



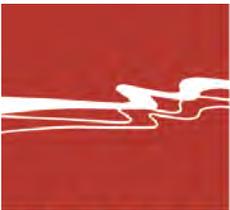
CITY OF BUELLTON

Sewer System
Management Plan
Revision 2

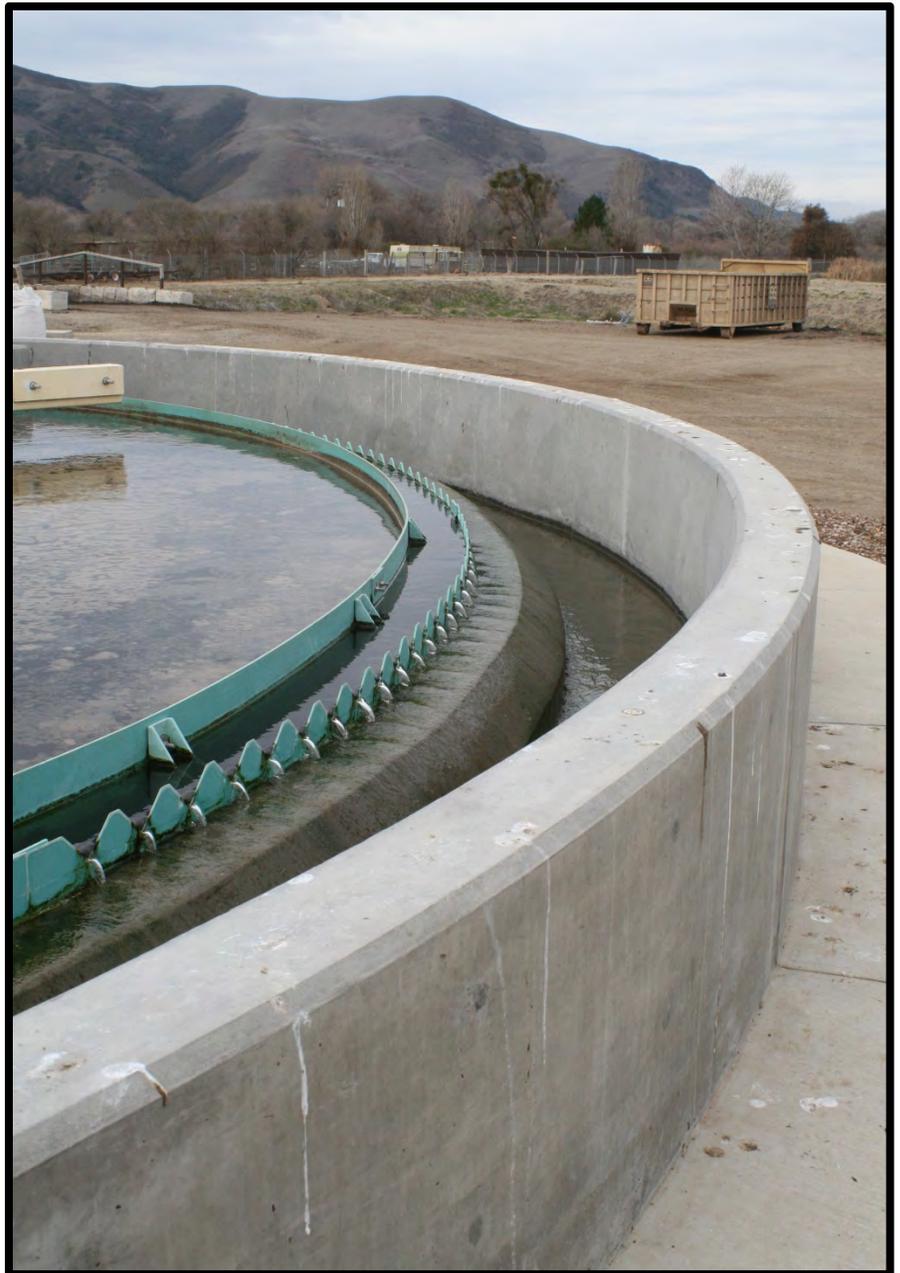
Public Version

May 28, 2015

PREPARED BY



WALLACE GROUP®





City of Buellton
SEWER SYSTEM MANAGEMENT PLAN
5 YEAR UPDATE
SSMP Revision 2
May 28, 2015

The Sewer System Management Plan, Revision 2 was created with the expertise of, assistance of, and documentation from the following City of Buellton and Wallace Group Staff:

City Staff

Rose Hess, PE; Public Works Director/City Engineer

John Sanchez; Lead Maintenance and Utilities Fieldworker (Sewer) & WWTP Chief Plant Operator

Wallace Group Staff

Bill Callahan; Director of Public Works Administration

Heather Billing; Senior Environmental Compliance Specialist

Anastasia Mylonas, EIT; Engineering Associate III

Jasmine Diaz, EIT; Engineering Associate I

CERTIFICATION STATEMENT

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.

Rose Hess, PE
Public Works Director/City Engineer

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ACRONYMS AND ABBREVIATIONS

| | |
|----------|---|
| BMP | Best Management Practices |
| Cal OES | California Government’s Office of Emergency Services (formerly Cal EMA) |
| Cal/OSHA | California Division of Occupational Health and Safety |
| CCR | California Code of Regulations |
| CCTV | Closed Circuit Television |
| CDFW | California Department of Fish and Wildlife |
| CFR | Code of Federal Regulations |
| CIP | Capital Improvement Plan |
| City | City of Buellton |
| CIWQS | California Integrated Water Quality System |
| CWEA | California Water Environment Association |
| EHS | Environmental Health Services |
| ELAP | Environmental Laboratory Accreditation Program |
| EOP | Emergency Operating Procedure |
| EPA | Environmental Protection Agency |
| FOG | Fats, Oil, and Grease |
| FSE | Food Service Establishment |
| GIS | Geographical Information System |
| HMA | High Maintenance Area |
| I/I | Inflow & Infiltration |
| IIPP | Injury and Illness Prevention Program |
| LRO | Legally Responsible Official |
| mgd | Million Gallons per Day |
| MRP | Monitoring and Reporting Program (Used in this SSMP to reference MRP Order No. WQ 2013-0058-EXEC, which is the MRP to WDR Order No. 2006-0003-DWQ.) |
| OERP | Overflow Emergency Response Plan |
| OES | Office of Emergency Services |
| O&M | Operation and Maintenance |
| OSHA | Occupational Safety and Health Administration |
| PLSD | Private Lateral Sewage Discharge |
| PM | Preventative Maintenance |
| PPE | Personal Protective Equipment |

ACRONYMS AND ABBREVIATIONS

| | |
|-------|--|
| R&R | Rehabilitation and Replacement |
| RWQCB | Central Coast Regional Water Quality Control Board |
| SCADA | Supervisory Control and Data Acquisition |
| SECAP | Sewer Evaluation and Capacity Assessment Plan |
| SOP | Standard Operating Procedure |
| SSOR | Sewer System Overflow Report |
| SSMP | Sewer System Management Plan |
| SSO | Sanitary Sewer Overflow |
| SSS | Sanitary Sewer System |
| SWRCB | State Water Resources Control Board |
| WDR | Waste Discharge Requirements (Used in this SSMP to reference WDR Order No. 2006-0003-DWQ, the Statewide General WDR for SSSs.) |

EXECUTIVE SUMMARY

The State Water Resources Control Board's (SWRCB's) Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems, Order No. 2006-0003-DWQ, and Amended Monitoring and Reporting Program (MRP), Order No. WQ 2013-0058-EXEC, require the City of Buellton (City) to have and maintain a Sewer System Management Plan (SSMP), which provides "a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system" in order to "help reduce and prevent sanitary sewer overflows (SSOs), as well as mitigate any SSOs that do occur" [Order No. 2006-0003-DWQ Section D.13(i)]. The SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification by the City Council is required in accordance with D.14 when significant updates to the SSMP are made. The City must enter the data in the Online SSO Database and mail the form to the State Water Board, as described above, to complete the re-certification process.

The 5 Year Update for the City's SSMP was completed in April 2015 and re-certified by the City Council on April 28, 2015.

The SSMP includes the following eleven (11) Elements:

1. Goal

The City's goals, which are included in the SSMP, are:

1. Be available and responsive to the needs of the public, and work cooperatively with local, state, and federal agencies to reduce, mitigate, and properly report SSOs.
2. Maintain documentation and update each SSMP Element, which contains schedules and plans to complete operations and maintenance tasks, engineering studies, and SSO monitoring, reporting and record keeping requirements, on an annual basis.
3. Maintain the number of SSOs to less than three (3) in a calendar year.
4. Have zero (0) capacity-related SSOs except those caused by storm events exceeding the design storm for that section of the collection system.
5. Have no more than one (1) SSO repeated within one (1) year from the same sewer line segment, manhole, or lift station.

2. Organization

The Organization Element of the SSMP identifies the City of Buellton Staff and Contract Staff, who are responsible for implementing the SSMP, responding to SSOs, and meeting the SSO reporting requirements, and identifies the lines of authority of SSO responsibilities and chains of communication for SSO response and reporting. The Legally Responsible Official (LRO) is also designated in this SSMP Element to meet the SWRCB requirements for completing and certifying SSO reports in the SWRCB's online regulatory information database and tracking system, California Integrated Water Quality System (CIWQS).

3. Legal Authority

This SSMP Element outlines the City Municipal Code Chapters that provide the City with the legal authority to:

- a. Prevent illicit discharges;
- b. Require that sewers and connections be properly designed and constructed;
- c. Limit the discharge of fats, oils, and grease (FOG) and other debris that may cause blockages; and
- d. Enforce any violation of its sewer ordinances.

4. Operation and Maintenance Program

The City's operation and maintenance (O&M) of its collection system ensures that the system is kept in good working condition, and this SSMP Element outlines the work that is conducted to accomplish the optimal O&M of the City's collection system. This SSMP Element details:

- a. Sanitary sewer system maps, which are developed and maintained in GIS;
- b. Preventative Maintenance (PM) Program, which consists of activities such as cleaning of sewer lines and other regular maintenance;
- c. Rehabilitation and Replacement (R&R) Plan, which focuses on sewer pipes at risk of collapse or prone to more frequent blockages due to pipe defects and includes a time schedule for funding and completing the capital improvement plan (CIP);
- d. Training program and records for City Staff and Contractor collection system O&M activities; and
- e. Equipment and replacement part inventory with critical replacement parts and equipment identified.

This SSMP Element will be updated with the CIP and associated time schedule and funding information developed from the results of the City's updated hydraulic and capacity assessment, which is scheduled to be completed by the end of fiscal year 2016/2017.

5. Design and Performance Provisions

The Design and Performance Provisions Element describes the standards and specifications for new construction, repair of the existing sanitary sewer system, and the inspection and testing of these items.

The City utilizes the City of Buellton Department of Public Works Standard Details and utilizes the *Greenbook: Standard Specifications for Public Works Construction* for

inspection and testing procedures and standards and through references to Sections and Subsections of the *Greenbook* in the City of Buellton Department of Public Works Standard Details. The State of California Department of Health Services' *Guidance Memo No. 2003-02: Guidance for the Separation of Water Mains and Non-potable Pipelines* is also used by the City to regulate the separation of water and sewer lines.

6. Overflow Emergency Response Plan

The Overflow Emergency Response Plan (OERP) contains the following information in order to protect public health and the environment in the event of a SSO:

- a. Notification procedures for primary responders and regulatory agencies;
- b. Notification procedures for regulatory agencies and other potentially affected entities for SSOs that potentially affect public health or reach the waters of the State;
- c. OERP training procedures for City Staff and Contractors responsible for responding to SSOs;
- d. Emergency operations procedures for response activities, such as traffic and crowd control; and
- e. A SSO mitigation and impact assessment program.

This SSMP Element was updated with a formal OERP training program which should be implemented by the end of July 2015.

7. FOG Control Program

The goal of the FOG Control Program is to reduce the amount of FOG discharged to the sanitary sewer system. This SSMP Element includes the following information:

- a. Public education outreach implementation plan and schedule;
- b. FOG disposal plan and schedule;
- c. The legal authority to prohibit FOG discharges and prevent associated SSOs;
- d. Grease control device installation, maintenance, best management practices, and record keeping and reporting requirements and design standards;
- e. High maintenance area identification and cleaning maintenance schedule; and
- f. FOG source control measure development and implementation for City Food Service Establishments (FSEs), which has included annually permitting and semiannual compliance inspections of FSEs since 2008.

8. System Evaluation and Capacity Assurance Plan

The 2006 Citywide Sewer Study consists of a sanitary sewer system hydraulic evaluation, which was used to establish some short- and long-term CIP. However, the Citywide Sewer Study did not evaluate the City's collection system capacity for wet weather flows and did not establish the design criteria required to evaluate the collection system's hydraulic capacity.

The City plans to update the Citywide Sewer Study in fiscal year 2016/2017 to address dry and wet weather flows and the design criteria required to evaluate the collection system's hydraulic capacity. After completion of this Study, the City will develop a CIP addressing any identified hydraulic deficiencies and provide information on CIP funding sources.

9. Monitoring, Measurement, and Program Modifications

The City monitors the implementation of the eleven (11) SSMP Elements in order to measure the effectiveness of the City's SSMP program in reducing SSOs. This SSMP Element outlines the manner in which each SSMP Element is monitored and evaluated and the schedule with which the City completes this monitoring and evaluation.

10. Sewer System Management Plan Program Audits

The SSMP Program Audits Element outlines the audit process and identifies the City Staff responsible for conducting or participating in SSMP Program Audits and generating the required SSMP Program Audit Report. SSMP Program Audits must occur at a minimum of every two (2) years and are required to evaluate the effectiveness of the City's SSMP Program, identify program deficiencies, and provide an improvement schedule based on the audit findings.

11. Communication Program

This SSMP Element describes the manner in which the City communicates the development, implementation, and performance of its SSMP with the public in order to provide them with the opportunity to provide input as the SSMP program is developed and implemented. The City has historically conducted outreach through City Council Meetings, the City website, print media, and social media.

INTRODUCTION

This Sewer System Management Plan (SSMP) was developed in compliance with the requirements of the State Water Resources Control Board (SWRCB) Statewide General Waste Discharge Requirements (WDR), Order No. 2006-0003-DWQ, and Amended Monitoring and Reporting Program (MRP) Order No. WQ 2013-0058-EXEC, which are both included in Appendix 0A.

The SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification by the City Council is required in accordance with D.14 when significant updates to the SSMP are made. The City must enter the data in the Online SSO Database and mail the form to the State Water Board, as described above, to complete the re-certification process.

0.1 Requirement Background

The WDRs require all public wastewater collection system agencies in California that own and operate sanitary sewer systems greater than one mile in length, which collect or convey untreated or partially treated wastewater to a publicly owned treatment facility, to develop, implement, and maintain a SSMP and report sanitary sewer overflows (SSOs) using the State's electronic reporting system, California Integrated Water Quality System (CIWQS).

The SSMP includes the following eleven (11) Elements:

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

Each SSMP Element is prefaced with the associated WDR section and narrated with the City of Buellton (City) policies and procedures, which address the respective SWRCB requirements.

