

MEETING DATE: 07/13/2009

AGENDA ITEM: Approval of the Final Sewer System Management Plan

ATTACHMENTS

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RESOLUTION NO. 2007-R057

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CULVER CITY, CALIFORNIA, APPROVING THE SSMP DEVELOPMENT PLAN AND SCHEDULE AS REQUIRED BY THE STATE WATER RESOURCES CONTROL BOARD ORDER NO. 2006-0003-STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS (WDR) FOR SANITARY SEWER SYSTEMS.

WHEREAS, on May 2, 2006, the State Water Resources Control Board Order No. 2006-0003-Statewide General Waste Discharge Requirements for Sanitary Sewer Systems was adopted and implemented; and

WHEREAS, the Statewide General Waste Discharge Requirement requires preparation of a Sanitary Sewer Management Plan (SSMP) with 12 separate elements; and

WHEREAS, a SSMP Development Plan and Schedule is one of the required elements for WDR compliance and is due for completion by November 2, 2007; and

WHEREAS, a Development Plan and Schedule, has been developed for the City of Culver City.

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1 NOW, THEREFORE, the City Council of the City of Culver City, California,
2 DOES HEREBY RESOLVE as follows:

3 1. That the City Council approves the SSMP Development Plan and
4 Schedule in accordance with State Water Resources Control Board Order No. 2006-0003-
5 Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems.

6 APPROVED and ADOPTED this 22nd day of October 2007.

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10 ALAN CORLIN, MAYOR
11 City of Culver City, California

12 ATTEST:

APPROVED AS TO FORM:

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15 CHRISTOPHER ARMENTA, City Clerk
16 A07-00685

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19 CAROL A. SCHWAB, City Attorney

Sewer System Management Plan (SSMP) Time Schedule	
Task and Associated WDR Section	Due Date
SSMP Development Plan and Schedule <i>No Specific Section</i>	November 2, 2007
Goal <i>Section D.13.i</i>	November 2, 2007
Organization <i>Section D.13.ii</i>	
Legal Authority <i>Section D.13.iii</i>	May 2, 2009
Operation and Maintenance Program <i>Section D.13.iv</i>	
Overflow Emergency Response Program <i>Section D.13.vi</i>	
FOG Control Program <i>Section D.13.vii</i>	
Design and Performance Provisions <i>Section D.13.v</i>	August 2, 2009
System Evaluation and Capacity Assurance Plan <i>Section D.13.viii</i>	
Monitoring and Program Modifications <i>Section D.13.ix</i>	
Program Audits <i>Section D.13.x</i>	
Communication Program <i>Section D.13.xi</i>	
Final SSMP	

Culver CITY



SEWER SYSTEM MANAGEMENT PLAN (SSMP)

in compliance with

Statewide General Waste Discharge Requirements
for Sanitary Sewer Systems

State Water Resources Control Board
Order No. 2006-0003-DWQ

July 2009



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1.0 GOALS

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.

The goals of the program are to ensure:

1. That Culver City collection system facilities are properly managed, operated, and maintained to minimize SSOs and their impacts on receiving waters and on public health and safety;
2. That when SSOs do occur, that all feasible steps are taken to mitigate their impacts;
3. That SSOs are promptly reported to the appropriate regulatory authorities and the public is adequately notified, and
4. That all SSOs, system deficiencies and remedial actions taken are well documented.

2.0 ORGANIZATION

- a) The name of the responsible or authorized representative as described in Section J of this Order (WDR).
- 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 person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

PART 2.a) Authorized Representative

The City has designated a Legally Responsible Official (LRO) pursuant to Section J., REPORT DECLARATION, of the State General WDR (Order No. 2006-0003). Contact information for the City's LRO/Authorized Representative is provided below:

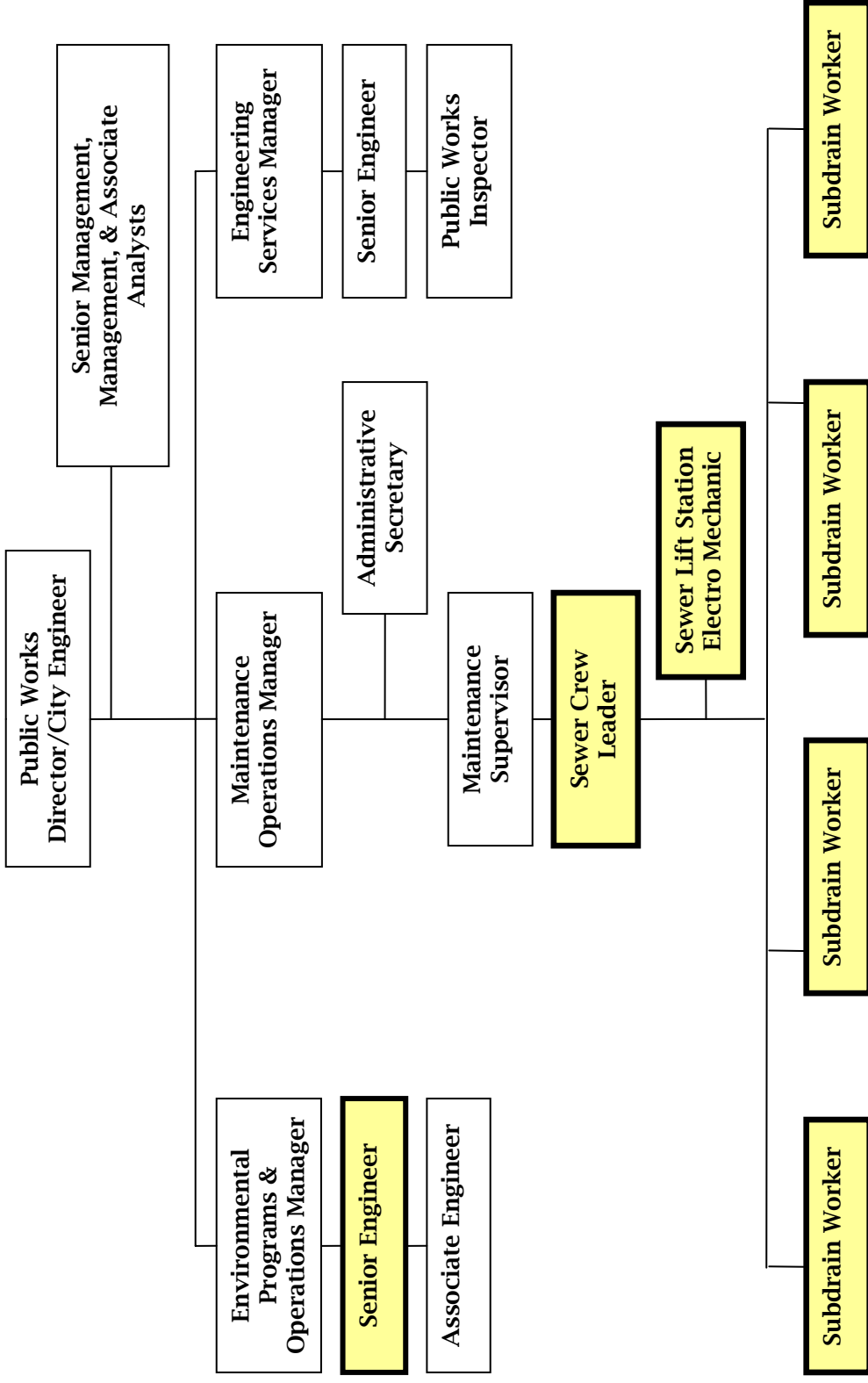
Mr. Charles D. Herbertson, P.E., P.L.S.
Director of Public Works/City Engineer
9700 Culver Boulevard, Culver City, CA 90232
(310) 253-5630; charles.herbertson@culvercity.org

