SEWER SYSTEM MANAGEMENT PLAN

(SSMP)

for the

Laguna County Sanitation District

Board of Directors Approval Date:

July 15, 2025

to comply with Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ

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ELEMENT 1 - SEWER SYSTEM MANAGEMENT PLAN GOAL AND INTRODUCTION

The Laguna County Sanitation District is a county sanitation district formed in December 1958 pursuant to the provisions of Health & Safety Code Section 4700 et seq. The County of Santa Barbara Board of Supervisors acts as its ex-officio board of directors. The district serves the unincorporated community of Orcutt, unincorporated Santa Maria, as well as certain areas within the Santa Maria city limits.

The district has approximately 131 miles of sewer system, 21 miles of which are trunk sewers. The sewer system ranges in date of installation from 1905 (Orcutt Sanitary District) to the present. The majority of the collection system is located within public roads although some of the system is located in easements including some that is adjacent to or crossing drainage ways.

This Sewer System Management Plan (SSMP) is intended to describe measures for implementation that will formally manage the district's sewer system under the State of California's *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems* (Order 2022-0103-DWQ) adopted by the State Water Resources Control Board December 6, 2022. This Order replaces the original Order (Order 2006-0003) adopted May 2, 2006 and any amendments thereafter.

1.1 Regulatory Context

The sewer system management program generally consists of the use of several tools and carrying out several activities. These include:

a) Collection system map - The collection system map is a compilation of engineering drawing showing the sewer system as a whole. It is updated periodically to add new systems installed by development or through district improvement projects.

b) O&M activities – The sewer system field maintenance team consists of five personnel (four workers and one lead). Routine activities by the maintenance workers include the flushing of sewer lines with a goal of cleaning the entire sewer system every two years. Routine priority maintenance areas are cleaned on a more frequent basis such as monthly, quarterly, or biannually. Siphons are maintained quarterly. Off-site manholes that are not accessible by vehicle are spot checked periodically. Lift stations are checked daily. Pipe cleaning and overflow responses are tracked as performance measures. CCTV video inspection to assess system condition is also tracked as a performance measure with a goal of about 13.1 miles per year.

c) Rehabilitation and replacement plan – The district owned collection system is comprised of approximately 131.34 miles of pipeline. Some portions are from three older sanitary districts absorbed by Laguna County Sanitation District. However, the majority of the system has been constructed since 1959. Maintenance worker personnel generally follow cleaning with video inspection in order to facilitate a condition assessment of the sewer system. The list of inspected pipelines grows with each effort and is prioritized based on integrity evaluation. The list is prepared annually and used to derive scopes of

work and cost estimates to generate a capital improvement program (CIP) for significant repair or replacement projects. Minor repairs are funded through the district's annual budget while significant projects such as large lining projects are budgeted and planned for specific years.

d) Training program – Plant operator and field maintenance worker personnel have been field trained in the use of sewer system maintenance equipment. In addition, safety training such as confined space entry, blood borne pathogens, CPR/first aid, traffic control, and hazardous communications is required. Certification of collection system maintenance personnel as collection system operators through the California Water Environment Association (CWEA) is encouraged.

e) Equipment and replacement parts – Sewer system maintenance equipment used by the district includes two jetter/vacuum trucks, a jetter trailer, an easement machine, video truck with reel and push cameras. Maintenance of these pieces of equipment is scheduled in the district's work order program. In the event essential equipment is not available, the district provides and receives backup from collection staff with the City of Santa Maria Public Works Department. Back up parts are available for lift stations.

f) Root program – The current practice of routine cleaning effective in removing roots. Critical trunk lines have or will be lined, which is believed to prevent root intrusion at pipe joints. Additionally, a select number of pipes deemed high priority based on history of root issues are more frequently cleaned and removed using root cutting tools. Manhole inspections and manhole lining in key areas is also ongoing to address root intrusion at manhole structures. Root treatment with chemical foaming agents were historically completed by the district and may be considered in the future.

g) Manhole level sensors – Manhole level sensors are installed in key locations. The sensors are designed to alert a stand-by district operator in the event of sewer beginning to back up into the shaft of a manhole. The goal is to eliminate the SSO occurrences by responding to an alarm when the water level exceeds normal flow depth. Periodic maintenance and tests are performed to these sensors to ensure functionality.

1.2 Sewer System Management Plan Update Schedule

The schedule for SSMP updates and audit preparation is as follows:

a) This SSMP updates the one last approved October 11, 2022, which was transferred for coverage under the new WDR on June 5, 2023. This SSMP is due for approval by August 2, 2025. Future updates are required by the current WDR to be every 6 years after that.

b) Audits are completed annually on a July 1 through June 30 basis. The audits include completed maintenance and capital improvement activities, as well as scheduled capital improvement activities such as pipelines and manholes to be repaired, replaced, or rehabilitated as a result of CCTV inspections.

c) A new hydro jetter/vacuum truck is on order to replace the older of the two currently in possession. Replacement of this equipment is approximately every 10 years.

1.3 Sewer System Asset Overview

Laguna County Sanitation District is located in the northern coastal area of Santa Barbara County. It serves the unincorporated community of Orcutt, developed southern portions of unincorporated Santa Maria, and certain areas in the Santa Maria city limits. Its service area as recognized by the Santa Barbara Local Area Formation Commission (LAFCO) is approximately 16 square miles. Its sphere of influence extends into the southern part of Santa Maria Public Airport District property. The County of Santa Barbara Surveyor's Office maintains LAFCO maps. This map has been submitted electronically to the SWRCB.

The population served is approximately 35,000 with approximately 13,180 connections. The area served is primarily a bedroom community with conventional retail, professional, and business commercial customers. Approximately 97% of the customers are residential. There are no industrial customers.

The sanitary sewer system map is kept up to date and is housed on ESRI using ArcGIS tools for GIS capabilities. The map shows gravity lines, manholes, cleanouts, force mains with valves, lift stations, proximity to stormwater conveyance facilities and the LAFCO service territory. The terrain is relatively flat with a gentle land gradient to the northwest, where the reclamation plant is located. Some portions of the trunk line and main lines systems are located in non-road rights of way in offsite easements with more difficult to access areas.

System data is in the table below:

Miles of gravity trunk lines	21.30
Miles of gravity sewer mains	107.48
Miles of force main	2.35
Miles of inverted siphons	0.21
Total miles of all sewer lines	131.34
Number of siphons	7
Number of lift stations	2

There are no structures diverting stormwater to the sewer system. On site facilities at the wastewater reclamation plant do divert stormwater to the treatment processes or to separate holding basins.

Data management systems include software such as Granite NET by CUES for CCTV inspections. Private development submits CCTV inspections prior to acceptance in any format approved by the District. System repair and maintenance scheduling is tracked on an Excel spreadsheet. Annually a repair priority list is updated with certain capital repairs included in a CIP.

Laguna County Sanitation District holds ownership of all facilities described above. Laterals (upper and lower sections) serving customers from building structures to the wye connection on the public pipeline is owned and maintained by the property owner as defined in Sections 2.01 and 3.20 of the *Laguna County Sanitation District Engineering Design Standards for the Construction of Sanitary Sewers* last adopted January 28, 2020 and per Section 27-27.1(b) of the *Santa Barbara County Code*.