0.2 City of Buellton System Overview

The City is located in the western Santa Ynez Valley of northern Santa Barbara County along Highway 101 halfway between Santa Barbara and Santa Maria. The City takes its name from the Buell family, who were instrumental in settling the area around the present-day City in the late 1800s.

The City was incorporated in 1992 and is steadily growing from a “crossroads” commercial center for automobile travelers to a place of interest. The total incorporated area of Buellton is approximately 1.6 square miles. Figure 0-1 provides an aerial overview of Buellton and identifies the City’s service area.

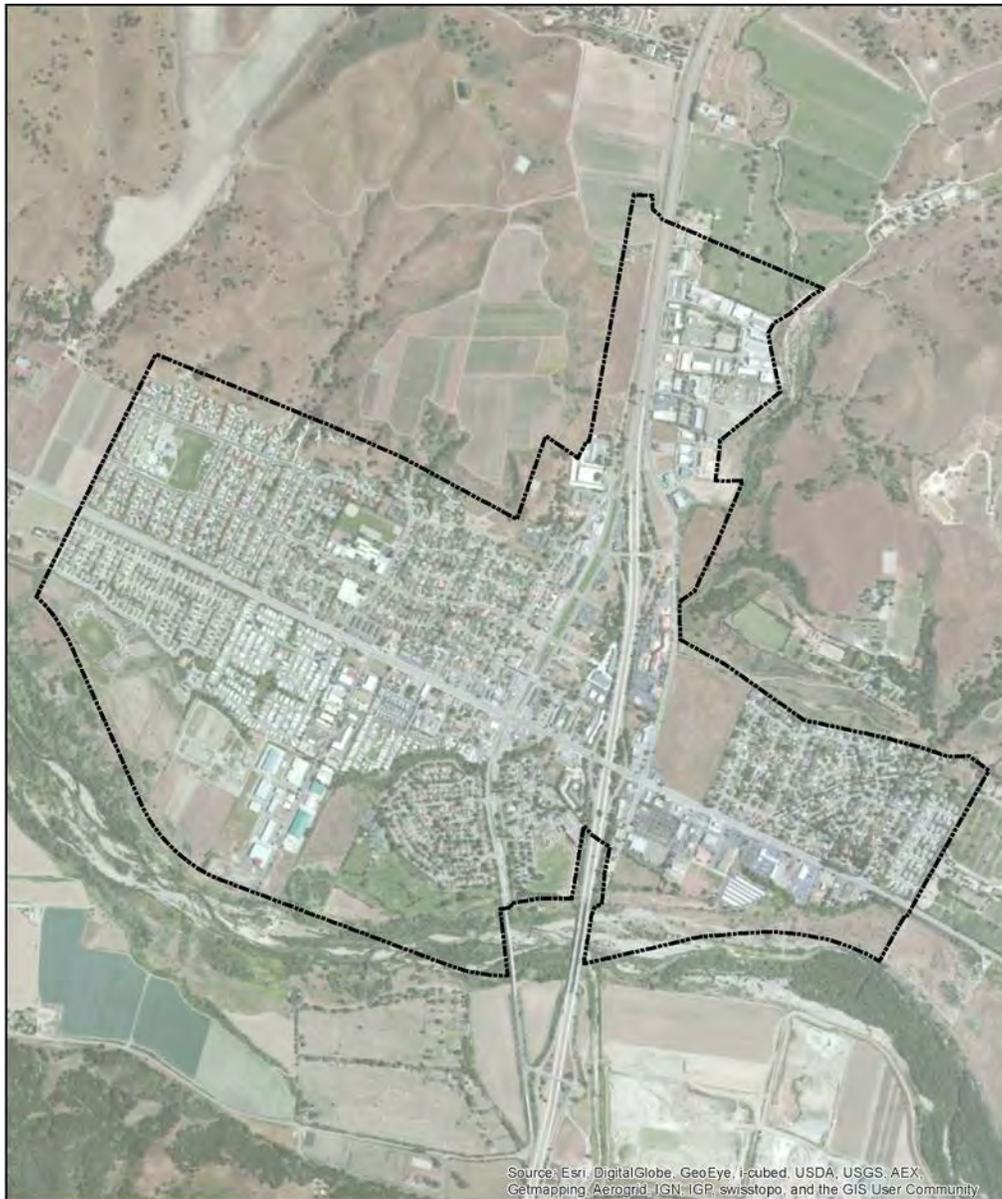


Figure 0-1: Buellton Service Area

The City of Buellton provides sewer services for residences, commercial, and industrial businesses, and serves a population of approximately 4,828¹ residents. The City's collection and conveyance system is mainly comprised of approximately twenty (20) miles of gravity pipelines, which vary in diameter from 6-inch to 15-inch, and eight hundred and fifty (850) feet of force mains.

Maintenance access to the sewers is provided by three hundred and seventy nine (379) manholes and a number of structures, such as clean outs and inspection holes. There are two (2) public sewer lift stations located in the City's service area that pump the City's wastewater to a City owned, operated and maintained wastewater treatment plant. The sewer lift stations are operated by the City, and Fluid Resources Management (FRM) is contracted to provide on-going maintenance for these lift stations.

0.3 Governing Body

Buellton was incorporated as a City in 1992. The City Council is comprised of five (5) members. Members of the City Council are elected at a general election held every 2 years and hold terms for a period of 4 years. The Mayor is voted by consensus by the Council annually.

The City Council governs the City and makes policy decisions with advice from the City Manager and City Attorney. City Council meetings are held in the Council Chambers at two (2) regular meetings each month. The City Council's authority and responsibility includes the adoption and approval of the SSMP and any formal updates to the SSMP. The SSMP formal update and adoption record is included at the beginning of the SSMP, and the City Council Meeting Minutes for the adoption of the current SSMP is included in Appendix 0B.

¹ Year 2010 United States Census

ELEMENT 1 - GOAL

The City of Buellton has the following goals for the management and maintenance of the sanitary sewer collection system. These goals provide focus for the City Staff to continue high-quality work to operate and maintain City facilities and to implement improvements for management of the collection system to prevent sanitary sewer overflows (SSOs). The role of the SSMP in supporting these goals is discussed below.

1.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(i) states:

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.

1.2 Sanitary Sewer System Goals [WDR D.13(i)]

The City seeks to provide high quality and reliable wastewater collection for its residents and businesses by meeting the following goals:

1. Be available and responsive to the needs of the public, and work cooperatively with local, state, and federal agencies to reduce, mitigate, and properly report SSOs.
2. Maintain documentation and update each SSMP Element, which contains schedules and plans to complete operations and maintenance tasks, engineering studies, and SSO monitoring, reporting and record keeping requirements, on an annual basis.
3. Maintain the number of SSOs to less than three (3) in a calendar year.
4. Have zero (0) capacity-related SSOs except those caused by storm events exceeding the design storm for that section of the collection system.
5. Have no more than one (1) SSO repeated within one (1) year from the same sewer line segment, manhole, or lift station.

ELEMENT 2 - ORGANIZATION

The Organization Element identifies the City of Buellton Staff and Contract Staff responsible for implementing this SSMP, responding to SSO events, and meeting SSO reporting requirements. This SSMP Element also outlines the City organization, SSMP responsibilities of personnel, authorized representatives, and chains of communication for SSO response and reporting. The Legally Responsible Official (LRO) is designated below in order to meet SWRCB requirements for completing and certifying SSO reports in CIWQS. Names of the current City Council members are available in Appendix 2A.

2.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(ii) states:

The SSMP must identify:

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

The aforementioned WDR Order No. 2006-0003-DWQ Section J states:

All applications, reports, or information shall be signed and certified as follows:

- (i) All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.)
- (ii) An individual is a duly authorized representative only if:
 - (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and
 - (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

2.2 Responsible and Authorized Representatives [WDR D.13(ii)(a)]

The name of the authorized representative described in WDR Section J above is listed in Table 2-1:

Table 2-1: City of Buellton Authorized Representative

| Name | Title | CIWQS SSO Database |
|------------------|-------------------------------------|------------------------------|
| Rose Hess | Public Works Director/City Engineer | Legally Responsible Official |
| Marc Bierdzinski | City Manager | Legally Responsible Official |

2.3 SSMP Program Implementation [WDR D.13(ii)(b)]

The names and contact information for management, administrative, and maintenance Staff who are responsible for implementing specific measures for the City’s SSMP Program are presented in Table 2-2 below along with their specific responsibilities.

An organization chart showing the lines of authority for all City Staff, consultants contracted with the City, and contract MNS Staff described below in Table 2-2 is included in Appendix 2B.

Table 2-2: Staff and Contract SSMP Responsibilities and Contact Information

| Name and Title | SSMP Responsibilities | Contact Information |
|---|--|--|
| Marc Bierdzinski City Manager <i>City of Buellton</i> | <ul style="list-style-type: none"> The City Manager directs the Public Works Director/City Engineer in the management of all eleven (11) SSMP Elements. | [REDACTED] (805) 686-0137 Office E-mail: marcb@cityofbuellton.com |
| Steve McEwen City Attorney <i>Burke, Williams, and Sorensen, LLP– Contract with City of Buellton</i> | <ul style="list-style-type: none"> The City Attorney assists the Public Works Director/City Engineer to manage Element 3 – Legal Authority. | [REDACTED] [REDACTED] [REDACTED] |



| Name and Title | SSMP Responsibilities | Contact Information |
|--|---|---|
| <p>Rose Hess</p> <p>Public Works Director/City Engineer</p> <p><i>City of Buellton</i></p> | <ul style="list-style-type: none"> ▪ The Public Works Director/City Engineer directs City and City Contract Staff in the management of all eleven (11) SSMP Elements. | <p>(805) 688-5177 Office [REDACTED]</p> <p>E-mail: roseh@cityofbuellton.com</p> |
| <p>Administrative Staff</p> <p><i>City of Buellton</i></p> | <ul style="list-style-type: none"> ▪ The City Accounting Technicians receive and assure that the appropriate City Field Worker respond to in person communications, phone calls, e-mails, and faxes to assist with the implementation of: <ul style="list-style-type: none"> - Element 4 – Operation and Maintenance Program; - Element 6 – Overflow Emergency Response Plan; - Element 7 – FOG Control Program; - Element 11 – Communication Program. ▪ In a SSO response, could provide a carefully pre-scripted message for citizens who call with general questions. | <p>(805) 688-5177 Office</p> |
| <p>Jeff Edwards Kent Yankee</p> <p><i>Deputy and Assistant City Engineers</i></p> <p><i>MNS Engineers—Contract with City</i></p> | <ul style="list-style-type: none"> ▪ MNS Engineers, Inc. is under contract to assist the City Engineer and is directed by the Public Works Director/City Engineer to manage the CIP and design and inspection services in the implementation of: <ul style="list-style-type: none"> - Element 4 – Operation and Maintenance Program, Rehabilitation and Replacement Plan; - Element 5 – Design and Performance Provisions; | <p>(805) 688-5200 MNS Office [REDACTED] [REDACTED]</p> <p>E-mail: jedwards@mnsengineers.com kyankee@mnsengineers.com</p> |



| Name and Title | SSMP Responsibilities | Contact Information |
|---|---|--|
| | <p>and</p> <ul style="list-style-type: none"> - Element 8 – System Evaluation and Capacity Assurance Plan. | |
| <p>Mike Ellison Steven Neff</p> <p>Operators</p> <p><i>Fluid Resources Management (FRM) – Contract with City</i></p> | <ul style="list-style-type: none"> FRM Operators perform routine operation, preventative maintenance, and repair and major maintenance services for the City owned lift stations as described in Element 4 – Operation and Maintenance Program. Communicates maintenance results for the City lift stations in quarterly inspection reports to the Public Works Director/City Engineer. | <p>(805) 597-7100 Office</p> <p>E-mail: mikee@frm-ops.com</p> |
| <p>Bill Callahan</p> <p>Environmental Compliance Specialist</p> <p><i>Wallace Group – Contract with City</i></p> | <ul style="list-style-type: none"> The Environmental Compliance Specialists manage the City FOG Program permitting, inspections, enforcement, and outreach services as described in Element 7 – Fats, Oils, and Grease Control Program. Delivers a monthly FOG Program inspection summary report to the Public Works Director/City Engineer. | <p>(805) 544-4011 Office</p> <p>E-mail: billc@wallacegroup.us</p> |
| <p>John Sanchez Ray Ochoa Joe Meehan Kurt Greer</p> <p><i>Maintenance and Utilities Field Workers - City of Buellton</i></p> | <ul style="list-style-type: none"> City Field Workers perform management, operations and maintenance in the City Public Works (PW) Department. The PW Department is responsible for streets, curbs and gutters, sidewalks, sewer system, storm drain system, and water systems. City Field Workers are responsible under the direction of | <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> |



| Name and Title | SSMP Responsibilities | Contact Information |
|----------------|---|---------------------|
| | <p>the Public Works Director/City Engineer for the following SSMP Elements:</p> <ul style="list-style-type: none"> - Element 4 – Operation and Maintenance Program; - Element 6 – Overflow Emergency Response Plan; - Element 7 – FOG Control Program. <ul style="list-style-type: none"> ▪ Field Workers respond to SSOs with cleanup tools, notify regulatory agencies, document response activities using City procedures, assist in determining cause of SSO, and assist in implementing corrective actions to prevent recurrence of future SSOs. | |

2.4 Chain of Communication for Responding to SSOs [WDR D.13(ii)(c)]

SSO reports usually begin with a call from a resident to the City Public Works Department, 911 dispatchers, or the Santa Barbara County Sheriff and Fire Departments.

The City Public Works telephone contact number is (805) 688-5177.

After hours, the City contracts with an answering service (Echo Communications) which has the City of Buellton Phone List and contacts the appropriate City Staff person to respond.

The Santa Barbara (SB) County Sheriff and SB County Fire personnel also have the City of Buellton Phone List which is used if they are called.

The Public Works Call Out List is included in SS-EOP-02: SSO Notification Attachment 1, which will be provided in SSMP Element 6 – Overflow Emergency Response Plan Appendix A by June 2015, and has the names of the City Field Worker Staff and the order in which they are on-call to respond to public works issues outside of normal City business hours.

During the process of responding to a SSO, the following actions are taken to verify the report and ensure the safety of the public:



1. During Public Works business hours, the Public Works Director/City Engineer, Rose Hess receives the call from a citizen, SB County Sheriff, or SB County Fire Department and obtains the location of concern and a description of the problem. The name and phone number of the caller is requested and documented if not anonymous for follow-up information.
2. After hours, City Dispatch (Echo Communications), SB County Sheriff, or SB County Fire Department contact the on-call City Field Worker Staff and direct them to the described location. The Overflow Emergency Response Plan (OERP) contained in Element 6 is initiated.
3. City Field Worker Staff proceed to the location to verify the report.
4. If a SSO is verified, Field Worker Staff member contacts the Public Works Director/City Engineer and requests support.
5. The Public Works Director/City Engineer notifies the City Manager, Marc Bierdzinski both during and after business hours.
6. Cal OES must be contacted within two (2) hours of an SSO, when the SSO is greater than or equal to 1,000 gallons to a surface water.