PART 2.b) Organization Chart

The Director of Public Works is responsible for the execution of the compliance actions required under the WDRs. This includes, but is not limited to, signing and certification of all reports and correspondence as required under this Order. The Public Works' Division Manager of Environmental Programs and Operations and the Division Manager of Maintenance Operations may also perform these duties on behalf of the Director of Public Works.

Mr. Damian Skinner
Environmental Programs & Operations Division Manager
9505 W. Jefferson Boulevard, Culver City, CA 90232
(310) 253-6421; damian.skinner@culvercity.org

Mr. Heustace Lewis
Maintenance Operations Division Manager
9505 W. Jefferson Boulevard, Culver City, CA 90232
(310) 253-6444; heustace.lewis@culvercity.org



Staffing for sewer maintenance and operations consists of six budgeted positions in the Public Works Department as depicted in the organization chart (highlighted boxes). These personnel provide preventative maintenance and assure operation of the collection system as well as engineering services needed to evaluate the system for improvement and rehabilitation.

Description of Responsibilities The responsibilities (in respect to the SSO program) of each position shown on the Organization Chart are:			
City Council		Responsible for establishing new laws and amending existing regulations.	
City Manager		The chief executive officer of the City. Provides general direction to the Director of Public Works. Receives broad policy direction from the City Council.	
Public Works Department	Director of Public Works		Directs and administers the City's sewer maintenance program within the scope of the City Manager's direction.
	Maintenance Operations Division	Maintenance Operations Manager	Responsible for the day-to-day operation and maintenance of the sanitary sewer collection system. Also responsible for supervision of the field crews.
		Sub Drain Crew Leader	Responsible for carrying out the tasks assigned by the Public Works Maintenance Operations Manager, including assigning specific tasks to crews. Maintains and operates the City's sewage collection system and pump stations on a day to day basis.
		Heavy Equipment Operator(s)	Operates heavy equipment in the field.
		Sewer Lift Station Electro Mechanic	Responsible for the ongoing electrical and mechanical maintenance of the City's sewer lift stations.
		Maintenance Workers	Conduct maintenance activities, including sewer cleaning and regular inspections of the sanitary sewer system.
		Administrative Secretary (Customer Service Staff)	Receive complaints and requests for investigation from various sources and refer to appropriate staff.

Description of Responsibilities The responsibilities (in respect to the SSO program) of each position shown on the Organization Chart are:			
Public Works Department	Environmental Programs and Operations Division	Environmental Programs & Operations Manager	Responsible for planning, organizing, coordinating and directing the City's SSMP under the overall direction of Director of Public Works.
		Senior Engineer	Responsible for conducting engineering reviews of the sanitary sewer system for new and repaired sewer lines to ensure compliance with applicable regulations. Reports SSOs to Los Angeles Regional Water Quality Control Board and Los Angeles County Department of Public Health. Provides engineering support and analysis relating to operation and maintenance of the City's sewer system.
		Associate Engineer	Supports the Environmental Programs Division's efforts, including budget assistance, correspondence and reports. Assists the Senior Engineer in performing his/her duties.
	Engineering Division	Engineering Services Manager	Responsible for the day-to-day operation of the Engineering Division; implements direction from the Public Works Director/City Engineer. Plans and oversees capital improvements to the City's sewer system.
		Senior Engineer	Manage capital improvement projects and review and approve designs for new and repaired sewer lines and pump stations
		Sr. Management Analyst	Responsible for drafting the City's draft Sewer Spill Emergency Response plan and will assist staff to finalize the plan.
		Public Works Inspector	Conducts field inspections to ensure proper construction of new and repaired sewer lines.
		Management & Associate Analysts	Provides support interface between the Engineering, Maintenance Operations, and Environmental Programs and Operations Divisions.

