

**Notification Requirements for CMSA NPDES Permit Exceedances
and Collection System Sanitary Sewer Overflows**

Date: April 2, 2008 (Revised July 10, 2012)

1. Purpose

To outline the Agency's notification and reporting requirements and procedures for NPDES permit exceedances and Sanitary Sewer Overflows (SSOs).

2. Staff Notification

The following CMSA staff, in order of preference, shall be notified when a potential or actual NPDES permit exceedance occurs, or when an SSO from a sewer collection system occurs:

1. Environmental Services Manager, Robert Cole

Cellular: 707-953-5922

Home (1): 415-459-0459

Home (2): 707-894-2060

2. General Manager, Jason Dow

Cellular: 415-897-3858

Home: 415-897-3858

3. Treatment Plant Manager, Chris Finton

Cellular: 707-478-6260

Home: 707-584-3412

4. CMSA Operator in Charge (OIC)

415-459-1455 X 2

The first CMSA staff member notified will follow the notification and reporting procedures below.

3. Notification

The following is a list of agencies that may need to be contacted depending on the type of exceedance:

- California Emergency Management Agency—Cal EMA
Main Office: 916-845-8788

- County of Marin Environmental Health Services (EHS)
Main Office: 415-499-6907
Communications Center: 415-499-7237

- San Francisco Bay Regional Water Quality Control Board (RWB)
Vince Christian, Regional Engineer: 510-622-2336
Bill Johnson, Section Leader: 510-622-2354

- Sanitary District No. 2 of Marin, Corte Madera (SD#2)
Barry Hogue, Sanitary Services Manager: 415-927-5061
- County of Marin, Department of Public Works
Pat Echols, Principal Civil Engineer: 415-473-7026
Larry Beaton, Capital Planning & Project Manager: 415-473-6412
Eric Steger, Assistant Director: 415-473-2754
- California Department of Corrections (CDCR)—San Quentin
Andrew Crump, Correctional Plan Supervisor: 415-454-1460 X 5219
Randy Green, Plant Operations Chief Engineer: 415-454-1460 X 5611
Watch Commander, 24-hour contact number: 415-454-1460 X 5051

4. CMSA Final Effluent Exceedance and Sanitary Sewer Overflow Reporting Procedure

4.1. Overflows from the Treatment Facilities

Description

Any overflow from a treatment process, hauled waste discharger, or effluent storage pond that reaches the storm drain system or drainage canal, and cannot be contained and pumped back to the treatment plant.

Notification

The CMSA staff member who observes an SSO from a treatment process shall contact the Environmental Services Manager (see Section 2) immediately upon discovery of the spill. If the Environmental Services Manager cannot be contacted within one hour of the spill, or a message has been left with no response, CMSA’s Operator in Charge (see Section 2) will report the spill verbally to Cal EMA and Marin County EHS to meet the two hour reporting requirement.

- Document the date and time of the call, and the individual contacted.
- When contacting the above agencies, provide the following message:

“This is (*employee name*) from the Central Marin Sanitation Agency. I am calling to report that an overflow from the (*location or treatment process*) has occurred and was discovered at (*time*). It has resulted in a discharge to the storm drain system. We are notifying Marin County EHS and Cal EMA. We are performing an investigation of the incident and the findings will be included in our monthly Self-Monitoring Report. If you require a Report to be submitted an earlier date, please contact Environmental Services Manager, Robert Cole, at 415-459-1455, extension 142.”

Reporting

A verbal report must be submitted within two hours of the incident. A written report of the incident will be included in the Agency’s monthly self-monitoring report (SMR).

Sampling

During normal business hours, Environment Services (ES) staff will collect the below water samples. After business hours, Operations will collect the samples and place them in the laboratory sample refrigerator and notify ES staff.

- Collect samples for Enterococcus, and total and fecal coliform
- Samples sites are the following:
 - Drainage canal along the 580 freeway where the CMSA storm drain discharges
 - 100 feet upstream of the discharge point
 - 100 feet downstream of the discharge point

4.2. Final Effluent Exceedance

Description

Final effluent exceedances may occur if any of our instantaneous, daily, weekly, or monthly sampling or parameters exceed the limits specified in our permit. We have limits for the following compounds:

Compound	Analysis	Limit
Chlorine	On-Line Meter –Instantaneous	0.0 mg/L
Total Coliform	5 Sample Median	240 MPN/100 ml
	Daily Maximum	10,000 MPN/100 ml
Enterococcus	Monthly Geometric Mean	35 colonies/100 ml
pH	Grab	Range 6.0 – 9.0
Suspended Solids	Weekly Average	45 mg/L
	Monthly Average	30mg/L
	Monthly Removal Average	85%
CBOD	Weekly Average	40mg/L
	Monthly Average	25 mg/L
	Monthly Removal Average	85%
Cyanide	Daily Maximum	41.0 ug/L
	Monthly Average	49 ug/L
Copper	Daily Maximum	85 ug/L
	Monthly Average	49 ug/L
Mercury	Weekly	0.072 ug/L
	Monthly Average	0.066 ug/L
	Annual Mass Average	0.18 kg/mo
Oil and Grease	Monthly Average	10 mg/L
	Daily Maximum	20 mg/L
Acute Toxicity	11 Sample Median	90% survival
	11 sample 90 th percentile	70% survival
Chronic Toxicity	3 Sample Median	10 TUC
	Single Sample Maximum	20 TUC
Ammonia	Daily Maximum	120 mg/L
	Monthly Average	60 mg/L

Notification

The RWB must be notified within 24 hours of discovery of the exceedance by telephone. A written report may be required to be submitted within five days or on a case-by-case basis. The information may be included in the Agency’s monthly SMR. The Operator in Charge, if necessary

and in order to meet the 24 hour notification requirement will verbally notify the RWB of a Chlorine Residual exceedance if our Environmental Services Manager or an Environmental Services Staff member cannot be contacted within 24 hours. The below verbal message that is to be provided to the RWB should be stated in the following way:

“This is (*employee name*) from the Central Marin Sanitation Agency. I am calling to report a potential permit exceedance for (*Chlorine Residual*) that may have occurred and we are performing an investigation. The findings of the investigation will be included in the monthly Self-Monitoring Report. If you require a Report to be submitted an earlier date, please contact Environmental Services Manager, Robert Cole, at 415-459-1455, extension 142.”

Reporting

A verbal report to the RWB is required with 24 hours of discovery of the exceedance. The verbal report must be followed up by a written report in the monthly SMR or within five days if requested by the RWB. The information must include the parameter exceeded, the cause of the exceedance, and remedial actions to prevent the exceedance from recurring. Additional sampling results and findings from a potential investigation may also be required.

Sampling

Sampling is required if the exceedance is for a daily, weekly, or monthly limit. Samples must be collected on a daily basis until the analytical results of the exceeded constituent have fallen below the permit limits.

5. Collection System Sanitary Sewer Overflow Reporting

Services Agreement SSO Reporting Instructions

CMSA maintains service agreements with local and state agencies to operate and maintain sewer system assets. A provision in all our service agreements is the specific reporting requirements for Sanitary Sewer Overflows. The general waste discharge requirements (WDR) for SSO reporting are listed below. Specific reporting instructions and requirements for Sanitary District #2, San Quentin Village Sewer Maintenance District, San Quentin Pump Station, and CMSA JPA Member Agencies are listed in sub sections 5.1 through 5.4 below.

Description

Category 1 - All discharges of sewage resulting from a failure in the sanitary sewer that:

- Equal or exceed 1,000 gallons, or
- Result in a discharge to a drainage channel and/or surface water, or
- Discharge to a storm drainpipe that was not fully captured and returned to the sanitary sewer system.

Category 2 – All other discharges of sewage resulting from a failure in the sanitary sewer system:

- Reporting required in the monthly report that is submitted to the online database.
- Private Lateral Sewage Discharges – No reporting required.

Notification for Category 1 SSOs

The Cal EMA and Marin County EHS must be notified within two hours of the discovery of the spill.

The CMSA staff member who observes an SSO from the collection system shall contact the appropriate Agency, District, or State representative (see Section 3) immediately upon discovery of the spill. If a representative cannot be contacted within one hour of the spill, or a message has been left with no response, contact the appropriate CMSA staff in the order listed in Section 2, and the spill will be reported by CMSA. If CMSA staff makes the initial report to the regulatory agencies (see Section 3) on behalf of the Agency, Sanitary District, or State, the following statement shall be provided:

"This is (employee name) from the Central Marin Sanitation Agency. I am calling to report a sanitary sewer overflow from the (Insert Entity Here) in Marin County. The SSO occurred at (location) and was discovered at (time). We have stabilized the situation, and are notifying Marin County EHS and Cal EMA. (Insert Entity Here) shall perform an investigation of the incident and the findings will be included in their Self-Monitoring Report. If you require more information from (Insert Entity Here), please contact (Entity Representative Here), (Contact Phone Number Here)."