SSMP Element 6 – Overflow Emergency Response Plan and SS-EOP-01: Overflow Emergency Response Program, which will be provided in SSMP Element 6 – Overflow Emergency Response Plan Appendix A by June 2015, contains a chain of communication for reporting SSOs for use in the field by the City Field Worker Staff or the Public Works Director/City Engineer. This chain of communication is reproduced in Figure 2-1 for reference.

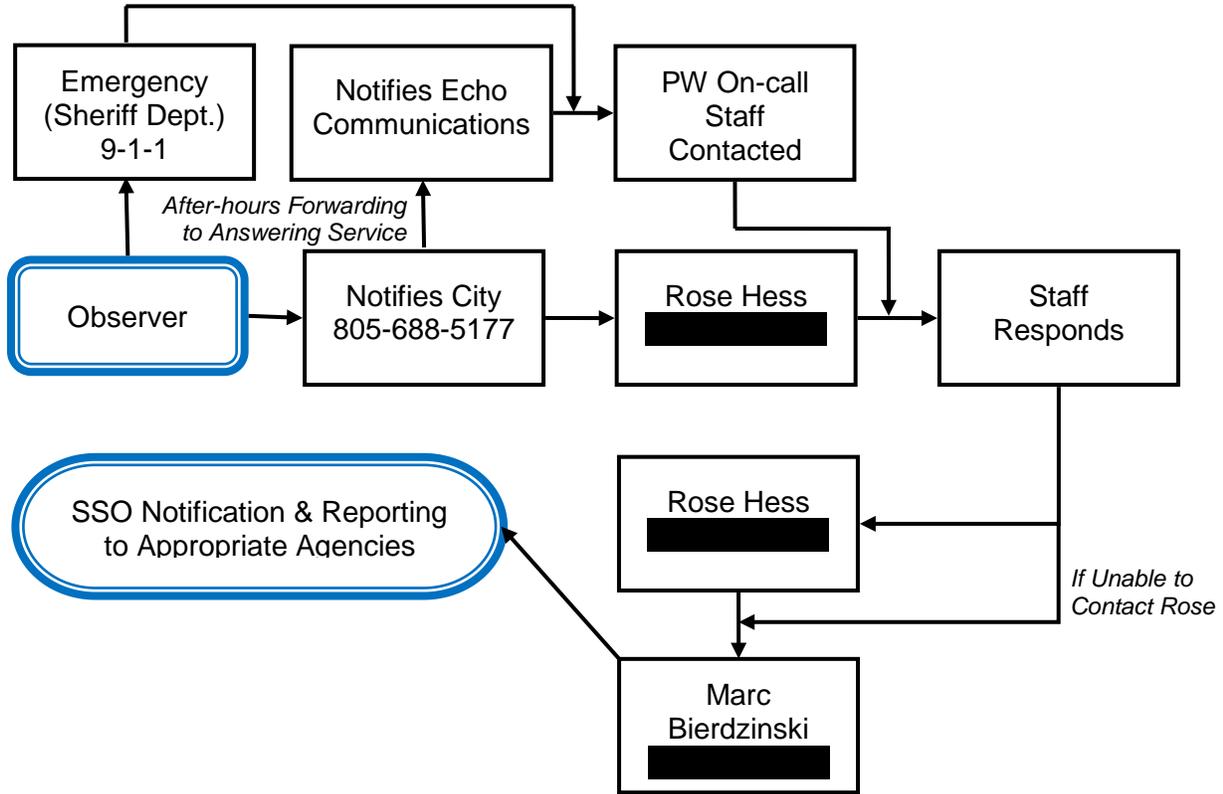


Figure 2-1: SSO Response Chain of Communication

SSO notification is outlined in SSMP Element 6 – Overflow Emergency Response Plan and will be outlined in SS-EOP-02: SSO Notification by June 2015. The contact information and notification requirements associated with notifying RWQCB and other applicable agencies, such as Cal OES, are included in that SSMP Element and will be included in that EOP upon its completion.

Upon completion of containment and clean-up, the Public Works Director/City Engineer, Rose Hess or the designee will use SS-EOP-03: SSO Reporting Attachment 1: Reporting SSOs in CIWQS, which will be provided in SSMP Element 6 – Overflow Emergency Response Plan Appendix A by June 2015, to initiate the Draft SSO Report in CIWQS.

ELEMENT 3 - LEGAL AUTHORITY

The City maintains the legal authority over the sanitary sewer system in the City Municipal Code Sections described in and included as the appendices to this Element. The City Municipal Code was adopted in 1995 and is available on the City's website: www.cityofbuellton.com.

3.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(iii) states:

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 Inflow & Infiltration (I/I), storm water, 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.

3.2 Illicit Discharge Prevention [WDR D.13(iii)(a)]

Illicit discharges, such as stormwater, debris, chemicals, waste, roots, concrete, etc., are addressed in the City Municipal Code Sections, which are identified below and included in the identified appendices.

Table 3-1: Illicit Discharge Prevention Legal Authority

| Municipal Code Section | SSMP Element 3 Appendix |
|---|-------------------------|
| 14.08.020 – Treatment of wastes required. | 3A |
| 14.24.010 – Drainage into sanitary sewers—Prohibited. | 3B |
| 14.24.030 – Specific discharge prohibitions. | 3C |

3.3 Sewer and Connection Design and Construction [WDR D.13(iii)(b)]

The proper design and construction of sewers and connections is required by the following City Municipal Code Sections from City Municipal Code Chapters 14.16: Building Sewers, Lateral Sewers, and Connections and 14.20: Public Sewer Construction, which are included in Appendix 3D and Appendix 3E, respectively, as identified below:

Table 3-2: Sewer and Connection Requirements

| Municipal Code Section | SSMP Element 5 Appendix |
|--|--------------------------------|
| 14.16.010 – Permit—Required. | 3D |
| 14.16.020 – Construction requirements. | 3D |
| 14.16.030 – Sewer materials. | 3D |
| 14.16.040 – Minimum size and slope. | 3D |
| 14.16.050 – Building drain. | 3D |
| 14.16.060 – Joints and connections. | 3D |
| 14.16.070 – Connection to public sewer. | 3D |
| 14.16.080 – Separate sewers. | 3D |
| 14.16.090 – Old building sewers. | 3D |
| 14.16.100 – Sewer too low. | 3D |
| 14.16.110 – Protection of excavation. | 3D |
| 14.16.120 – Maintenance of side sewer. | 3D |
| 14.16.130 – Backflow protection device. | 3D |
| 14.20.010 – Permit—Required. | 3E |
| 14.20.020 – Plans—Profiles and specifications—Required. | 3E |
| 14.20.030 – Subdivisions. | 3E |
| 14.20.040 – Easement or right-of-way. | 3E |
| 14.20.050 – Persons authorized to perform work. | 3E |
| 14.20.060 – Grade stakes | 3E |
| 14.20.070 – Compliance with local regulations. | 3E |
| 14.20.080 – Protection of excavation. | 3E |
| 14.20.090 – Compliance with occupational safety and health acts. | 3E |
| 14.20.100 – Design and construction standards. | 3E |

3.4 Publicly Owned Lateral Access [WDR D.13(iii)(c)]

The City does not own or maintain laterals except to City-owned properties. Therefore, this section is not applicable.

3.5 FOG and Debris Discharge Limitations [WDR D.13(iii)(d)]

The City limits the discharge of fats, oils, and grease and other debris that may cause blockages through the City Municipal Code Sections identified below and included in the identified appendices.



Table 3-3: FOG and Debris Limitations

| Municipal Code Section | SSMP Element 3 Appendix |
|---|--------------------------------|
| 14.24.030 – Specific discharge prohibitions. | 3C |
| 14.24.040 – Interceptors—Required. | 3F |
| 14.24.050 – Grease interceptors and gravity separating devices. | 3G |

3.6 Enforcement [WDR D.13(iii)(e)]

The City enforces violations of its sewer ordinances through the legal authorities provided in the City Municipal Code Sections identified below and included in the identified appendices.

Table 3-4: Enforcement Legal Authority

| Municipal Code Section | SSMP Element 3 Appendix |
|---|--------------------------------|
| 14.08.015 – Excessive sewer maintenance expense. | 3H |
| 14.08.016 – Damage to city’s municipal wastewater system—creation of other liability. | 3I |
| 14.24.100 – Control of Wastewater Discharges | 3J |
| 14.52.020 – Powers and authorities of inspectors. | 3K |
| 14.72.010 – Consent orders. | 3L |
| 14.72.020 – Order to show cause. | 3L |
| 14.72.030 – Administrative compliance orders. | 3L |
| 14.72.040 – Cease and desist orders. | 3L |
| 14.72.050 – Administrative fines. | 3L |
| 14.72.060 – Emergency suspensions. | 3L |
| 14.72.070 – Termination of discharge. | 3L |
| 14.72.080 – Appeals. | 3L |
| 14.72.090 – Injunctive relief. | 3L |
| 14.76.010 – Civil penalties. | 3M |
| 14.76.020 – Criminal prosecution. | 3M |
| 14.76.030 – Remedies nonexclusive. | 3M |

ELEMENT 4 - OPERATION AND MAINTENANCE PROGRAM

The City's operation and maintenance of its collection system ensures that the system is kept in good working condition. Sewer lift station maintenance work is contracted to and performed by Fluid Resource Management (FRM), and sewer lift station operations and sewer line operations and maintenance is primarily conducted by City of Buellton Staff. This SSMP Element outlines the work that is conducted to accomplish the optimal operation and maintenance of the City's collection system.

4.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(iv) states:

The SSMP must include those elements listed below, which 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. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;
- (c) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;
- (d) Provide training on a regular basis for Staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
- (e) Provide equipment and replacement part inventories, including identification of critical replacement parts.

4.2 Collection System Map [WDR D. 13(iv)(a)]

The sewer collection system consists of approximately twenty (20) miles of pipelines and is predominantly clay pipe. The majority of the sewer collection system consists of gravity pipelines, which vary in size from six (6) to fifteen (15) inches in diameter, and there is approximately 850 feet of force mains. Table 4-1 illustrates the age of the sewer lines by identifying the years during which the associated percentages of the sewer system were constructed.

Table 4-1: Age of Sewer Lines

| Year Sewer Constructed | Percent of Sewer System |
|-------------------------------|--------------------------------|
| 2000 to Present | 27% |
| 1980 to 1999 | 23% |
| 1960 to 1979 | 50% |

There are two (2) public sewer lift stations located in the City's service area, which are operated by City Staff and maintained through contracted services provided by FRM as described in the contract included in Appendix 4A. The force main immediately downstream of the Riverview Park lift station is owned and maintained by the City. The newly acquired lift station which services the Zaca Creek Golf Course discharges to a force main which is not owned or operated by the City. The force main associated with the Zaca Creek Golf Course Lift Station is owned and maintained by the Rancho de Maria Home Owners Association. Public lift station locations and associated force mains are referenced in Figure 4-1 below.

Maintenance access to the gravity sewers is provided by 379 manholes and a number of structures, such as cleanouts and inspection holes. The collected wastewater is conveyed to the City's wastewater treatment plant for treatment and disposal. Figure 4-1 depicts a general overview of the existing system.

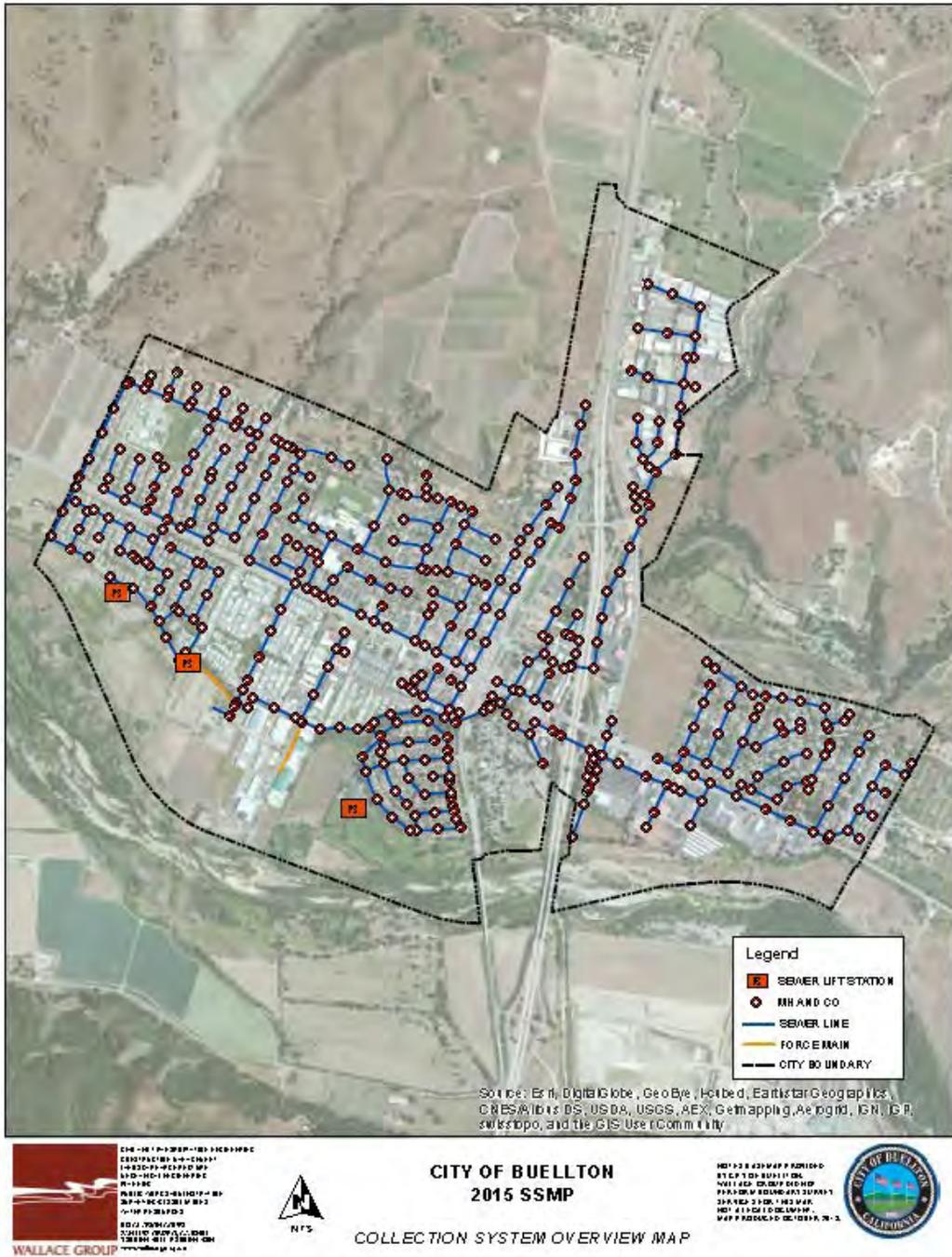


Figure 4-1: Sewer System Overview

The City of Buellton is in the process of completing up-to-date electronic collection system maps created and maintained by MNS Engineers, Inc. using geographic information system (GIS). These maps are overlain onto aerial imagery and provide detailed locations of the system’s components with references to roads, homes, trees, etc. within the City boundary.