Key Support Departments

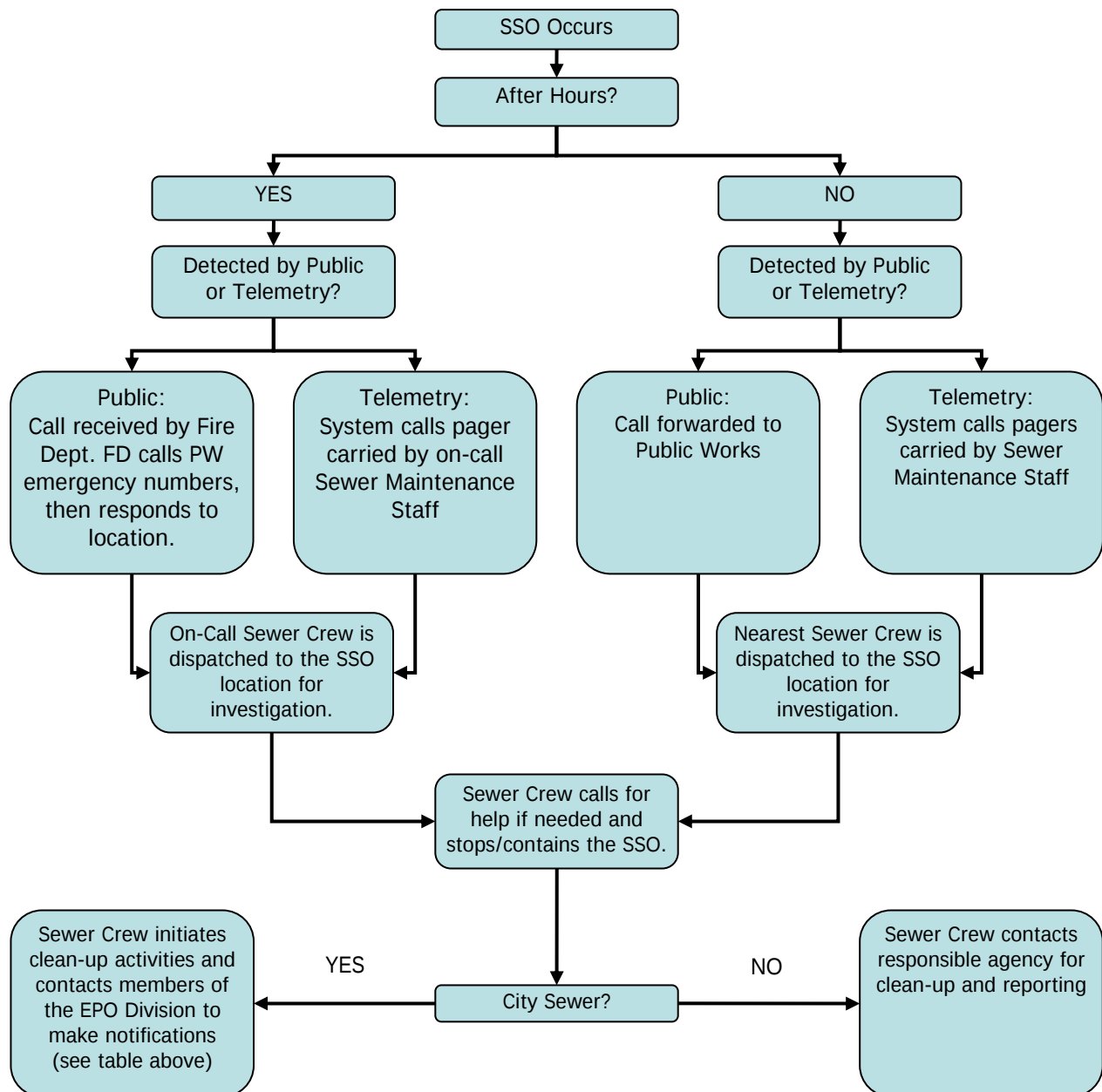
Other City Departments and outside agencies are currently and will continue to be responsible for carrying out some WDR compliance activities. The key support departments and their responsibilities are described below:

- Building and Safety Division: responsible for issuing permits for sewer connections on private property and for the enforcement of the Plumbing Codes involving proper connection, maintenance of sewer house laterals and illegal discharges into the public sewers.
- County of Los Angeles, Dept. of Public Works – Industrial Waste: Culver City contracts with the County of Los Angeles to administer the Culver City industrial waste program. The County's primary task in this capacity is the control of fats, oils and grease.
- County of Los Angeles, Dept. of Public Works – Flood Maintenance Division: would assist Culver City in tracing, containing, and cleaning up of SSOs that reach the County-owned storm drain system.
- Information Technology Division: maintains GIS and electronic mapping of the sewer system. Also assist in maintenance and trouble shooting of computer and communication systems that monitor sewer pump stations and alert staff of system alarms.
- Human Resources Division: responsible for recruitment and securing staff.
- City Attorney's Office: provides legal support and assistance in developing adequate legal authority to regulate illegal discharges into the sewer system and assists in prosecuting violators.

PART 2.c) Chain of Communication

SSO NOTIFICATION CONTACT NUMBERS			
AGENCY	INFO	CATEGORY 1	CATEGORY 2
		>1,000 gallons, &/or not all contained	<1,000 gallons & all contained
State Water Resources Control Board (SWRCB)	Submit info on this page at http://ciwqs.waterboards.ca.gov/	ASAP	30 days
State of CA / Office of Emergency Services (OES)	(800) 852-7550	Immediately	--
Los Angeles Regional Water Quality Control Board (LARWQCB)	(213) 576-6720 (213) 620-6140; fax written notification	Immediately	--
Department of Health Services (DHS)	(213) 974-1234 (626) 430-5420	Immediately	Immediately
Los Angeles County Flood Control District	(818) 896-0594 (818) 248-3842; business hours only	Immediately	--

CULVER CITY SSO PROCEDURES FLOW CHART



3.0 LEGAL AUTHORITY

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

The Culver City City Council has the authority to make and enforce all rule and regulations necessary for the cleaning, repair, construction, reconstruction, renewal, replacement, operation, and maintenance of collection sewers within the City.

The Culver City Municipal Code (CCMC) Chapter 5.02: Sewers and Chapter 5.05 Stormwater and Urban Runoff Pollution Control have been adopted by City Council to govern aspects of Culver City sewer operations. The legal authorities for the specific areas stipulated in the WDRs are discussed below. The codes, standard plans, specifications and other materials cited in this chapter are filed at the office of the Director or Public Works/City Engineer.

PART 3.a) Prevention

CCMC Section 5.02.410.A provides that the City's collection system will accept liquid wastes provided the wastes will not:

1. Damage structures;
2. Create nuisances such as odors;
3. Menace public health;
4. Impose unreasonable collection, treatment or disposal costs on the City;
5. Interfere with wastewater treatment processes;
6. Exceed quality requirements set by regulatory government agencies; or
7. Detrimentially affect the local environment.

To further regulate sewer discharges, CCMC Section 5.02.410.B adopted the following provisions of the County of Los Angeles Code Title 20:

Chapter 20.20, Sections 20.20.010 through 20.20.420, Definitions;
Chapter 20.24, Sections 20.24.010 through 20.24.210, General Provisions;
Chapter 20.32, Sections 20.32.440 and 20.32.640 through 20.32.690, Sanitary Sewers;
Chapter 20.36, Sections 20.36.010 through 20.36.550, Industrial Waste.

All of the above provide adequate legal authority to prevent infiltration and inflow, stormwater, chemical dumping, unauthorized debris and cut roots, etc.

PART 3.b) Proper Design & Construction

CCMC Section 5.02.020, Connection Specifications, provides construction specifications for the construction of connections to any City sewer. The City has adopted the Standard Specifications for Public Works Construction (SSPWC). The SSPWC is used for the construction of all sewer facilities constructed in the public right-of-way and inspections are performed by City staff through the Public Works Encroachment Permit process authorized by CCMC Section 5.02.005.

PART 3.c) Accessibility

Through adoption of the portions of Title 20, Division 2 of the Los Angeles County Code, Culver City has the legal right to set requirements that allow unrestricted maintenance access to public sewer infrastructure. This access is secured through enforcement of the requirement for sewer easements around all public sewer appurtenances located in private properties and through prescriptive easements. These easements are detailed by the designer on the sewer construction plans and are reviewed through the iterative plan check process. Plan checkers take special care to ensure that maintenance crews will have room for access and equipment usage for both routine maintenance and replacement or repair construction as necessary. The Title 20 requirements to leave these easements free of obstruction are also reiterated on all sewer plans that contain easements, and the potential for conflict or restriction of access is reviewed carefully during plan check.

