

## SSO WDR Enforcement Webinar Attendee Questions:

Besides SB, RBs and EPA, do contractors conduct inspections as well?

**EPA response:** Prior to the beginning of FY10 (October 1, 2009), EPA has used contractors to conduct collection system inspections, with EPA Regional staff present for the inspections. Since then, EPA Regional staff have been conducting the inspections without contractor support, and there are no plans to use contractors for the foreseeable future.

How does number of spills/ 100 miles of pipe play into this?

**EPA Response:** EPA has used the spill rate, #spills/year/100 miles of pipe, as a major factor in prioritizing collection systems for inspections. However, EPA is moving toward using additional factors, including, but not limited to spill volumes, # of spills reaching surface water, volume of spills reaching surface water, # of repeat spills, frequency of spills, and capacity related spills. EPA is very interested in the new metrics and prioritization strategy that the State is currently working on, and will coordinate closely with the State and Regional Boards in targeting systems for inspection in the future.

Is there any pre-notification given for inspection or audits? Is so, how much notice is given?

**EPA Response:** EPA generally likes to give about 5-6 weeks advance notice, mainly to provide time for the collection system to fill out the Collection System Information Form and return it to EPA for review before the inspection

Is the FOG Program inspected for record keeping, logs, enforcement within the program or only if there was a FOG related SSO?

**EPA Response:** The FOG program is reviewed for each inspection, but there will be more emphasis placed on the program when there are a high number of FOG related spills. We are especially interested in seeing that there is good communication between the FOG program staff and the collection system maintenance staff. In particular, there should be a mechanism for the maintenance staff to quickly inform FOG staff of grease related spills, and the FOG staff should in turn provide information to the maintenance staff that shows that an investigation occurred and results are provided.

Does the record keeping have to include SSO overflows from laterals cleanouts, or does it only pertain to Main Sewer Overflows from Manholes?

**EPA Response:** The specifics of the reporting requirements are up to the State, but we would want to see all spills that were caused by a problem in the parts of the collection system that the agency takes responsibility for. So, if there is an overflow from the cleanout that was caused by a back-up in the main, we certainly would want the information on that spill. Similarly, if the collection system takes responsibility for maintenance of the lower laterals, then they need to provide information on any spills from a cleanout that were caused by problems in the lower lateral.

We have two constructed overflow weirs meant to relieve the system in the event of storm events. These discharges can result in millions of gallons of dilute sewage (storm water combined with sewage) to be discharged. These are all reported. Will these events target us

for an audit/inspection? Mary - City of Richmond

**EPA Response:** As Jim said, we can't say for certain without looking at the specifics, but it would seem that the frequency of the overflows from these weirs might be a factor in looking at whether the collection system had taken adequate steps to control their I&I.

What criteria do you use to measure staff training?-Patrick Hassey

**EPA Response:** First we look at whether the system has a routine program for staff training and what that program generally consists of. We also look at the agendas for the courses, dates that training was provided over the last few years, records of attendance, and any course evaluations. We also like to talk to staff members, without managers present, who have attended the courses to try to get a first hand impression of the quality of the training provided. A possible criterion for measuring training is the number of staff who are certified in wastewater collection system O&M and how long they have had their certification.

During an inspection you ask for cleaning history for 10 years. Since agencies are not required to keep records for that long, what do you do if that much information is not available?

**EPA Response:** We would like to see the records as far back as possible, even if they are not available for the past ten years. This allows us to see the patterns of cleaning, and what the basis is for determining the frequency of cleaning. We expect that cleaning histories will become more readily available for longer periods of time as increased numbers of systems implement CMMS that contain the cleaning, inspection, and repair/replacement history for each segment of pipe.

Did I understand Jim to say that the optional questionnaire is for the agencies use only to help them prepare for a SWRCH audit?-Patrick Hassey

If we complete all of the electronic reporting requirements for a spill, is it still necessary to send a follow-up hard copy letter?

Is the EPA inspection form available to view?

Number of spills per 100 miles, what is the time period for determining the number of spills per 100 miles...rolling 12 months?

**EPA Response:** The inspection form is available as one of the materials that was provided for the webcast. The time period for spill rate is # of spills/year/100 miles. We usually calculate based on a calendar year, but we can choose any rolling 12 month period for comparisons.

How many years of records are you looking for? GWDR was not issued until 2007.

**EPA Response:** EPA is generally looking for five years of records. Even though the GWDR was not issued 2007, the types of records we would like to review are records that a collection system should be maintaining in any case in order to ensure that the system is being well operated and maintained.

for planning adequate capacity during a storm event should we use a 10 year or 100 year storm event?

What is the average number of SSOs per 100 miles?

What are some ways you verify that an adequate maintenance program is being implemented?

**EPA Response:** We look at work orders, CMMS records, frequency of cleaning, hot spot maintenance procedures, and the method that the collection system uses to schedule their inspection and cleaning programs. What are the criteria that the system uses to determine the frequency of cleaning? For example, are all pipes cleaned at the same frequency regardless of size, material, age, spill history, or are certain criteria given priority in determining maintenance schedules, and if so, what are they?

On the Sewage Collection System Inspection Form (EPA Region 9, March 2011) Don't you think it will be better to request SSO data from 2007 instead of 2005 to date? As you know, prior to 2007, different agencies reported SSOs differently. Some under reported while others over reported. So the pre 2007 information you obtain will be inconsistent and of no value - Nick Agbodo-LA County.