In addition to providing general location mapping, the electronic map is updated as changes are made to the City’s collection system to include precise information relating to the general characteristics of the system components. This information includes material composition, pipe diameters, segment lengths, slopes, grade elevations, invert elevations, drain field system, and survey data. The contract for GIS services is included in the General Services Agreement with MNS Engineers, Inc., located in Appendix 4B.

Collection system maps are printed to hard copy and provided to the City’s Staff and contractors for use during routine maintenance and operations and during capital improvement projects. As-built plans and construction drawings are maintained as the system is improved through each capital improvement project. This data will also be routinely integrated back into the collection system GIS as this system is upgraded. The sewer system atlas map used for daily operations is located in Figure 4-2.



Figure 4-2: Sewer System Atlas

GIS and atlas system maps also include storm drain locations throughout the City. The system atlas map for storm water is depicted in Figure 4-3 below.



Figure 4-3: City Storm Drain System

4.3 Preventative Maintenance Program [WDR D.13(iv)(b)]

The City's manhole inspection, sewer line inspection, and cleaning program are all integral components of preventative maintenance. The City addresses non routine work requests with the use of work order forms. These maintenance tasks are performed individually and tracked in the City's Work Order Log.

4.3.1 CCTV Inspection

Closed circuit television (CCTV) inspections are planned to be performed by contracted services with administration and analysis by Public Works Staff. The City plans to conduct system-wide CCTV inspection of the collection system beginning in June 2015. This work will be performed as part of the sewer line cleaning contract planned for this timeframe. Assessment of these inspections will enable the City to develop a capital improvement plan in which sewer lines are rehabilitated or replaced in future years. Approximately 6.5 miles of sewer lines are scheduled to have CCTV inspections in 2015 with the additional 13 miles being completed between 2016 and 2017. A schedule for additional follow up CCTV work will be developed by the end of 2017 if it is determined, based on the results of the aforementioned work, that additional inspection and analysis is required.

4.3.2 Cleaning

The City's sewer cleaning plan for 2015 and subsequent years is to clean the entire gravity collection system every three years and to inspect problematic sewer lines, which also called high maintenance areas (HMAs) or "hot spots", on a weekly basis with physical cleaning occurring based on Staff's assessment of the internal condition of these lines. Sewer line assessments will be based on historic sewer cleaning logs, Staff's visual observations in the field, potential trouble areas reported by pretreatment inspectors, and future CCTV inspections. Sewer line cleaning will be segmented by sewer cleaning area. Sewer Cleaning Area Maps are provided in Appendix 4L and illustrate the three (3) cleaning areas the City identified in its sanitary sewer system.

The City maintains adequate staffing and funding to accomplish annual cleaning objectives with the assistance of contracted sewer line cleaning services, which will be the primary mechanism to achieve system-wide cleaning objectives. The contract for these services will be provided in Appendix 4C once executed at the end of June 2015.

City Staff currently inspects sewer HMAs on a weekly basis and cleans these areas based on weekly observed conditions. Sewer cleaning work history is tracked in the City's Sewer Line Cleaning and Routine Manhole Inspection Log. The City's Sewer Line Cleaning and Routine Manhole Inspection Log is also populated by Staff during cleaning activities. Staff notes the physical attributes of the line being maintained, logs the results of observed cleaning results, and makes recommendations for future maintenance activities for the section of line being cleaned based on inspection findings. The City's Sewer Line Cleaning and Routine Manhole Inspection Log is then used as a work history record and to create future cleaning schedules. The following line cleaning documents are provided in Appendix 4D:

- Sewer System Hot Spot Cleaning List
- Log of Streets—Lines Cleaned
- Sewer Line Cleaning and Routine Manhole Inspection Log

4.3.3 Visual Inspection

Approximately forty percent of the City's manholes are less than fifteen years old. Visual manhole inspections are currently conducted during sewer line cleaning activities. Beginning in 2015, manhole inspections are planned to be incorporated into the sewer line cleaning and CCTV inspection contract. Manhole inspections will be divided into two categories:

- Annual Inspections:
 - Monitor flow and any items of concern that may be routinely observed during line cleaning and CCTV inspections.
 - Observations are logged in the sewer line cleaning log as warranted.
- 5-Year Inspections:
 - Detailed inspections conducted every 5 years.
 - Monitor physical location and characteristics, structural condition, and hydraulic conditions.
 - Performed in conjunction with sewer model updates.
 - Results documented on a Manhole Observation and Inspection Report, which is used by engineering staff to rank the condition of City manholes and develop manhole rehabilitation and replacement plans. The Manhole Observation and Inspection Report is provided in Appendix 4E.

The City maintains adequate staffing and budget to accomplish manhole inspections during each inspection cycle.

4.3.4 High Maintenance Areas

The City has historically maintained twelve HMAs throughout the system, which are cleaned at varying intervals based on Staff's weekly inspections of these areas. These HMAs are generally the result of two contributing factors in the City's sewer system: fats, oils, and grease (FOG) and root intrusion. An overview of these twelve HMAs is found in Figure 4-4.

The HMA map included as Figure 4-4 is updated when Staff observes sewer line conditions that require an increased cleaning frequency. Future sewer line rehabilitation and replacement projects may allow Staff to modify and reclassify cleaning schedules based on the internal condition of these lines.



Figure 4-4: HMAs

4.3.5 Lift Station Operation and Maintenance

There are two public lift stations located in the City's service area: River View Park Lift Station and Zaca Creek Golf Course Lift Station. These lift stations are provided with duplex pumping systems for redundancy and reliability. These duplex systems allow for continued operation of a lift station in the event of pump failure.

Routine, weekly lift station operation and maintenance activities are performed by City Staff. FRM is contracted by the City for quarterly and emergency lift station maintenance. Lift stations are inspected by City Staff on a weekly basis. Inspections consist of logging weekly pump run

times and performing a general inspection of major critical components of the station, such as pump operation, station controls, alarms, and one emergency backup generator, which is located at the wastewater treatment plant.

The Riverview Park lift station is equipped to operate under emergency conditions, such as a power outage utilizing an emergency backup generator. The Zaca Creek Golf Course lift station, is not equipped with a power cord to connect to an emergency power supply. The City has access to a rented trailer-mounted generator in the event emergency power is necessary. Due to the limited flow these lift stations receives from River View Park and the Golf Course, the City closes these park restrooms during an extended power failure since they are the only flow contributions to these lift stations.

When routine or minor maintenance is required, it is documented on Weekly Lift Station Logs. An example Weekly Lift Station Log is included in Appendix 4F. Major maintenance tasks, such as emergency maintenance, significant system adjustments, repairs, and replacements, are completed by outside contractors. A record of these maintenance activities and repairs is maintained in the City's Work Order Log.

The City's contractor for lift station maintenance, FRM, provides a quarterly preventative maintenance schedule to help ensure pump station components are running and maintained based on industry and manufacturers recommendations. Work Orders for quarterly inspections and maintenance are maintained by the City in their database. Examples of FRM Quarter Reports are provided in Appendix 4G.

4.4 Rehabilitation and Replacement Plan [WDR D.13(iv)(c)]

As sewer collection systems age, the risk for deterioration, blockages, and collapse increases considerably. In an effort to mitigate those risks, the City is planning to conduct several investigative efforts and analyses to ensure sewer system assets are assessed and replaced when necessary.

The City plans to complete engineering reviews and assessments on the information obtained from an update to their 2006 Citywide Sewer Study, which is planned to be conducted in fiscal year 2016/2017, and will also include CCTV inspections and manhole inspections. This information will give the City the necessary information to identify and prioritize system deficiencies. Short- and long-term rehabilitation actions will be implemented after review of this data to address each deficiency. These services are provided under the General Services Agreement with MNS Engineering, Inc. as previously referred to and included in Appendix 4B.

Short- and long-term rehabilitation actions are funded through the City's sewer enterprise fund and capital budget. Capital projects and annual operating budgets are funded by wastewater user fees. Long-term rehabilitation actions will be incorporated into upcoming fiscal year budgets as capital improvement projects. Work for short- and long-term projects, such as manhole rehabilitation or replacement and sewer spot repairs are performed by area contractors through publicly bid service contracts awarded by the City.

The City has recently completed one near-term project, the replacement of approximately 100 linear feet of cast iron sewer line in Section 300-13 of the City's sewer system. Additional sewer improvement projects are included in the fiscal year 2014/2015 Operating and Capital Budget. The "Budget at a Glance" – Operating/CIP Budgets for fiscal year 2014/2015 are included in

Appendix 4H. Future funding and identification of long term capital projects beyond this fiscal year will be provided through an Operations Cost and Rate Analysis conducted in 2014/2015, which will be described and included or referenced in this SSMP Element upon its completion.

The City plans to conduct system-wide CCTV inspection of the collection system beginning in 2015. This work will be performed as part of the sewer line cleaning contract previously mentioned in Section 4.3.2: Cleaning. Assessment of these inspections will enable the City to develop a capital improvement plan in which sewer lines are rehabilitated or replaced in future years. Approximately 6.5 miles of sewer lines are scheduled to have CCTV inspections in 2015 with the additional 13 miles being completed between 2016 and 2017.

4.5 Training [WDR D.13(iv)(d)]

Training programs include formal classroom training and on-the-job training. Training is facilitated by both City Staff and outside training workshops. On-the-job cross training is pursued to ensure Staff has a proficient working knowledge of the sanitary sewer system and that critical tasks can be performed without interruption. Task proficiency is a requirement for all job positions and promotions. Staff job descriptions are located in Appendix 4I. Training records are maintained by the Public Works Director/City Engineer in a Staff Training Log, which is included in Appendix 4J.

Operations and Maintenance Staff are initially trained in the proper operation and maintenance of all new major mobile equipment and facilities by the respective contractor or manufacturer. Written operation and maintenance manuals are used as resource material for start-up training and new Staff training.

The City has recently developed Standard Operating Procedures for the operation and maintenance of the sewer collection and conveyance system. These procedures which are identified below are planned to be implemented by July 2015. A record of annual training will be kept on file at the Public Works Office.

Operation and Maintenance Procedures

- Preventative Maintenance Program
- Lift Station Operation and Maintenance
- Annual Sewer Collection System Cleaning and High Maintenance Area Cleaning and Reporting
- Annual Map & GIS Updates
- Underground Service Alert (USA) Marking
- Fats, Oils, and Grease (FOG) Control Program
- Routine Traffic and Crowd Control
- Sewer Connection Requests
- Collection System Training Requirements

These Procedures are located in Appendix 4M.

Safety training is an integral aspect of the City's program. Every Staff member receives formal safety training. This training consists of confined space training, traffic control, safety equipment, distracted driving, CPR/First Aid, etc. Safety training records are also included in the Staff Training Log in Appendix 4J. Annual training on operation and maintenance activities and

SSMP Element 4 – Operation and Maintenance Program will be conducted with City Staff. Training will be documented and tracked in the City's Staff Training Log.

Contractors implementing portions of this Operation and Maintenance Program are required to be appropriately trained on the activities they are completing through their contracts with the City and their licensing.

4.5.1 Staffing

The City currently staffs its Wastewater Department with two full-time employees and one floating position. These employees are also assisted by two additional Staff members from the Water Department, who are also trained in the operation and maintenance of the sewer collection and conveyance system. As previously mentioned, a portion of wastewater operation and maintenance activities are covered by contract staff. Currently contractors are used for lift station maintenance and contract services are planned to be conducted for sewer line cleaning, manhole inspections, and CCTV inspection in 2015.

4.6 Equipment and Replacement Parts Inventory [WDR D.13(iv)(e)]

Equipment and replacement parts inventories are divided into two categories: sewer lift stations and sewer lines and appurtenances.

4.6.1 Sewer Lift Stations

The City does not perform significant maintenance activities for the two public lift stations in the collection system. Contract services are used for quarterly and emergency lift station maintenance and are currently relied upon for an inventory of critical parts.

4.6.2 Sewer Lines and Appurtenances

Critical parts and equipment, such as tools, pipe, hydro vac parts, and portable pumps, are tracked through the City's Inventory List, which is included in Appendix 4K. The City will update this list to account for new parts and equipment as they are purchased and to account for parts and materials used in the sewer collection and conveyance system by the end of 2014.

In the event of an emergency, local retailers are available to supply additional needed equipment and parts on short notice. Valley Tool is recognized in the Santa Ynez Valley as the largest distributor of rental equipment and tools, and Todd Pipe and Supply is the largest distributor of plumbing and building products. Both of these vendors are located within the City limits. Contact information for the retailer's location is provided below:

- Valley Tool Rentals
870 McMurray Road
(805) 688-7213
- Todd Pipe and Supply
820 McMurray Road
(805) 688-3960

Additional equipment and emergency support can also be provided by Fluid Resource Management, Stewarts De-Rooting & Plumbing and the City of Solvang Public Works Department who are available for emergency call-out services.

ELEMENT 5 - DESIGN AND PERFORMANCE PROVISIONS

The standards and specifications for new construction and repair of the existing sanitary sewer system described in this SSMP Element are utilized to ensure a high quality, well designed, and functioning sanitary sewer system.

5.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(v) states that the SSMP must identify:

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

5.2 Design and Construction Standards and Specifications [WDR D.13(v)(a)]

The City of Buellton contracts design services to MNS Engineers, Inc. as described in the contract provided in Appendix 5A. The following details from the City of Buellton Department of Public Works Standard Details are utilized for work completed on the sanitary sewer system and are included in Appendix 5B:

- 519: Modification of Sewer Lateral Over Water Main
- 601: Sanitary Sewer Standards and Symbols
- 602: Sanitary Sewer Manhole
- 603: Sanitary Sewer Drop Manhole
- 604: Shallow Sanitary Sewer Manhole
- 605: Sanitary Sewer Cleanout
- 606: Sanitary Sewer Service Lateral
- 607: Sanitary Sewer Trench
- 608: Stainless Steel Manhole Step

The *Greenbook: Standard Specifications for Public Works Construction* is also utilized by the City through references to Sections and Subsections of the *Greenbook* in the City of Buellton Department of Public Works Standard Details.

The State of California Department of Health Services' *Guidance Memo No. 2003-02: Guidance for the Separation of Water Mains and Non-potable Pipelines* is utilized to regulate the separation of water and sewer lines and is included in Appendix 5C.