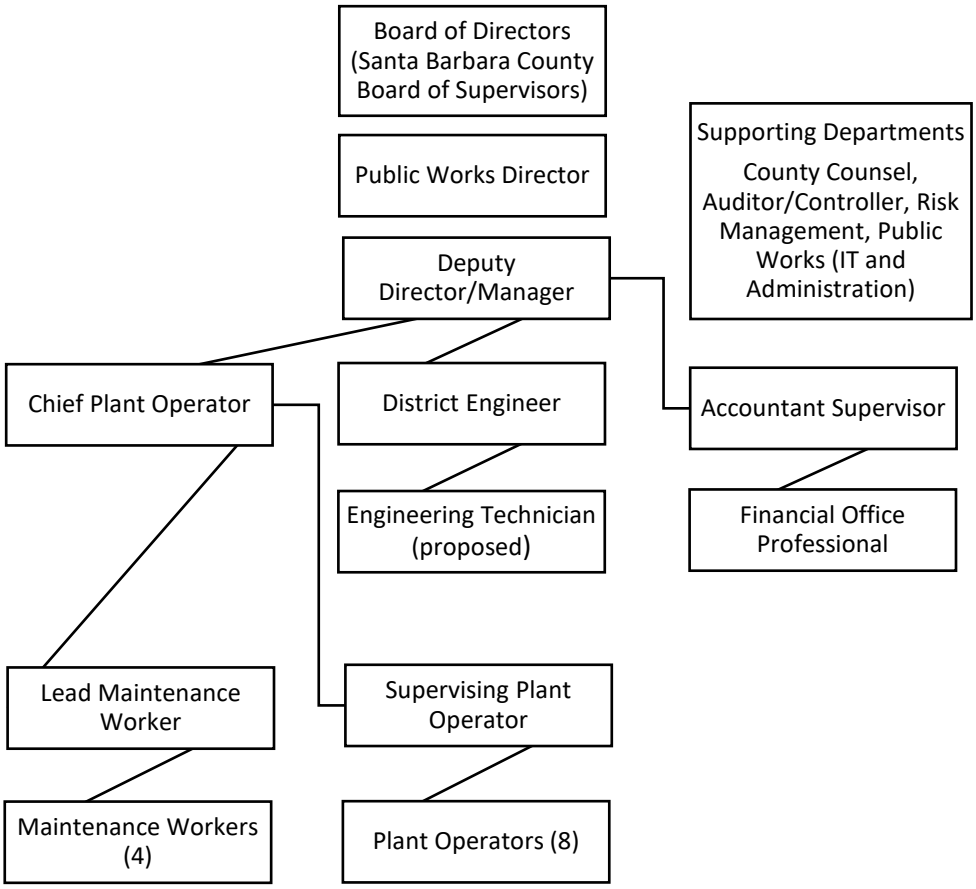
A unique service boundary condition exists in an area between Laguna County Sanitation District and the City of Santa Maria where the US Army had constructed a wastewater treatment plant to serve the then Lompoc-Santa Maria Army Air Corps Base. The system grew to service areas outside the base property when the military left the facility to the County of Santa Barbara. This system eventually become operated by the Santa Maria Public Airport District, who decommissioned it in 1977. Certain areas that utilized that plant were under the jurisdiction of Santa Barbara County but was absorbed by Laguna County Sanitation District. At decommissioning, some of the flow in the district's service area was conveyed to the City of Santa Maria WWTP while some of the flow from city customers went to the district's WWRP. The terms of this arrangement are per a joint powers agreement between the district and the city. The district has plans to construct a lift station and pipeline systems to convey wastewater flow currently flowing to the city WWTP through district pipelines to the district's WWTP. City flows to the district's plant already connect to district trunk pipelines, however, the quitclaim of short mainline sections may be required.

As an enterprise fund, Laguna County Sanitation District incorporates into its budget derived from sewer charges billed to its customers, adequate amounts for personnel salaries, standby and overtime; equipment operation, maintenance, and replacement; tools; consumable materials and supplies; training; and educational opportunities to meet the goals of this SSMP.

Changes reflected in this SSMP from the prior SSMP include system cleaning in a two year period, completion of significant trunk sewer liner projects, and addition of a lead sewer system maintenance worker.

ELEMENT 2 - ORGANIZATION

The organization structure of the Laguna County Sanitation District is shown in the chart below:



The staff involved with implementation of the SSMP are as follows:

Deputy Director/General Manager – acts as Legally Responsible Official. Delegates all elements of the requirements of the SSMP to district staff. Supports the Chief Plant Operator for writing overflow reports during spill emergencies. Trains staff of elements in the General Order. Is in charge of preparing the SSMP to be adopted by the Board of Directors. Facilitates the budget for maintenance and CIP for the sewer system.

District Engineer and Engineering Technician – act to prepare, amend, update, review elements of the SSMP, prepare audits and develop maintenance and repair priority lists, as well as maintain the sewer system CIP by developing plans and specifications and inspecting contractors perform planned district CIP as well as developer related projects such as new housing tracts involving new sewer pipelines and connections. These positions are also Data Submitters particularly for the sanitary sewer system annual report.

The Engineering Technician is a proposed position for FY 2025-2026 and is not yet filled but will also carry out inspection of new developer constructed sewer systems and other duties as assigned by the District Engineer.

Chief Plant Operator – acts to oversee and direct the routine maintenance activities such as cleaning and CCTV inspections, callout response, and is also a Data Submitter, particularly for overflow reports and reports of no overflows. This position also monitors the FOG program and submits callout response reports to State OES and other agencies as may be required such as RWQCB, and County EHS.

Lead Maintenance Worker – acts to carry out planned routine maintenance, CCTV inspections and minor repairs. Monitors manhole level and flow sensors located at key locations. Tracks and reports to the Chief Plant Operator performance measures for competing cleaning and CCTV inspection activities. May be assigned similar duties by the Chief Plant Operator as the District Engineer and Engineering Technician. Works with and directs the other Maintenance Workers to perform equipment maintenance, tool and parts acquisitions. All Maintenance Workers perform routine maintenance and repair activities and also rotate on standby for emergency callouts that may occur after hours. It is noted that plant operator staff maintain commercial driver licenses in order to aid in response as the operator on standby is usually the first person contacted by the Maintenance Worker on standby. The Maintenance Workers collect the data for SSO reports for submittal by the Chief Plant Operator. The plant operators are trained to respond to collection system callouts if needed but are not primarily called upon.

Accountant Supervisor and Financial Office Professional – Aid with the budget for the collection system and payment for supplies, vendors, and equipment.

SSMP Related Staff List:

Position Title	Staff	Phone	Email
Deputy Director/General Manager	Martin Wilder, P.E.	(805) 803-8755	mwilder@countyofsb.org
District Engineer	Kevin Thompson, P.E.	(805) 803-8756	kethomp@countyofsb.org
Engineering Technician	proposed		
Chief Plant Operator	Jerry Nichols, GR IV WWPO	(805) 934-6281	jenichl@countyofsb.org
Lead Maintenance Worker	Billy Mann, Gr 2 CWEA	(805) 934-6282	willmann@countyofsb.org
Maintenance Worker	Javier Yepez		jyarroyo@countyofsb.org
Maintenance Worker	Cleve Jones		cljones@countyofsb.org
Maintenance Worker	Eddie Lucio		elucio@countyofsb.org
Maintenance Worker	Eduardo Lopez		edulopez@countyofsb.org

ELEMENT 3 – LEGAL AUTHORITY

The Laguna County Sanitation District has adopted a sewer use ordinance as written into Chapter 29 of the Santa Barbara County Code. Article I pertains to general topics and Article III

specifically pertains to discharge into the Laguna County Sanitation District treatment system. Article II pertains to on-site sewage disposal systems and is administered by a separate administrative authority within the County of Santa Barbara. In addition, the district has other powers related to sewer systems pursuant to the county sanitation district act as described in Sections 4738-4767 of the Health & Safety Code. Development and design must comply with *Engineering Design Standards for the Construction of Sanitary Sewers* as adopted by the district board. These documents have been updated for better enforcement capabilities. Staff is familiar with the steps required to amend ordinances and has done so to update, revise and clarify ordinances and standards.

a) The authority to prevent illicit discharges into the collection is found in Sections 29-2, 29-4, 29-5, 29-26 and 29-27 of the County Code.

b) The authority to require sewers and connections to be properly designed and constructed is found in Sections 29-3, 29-7, 29-27, 29-31, and 29-32 of the County Code, the district's *Engineering Design Standards for the Construction of Sanitary Sewers*, and per applicable sections of the California Plumbing Code.

c) The authority to ensure access for maintenance, inspection, and repairs of the publicly owned sewer system is found in Sections 29-23 and 29-35 of the County Code as well as in the district's *Engineering Design Standards for the Construction of Sanitary Sewers.* All laterals extending from a structure to the sewer main are privately owned and maintained per Section 29-27.1 of the County Code.

d) The authority to specifically limit the discharge of fats, oils, and grease is found in Section 29-27 of the County Code.

e) The authority to enforce violations of the sewer use ordinances and to administer penalties is found in Sections 29-22, and 29-24 of the County Code.

The district, being internal to the County Public Works Department, has access to Transportation Division Maintenance staff to collaborate on SSO responses as they may interact with storm drain systems. This is true for storm drain facilities owned and maintained by the Santa Barbara County Flood Control and Water Conservation District.

