the California Inland Surface Water Enclosed Bays, and Estuaries Plan, including the frequency and/or number of post-spill receiving water samples as may be specified in the applicable plans.

The City shall collect and analyze additional samples as required by the applicable Regional Water Board Executive Officer or designee.

9.3 LAB SELECTION

Analytical Lab

Samples collected for spill response and background monitoring purposes will be analyzed at City of Santa Rose Treatment Plant, which is accredited through the California State Water Resources Control Board Environmental Laboratory Accreditation Program (ELAP). ELAP provides evaluation and accreditation of environmental testing laboratories to ensure the quality of analytical data used for regulatory purposes to meet the requirements of the State's drinking water, wastewater, shellfish, food, and hazardous waste programs. The State agencies that monitor the environment use the analytical data from these accredited labs. The ELAP-accredited laboratories have demonstrated capability to analyze environmental samples using approved methods.

Getting Samples to the Lab

At all times, sample hold times identified below will be observed in accordance with the following:

Analytical Parameter	Maximum Holding Time	Required Container Type	Required Preservative	Minimum Amount
Ammonia (NH ₃ as N); SM 4500NH ₃ B/C or B/G	28 days	Plastic / Glass	H ₂ SO ₄ pH <2 +0-6°C	200 mL
Coliform, Total / Fecal; SM 9221 B/E	8 hours – wastewater/storm- water 30 hours – drinking water	Plastic (sterile)	Na ₂ S ₂ O ₃ + 0-10°C; No regulatory temp. req. for drinking water)	100 mL
Coliform, Total / E.Coli; SM 9223 B (Present/Ab- sent or Quantitray)	8 hours	Plastic (sterile)	Na ₂ S ₂ O ₃ + 0-10°C; No regulatory temp. req. for DW	100 mL
Enterococcus by Enter- olert	8 hours	Plastic (sterile)	Na ₂ S ₂ O ₃ + 0-10°C	100 mL

Once samples are collected, they will be transported by the Maintenance Workers to the lab to be processed.

9.4 WATER QUALITY ANALYSIS SPECIFICATIONS

Spill monitoring must be representative of the monitored activity (40 Code of Federal Regulations section 122.41(j)(1)).

Sufficiently Sensitive Methods

Sample analysis must be conducted according to sufficiently sensitive test methods approved under 40 Code of Federal Regulations Part 136 for the sample analysis of pollutants. For the purposes of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), a method is sufficiently sensitive when the minimum level of the analytical method approved under 40 Code of Federal Regulations Part 136 is at or below the receiving water pollutant criteria.

Environmental Laboratory Accreditation Program-Accredited Laboratories

The analysis of water quality samples required per State Water Board Order No. WQ 2022-0103-DWQ (SSS-WDR) must be performed by a laboratory that has accreditation pursuant to Article 3(commencing with section 100825) of Chapter 4 of Part 1 of Division 101 of the Health and Safety Code. (Water Code section 13176(a).) The State Water Board accredits laboratories through its Environmental Laboratory Accreditation Program (ELAP).

9.5 RECEIVING WATER SAMPLING LOCATIONS

Receiving water samples shall be collected at the following locations.

Sampling of Flow in Drainage Conveyance System (DCS) Prior to Discharge

Sampling Location	Sampling Location Description
DCS-001	A point in a drainage conveyance system before the drainage conveyance system flow discharges into a receiving water.

Receiving Surface Water Sampling (RSW)¹

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

9.6 STREAM VELOCITY MEASUREMENTS

If sampling is performed after the spill has stopped, the velocity of the impacted surface water must be determined to estimate spill travel time and select an accurate Downstream sample location. One way to measure the spill travel time is to use a velocity probe (such as a Global Water FP111-S Flow Probe) to determine the rate of flow in the water body. In cases where a water velocity probe is used, the manufacturer's instructions will be followed.

¹ The City must use its best professional judgment to determine the upstream and downstream distances based on receiving water flow, accessibility to upstream/downstream waterbody banks, and size of visible sewage plume.

9.7 SAMPLE TYPES

Grab Samples

Grab samples are appropriate for the characterization of surface waters at a particular time and place, to provide information about minimum and maximum concentrations, and to allow for the collection of variable sample volume.

Grab samples may be collected directly into the sample container, or a clean decontaminated intermediate container may be used if a wading sample is not possible or safe. If an intermediate container is used, when in the field, double rinse the sampling device (bucket, automatic sampler) with sample water prior to collecting the sample and be sure to discard rinse water downstream of where sample will be collected. If samples are collected in a bucket and distributed into a consolidation collection container, swirl the contents of the bucket as it is being poured into the consolidation collection container to avoid settling of solids (and pour in back-and-forth pattern – e.g., 1-2-3-3-2-1).

- Grab Sample: A grab sample is defined as an individual sample collected at a given time. Grab samples represent only the condition that exists at the time the sample is collected (US EPA 1977).
- Surface Grab Sample: A sample collected at the water surface (i.e., skimming) directly into the sample container or into an intermediate container such as a clean bucket. A single or discrete sample collected at a single location.

Field Blanks

Field Blanks are used to evaluate the potential for contamination of a sample by site contaminants from a source not associated with the sample collected (e.g., airborne dust, etc.). Sterile, deionized water is taken into the field in a sealed container. This is the stock water. The stock water is then poured into the sample container. The containers and sample submission forms are labeled as “Field Blank.” The same template selected for the test samples should be used. Field blanks are subject to the same holding time limitations as samples. The appropriate FIELD QC box on the sample Chain of Custody form should be checked.

9.8 SAMPLE LABELING AND CHAIN OF CUSTODY PROCEDURES

At a minimum, the following grab samples will be collected:

- Field Blank: See Section 9.7 for discussion.
- Upstream: A point in the receiving water, upstream of the point of sewage discharge, to capture ambient conditions absent of sewage discharge impacts.
- Source: A point in the receiving water where sewage initially enters the receiving water. See Section 9.6 for information on determining velocity of the surface water in order to determine the Source sample location.
- “Downstream” of spill: A point in the receiving water, downstream of the point of sewage discharge, where the spill material is fully mixed with the receiving water. This location will vary with the velocity of the surface water to be sampled (see Section 9.6).
- A point in a drainage conveyance system before the drainage conveyance system flow discharges into a receiving water.

Photos or video of each sample location will be taken, properly labeled with date, time, and view direction and a map of the photo locations completed. Photos and videos shall include relevant landmarks to identify sampling locations and their surroundings.

Due to the evidentiary nature of samples collected during enforcement investigations, possession must be traceable from the time the samples are collected until they are analyzed. To maintain and document sample possession, a Surface Water Sample Chain of Custody Record (see Sewer Spill/Backup Response Workbook) must be completed. A sample is under custody if:

- It is in your possession, or
- It is in your view, after being in your possession, or
- It was in your possession and under your control to prevent tampering, or
- It is in a designated secure area.

As few people as possible should handle samples. The person taking the samples is personally responsible for the care and custody of the samples collected until they are transferred or dispatched properly.

Samples are accompanied by a chain of custody record. When transferring the possession of samples, the individuals relinquishing and receiving will sign, date, and note the time on the record. This record documents sample custody transfer from the sampler, often through another person, to the analyst at the laboratory. The samples are typically transferred to the sample-receiving custodian at the laboratory.

9.9 SAMPLING EQUIPMENT

The following are examples of sampling equipment used by the City:

- Sampling pole with fixed container
- Sampling pole with removable container
- Sampling pail and rope
- Stream velocity meter
- Grab-n-Go Sample Kit

9.10 GRAB-N-GO SAMPLING KIT

The City maintains a Grab-n-Go sampling kit located at Corp Yard. The kit is inspected quarterly by the Water Treatment Operator. Additionally, any City employee utilizing the kit is responsible for decontaminating sampling equipment and field monitoring devices and replenishing the kit.

Spill Sample Collection Kit Inventory:

- Cooler
- Surface Water Sampling SOP (in Sewer Spill/Backup Response Workbook)
- Ice Pack
- 5 Ammonia sample bottles
- 15 Bacti sample bottles
- Minimum of 20 blank sample bottle labels

- Digital camera or smart phone camera
- Latex gloves
- Safety glasses/goggles
- Waterproof Pen
- Surface Water Sampling Worksheet (in Sewer Spill/Backup Response Workbook)
- Chain of Custody form (in Sewer Spill/Backup Response Workbook)

9.11 DECONTAMINATION PROCEDURES

Removing or neutralizing contaminants from sampling equipment minimizes the likelihood of sample cross contamination, reduces or eliminates transfer of contaminants to clean areas, and prevents the mixing of incompatible substances.

Gross contamination can be removed by physical decontamination procedures. These abrasive and non-abrasive methods include the use of brushes, air and wet blasting, and high- and low- pressure water cleaning.

The decontamination procedures for the sample types and sampling equipment (other than sample bottles, which are provided to Maintenance Workers in a “ready to be used” condition by the lab) used at the City may be summarized as follows:

1. Physical removal
2. Tap water rinse
3. Air dry

9.12 SAMPLING PROCEDURES

9.12.1 Sample Location and Identification Procedures

Samples will be collected by the Maintenance Workers. It is impossible to establish hard and fast rules concerning sampling locations. However, the following general guidelines should be applied whenever surface waters are sampled:

- The sampling location should be far enough upstream or downstream of confluences or point sources so that the surface water and spill volume is well mixed. Natural turbulence can be used to provide a good mixture.
- Samples should be collected at a location where the velocity is sufficient to prevent deposition of solids, and to the extent practical, should be in straight reach having uniform flow. All flow in the reach should be represented, so divided flow areas should be avoided, and samples should be taken towards the middle of the reach where feasible.
- Sampler must always stand downstream of the collection vessel, and sample “into the current.” Care must be taken to avoid introducing re-suspended sediment into the sample.

9.12.2 Surface Water Sampling Standard Operating Procedure (SOP)

The Surface Water Sampling SOP, Section G in the Sewer Spill/Backup Response Workbook, provides step-by-step procedures to collect samples and deliver them for analysis in accordance with State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), Element 6.

9.12.3 Follow Up Sampling

Sampling will be repeated every 24 hours, or as directed by the RWQCB or the Sonoma County Environmental Health, until such time as one of the following criteria have been met:

- The Sonoma County Environmental Health or the RWQCB indicates follow up sampling is no longer required, or
- Both the ammonia and bacteria levels downstream are approximately equal to or less than the upstream levels.

9.13 SAFETY AND ACCESS EXCEPTIONS

If the City encounters access restrictions or unsafe conditions that prevents its compliance with spill response requirements or monitoring requirements in State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), the City shall provide documentation of access restrictions and/or safety hazards in the corresponding required report.

Personal safety of staff engaged in any fieldwork activity (e.g. in transit, walking or hiking, and any field activities while at the sample site) is of primary importance. Staff should never place themselves in dangerous or risky situations. Any hazards that are known by field personnel should be communicated to other members of the field crew.

Fieldwork should be postponed if there is indication that engagement in the field activity could cause bodily harm. Working during lightning storms, in heavy vegetation or poison oak, near aggressive wildlife or domestic animals, traversing steep or rugged terrain, unstable slopes or creek banks, near swiftly moving water or potential flash flood conditions, or during snowy weather is not considered "normal risk." If any member of the field crew is uncomfortable with a reasonable self-determined hazardous field condition, it is that person's responsibility to bring this to the attention of the onsite field supervisor or their supervisor. A "reasonable self-determined hazardous field condition" is defined as other than normal risk. Supervisors shall not dismiss any person's spoken concerns that field conditions are too hazardous to complete the work assignment.

The person taking the samples must have adequate protection, including protective clothing. They must wear gloves, as protection against chemical and/or bacteriological hazards, while they are sampling or handling samples that are known or suspected to be hazardous (e.g. visible solids or sheens, downstream from sewage spills, etc.), or if hands have open wounds. The type of gloves worn shall be determined by the sampling circumstance and type of pollutants expected – for instance longer gloves are needed when samples must be taken well below the surface.

When in a boat or wading in a stream and where the danger of drowning exists, a personal floatation device shall be worn at all times in addition to following the other requirements of Title 8 CCR 1602 Working Over or Near Water. Other protective measures shall be taken in accordance with City safety procedures.

Upon arrival at a sampling site, safety equipment such as signs, cones, lights, etc. shall be set out as appropriate. Vehicles shall be parked in locations and directions to minimize traffic disruption and avoid sample contamination. Photos should be ultimately taken of the placement of all safety equipment and signage.

The following guidelines apply to all fieldwork by City staff.

- No sample or measurement is worth the risk of injury.

- All staff shall use proper personnel protective gear as appropriate for the incident (e.g., life preservers, gloves, goggles, etc.)
- Field sampling crews should consist of at least two members unless otherwise approved by a supervisor.
- Be conscious of the whereabouts of rattlesnakes, mountain lions, and other dangerous animals.
- Open body wounds are entry sites for infection; take the necessary precautions for self-protection.
- If there is storm activity in the work area, wait for safer conditions to develop or postpone the sampling.
- Do not sample at night without approval from your supervisor.
- Do not trespass on private property or posted restricted public lands without prior permission and written approval from property owner or administrator.
- If strange or suspicious looking people are in the work area, either wait for them to leave or postpone the work to a later time. Do not force confrontations with strangers and back away from any confrontations with the public. Be courteous and understanding of public concerns of the situation.
- Take the necessary precautions against exposure to harmful weather conditions such as heat, wind, snow, cold, rain, etc.
- Carefully evaluate a given on-site situation to determine if the task can be performed safely.
- Streams will not be entered unless the responding employees have the necessary protective footwear (e.g. rubber boots, waders) and the footwear does not pose an additional risk to worker safety (e.g. waders filling with water if the employee slips in the stream).
- Streams will not be entered if deemed unsafe to do so by the most senior employee on the responding crew and if entered, will only be done so in accordance with Title 8 CCR Section 1602 Work Over or Near Water.

9.14 SPILL TECHNICAL REPORT: Spill Technical Report for Individual Category 1 Spill in which 50,000 Gallons or Greater Discharged into a Surface Water

For any spill in which 50,000 gallons or greater discharged into a surface water, **within 45 calendar days** of the spill end date, the Public Works Superintendent and/or Assistant Public Works Superintendent shall submit a Spill Technical Report to the online CIWQS Sanitary Sewer System Database. The Spill Technical Report, at minimum, must include the following information:

1. Spill causes and circumstances, including at minimum:
 - Complete and detailed explanation of how and when the spill was discovered;
 - Photographs illustrating the spill origin, the extent and reach of the spill, drainage conveyance system entrance and exit, receiving water, and post-cleanup site conditions;
 - Diagram showing the spill failure point, appearance point(s), the spill flow path, and ultimate destinations;
 - Detailed description of the methodology employed, and available data used to calculate the discharge volume and, if applicable, the recovered spill volume;
 - Detailed description of the spill cause(s);
 - Description of the pipe material, and estimated age of the pipe material, at the failure location;
 - Description of the impact of the spill;

- Copy of original field crew records used to document the spill; and
 - Historical maintenance records for the failure location.
2. City's response to the spill:
- Chronological narrative description of all actions taken by the City to terminate the spill;
 - Explanation of how the Sewer System Management Plan Spill Emergency Response Plan was implemented to respond to and mitigate the spill; and
 - Final corrective action(s) completed and a schedule for planned corrective actions, including:
 - Local regulatory enforcement action taken against an illicit discharge in response to this spill, as applicable,
 - Identifiable system modifications, and operation and maintenance program modifications needed to prevent repeated spill occurrences, and
 - Necessary modifications to the Emergency Spill Response Plan to incorporate lessons learned in responding to and mitigating the spill.
3. Water Quality Monitoring, including at minimum:
- Description of all water quality sampling activities conducted;
 - List of pollutant and parameters monitored, sampled and analyzed; as required in Section 9.2.
 - Laboratory results, including laboratory reports;
 - Detailed location map illustrating all water quality sampling points; and
 - Other regulatory agencies receiving sample results (if applicable).
5. Evaluation of spill impact(s), including a description of short-term and long-term impact(s) to beneficial uses of the surface water.