Note to Staff: Ensure that you have a Cal EMA report or case number for this incident before you hang up the phone.

Reporting

Provide the report and/or case number to the Agency representative who will prepare the required reports. Write down the Cal EMA report or case number that will be provided when making the call. A report must be filed with the SSO reporting system within three days and a final certified report is due within fifteen days.

Sampling

During normal business hours, Environmental Services (ES) staff will collect the below water samples. After business hours, Operations will collect the samples and place them in the laboratory sample refrigerator and notify ES staff.

- Collect samples for ammonia, enterococcus, and total and fecal coliform.
- Continue to collect above-specified daily until the affected area has been cleared by Marin County EHS.
- Samples sites are the following:
 - Drainage canals, along the roads/freeways, and anywhere the storm drains appear to discharge
 - 100 feet upstream of the discharge point
 - 100 feet downstream of the discharge point

Control the Spill

During business hours, the agency will work with CMSA to resolve the situation. If an agency representative is not available, CMSA will take all necessary actions to stabilize the situation.

Determine the source of the spill as rapidly as possible and then correct the problem and minimize the damage. Depending on the circumstances, CMSA staff may need to take several of the following steps:

- Call the necessary CMSA staff for help.
- Shut-off flow from upstream pump station.
- Dike, berm, sandbag or otherwise contain the spill to prevent it from entering a storm drain or body of water. If the spill has entered a storm drain, you may be able to stop the sewage from discharging from the other end of the storm drain.
- Repair the leak.
- Secure the contaminated area (cones, barricades, signs, etc.) to prevent public contact with the sewage.
- Post notification signage according to Section 7.
- Procure additional equipment and services as needed to assist.

5.1.Sanitary Sewer Overflows from Sanitary District #2 (SD#2) Pump Stations

Description

Any overflow from DS#2 that reaches the storm drain system or drainage canal, and cannot be contained and or pumped back into the sanitary sewer system.

Notification

The CMSA staff member who observes an SSO from the SD#2 system shall contact the SD#2 representative (see Section 3) as soon as practicably possible, but in no event later than 24 hours after the incident has been observed and/or addressed. If the SD#2 representative cannot be contacted within one hour of the spill, or a message has been left with no response, CMSA's Operator in Charge (See Section 2) will report the spill verbally to Cal EMA and Marin County EHS to meet the two hour reporting requirement.

If CMSA staff makes the initial report to the regulatory agencies on behalf of SD#2, (see Section 5) for instructions.

Reporting

SD#2 staff shall be responsible for meeting SWRCB and RWB sanitary sewer overflow reporting requirements. At the District's request and based on CMSA's staff availability, CMSA will assist with investigating the causes of the SSO, calculating the volume of sewage released from the collection system, and preparing written reports to the RWB and appropriate regulatory agencies as needed.

Sampling

CMSA staff will perform required sampling and analyses consistent with the requirements in Section 5.

Control the Spill

During business hours SD#2 will work with the CMSA to resolve the situation. If SD#2 staff is not available, CMSA will take all necessary actions to stabilize the situation.

5.2.Sanitary Sewer Overflow from San Quentin Village Sewer Maintenance District (SQVSMD)

Description

Any overflow from the SQVSMD that reaches the storm drain system or S.F. Bay, and cannot be contained and or pumped back into the sanitary sewer system.

Notification

The CMSA staff member who observes an SSO from the SQVSMD system shall contact the Environmental Services Manager (see Section 2) immediately upon discovery of the spill. If the Environmental Services Manager cannot be contacted within one hour of the spill, or message has been left with no response, CMSA's Operator in Charge (see Section 2) will report the spill verbally to Cal EMA and Marin County EHA to meet the two hour reporting requirement.

CMSA shall notify County of Marin, Department of Public Works (see Section 3) of any observed SSO as soon as practicably possible, but in no event later than the next business day after the incident has been observed and/or addressed.

Reporting

CMSA staff, per the service agreement with the County of Marin, shall be responsible for meeting SWRCB and RWB sanitary sewer overflow reporting requirements. CMSA will investigate the causes of the SSO, calculate the volume of sewage released from the collection system, and prepare written reports to the appropriate regulatory as needed.