PART 3.d) Limiting the Discharge of FOG and other Debris

Culver City, under CCMC 5.02.410 and LACO Code Section 20.36.400, prohibits the discharge of wastes that will damage the system or cause interference with conveyance or treatment processes. Additionally, non-residential discharges are specifically subject to additional regulation as may be required to protect the sewer system or to maintain its operation. Additional regulation would take the form of the installation of grease interceptors at restaurants and other food establishments that generate grease. Through adoption of LACO Code Section 20.24.090, Culver City has the legal authority to inspect main-line sewers, sewage pumping plants, interceptors etc., as often as deems necessary to verify that such facilities are maintained and operated in accordance with the provisions of Division 2 of LACO Code.

Lastly, Culver City contracts with the County of Los Angeles Department of Industrial Waste (LACDIW) for the control of deleterious substances. LACDIW administers the Industrial Waste Permit program in Culver City that reviews development plans and requires pre-treatment devices where warranted. LACDIW also administers the commercial site inspection program used to verify compliance with permit conditions and to verify proper maintenance of pretreatment devices.

PART 3.e) Enforcement

Under CCMC 5.02.410C and Section 20.24.100 of the LACO Code, the Director of Public Works/City Engineer is empowered to enforce all the requirements prescribed in Division 2 – Sanitary Sewers and Industrial Waste of the LACO Code and in accordance with section 20.24.110 may delegate this authority. LACO Code Section 20.24.160 allows criminal penalties for any violations of the Sewer and Industrial Waste Ordinances.

4.0 OPERATION AND MAINTENANCE PROGRAM

- 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 preventative 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 schedule 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.**

PART 4.a) Mapping System

As-built plans of Culver City sewer facilities are maintained by the Engineer Division of the Public Works Department. Record drawings for most of the collection system and pump stations have been scanned and are available through the City's computer network. The City also maintains a GIS system with a sewer GIS layer. Plans are available and can be accessed through the GIS system as well. The plans provide information such as system locations and alignment, pipe material and size, etc. Original Mylars and linens are stored in the Engineering Division Office in City Hall located at 9770 Culver Boulevard, Culver City, California. These maps are distributed to field crews, for work scheduling and for responding to emergencies. The maps are updated to reflect any changes in the system.

A map showing the locations of Culver City field maintenance yard and pump stations is presented in Appendix C. Following the map is an inventory of Culver City collection system facilities, Appendix D.

PART 4.b) Preventative Maintenance (PM) Program

Culver City maintenance services and SSO responses are provided from the Culver City Maintenance Facility located at 9505 Jefferson Boulevard in Culver City. The maintenance crews are equipped with some of the latest technologies in the industry including radio equipped trucks for easy communication,

cellular phones, heavy and light construction equipment, vacuum trucks, pumps, generators, close circuit television units for interior inspection of sewer lines and various types of safety equipment. A complete inventory of Culver City equipment is presented in Appendix B.

The cornerstone of Culver City maintenance operation is the preventive maintenance program. This program consists of regular inspection of the sewer system including manholes, pipes, siphons, and pump stations and regular cleaning, repair, replacement of equipment and other related activities. This program is designed and carried out to detect and correct potential problems before they develop into major problems. The following is a summary of the key preventive maintenance activities and where applicable, frequencies for these services have been included:

- *Sewer Line and Manhole Inspection*
The interior and exterior of manholes are inspected at least annually to detect any structural defects, sewage flow condition, presence of vermin or rodents, deleterious industrial waste, odors and any signs of unusual settlement within sewer manholes maintained by Culver City. These inspections are performed when sewer line cleaning is performed.
- *Gas Trap Manholes and Siphons*
On a monthly basis, these facilities are inspected and cleared of any stoppages or flow restrictions.
- *Drop Manholes*
These facilities are inspected and cleared of stoppages and flow restrictions on variable frequencies based on prior inspection records.
- *Sewer Line Cleaning*
Sewer lines are cleaned by hydro jet or rodding. Frequency of cleaning is based on inspection records. Sewer lines known to accumulate grease, garbage grinds or sand are put on, quarterly, semi-annual or annual cleaning schedule, and those prone to root growth are periodically rodded or chemically treated.
- *Vermin and Rodent Control*
Sewers infested by insects are chemically treated. Those infested by rodents are baited.
- *Sewage Pump Station*
The City operates 7 sewer pump stations. All pump stations are equipped with telemetry/alarm systems and are inspected weekly. Pumps and motors are lubricated, control mechanisms and valves are checked and adjusted as necessary, and equipment is repaired or modified as required. Routine maintenance of pump stations is scheduled through the Maintenance Management System (MMS - MaintStar).
- *Work Scheduling*
Most work orders are generated and tracked using the Department's Maintenance Management System. The current system was developed and installed by MaintStar. Maintenance regimens have been developed based on past maintenance history and work orders are automatically issued by the system. When work orders are complete, field staff acknowledges completion on the MMS.

PART 4.c) Rehabilitation and Replacement Plan

Sewer facilities assessment and rehabilitation are an integral part of Culver City's preventive sewer maintenance program. Through the condition assessment described below, the City identifies portions of the system that require rehabilitation or replacement. Ongoing projects that complete localized sewer pipe repair or trenchless repair or lining are completed annually. Additionally, significant investment in system redundancy will occur in Fiscal years 2010, 2011, 2012 and 2013. Modifications to pump stations and construction of redundant force mains will be completed to provide a more failsafe system.

Most pipelines within Culver City are made of vitrified clay and range in diameter from six to fifteen inches. As the sewer collection system ages, the risk of failure increases. Issues of concern include deterioration, collapse, blockage, excessive inflow and infiltration, overflow, and other potential service interruptions.

In an effort to overcome these challenges the City has inspected all 85 miles of sewer lines since 2000 using a video inspection service. An accelerated CCTV inspection program is planned starting in FY 2009-10. Based on these inspections, the City has embarked on an aggressive program of spot repair, pipe lining and manhole rehabilitation. In an effort to further comply with the WDRs, the City plans to inspect at least 10% (8.5 miles) of collection sewers annually. Repair and rehabilitation projects are identified and prioritized based on these CCTV inspections.

Maintenance history, past overflow records, sewer locations, and age will be some of the factors used to prioritize the CCTV schedule. The City's GIS system is being upgraded to include CCTV record access through the GIS system which will make the CCTV records easily accessible to maintenance staff.

In 1987, Culver City established the Sewer Enterprise Fund for the maintenance and improvement of the collection system. Many miles of sewer lines have been rehabilitated by lining or reconstruction. In addition, some deteriorated lines are discovered during preventive maintenance televising of problem sewer lines. These lines are either immediately repaired by City crews or by emergency contractors or are added to the list of future Capital Improvement Programs (CIPs). In compliance with WDR's, all sewer pipe segments within Culver City found to have structural deficiencies will continue to be rehabilitated or reconstructed through the Sewer CIP. Many hydraulic deficiencies within the system have been addressed through previous projects.