9.15 TRAINING

Training will be provided in accordance with the table below:

Surface Water Sampling Training Program	
Who Is Trained to Collect Surface Water Samples?	Maintenance Workers
Training Curriculum	At a minimum, training shall include: • The City of Sebastopol Water Quality Monitoring Plan • Sampling technique, including hands on practice • Sampling equipment calibration, use and decontamination procedures, including hands on practice • Sampling safety • Completion of the Sampling Equipment Calibration/Maintenance Log, Surface Water Sampling Report and Chain of Custody
Training Documentation	Attendees shall be required to sign-in to all training on the appropriate forms used by the City.
Refresher Training Frequency	Annual

Who is Responsible for Ensuring Training Occurs?	Public Works Superintendent
Required Training Records	Employee training sign in log
Who is Responsible for Maintaining Records?	Public Works Superintendent

10. NOTIFICATION, REPORTING, MONITORING AND RECORDKEEPING REQUIREMENTS

ref. ORDER WQ 2022-0103-DWQ Attachment E-1 and E-2

10.1 REPORTING REQUIREMENTS

All reporting required in State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR) must be submitted electronically to the online CIWQS Sanitary Sewer System Database (<https://ciwqs.waterboards.ca.gov>), unless specified otherwise in State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR). Electronic reporting may solely be conducted by a Legally Responsible Official or Data Submitter(s) previously designated by the Legally Responsible Official, as required in section 5.8 (Designation of Data Submitters) of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

The City shall report any information that is protected by the Homeland Security Act, by email to SanitarySewer@waterboards.ca.gov, with a brief explanation of the protection provided by the Homeland Security Act for the subject report to be protected from unauthorized disclosure and/or public access, and for official Water Board regulatory purposes only.

Refer to APPENDIX A for detailed reporting requirements by spill category.

10.2 REGULATOR REQUIRED NOTIFICATIONS

10.2.1 Spill Category 1: Spills to Surface Waters

Spill Requirement	Due	Method
Notification	Within two (2) hours of the City's knowledge of a Category 1 spill of 1,000 gallons or greater, discharging or threatening to discharge to surface waters notify the California Office of Emergency Services and obtain a notification control number.	California Office of Emergency Services at: (800) 852-7550 (Section 1 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))
Monitoring	- Conduct spill-specific monitoring; - Conduct water quality sampling of the receiving water within 18 hours of initial knowledge of spill of 50,000 gallons or greater to surface waters.	(Section 2 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))

Reporting	• Submit Draft Spill Report within three (3) business days of the City's knowledge of the spill; • Submit Certified Spill Report within 15 calendar days of the spill end date; • Submit Technical Report within 45 calendar days after the spill end date for a Category 1 spill in which 50,000 gallons or greater discharged to surface waters; and • Submit Amended Spill Report within 90 calendar days after the spill end date.	(Section 3.1 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))
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10.2.2 Spill Category 2: Spills of 1,000 Gallons or Greater That Do Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	Within two (2) hours of the City's knowledge of a Category 2 spill of 1,000 gallons or greater threatening to discharge to waters of the State: Notify California Office of Emergency Services and obtain a notification control number.	California Office of Emergency Services at: (800) 852-7550 (Section 1 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))
Monitoring	Conduct spill-specific monitoring.	(Section 2 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))
Reporting	• Submit Draft Spill Report within three (3) business days of the City's knowledge of the spill; • Submit Certified Spill Report within 15 calendar days of the spill end date; and • Submit Amended Spill Report within 90 calendar days after the spill end date.	(Section 3.2 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))

10.2.3 Spill Category 3: Spills of Equal or Greater than 50 Gallons and Less than 1,000 Gallons That Does Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	Not Applicable	Not Applicable
Monitoring	Conduct spill-specific monitoring.	(Section 2 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))
Reporting	• Submit monthly Certified Spill Report to the online CIWQS Sanitary Sewer	(Section 3.3 and 3.5 of Attachment E1 of the State Water Board Order No. WQ

	System Database within 30 calendar days after the end of the month in which the spills occur; and • Submit Amended Spill Reports within 90 calendar days after the Certified Spill Report due date.	2022-0103-DWQ (SSSWDR))
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10.2.4 Spill Category 4: Spills Less Than 50 Gallons That Do Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	Not Applicable	Not Applicable
Monitoring	Conduct spill-specific monitoring.	(Section 2 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))
Reporting	• If, during any calendar month, Category 4 spills occur, certify monthly, the estimated total spill volume exiting the sanitary sewer system, and the total number of all Category 4 spills into the online CIWQS Sanitary Sewer System Database, within 30 days after the end of the calendar month in which the spills occurred. • Upload and certify a report, in an acceptable digital format, of all Category 4 spills to the online CIWQS Sanitary Sewer System Database, by February 1st after the end of the calendar year in which the spills occur.	(Section 3.4, 3.6, 3.7 and 4.4 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))

10.2.5 City Owned and/or Operated Lateral Spills That Do Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	Within two (2) hours of the City's knowledge of a spill of 1,000 gallons or greater, from an City- owned and/or operated lateral, discharging or threatening to discharge to waters of the State: Notify California Office of Emergency Services and obtain a notification control number. Not applicable to a spill of less than 1,000 gallons.	California Office of Emergency Services at: (800) 852-7550 (Section 1 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))

Monitoring	Conduct visual monitoring.	(Section 2 of Attachment E1 of the State Water Board ORDER WQ 2022-0103-DWQ)
Reporting	- Upload and certify a report, in an acceptable digital format, of all lateral spills (that do not discharge to a surface water) to the online CIWQS Sanitary Sewer System Database, by February 1st after the end of the calendar year in which the spills occur. - Report a lateral spill of any volume that discharges to a surface water as a Category 1 spill.	(Sections 3.6, 3.7 and 4.4 of Attachment E1 of the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR))

10.3 COMPLAINT RECORDS

The City maintains records of all complaints received whether or not they result in sanitary sewer overflows. These complaint records include, but are not limited to, records documenting how the City responded to notifications of spills. Each complaint record must, at a minimum, include the following information:

- Date, time, and method of notification,
- Date and time the complainant first noticed the spill, if available,
- Narrative description of the complaint, including any information the caller provided regarding whether the spill has reached surface waters or a drainage conveyance system, if available,
- Complainant's contact information, if available, and
- Final resolution of the complaint;

All complaint records will be maintained for a minimum of five years whether or not they result in a spill. Spill files (field notes, spill/Backup Response Workbook) are kept in the Public Works S-Drive Customer Service Request Folder.

11. POST-SPILL ASSESSMENTS OF SPILL RESPONSE ACTIVITIES

(ref. State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), *Element 6, ATTACHMENT D, Page D-6*)

Every spill event is an opportunity to evaluate the City adherence to response and reporting procedures and effectiveness of the response. Each spill event is unique, with its own elements and challenges including volume, cause, location, terrain, climate, and other parameters.

As soon as possible after spill events all the participants, from the person who received the call to the last person to leave the site, will meet to review the procedures used and to discuss what worked and where improvements could be made in responding to and mitigating future spill events. The results of the debriefing will be documented and tracked to ensure the action items are completed as scheduled.

11.1 FAILURE ANALYSIS INVESTIGATION

The objective of the failure analysis investigation is to determine the “root cause” of the spill and to identify corrective action(s) needed that will reduce or eliminate future potential for the spill to recur or for other spills to occur.

The investigation will include reviewing all relevant data to determine appropriate corrective action(s) for the line segment. The investigation may include:

- Reviewing and completing the Sanitary Sewer Spill Report and any other documents related to the incident
- Reviewing the incident timeline and other documentation regarding the incident
- Reviewing communications with the reporting party and witness
- Reviewing volume estimate, volume recovered estimate, volume estimation assumptions and associated drawings
- Reviewing available photographs
- Interviewing staff that responded to the spill
- Reviewing past maintenance records
- Reviewing past CCTV records,
- Conducting a CCTV inspection to determine the condition of all line segments immediately following the spill and reviewing the video and logs,
- Reviewing any Fats, Oils, Roots and Grease (FROG) related information or results
- Post spill debrief records
- Interviews with the public at the spill location

The product of the failure analysis investigation will be the determination of the root cause and the identification and scheduling of the corrective actions. The Collection System Failure Analysis Form (in Sanitary Sewer Spill/Backup Response Workbook) will be used to document the investigation.

12. SPILL RESPONSE TRAINING

(ref. State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), Element 6, Attachment D 4.3 page D-5 and Element 6 page D-6)

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

12.1 INITIAL AND ANNUAL REFRESHER TRAINING

All City personnel who may have a role in responding to, reporting, and/or mitigating a sewer system spill will receive training on the contents of this SERP. All new employees will receive training before they are placed in a position where they may have to respond. Current employees will receive annual refresher training on this SERP and the procedures to be followed. The City will document all training.

Affected employees will receive annual training on the following topics by knowledgeable trainers:

- The requirements of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), Element 6
- The City's Spill Emergency Response Plan procedures and practice drills
- Containment and cleanup methods
- Researching and documenting Sanitary Sewer Spill Start Times
- Skilled estimation of spill volume for field operators
- Impacted Surface Waters: Sample location selection, sampling, and documentation procedures
- Electronic CIWQS reporting procedures for staff submitting data
- State Water Resources Control Board Employee Knowledge Expectations

Through SWRCB Employee Knowledge Expectations training, the employee will be able to answer the following:

1. Please briefly describe your name and job title.
2. Please describe for us approximately when you started in this field and how long you have worked for your agency.
3. Please expand on your current position duties and role in responding in the field to any spill complaints.
4. Please describe your SOPs used to respond/mitigate spills when they occur.
5. Describe any training your agency provides or sends you to for conducting spill volume estimates.
6. We are interested in learning more about how your historical spill response activities have worked in the field. We understand from discussions with management earlier that you use the SERP from the SSMP. Please elaborate on how you implement and utilize the procedures in the plan.
7. Historically, before any recent changes, can you please walk us through how you would typically receive and respond to any spill complaints in the field?
8. Can you tell us who is responsible for estimating spill volumes discharged? If it is you, please describe how you go about estimating the spill volume that you record on the work order/service request forms?
9. What other information do you collect or record other than what is written on the work order form?
10. Describe if and when you ever talk with people that call in spills (either onsite or via telephone) to further check out when the spill might have occurred based on what they or others know? If you do this, can you tell us where this information is recorded?
11. We understand you may be instructed to take pictures of some sewer spills/backups into structures. Other than these spills, when else would you typically take any pictures of a spill?
12. Please walk us through anything else you'd like to add to help us better understand how your field crews respond and mitigate spill complaints.

12.2 SPILL RESPONSE DRILLS

Periodic training drills or field exercises will be held to ensure that employees are up to date on these procedures, equipment is in working order, and the required materials are readily available. The training drills will cover scenarios typically observed during sewer related emergencies (e.g. mainline blockage, mainline failure, and lateral blockage). The results and the observations during the drills will be recorded and action items will be tracked to ensure completion.

12.3 SPILL TRAINING RECORD KEEPING

Records will be kept of all training that is provided in support of this SERP for 5 years. The records for all scheduled training courses and for each overflow emergency response training event will include date, time, place, content, name of trainer(s), names and titles of attendees, brief narrative description of the training, including training method(s) and training materials and/or equipment used.

12.4 CONTRACTORS WORKING ON CITY SEWER FACILITIES

All contractors working on City sewer facilities will be required to follow the spill response instructions on the Sanitary Sewer Spill Response Instructions for Contractors (Appendix C). Additional training may be required depending on the nature of the work on any or all of the following:

- The requirements of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR), Element 6
- Communication procedures to City in the event a spill is caused or witnessed
- The City's Spill Emergency Response Plan procedures and practice drills
- Skilled estimation of spill volume for field operators
- Electronic CIWQS reporting procedures for staff submitting data

13. SEWER BACKUP INTO/ONTO PRIVATE PROPERTY CLAIMS HANDLING POLICY

It is the policy of the City that a claims form shall be offered to anyone wishing to file a claim. The following procedures will be observed for all sewer overflows/backups into/onto private property:

- City staff will offer a City claim form irrespective of fault whenever it is possible that the sanitary sewer backup may have resulted from an apparent blockage in the City-owned sewer lines or whenever a City customer requests a claim form. The claim may later be rejected if subsequent investigations into the cause of the loss indicate the City was not at fault.
- It is the responsibility of the Maintenance Workers to gather information regarding the incident and notify the Public Works Superintendent and/or Assistant Public Works Superintendent or their designee.
- It is the responsibility of the City Clerk or their designee to review all claims and to oversee the adjustment and administration of the claim to closure.

14. AUTHORITY

This SERP is written in accordance with the State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

15. APPENDICES

- A. Reporting Requirements by Spill Category
- B. Cal-OES Notification Log
- C. Door Hanger
- D. Sanitary Sewer Spill Response Instructions for Contractors
- E. Sanitary Sewer Spill/Backup Response Workbook
- F. SmartCovers

APPENDIX A:
Reporting Requirements by Spill Category

REPORTING REQUIREMENTS FOR INDIVIDUAL CATEGORY 1 SPILL REPORTING

Draft Spill Report

Within three (3) business days of the City's knowledge of a Category 1 spill, the City shall submit a Draft Spill Report to the online CIWQS Sanitary Sewer System Database.

The Draft Spill Report must, at minimum, include the following items:

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

Certified Spill Report

Within 15 calendar days of the spill end date, the City shall submit a Certified Spill Report for Category 1 spills, to the online CIWQS Sanitary Sewer System Database.

Upon completion of the Certified Spill Report, the online CIWQS Sanitary Sewer System Database will issue a final spill event identification number.

(Category 1 continued)

The Certified Spill Report must, at minimum, include the following mandatory information in addition to all information in the Draft Spill Report:

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

(Category 1 continued)

Amended Certified Spill Reports

The City shall update or add additional information to a Certified Spill Report within **90 calendar days** of the spill end date by amending the report or by adding an attachment to the Spill Report in the online CIWQS Sanitary Sewer System Database. The City shall certify the amended report.

After **90 calendar days**, the City shall contact the State Water Board at SanitarySewer@waterboards.ca.gov to request to amend a Spill Report. The Legally Responsible Official shall submit justification for why the additional information was not reported within the Amended Spill Report due date.

REPORTING REQUIREMENTS FOR INDIVIDUAL CATEGORY 2 SPILL REPORTING

Draft Spill Report

Within three (3) business days of the City's knowledge of a Category 2 spill, the City shall submit a Draft Spill Report to the online CIWQS Sanitary Sewer System Database.

The Draft Spill Report must, at minimum, include the following items:

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

Certified Spill Report

Within 15 calendar days of the spill end date, the City shall submit a Certified Spill Report for the Category 2 spill, to the online CIWQS Sanitary Sewer System Database (<https://ciwqs.waterboards.ca.gov>). Upon completion of the Certified Spill Report, the online CIWQS Sanitary Sewer System Database will issue a final spill event identification number.