Design and construction provisions are also given in the following City Municipal Code Sections from City Municipal Code Chapters 14.16: Building Sewers, Lateral Sewers and Connections and 14.20: Public Sewer Construction, which are included in Appendix 5D and Appendix 5E, respectively, as identified below:

Table 5-1: Design and Performance Provisions

| Municipal Code Section | SSMP Element 5 Appendix |
|--|--------------------------------|
| 14.16.010 – Permit—Required. | 5D |
| 14.16.020 – Construction requirements. | 5D |
| 14.16.030 – Sewer materials. | 5D |
| 14.16.040 – Minimum size and slope. | 5D |
| 14.16.050 – Building drain. | 5D |
| 14.16.060 – Joints and connections. | 5D |
| 14.16.070 – Connection to public sewer. | 5D |
| 14.16.080 – Separate sewers. | 5D |
| 14.16.090 – Old building sewers. | 5D |
| 14.16.100 – Sewer too low. | 5D |
| 14.16.110 – Protection of excavation. | 5D |
| 14.16.120 – Maintenance of side sewer. | 5D |
| 14.16.130 – Backflow protection device. | 5D |
| 14.20.010 – Permit—Required. | 5E |
| 14.20.020 – Plans—Profiles and specifications—Required. | 5E |
| 14.20.030 – Subdivisions. | 5E |
| 14.20.040 – Easement or right-of-way. | 5E |
| 14.20.050 – Persons authorized to perform work. | 5E |
| 14.20.060 – Grade stakes | 5E |
| 14.20.070 – Compliance with local regulations. | 5E |
| 14.20.080 – Protection of excavation. | 5E |
| 14.20.090 – Compliance with occupational safety and health acts. | 5E |
| 14.20.100 – Design and construction standards. | 5E |



5.3 Inspection and Testing Procedures and Standards [WDR D.13(v)(b)]

The City's contract with MNS Engineers, Inc., which is referenced in Section 5.2 Design and Construction Standards and Specifications [WDR D.13(v)(a)] and included in Appendix 5A, includes inspection services.

Inspection and testing requirements for sanitary sewer system components are followed as described by the current version of the *Greenbook: Standard Specifications for Public Works Construction* and include activities, such as closed-circuit television inspection and air-pressure and mandrel testing of gravity sewer mains. Inspection and testing procedures and standards are also typically included in project specifications.

ELEMENT 6 - OVERFLOW EMERGENCY RESPONSE PLAN

The Overflow Emergency Response Plan (OERP) is summarized in this SSMP Element and provided in its entirety with the associated Emergency Operating Procedures (EOPs), which will be completed by June 2015, in Appendix 6A. The OERP addresses issues such as SSO response, detection, mitigation, clean up, investigation, documentation, and reporting.

6.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(vi) states:

Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, the 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 appropriate response to all overflows;
- (c). Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification;
- (d). Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the OERP and are appropriately trained;
- (e). Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (f). A program to ensure that all reasonable steps are taken to contain untreated wastewater and prevent discharge of untreated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

6.2 Initial SSO Notification Procedures [WDR D.13(vi)(a)]

If a member from the public witnesses a SSO, they either contact the City of Buellton City Hall at (805) 688-5177 or dial 9-1-1.

6.2.1 The City Public Works Department as the First Responder

If City Hall is contacted during normal business hours, which are 8:00 AM – 5:00 PM Monday through Friday excluding 12:00 PM – 1:00 PM daily and legal holidays, administrative staff calls Rose Hess, Public Works Director/City Engineer, who determines who should respond to the SSO. Rose contacts City Staff in the order and with the contact information provided in Appendix 6A, SS-EOP-02: SSO Notification, Attachment 2 to investigate the situation and

documents the caller's information and the details of the SSO, such as date, time, and SSO location. If City Staff needs assistance responding to the SSO, the first responder calls one of the emergency support contacts identified in Table 6-1, which have agreed to assist the City in the event of an emergency if they are available when called:

Table 6-1: Emergency Support Contacts

| Company or Agency Name | Contact Name | Phone Number |
|---|---|----------------|
| Stewart's De-Rooting & Plumbing <i>Subsidiary of County Sanitation Company, Inc.</i> | Dispatch | (805) 688-5513 |
| City of Solvang Public Works Department | Nathan Giacinto <i>Wastewater Supervisor</i> | (805) 688-5575 |
| Fluid Resource Management | Mike Ellison <i>Operator</i> | (805) 597-7100 |

The City is also part of two mutual aid agreements, the California Disaster and Civil Defense Master Mutual Aid Agreement and the Public Works Mutual Aid Agreement, which are included in Resolution No. R92-41 and 08-24, respectively, in Appendix 6B.

The first responder also calls Rose Hess, Public Works Director/City Engineer, at [REDACTED] to notify her when the SSO has been contained and mitigated. Rose Hess, Public Works Director/City Engineer, also calls the City Manager, Marc Bierdzinski, at [REDACTED] to inform him of the SSO.

If City Hall is contacted after normal business hours, between 12:00 PM and 1:00 PM, on a holiday, or during the weekend, the call is forwarded to Echo Communications, a contracted answering service. Echo Communications Staff documents the caller's name, phone number, and address and calls the City on-call Staff person to inform them of the SSO notification. The City on-call Staff then contacts the informant to determine and document the logistics of the SSO, such as the location, approximate start time, and extent of the spill, and documents this information. The Staff on-call rotation order will be provided in the Public Works Call List provided in Appendix 6A, SS-EOP-02: SSO Notification, Attachment 2.

The on-call Staff person will be the first responder and will contact City Public Works Staff for assistance if needed in the order and with the contact information provided in Appendix 6A, SS-EOP-02: SSO Notification. If City Staff needs assistance responding to the SSO, the first responder calls the one of the emergency support contacts identified in Table 6-1, which has agreed to assist the City in the event of an emergency if they are available when called.

The first responder also calls Rose Hess, Public Works Director/City Engineer, at [REDACTED] to notify her of the SSO. Rose Hess, Public Works Director/City Engineer, also calls the City Manager, Marc Bierdzinski, at [REDACTED] to inform him of the SSO.

If City Staff is not able to contact Rose Hess, Public Works Director/City Engineer, in the event of a SSO, Marc Bierdzinski, City Manager, is contacted and is responsible for coordinating the

SSO response and notifying the appropriate City Staff for SSO response and regulatory agencies for SSO notification.

6.2.2 Emergency Services as the First Responder

If 9-1-1 is called to report a SSO, the Santa Barbara County Sheriff Department contacts City Hall at (805) 688-5177 as outlined in Appendix 6A, SS-EOP-02: SSO Notification.

If the SSO occurs after hours, the Santa Barbara County Sheriff Department contacts the on-call Staff person with the contact information that will be provided in Appendix 6A, SS-EOP-02: SSO Notification, Attachment 2 by June 2015. The on-call Staff person will be the first responder and will contact City Public Works Staff for assistance if needed in the order and with the contact information provided in Appendix 6A, SS-EOP-02: SSO Notification.

If City Staff needs assistance responding to the SSO, the first responder calls one of the emergency support contacts identified in Table 6-1, which has agreed to assist the City in the event of an emergency if they are available when called. The first responder also calls Rose Hess, Public Works Director/City Engineer, at [REDACTED] to notify her of the SSO. Rose Hess, Public Works Director/City Engineer, also calls the City Manager, Marc Bierdzinski, at [REDACTED] to inform him of the SSO.

If City Staff is not able to contact Rose Hess, Public Works Director/City Engineer, in the event of a SSO, Marc Bierdzinski, City Manager, is contacted and is responsible for coordinating the SSO response and notifying the appropriate City Staff for SSO response and regulatory agencies for SSO notification.

6.2.3 Initial Regulatory Notification

The City ensures regulatory agencies are informed of all SSOs in a timely manner through the SSO Notification Procedure provided in Section 6.4: SSO Notification and Reporting Procedures of this SSMP Element.

6.3 SSO Response Program [WDR D.13(vi)(b)]

The SSO Response Program is comprised of the procedures and programs discussed in this Element and the following EOPs, provided in Appendix 6A:

- SS-EOP-01: Overflow Emergency Response Plan
- SS-EOP-02: SSO Notification
- SS-EOP-03: SSO Reporting
- SS-EOP-04: SSO Traffic and Crowd Control
- SS-EOP-05: SSO Volume Estimation
- SS-EOP-06: SSO Mitigation and Cleanup
- SS-EOP-07: Water Quality Monitoring
- SS-EOP-08: Surface Water Closure
- SS-EOP-09: SSO Response Documentation and Records
- SS-EOP-10: SSO Training Requirements

The City's Public Works Administrative Office is open and can receive notifications of SSOs from 8:00 AM to 5:00 PM, Monday through Friday, excluding 12:00 PM to 1:00 PM daily and legal holidays. After hours, on weekends, and on holidays, the City utilizes an Answering Service to initiate City Public Works Staff SSO notification efforts, and City Staff responses to SSOs.

Figure 6-1 illustrates the chain of command, which must be observed and followed when a SSO occurs:

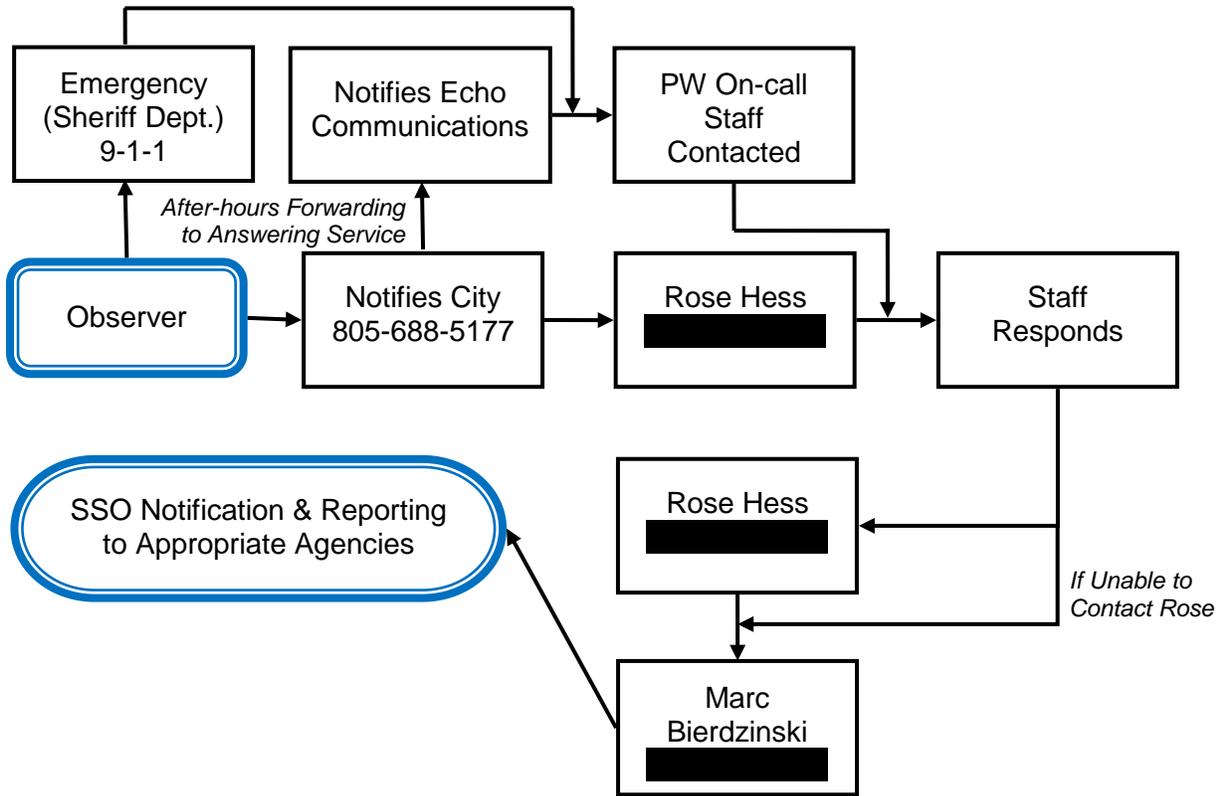


Figure 6-1: SSO Response Chain of Command

The details of City Staff’s response to SSOs, which is identified in the chain of command, are provided in the EOPs included in Appendix 6A.

6.4 SSO Notification and Reporting Procedures [WDR D.13(vi)(c)]

This section of the OERP ensures proper notification and reporting of SSOs, which occur in the City of Buellton’s sanitary sewer collection system, in order to protect public and environmental health. The SSO Notification and Reporting Procedures, SS-EOP-02 and SS-EOP-03, respectively, are outlined below and are provided in their entireties in Appendix 6A.

An overview of the notification and reporting process is also illustrated on the following page in Figure 6-1. This overview is not inclusive of all of the notification and reporting requirements and procedures. The section of this SSMP Element corresponding to each SSO category for notifications and reporting must be referenced, and the SSO Notification and Reporting Procedures, SS-EOP-02 and SS-EOP-03, respectively, must be followed upon their completion.

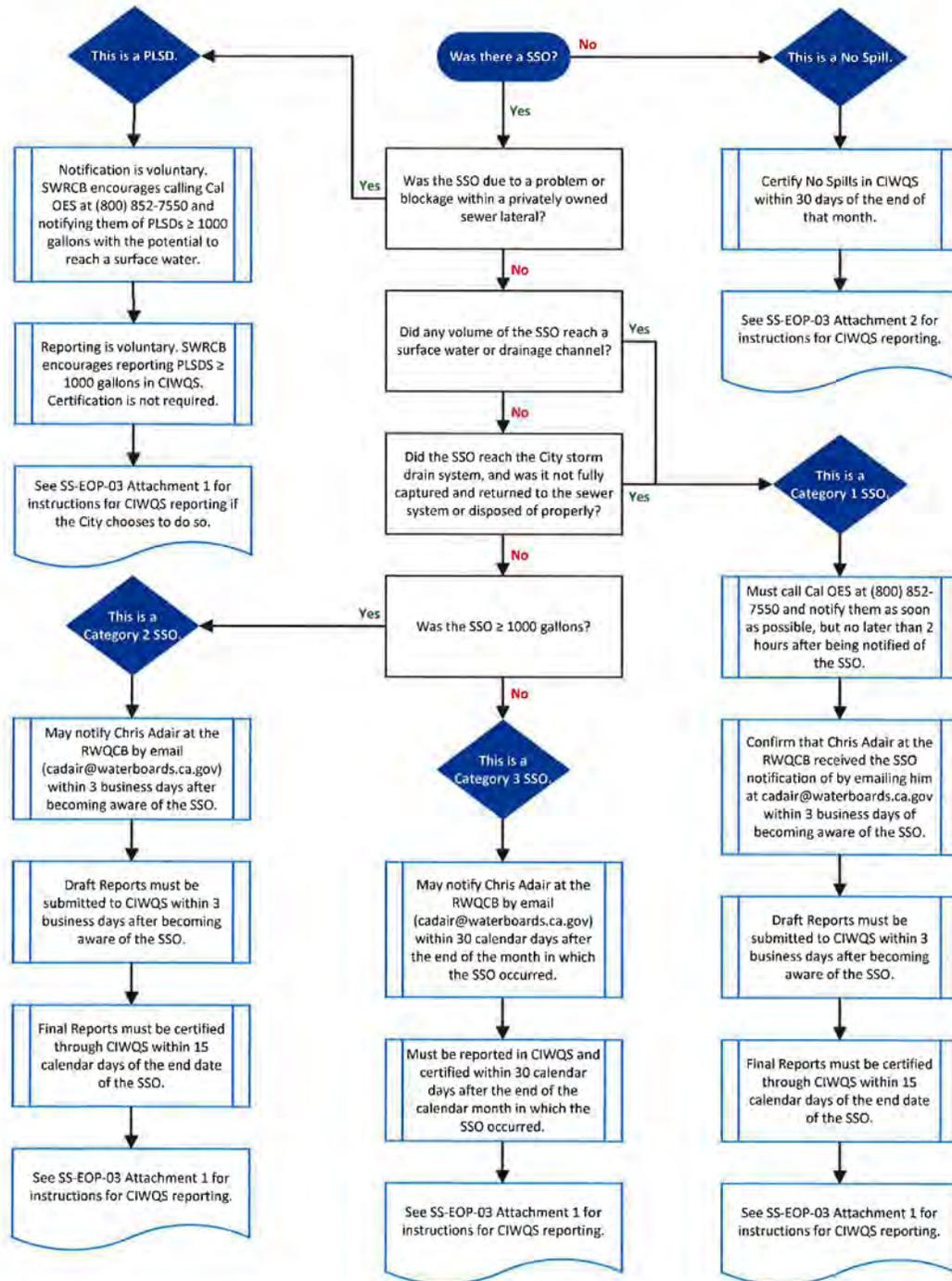


Figure 6-2: SSO Notification and Reporting Overview

6.4.1 SSO Notification Procedure

SSO notification procedures vary based on whether the SSO is classified as a Category 1, Category 2, Category 3, or PLSD. After notifying the RWQCB of any SSO, Rose Hess should email RWQCB Staff, Chris Adair at cadair@waterboards.ca.gov to confirm that the report was submitted and received.