ELEMENT 4 – OPERATION AND MAINTENANCE PROGRAM

4.1 Updated Map of Sanitary Sewer System

An atlas map of the sanitary system is a compilation of engineering drawings used to construct the trunk lines, new main line systems installed by developers, and any constructed improvements. It has been improved over time due to technology advancements. Today, it is available for access through GIS software and mapping tools. The map is updated periodically to add new systems installed by development, identify current improvements, and correct inaccuracies. In addition to showing pipe and facility information, it shows colored aerial

topographic detail and location information and is maintained in both hard copy and electronic formats. The record drawings for developer and district improvements (engineering drawings) showing plan, profile, slope and other information are kept on file. The atlas maps as well as general "project area" maps are used for maintenance staff to manage work activities and track work progress. Daily activities are recorded on log sheets kept at the plant and weekly copies at the offices. This information is periodically entered into a database file at the office. Electronic mapping using ArcGIS software is kept on a computer network and is accessible from a GIS/Autodesk computer at the office and can also be viewed online on any device with internet access such as a tablet or cell phone. The system has been numbered to identify manholes, cleanouts and pipe segments. Observed discrepancies in the maps by field personnel can be submitted to the office for correction. Each page shows includes a date of print or last revised date stamp. To determine potential sewer overflow direction and containment, a storm drain atlas map is also used and updated periodically.

4.2 Preventative Operation and Maintenance Activities

It is the goal to proactively clean the entire part of the accessible portion of the sewer system once in a two year period. Manholes are inspected when opened for pipe cleaning. Areas with limited access for large vehicles are visually inspected. It is the goal to perform CCTV inspection of the accessible portions of the sewer system at a rate of approximately 13.1 miles per year, or once every 10 years. Two teams of two or three perform either cleaning or CCTV activities.

Routine high frequency maintenance areas of the sewer system may be prone to issues due to root intrusion, have flat slopes, siphons, subject to grease of debris accumulation, or irregular flow characteristics require more frequent attention. System cleaning or inspection for these areas is programmed either monthly, quarterly, or biannually. Pipe cleaning, CCTV inspection and callouts/responses are tracked as performance measures. Lift stations are checked daily.

Cleaning effort of the system is broken down into several areas or zones. Work begins in the upstream areas and progresses downstream. Information is collected on log sheets and transposed into a spreadsheet. ESRI software is used map cleaning and CCTV progress as well as to schedule proposed repairs. An annual priority list for repairs or maintenance modifications is generated during the annual audit. The list tracks completed work, an updates priority based on a needs assessment.

4.3 Training

Operator and maintenance worker personnel have been field trained in the use of sewer system maintenance equipment. In addition, safety training such as confined space entry, blood borne pathogens, CPR/first aid, traffic control, and hazardous communications is required. SSO drills are performed annually that includes methods for clearing clogs, methods for estimating volumes, methods for capture and recovery, use of measuring equipment, required documentation, and response needs assessment. Certification of collection system maintenance personnel as collection system operators through the California Water

Environment Association (CWEA) is encouraged with additional compensation. Sewer collection staff are also familiar with the SSMP and Spill Emergency Response Plan. SOPs are generated for specific issues, i.e., sensitive or gas prone manholes, special access instructions, etc.

4.4 Equipment Inventory

Sewer system maintenance equipment used by the district includes two jetter/vacuum trucks, a jetter trailer, an easement machine, video truck and push camera. Maintenance of these pieces of equipment is scheduled in the district's work order program. In the event essential equipment is not available, the district provides and receives backup from collection staff with the City of Santa Maria Public Works Department. Back up parts are available for lift stations. Approximately thirteen MH level monitors, SmartCovers, are used at strategic locations to give off alarms for high levels. These are monitored on an internet web page and communicate via satellite.

ELEMENT 5 – DESIGN AND PEFORMANCE PROVISIONS

This element addresses design criteria and construction standards and specifications for the construction of proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. Sewer service and other development requirements such as annexation through LAFCO are also addressed.

5.1 Updated Design Criteria and Construction Standards and Specifications

The district's *Engineering Design Standards for the Construction of Sanitary Sewers* was last approved by its board January 28, 2020. This document is periodically updated and readopted and addresses design and construction criteria for new sewer pipelines, manholes, and appurtenances to be installed by developers. These systems are plan checked, inspected, and tested prior to acceptance.

5.2 Procedures and Standards

Procedures include periodic construction inspection (location depth, etc.), soil compaction testing, cleaning, mandrel pull testing, pressure testing, and CCTV submittal review and approval. The startup testing on mechanical equipment such as lift stations is also required. The acceptance is new system is subject to meeting design standards such as minimum hydraulic capacity, depth to diameter ratios, flow velocity and performance standards such as minimum pump gpm rates and pipe integrity.

ELEMENT 6 – SPILL EMERGENCY RESPONSE PLAN

Laguna County Sanitation District has prepared a Spill Emergency Response Plan overflow emergency response plan included as Appendix A that:

a) Includes notification procedures that alerts responders and appropriate regulatory authorities within the appropriate time frames.

b) Provides for notification to other potentially affected parties such as storm drain operators, Flood Control District, other utility entities, etc.

c) Complies with notification, monitoring and reporting requirements of the SSMP General Order, other state laws, and regulatory criteria.

d) Ensures that staff and contractor personnel are appropriately trained to respond to an overflow and aware of the Spill Emergency Response Plan procedures.

e) Addresses emergency operations public safety elements such as traffic control, crowd control, securing the work area, etc.

f) Ensures that reasonable steps are taken for overflow containment, stop or prevent discharge to water courses, correct and mitigate impacts to the environment, and monitor overflow effects.

g) Minimizes and remediate public health risks and beneficial uses of an affected water body or area.

h) Removes sewage from the ground or drainage system.

i) Addresses the cleaning of a spill area or affected drainage system in a way that does not further impact beneficial uses of a water body.

j) Expedites containment and recovery by using acceptable technologies, practices, standards, equipment, and any interagency coordination that may be useful.

k) Has planned for coordination with storm drain agencies, other utility agencies, and emergency response agencies.

l) Addresses after action review assessments.

m) Documents and reports SSO events as required by this Order.

n) Provides for annual assessments on the effectiveness of the Spill Emergency Response Plan and derive updates as needed.

ELEMENT 7 - SEWER PIPE BLACKAGE CONTROL PROGRAM

This element addresses mechanisms intended to keep objects out of the sewer system that can cause sewer line blockages. One of the main causes is the deposition of fats, oils, and grease (FOG) which originates mainly from cooking but can also originate from other sources. The majority of Laguna County Sanitation District customers are residential with approximately 13,180 connections. Of the approximately 372 commercial customers, 40 are restaurants or other food service establishments. FOG control measures such as grease control devices and

inspections of applicable commercial facilities including food service establishments, schools, rest homes, car washes, churches, veterinarian offices, and penitentiaries are in place. Industrial permits are in place for two breweries and commercial swimming pools (effect of dissolved solids on reverse osmosis facilities) for periodic self-monitoring of effluent water constituents and pre-treatment requirements if necessary.

The federal Clean Water Act requires a formal Pretreatment Program pursuant to 40 CFR 403.8 for Publicly Owned Treatment Works (POTWs) with design flows greater than 5 mgd and receiving wastewater from industrial users discharging pollutants which pass through or interfere with the POTW or as may otherwise be subject to pretreatment standards. The district's current design capacity is 3.7 mgd and there are no industrial customers. However, pretreatment to control fats, oils, and grease is required in the form of a source control program when these substances are determined to cause operational problems. Regulated facilities per Section 1014.0 of the California Plumbing Code (CPC) include commercial food service establishments. Grease control is not mandatory for residential dwelling units. The district's FOG source control program is intended to:

a) Provide for public outreach and education on the proper techniques for FOG disposal. Fliers are included with annual mail outs and door hangers are distributed in areas where grease discharges appear excessive. Commercial establishments involved with food services have been contacted and are routinely inspected for compliance with FOG source control measures. This inspection and compliance program is ongoing.

b) Address the collection and disposal of fats, oil and grease. The proper disposal of these materials involves the collection of the objectionable material from traps and interceptors by contractors and transported to a facility that accepts this waste. Collection and inspections of traps and interceptors is based on a schedule for each facility to ensure that these facilities are properly operated and maintained. A list of contractors and facilities that accept grease can be found at calfog.org.