The Certified Spill Report must, at minimum, include the following mandatory information in addition to all information in the Draft Spill Report:

1. Description of the spill event destination(s), including GPS coordinates if available, that represent the full spread and reach of the spill;

(Category 2 continued)

2. Spill end date and time;
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), and
 - The methodology(ies), assumptions and type of data relied upon for estimations of the spill start time and the spill end time;
4. Spill cause(s) (for example, root intrusion, grease deposition, etc.);
5. System failure location (for example, main, pump station, etc.);
6. Description of the pipe/infrastructure material, and estimated age of the pipe material, at the failure location;
7. Description of the impact of the spill;
8. Whether or not the spill was associated with a storm event;
9. Description of spill response activities including description of immediate spill containment and cleanup efforts;
10. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the spill, and a schedule of major milestones for those steps;
11. Spill response completion date;
12. Detailed narrative of investigation and investigation findings of cause of spill;
13. Reasons for an ongoing investigation (as applicable) and the expected date of completion; and
14. Whether or not the spill was located within 1,000 feet of a municipal surface water intake.

Amended Certified Spill Reports

The City shall update or add additional information to a Certified Spill Report within **90 calendar days** of the spill end date by amending the report or by adding an attachment to the Spill Report in the online CIWQS Sanitary Sewer System Database. The City shall certify the amended report.

After **90 calendar days**, the City shall contact the State Water Board at SanitarySewer@waterboards.ca.gov to request to amend a Spill Report. The Legally Responsible Official shall submit justification for why the additional information was not reported within the Amended Spill Report due date.

REPORTING REQUIREMENTS FOR INDIVIDUAL CATEGORY 3 SPILL REPORTING

Monthly Certified Spill Reporting

The City shall report and certify all Category 3 spills to the online CIWQS Sanitary Sewer System Database within 30 calendar days after the end of the month in which the spills occurred. (For example, all Category 3 spills occurring in the month of February shall be reported and certified by March 30th). After the Legally Responsible Official certifies the spills, the online CIWQS Sanitary Sewer System Database will issue a spill event identification number for each spill.

The monthly reporting of all Category 3 spills must include the following items for each spill:

1. Contact information: Name and telephone number of City contact person to respond to spill-specific questions;
2. Spill location name;
3. Date and time the City was notified of, or self-discovered, the spill;
4. Operator arrival time;
5. Estimated spill start date and time;
6. Description, photographs, and GPS coordinates where the spill originated. 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;
7. Estimated total spill volume exiting the system;
8. Description and photographs of the extent of the spill and spill boundaries;
9. Did the spill reach a drainage conveyance system? If Yes:
 - a. Description of the drainage conveyance system transporting the spill;
 - b. Photographs of the drainage conveyance system entry location(s);
 - c. Estimated spill volume fully recovered from the drainage conveyance system; and
 - d. Estimated spill volume discharged to a groundwater infiltration basin or facility, if applicable.
10. Estimated total spill volume recovered;
11. Description of the spill event destination(s), including GPS coordinates, if available, that represent the full spread and reaches of the spill;
12. Spill end date and time;
13. Description of how the spill volume estimations were calculated, including, at minimum:
 - a. The methodology and type of data relied upon, including supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered), and
 - b. The methodology and type of data relied upon to estimate the spill start time, on-going spill rate at time of arrival (if applicable), and the spill end time;
14. Spill cause(s) (for example, root intrusion, grease deposition, etc.);

(Category 3 Continued)

15. System failure location (for example, main, pump station, etc.);
16. Description of the pipe/infrastructure material, and estimated age of the pipe/infrastructure material, at the failure location;
17. Description of the impact of the spill;
18. Whether or not the spill was associated with a storm event;
19. Description of spill response activities including description of immediate spill containment and cleanup efforts;
20. Description of spill corrective actions, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the spill, and a schedule of the major milestones for those steps; including, at minimum:
 - a. Local regulatory enforcement action taken against an illicit discharge in response to this spill, as applicable, and
 - b. Identifiable system modifications, and operation and maintenance program modifications needed to prevent repeated spill occurrences at the same spill event location, including:
 - Adjusted schedule/method of preventive maintenance,
 - Planned rehabilitation or replacement of sanitary sewer asset,
 - Inspected, repaired asset(s), or replaced defective asset(s),
 - Capital improvements,
 - Documentation verifying immediately implemented system modifications and operating/maintenance modifications,
 - Description of spill response activities,
 - Spill response completion date, and
 - Ongoing investigation efforts, and expected completion date of investigation to determine the full cause of spill;
21. Detailed narrative of investigation and investigation findings of cause of spill.

Amended Certified Spill Reports

Within 90 calendar days of the certified Spill Report due date, the City may update or add additional information to a certified Spill Report by amending the report or by adding an attachment to the Spill Report in the online CIWQS Sanitary Sewer System Database. The City shall certify the amended report.

After 90 calendar days, the Legally Responsible Official shall contact the State Water Board at SanitarySewer@waterboards.ca.gov to request to amend a certified Spill Report. The Legally Responsible Official shall submit justification for why the additional information was not reported within the 90-day timeframe for amending the certified Spill Report, as provided above.

REPORTING REQUIREMENTS FOR INDIVIDUAL CATEGORY 4 SPILL REPORTING

Monthly Certified Spill Reporting

The City shall report and certify the estimated total spill volume exiting the sanitary sewer system, and the total number of all Category 4 spills to the online CIWQS Sanitary Sewer System Database, within 30 calendar days after the end of the month in which the spills occurred.

Annual Certified Spill Reporting of Category 4 and/or Lateral Spills

For all Category 4 spills and spills from its owned and/or operated laterals that are caused by a failure or blockage in the lateral and that do not discharge to a surface water, the City shall:

- Maintain records per section 4.4. of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirements) of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR). The City shall provide records upon request by State Water Board or Regional Water Board staff.
- Annually upload and certify a report, in an appropriate digital format, of all recordkeeping of spills to the online CIWQS Sanitary Sewer System Database, by February 1st after the end of the calendar year in which the spills occurred.

A spill from an City-owned and/or operated lateral that discharges to a surface water is a Category 1 spill; the City shall report all Category 1 spills per section 3.1 of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirements) of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR).

Monthly Certification of “No-Spills” Or “Category 4 Spills” and/or “Non-Category 1 Lateral Spills”

If either (1) no spills occur during a calendar month or (2) only Category 4, and/or City-owned and/or operated lateral spills (that do not discharge to a surface water) occur during a calendar month, the City shall certify, within 30 calendar days after the end of each calendar month, either a “No-Spill” certification statement, or a “Category 4 Spills” and/or “Non-Category 1 Lateral Spills” certification statement, in the online CIWQS Sanitary Sewer System Database, certifying that there were either no spills, or Category 4 and/or Non-Category 1 Lateral Spills that will be reported annually (per section 3.6 of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirements) of State Water Board Order No. WQ 2022-0103-DWQ (SSSWDR)) for the designated month.

If a spill starts in one calendar month and ends in a subsequent calendar month, and the City has no further spills of any category, in the subsequent calendar month, the City shall certify “no-spills” for the subsequent calendar month.

If the City has no spills from its systems during a calendar month, but the City voluntarily reported a spill from a private lateral or a private system, the City shall certify “no-spills” for that calendar month.

If the City has spills from its owned and/or operated laterals during a calendar month, the City shall not certify “no spills” for that calendar month.

APPENDIX B:
Cal-OES Notification

Cal-OES Notification Log

(WDR - E1, Sections 1.1, 1.2 and 1.3 Notification Requirements and 4.3 Spill Reports)

Name of Agency Responsible for the Spill: _____

Person Notifying Cal-OES: Name: _____ Phone: _____

Notification Time: _____ ☐ AM ☐ PM Date: ____/____/____

When was Agency Informed of the Spill? Time: _____ ☐ AM ☐ PM Date: ____/____/____

Estimated: Spill Volume: _____ Gals. Spill Rate: _____ GPM Volume Contained: _____ Gals.

Estimated Spill Rate Directly or Indirectly to Waters of the State: _____ GPM ☐ N/A

Name of Water Body Receiving or Potentially Receiving Discharge: _____

Description of Water Body Impact and/or Potential Impact to Beneficial Uses: _____

Spill Incident Description: _____

Spill Location: City: _____ Address/Street Number: _____

Street: _____ Cross Street or Landmark: _____

Contact Person on Scene: Name: _____ Phone: _____

Spill Cause or Suspected Cause: _____ ☐ Unknown

Name of Cal-OES Representative: _____ Control Number: _____

Notification of Spill Report Updates After Initial Notification

Updated: Date: ____/____/____ By: _____

Discharge Volume (Increase or Decrease): _____

Volume Discharged to Surface Water (Increase or Decrease): _____

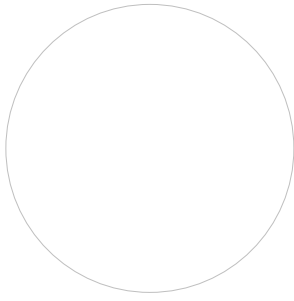
Additional Impacts to surface water and Beneficial Uses: _____

This is Internal Documentation and Does Not Have to be Reported to Cal-OES

Was 2-Hour Notification Delayed Because it would have Substantially Impeded Response Efforts? ☐ Yes ☐ No

Explain Reason(s) for Delay: _____ ☐ N/A

APPENDIX C:
Door Hanger



City of Sebastopol

On (date) _____

at (location) _____

we responded to a reported blockage of the
sanitary sewer service to your property.

We discovered a blockage in:

- ☐ The sanitary sewer main and cleared the line
- ☐ Your sanitary sewer lateral, which is your responsibility to maintain.

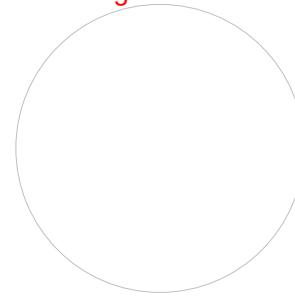
If you require assistance to clear your portion of the lateral you can search the internet for "Sewer Contractors" or "Plumbing Drains & Sewer Cleaning." If you plan to hire a contractor, we recommend getting estimates from more than one company.

City representative notes: _____

City representative name: _____

For questions or comments, please call

City of Sebastopol
Business Hours: (707) 823-5331
After Hours: (707) 829-4400



City of Sebastopol

On (date) _____

at (location) _____

we responded to a reported blockage of the
sanitary sewer service to your property.

We discovered a blockage in:

- ☐ The sanitary sewer main and cleared the line
- ☐ Your sanitary sewer lateral, which is your responsibility to maintain.

If you require assistance to clear your portion of the lateral you can search the internet for "Sewer Contractors" or "Plumbing Drains & Sewer Cleaning." If you plan to hire a contractor, we recommend getting estimates from more than one company.

City representative notes: _____

City representative name: _____

For questions or comments, please call

City of Sebastopol
Business Hours: (707) 823-5331
After Hours: (707) 829-4400

APPENDIX D:

Sewer Spill Response Instructions for Contractors

City of Sebastopol
Spill Emergency Response Plan

Spill Response Requirements for Contracted Services

Contracted services personnel performing work on the [Agency] sewer system who cause or otherwise discover a sewage blockage or spill are required, at a minimum, to respond as detailed below.

- 1. Immediately notify the [Agency] of any sewer problem encountered. Call (xxx) xxx-xxxx.
 - ☐ Spill
 - ☐ Surcharging pipe
 - ☐ Obstruction
- 2. Make attempts to contain the spill or prevent sewage from reaching surface water, drainage system, or sensitive area (densely populated areas, parks, playgrounds, etc.)
 - ☐ Absorbent
 - ☐ Dirt
 - ☐ Sandbags
- 3. Cordon off the area to keep the public safe
 - ☐ Traffic cones
 - ☐ Barricades
 - ☐ Caution Tape
- 4. Provide photo/video documentation
 - ☐ Take Photo(s) of the spill appearance point
 - ☐ Take 10 second video of the active spill (from approximately 10 feet away)
 - ☐ Take photo of the affected area
- 5. Remain onsite until [Agency] staff arrives and provide:
 - ☐ The time problem was discovered
 - ☐ The time the spill was discovered (if different from discovered time)

This was discussed/Reviewed with _____ Date: ____/____/____

Contractor Representative: _____,

Print Name Signature

Contractor Representative: _____,

Print Name Signature

City of Sebastopol Representative: _____,

Print Name Signature

APPENDIX E:
Sewer Spill/Backup Response Workbook

APPENDIX F:

Smartcovers

Appendix F
Water Quality Monitoring Plan

City of Sebastopol Water Quality Monitoring Plan

December 11, 2014

Revised August 25, 2020

Revised July 27, 2026

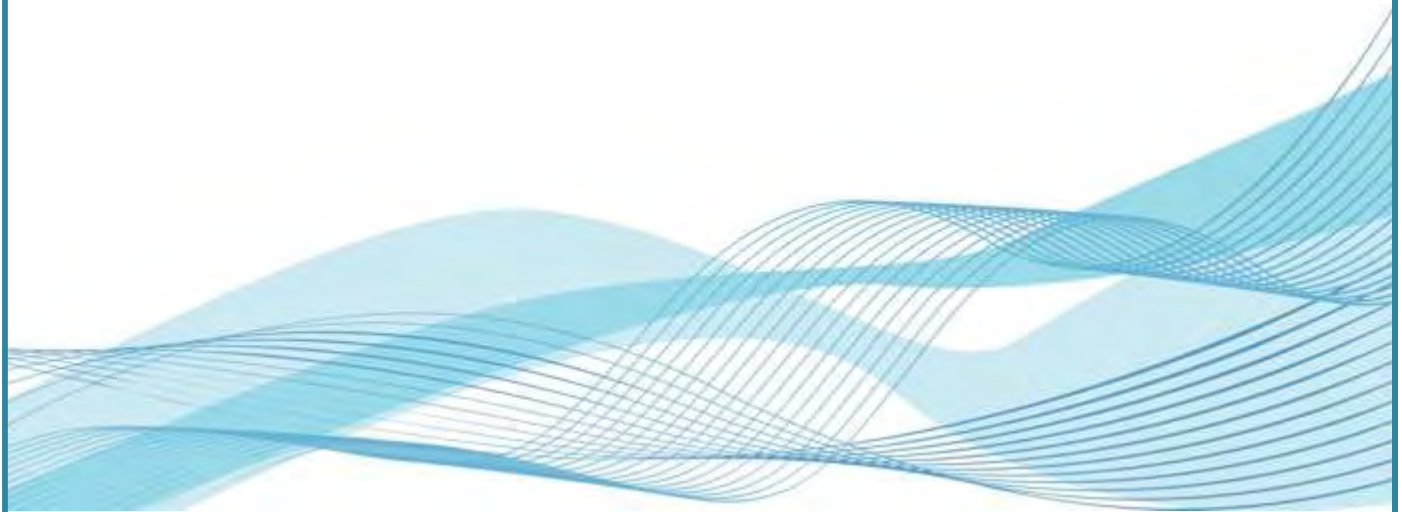


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1. PURPOSE OF PROGRAM PLAN

The purpose of this Water Quality Monitoring Plan (WQMP or Plan) is to establish procedures for water quality monitoring associated with sanitary sewer overflows (SSOs) that may affect waters of the State. This Plan is consistent with the requirements of the State Water Resources Control Board's Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems (Order WQ 2022-0103-DWQ), adopted on December 6, 2022, and effective June 5, 2023, and the applicable Monitoring and Reporting Program (MRP). This WQMP establishes the City of Sebastopol's policies and procedures to ensure consistent compliance with regulatory requirements and provides guidance for City staff and contractors in responding to sanitary sewer overflows that may impact surface waters. This WQMP is consistent with and supplemental to the City's Spill Emergency Response Plan (SERP), Element VI of the City's Sewer System Management Plan (SSMP). Finally, this document will be used to coordinate training for new employees and provide periodic refresher training for existing employees.