PART 4.d) Staff Training

Culver City staff responsible for the operation and maintenance of the sewer collection system and City inspectors and engineering staff are well versed in sewer construction standards developed by the American Public Works Association. City maintenance crews attend training provided by California Occupational, Safety and Health Administration (CALOSHA), and City engineers attend training provided by California Water Environment Association (CWEA). These trainings will keep them abreast with the latest technology in the industry on how to safely and efficiently carry out their tasks. The District also utilizes informal training approaches, such as tailgate meetings and safety meetings.

Additionally, sewer construction in Culver City can be performed only by construction companies with verified successful experience working on sewer facilities.

PART 4.e) Equipment Maintenance and Replacement Policy

Culver City has a comprehensive equipment maintenance program. Equipment is regularly checked, adjusted, repaired or replaced as necessary. Maintenance is performed by staff mechanics according to manufacturer-recommended maintenance regimens. Equipment replacement is accomplished through an equipment replacement fund. Funds are set aside annually based on estimated equipment life and replacement cost.

5.0 DESIGN AND PERFORMANCE PROVISIONS:

- 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 inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.**

PART 5.a) Design and Construction Standards and Specifications

All sewer construction in Culver City must be performed according to the Standard Plans and Specifications for Public Works Construction developed by the American Public Works Association. The use of these standards ensures that sewer lines and connections are properly designed and constructed. To further assure that sewer facilities are properly designed and constructed, Culver City requires that plans are designed by licensed engineers and provides thorough review of plans prior to approval.

APWA Greenbook standards and specifications are used in the construction of sewer facilities and registered civil engineers must design any proposed sewers. Projects initiated and funded by the City are designed either by City engineers or, where additional expertise is required, consultant engineering support is used.

PART 5.b) Procedures and Standards for Inspection and Testing

The Culver City Public Works Department provides inspection for the installation of new and rehabilitation of deteriorated collection sewer facilities within the City. City inspectors and staff are well trained in pipeline and pump station construction. They attend training classes and educational seminars to stay familiar with advancements in the industry. The inspectors are also provided with adequate materials to perform their jobs, including the Standard Specification for Public Works Construction Inspection Manual, the Green Book, etc. The City requires the preparation and submittal of "As-Built" plans of completed projects prior to final approval and acceptance of the project as public infrastructure.

6.0 OVERFLOW EMERGENCY RESPONSE PLAN

- a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- b) A program to ensure an appropriate response to all overflows;
- c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, 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 Emergency Response Plan and are appropriately trained;
- e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

Sanitary Sewage Systems Operational Procedures

The City's sanitary sewer system is maintained by the Sewer Maintenance Division of the Public Works Department. The system is designed to transport wastewater to Force Main operated by the City of Los Angeles for further transportation, treatment and eventual discharge to Hyperion Treatment Plant. Failure at any points within either the Culver City's or the City of Los Angeles' system can result in a spill of raw sewage which could threaten public health and contaminate the environment. The same threat-scenario is true of spills that may originate from private disposal systems (septic tanks and/or cesspools) or private property (blocked or failed private property sewer laterals).

Purpose: to reduce the potential impact of City sanitary sewage system operations on storm water quality, to the maximum extent practicable, by ensuring that:

- 1) sewage system overflows or leaks do not enter the storm drainage system,
- 2) potential and actual sanitary sewage blockages are remediated and suspected cross-connections are investigated, and
- 3) public health officials are notified when there is a threat to public health.

Scope: These operational procedures are applicable for all sanitary sewer pipes and pump stations owned by the City. In addition, the "Spill Response" provisions shall also pertain for all private facility or other agency discharges that threaten to enter the City's storm drainage system or other receiving waters.

GENERAL RESPONSE PROCEDURES

The three fundamental phases of all responses to a sanitary sewer spill are: *contain*, *control*, and *cleanup*.

The first personnel on scene are to *contain* the spill or, in other words, to keep it from entering the storm drainage system or other receiving waters. This may be done in any number of ways, including the use of sand or soil dikes, sand bags, or by plugging the outlet pipe of a catch basin.

Once the spill is contained, it needs to be brought under *control*. That is, the impacted line must be relieved (the blockage removed) or bypassed (pumped to the next flowing manhole) if the line has failed.

The third and final step of the response is *cleanup*. All surfaces touched by the spill must be washed down, disinfected and the run-off contained and removed for proper disposal.

INITIAL SPILL RESPONSE PROCEDURES

1. The Director of Public Works or designee thereof shall be immediately dispatched to the site to take control of the scene as the Incident Commander. Field crews will be immediately prepared to respond with all available equipment including diking materials, sewer bypass pumps, vacuum truck and traffic control equipment.
2. The Incident Commander shall assess the magnitude of the spill by estimating the gallons per minute of the flow or by the accumulation of spillage. If any sewage enters the storm drain system, immediately notify the L.A. County Department of Health Services, L.A. County Public Works, Flood Control Division and the L.A. Regional Water Quality Control Board. The State Office of Emergency Services must be notified if the spill, in the Incident Commander's discretion, presents a hazard to human health or the environment.
3. Based on his/her assessment of the situation, the Incident Commander shall declare the spill either a Stage I, Stage II, or Stage III spill in accordance with the following parameters:
 - Stage I: restrictions causing a flow rate contained in the manhole or overflowing at a rate not to exceed 5 gallons per minute (gpm).
 - Stage II: blockage or restriction causing overflow at a rate from 5-25 gpm.
 - Stage III: blockage or restriction causing overflow exceeding 25 gpm.

STAGE I: SPILL RESPONSE PROCEDURES

1. Immediately notify the sanitary sewer systems supervisor, who in this case should act as the Incident Commander. Incident Commander shall immediately notify the appropriate department/division managers and the Stormwater Program Manager at (310) 253-6445.
2. Contain the spillage immediately by building berms around the spills using sandbags and vac truck. Block openings of nearby storm drain catch basins using sandbags. If necessary, set up the bypass pump, and pump to a downstream sewer manhole. If any wastewater inevitably enters the storm drain, build a temporary dam (using sandbags) in downstream storm drain system, to avoid wastewater entering the receiving waters.
3. Determine the generation point of the spill (Culver City line, City of Los Angeles Trunk line, or private property). If City generated, clear the restriction and proceed to Step 6. If City of Los Angeles generated, contact City of Los Angeles Bureau of Sanitation, clear the restriction, and proceed to Step 4. If generated from private property, contact the property's occupant of their responsibility to control the discharge and proceed to Step 5. If the occupant refuses to comply, contact Code Enforcement (310-253-5940), or the Los Angeles County Department of Health Services at (626) 430-5360.
4. City of Los Angeles Spills – City staff should continue to maintain containment of the spill, and seek to clear the restriction, until City of Los Angeles crews arrive. Once City of Los Angeles crews are on scene, the City of Los Angeles is responsible for clearing the blockage (if not done already) and for

cleanup, but the Incident Commander maintains responsibility for ensuring that the area is returned to its natural state. At the discretion of the City's Incident Commander, City crews may be required to assist in these operations. Proceed to Step 6.