c) Demonstrate legal authority to prohibit FOG discharges and identify measures to prevent FOG caused blockages. Section 29-26 of the County Code prohibits the discharge of fats, oil, and grease exceeding concentrations of 100 mg/l. Measures to prevent FOG discharges include implementing the control program with appropriate commercial dischargers, managing and tracking the control program, and educating residential customers on the FOG program. Preventative maintenance of the sewer system is another measure to prevent grease related blockages.

d) Require the use of grease removal devices for certain dischargers. Section 29-27 of the County Code authorizes the district to require grease interceptors and requires the discharger to maintain interceptor equipment. Section 29-28 authorizes the district to require discharge reports and Section 29-28 authorizes the district to require waste discharge permits for users discharging waste described in Section 29-26, which includes

FOG discharges. Best management practices (BMPs) for FOG dischargers is provided by site inspectors. District staff or its consultants maintain records and reporting documentation.

e) Provide for the authority to inspect facilities and premises where FOG is generated. This authority is described in Section 29-35 of the County Code. Enforcement and penalties are described in Section 29-24. The district has hired a consultant to conduct the FOG source control program.

f) Identify locations in the sewer system that have excessive discharges of grease or are subject to grease accumulation. These locations are placed on a more frequent maintenance schedule.

g) Develop and implement source control measures. Because any sewer connection has the potential to contribute FOG, notification describing the FOG program is distributed to all customers through mailers annually. Verbal and written communication is provided through site inspections and enforcement actions to all applicable commercial customers. Maintenance activities and effectiveness of the FOG source control program is tracked.

Modifications or additions to current ordinances may be proposed from time to time to further implement a more effective FOG source control program.

ELEMENT 8 – SYSTEM EVALUATION, CAPACITY ASSURANCE AND CAPITAL IMPROVEMENTS

The intent of this element is to address sewer overflows that may result from inadequate sewer system capacity. When designing a sewer system, the peak flow must be determined in order to properly size the pipe system. Flow contributions from existing and proposed development in addition to estimated rain driven infiltration and inflow (RDI/I) and groundwater infiltration (GWI) are used to evaluate pipe system capacity. Comparison of service areas, as planned in 1959, appears to include much of the current community plan development overlay, but may not have addressed current development densities. In addition, design standards and land zoning designations have changed. While the district's system to date has not experienced overflows resulting from capacity limitations, evaluations indicate improvement may be necessary in certain locations. A flow model of the entire system was prepared using Sewer GEMS software to assess system capacity. This analysis is periodically updated to reflect changes to wastewater generation rates, proposed development, or changes to development densities. The model evaluates where conveyance deficiencies exist and where deficiencies may occur as a result of development.

8.1 System Evaluation and Condition Assessment

Existing sewer system pipe line capacity deficiencies based on existing and future development are analyzed. Currently, the existing system has no capacity related deficiencies based on existing development. However, future development does pose capacity deficiencies in certain areas. Dry and wet weather flows are calibrated in the sewer model based on historical metered sewer flow data and sewer connection types and counts. Historically, it does not appear that the district sewer system experiences significant RDI/I or GWI problems, however, an overall peaking factor is experienced at the plant's main influent meter and this issue is being monitored during rain events using Smart Cover metering systems at various locations and the plant's influent meter.

Condition assessment is based on CCTV inspections. Defects are cataloged and prioritized based on severity. The annual audit is used to reprioritize the repair list. Significant findings are addressed promptly and others are scheduled in a given fiscal year or developed into a capital project.

Record Keeping. Tracking of cost, type of activity, dates, etc. is maintained in order to plan budgets, provide cost estimating data, and assess performance.

8.2 Capacity Assessment and Design Criteria

Capacity Enhancement Measures. System capacity has been analyzed. Changes in flow from proposed development is anticipated to exceed design capacity in certain areas. Planned development will be conditioned to provide its share in the cost of system improvements which upsize pipes to provide adequate capacity.

Design Criteria. Engineering criteria such as peak flow rates, minimum slope, velocity, and depth to diameter (d/D) criteria, and flow generation rates are established in the district's engineering design standards.

8.3 Prioritization of Corrective Action

Risk Assessment. Factors such as age, material, proximity to creeks, access, depth, location, terrain, defects, vulnerability to disasters, etc. are used to assess priority and importance.

To date, there do not appear to be significant influences from I/I and no SSOs have occurred due to I/I. Recent pipe lining projects and replacement of manhole frame and covers in flood prone areas with pressure tight frame and covers are expected to significantly reduce what I/I issues existed.

8.4 Capital Improvement Plan

The district has developed a list of capital improvement projects as parts of its Sewer System Capital Improvement Program (CIP). Major improvements completed to date include lining at risk trunk line areas, flow improvements, and reconstructions of sags. Certain segments of the

sewer system require upsizing as a result of proposed development, which are addressed as a condition of development.

ELEMENT 9 – MONITERING, MEASURING, PROGRAM SPECIFICATIONS

This element addresses adaptation in efforts based on trending and findings. The primary sources for monitoring data are from the SSMP audits and from cleaning and CCTV inspection performance measures. The annual priority list generated in the SSMP audit in particular shows the adaptive of repair efforts. This is because the type, magnitude and severity of system repairs may steadily decline as significant repairs are completed. Pipeline cleaning used to take three years to complete the whole system but efficiencies and experience has reduced this timeframe to two years. Cleaning more frequently in routine areas has not proven to result in spill reduction benefits. High priority pipes due to defects such as roots or sags are cleaned more frequently. These are termed high priority locations. Repair efforts are focused on high priority locations were feasible in order to remove the need for more frequent maintenance.

Cost estimation for significant repairs is kept on file. The District has prepared a Sewer System Capital Improvement Project Master Plan 2020-2030, which is used for estimating future capital repair budgeting.

Using new technology such as manhole monitoring equipment helps to see trending data, which is used to quickly react to problems. Certain manhole monitoring is tracking data to evaluate I/I.

SSMP implementation measures can result in the amendment of plan activities, planning for emergencies, measuring performance and how to correct deficiencies, add programs, or reprioritize efforts and capital planning.

Information that is tracked and compared to effectiveness in eliminating overflows include pipe cleaning, integrity evaluation, deficiency corrections, FOG control, capacity evaluation and correction, dry and rainy season flow comparisons, and using design standards for new construction. The cost associated capital repairs affect the ability to prioritize work but unless determined to be an emergency (imminent failure), these can be planned over a period of successive fiscal year budget cycles as customer sewer rates can be sensitive to the degree and scope of capital improvements.

Certain aspects of sewer overflow prevention are considered complete upon onetime implementation. These types of efforts include CCTV inspection and repair/replacement prioritization, I/I testing, and capacity evaluation. Once implemented, the effects of these programs can be compared to the number of sewer clogs, and the reduction in daily plant flows during rainfall events and high groundwater periods.

Other activities are preventative in nature and are performed or a recurring basis such as sewer pipeline cleaning and FOG source control inspections at commercial food service

establishments. Tracking of the number of miles of pipeline cleaned per year and tracking FOG control system performance is the most useful in maintaining system performance.

The effectiveness of all efforts to eliminate sewer overflows can be measured based on trending over time. Historical data shows a decrease in the number of clogs throughout the entire service territory as well as at specific locations since implementing SSMP activities. Reductions in clogs based on the cause (grease, roots, debris, pipe failure, etc.) further indicates improvement in the function of the sewer system.

ELEMENT 10 – INTERNAL AUDITS

The Laguna County Sanitation District is required under the terms of the Sanitary Sewer Systems WDR to perform periodic audits appropriate to the size of the system and the number of sewer overflows that occur. An audit is generated annually and kept on file and uploaded to CIWQS in the WDR schedule. The audit evaluates the effectiveness of the programs implemented and lists tracked performance measures during the reporting period. The audit also indicates what measures and programs have been implemented to demonstrate compliance with the SSMP, identifies completion dates, and addresses deficiencies with recommended corrections. The audit will be prepared by the engineering technician and lead system maintenance worker and reviewed by the Deputy Director/General Manager, chief plant operator, and district engineer.

Elements of the audit include a description of record keeping, evidence of staff training and familiarity with the SSMP, listing of proposed actions (number of miles cleaned, completed repair projects, CCTV miles inspected, etc.) during the audit period and whether or not those actions were completed, report of performance measures, identification of potential SSMP modifications, updating the priority repair list, and budget considerations.