Additionally this Plan is also used as a guideline for monitoring and sampling requirements that may be imposed upon the City from citizen suits under the Clean Water Act (CWA) resulting in settlement agreements, stipulated orders or consent decrees that can require monitoring and sampling of sanitary sewer overflows of any kind or size. This Plan establishes procedures for the identification of sampling locations, protocols for the proper collection of samples, the chain of custody for sample collections, the handling of samples, the reporting and recordkeeping to assure the legal integrity of monitoring for compliance with regulatory requirements. The plan will also establish policies and procedures that will be used to assure proper coordination between the taking and testing of samples, as well as assure that samples taken will satisfy the local regulatory agency's Basin Plan and the unique character of the City's local service area and surface waters.

This Program Plan is intended to establish protocols for all sampling including when, where and how: establish the required water quality sample analyses that will be conducted; identify the access and safety requirements related to sampling considerations; and identify any local concerns that this monitoring plan should address. In addition, the Plan establishes the requirements for equipment calibration, notification requirements related to an overflow, recordkeeping requirements, staff training issues and requirements for the regular reviews and audits of the WQMP. Finally, all City forms used for water quality monitoring are included and available for use in any SSO incident.

2. DEFINITIONS

The following definitions and acronyms are used in this Program Plan:

BACTERIA Probaryotic microorganisms typically a few micrometers in length, with shapes from spheres to rods and spirals

CalOES State of California Office of Emergency Services

CALOSHA California Division of Occupational Safety and Health

CFR Code of Federal Regulations

CFS Cubic feet per second

CIWQS California Integrated Water Quality System

CSRMA California Sanitation Risk Management Association

CWA	Clean Water Act
DH2O	Distilled Water
DEET	N,N-Diethyl-meta-toluamide
DOHS	California Department of Health Services
E. Coli	Escherichia coli (bacteria)
ELAP	Environmental Laboratory Accreditation Program
EPA	Environmental Protection Agency
Field QC	Field Quality Control
GPM	Gallons per minute
GWDR	General Waste Discharge Requirements or WDR
GIS	Geographic Information System
LIMS	Laboratory Information Management System
LRO	Legally Responsible Official
mg/l	Milligrams per liter
ml	Milliliter
MPN	Most probable number
MRP	Monitoring and Reporting Program
NH3	Ammonia
NH3-N	Ammoniacal Nitrogen
NPDES	National Pollution Discharge and Elimination System
OERP	Overflow Emergency Response Plan
OES	See CalOES
PPE	Personal Protective Equipment
ppm	Parts per million
QA/QC	Quality Assurance/Quality Control
RWQCB	Regional Water Quality Control Board

Water Quality Monitoring Program Plan

SOP	Standard Operating procedure
SSC	Sewer Service Charge
SSMP	Sanitary Sewer Management Plan
SSO	Sanitary Sewer Overflow
SSO GWDR	Sanitary Sewer Overflow General Waste Discharge Requirements

SURFACE WATER

All waters whose surface is naturally exposed to the atmosphere; for example, rivers, lakes, reservoirs, ponds, streams, seas, estuaries, etc., and all springs, wells, or other collectors directly influenced by surface water.

SWRCB	State Water Resources Control Board
WQMP	Water Quality Monitoring Program Plan
WQ	Water Quality
WDR	Waste Discharge Requirements
VOC	Volatile Organic Compound

3. RESPONSIBILITY

The City shall designate responsibility for all WQMP roles to appropriate classifications within the City to ensure conformance with all activities related to water quality monitoring associated with sanitary sewer overflows (SSOs) that may affect waters of the State, protect public health and the environment, and ensure that personnel responsible for implementing this Plan are properly trained in their roles, responsibilities, and applicable protocols. It is further recognized that the proper implementation of this Plan will help ensure that all monitoring activities withstand regulatory or legal scrutiny by the State Water Resources Control Board, the Regional Water Quality Control Board, or other legal proceedings. These roles and responsibilities are intended to comply with the requirements of the State Water Resources Control Board Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems (Order WQ 2022-0103-DWQ) and the associated Monitoring and Reporting Program (MRP).

The following table contains the roles and responsibilities as assigned by the City to individual classifications or service contractors of the City:

<u>Roles and Responsibility</u>	<u>Responsible Classification</u>
Provide and document regular training on WQMP for all City classifications that have a role or responsibility in the WQMP and identified herein	Sebastopol Public Works Department -Safety Representative
Identification and assessment of potential impacts to local areas with surface waters that may require WQMP (i.e. aerial crossings, creeks, waterways, rivers, bays, estuaries, etc.)	Sebastopol Public Works and Engineering Departments

Water Quality Monitoring Program Plan

Determination of specific sampling protocols and analytic methods to be used for the City-required testing	Sebastopol Public Works Department -Public Works Operation Supervisor
Determination of appropriate bacterial indicators for sampling	Sebastopol Public Works Department - Public Works Operation Supervisor
Annual review of all standard operating procedures related to this WQMP especially the Sample Collection procedures	Sebastopol Public Works Department - Public Works Operation Supervisor
Decision to invoke a WQMP and direct the monitoring program to conclusion	City of Sebastopol -City Manager
Selection of sampling locations	Sebastopol Public Works Department - Public Works Operation Supervisor
Coordination of field sampling	Sebastopol Public Works Department - Public Works Operation Supervisor
Conduct field sampling per City protocols	Sebastopol Public Works Department -Public Works Maintenance Staff
Authorization and direction for placement of public notifications and signage	Sebastopol Public Works Department -Public Works Director
Photographs of sampling and signage placed to protect public health and safety	Sebastopol Public Works Department -Public Works Maintenance Staff
Preparation of Chain of Custody for all samples taken including proper labeling	Sebastopol Public Works Department -Public Works Maintenance Staff
Determination of spill travel time, if applicable.	Sebastopol Public Works Department -Public Works Maintenance Staff
Review and evaluate lab results for termination of sampling and to determine the nature and impact of the release	Sebastopol Public Works Department - Public Works Operation Supervisor
Decision to terminate sampling	Sebastopol Public Works Department -Public Works Director
Preparation of detailed sampling location map	Sebastopol Public Works Department -Public Works Assistant Superintendent
Conduct sample analysis	<i>Laguna Environmental Laboratory, ELAP Cert #1126 4300 Llano Rd, Santa Rosa, CA 95407 707 543-3365</i>
Preparation of water quality sampling activities narrative for Technical Report	Sebastopol Public Works Department - Public Works Operation Supervisor
Review and Approval of Technical Report	Sebastopol Public Works Department -Public Works Director
Certification and placement of Technical report in the CIWQS spill reporting system.	Sebastopol Public Works Department - Public Works Operation Supervisor
Failure Analysis Investigation of all water quality monitoring from the SSO event to determine all necessary changes or modifications to the WQMP	Sebastopol Public Works Department - Public Works Director
Audits of the WQMP as required by City SSMP Element 10, Audit.	Sebastopol Public Works Department -Public Works Director
Management of Change responsibilities for the WQMP and all associated forms and documents required for use during an incident	Sebastopol Public Works Department -Public Works Director

It is recommended that this list of responsibilities be placed on a laminated card and kept in the Sampling Kit for easy access during an SSO sampling incident.

4. AUTHORITY AND REFERENCES

The authority for the monitoring and sampling of sanitary sewer overflows are contained in the following regulations:

1. State Water Resources Control Board, Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, Order WQ 2022-0103-DWQ, adopted December 6, 2022, effective June 5, 2023.
 2. State Water Resources Control Board, Monitoring and Reporting Program (MRP) for the Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, Order WQ 2022-0103-DWQ.
 3. Standard Methods for the Examination of Water and Wastewater, latest edition, American Public Health Association (APHA), American Water Works Association (AWWA), and Water Environment Federation (WEF).
 4. Federal Water Pollution Control Act (Clean Water Act), as amended, including Sections 301(a), 304(h), and 501(a).
 5. Code of Federal Regulations, Title 40, Part 136, Guidelines Establishing Test Procedures for the Analysis of Pollutants, as amended.
- A. There are a number of applicable references that are available to assist with the a proper Water Quality Monitoring Program as follows:
 - B. Water Quality Control Plan for the North Coast Region (Basin Plan), California Regional Water Quality Control Board, North Coast Region, as amended.
 - C. California State Water Resources Control Board, Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems (Order WQ 2022-0103-DWQ) and associated Monitoring and Reporting Program (MRP).
 - D. City of Sebastopol Spill Emergency Response Plan (SERP), Element VI of the Sewer System Management Plan (SSMP).
 - E. Standard Methods for the Examination of Water and Wastewater, latest edition, American Public Health Association (APHA), American Water Works Association (AWWA), and Water Environment Federation (WEF).
 - F. U.S. Environmental Protection Agency (EPA), National Recommended Water Quality Criteria, as amended.
 - G. U.S. Environmental Protection Agency (EPA), Surface Water Sampling Guidance, Standard Operating Procedures, and applicable quality assurance/quality control (QA/QC) guidance, as amended.

5. IDENTIFICATION OF LOCAL SURFACE WATERS AND CHARACTERISTICS

An important element of any water quality monitoring program is the proper and thorough understanding of the service area and the various challenges the geography and sanitary sewer infrastructure of the service area present for the potential of wastewater reaching surface waters or storm water facilities. By evaluating the areas of concern in a service area such as lakes, rivers, dry creeks, aerial pipeline crossings over water ways and all storm water related infrastructure, the City can be better prepared to timely respond to any SSO reaching surface waters and to minimize the impacts of an SSO in or around local surface waters and storm water infrastructure.

A. Surface Waters of Concern

For the purposes of this Plan, surface waters are defined as all waters whose surface is naturally exposed to the atmosphere, for example, rivers, lakes, reservoirs, ponds, streams, seas, estuaries, etc., and all springs, wells, or other collectors directly influenced by surface water. In addition, the City will also identify and evaluate areas where collection system pipelines and force mains cross over or under waterways as these crossings can require additional resources and equipment to properly address any SSO from these collection system assets.

Surface waters of concern are those surface waters with the City's service area that may be impacted by a sanitary sewer overflow from the City's sanitary sewer collection system. Prior planning, review and evaluation of potential failure mechanisms can help minimize any potential impacts to surface waters or storm water infrastructure when and if the WQMP must be invoked. Any review of these important areas of potential surface water contamination in advance of an SSO should allow the City to be better prepared to respond to an SSO with the proper equipment and a better understanding of the procedures that may need to be invoked during the SSO such as flow rate of a creek or stream, and potential areas of significant environmental concern such as shell fish beds or fish habitats. In addition, having all storm water infrastructure located on the collection system field maps will help the City's responders quickly determine if SSOs may flow into storm drains reach and impact surface waters.

The following (Table 5.1) are the surface waters of concern within the City's jurisdiction:

Water Quality Monitoring Program Plan

Table 5.1: Surface Waters of Concern

Name	Type (see legend, below)	Map Location	Background Monitoring?	Access Considerations	Safety Considerations
Laguna de' Santa Rosa	Stream	See Maps in Attachment (Att.) F	No	No special considerations	Exercise caution, may be slippery in wet weather
Calder Creek	Brook	See Maps in Att. F	No	"	"
Zimpher Creek	Brook	See Maps in Att. F	No	"	"
Atascadero Creek	Brook	See Maps in Att. F	No	"	"
Witter Creek	Brook	See Maps in Att. F	No	"	"
Morris Outfall	Culvert	See Maps in Att. F	No	"	"

Bog:	Freshwater wetlands that are poorly drained and characterized by a buildup of peat.
Brackish Water:	Generally, water containing dissolved minerals in amounts that exceed normally acceptable standards for municipal, domestic, and irrigation uses. Considerably less saline than sea water. Also, Marine and Estuarine waters with Mixohaline salinity (0.5 to 30 due to ocean salts). Water containing between 1,000-4,000 parts per million (PPM) Total Dissolved Solids TDS). The term brackish water is frequently interchangeable with Saline Water. The term should not be applied to inland waters.
Brook:	A natural stream of water, smaller than a river or creek; especially a small stream or rivulet which breaks directly out of the ground, as from a spring or seep; also, a stream or torrent of similar size, produced by copious rainfall, melting snow and ice, etc.; a primary stream not formed by tributaries, though often fed below its source, as by rills or runlets; one of the smallest branches or ultimate ramifications of a drainage system.
Canal:	A constructed open channel for transporting water.
Channel:	An area that contains continuously or periodically flowing water that is confined by banks and a stream bed.
Culvert:	A buried pipe that allows streams, rivers, or runoff to pass under a road.
Ditch:	A long narrow trench or furrow dug in the ground, as for irrigation, drainage, or a boundary line.
Diversion channel:	(1) An artificial channel constructed around a town or other point of high potential flood damages to divert floodwater from the main channel to minimize flood damages. (2) A channel carrying water from a diversion dam.
Drainage Channel:	For the purposes of complying with the Statewide Sanitary Sewer Order, (1) a man-made canal used to transport storm water as part of a municipal separate storm sewer system, or (2) an intermittent or perennial stream bed.
Dry Wash:	A streambed that carries water only during and immediately following rainstorms.
Ephemeral Streams:	Streams which flow only in direct response to precipitation and whose channel is at all times above the water table.
Freshwater marsh:	Open wetlands that occur along rivers and lakes.
Intermittent stream:	Any nonpermanent flowing drainage feature having a definable channel and evidence of scour or deposition. This includes what are sometimes referred to as ephemeral streams if they meet these two criteria.
Perennial streams:	Streams which flow continuously.
Pipe crossing:	Crossing of a pipe or force main over or under a surface water body.
Riverine:	Relating to, formed by, or resembling a river including tributaries, streams, brooks, etc.
Slough:	A shallow backwater inlet that is commonly exposed at low tide.
Stream:	A general term for a body of flowing water; natural water course containing water at least part of the year. In Hydrology, the term is generally applied to the water flowing in a natural channel as distinct from a canal. More generally, as in the term Stream Gaging, it is applied to the water flowing in any channel, natural or artificial.

For additional definitions refer to the glossary at <http://www.streamnet.org/glossarystream.html>.

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6. LAB SELECTION

A. Analytical Lab

Samples collected for SSO response and background monitoring purposes pursuant to Section 5.0 will be analyzed at the Laguna Environmental Laboratory in Santa Rosa. This lab is accredited through California's Department of Public Health Environmental Laboratory Accreditation Program (ELAP). ELAP provides evaluation and accreditation of environmental testing laboratories to ensure the quality of analytical data used for regulatory purposes to meet the requirements of the State's drinking water, wastewater, shellfish, food, and hazardous waste programs. The State agencies that monitor the environment use the analytical data from these accredited labs. The ELAP-accredited laboratories have demonstrated capability to analyze environmental samples using approved methods.

B. Getting Samples to the Lab

At all times, sample hold times identified below will be observed in accordance with Section 7.0. Once samples are collected, they will be transported to the lab as follows:

1. During Business Hours: Public Works Maintenance staff taking samples will deliver to Lab. 707-543-3350, 8-5 M-F
2. After Hours: Public Works Maintenance staff taking samples will deliver to Lab.