5. Private Property Spills – City staff should continue to monitor the spill, how the spill is contained, and how materials are disposed. Ensure proper containment and cleanup. If the spill should reach the public right-of-way, it is then the City's responsibility to ensure that the spill is contained and that proper cleanup measures are completed. Proceed to Step 6.
6. Take photographs of the spill and include them for review by the NPDES Coordinator and Department Head. If the spill did not generate from private property but has entered private property, a copy of the report and photos must be forwarded to Risk Management. Staff will request permission of the occupant of the private property before taking any pictures on private property. Confine pictures to only the areas affected by the spill.
7. Investigate the overflow incident and develop a written chronology that describes: 1) the cause of the overflow/spill; 2) approximate volume of the spill (and the volume, if any, that entered the storm drain system); 3) overflow/spill route; 4) storm drain catch basins that were compromised; 5) events and actions that led up to the spill; 6) time and date of events; 7) names and titles of personnel present on scene of spill/overflow; and 8) actions taken to correct the situation, including containing the overflow as well as remediation. This information is required for Department records. If the spill occurs in a business area, or if it is suspected to have been the result of a commercial or business activity, contact the City's Stormwater Program Manager at (310) 253-6445 to assist with the investigation.
8. Clean up the spill area and remove containment. Appropriately dispose of contaminated sandbags. Leave the area as clean as practicable. When washing down contaminated areas or streets, block all nearby storm drain catch basin openings with sandbags to prevent wash water from entering the storm drain system. Usually, low concentration (20:1) bleach solution is used for disinfection and for odor removal. Place temporary dikes using sandbags to capture runoff and vacuum up all run-off from surfaces that were in contact with the spill. Emphasis should be placed on removing all materials that are in or around the contaminated area. If storm drain system was compromised with wastewater, a professional cleaning company should be contacted to flush out the system with clean water (no chemicals). A temporary dam will be erected downstream to capture wash water until it is vacuuming extracted. **Under no circumstance is disinfectant-contaminated water allowed to enter a catch basin. All such water must be removed from the site (i.e. vacuumed up) and properly disposed of.**
9. Check and clear downstream manholes. It is possible that debris may accumulate at the next downstream manhole following a backup. Always check the lower manhole to ensure that the line is flowing properly.
10. The Incident Commander must fill out a Sewer Spill Report form.

STAGE II: SPILL RESPONSE PROCEDURES

1. Immediately notify the sanitary sewer systems supervisor, who in this case should act as the Incident Commander.
2. Berm the sewage flow with sandbags, block all storm drainage inlets and set up to start pumping to the closest clear manhole as soon as possible.
3. Incident Commander shall immediately notify the appropriate department/division managers and the Stormwater Program Manager at (310) 253-6445. All major decisions, especially those that could potentially compromise worker safety or the City's liability should have clearance from Senior Civil Engineer (in charge of Waste Discharge Requirement associated with Sanitary Sewer System), Maintenance Operations Manager, and/or Director of Public Works prior to implementation.
4. In addition, the Incident Commander shall:
 - Request assistance of other agencies and/or contract firms for additional pumps to stabilize the situation. See pages 8 to 10 for list of phone numbers.
 - Contact the Stormwater Program Manager at (310) 253-6445.
 - The Stormwater Program Manager will contact the Los Angeles Regional Water Quality Control Board (213-576-6600), California Coastal Commission (805-585-1816 or 562-590-5071), and California Department of Fish and Game (562-708-7757), if needed.
 - Contact City Fire HazMat (310-253-6248) and request assistance with appropriate agency notifications and initial emergency response.
 - City Fire HazMat will contact Los Angeles County Fire Department (Health HazMat), and in case of emergency or if spill exceeds 1,000 gallons, the Governor's Office of Emergency Services (OES, 800-852-7550), and in case spill enters the storm drain system, Los Angeles County Department of Health Services (626-430-5360, or for after hours, 213-974-1234).
 - Contact Police Dispatch (310-253-6248; x6202 watch commander; x6805 for 24-hr battalion) and request assistance with traffic control, if needed.
5. Make all notifications as specified within Stage I response plan.
6. If spill exceeds 5 g.p.m. for three (3) hours or twenty-five (25) g.p.m. for one (1) hour, immediately move to Stage III.
7. Complete Steps 3 through 10 of Stage I Response.

STAGE III: SPILL RESPONSE PROCEDURES

1. Immediately notify the sanitary sewer systems supervisor, who in this case should act as the Incident Commander.
2. Berm the sewage flow with sandbags, block all storm drainage inlets and set up to start pumping to the closest clear manhole as soon as possible.
3. Sanitary sewer systems supervisor shall immediately contact Yard for additional personnel and equipment to assist with clean up and spill containment.
4. Sanitary sewer systems supervisor shall immediately notify the appropriate managers in the following order: Maintenance Operations Manager (x6444), the Senior Civil Engineer in charge of the Waste Discharge Requirement for sanitary sewer system (x5604), and Director of Public Works (x5630). The managers will:
 - Choose, among the managers, an Incident Commander and send immediately to the incident location to coordinate and oversee the incident (in the interim, until the arrival of a manager-Incident Commander, the sanitary sewer supervisor shall act as the Incident Commander);
 - Request assistance of other agencies and/or contract firms for additional pumps to stabilize the situation. See page 6 for list of phone numbers.
 - Contact the Stormwater Program Manager at (310) 253-6445.
 - The Stormwater Program Manager will contact the Los Angeles Regional Water Quality Control Board (213-576-6600), California Coastal Commission (805-585-1816 or 562-590-5071), and California Department of Fish and Game (562-708-7757).
 - Contact City Fire HazMat (310-253-6248) and request assistance with appropriate agency notifications and initial emergency response.
 - City Fire HazMat will contact Los Angeles County Fire Department (Health HazMat), and in case of emergency or if spill exceeds 1,000 gallons, the Governor's Office of Emergency Services (OES, 800-852-7550), and in case spill enters the storm drain system, Los Angeles County Department of Health Services (626-430-5360, or for after hours, 213-974-1234).
 - Contact Police Dispatch (310-253-6248; x6202 watch commander; x6805 for 24-hr battalion) and request assistance with traffic control, if needed.
5. Perform Steps 3 through 10 of Stage I. All major decisions, especially those that could potentially compromise worker safety or the City's liability should have clearance from managers prior to implementation.