ELEMENT 11 – COMMUNICATION PROGRAM

Customers are informed of the development, implementation, and performance of the SSMP by flier that includes the district's annual rate setting notice. The SSMP, capacity model study, and engineering design standards are posted on the district's website.

SSO notification to the public, depending upon severity, may include door hangers, posts on social media by the County Public Works Public Information Officer, communication with affected parties, the County Environmental Health Services office, storm drain agencies, emergency response agencies, environmental resource agencies, and neighboring sewer providing agencies.

Significant sewer system capital improvements are included in each published annual budget.

APPENDIX A - SPILL EMERGENCY RESPONSE PLAN

APPENDIX A

LAGUNA COUNTY SANITATION DISTRICT
SPILL EMERGENCY RESPONSE PLAN

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INTRODUCTION

This appendix comprises the Spill Emergency Response Plan (SERP) required by Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ per Element 6 of Attachment D, which states that the Sewer System Management Plan (SSMP) must include an up to date SERP. The SERP also addresses notification, monitoring, reporting and recordkeeping requirements pursuant to Attachment E1 of the Order. This document is intended to address activities enacted to address a spill, which is defined as a discharge of sewage from any portion of a sanitary sewer system due to an operational or infrastructure failure.

I. READINESS

Laguna County Sanitation District employs five sewer system maintenance workers, one of which is lead. The team generally works in two crews to clean of perform CCTV inspections, respond to underground service alerts for utility 811 inquiries, and perform other routine maintenance activities. Each member of the team is familiar with the sewer system and is trained to respond to sewer system emergencies of various types including spills. Periodic emergency callout drills are performed and each member is encouraged to complete California Water Environment Association collection system maintenance certification. Collection system workers rotate being on standby for non-working hours. Plant operator staff are also trained to drive or dispatch equipment and personnel to respond to a spill and can assist if needed. Third party contractors are also on call for assistance, repairs, and construction needs.

Staff are trained to keep in mind the following goals during emergencies:

- Protecting district personnel.
- Providing customer service.
- Protecting private and public property.
- Protecting the collection and treatment facilities.
- Protecting public health and environment.
- Restoring service and the returning affected areas back to normal.
- Being competent in traffic control systems.
- Complying with regulatory requirements.
- Ensuring proper notification to regulatory agencies.
- Providing containment and preventing discharge to surface waters.
- Estimating sewer overflow volumes and documenting spill locations.
- Properly photographing sewer overflow events for reporting purposes.
- Limiting liability and exposure to penalties.

II. RESPONSE

Response to a spill involves the dispatch of the appropriate field staff as well as communication with other primary responders, local officials, and regulatory agencies. The initial action follows a procedure for Laguna County Sanitation District personnel to mobilize labor, equipment, materials, tools to correct or repair any condition which may cause or contribute to an unpermitted discharge. The procedure considers system failures that could spill sewage to surface waters, land, or structures. The procedure is as follows:

A. Receipt of a Report of a Spill

A spill may be detected by district employees, manhole level sensors, or by others. Sewer spills detected during working hours (daily from 6:30 am through 5:00 pm) are reported immediately to the chief plant operator or plant operator in charge either directly from a third party or from a call transferred from any staff member. Phone calls made to the office or plant, or after working hours, or if plant staff cannot be reached during working hours, are forwarded to the assigned emergency cell phone at (805) 310-2252, which are carried by personnel assigned to stand by duty for the sewer system. Additional staff may be contacted as shown on the call out list included in Attachment A, which also includes contact information for other relevant agencies. District supervisorial staff will communicate with the County Public Works Department Safety Officer for incident reporting.

The person receiving the telephone call obtains all relevant information available regarding the overflow including:

- Time and date the call or initial contact was received.
- Specific location (address, intersection, in a roadway or off site).
- Whether the spill is on public or private property.
- Description of problem (blockage, pump station failure, etc.).
- Time possible spill was noticed.
- Name and contact information of the caller or party making the initial contact.
- Observations of the caller (odor, duration, back or front of property).
- Potential cause.

If essential information is not readily available, an initial response crew will go to the site to complete an assessment. This information is then forwarded to the appropriate personnel for a strategic response.

B. Dispatch and Setup

Upon gathering sufficient data either from a caller or from the initial response crew, the acting supervisor will determine the appropriate staffing, materials, supplies, and equipment needed. The dispatch and setup procedures are as follows:

1. The supervisor verifies that the entire message has been received and acknowledged by the crew responding to the call.
2. The crew is dispatched to the site usually with a flushing/vacuum truck as well as a separate field vehicle.
3. The point of spill emanation is located.
4. Safety issues related to access, traffic, and spill flow pattern are evaluated.
5. Appropriate safety measures such as traffic control, cordoning off work zones, and site awareness measures (lighting needs, gas detection, etc.) are implemented.
6. For a gravity system issue, the downstream manhole is typically accessed and a cleaning or cutting nozzle is deployed upstream towards the blockage.
7. Remove the blockage.
8. For a lift station failure, typically detected by an alarm, additional response equipment or personnel may be required such as a pump truck, trash pump, generator, electrician or controls programmer.
9. For long duration responses, supervising staff will convey information to replacement staff and coordinate the replenishment of materials, equipment, and supplies.

In most cases these measures are effective in resuming flow and follow up procedures are enacted. Possible scenarios are more complicated and may involve the need for a temporary bypass. In this scenario, additional resources including contractors may be deployed to setup bypass and pumping equipment. Vendor/contractor contact information is available to staff for parties that provide these services.

C. Special Assistance

Depending upon complexity, assistance from other first responder entities may be needed such as for additional traffic control or access to storm drain systems from County Public Works Department Transportation Division, certain creek or channel access from the Flood Control District or private property owners, and possible safety assistance from sheriff, police or fire departments. Emergency contact information for these parties is available to district personnel.

D. Containment, Recovery and Cleanup

Because the best way to reduce impacts to the environment is to stop the spill as soon as possible, containment may occur after that has been achieved. However, in certain

circumstances, additional staff may initiate containment measures simultaneously with blockage removal efforts such as:

1. Using dirt berms, fiber rolls, sand bags hay bales, etc. to divert flow on the ground surface.
2. Blocking storm drain facilities and vacuuming at the furthest point of travel.
3. Employ measures to prevent or minimize discharge to waters of the state. Such measures may include blocking creek flow, placing transfer pumps, using special retrieval equipment, etc., particularly for a moving body of water.

Sewage that has settled in low lying areas, has traveled down road curbs, entered storm drain inlets or over side drains, particularly with the potential to eventually reach drainage channels that connect to surface waters or waters of the state will be recovered either simultaneously with blockage removal efforts or immediately after sewer system function has resumed. These procedures include:

1. The use of a flushing/vacuum truck to collect sewage on the ground.
2. Using a conventional pump truck (as opposed to a flushing/vacuum truck) with hose extensions to collect sewage from areas with limited access.
3. Accessing an affected storm drain system and vacuuming sewage at the furthest point of travel.

Once all or sewage, or as much as possible, has been recovered, cleanup procedures that include the following are employed:

1. Flush ground surface or drainage system with water and vacuum wash water. This may require vacuum efforts at multiple points (storm drain manholes or inlets) from the furthest point of travel to the entrance location.
2. Certain areas not subject to flowing the surface waters may be sprinkled with pool grade granular chlorine and flushed.
3. Collection of visible debris using rakes or other tools for proper disposal.
4. Removal and disposal of used containment fixtures.
5. If directed by County health officials, install signing indicating a possible health risk due to a sewage spill for a given period of time.
6. Follow water or soil testing guidelines.

E. Contact Affected Entities

Simultaneously with spill containment and recovery, other staff may contact entities affected by a spill (if any) are notified of risk for exposure or danger and include parties such as homeowner associations, business and residential land owners, utility companies, and storm drain system owners.

Certain circumstances may require notification to local officials and public alerts. In this case district management would contact County executive officials and the Public Works Department public information officer would provide communication to news outlets and posting on social media.

Direct communication with regulatory authorities such as the County Health Department Environmental Health Services office, natural resource agencies (United States Fish and Wildlife Service, California Department of Fish and Wildlife), and Regional Water Quality Control Board may also be needed if input and direction regarding a spill response is necessary.