C. Lab Contact Info

Name: Laguna Environmental Lab

Address: 4300 Llano Road, Santa Rosa

Hours Samples Are Accepted: 24 hours

Phone: 707-543-4369, Shirley Johnson (normal hours Supervisor)

Alternate or After Hours Phone: 707-543-3364 (need to call ahead if after hours)

Emergency contact information: 707-543-3364

7. SAMPLING PARAMETERS

A. Required Sampling Parameters

The RWQCB Basin Plan and/or NPDES permit set the water quality standards against which one can judge the levels of impacts of an SSO on surface waters.

In accordance with the State Water Resources Control Board Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems (Order WQ 2022-0103-DWQ) and the associated Monitoring and Reporting Program (MRP), water quality monitoring shall be conducted as required based on the characteristics of the sanitary sewer overflow, receiving water, and applicable regulatory requirements. The following parameters may be sampled, as appropriate:

1. Ammonia

Ammonia-N is a key indicator of the extent of wastewater contamination in the receiving water following a sanitary sewer overflow (SSO). Untreated or partially treated wastewater typically contains elevated concentrations of ammonia-N (generally 20–30 mg/L), while natural background concentrations in surface waters are typically less than 0.5 mg/L. Therefore, elevated ammonia concentrations measured downstream or at the location of the SSO, when compared to upstream background concentrations, provide a reasonable indication of the extent of wastewater contamination.

2. Bacteriological Indicators

Bacteriological indicators, including *E. coli*, enterococci, total coliform, and other parameters specified by the applicable Basin Plan or regulatory agency, are used to evaluate the potential public health impacts of an SSO on receiving waters. If concentrations exceed natural background levels or applicable Basin Plan water quality objectives, additional public health notifications, warning signs, or other response actions may be necessary.

It should be recognized that elevated bacteria concentrations may result from sources unrelated to an SSO, including wildlife, domestic animals, agricultural runoff, urban stormwater runoff, or other non-point source discharges. Upstream and background samples help distinguish SSO-related impacts from existing ambient water quality conditions. In some cases, particularly where sampling occurs after the SSO has ceased or where receiving waters are influenced by stormwater or other sources, it may not be possible to definitively distinguish SSO-related impacts from background conditions.

Generally, if bacteriological concentrations at downstream or impacted locations are comparable to upstream or background conditions, or are consistent with historical ambient monitoring data, the water quality impacts attributable to the SSO are considered minimal.

The applicable surface water quality objectives for bacteriological indicators are provided in Tables 7.1 and 7.2.

Table 7.1: Water Quality Objectives for Coliform Bacteria^a		
Beneficial Use	Indicator	Water Quality Objective
Water Contact Recreation (REC-1) – Fresh Water	<i>E. coli</i>	Six-week rolling geometric mean $\leq$ 100 cfu/100 mL ; Statistical Threshold Value (STV) $\leq$ 320 cfu/100 mL (not to be exceeded by more than 10% of samples collected in a calendar month)
Water Contact Recreation (REC-1) – Marine/Estuarine Water	Enterococci	Six-week rolling geometric mean $\leq$ 30 cfu/100 mL ; Statistical Threshold Value (STV) $\leq$ 110 cfu/100 mL (not to be exceeded by more than 10% of samples collected in a calendar month)
Shellfish Harvesting (SHELL)	Fecal Coliform	$\leq$ 43/100 mL (5-tube decimal dilution) or $\leq$ 49/100 mL (3-tube decimal dilution)
Municipal Supply – Surface Water	Total Coliform	Geometric Mean $<$ 20/100 mL

NOTES:

- Recreational water quality objectives for freshwater are based on a six-week rolling geometric mean and a Statistical Threshold Value (STV) for *E. coli*.
- Recreational water quality objectives for marine and estuarine waters are based on a six-week rolling geometric mean and a Statistical Threshold Value (STV) for enterococci.
- Shellfish harvesting objectives are based on the National Shellfish Sanitation Program.
- Municipal supply objectives are based on the applicable California Regional Water Quality Control Board Basin Plan and the Safe Drinking Water Act.
- Equivalent analytical methods approved under 40 CFR Part 136 or other approved methods may be used for compliance monitoring.

Source: North Coast Region Basin Plan (Region 1)
Water Quality Control Plan (Basin Plan)

California RWQCB, North Coast Region adopted 6/13/2025

Table 7.2 – U.S. EPA Bacteriological Criteria for Water Contact Recreation^{1, 2}
(in colonies per 100 ml)

Steady State (all areas)	Fresh Water		Salt Water
	Enterococci	E. Coli	Enterococci
	33	126	35
Maximum at:			
• Designated beach	61	235	104
• Moderately used area	89	298	124
• Lightly used area	108	406	276
• Infrequently used area	151	576	500

NOTES:

1. The criteria were published in the Federal Register, Vol. 51, No. 45 / Friday, March 7, 1986 / 8012-8016. The criteria are based on:
 - a. Cabelli, V.J. 1983. Health Effects Criteria for Marine Recreational Waters, U.S. EPA, EPA 600/1-80-031, Cincinnati, Ohio, and
 - b. Dufour, A.P. 1984, Health Effects Criteria for Fresh Recreational Waters, U.S. EPA, EPA 600/1-84-004, Cincinnati, Ohio.
2. The U.S. EPA criteria apply to water contact recreation only. The criteria provide for a level of production based on the frequency of usage of a given water contact recreation area. The criteria may be employed in special studies within this region to differentiate between pollution sources or to supplement the current coliform objectives for water contact recreation.

B. Sampling Parameters for City of Sebastopol**1. Ammonia**

- Discussion: See Section 7A
- Sample Container: Plastic/glass
- Sample Type: Grab
- Sample Volume Required: 200 ml. minimum
- Hold Time: 28 days
- Preservative: Sulfuric acid
- Analytical Method: Method 4500-XX R and C, Standard Methods for the Examination of Water or Wastewater, 21st Edition

2. Total Coliform/Fecal

- Discussion: See Section 7A.2
- Sample Container: Plastic (sterile)
- Sample Type: Grab
- Sample Volume Required: 100 ml. minimum
- Hold Time: 8 hours
- Preservative: None if waters are not chlorinated
- Analytical Method: Method 9221 B, C and E, Standard Methods for the Examination of Water or Wastewater, 21st Edition

3. Enterococcus (not currently used by City)

- Discussion: See Section 7A.2
- Sample Container: Plastic (sterile)
- Sample Type: Grab
- Sample Volume Required: 100 ml. minimum
- Hold Time: 48 hours
- Preservative: None if waters are not chlorinated
- Analytical Method: Method 9230D, Standard Methods for the Examination of Water or Wastewater, 21st Edition

4. Biological Oxygen Demand (BOD)

- Discussion: Added 2020 (settlement agreement with Riverwatch)
- Sample Container: Plastic (sterile)
- Sample Type: Grab
- Sample Volume Required: 100 ml. minimum
- Hold Time: 8 hours
- Preservative: None if waters are not chlorinated
- Analytical Method: Method 5210-B 5-day test, Standard Methods for the Examination of Water or Wastewater, 21st Edition

5. Dissolved Oxygen

- Discussion: Added 2020 (settlement agreement with Riverwatch)
- Sample Container: Plastic (sterile)
- Sample Type: Grab
- Sample Volume Required: 100 ml. minimum
- Hold Time: NA
- Preservative: None if waters are not chlorinated
- Analytical Method: Method 4500-O Membrane electrode, Standard Methods for the Examination of Water or Wastewater, 21st Edition

8. SAMPLING EQUIPMENT AND CALIBRATION

A. Sampling Equipment Used At City of Sebastopol

The following are the sampling equipment used by the City

- Sampling pole with fixed container
- Sampling pole with removable container
- Sampling pail and rope
- Grab-n-Go Sample Kit containing:
 - Ice pack
 - Waterproof pen
 - Sample labels
 - Camera
 - Sample bottles
 - Dissolved oxygen meter

B. Calibration and Record Keeping (Informational only, Sebastopol currently has no equipment that requires calibration)

Each piece of equipment is required to have an up-to-date calibration and maintenance logbook. The logbook will be maintained to have consecutively numbered pages and shall contain at least the following:

- Date
- Calibration Results
- Calibration comments
- Initials of the individual calibrating the instrument

Each instrument must be clearly identified (e. g., the make, model, serial and/or ID number) to differentiate among multiple meters.

The appropriate calibration procedure must be followed pursuant to City standard calibration operating procedure and if the instrumentation does not have an electronic program that maintains a running calibration log, then the results must be recorded in the logbook each time a piece of field equipment is used, along with the date and name/initials of the person performing the calibration.

If difficulty is encountered in calibrating an instrument, or if the instrument will not hold calibration, this information must also be recorded. Malfunctioning equipment should not be used to collect data. Steps should be taken to correct the problem as soon as possible. All equipment maintenance should be recorded in the logbook indicating what was done to correct the problem, along with the date and signature/initials of the staff person that corrected the problem.

9. Sampling Procedures

A. Sample Location and Identification Procedures:

Samples will be collected by the City of Sebastopol Maintenance Staff. The most precise and accurate analytical measurements are worthless and even detrimental if performed on a sample that was improperly collected and stored, or was contaminated in the process. The purpose of sampling and analysis is to provide data that can be used to interpret the quality or condition of the water under investigation.

Unfortunately, water quality characteristics are not spatially or temporally uniform from one effluent to another. A sampling program must recognize such variations and provide a basis for compensations for their effects. The sample must be:

1. Representative of the material being examined;
2. Uncontaminated by the sampling technique or container;
3. Of adequate size for all laboratory examinations;
4. Properly and completely identified;
5. Properly preserved, and
6. Delivered and analyzed within established holding times.

These six requirements are absolutely necessary for a proper assessment of water quality.

It is impossible to establish hard and fast rules concerning sampling locations. However, the following general guidelines should be applied whenever City personnel conduct surface water sampling:

1. The sampling location should be far enough upstream or downstream of confluences or point sources so that the surface water and SSO volume is well mixed. Natural turbulence can be used to provide a good mixture.
2. Samples should be collected at a location where the velocity is sufficient to prevent deposition of solids, and to the extent practical, should be in straight reach having uniform flow. All flow in the reach should be represented, so divided flow areas should be avoided and samples should be taken towards the middle of the reach where feasible.
3. Sampler must always stand downstream of the collection vessel, and sample "into the current". Care must be taken to avoid introducing re-suspended sediment into the sample.

B. Sample Types:

Grab samples are appropriate for the characterization of surface waters at a particular time and place, to provide information about minimum and maximum concentrations, to allow for the collection of variable sample volume.

Grab samples may be collected directly into the sample container, or a clean decontaminated intermediate container may be used if a wading sample is not possible or safe. If an intermediate container is used, when in the field, double rinse the sampling device (bucket, automatic sampler) with sample water prior to collecting the sample and be sure to discard rinse water downstream of where sample will be collected. If samples are collected in a bucket and

distributed a consolidation collection container, swirl the contents of the bucket as it is being poured into the consolidation collection container to avoid settling of solids (and pour in back and forth pattern – e.g., 1-2-3-3-2-1).

Grab Sample: A grab sample is defined as an individual sample collected at a given time. Grab samples represent only the condition that exists at the time the sample is collected (US EPA 1977).

Surface Grab Sample: A sample collected at the water surface (i.e. skimming) directly into the sample container or into an intermediate container such as a clean bucket. A single or discrete sample collected at a single location.

Field Blanks are used to evaluate the potential for contamination of a sample by site contaminants from a source not associated with the sample collected (e.g., airborne dust, etc.). Sterile, deionized water is taken into the field in a sealed container. This is the stock water. The stock water is then poured into the sample container. The containers and sample submission forms are labeled as “Field Blank“. The same template selected for the test samples should be used. Field blanks are subject to the same holding time limitations as samples. The appropriate FIELD QC box on the sample Chain of Custody form should be checked.

C. Decontamination Procedures

Removing or neutralizing contaminants from sampling equipment minimizes the likelihood of sample cross contamination, reduces or eliminates transfer of contaminants to clean areas, and prevents the mixing of incompatible substances.

Gross contamination can be removed by physical decontamination procedures. These abrasive and non-abrasive methods include the use of brushes, air and wet blasting, and high and low pressure water cleaning.

The decontamination procedure described above may be summarized as follows:

1. Physical removal
2. Non-phosphate detergent wash
3. Tap water rinse
4. Distilled/deionized water rinse
5. 10% nitric acid rinse
6. Distilled/deionized water rinse
7. Solvent rinse (pesticide grade)
8. Air dry
9. Distilled/deionized water rinse

D. Sample Labeling and Chain of Custody Procedures

A sample is a physical evidence of a facility or the environment. An essential part of all enforcement investigations is that evidence gathered be properly documented. To accomplish this, the following sample identification and chain of custody procedures are established.

1. The method of sample identification depends on the type of measurement or analyses

performed. When in-situ measurements are made, the data are recorded directly in Field Data Worksheets with identifying information, field observations, and remarks. Examples of in-situ measurements are:

- pH
- Temperature
- Dissolved Oxygen
- Stream Flow Measurement

Samples other than in situ measurements must be identified by a sample label. These samples are removed from the sample location and transported to a laboratory for analyses. Before removal, however, a sample is often separated into portions depending upon the analyses to be performed. Each portion is preserved in accordance with applicable procedures and each sample container is identified by a sample label.

2. At a minimum, the following grab samples will be collected, in duplicate:

- Field Blank: See Section 9.B for discussion.
- Upstream: This sample will be collected far enough upstream of the SSO's point of entry into the surface water as to be free of contaminants from the SSO. Typically, 50-feet is sufficient, but this may vary on circumstances of the spill.
- Source: Immediate vicinity where the SSO entered the surface water. This point will actually be downstream of the actual SSO entry point for SSO's that have stopped entering the surface water to be sampled. If the SSO has stopped, calculate the approximate downstream distance from the original SSO location by dividing the time since the SSO occurred by the estimated velocity. This is the approximate downstream distance from the SSO discharge point to the "source" sampling location.
 - Due to possible tidal action in the surface water or other factors, another method may be used to determine the "source" location at the discretion of any of the following LROs:
- City Manager, Mary Gourley-LRO
- Oriana Hart, Public Works Director/Data Submitter
- Erik Billing, Public Works Operation Supervisor-LRO/Data Submitter
- "Downstream" of SSO: This sample will be collected far enough downstream to be representative of the water quality of the surface water after adequate mixing of the surface water and the SSO have occurred. Typically, this location will be 50-feet downstream of the Source sample, but this may vary on the size and velocity of the surface water to be sampled.
 - NOTE: The terms "upstream" and "downstream" may depend on the tidal cycle if the water body is tidally influenced. Check the tide chart(s) and table at the following link:
<http://tidesandcurrents.noaa.gov/noaatidepredictions/NOAATidesFacade.jsp?Stationid=9415623>.

3. Sample labels shall be completed for each sample, using waterproof ink. The information recorded on the sample tag/label includes:

- Date: a six digit number indicating the year, month, day of collection

- Time: a four-digit number indicating military time of collection (e.g., 0954)
 - Sample Location: sampling location description as either Upstream, Source, or Downstream
 - Samplers: each sampler is identified
 - Parameter/preservative: the analysis to be conducted for the sample /sample preservation
4. Photos or video of each sample location will be taken, properly labeled with date, time, and view direction and a map of the photo locations completed. Photos and videos shall include relevant landmarks to identify sampling locations and their surroundings.