6.4.1.1 *Category 1 SSOs*

For any discharges of sewage **greater than or equal to 1,000 gallons** that result in a **discharge to** a drainage channel or **a surface water** or to the City storm drain system and is not fully captured and returned to the sewer system or disposed of properly, the City shall, as soon as possible, but no later than **two (2) hours** after becoming aware of the discharge, notify the California Governor's Office of Emergency Services (Cal OES) at 1-800-852-7550.

6.4.1.2 *Category 2 SSOs*

For a SSO **1,000 gallons or greater** in volume that **does not discharge to** a drainage channel or **surface water**, Rose Hess may email RWQCB Staff, Chis Adair, at cadair@waterboards.ca.gov to notify him of the SSO **within 3 business days** after becoming aware of the SSO.

6.4.1.3 *Category 3 SSOs*

If a SSO occurs due to a problem in the City's sanitary sewer collection system and does not reach a drainage channel, surface water, the City storm drain system, or is fully captured from the City's storm drain system and returned to the sewer system or disposed of properly and is **less than 1000 gallons** in volume, Rose Hess may email RWQCB Staff, Chis Adair, at cadair@waterboards.ca.gov to notify him of the SSO **within 30 calendar days** after the end of the calendar month in which the SSO occurred.

6.4.1.4 *PLSDs*

The City may voluntarily notify regulatory agencies, such as the RWQCB, of a private lateral sewage discharge (PLSD). SWRCB encourages notifying Cal OES of a PLSD if the PLSD is greater than or equal to 1,000 gallons with the potential to reach a surface water.

SWRCB also encourages notifying the appropriate regulatory agencies or notifying the responsible party that notification and reporting should be completed as required by Health and Safety Code Section 5410 et. seq. and Water Code Section 13271 if the PLSD is greater than or equal to 1,000 gallons regardless of the SSO destination.

6.4.2 SSO Reporting Procedure

SSO reporting procedures vary based on whether the SSO is classified as a Category 1, Category 2, Category 3, or PLSD.

6.4.2.1 *Category 1 SSOs*

Draft reports for Category 1 SSOs shall be submitted in CIWQS within three (3) business days of the City becoming aware of the SSO. Final reports for Category 1 SSOs shall be certified in CIWQS within fifteen (15) calendar days of the end date of the SSO. If CIWQS is not available for the submission of the Draft or Final SSO report, the required information must be faxed to RWQCB at (805) 543-0397.

The details of Category 1 SSO reports and their content and how to complete and submit the report in CIWQS is included as an attachment to SS-EOP-03: SSO Reporting, provided in Appendix 6A.

For all Category 1 SSOs greater than or equal to 50,000 gallons, the City must also submit a Technical Report within 45 calendar days of the end date of the SSO. The Technical Report must include the information described in SS-EOP-03: SSO Reporting, provided in Appendix 6A. The required information is outlined below and includes descriptions, diagrams, other documents and information, which outline the causes and circumstances of the SSO, the City's response to the SSO, and the water quality monitoring performed to evaluate the impact of the SSO:

- Causes and Circumstances of the SSO:
 1. Complete and detailed explanation of how and when the SSO was discovered.
 2. Diagram showing the SSO failure point, appearance point(s), and final destination(s).
 3. Detailed description of the methodology employed and available data used to calculate the volume of the SSO and, if applicable, the SSO volume recovered.
 4. Detailed description of the cause(s) of the SSO.
 5. Copies of original field crew records used to document the SSO.
 6. Historical maintenance records for the failure location.
- Enrollee's Response to SSO:
 1. Chronological narrative description of all actions taken by enrollee to terminate the spill.
 2. Explanation of how the SSMP Overflow Emergency Response Plan was implemented to respond to and mitigate the SSO.
 3. Final corrective action(s) completed and/or planned to be completed, including a schedule for actions not yet completed.
- Water Quality Monitoring:
 1. Description of all water quality sampling activities conducted including analytical results and evaluation of the results.
 2. Detailed location map illustrating all water quality sampling points.

6.4.2.2 *Category 2 SSOs*

Draft reports for Category 2 SSOs shall be submitted in CIWQS within three (3) business days of the City becoming aware of the SSO. Final reports for Category 2 SSOs shall be certified in CIWQS within fifteen (15) calendar days of the end date of the SSO. If CIWQS is not available for the submission of the Draft or Final SSO report, the required information must be faxed to RWQCB at (805) 543-0397.

The details of Category 2 SSO reports and their content and how to complete and submit the report in CIWQS is included as an attachment to SS-EOP-03: SSO Reporting, provided in Appendix 6A.

6.4.2.3 *Category 3 SSOs*

Report and certify all Category 3 SSOs in CIWQS within thirty (30) calendar days after the end of the calendar month in which the SSO occurs. If CIWQS is not available, the required information must be faxed to RWQCB at (805) 543-0397.

The details of this report and its content and how to complete and submit the report in CIWQS is included as an attachment to SS-EOP-03: SSO Reporting, provided in Appendix 6A.

6.4.2.4 *PLSDs*

PLSDs may be voluntarily reported in CIWQS. SWRCB encourages reporting a PLSD in CIWQS or notifying the responsible party that notification and reporting should be completed as required by Health and Safety Code Section 5410 et. seq. and Water Code Section 13271 if the PLSD is greater than or equal to 1,000 gallons regardless of the SSO destination.

If a PLSD is reported in CIWQS, the City must identify the SSO as occurring and caused by a private lateral, and a responsible party, who is not the City, should be identified, if known. Certification of PLSD reports is not required.

6.4.2.5 *No Spill Certification*

If there are no SSOs during a calendar month, the City must certify a “No Spill” certification in CIWQS within thirty (30) calendar days after the end the calendar month in which no SSO occurred. If CIWQS is not available, the required information must be faxed to RWQCB at (805) 543-0397.

If there are no SSOs during a calendar month, but the City reported a PLSD, the City shall certify a “No Spill” certification statement for that month.

6.4.2.6 *Amended SSO Reports*

If the City wishes to update or add additional information to a certified SSO Report, the City must complete this update or addition by amending the SSO report or adding an attachment to the SSO report in CIWQS within 120 calendar days after the SSO end date.

If a SSO report needs to be amended after this 120 calendar day deadline, the City may contact the SSO Program Manager, Victor Lopez, at Victor.Lopez@waterboards.ca.gov and request to amend the SSO report. The City is required to submit justification for why the additional information was not available prior to the end of the 120 calendar day deadline with this request.

6.5 OERP Training [WDR D.13(vi)(d)]

The City will develop a formal training program by July 2015, which will include annual training of City Staff on this SSMP Element and its Appendices. The City will also require contractor personnel to annually train on and follow this SSMP Element and its Appendices through their contracts. The City will revise this section of this SSMP Element upon the initiation of this training program and maintain a log of OERP Training in this Element as training is completed.

SS-EOP-09: SSO Training Requirements also provides an outline of the City's training program in respect to SSO response and mitigation included in Appendix 6A.

6.6 Emergency Operations Procedures [WDR D.13(vi)(e)]

The City of Buellton utilizes the 2012 12th Edition of the Work Area Traffic Control Handbook (WATCH) for traffic control, as identified in SS-EOP-04: SSO Traffic and Crowd Control, provided in Appendix 6A.

The City is responsible for providing crowd control and contacts the Santa Barbara County Sherriff Department for assistance if it is necessary, as identified in SS-EOP-04: SSO Traffic and Crowd Control, provided in Appendix 6A.

6.7 SSO Impact Mitigation Program [WDR D.13(vi)(f)]

The SSO Mitigation Program is comprised of the mitigation practices contained in SS-EOP-09: SSO Impact Mitigation, provided in Appendix 6A.

As is addressed in SS-EOP-06: Water Quality Monitoring and SS-EOP-08: Surface Water Closure, City of Buellton Staff posts river or creek warning and closure signs in the event that a SSO reaches one of the surface waters that run through or adjacent to the City and conducts the water quality sampling for the SSO impact assessment.

ELEMENT 7 - FATS, OILS, AND GREASE CONTROL PROGRAM

The City of Buellton has over forty (40) food service establishments (FSEs) within its jurisdiction. The distribution of types of FSEs is graphically portrayed below in Figure 7-1. The City implemented a Fats, Oils, and Grease (FOG) Control Program in 2008. The primary goal of the City FOG Control Program is to decrease the amount of FOG entering the sanitary sewer system to prevent SSOs.

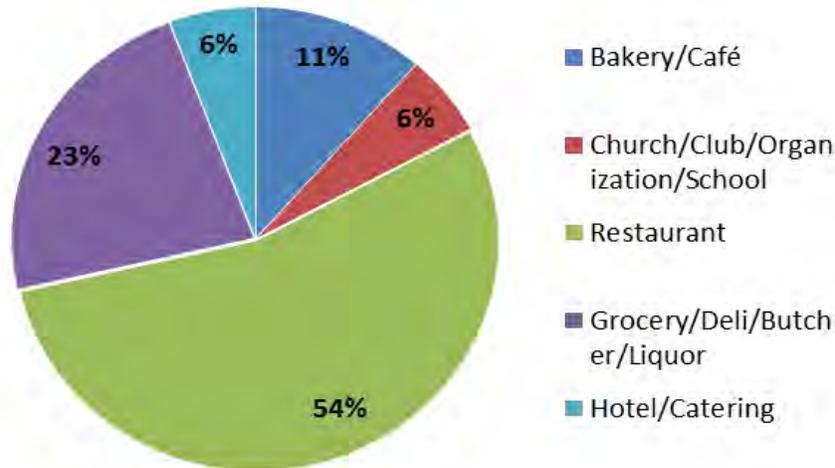


Figure 7-1: Types of Businesses Enrolled in the FOG Control Program in 2015

7.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(vii) states:

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

- (a). An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- (b). A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;
- (c). The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;

- (d). Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- (e). Authority to inspect grease producing facilities, enforcement authorities, and whether the Agency has sufficient staff to inspect and enforce the FOG ordinance;
- (f). An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- (g). Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

7.2 FOG Control Program Public Education and Outreach [WDR D.13(vii)(a)]

7.2.1 FSE Education and Outreach

The City's FOG Control Program began with outreach and education to its FSEs in 2008. Each FSE received a site visit from the City's contractor, Wallace Group, who provided the FSE owner with a:

- FOG Control Program Flyer;
- FOG Best Management Practices (BMP) Booklet;
- Grease Hauler List;
- Cleaning Record Form; and a
- "No Grease" Poster.

FSEs were required to complete a FOG Permit Application and were subsequently issued FOG Permits, which require each FSE to clean/pump their grease control devices (GCDs) at specified frequencies, follow BMPs, and keep records.

FOG Permits are non-transferrable and are re-issued annually after checking for facility changes. FSEs are inspected on a semiannual frequency. FSE compliance is tracked, and FSEs are given thirty (30) days to correct violations.

7.2.2 Residential Education and Outreach

The Buellton Buzz Newsletter, which is distributed to all city water service customers every other month, highlights public works topics, such as appropriate FOG disposal, which provides public education in an economically feasible manner. In addition to this newsletter, the City also distributes Public Service Announcements on similar topics.

An example of a Public Service Announcement advising residents of proper FOG disposal is included in Appendix 7A.

This FOG Program Flyer is also available to City residents at the City office.

7.3 FOG Disposal Facilities [WDR D.13(vii)(b)]

The City does not own or operate a separate FOG disposal facility. The FOG generated within the sanitary sewer system service area that enters the collection system becomes part of the wastewater stream treated at the wastewater treatment plant.

A list of pumping and waste hauling contractors in Santa Barbara County and the surrounding counties that haul FOG to facilities for disposal is available on the California FOG Tri-Technical Advisory Committee Workgroup webpage, www.calfog.org/Hauler.html, is included as Appendix 7B.

7.4 Discharge Prohibition Legal Authority and SSO Prevention Measures [WDR D.13(vii)(c)]

The City of Buellton Municipal Code Chapter 14.24: Use of Public Sewers establishes requirements, which govern the installation, maintenance, and use of grease interception devices for FSEs in the City is provided in its entirety in Appendix 7C.

Table 7-1 summarizes where the City established the legal authorities to prohibit FOG discharges and where measures are identified to prevent SSOs and blockages caused by FOG.

Table 7-1: Discharge Prohibition Legal Authority

| WDR Requirement | Buellton City Municipal Code Section |
|---|--------------------------------------|
| Limit FOG discharges to collection system | 14.24.030(f) |
| Identify measures to prevent SSOs and blockages caused by FOG | 14.24.040 |

7.5 Grease Removal Devices Design, Installation, and Maintenance Requirements [WDR D.13(vii)(d)]

The table below summarizes where the City has adopted the requirement for FSEs to correctly design, install, and maintain grease removal devices.

Table 7-2: Grease Removal Device Design, Installation, and Maintenance Requirements

| WDR Requirement | Buellton City Municipal Code Section |
|---|--------------------------------------|
| FSE to Install Grease Removal Device | 14.24.040(a) |
| Grease Removal Devices – Design Standards | 14.24.040(e) 14.24.050 |
| Grease Removal Devices – Maintenance | 14.24.050 |
| Grease Removal Devices – Best Management Practices (BMPs) | 14.24.050(a) |
| Grease Removal Devices – Record Keeping and Reporting | 14.24.050(e) |



7.6 FOG Control Program Inspection, Enforcement, and Staffing [WDR D.13(vii)(e)]

The City of Buellton’s FOG Control Program inspection and enforcement legal authorities are described in Section 7.6.1 below, and FOG Control Program staffing is described in Section 7.6.2 below.

7.6.1 FOG Control Program Inspection and Enforcement

Table 7-3 summarizes where the City established the legal authorities to inspect grease producing facilities. The City is responsible for enforcement as outlined by City Municipal Code Chapter 14.72: Administrative Enforcement Remedies and Chapter 14.76: Judicial Enforcement Remedies, which are included in their entirety in Appendix 7D.