Normal notification to regulatory agencies such as the Regional Water Quality Control Board through the California Office of Emergency Services is completed in a timely manner occurs as part of follow up procedures related to reporting.

F. Preliminary Inspection for Damage to Public and Private Property

District facilities, facilities owned by other public or private utility agencies, storm drain owners, homeowner associations, building owners or tenants, etc., can be affected by a spill. Impacts must be assessed and corrected. An inspection includes the following:

- Assessment of an immediate threat to health and property. District staff may assist to remediate the problem with other responding entities that may be on site, such as the property owner's plumber, only to the extent such action will resolve the unsafe condition faster and in a more professional manner. District staff must use discretion in assisting the property owner or occupant as reasonably as possible as Laguna County Sanitation District must limit its liability for any further damages inflicted to private property during such assistance. Staff must make precautionary disclaimers and document staff names, equipment used and time allotted for billing back a private party if warranted.

- Gathering information that may disclose the possible cause of a spill from connected facilities and structures, i.e., was a backwater device required and if so was it functioning, type of discharge (excessive or prohibited waste), and customer activity (was a plumber cleaning or repairing a pipe). Photographs and/or video footage, when possible are taken of the impacted area of the spill on private property in order to thoroughly document the nature and extent of impacts.

- Communication with the property owner or occupant. Document statements from third parties. Limit conversation to the facts. Referral to the County Risk Manager's office may be required for cleaning company contacts, accommodation needs, and communication with the property owner's insurance company.

G. Coordination with Hazardous Material Response

Hazardous materials can be found in excavated soil, be released in a traffic accident, or be illicitly deposited in or near a sewer facility. Should a suspicious substance (e.g., oil sheen, foamy residue) be found, or should a suspicious odor that is not common to the sewer system (e.g., gasoline) be detected at the scene of a spill, the investigator or response crew must immediately contact the supervisor for guidance before taking further action.

Should the supervisor, County Safety Officer, or other qualified party determine or suspect that the site has been contaminated by a hazardous material, the appropriate response organization will be contacted. The usual response organizations include the Santa Barbara County Fire Department, a hazardous material recovery contractor on retainer to the County of Santa Barbara Public Works Department, or other party as directed. Sewer overflow response personnel will secure the area and wait for the arrival of the hazardous material response team to take over the scene. **It is noted that any vehicle engine, portable pump or open flame (e.g., cigarette lighter) can provide the ignition for an explosion or fire should flammable fluids or vapors be present. Safe distances and precautionary practices will be adhered to until assistance arrives.**

Upon arrival of the County Fire Department or other authorized hazardous material response organization, the sewer investigator or crew takes direction from the person with the lead authority of that team. Only when that hazardous material authority determines it is safe and appropriate for the sewer investigator and sewer maintenance crew to proceed can they address the sewer overflow.

The procedure for contacting the appropriate response personnel will generally be initiated by calling 911 to reach law enforcement, hazardous material, fire, and medical responders. Specific contact information for certain relevant entities is given in the following:

HAZARDOUS MATERIAL EMERGENCY RESPONSE

Santa Barbara County Fire Department:
- Hazardous Materials Response Team (805) 686-5062
  - Buellton Fire Station No. 31
- Medical or fire response
  - Orcutt Fire Station No. 21 (805) 934-6292

Santa Barbara County Public Health Department Environmental Health Services office:
- Certified Unified Program Agency (CUPA) (805) 681-4927

CUPA will generally notify other federal, state and local agencies that may be involved due to the extent of the hazardous material incident. This may include law enforcement, environmental resource agencies, medical facilities, or other emergency related agencies.

HAZARDOUS MATERIAL RECOVERY RESPONSE

Overflow Recovery Team	
Pacific Petroleum California, Inc.	(805) 925-1947
Public Works Department Safety Officers	(805) 568-3307 SB office
	(805) 729-1956 Cellular
	(805) 803-8768 SM office
	(805) 951-0902 Cellular

Reporting to Certified Unified Program Agency (CUPA) is pursuant to the Release Reporting Guidelines included as Attachment B.

III. Notification, Monitoring, Reporting, and Recordkeeping Requirements

Statewide Sanitary Systems General Order 2022-0103-DWQ defines the classifications of spills and implements notification, monitoring, reporting, and record keeping requirements consistent with Water Code Sections 13267 and 13383. Spill specific information to be documented includes contact information, cause, estimated loss volume, and factors used for estimation, location, date, time, duration, amount discharged to waters of the State, as well as response and corrective actions taken. Use the Field Spill Report, Attachment C, to gather known information as soon as it is safe to do so. Several methods may be used to estimate spill rates. One aid includes visual rate comparisons emanating for overflowing manholes in Attachment D.

The notification, monitoring and reporting requirements differ by spill category and volume. The spill categories are defined as follows:

Category 1 Spill

A spill of any volume of sewage from or caused by a sanitary sewer system that results in a discharge to:

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

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

Category 2 Spill

A spill of 1,000 gallons or greater, from or caused by a sanitary sewer system that does not discharge to a surface water.

A spill of 1,000 gallons or greater that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system.

Category 3 Spill

A spill of 50 gallons or more but less than 1,000 gallons, from or caused by a sanitary sewer system that does not discharge to a surface water.

A spill of 50 gallons or more but less than 1,000 gallons, that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system.

Category 4 Spill

A spill of less than 50 gallons, from or caused by a sanitary sewer system that does not discharge to a surface water.

A spill of less than 50 gallons that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system.

Notification, monitoring, and reporting requirements for various spill scenarios are summarized in the following tables:

Category 1 Spills ≥ 1,000 Gallons

Notification	Call the California Office of Emergency Services (CalOES) at (800) 852-7550 and obtain a notification control number within two (2) hours of becoming aware of the spill. Provide the following information: • Name and phone number of caller and agency. • Provide date and time when informed. • Indicate event circumstances and cause. • Location (address, cross street, etc.). • Indicate if water body affected. • Estimation of the spill volume and rate. Make additional calls to CalOES to provide updates to changes in information, if needed.
Monitoring	Acquire specific data for reporting: • Note spill origin (MH or pipe number), location, spread, and extent (using pictures, GPS, street addresses or intersections, etc.). • Note receiving area or facility (ground surface, roadway, drain system, creek – note if dry or flowing). • Note cleanup areas (pictures, GPS). • Estimate spill volume using estimation techniques, calculations, measurements, equipment, or tools). Update as necessary. • Estimate volume recovery. Update as necessary. • Estimate travel time to the receiving water, velocity, flow rate. If entering a conveyance system (drain pipe system), estimate travel time to the receiving water, velocity, flow rate separately from exposed travel. • Document and photograph impact to creek banks, floating matter, surface sheen, discoloration, and observed impacts to the water body. Sampling: If ≥ 50,000 gallons, collect water samples within eighteen (18) hours of the spill at these locations: • A point in a drainage conveyance system, prior to entering a receiving water. • A point at water body entrance. • A point upstream of the point of water body entrance. • A point in the receiving water downstream of water body entrance where full mixing occurs. Obtain samples for each day of spill duration.

	Test for ammonia, total coliform, fecal coliform, E-coli, enterococcus, as well as additional parameters as may be directed (i.e., TDS, chlorine residual, BOD, SS). If dry creek bed, indicate no sampling due to no flow. Collect samples only if safe to do so.
Reporting	Timelines for reporting: Submit draft spill report on CIWQS within three (3) business days for any Category 1 spill. Include at minimum (additional information as required for the certified spill report may also be included): 1. Name and phone number of submitter. 2. Spill location name. 3. Date and time of awareness of spill. 4. Time of arrival at the site. 5. Estimated spill start date and time. 6. Date and time CalOES was notified and the assigned control number. 7. Description, pictures, and GPS data detailing spill location. 8. Estimated spill volume. 9. Description and pictures detailing extents of spill area. 10. Description and pictures of the conveyance system, entry location, estimate of spill volume recovered, and estimate of spill volume remaining. 11. Description and pictures of discharge point to the water body. 12. Estimate of spill volume discharged to the water body. 13. Estimate of total spill volume recovered. Submit certified spill report on CIWQS within fifteen (15) calendar days of the spill end date. In addition to the information provided for the draft spill report include: 1. Description, pictures, and GPS data detailing full spread and reach of the spill location (or if no change from draft report). 2. Spill end date and time. 3. Documentation as to how the estimated spill volumes were generated (methodology, calculations, flow data from SCADA, historical trending flow data, measurements, flow rates, start and stop times, etc.). 4. Cause of spill (root intrusion, grease, line break, third party, vandalism).