Due to the evidentiary nature of samples collected during enforcement investigations, possession must be traceable from the time the samples are collected until they are analyzed. To maintain and document sample possession, a Surface Water Sample Chain of Custody Record (Attachment C) must be completed. A sample is under your custody if:

- It is in your possession, or
 - It is in your view, after being in your possession, or
 - It was in your possession and under your control to prevent tampering, or
 - It is in a designated secure area.
5. As few people as possible should handle samples. The person taking the samples is personally responsible for the care and custody of the samples collected until they are transferred or dispatched properly.
6. Samples are accompanied by a chain of custody record. When transferring the possession of samples, the individuals relinquishing and receiving will sign, date, and note the time on the record. This record documents sample custody transfer from the sampler, often through another person, to the analyst at the laboratory. The samples are typically transferred to the sample-receiving custodian at the laboratory.

E. Safety Considerations

Personal safety of staff engaged in any fieldwork activity (e.g., in transit, walking or hiking, and any field activities while at the sample site) is of primary importance. Staff should never place themselves in dangerous or risky situations. Any hazards that are known by field personnel should be communicated to other members of the field crew.

Fieldwork should be postponed if there is indication that engagement in the field activity could cause bodily harm. Working during lightning storms, at night, in heavy vegetation or poison oak, near aggressive wildlife or domestic animals, traversing steep or rugged terrain, unstable slopes or creek banks, near swiftly moving water or potential flash flood conditions, or during snowy weather is not considered "normal risk". If any member of the field crew is uncomfortable with a reasonable self-determined hazardous field condition, it is that person's responsibility to bring this to the attention of the on site field supervisor or their supervisor. A "reasonable self-determined hazardous field condition" is defined as other than normal risk. Supervisors shall

not dismiss any person's spoken concerns that field conditions are too hazardous to complete the work assignment.

The person taking the samples must have adequate protection, including protective clothing. They must wear gloves, as protection against chemical and/or bacteriological hazards, while they are sampling or handling samples that are known or suspected to be hazardous (e.g. visible solids or sheens, downstream from sewage spills, etc.), or if hands have open wounds. The type of gloves worn shall be determined by the sampling circumstance and type of pollutants expected – for instance longer gloves are needed when samples must be taken well below the surface.

When in a boat or wading in a stream, a personal floatation device shall be worn at all times. Other protective measures shall be taken in accordance with Sebastopol safety procedures.

Upon arrival at a sampling site, safety equipment such as signs, cones, lights, etc. shall be set out as appropriate. Vehicles shall be parked in locations and directions to minimize traffic disruption and avoid sample contamination. Photos should be ultimately taken of the placement of all safety equipment and signage

The following guidelines apply to all fieldwork by City staff.

- No sample or measurement is worth the risk of injury.
- All staff shall use proper personnel protective gear as appropriate for the incident (e.g., life preservers, gloves, goggles, etc.)
- Field sampling crews should consist of at least two members unless otherwise approved by a supervisor.
- Be conscious of the whereabouts of rattlesnakes, mountain lions, and other dangerous animals.
- Open body wounds are entry sites for infection; take the necessary precautions for self-protection.
- If there is storm activity in the work area, wait for safer conditions to develop or postpone the sampling.
- Do not sample at night without approval from your supervisor.
- Do not trespass on private property, or posted restricted public lands without prior permission and written approval from property owner or administrator.
- If strange or suspicious looking people are in the work area, either wait for them to leave or postpone the work to a later time. Do not force confrontations with strangers and back away from any confrontations with the public. Be courteous and understanding of public concerns of the situation.
- Take the necessary precautions against exposure to harmful weather conditions such as heat, wind, snow, cold, rain, etc.
- Carefully evaluate a given on-site situation to determine if the task can be performed safely.
- Wear protective footwear when entering streams.
- Do not enter the stream if the water is flowing too fast.

F. Stream Velocity Measurements

If sampling is performed after the SSO has stopped, the velocity of the impacted surface water should be determined in order to estimate SSO travel time and select an accurate Source sample location. One way to measure the SSO travel time is to use a velocity probe (such as a Global Water FP111-S Flow Probe) to determine the rate of flow in the water body. The City doesn't have one currently, but if a water velocity probe is used in the future, the manufacturer's instructions will be followed.

G. Grab-n-Go Sampling Kit

The City maintains a Grab-n-Go sampling kit located at the Public Works Corporation Yard. The kit is inspected quarterly by the Public Works Wastewater Treatment Operator. Additionally, any City staff utilizing the kit is responsible for decontaminating sampling equipment and field monitoring devices and replenishing the kit.

SSO Sample Collection Kit Inventory:

- Cooler
- Surface Water Sampling SOP (Attachment B)
- Ice Pack (stored in freezer)
- 5 Ammonia sample bottles, preserved (3 for samples, 1 for Field Blanks and 1 extra in the event of contamination, spillage of the preservative or other contingency)
- 5 sample bottles (3 for samples, 1 for Field Blanks and 1 extra in the event of contamination, or other contingency)
- Digital camera, with extra batteries
- Disposable nitrile gloves
- Safety glasses/goggles
- Surface Water Sampling Worksheet (Attachment D)
- Sampling Pole
- Field Lights
- Waterproof Pen
- Minimum of 20 blank sample bottle labels
- Chain of Custody form (Attachment C)
- Boat and personal floatation device (if applicable)

H. Surface Water Maps

Maps of surface waters in the Sebastopol service area that may be impacted by an SSO are located in Attachment F.

I. Follow Up Sampling

1. Sampling will be repeated every 24 hours, or as directed by the RWQCB or Sonoma County Environmental Health Department, until such time as one of the following criteria have been met:

- The County Environmental Health Department or the RWQCB indicates follow up sampling is no longer required, or
- Both the ammonia and bacteria levels downstream are approximately equal to or less than the upstream levels; or
- The concentration of ammonia is at or below that of the upstream sample, or the un-ionized ammonia is below 0.16 mg/L as N; and
The concentration of fecal coliform levels is below the applicable water quality objective levels for fecal coliform shown in Table 9.1 below for the appropriate beneficial use.

Beneficial Use	Fecal Coliform (MPN/100 mL)	Total Coliform (MPN/100 mL)	Enterococci (CFU/100 mL)	E. coli (CFU/100 mL)
Water Contact Recreation (REC-1) – Fresh Water	—	—	—	Geometric Mean $\leq$ 100STV $\leq$ 320
Water Contact Recreation (REC-1) – Marine/Estuarine Water	—	—	Geometric Mean $\leq$ 30STV $\leq$ 110	—
Shellfish Harvesting (SHELL)	90th Percentile $\leq$ 43	90th Percentile $\leq$ 230	—	—
Non-Contact Water Recreation (REC-2)	—	—	—	No specific bacteriological objective established

**Water Quality Control Plan (Basin Plan) for the North Coast Region, California Regional Water Quality Control Board, as amended.*

J. Surface Water Sampling SOP

The Surface Water Sampling SOP, Attachment B, provides step-by-step procedures to collect samples and deliver them for analysis in accordance with Sections 6, 7 and 9.

10. NOTIFICATIONS OF SENSITIVE RECEPTORS AND REGULATORY AGENCIES

Table 10.1 describes regulatory and other notifications that must be made in accordance with the triggers indicated:

Table 10.1 Notifications of Sensitive Receptors and Regulatory Agencies				
Contact	Trigger	Deadline	How	Person(s) Responsible
CalOES	Category 1 SSO of 1,000 gallons or greater that reaches surface water or a drainage conveyance that discharges to surface water.	2 hours after awareness of SSO	Call CalOES at (800) 852-7550.	
County Environmental Health	Notify when an SSO may pose a threat to public health	As soon as practicable	(707) 565-6565	
SWRCB	Category 1: Draft report within 3 business days; certify within 15 calendar days of SSO end date. Category 2: Same reporting timeline. Category 3:	Certified report within 30 calendar days after the end of the month in which the SSO occurred.	CIWQS*	
RWQCB				
Public Works Director	Any reportable spill	Within 24 hours	Phone Call	Public Works Staff
City Manager	Any reportable spill	3 Business days	email	Public Works Superintendent
Sonoma County Water Agency	If Spill Reaches the Russian River	2 Hours	Bus.Hrs. 707-526-5370 Aft. Hrs 707-523-1070	
Russian River Utility	If Spill Reaches the Russian River	2 Hours	707-887-7735	
Sweet Water Springs	If Spill Reaches the Russian River	2 Hours	707-869-4000	

** In the event that the CIWQS online SSO database is not available, notify the State Water Resources Control Board (SWRCB) by phone or email and provide required information until the CIWQS online SSO database becomes available.*

11. TECHNICAL REPORT

The Monitoring and Reporting Program (MRP) requires that, in the event of a Category 1 SSO in which 50,000 gallons or greater are discharged to surface waters, the City shall prepare and submit an SSO Technical Report. The Technical Report shall include a description of all water quality monitoring activities conducted, a map showing all sampling locations, analytical results, and an evaluation of the monitoring data in accordance with the requirements of the MRP. The Technical Report shall be submitted through the CIWQS Online SSO Database within 45 calendar days following the end of the SSO and shall be certified by the City's Legally Responsible Official (LRO).

City Manager, Mary Gourley-LRO

Oriana Hart, Public Works Director-LRO/Data Submitter

Erik Billing, Public Works Supervisor-LRO/Data Submitter

12. RECORDKEEPING

All sampling related records associated with this WQMP should be contained in the appropriate SSO Incident file designated with a specific locator record number. These records shall include at least the following documents related to the WQMP:

- A narrative description of water quality sampling activities associated with the event.
- Timeline of the sampling activities until sampling is terminated.
- All surface water sampling worksheets.
- Computations of spill travel time in surface waters, if appropriate.
- Chain of Custody for all samples.
- Sampling Map of all sample locations.
- All photos or video showing sampling activities.
- Final analytical results from the certified laboratory conducting the sample analysis along with an Agency evaluation of the results to determine the nature and impact of the release.
- Failure analysis reviews of the WQMP including recommendations for changes and modifications.
- Calibration records for specific equipment used in the sampling processes.
- Notification documentation for all public and private agencies involved with or requiring monitoring related to final sample results.

The City shall maintain all records including records from service contractors associated with this WQMP as part of the file records for an SSO as required by the WDR and MRP. These records shall be maintained for a minimum period of five-years from the end date of the SSO unless required by regulatory enforcement action, request of the State or Regional Board or as support for claims litigation resulting from the SSO. All records associated with the SSO shall be destroyed upon reaching the end of the file retention period or as otherwise required by the Regional or State Board.

Samples of all City forms and records used in this WQMP are included as attachments.

13. TRAINING

Training will be provided in accordance with Table 13.1.

Table 13.1 Sebastopol surface water sampling training program	
Who Is Trained To Collect Surface Water Samples?	PUBLIC WORKS MAINTENANCE STAFF
Trainer Qualifications	The trainer shall, by virtue of training, experience, education or a combination thereof demonstrate expertise in surface water sampling science, techniques and documentation.
Training Curriculum	at a minimum, training shall include: • The Sebastopol Water Quality Monitoring Plan • Sampling technique, including hands on practice • Sampling equipment calibration, use and decontamination procedures, including hands on practice • Sampling safety • Completion of the Sampling Equipment Calibration/Maintenance Log, Surface Water Sampling Report and Chain of Custody
Training Documentation	Attendees shall be required to sign-in to all training on the appropriate forms used by AGENCY.
Refresher Training Frequency	Annual
Who is Responsible for Ensuring Training Occurs?	PUBLIC WORKS OPERATIONS SUPERVISOR
Required Training Records	Employee training sign in log
Who is Responsible for Maintaining Records?	PUBLIC WORKS OPERATIONS SUPERVISOR

14. INTERNAL REVIEW AND UPDATE OF THE WQMP

The WQMP is a requirement of the WDR and MRP regulations and therefore the WQMP must be adopted by the City governing board when completed and thereafter at the same time as the new adoption of the SSMP every five years or when major changes to the SSMP are required. Internal reviews of the WQMP should be conducted at a minimum with City SSMP audits or with a failure analysis following a SSO event requiring the use of this WQMP. This latter evaluation should be used to determine if any procedures or program changes would improve the WQMP.

The internal review of the WQMP must include a thorough review of the then existing WQMP against actual performance by the agency staff and testing laboratory during and after the event. All documents associated with the water quality sampling should be reviewed and included in the SSO file and compared to the requirements in this Plan. Particular attention should be given to all dates and times associated with the monitoring, proper tests in support of the Regional Board Basin Plan, proper completion of the Chain of Custody, equipment calibration documentation of all equipment used for sampling and available photographs or video of the sampling processes, review and sign-offs by all responsible parties, review of the sampling locations map, final lab results and the certification report that the Technical Report was submitted within 45 calendar days of the end of the SSO to the CIWQS system.

In addition, the City should also conduct regular reviews of the WQMP at least annually or along with the tri-annual SSMP Audit required by the WDR. The review should be undertaken to determine that all information in the Program is current, that all classification responsibilities have not changed, that all forms are still appropriate and that all contract relationships with testing laboratories, if not associated with the agency, are still current and available 24 hours per day and 7 days per week. The review should also include a review of the Regional Board Basin Plan to assure continuing conformance with the Basin Plan.

This internal review should be conducted by senior management of the collection systems personnel, laboratory management and any outside contract laboratory services subsequent to any event or once per year if the WQMP has not had to be invoked during the preceding year.

Finally, a schedule and assignment of responsibility for completion of the recommended changes should be prepared along with additions to the SSMP Change Log for these changes and modifications of the WQMP.

CHANGE LOG

The new MRP, Section E.3 requires that all changes to the Sanitary Sewer Management Plan be recorded and documented using an SSMP Change Log indicating what section is being change, a description of the changes, and the person or persons authorizing the changes. Because the WQMP is required by the WDR and MRP, it is also necessary that changes to the WQMP be included in the documentation of changes to the SSMP. Any changes resulting from Section 14 above should be added to the Change Log of the SSMP upon implementation and adoption of the changes as required by the WDR.