Sampling

CMSA staff will perform required sampling and analyses consistent with the requirements in Section 5.

Control the Spill

CMSA staff will take all necessary actions 24 hours/day to stabilize and resolve the situation.

5.3.Sanitary Sewer Overflow from San Quentin Pump Station (SQPS)

Description

Any overflow from the SQPS that reaches the storm drain system or S.F. Bay Bay and cannot be contained and or pumped back into the sanitary sewer system.

Notification

The CMSA staff member that observed an SSO from the SQPS system shall immediately contact the CDCR San Quentin representative (see Section 3) upon discovery of the spill. If the San Quentin representative cannot be contacted within one hour of the spill, or message has been left with no response, CMSA's Operator in Charge (see Section 2) will report the spill verbally to Cal EMA and Marin County EHS to meet the two hour reporting requirements.

CMSA shall notify CDCR San Quentin representative as soon as practicably possible, but in no event later than 24 hours after the incident has been observed and/or addressed.

Reporting

CDCR shall be responsible for meeting SWRCB and RWB sanitary sewer overflow reporting requirements.

At CDCR's request and based on CMSA's staff availability, CMSA will assist with investigating the causes of the SSO, calculating the volume of sewage released from the collection system, and preparing written reports to the appropriate regulatory agencies as needed.

Sampling

CMSA staff will perform required sampling and analyses consistent with the requirements in Section 5.

Control the Spill

CMSA staff will take all necessary actions 24 hours/day to stabilize and resolve the situation.

5.4. Sanitary Sewer Overflows from Member Agency Collection Systems

Any SSOs observed within a JPA member agency's collection systems shall be reported pursuant to member agency call list and notification procedures. CMSA will notify the member agency of the spill location and time it was observed. The member agency is responsible for the reporting and notification requirements in the State's General Waste Discharge Requirements for Collection Systems.

CMSA staff, as requested, will assist member agency staff with notification sign placement and water sample collection and analyses (see Section 5). Generally and at a minimum, signs should be placed at the discharge location and 100 feet upstream and downstream of the discharge. See Attachment A for estimating SSO volumes.

6. Public Notification**Signage**

CMSA maintains an inventory of Raw and Partially Treated Sewage notification signs for posting at recreational areas or locations where the public may potentially contact wastewater that was spilled into the storm drain system, drainage channels, creeks, storage ponds, or lagoons downstream of the spill. Signs are kept in the environmental services outside storage area and SD#2 Paradise pump station.

The following are general notification and sign posting procedures, for agency specific posting practices, seek the agency's guidance and authorization.

- Notification signs shall be posted as soon as practicably possible after discovery of a sanitary sewer overflow from any CMSA operated or maintained collection system.
- Post signs that state "Raw Sewage Avoid Contact" if a discharge of untreated wastewater occurs.
- Coordinate with agency staff members on the appropriate locations to post the notification signs. Generally and at a minimum, signs should be placed at the discharge location and 100' around the affected area.
- Photograph the completed sign placement for the record.

- Signs shall be left posted until the potentially affected area is cleared by Marin County Environmental Health Services, or other appropriate regulatory agencies.

Signage—Treatment Plant

- Notification signs shall be posted as soon as practically possible after discovery of an overflow at the treatment plant.
- Post signs that state “Partially Treated Sewage” if a discharge occurs from any treatment process after the primary clarifiers.
- Post signs at the locations shown on the attached Maps #2 and #3 if the discharge is at the west drainage channel, or Map #4 if from the east drainage channel. (See Section 7)
- Photograph the completed sign placement for the record.
- Signs shall be left posted until the potentially affected area is cleared by Marin County Environmental Health Services and/or other appropriate regulatory agencies.

7. Public Reporting

When the public notifies Agency staff of a potential overflow or SSO, determine the location and if the discharge is from CMSA or a collection system. If from a collection system, notify the agency pursuant to Section 3. If from CMSA, notify the appropriate CMSA staff member in Section 2. If the public notification is on the weekend, holiday, or after normal Agency business hours, the OIC shall also send an email to the management staff in Section 2 summarizing the event.

8. Attachments

8.1.Attachment A- Estimating Sanitary Sewer Overflow Volume

8.2.Map 1-Overview of Spill Sign Locations

8.3.Map 2-Sign Locations, West Zone Near Highway 580

8.4.Map 3-Bayside Signs, West Zone Bayshore

8.5.Map 4-Sign Locations, East Zone