Table 7-3: FOG Control Program Inspection and Enforcement Legal Authorities

| WDR Requirement | Buellton City Municipal Code Section |
|--|---|
| Authority to inspect grease producing facilities | 14.52.020 14.64.130 |
| Authority to enforce FOG Program Requirements | 14.72 14.76 |

7.6.2 FOG Control Program Staffing

Table 7-4 name the City and contract Staff who manage and implement the City’s FOG Control Program. Appendix 7E includes a copy of the City’s contract with Wallace Group for FOG Control Program Services through June 30, 2015.

Table 7-4: FOG Program Staffing

| Name and Title | FOG Program Responsibilities | Contact Information |
|---|--|--|
| Rose Hess Public Works Director/City Engineer <i>City of Buellton</i> | <ul style="list-style-type: none"> ▪ The Public Works Director is responsible for implementation of the City FOG Program. ▪ Responsible for receiving reports from the FOG control project manager summarizing the results of the biannual and annual inspections. ▪ Implementation of the contract between the City and Contracted FOG inspectors to conduct annual grease trap or interceptor inspection of all commercial properties and public education. | (805) 688-5177 Office E-Mail: roseh@cityofbuellton.com |



| Name and Title | FOG Program Responsibilities | Contact Information |
|--|---|---|
| | <ul style="list-style-type: none"> ▪ Attending non-compliance meetings. ▪ Answering FOG Program questions. | |
| <p>John Sanchez Wastewater Chief Plant Operator <i>City of Buellton</i></p> | <ul style="list-style-type: none"> ▪ The Wastewater Chief Plant Operator is responsible for following the City Municipal Code enforcement process. ▪ Preparing and sending Public Notification Letters. ▪ The Wastewater Chief Plant Operator is responsible for the management of FOG High Maintenance Areas if and when future FOG HMAs are identified. | <p>(805) 331-5369 Work Cell E-Mail: sewer@cityofbuellton.com</p> |
| <p>Bill Callahan FOG Control Program Manger <i>Wallace Group</i></p> | <ul style="list-style-type: none"> ▪ Assisting the City in the design, planning and setup of the FOG Program; ▪ Updates to the FSE Business Location List; ▪ Directing the Environmental Compliance Inspector in conducting initial, annual and compliance re-inspections; ▪ Conducting FSE initial, annual, and compliance re-inspections. ▪ Notifying and resolving the City FOG Program Compliance issues by drafting violation letters, and updating the files for each FSE. ▪ Answering FOG Program questions. | <p>(805) 544-4011 Office E-Mail: BillC@wallacegroup.us</p> |



7.7 Grease Problem Area Identification and Sewer Cleaning [WDR D.13(vii)(f)]

The City's sewer cleaning plan for 2014 and subsequent years is to clean the entire gravity collection system every three years.

The City Chief Plant Operator weekly directs Public Works Fieldworkers in the inspection of problematic sewer lines, which are also called high maintenance areas (HMA). Physical cleaning occurs based on Staff's assessment of the internal condition of these lines as described in Element 4 – Operation and Maintenance Program. The list of eleven (11) HMA, ten (10) of which are HMA due to the presence of FOG and/or roots, is included in Element 4.

Since the inception of the FOG Program in 2008, the City HMAs require cleaning less frequently due to FOG.

7.8 Source Control Measure Development and Implementation [WDR D.13(vii)(g)]

The City uses FSE and residential outreach, education, and the FSE FOG Control Program permitting and inspections as source control measures for sources of FOG discharged to the sanitary sewer system.

All FSE's that discharge to an HMA are permitted and inspected semi-annually as described above in section 7.6.

ELEMENT 8 - SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

The City of Buellton through MNS Engineers, Inc. will update the 2006 Citywide Sewer Study (2006 Study). This updated study will evaluate the collection system's capacity and identify a capital improvement plan (CIP) and implementation schedule in order to respond to deficient areas identified in these evaluations. The updated study is scheduled to be completed by the end of fiscal year 2016/2017. The SSMP Element 8 – System Evaluation and Capacity Assurance Plan will be revised to incorporate the 2006 Study as currently described in this SSMP Element.

8.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(viii) states:

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

- (a). **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape the system) associated with conditions similar to those causing overflow events, estimates of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
- (b). **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and
- (c). **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP may include an implementation schedule and may identify sources of funding.
- (d). **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule may be reviewed and updated consistent with the SSMP requirements as described in [WDR Order 2006-0003-DWQ] Section D.14.

8.2 Evaluation [WDR D.13(viii)(a)]

A Citywide Sewer Study was completed in 2006 by MNS Engineers, Inc. as part of their contract for engineering services and is included in Appendix 8A. The purpose of the 2006 Study was to provide the City with a hydraulic evaluation of the collection system and pumping stations. The plan includes flow projections, hydraulic modeling, recommendations, and a final report and has been used as a basis for CIP budget planning and identification of problem areas.

The 2006 Study identified that the City’s collection system “does have sufficient capacity for current and projected flows under current General Plan build-out scenarios.” According to the 2006 Study, “there are no concerns of sewer overflows due to lack of capacity, as only a few pipe segments are at 50% of full capacity during peak flows.” The 2006 Study also indicates that “there are no pipe size or other segment constrictions within the pipe system that would create flow bottle-necks within current projected growth scenarios.”

The 2006 Study provided the following information:

1. Recommendations to update the sewer model used to create the 2006 Study with new infrastructure as the City’s collection system is expanded.
2. Recommendations to enhance the sewer model.
3. Recommendations to better define wastewater flows and organic loading from various facilities throughout the City.
4. Recommendations to better define locations and distribution wastewater flows into the collection system.
5. Such refinement would better define the sewer modeling results relative to hydraulic capacity and possible impacts to the sewer collection system.

The City plans to update the 2006 Citywide Sewer Study during fiscal year 2016/2017. This study is planned to address both dry and wet weather flows and the necessary design criteria to evaluate and provide necessary capacity enhancements for deficient areas of the system. The updated study will also utilize field conditions and information not previously available during the 2006 Study.

8.3 Design Criteria [WDR D.13(viii)(b)]

The City currently does not have a complete set of design criteria that address sewer system hydraulic evaluation and capacity assurance.

The City must formalize and standardize or incorporate by a reference a complete set of design criteria. Upon the completion of the updated Citywide Sewer Study referenced above in Section 8.2: Evaluation, the City will have a set of recommendations from MNS Engineers, Inc. regarding necessary design criteria. The City plans to utilize these recommendations to develop a set of design standards and specifications by the end of the 2017 and review and update these standards and specifications on an annual basis. The City’s Public Works Director/City Engineer will also revise this SSMP Element to include these design criteria once they are developed and adopted.

8.4 Capacity Enhancement Measures [WDR D.13(viii)(c)]

The City’s Citywide Sewer Study is scheduled to be completed during fiscal year 2016/2017 and will include a list of recommended short- and long-term CIPs, which will address any identified hydraulic deficiencies. Upon the completion of the Citywide Sewer Study, the City will revise this

SSMP Element to include these CIPs. This list of CIPs will also be reviewed and revised by the Community Development/Public Works Director on an annual basis.

8.5 Schedule [WDR D.13(viii)(d)]

The City will utilize the list of CIPs, which are incorporated into this SSMP Element through Section 8.4: Capacity Enhancement Measures, and evaluate the sources of funding identified and described in SSMP Element 4 – Operation and Maintenance Program to develop a schedule of completion dates for all portions of the capital improvement program identified in this SSMP Element. This schedule will be developed and included in this SSMP Element through a revision upon the completion of the Citywide Sewer Study and Operations Cost and Rate Analysis. This schedule will also be reviewed and revised by the Public Works Director/City Engineer on an annual basis.

ELEMENT 9 - MONITORING, MEASUREMENT & PROGRAM MODIFICATIONS

The City Public Works Director/City Engineer monitors the implementation of the SSMP elements in order to measure the effectiveness of the City’s SSMP program in reducing SSOs. The manner in which each SSMP element is monitored and evaluated and the schedule with which the City completes this monitoring and evaluation is described in this SSMP Element.

9.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(ix) states:

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; and
- (e) Identify and illustrate SSO trends, including: frequency, location, and volume.

9.2 Establishing and Prioritizing SSMP Activities [WDR D.13(ix)(a)]

Table 9-1 outlines the relevant information maintained by the City to establish and prioritize appropriate SSMP activities:

Table 9-1: SSMP Implementation Management

| SSMP Element | SSMP Information |
|---------------------|---|
| 1. Goal | This SSMP Element contains the City’s goals for the operation, maintenance, and management of the sanitary sewer collection system, which provide focus to prevent and reduce the number of SSOs and mitigate SSOs that do occur. |
| 2. Organization | A table containing names, job titles, roles, responsibilities, and contact information is contained in this SSMP Element, which allows the public, staff, and regulators to directly contact the person most knowledgeable for each aspect of the SSMP Program. An organization chart shows lines of authority. |

| SSMP Element | SSMP Information |
|--|--|
| 3. Legal Authority | Appendices to this SSMP Element contain the City Municipal Code Chapters and Sections that provide the City with its legal authority to maintain and regulate the use of its sanitary sewer collection system and enforce on violations of its sewer ordinances. |
| 4. Operation and Maintenance Program | Appendices to this SSMP Element thoroughly document the sanitary sewer system operation and maintenance activities, which are utilized to develop the City's Rehabilitation and Replacement Plan. Appendices include maps, training records, lift station inspection reports, equipment and replacement part inventories, and the CIP and associated funding mechanisms. |
| 5. Design and Performance Provisions | Appendices to this SSMP Element include the City of Buellton Department of Public Works Standard Details and City Municipal Code Sections regulating sanitary sewer design and construction. This SSMP Element also includes references to the <i>Greenbook: Standard Specifications for Public Works Construction</i> . |
| 6. Overflow Emergency Response Plan | Appendices to this SSMP Element include notification, response, and emergency operations procedures, training records, and response and mitigation programs. |
| 7. FOG Control Program | Monthly reports documenting FOG inspection results and enforcement actions will be included as appendices to Element 7 – FOG Control Program. |
| 8. System Evaluation and Capacity Assurance Plan | This SSMP Element contains the hydraulic analyses and evaluation of the City's collection system and provides the CIP that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions. A schedule for the completion of an update to the 2006 City Sewer Study, which will address dry and wet weather flows and include the CIP, is also included in this SSMP Element. |

| SSMP Element | SSMP Information |
|---|--|
| 9. Monitoring, Measurement, and Program Modifications | This SSMP Element will be updated annually with the number of SSOs that occur and their causes in a calendar year. This is the most important trend to document and the primary reason for the SSMP. |
| 10. SSMP Program Audits | SSMP Audit Reports will be appended to this SSMP Element when they are generated, which at a minimum will be biannually. |
| 11. Communication Program | Appendices to this SSMP Element contain examples of public outreach articles, flyers, and pertinent City of Buellton website addresses. |

9.3 SSMP Implementation Monitoring [WDR D.13(ix)(b)]

The Public Works Director/City Engineer is responsible for:

9.3.1 Element 1 – Goals

The City Public Works Director/City Engineer is responsible for monitoring the implementation of this SSMP Element. The City’s sanitary sewer system goals will be evaluated and progress toward meeting these goals will be measured on an annual basis by the Public Works Director/City Engineer, who will submit a staff report to the City Council in February of each year to communicate the City’s progress toward achieving the goals and implementation of the SSMP Elements. Copies of these reports will be included in Appendix 9A.

9.3.2 Element 2 – Organization

The Public Works Director/City Engineer is responsible for monitoring the implementation of this SSMP Element. The organization charts and SSO chain of communication included in this SSMP Element will be reviewed and revised to increase its effectiveness annually in February of each year.

9.3.3 Element 3 – Legal Authority

The Public Works Director/City Engineer will receive input from contract Engineering Staff on the effectiveness of the City legal authorities in preventing SSOs annually in February of each year. Information gathered from these Staff will annually be sent in a memo to the City Manager and City Attorney for consideration in updates to the City Municipal Code.

As of this revision to the SSMP, Revision 01, the City maintains the legal authorities stated by WDR Section D.13(iii) with the exception of the right to operate and maintain sewer laterals. The City does not currently own any laterals except to City-owned properties and, therefore, does not require the legal authorities to operate and maintain laterals to private properties.



9.3.4 Element 4 – Operation and Maintenance Program

MNS Engineers is responsible for creating and maintaining a geographic information system (GIS) database that stores information on every component of the collection system. As each capital improvement project is completed, or changes are made to the collection system, the information in GIS is updated to include the new information.

Routine, preventive collection system operation and maintenance activities conducted by City Staff and contractors is documented in the City's Sewer Line Cleaning Log and reviewed on a weekly basis. Staff notes the physical attributes of the sewer line while it is maintained, logs the results of observed cleaning results, and makes recommendations for future maintenance activities for the section of line being cleaned when necessary. The information is entered into the Sewer Cleaning Log as a work history record and to create future cleaning schedules. The City plans to incorporate the collection system information into the City's GIS for easy reference and use in the next five (5) years.

The City budgeted to update the 2006 Citywide Sewer Study in fiscal year 2016/2017, which will be used to create a rehabilitation and replacement plan to identify and prioritize system deficiencies using CCTV, inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes. The updated study and the system-wide CCTV inspection the City plans to conduct beginning in 2015 will be used to develop a capital improvement plan (CIP) and associated implementation time schedule.

Training is documented in the City's Staff Training Log, which includes information such as the frequency, history, and type of training completed by Staff. Operations and Maintenance Program training will be provided for City Staff on an annual basis.

Contractors implementing portions of this Operation and Maintenance Program are required to be appropriately trained on the activities they are completing through their contracts with the City and their licensing.

Critical parts and equipment, such as tools, pipe, hydro vacuum parts, and portable pumps, are tracked through the City's inventory list. The City will update this list to account for new parts and equipment as they are purchased and to account for parts and materials used in the sewer collection and conveyance system and the in the lift stations by the end of 2015.

9.3.5 Element 5 – Design and Performance Provisions

The City of Buellton contracts design services to MNS Engineers, Inc. Currently; MNS Engineers, Inc. is updating the City of Buellton Public Works Standard Details and is scheduled to complete this update by July 2015.

The *Greenbook: Standard Specifications for Public Works Construction* is utilized by the City through references to Sections and Subsections of the *Greenbook* in the City of Buellton Department of Public Works Standard Details and as the City's procedures and standards for inspection and testing the installation of sanitary system components.

City Municipal Code Chapters 14.16: Building Sewers, Lateral Sewers and Connections and 14.20: Public Sewer Construction also provide design and construction provisions, and the State of California Department of Health Services' *Guidance Memo No. 2003-02: Guidance for*

the Separation of Water Mains and Non-potable Pipelines is utilized to regulate the separation of water and sewer lines.

The Public Works Director/City Engineer is responsible for monitoring the implementation of this SSMP Element and will review and require MNS Engineers, Inc. to update these standards, specifications, and procedures annually and as changes occur.