	5. System failure and location (main, lateral, lift station, etc.). 6. Description of facility (pipe, MH, pump - size, material, slope, age) at failure location. 7. Description of impact of the spill. 8. Whether or not the spill was associated with a storm event. 9. Description of response actions including initial containment and cleanup efforts. 10. Description of corrective actions including steps to prevent reoccurrence and when those actions are planned. 11. Spill response completion date. 12. Description of investigation findings for spill cause. 13. Reasons if an investigation is ongoing and when it may be completed. 14. Name of and type of water body. 15. Description of impacts to the water body (effect on aquatic life, habitat, public closure, warnings, agency effecting a closure, duration of closure). 16. Whether or not the spill was within 1,000 feet of a municipal water intake. 17. Location samples were taken and for what constituents tests were conducted. Submit any amendment to the <u>certified</u> spill report within ninety (90) calendar days after the spill end date on CIWQS. After 90 days the Legally Responsible Official may request authorization from the SWRCB to submit an amendment. If ≥ 50,000 gallons is discharged to surface waters, a technical report must be submitted on CIWQS within forty five (45) calendar days after the spill end date. See Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ Attachment E1, Section 3.13 for content of a technical report.

Category 1 Spills < 1,000 Gallons

Notification	None required, however, it is policy to notify RWQCB and County EHS staff by phone and email. Provide the following information: • Name and phone number of caller and agency. • Provide date and time when informed. • Indicate event circumstances and cause. • Location (address, cross street, etc.). • Indicate if water body affected. • Estimation of the spill volume and rate.
Monitoring	Acquire specific data for reporting: • Note spill origin (MH or pipe number), location, spread, and extent (using pictures, GPS, street addresses or intersections, etc.). • Note receiving area or facility (ground surface, roadway, drain system, creek – note if dry or flowing). • Note cleanup areas (pictures, GPS). • Estimate spill volume using estimation techniques, calculations, measurements, equipment, or tools). Update as necessary. • Estimate volume recovery. Update as necessary. • Estimate travel time to the receiving water, velocity, flow rate. If entering a conveyance system (drain pipe system), estimate travel time to the receiving water, velocity, flow rate separately from exposed travel. • Document and photograph impact to creek banks, floating matter, surface sheen, discoloration, and observed impacts to the water body. If dry creek bed, indicate no sampling due to no flow. Collect samples if directed to do so by supervisorial, management, or executive staff.
Reporting	Timelines for reporting: Submit <u>draft</u> spill report on CIWQS within three (3) business days for any Category 1 spill. Include at minimum (additional information as required for the certified spill report may also be included): 1. Name and phone number of submitter. 2. Spill location name. 3. Date and time of awareness of spill. 4. Time of arrival at the site. 5. Estimated spill start date and time. 6. Description, pictures, and GPS data detailing spill location.

	7. Estimated spill volume. 8. Description and pictures detailing extents of spill area. 9. Description and pictures of the conveyance system, entry location, estimate of spill volume recovered, and estimate of spill volume remaining. 10. Description and pictures of discharge point to the water body. 11. Estimate of spill volume discharged to the water body. 12. Estimate of total spill volume recovered. Submit certified spill report on CIWQS within fifteen (15) calendar days of the spill end date. In addition to the information provided for the draft spill report include: 1. Description, pictures, and GPS data detailing full spread and reach of the spill location (or if no change from draft report). 2. Spill end date and time. 3. Documentation as to how the estimated spill volumes were generated (methodology, calculations, flow data from SCADA, historical trending flow data, measurements, flow rates, start and stop times, etc.). 4. Cause of spill (root intrusion, grease, line break, third party, vandalism). 5. System failure and location (main, lateral, lift station, etc.). 6. Description of facility (pipe, MH, pump - size, material, slope, age) at failure location. 7. Description of impact of the spill. 8. Whether or not the spill was associated with a storm event. 9. Description of response actions including initial containment and cleanup efforts. 10. Description of corrective actions including steps to prevent reoccurrence and when those actions are planned. 11. Spill response completion date. 12. Description of investigation findings for spill cause. 13. Reasons if an investigation is ongoing and when it may be completed. 14. Name of and type of water body. 15. Description of impacts to the water body (effect on aquatic life, habitat, public closure, warnings, agency effecting a closure, duration of closure). 16. Whether or not the spill was within 1,000 feet of a municipal water intake. 17. If samples were taken, location and for what constituents tests were conducted. Submit any amendment to the certified spill report within ninety (90) calendar days after the spill end date on CIWQS. After 90 days the Legally Responsible Official may request authorization from the SWRCB to submit an amendment.

Category 2 Spills

Notification	Call the California Office of Emergency Services (CalOES) at (800) 852-7550 and obtain a notification control number within two (2) hours of becoming aware of the spill. Provide the following information: • Name and phone number of caller and agency. • Provide date and time when informed. • Indicate event circumstances and cause. • Location (address, cross street, etc.). • Indicate a water body is not affected. • Estimation of the spill volume and rate. Make additional calls to CalOES to provide updates to changes in information, if needed.
Monitoring	Acquire specific data for reporting: • Note spill origin (MH or pipe number), location, spread, and extent (using pictures, GPS, street addresses or intersections, etc.). • Note receiving area or facility (ground surface, roadway, drain system – but captured). • Note cleanup areas (pictures, GPS). • Estimate spill volume using estimation techniques, calculations, measurements, equipment, or tools). Update as necessary. • Estimate volume recovery. Update as necessary. Note that all of the spill volume must be recovered to be a Category 2 Spill. Demonstrate how it is known that the entire spill has been recovered. Indicate that all wash water, especially if chlorinated, was also fully recovered. • Estimate travel time to the furthest location, velocity, flow rate. If entering a conveyance system (drain pipe system), estimate travel time to the entry point, velocity, flow rate separately from exposed travel. • Document and photograph impact to spill area, waste matter, surface sheen, discoloration, any observed impacts to the ground or conveyance system.
Reporting	Timelines for reporting: Submit <u>draft</u> spill report on CIWQS within three (3) business days for any Category 2 spill. Include at minimum (additional information as required for the certified spill report may also be included): 1. Name and phone number of submitter. 2. Spill location name. 3. Date and time of awareness of spill. 4. Time of arrival at the site.

	5. Estimated spill start date and time. 6. Date and time CalOES was notified and the assigned control number. 7. Description, pictures, and GPS data detailing spill location. 8. Estimated spill volume. 9. Description and pictures detailing extents of spill area. 10. Description and pictures of the conveyance system, entry location, estimate of spill volume recovered. Note no spill volume may remain unless it discharges to a terminal point such as a dedicated stormwater infiltration basin or facility where is can be captured. Estimate of spill volume captured from the basin of facility. 11. Estimate of total spill volume recovered. Submit certified spill report on CIWQS within fifteen (15) calendar days of the spill end date. In addition to the information provided for the draft spill report include: 1. Description, pictures, and GPS data detailing full spread and reach of the spill location (or if no change from draft report). 2. Spill end date and time. 3. Documentation as to how the estimated spill volumes were generated (methodology, calculations, flow data from SCADA, historical trending flow data, measurements, flow rates, start and stop times, etc.). 4. Cause of spill (root intrusion, grease, line break, third party, vandalism). 5. System failure and location (main, lateral, lift station, etc.). 6. Description of facility (pipe, MH, pump - size, material, slope, age) at failure location. 7. Description of impact of the spill. 8. Whether or not the spill was associated with a storm event. 9. Description of response actions including initial containment and cleanup efforts. 10. Description of corrective actions including steps to prevent reoccurrence and when those actions are planned. 11. Spill response completion date. 12. Description of investigation findings for spill cause. 13. Reasons if an investigation is ongoing and when it may be completed. 14. Whether or not the spill was within 1,000 feet of a municipal water intake. Submit any amendment to the certified spill report within ninety (90) calendar days after the spill end date on CIWQS. After 90 days the Legally Responsible Official may request authorization from the SWRCB to submit an amendment.