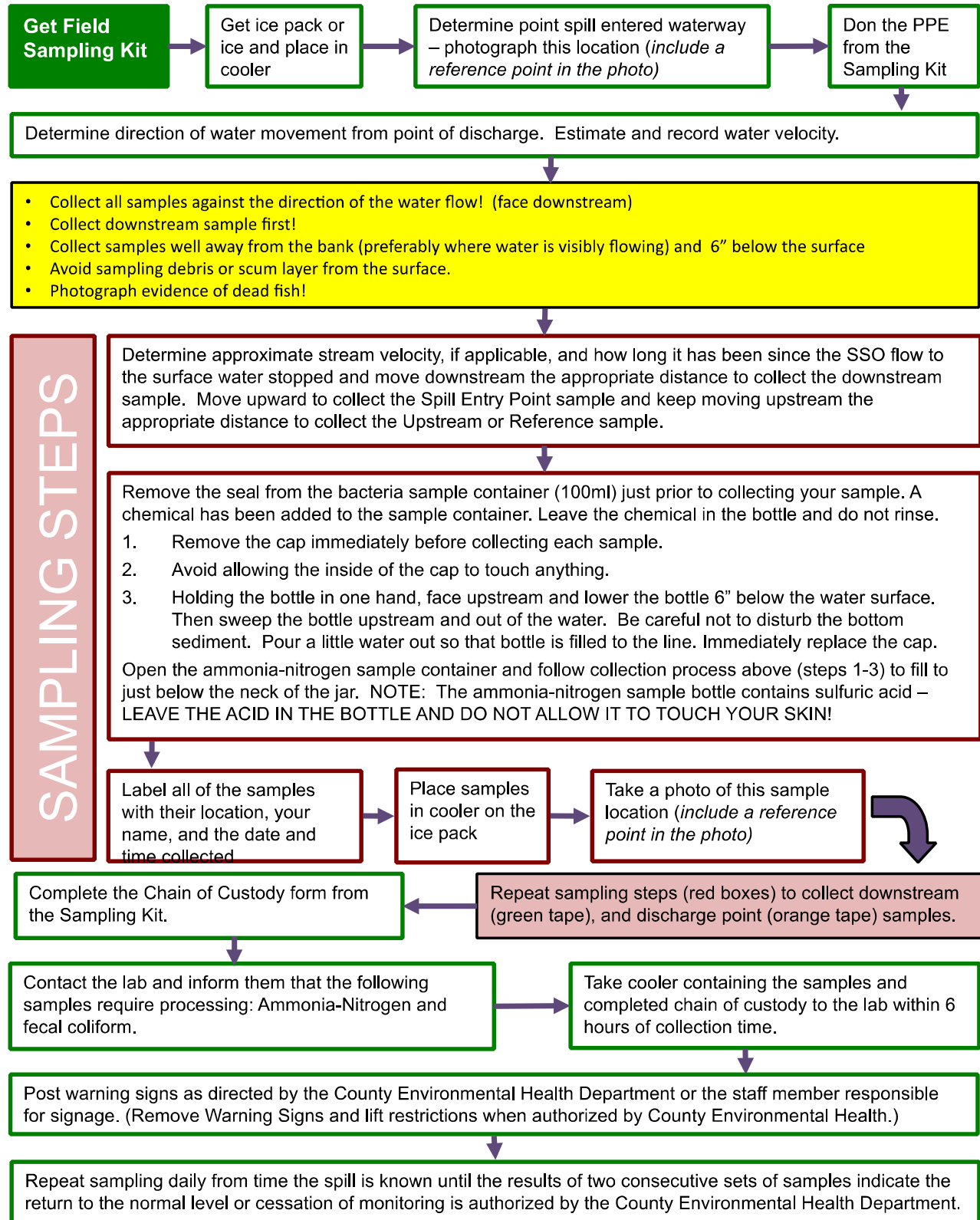
ATTACHMENT A
Water Quality Monitoring Plan Change Log

[illegible]

ATTACHMENT B
Surface Water Sampling SOP

City of Sebastopol
Water Quality Monitoring Program Plan

Surface Water Sampling Standard Operating Procedure



ATTACHMENT C
Sample Collection Chain of Custody Record

City of Sebastopol **Water Quality Monitoring Program Plan**
Surface Water Sample Collection Chain of Custody Record

Customer Name		☐	Hazardous Waste	PO#	
Customer Address		☐	Unknown Material	WO#	
Customer Telephone		Mail Code		CONTRACT LAB INFORMATION	
Program Name				Ship to:	☐ Normal (21 days) ☐ Rush: _____ ☐ Other: _____
Lab Program Coordinator		Phone #		Ship Date:	
Sampled By				Courier:	

LIMS# (Issued by Lab)	SAMPLE COLLECTION INFORMATION							# Containers	Matrix*	Analysis Requested					QA/QC Requirements	
	Date	Time	Type		Sample Location	Field pH	Field Temp			Ammonia	Enterococcus				☒	Lab Standard
			Composite	Grab											☐	Special (see attached)
Remarks/Notes																
			☐	☒	Upstream			2	A	☒	☒	☐	☐	☐		
			☐	☒	Entry Point			2	A	☒	☒	☐	☐	☐		
			☐	☒	Downstream			2	A	☒	☒	☐	☐	☐		
			☐	☐				2		☐	☐	☐	☐	☐		
			☐	☐				2		☐	☐	☐	☐	☐		
			☐	☐				2		☐	☐	☐	☐	☐		
			☐	☐				2		☐	☐	☐	☐	☐		

*Matrix: P = Potable Water, W = Wastewater, A = Ambient Water, G = Groundwater, S = Soil, B = Biosolids, I = Industrial, O = Other (specify in remarks)

Relinquished	Date	Time

Relinquished to	Date	Time

Transport/Shipping Information		
☐ USPS	☐ UPS	☐ FedEx
Tracing #:		
☐ Other:		

Sample Receiving Documentation

Container intact? ☐ Yes ☐ No	Correct container? ☐ Yes ☐ No	Field preserved? ☐ Yes ☐ No	Custody tape intact? ☐ Yes ☐ No
Cooled? ☐ Yes ☐ No	Temp. Blank? ☐ Yes ☐ No (°C)	Comments:	
Sample distribution: ☐ Lab bench ☐ Ice chest ☐ Walk-in cooler shelf #		Disposal Date:	Disposed by: (inits.)

City of Sebastopol **Water Quality Monitoring Program Plan**
Surface Water Sample Collection Chain of Custody Record

C-O-C Distribution courier	Date:	By:	☐ Lab Admin File	☐ Prog/proj Mgr.	☐ Lab Prog. Coord.	☐ Delivery courier	☐ Pick-up
-------------------------------	-------	-----	---	---	---	---	----------------------------------

ATTACHMENT D
Surface Water Sampling Worksheet

Surface Water Sampling Worksheet

Sample Date:	Sample Time: ☐ AM ☐ PM	Sample Location:	
Sampler(s)' Name(s):			
Sampler(s)' Signature(s):			
What is being sampled? ☐ Stream ☐ Pond ☐ Lake ☐ Lagoon ☐ Bay/Estuary ☐ Ocean ☐ River ☐ Other:		If the SSO was not actively entering the surface water during sampling: A. Stream Velocity: _____ CFS B. How Long Has the SSO NOT Been Entering the Surface Water? _____ minutes X 60sec/min = _____ seconds C. How Far Downstream Did You Travel To Collect The SOURCE Sample? (A X C = Feet): _____ feet D. Explain why you travelled a different distance, if you did, to collect the source sample:	
Weather at time of sampling: ☐ Sunny ☐ Overcast ☐ Sprinkling ☐ Raining ☐ Snowing			
Was the SSO actively entering the surface water during Sampling? ☐ YES ☐ NO If no, complete A-D in the gray box to the right →			

NOTE: Calibrate equipment prior to use and record in the Equipment Calibration/Maintenance Log

Sample Location	# of Samples*	pH	Temp. (°C)	DO (mg/l)	Photo ID# of Sample Location	Visual Observations and/or Interferences
Upstream						
Source						
Downstream						
Field Blank						

* Minimum of 2 per location

FINISH CHECKLIST	NOTES / OBSERVATIONS
☐ All Samples Labeled with: ☐ Date: a six-digit number indicating the year, month, day of collection ☐ Time: a four-digit number indicating military time of collection. e.g. 0954 ☐ Sample Location: Upstream, Source, or Downstream ☐ Samplers: each sampler is identified ☐ Parameter/preservative: analysis to be conducted for sample preservation ☐ Chain of Custody Completed ☐ Samples on Ice in Cooler ☐ Pictures Taken of Each Sample Location and the Photo ID/# Noted Above ☐ All Sampling Equipment Collected	

ATTACHMENT E
Technical Report

City of Sebastopol
Water Quality Monitoring Program Plan

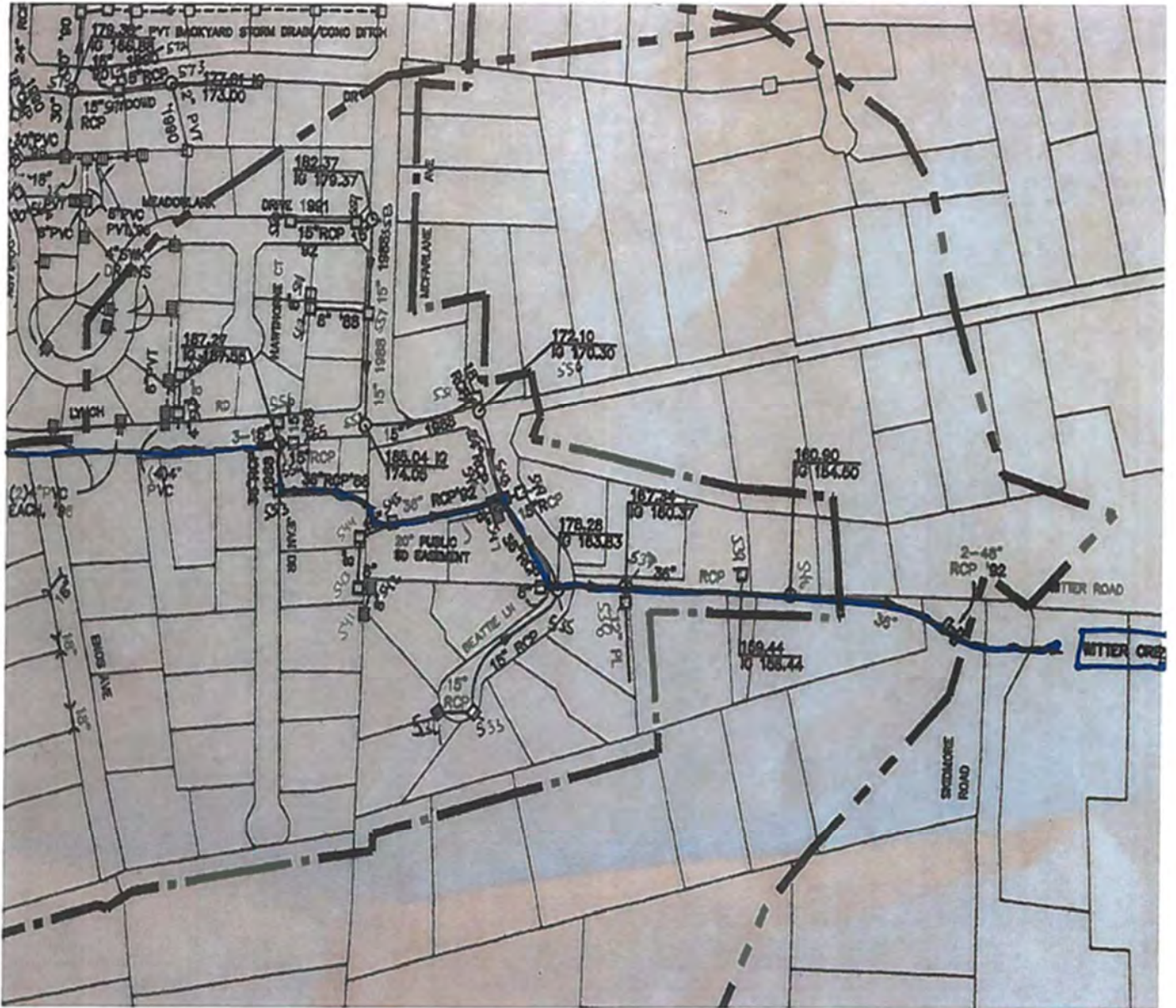
**Technical Report
Outline**

1. Introduction
 - Agency/system description
2. SSO Technical Report - Contents and Responses
 - a. Causes and Circumstances of the SSO
 - i. Detailed explanation of how and when SSO was discovered
 - ii. Diagram indicating SSO "Cause point", appearance point, and final destination (use attachments, maps and diagrams as needed)
 - iii. Detailed description of methodology employed and available data used to calculate the SSO volume and any volume recovered
 - iv. Detailed description of the cause(s) of the SSO
 - v. Copies of the original field crew records used to document the SSO (attachment)
 - vi. Historical maintenance records for the lines involved in the cause of the SSO (attachment)
 - b. Agency's Response to the SSO
 - i. Chronological narrative description of actions taken by agency to terminate the SSO
 - ii. Description of how the OERP was implemented to respond to and mitigate any impacts of the SSO
 - iii. Final corrective action(s) completed and/or planned, including a schedule for actions not yet completed
 - c. Water Quality Monitoring
 - i. Description of all water quality sampling activities conducted, including analytical results and evaluation of the results
 - ii. Detailed location map illustrating all water quality sampling points
3. Conclusions