9.3.6 Element 6 – Overflow Emergency Response Plan

The Public Works Director/City Engineer is responsible for monitoring the implementation of this SSMP Element. The City's OERP, which includes emergency response procedures, will be reviewed and revised on an annual basis by the Public Works Director/City Engineer.

If a SSO occurs, the Public Works Director/City Engineer and Field Worker Staff will evaluate the effectiveness of the OERP to determine whether any modifications need to be made to the procedures and protocol contained in the OERP and make the revisions needed to improve the effectiveness of the City's SSO response and notification processes.

The City also plans to develop a formal OERP training program by July 2015.

9.3.7 Element 7 – FOG Control Program

The Public Works Director/City Engineer is responsible for monitoring the implementation of this SSMP Element and its effectiveness at reducing SSOs on an annual basis. Wallace Group is responsible for submitting monthly FOG status reports to the Public Works Director/City Engineer to document food service establishment (FSE) permitting and inspections and responses to violations.

FOG Control Program changes necessitated by an increase in SSOs caused by FOG or an increase in the number of FSE's in violation will be developed by the Public Works Director/City Engineer.

9.3.8 Element 8 – System Evaluation and Capacity Assurance Plan

The City of Buellton through MNS Engineers, Inc. will evaluate the current collection system and provide recommendations to improve the collection system to meet the existing and future conditions. The evaluation and recommendations will be included in an update to the City's Citywide Sewer Study, which is scheduled to be completed by the end of the fiscal year 2016/2017. At that time, The SSMP Element 8 – System Evaluation and Capacity Assurance Plan will be revised and updated to reference the updated study and include its findings and recommendations. The City will also need to develop a schedule of completion dates for all portions of the capital improvement program developed in the updated study.

The four sections of SSMP Element 8 – System Evaluation and Capacity Assurance Plan are: Evaluation, Design Criteria, Capacity Enhancement Measures, and Schedule. The Public Works Director/City Engineer is responsible for reviewing and revising the Evaluation section every five years, the Design Criteria section annually, the Capacity Enhancement Measures section annually, and the Schedule section annually.

9.3.9 Element 9 – Monitoring, Measurement, and Program Modifications

The Public Works Director/City Engineer is responsible for the implementation of this SSMP Element, which is to be reviewed and revised annually. The review and revisions are to be

documented on the revision record, which is the first page of each SSMP Element. The metrics contained in this SSMP Element are important tools in the determination of what tasks and projects contained in each SSMP Element are a priority from fiscal year to fiscal year.

9.3.10 Element 10 – SSMP Program Audits

The City Public Works Director/City Engineer was responsible for the SSMP Program Audit completed on December 20, 2014 and is responsible for assuring future SSMP Program Audits are conducted and completed prior to the April 22, 2016 deadline and continuously on a two year interval following this date. SSMP Program Audits should be conducted with cooperation of all of the management, administrative, maintenance, and contract positions responsible for implementing specific measures in the SSMP program. When conducting the SSMP Program Audit, City Staff must evaluate the effectiveness of each element of the City's SSMP. A comprehensive, effective review of the City's SSMP must be documented in a SSMP Program Audit Report.

The first SSMP Program Audit followed the SSMP Program Audit process outline in SSMP Element 10 – SSMP Program Audits and effectively evaluated the status of the City's SSMP and SSMP program implementation. Upon the completion of the third SSMP Program Audit, which is due April 22, 2016, the City will reevaluate the effectiveness of the SSMP Program Audit and the manner in which it was performed in this SSMP Element.

9.3.11 Element 11 – Communication Program

The Public Works Director/City Engineer is responsible for the implementation of this SSMP Element, which is to be reviewed and revised annually. Revisions must include examples of public outreach articles, flyers and pertinent City of Buellton website addresses.

SSMP Implementation is planned to be tracked in the *SSMP Implementation Monitoring Tracking Table* found in Appendix 9A.

9.4 Preventative Maintenance Program Assessment [WDR D.13(ix)(b)]

The City's Preventative Maintenance Program includes CCTV inspection, cleaning, visual manhole inspection, and HMA identification and maintenance and has been successful at maintaining zero SSOs from 2008 to the beginning of 2012 with 2 small SSOs occurring between 2012 and 2013. These trends have been tracked in prior versions of the City's SSMP and continue to be tracked and analyzed in Table 9-2.

The improvements the City is making to its Preventative Maintenance Program are described in SSMP Element 4 – Operation and Maintenance Program and above in Section 9.3.4: Element 4 – Operation and Maintenance Program.

9.5 SSMP Updates [WDR D.13(ix)(d)]

The intention of the City is to use the SSMP for training, planning, and regular maintenance of the collection system. As the document is utilized, any deficiencies or discrepancies will be corrected. Program elements will be updated based on performance evaluations, organizational, operational, and maintenance changes, new regulatory requirements, and repairs, replacements, and upgrades made to the collection system.

At a minimum, the City will review and revise the SSMP annually. The Public Works Director/City Engineer is responsible for revising and maintaining the SSMP. A revision record will be maintained to track changes.

9.6 SSO Trends [WDR D.13(ix)(e)]

The trends in the City of Buellton’s SSOs for 2009 through 2013 are identified in Table 9-2. The cause categories identified in Table 9-2 are the causes available for use in the SSO Report in California Integrated Water Quality System (CIWQS). City Staff is responsible for determining which cause category is appropriate for each SSO when the SSO is reported in CIWQS.

Table 9-2: Number of SSOs per Indicator per Year

| Indicator | | 2012 | 2013 | 2014 | 2015 | 2016 | Total |
|------------------------------|---------------------------------|------|------|------|------|------|-------|
| No. of SSOs | | 1 | 1 | 0 | | | |
| Locations with Multiple SSOs | | 0 | 0 | 0 | | | |
| Volume (gal) | Volume | 25 | 750 | 0 | | | |
| | Volume Recovered | 0 | 300 | 0 | | | |
| | Volume Reached Surface Water | 0 | 0 | 0 | | | |
| Causes | Debris | 0 | 0 | 0 | | | |
| | Debris – General | 0 | 0 | 0 | | | |
| | Debris – Rags | 1 | 0 | 0 | | | |
| | Flow Exceeded Capacity | 0 | 0 | 0 | | | |
| | FOG | 0 | 1 | 0 | | | |
| | Operator Error | 0 | 0 | 0 | | | |
| | Other | 0 | 0 | 0 | | | |
| | Pipe Structural Problem/Failure | 0 | 0 | 0 | | | |
| | Pump Station Failure | 0 | 0 | 0 | | | |
| | Rainfall Exceeded Design | 0 | 0 | 0 | | | |
| Root Intrusion | 0 | 0 | 0 | | | | |



| Indicator | 2012 | 2013 | 2014 | 2015 | 2016 | Total |
|-----------|------|------|------|------|------|-------|
| Vandalism | 0 | 0 | 0 | | | |

Table 9-2 illustrates that the City of Buellton has excelled in operating and maintaining the sewer collection system to prevent SSOs. This Table will be updated annually and monitored as an indicator of O&M Program progress.

The information provided in Table 9-2 is derived from the historical SSO data available in the CIWQS and provided below in Tables 9-3 and 9-4. Tables 9-3 and 9-4 contain the City of Buellton’s historical SSO detail for the each SSO record, which occurred in 2012 and 2013, respectively.

Table 9-3: 2012 SSO History

| Event ID | SSO Date | Cat. | Total Vol. | Vol. Recovered | Vol. Reached Surface Water | Failure Point | Location | Cause |
|----------|------------|------|------------|----------------|----------------------------|---------------|----------------|-------------|
| 938821 | 10/27/2012 | 3 | 25 | 0 | 0 | Main | Industrial Way | Debris-Rags |

Table 9-4: 2013 SSO History

| Event ID | SSO Date | Cat. | Total Vol. | Vol. Recovered | Vol. Reached Surface Water | Failure Point | Location | Cause |
|----------|------------|------|------------|----------------|----------------------------|---------------|-------------------|-------|
| 798363 | 08/21/2013 | 3 | 750 | 300 | 0 | Main | 515 McMurray Road | FOG |

ELEMENT 10 - SEWER SYSTEM MANAGEMENT PLAN PROGRAM AUDITS

SSMP Program Audits are required to identify and correct weaknesses in the most current revision of the City's SSMP and provide a schedule to correct identified deficiencies. This SSMP Element outlines the audit process and identifies City Staff responsible for conducting or participating in SSMP Program Audits and generating the required SSMP Program Audit Report.

10.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(x) requires:

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 two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

10.2 SSMP Program Audits [WDR D.13(x)]

The City Public Works Director/City Engineer or their designee is responsible for assuring the SSMP Program Audit is conducted and completed prior to the April 22, 2016 deadline and continuously on a two year interval following this date. Audits should be conducted with the cooperation of the Public Works Director/City Engineer and Field Worker Staff. When conducting the SSMP Program Audit, City Staff must evaluate the effectiveness of each SSMP Element. A comprehensive, effective review of the City's SSMP must be documented in a SSMP Program Audit Report.

Subsequent SSMP Program Audits must be conducted continuously on a two year interval following the April 22, 2016 deadline referred to above with the next SSMP Program Audit and SSMP Program Audit Report due on or before April 22, 2018.

To assist in the audit process, the City should consider quarterly or semiannual reviews and revisions to specific SSMP Elements and associated supporting documents. These reviews and revisions will help ensure current operational practices and procedures are reflected in the SSMP and documentation of these activities is readily available during an audit by the Regional Water Quality Control Board, State Water Resources Control Board, or United States Environmental Protection Agency.

10.2.1 Summary of SSMP Program Audit Procedure

The SSMP Program Audit is completed using the following steps:

1. Gather appropriate documents using the SSMP Data & Records Request, which is provided in Appendix 10A.
2. Evaluate the effectiveness of the City's SSMP and compliance with each WDR requirement using the ranking methodology outlined in Table 10-1.

Table 10-1: SSMP Audit Ranking Criteria

| Ranking | Ranking Basis |
|------------------------|--|
| In Compliance | All requirements specified in the element are met. |
| Substantial Compliance | The majority of requirements in the element are met. |
| Partial Compliance | Half of the requirements in the element are met. |
| Marginal Compliance | Less than half of the requirements in the element are met. |
| Out of Compliance | None of the requirements in the element are met. |

3. Write the SSMP Program Audit Report and attach all documents reviewed and used as evidence of compliance with the WDR.
4. Create a plan and schedule for updates to the SSMP based on changes in operational strategies or deficiencies found in the SSMP.
5. The SSMP Program Audit Report must be signed and certified by a person designated as described in WDR J.1(i) before April 22, 2016. WDR Section J states:

All applications, reports, or information shall be signed and certified as follows:

- (i) All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.)
- (ii) An individual is a duly authorized representative only if:
 - (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and
 - (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

The SSMP Program Audit Report must be certified using the language provided below:

“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.”

6. Keep the SSMP Program Audit Report on file with the SSMP. The SSMP Program Audit Report must be available to regulators and the public upon request, and SSMP Program Audit Report must also be publicly available on the City’s website as an Appendix to the City’s SSMP. The City’s last SSMP Program Audit Report, which was completed on April 22, 2014, is included in this SSMP in Appendix 10B.

ELEMENT 11 - COMMUNICATION PROGRAM

Communicating the objectives of the SSMP and the importance of sanitary sewer system management practices to the public is essential. An informed public can assist and support the City by reducing customer caused blockages, which will potentially decrease SSOs.

11.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(xi) states:

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.

11.2 Communication Program [WDR D.13(xi)]

The purpose of the program is to educate stakeholders, which include residential, industrial, and commercial users of the collection system, on the effectiveness, importance and implementation of having a SSMP. Appendix A contains examples from 2014 & 2015 of the outreach conducted. Public awareness of different components of the SSMP is accomplished through different mediums and they may reach different audiences. The following are activities that the City of Buellton practices to increase awareness and education about the importance of having a properly constructed, maintained, and operated collection system.

Table 11-1: Communication Program Overview

| Activity | Frequency | Stakeholders | Year Implemented | |
|-------------------------------------|-------------------|-----------------------------|------------------|------|
| | | | 2014 | 2015 |
| City Website | Year-round | All | X | X |
| FOG Control Program | Twice a Year | FSEs | X | X |
| Buellton Buzz | Every other Month | City Water Service Customer | X | X |
| Buellton BBQ Bonanza | Annually | All | X | X |
| Household Hazardous and Solid Waste | Quarterly | All | X | X |
| Pretreatment Program | Annually | Industrial Users | X | X |
| City Council Meetings | As Needed | All | X | X |
| Public Works Office | Year-round | All | X | X |
| Satellite Outreach | Annual | Satellite Sewer Systems | X | X |

11.2.1 City Website

Information posted on the City website, www.cityofbuellton.com, includes links to the City SSMP, SSMP Audits, FOG contact information, Industrial Waste Discharge Program Pretreatment contact information, Council meeting minutes and agendas, flyers, education material, public service announcements, and links to the City Facebook page.

11.2.2 FOG Control Program

Since 2008, FSEs are inspected twice a year, excluding variances, which are inspected once a year, to ensure they are employed the correct FOG disposal practices. Food Service Managers are educated on best management practices (BMPs) and ways to minimize the amount of FOG being introduced into the sewer system. The City of Buellton receives monthly reports from Wallace Group on the results of the program.

11.2.3 Buellton Buzz

The City distributes the Buellton Buzz every other month along with water bills. The newsletter covers a variety of topics that may include tips on how to flush responsibly, collection system maintenance, preventative measures citizens can take to reduce damage to the collection system, residential FOG BMPs, etc.

11.2.4 Buellton BBQ Bonanza

The City hosts the Annual Buellton BBQ Bonanza for the City residents. At the BBQ, the City staffs a Public Works Department Booth with information about sewers, storm drains, water conservation methods, water, etc. The booth gives the public an opportunity to interact with the Public Works Staff and allow them to ask questions concerning any services they offer.

11.2.5 Household Hazardous and Solid Waste

MarBorg Industries is contracted by the City and conducts a quarterly household hazardous waste and solid waste round-up. Providing this service helps to prevent household hazardous chemicals from being disposed of down household drains. A quarterly newsletter is sent to the residents to inform them of the next pick up, and the City wastewater treatment plant serves as a site for the drop-off of household hazardous waste.

11.2.6 Pretreatment Program

The City Pretreatment Program educates, inspects and permits Industrial Users of the sewer collection system. The main purpose of the program is to prevent and/or minimize materials, such as winery waste, that have the potential to impact the sewer collection system and wastewater treatment plant from being discharged.

11.2.7 City Council Meetings

City Council Meetings are held on the second and fourth Thursdays of each month in the council chambers. SSMP updates and audits are presented to the public during a council meeting to receive input on the document from the public.

11.2.8 Public Works Office

The Public Works Office has copies of educational material, public service announcements, and Staff that provide assistance and education to the public.

11.2.9 Satellite Sewer System Outreach

The Public Works Director sends out an annual outreach letter to systems which are satellite to the City sewer system. This letter informs these private systems of operation and maintenance options and procedures to ensure these systems are in adequate working order based on industry standards.