Spill Response Follow-Up

1. File completed Sewage Spill Reporting Form and photographs with the City's Stormwater Program Manager.
2. For spills involving 1,000 gallons or more, the Storm Water Program Manager will immediately file a verbal report with the Office of Emergency Services. For spills entering the storm drain, the Storm Water Program Manager will immediately file a verbal report with the Los Angeles County Department of Health Services and Los Angeles Regional Water Quality Control Board. Verbal reports to all agencies shall be followed up within 1 week by submitting to the agencies a required written report that includes the Sewage Spill Reporting Form and photographs within 1 week of the spill. The report must contain the following information:
3. Determine cause of overflow or spill and ascertain whether pump station or sewer line(s) need to be placed on a higher maintenance schedule or if capital repairs are needed.
 - Estimated volume of spill and amount that was discharged to surface waters (i.e. into storm drains and/or channels).
 - A discussion of the circumstances that caused the spill.
 - A discussion on the impacts on public health or environment resulting from the spill and corrective actions taken to mitigate the effects.

Outside Resources Contact List

Sewage Spill Response Companies

Allwaste

2222 E. Sepulveda Boulevard
Carson, CA 90810
(310) 595-1000

Baker Tanks

5500 Rawlings Avenue
South Gate, CA 90280
(562) 904-3680

National Plant Services

1461 Harbor Avenue
Long Beach, CA 90813
(562) 436-7600

Ocean Blue (Environmental Services, Inc.)

925 W. Esther Street
Long Beach, CA 90813
(562) 624-4120

United Pumping Service, Inc.

14016 E. Valley Boulevard
City of Industry, CA 91746
(818) 961-9326

OUTSIDE AGENCY NOTIFICATION NUMBERS

A. City of Los Angeles

- a. If spill is originating from a City of Los Angeles Trunk Line
City of Los Angeles – Bureau of Sanitation
Phone: (213) 485-7575 (Sewage Spill Hotline Main #)
Phone: (213) 485-5391 (Sewage Spill Hotline Weekdays, 6:30AM – 1:00AM)
Phone: (310) 823-5507; (310) 822-0777 (Night Emergencies, 1:00AM – 6:30AM)

B. County of Los Angeles

- a. When sewage enters storm drain system:
L.A. County Department of Public Works
Floor Maintenance Division
Phone: (800) 675-4357, ext. #1
- b. Call ONLY if storm drain is compromised or if spills enter receiving water(s):
L.A. County Department of Health Services
Phone: (626) 430-5360
After hours: (213) 974-1234

C. State Office of Emergency Services

- a. If spill exceeds 1,000 gallons or presents hazard to human health or environment
Hazardous Spills Notification
Phone: (800) 852-7550

D. Other Agencies (to request assistance)

- a. City of Los Angeles: (213) 485-7575
- b. County of Los Angeles: (800) 675-HELP (4357)
- c. City of Hawthorne: (213) 216-2356 (Richard Carver)
- d. City of El Segundo: (310) 524-2760
- e. City of Manhattan Beach: (310) 802-5320; (310) 345-2442 (Justin Gervais)
MB Police Station: (310) 802-5100

E. Regional Water Quality Control Board

- a. When sewage spill enters the storm drain system or Ballona Creek/Marina del Rey Harbor
Technical Support Unit – Spills Report Duty Officer
(213) 576-6720, if no answer, (213) 576-6600
After hours: (213) 774-4238
Fax: (213) 576-6640

F. California Coastal Commission

- a. (805) 585-1816; (562) 590-5071

G. California Department of Fish and Game

- a. (562) 708-7757

7.0 FOG CONTROL PROGRAM

- 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 discharge 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 Enrollee 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.**

PART 7.a) Public Education Outreach Program

Culver City contracts with the County of Los Angeles Department of Public Works Industrial Waste Unit (County Industrial Waste) to implement its FOG program. Industrial Waste staff inspects restaurants and industrial facilities to assure that appropriate grease interception devices are installed and maintained. Inspectors provide information on proper installation, maintenance and operation of pretreatment facilities. Industrial Waste staff also review development plans to determine and require pretreatment facilities if they are deemed necessary. City staff work closely with Industrial Waste staff and assist with enforcement actions when needed.

PART 7.b) Disposal

Solidified fats found in the collection system during cleaning operations are trapped, collected and taken to the maintenance yard dump bins. These and other debris collected from the system are properly disposed of. FOG in liquid form is flushed down by hydro jetting to City of Los Angeles' treatment facilities for treatment and disposal.

PART 7.c) Legal Authority

The legal authority to prohibit discharges of FOG into the sewer system is discussed in Chapter 3 of this document. Requiring grease interceptors at food establishments to prevent the discharge of grease to

the collection sewer system and educating the public on proper disposal methods for FOG are also discussed above.

PART 7.d) Grease Removal Devices

As provided in CCMC Section 5.02.410.B, the Director of Public Works is authorized to enforce Title 20, Division 2, Section 20.24.100. Pretreatment devices are required for industrial waste generating facilities, including restaurants and other food establishments. They are required to be designed in accordance with County Industrial Waste standards and installed and operated in a manner to control discharges of FOG into the sanitary sewer system. If there is a FOG related problem associated with an industrial waste permit, City staff will take enforcement action against the permittee.

The City does not issue permits or inspect domestic sewage disposal to the sanitary sewer system. However, the LACO Code prohibits the discharge of “any material which may create a public nuisance, or menace to the public health or safety, or which may pollute underground or surface waters, or which may cause damage to any storm-drain channel or public or private property” (Section 20.36.010). If during inspection of the sanitary sewer system Sewer Maintenance determines that a FOG related problem exists and is traceable to a domestic sewage source of such character that is not satisfactory (Section 20.20.100), under the County Code, pretreatment could be required or the discharge required to be eliminated. Domestic waste containing FOG can lead to SSOs which are public nuisances, and California Health and Safety Code Division 5, Part 3, Chapter 6, Article 2 can also be used to impose appropriate domestic sewage discharge requirements.

PART 7.e) Authority to Inspect

As discussed in Chapter 3 of this document Culver City has the legal authority to inspect and enforce the Los Angeles County FOG ordinances. As mentioned above, the City has contracted with County Industrial Waste. County Industrial Waste has adequate staff to conduct inspections of pretreatment facilities at all permitted food establishments within Culver City through a permit program. Fees generated through the permit program fund the City FOG program.

PART 7.f) Cleaning Schedule

Experience has shown that FOG contributes to about 30% of the total number of SSOs that occur in Culver City sewer collection system. The remaining 70% is attributable to tree root intrusion into the system and other causes. As indicated in Chapter 4 of this document, FOG prone sections of the collection system are identified during routine maintenance operations and investigation of stoppages and SSOs. These are typically cleaned by hydro jetting and rodding if tree roots are encountered. Those portions of the system found to have persistent FOG problems are cleaned quarterly or more frequently if required. Furthermore, areas of the collection system with persistent FOG problems are referred to County Industrial Waste for additional investigation and enforcement actions.