**ATTACHMENT F
SURFACE WATER MAPS**



Zimpher Creek



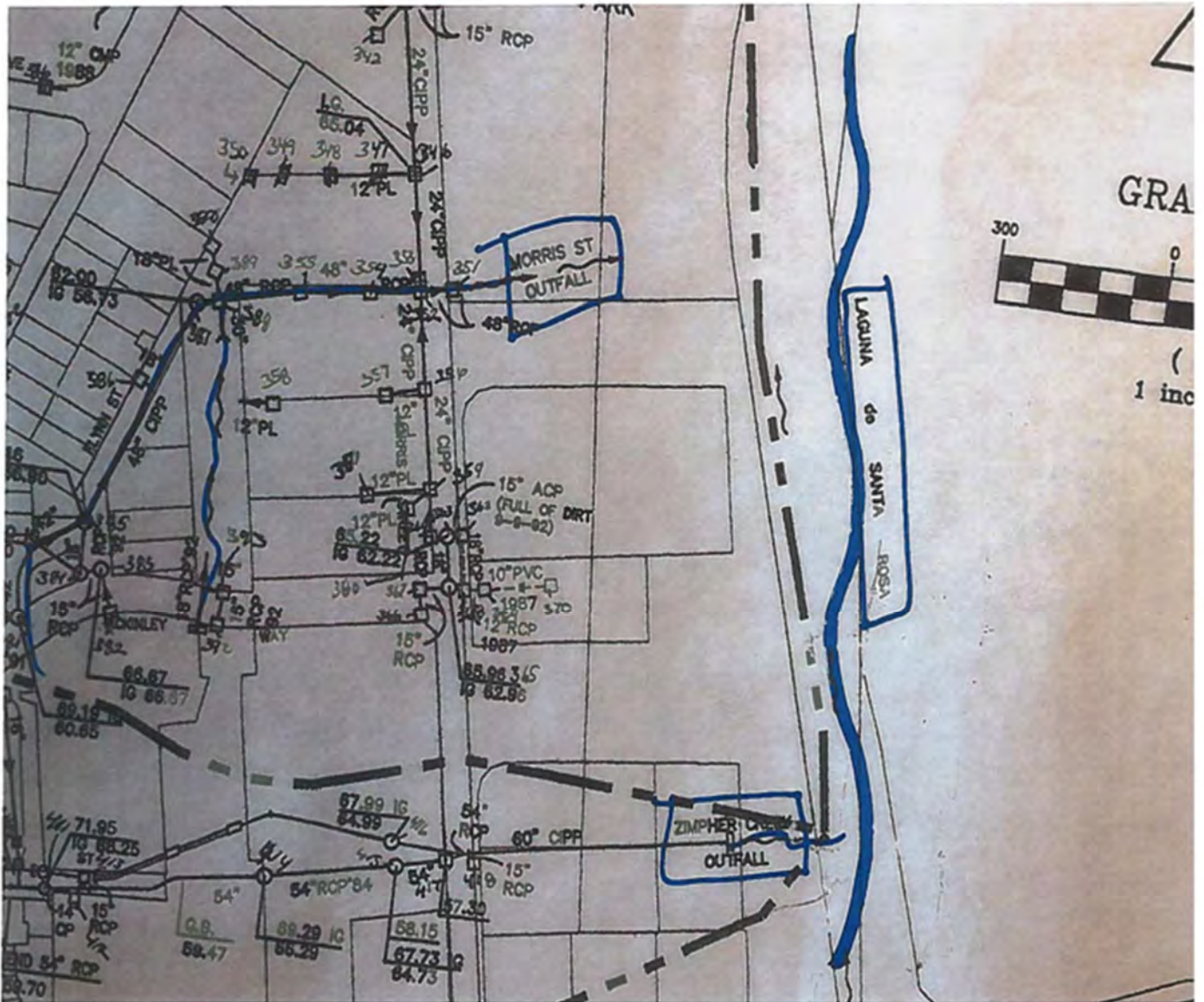
Witter Creek



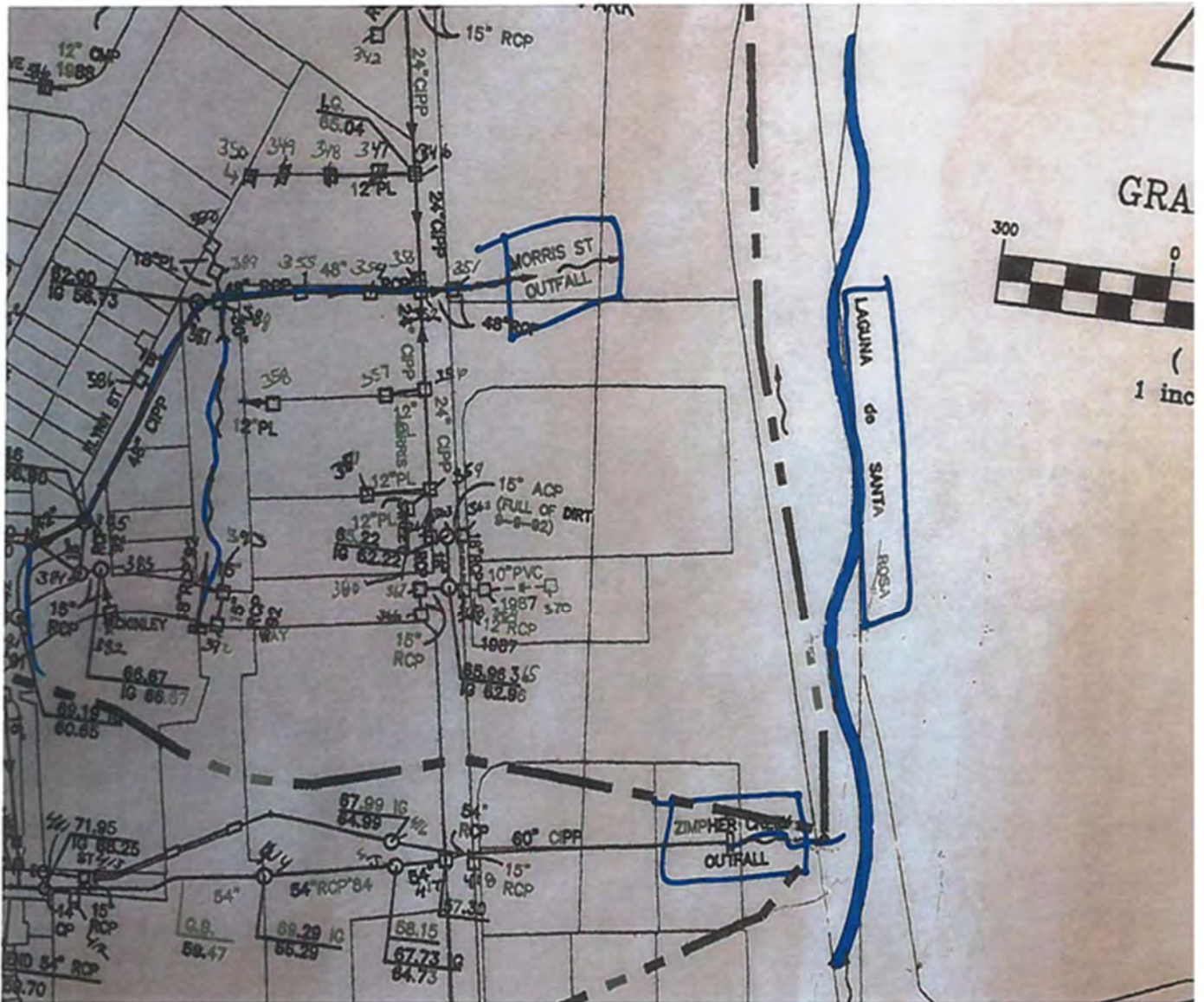
Atascadero Creek



Calder Creek



Laguna de Santa Rosa



Morris Outfall

Appendix C: Sewer System Management Audit Checklist

Appendix C: Sewer System Management Audit Checklist (2026)

**City of Sebastopol 2026
SSMP Audit Checklist
Report Form**

The purpose of the SSMP Audit is to evaluate the effectiveness of the City SSMP and sanitary sewer program and to identify any needed for improvement. The information identified here will be used to inform the possible findings and necessary information to be evaluated during the biannual Internal Audit of the City SSMP.

Directions: Please rank each item below utilizing the following sufficiency ranking system and add any comments to explain the ranking to the Comment Section of each SSMP Element:

- *Complies (C) - complies with all WDR objectives*
- *Substantially Complies (SC) - complies mostly with all WDR objectives*
- *Partially Complies (PC) - complies with basic WDR objectives*
- *Marginal Compliance (MC) - complies minimally with basic objectives of the WDR*
- *Does Not Comply - does not comply with WDR objectives*
- *Not applicable (NA) – does not need to be included in this Audit*

Element O - Introduction/Executive Summary	
A.	NA
B.	NA
C.	NA
D.	NA
Element I- Goals	
A. Are the goals stated in the SSMP Element I still appropriate and accurate?	C
Discussion:	
Element II - Organization	
A. Is the List of Staff Responsible for SSMP Elements current?	C
B. Is the Sanitary Sewer Overflow Responder List current?	C
C. Is the Organization Chart current?	C
D. Are the Staff position descriptions an accurate portrayal of staff responsibilities? Are the LRO and DSs properly identified in the position descriptions?	C

Appendix C: Sewer System Management Audit Checklist

E. Is the Chain of Communication for Reporting and Responding to SSOs section/flow chart accurate and up to date?	C
Discussion: There have been several staff changes and those changes will be noted in the revised Public Works organization chart and the Responder List has been updated as of beginning of fiscal year 2026/27	
Element III - Legal Authority	
Rating	
Does the SSMP contain current references to the Sebastopol Municipal Code documenting City's legal authority to:	
A. Prevent illicit discharges?	C
B. Require proper design and construction of sewers and connections?	C
C. Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the City?	C
D. Limit discharges of fats, oils, and grease?	C
E. Enforce any violation of its sewer ordinances?	C
F. Were any changes or modifications made in the past year to Sewer Ordinances, Regulations, or standards?	NA
Discussion:	
Element IV - Operations & Maintenance	
Collection System Maps	
Rating	
A. Does the SSMP reference the current process and procedures for maintaining City's wastewater collection system maps?	C
B. Are the wastewater collection system maps complete, current, and sufficiently detailed?	C
C. Are storm drainage facilities of the City and County identified in the City service area on the collection system maps? If not, are SSO responders able to determine locations of storm drainage inlets and pipes for possible discharge to waters of the state?	C
Prioritized Preventive Maintenance	
Rating	
D. Does the SSMP describe current preventive maintenance activities and the system for prioritizing the cleaning of sewers?	C
E. Based upon information in the Annual SSO Report, are the City's preventive maintenance activities sufficient and effective in minimizing SSOs and blockages?	C

Appendix C: Sewer System Management Audit Checklist

Scheduled Inspections and Condition Assessments		Rating
F.	Is there an ongoing condition assessment program sufficient to develop a capital improvement plan addressing the proper management and protection of infrastructure assets? Are the current components of this program documented in the SSMP?	C
Contingency Equipment and Replacement Inventory		Rating
G.	Does the SSMP list the major equipment currently used in the operation and maintenance of the collection system and documents the procedures of inventory management?	C
H.	Are contingency and replacement parts sufficient to respond to emergencies and properly conduct regular maintenance?	C
Training		Rating
I.	Does the SSMP document current training expectations and programs for staff and contractors?	C
Outreach to Plumbers and Building Contractors		Rating
J.	Does the SSMP document current outreach efforts to plumbers and building contractors?	C
Element V - Design and Performance Standards		Rating
A.	Does the SSMP reference current design and construction standards for the installation for new sanitary sewer systems, pump stations and other appurtenances and for the rehabilitation and repair of existing sanitary sewer systems?	C
B.	Does the SSMP document current procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and the rehabilitation and repair of existing sewer lines?	MC
Discussion: The City Standards do not include construction inspection requirements but are included in the Construction Notes and Details in sewer improvement plans and/or City encroachment permit requirements. Construction inspection requirements will be included in a future update to the City Standards.		
Element VI - Overflow and Emergency Response Plan		Rating
A.	Does the City Sanitary Sewer Overflow Emergency Response Plan establish procedures for the emergency response, notification, and reporting of SSOs?	C
B.	Are staff and contractor personnel appropriately trained on the procedures of the Sanitary Sewer Overflow Emergency Response Plan?	C

Appendix C: Sewer System Management Audit Checklist

C.	Considering SSO performance data, is the Sanitary Sewer Overflow Emergency Response Plan effective in handling SSOs in order to safeguard public health and the environment?	C
D.	Are all SSO and claims reporting forms current or do they require revisions or additions?	C
E.	Does all SSO event recordkeeping meet the SSS GWDR and MRP requirements? Are all SSO event files complete and certified in the CIWQS system?	C
F.	Is all information in the CIWQS system current and correct? Have periodic reviews of the data been made during the year to assure compliance with SSS GWDR? Have all Technical Report and Water Quality Sampling requirements been met and uploaded to the CIWQS data management system?	C
Discussion:		
Element VII - Fats, Oils and Grease (FROG) Control Program		Rating
A.	Does the FROG Control Program include efforts to educate the public on proper handling and disposal of FROG?	C
B.	Does the FROG Control Program identify sections of the collection system subject to FROG blockages, establish a cleaning schedule and address source control measures to minimize these blockages?	C
C.	Are requirements for grease removal devices, best management practices (BMP), record keeping, and reporting established in the FROG Control Program?	C
D.	Does City have sufficient legal authority to implement and enforce the FROG Control Program?	C
E.	Is the current FROG program effective in minimizing blockages of sewer lines resulting from discharges of FROG to the system?	C
F.	Was required training on SSMP and OERP completed and documented? Were field exercises with field staff on SSO volume estimation conducted and documented?	C
G.	Did all public improvement plans and specifications that could impact collection system operations include requirements for OERP training or were contractor OERP programs at least as stringent as the City OERP? Were regular items included in project meeting agendas to discuss emergency response procedures and communications?	C
Discussion: The City of Sebastopol contracts with the City of Santa Rosa to manage, implement, and enforce Sebastopol's FROG and pretreatment program. Although the City is in compliance, program effectiveness will be further evaluated with City of Santa Rosa inspection staff.		

Appendix C: Sewer System Management Audit Checklist

Element VIII - System Evaluation and Capacity Assurance Plan		Rating
A.	Does the City Sewer System Master Plan evaluate hydraulic deficiencies in the system, establish sufficient design criteria and recommend both short and long-term capacity enhancement and improvement projects?	MC
B.	Does the City Capital Improvement Plan (CIP) establish a schedule of approximate completion dates for both short and long-term capacity improvements and is the schedule reviewed and updated to reflect current budgetary capabilities and activity completed?	MC
Discussion: The City is currently updating its Sewer Master Plan, which will evaluate the hydraulic capacity and condition of the sewer system and provide recommendations to inform the FY 2027/28 Capital Improvement Program (CIP). An update to the SSMP will include the finalized list.		
Element IX - Monitoring, Measurement and Program Modifications		Rating
A.	Does the SSMP accurately portray the methods of tracking and reporting selected performance indicators?	C
B.	Is City able to sufficiently evaluate the effectiveness of the SSMP elements based on relevant information?	C
C.	Do the performance metrics properly support the Goals in Element 1?	C
Discussion: The Public Works Department prepares an Annual Report to the City Council each year in August and the Report is presented at a regularly scheduled City Council meeting.		
Element X - SSMP Audits		Rating
A.	Will the SSMP Audit be completed, reviewed and filed in Appendix B based upon the required time intervals since the original SSMP adoption date?	C
B.	Was the last Audit Report certified by the City LRO as required?	C
C.	Was the final Audit Report presented to the governing body at a publicly noticed meeting?	C
D.	Was the last Audit Report placed in the SSMP Appendix and added to the SCWD SSMP webpage.	C
Discussion:		
Element XI-Community Program		Rating
A.	Does City effectively communicate with the public and other agencies about the implementation of the SSMP and continue to address any feedback?	C
B.	Did the City receive and review the Annual Sewer System Report?	C

Appendix C: Sewer System Management Audit Checklist

C. Was the annual report uploaded to the City Sewer Section website and added to Appendix C?		C	
D. Did staff conduct and document meetings with the Pebble Beach Community Services City's satellite collection systems?		N/A	
E. Are all agreements with satellite systems current or are changes necessary to these agreements?		N/A	
Discussion: The City presented the 2020 SSMP at a City Council meeting that was publicly noticed and the 2022 Audit Report is also publicly noticed. Any comments and feedback are taken and recorded in City Council meeting minutes.			
Change Log			Rating
A. Is the SSMP Change Log current and up to date?			C
Discussion: The Change Log is current and up to date (Appendix D). The Public Works Department will mark up the 2026 SSMP to reflect the Change Log.			
Audit Team:		Date:	
Prepared By:		Date:	
Reviewed By:		Date:	
Certified By:		Date:	
Approved for Filing On		Date:	

Sanitary Sewer (SSO) Data for Calendar Year 2025

Calendar Year	Gravity Sewer SSOs	Pump Station SSOs	Force Main SSOs	Total Volume Spilled (Gallons)	Portion Contained and Returned to Sewers (Gallons)	Total Volume Entering Surface Waters (Gallons)
2014	2	0	0	826	1	825
2015	6	0	0	28,341	12	28,329
2016	5	0	0	1,310	328	982
2017	1	1	0	2,039	0	2,039
2018	4	0	0	1,926	271	1,655
2019	0	0	0	0	0	0
2020	1	0	0	19	19	0
2021	2	0	0	5,710	257	5,453
2022	1	0	0	22	22	0
2023	0	0	0	0	0	0
2024	3	0	0	71	50	21
2025	1	0	0	133	133	0

CY	Roots	Debris	Grease	Cap./Infil.	Vndl.	Pipe Failure	PS Failure	Force Main Failure	Other	Total
2014	2	0	0	0	0	0	0	0	0	2
2015	2	3	0	0	0	0	1	0	0	6
2016	3	1	1	0	0	0	0	0	0	5
2017	1	0	0	0	0	0	1	0	0	2
2018	2	2	0	0	0	0	0	0	0	4
2019	0	0	0	0	0	0	0	0	0	0
2020	0	1	0	0	0	0	0	0	0	1
2021	0	2	0	0	0	0	0	0	0	2
2022	0	1	0	0	0	0	0	0	0	1
2023	0	0	0	0	0	0	0	0	0	0
2024	3	0	0	0	0	0	0	0	0	3
2025	0	1	0	0	0	0	0	0	0	1
Total	13	11	1	0	0	0	2	0	0	27