**EPA Response:** This is a good point. We do consider that the data prior to 2007 will be inconsistently reported throughout the State, so we do not weigh that as heavily as the information reported after that time. However, the system should have been keeping spill records all along, and so we want to see that data to show some general trends for the system itself, but not to compare it to other systems

As Michelle stated, 67% of flow comes from satellite systems, but nearly 100% of that flow comes from private laterals. Are you expecting to address I/I from private laterals?

Anthony Howard – LACounty SD

**EPA Response:** First – a clarification. When I was discussing the volume of flow contributed by Satellites, I was referring to EPA's National Priority Strategy which specifies that a collection system which holds the NPDES permit and which has Satellite systems cannot be considered addressed unless the collection systems which collectively contribute at least 67% of the volume going to the treatment plant are also addressed. Example:

Total flow to plant = 100 MGD

Flow contributed by NPDES permit holder = 40 MGD

Flow contributed by Satellite A = 10 MGD

Flow contributed by Satellite B = 30 MGD

Flow contributed by Satellite C = 20 MGD

EPA would have to ensure that, at a minimum, the collection system of both the NPDES permit holder and of Satellite B be addressed since they collectively contribute at least 67% of the volume going to the treatment plant. In addition, EPA may also choose to inspect the collection systems of Satellite A and/or Satellite B if there are significant SSO problems in these systems.

With regard to addressing I&I from private laterals, EPA expects that a well operated and maintained collection system will take steps to identify and control I&I from all parts of the collection system, especially if there are capacity related SSOs and/or excessive flows at the POTW caused by I&I issues in the collection system.

Has the industry considered moving from the term "Hot Spot" to "High Frequency PM"? hot spot seems to have a negative connotation.

**Christoph Dobson, Sacramento Area Sewer District:** My comments addressed standardizing the terms that agencies around the state use. Our recommendation is that, to the extent possible, CA sanitary sewer systems use the same terms when describing the same activities. We have heard the term "hot spot cleaning program" many times but didn't have a definition for this at our agency. We chose to create a definition and are just beginning to use it. We haven't heard any specific negative comments regarding the term "hot spot," but it certainly points out that each individual agency should carefully consider the terms they use, and ultimately must make the final decision as to whether to adopt a term commonly used by others.

**David Tucker, City of San Jose:** We concur that "hot spots" may have a negative connotation with the public and our agency has been moving toward the use "high priority cleaning" instead. We also support the use of similar terminology statewide to promote consistency and communication within our industry. We encourage our regulatory colleagues to work with our industry associations to promote the consistent use of terminology statewide.

When Michelle spoke about the audits/inspections leveling the playing field there was one bullet that said CWEA licensing. Was she referring to the CWA Collection System certification program? If so, does EPA feel that it should be a voluntary or mandatory program?-Patrick Hassey

**EPA Response:** Yes, I was referring to the CWA certification program. With regard to making the certification program mandatory, there is no current effort at the national level to require operator certification for wastewater collection systems, nor was there a certification requirement included in the draft Federal SSO/CSO regulations that were developed previously. However, we do evaluate the training programs offered by the collection system to ensure that operators are knowledgeable in their field, and we strongly encourage collection systems to provide incentives for their operators to pursue certification and engage in continuing education.

To Jim and Michelle: What information would field level staff be expected to answer during an audit? - John Hough

**EPA Response:** Field level staff would generally be expected to answer questions about the field activities in which they are involved. For example, staff on a cleaning crew might be asked to describe a typical routine cleaning operation – how they get their work orders for the day, the process that they use to track the cleaning that was done and what was found in the lines, how they ensure quality control in their cleaning procedures, what type of training they have had in cleaning processes, etc. Field staff on an SSO response crew will be asked how they are notified of a spill, what they first do when they get on site, how they estimate volume of flow and determine whether any flow went to the storm drain and/or surface waters, how they conduct clean-up activities, what reporting was done and when,

etc. We will often ask that the staff involved in a particular spill walk us through the response for that spill.

Question for Michelle - You mentioned that you were required to comply with the initiative requirements. I was wondering who implemented the requirements and through what process (i.e. congress, headquarters, etc.). What are the consequences for not meeting the targets?

**EPA Response:** To direct resources toward high priority areas, EPA identifies a set of goals and measures for each of these areas, and develops a strategy for achieving those goals. EPA reports to Congress, at least annually, on its progress in implementing the strategy and meeting the measures identified for that year. This ensures accountability to the public in carrying out the programs which protect public health. If the targets are not met in a particular year, the Congressional Committee which oversees EPA will likely require that EPA provide an explanation of why the targets were not met, along with a report on how EPA will ensure that they meet the targets for the next year.

how long do we keep field records 3 yrs or indefinite.

Can David provide the details of the NOV?

**David Tucker, City of San Jose:** Our NOV was focused upon corrective actions involving: [1] lack of detail to verify and document SSO details, including start times, duration, volume, volume recovered, etc. and [2] lack of adequate training to document SSO volumes. In our response, the City described corrective actions taken or that will be taken before long to alleviate each of the regulatory concerns outlined in the NOV. Please call me directly at 408-975-2553 if you would like to discuss our response in more detail