PART 7.g) Source Control Measures

The County Industrial Waste program investigates and identifies the FOG blockage. Once the source is discovered, proper steps are taken to ensure SSO does not occur. Such source control measures include pretreatment systems (or a larger system) or having the grease cleaned/hailed away more often.

8.0 SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

- 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 from the system) associated with conditions similar to those causing overflow events, estimates of the capacity 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 shall include an implementation schedule and shall 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 shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D.14.

PART 8.a) System Evaluation and Capacity Assurance

Culver City's Public Works Department is staffed with engineers and technical personnel trained in proper and safe design and construction of sanitary sewer systems. The maintenance crews evaluate the pump stations and sewer lines on a weekly basis. The City's system has sufficient capacity; however, if hydraulic deficiencies are found, it is resolved immediately.

PART 8.b) Adequate Capacity and Correct Design

Title 20, Division 2 of the L.A. County Code as adopted by Culver City provides the legal responsibility for ensuring sound and functional design of the public sewer infrastructure. The L.A. County Code also forms the basis upon which sewer construction plans are designed and plan checked.

During the development process, developers must perform a study to determine the impacts of flow to be added to the system. The study will analyze the capacity in the existing system and will set forth mitigation requirements to ensure adequate capacity. The study will also justify the sizing of proposed lines to accommodate the peak flows from all areas tributary to the impacted mainline sewer or pumping station using present and estimated future flows. Permits for construction of any public sewer infrastructure are not issued until the iterative plan check process has been satisfactorily completed, thus insuring the functional design and adequate capacity of the public sewer collection system.

PART 8.c) Capacity Enhancement

Short term CIPs are in place to resolve hydraulic deficiency of pump stations within the City. The Braddock Pump Station is one that will undergo a redesign to resolve the hydraulic deficiencies with the wet well. The estimated time of design completion is December 2009 with construction starting April 2010.

Long term CIP includes replacing and maintaining sewer lines and pump stations. A sewer pump stations consolidation feasibility study has been performed and the results of the study are being evaluated. Improvements, if any, will be scheduled for the next two years. All CIP funding will come from the sewer enterprise fund.

PART 8.d) CIP Schedule

Each CIP will have its own completion date. However, due to some uncertainties, the dates may change as necessary to reflect any required changes. The SSMP will be modified accordingly to each CIP's progress and success.

9.0 MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

- 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.**

PART 9.a) Database & Record Keeping

All data and records are kept on the Maintenance Management System (MMS – MaintStar) of the Public Work's Maintenance and Operations Division. This system also generates and track work orders for the sewer crews.

PART 9.b) Implementation and Effectiveness of SSMP

Relevant data on all work done in the implementation/execution of the SSMP program shall be documented in the MMS and used in preparing Culver City monthly summary of workload indicators. These data are used in the evaluation of the effectiveness of the overall program.

PART 9.c) Assessment of Preventative Maintenance Program

The effectiveness of the program shall be monitored and tracked by Culver City Maintenance staff. The primary goal of the SSMP is the reduction/elimination of SSOs, therefore, the primary measure of effectiveness of the SSMP is the number of SSOs encountered. Other measures will be total number of category 1 and 2 SSOs, overflow response time, reduction in repeated incidents of overflow at same location and reduction in number of overflows caused by flows exceeding the capacity of the collection system including pump stations.

PART 9.d) Updates

Based on the above monitoring measures, the SSMP will be updated or modified as necessary.

PART 9.e) Trending and Analysis of SSOs

The locations of SSO occurrences are plotted annually on a district wide map or on city maps (Appendix E). The causes of the SSO are also recorded. These maps are used for establishing SSOs patterns, identifying hot spots as indicated by clusters on the maps, and for scheduling work assignments. The SSO numbers are also depicted in tables (Appendix F). The tables are used to identify SSO trends and to evaluate overall SSMP program success especially by comparing the graphs to different years and with results from other sewer agencies.

10.0 SSMP PROGRAM AUDITS

- a) 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.

PART 10.a) Program Audit

Culver City will conduct an internal audit and prepare a report every two years. The audit shall focus on evaluating the effectiveness of the SSMP and compliance with the SSMP requirements including identification of any deficiencies in the SSMP and steps to correct them. The audit shall also rely on interviews with key personnel, observations, equipment inspections and review of records, etc. The most recent report of the audit must be kept on file in the Public Works Department with a copy at the field maintenance yard.

The SSMP shall be certified by the Director of Public Works or authorized representatives to be in compliance with the requirements set forth in the WDR's and be presented to the City Council for approval at a public meeting. The Culver City authorized representative must also complete the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form and sending the signed form to

State Water Resources Control Board

Division of Water Quality
Attn: SSO Program Manager
P.O. Box 100
Sacramento, CA 95812

The SSMP must be updated every five years. When significant amendments are made to any portion or portions of the SSMP, it must be resubmitted to the City Council for approval and re-certification. The re-certification shall be in accordance with the certification process described above.

11.0 COMMUNICATION PROGRAM

- a) The Enrollee shall communicate on a regular basis with the public on 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.**
- b) The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.**

PART 11.a) Communication

Culver City will provide all stakeholders and interested parties with status updates on the development and implementation of the SSMP and consider comments made by them. Culver City may use media such as, annual reports, notices in newspapers, and the City's web site to convey this information.

Copies of the SSMP will be maintained in Culver City City Hall and in the Culver City Maintenance Facility. The document will also be made readily available to Regional Water Quality Control Board representatives upon request and to the operators of any collection system or treatment facility downstream of Culver City's system.

PART 11.b) Tributary & Satellite Communication

The City has a contract with the City of Los Angeles. Both cities update one another with new projects and maintenance.

City Authorized Representative:

Charles D. Herbertson
Public Works Director/City Engineer

Signature_____
Date

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1 2006-0003-Statewide General Waste Discharge Requirements for Sanitary Sewer Systems.

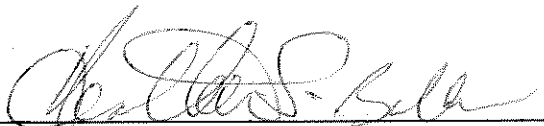
2 APPROVED and ADOPTED this _____ day of _____, 2009.

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5 _____
6 ANDY WEISSMAN, MAYOR
City of Culver City, California

7
8 ATTEST:

9 APPROVED AS TO FORM:

10 _____
11 MARTIN R. COLE, City Clerk
A09-00271

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13 _____
14 CAROL A. SCHWAB, City Attorney
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