Category 3 Spills

Notification	None required. Collect the following information: • Name and phone number of caller and agency. • Provide date and time when informed. • Indicate event circumstances and cause. • Location (address, cross street, etc.). • Indicate if water body affected. • Estimation of the spill volume and rate.
Monitoring	Acquire specific data for reporting: • Note spill origin (MH or pipe number), location, spread, and extent (using pictures, GPS, street addresses or intersections, etc.). • Note receiving area or facility (ground surface, roadway, drain system, creek – note if dry or flowing). • Note cleanup areas (pictures, GPS). • Estimate spill volume using estimation techniques, calculations, measurements, equipment, or tools). Update as necessary. • Estimate volume recovery. Update as necessary. • Estimate travel time to the receiving water, velocity, flow rate. If entering a conveyance system (drain pipe system), estimate travel time to the receiving water, velocity, flow rate separately from exposed travel. • Document and photograph impact to creek banks, floating matter, surface sheen, discoloration, and observed impacts to the water body.
Reporting	Timelines for reporting: Submit <u>certified</u> spill report on CIWQS within thirty (30) calendar days after the end of the month in which the spill occurred. The monthly reporting of all Category 3 spills must include the following for each spill: 1. Name and phone number of submitter. 2. Spill location name. 3. Date and time of awareness of spill. 4. Time of arrival at the site. 5. Estimated spill start date and time. 6. Description, pictures, and GPS data detailing spill location. 7. Estimated spill volume. 8. Description and pictures detailing extents of spill area. 9. Description and pictures of the conveyance system, entry location, estimate of spill volume recovered, and estimate of spill volume discharged to and

	recovered from a basin or facility, if applicable. 10. Estimate of total spill volume recovered. 11. Description, pictures, and GPS data detailing full spread and reach of the spill location. 12. Spill end date and time. 13. Documentation as to how the estimated spill volumes were generated (methodology, calculations, flow data from SCADA, historical trending flow data, measurements, flow rates, start and stop times, etc.). 14. Cause of spill (root intrusion, grease, line break, third party, vandalism). 15. System failure and location (main, lateral, lift station, etc.). 16. Description of facility (pipe, MH, pump - size, material, slope, age) at failure location. 17. Description of impact of the spill. 18. Whether or not the spill was associated with a storm event. 19. Description of response actions including initial containment and cleanup efforts. 20. Description of corrective actions including steps to prevent reoccurrence and when those actions are planned. Indicate if a local regulatory agency has taken action on the spill, if system modifications, repairs, or maintenance program modifications, or if capital improvements were completed or are planned. 21. Spill response completion date. 22. Description of investigation findings for spill cause. 23. Reasons if an investigation is ongoing and when it may be completed. Submit any amendment to the certified spill report within ninety (90) calendar days after the spill end date on CIWQS. After 90 days the Legally Responsible Official may request authorization from the SWRCB to submit an amendment.

Category 4 Spills

Notification	None required. Collect the following information: • Name and phone number of caller and agency. • Provide date and time when informed. • Indicate event circumstances and cause. • Location (address, cross street, etc.). • Indicate if water body affected. • Estimation of the spill volume and rate.
Monitoring	Acquire specific data for reporting: • Note spill origin (MH or pipe number), location, spread, and extent (using pictures, GPS, street addresses or intersections, etc.). • Note receiving area or facility (ground surface, roadway, drain system, creek – note if dry or flowing). • Note cleanup areas (pictures, GPS). • Estimate spill volume using estimation techniques, calculations, measurements, equipment, or tools). Update as necessary. • Estimate volume recovery. Update as necessary. • Estimate travel time to the receiving water, velocity, flow rate. If entering a conveyance system (drain pipe system), estimate travel time to the receiving water, velocity, flow rate separately from exposed travel. • Document and photograph impact to creek banks, floating matter, surface sheen, discoloration, and observed impacts to the water body.
Reporting	Timelines for reporting: Submit <u>certified</u> reports on CIWQS for Category 4 spills occurring in a calendar year by the following February 1. Data and information to be submitted includes to following: 1. Name and phone number of submitter. 2. Spill location name. 3. Description, pictures, and GPS data detailing spill location. 4. Description and pictures of the conveyance system, entry location, estimate of spill volume recovered, and estimate of spill volume discharged to and recovered from a basin or facility, if applicable. 5. Estimated spill volume. 6. Estimated spill start date and time. 7. Cause of spill (root intrusion, grease, line break, third party, vandalism). 8. System failure and location (main, lateral, lift station, etc.).

	9. Description of response actions including initial containment and cleanup efforts. 10. Documentation as to how the estimated spill volumes were generated (methodology, calculations, flow data from SCADA, historical trending flow data, measurements, flow rates, start and stop times, etc.). 11. Description of system, operating or maintenance modifications. 12. Description of corrective actions including steps to prevent reoccurrence and when those actions are planned. Indicate if a local regulatory agency has taken action on the spill, if system modifications, repairs, or maintenance program modifications, or if capital improvements were completed or are planned. Private lateral spills not occurring due to a blockage in the public sewer main or trunk line, if made known to district staff, are not reported on CIWQS. These are to be reported to County EHS for action. Addresses and dates of these events are to be documented by district staff.

A report certifying no spills or the number of Category 4 spills to reported on annually must be submitted on CIWQS monthly. Submit the certified report within thirty (30) calendar days from the end of the prior calendar month.

IV. Post-spill Assessments of Spill Response Activities

Post-spill assessments of spill response activities to follow each reportable spill will be conducted by responding staff as well as collection system staff shortly after cleanup efforts are completed. The purpose will be to evaluate a spill event response for adherence to the Spill Emergency Response Plan (SERP), effectiveness of spill recovery and cleanup, compliance with the General Order, to consider safety aspects of the response, and to consider improvement.

V. Annual Review and Spill Emergency Response Plan Updates

Annual review and assessment of the Spill Emergency Response Plan will be performed to evaluate the effectiveness in achieving its desired goals. This review will be completed with the annual SSMP audit (note it is district policy to perform SSMP audits annually although the General Order requires them every three years per Section 5.4). The review will use the post-spill assessments of spill response activities, above, to make changes to the SERP. Note that the SERP as an appendix to the SSMP may be updated at any time, including to amend employee roster information.

Changes to the SERP will be maintained in a SSMP change log in order to document SSMP changes for SSMP updates. Recall that SSMP updates require board approval, which may be completed at any time but must be completed at least once every six (6) years by from August 2, 2025. SERP updates may also occur at the same time as SSMP updates.

ATTACHMENTS

Attachment A - Laguna County Sanitation District Call Out List and Agency Contacts

ATTACHMENT A

LAGUNA COUNTY SANITATION DISTRICT
AFTER HOURS CALL OUT LIST FOR
SEWER PROBLEMS
IN THE ORCUTT AREA

Laguna County Sanitation District Office	(805) 803-8750
Laguna County Sanitation District Plant	(805) 934-6282

Plant hours are daily from 6:30 a.m. to 5:00 p.m.

For non-working hours:

On-Call Sewer Cell Phone	**(805) 310-2252**
On-Call Plant Cell Phone	**(805) 310-2237**

Allow ten minutes for a response from the on-call phone. If no response, proceed down this list.

Sewer Collection System Contacts

Billy Mann	(805) 720-0767
Javier Yepez	(310) 817-1421
Cleve Jones	(805) 837-5746
Eddie Lucio	(805) 621-4900
Vacant	

Plant Operation Contacts

Robbie Anderson	(209) 640-2786
Sean Brown	(805) 266-2487
Ricardo Contreras	(805) 249-0043
Jasen Farris	(805) 268-2485
Curtis Gregory	(805) 260-8036
Daniel Ramirez	(805) 944-8670
Derrick Truer	(805) 260-1951

Management Contacts

Jerry Nichols, Chief	(805) 310-1163 / (650) 980-7397
Jesse Padfield, Supervisor	(805) 720-2596
Kevin Thompson, District Engineer	(805) 310-1160 / (619) 415-3744
Martin Wilder, General Manager	(805) 310-1171 / (805) 709-7488

Other Agency Contacts

County Public Works Transportation Maintenance	
County Flood Control District Maintenance	
Regional Water Quality Control Board	(805) 549-3147
County Environmental Health Services	(805) 346-8485, after hours (805) 681-4900
California Dept. of Fish and Wildlife	(916) 445-9338
Office of Spill Prevention and Response	

LAST UPDATED 05/30/2025

Attachment B – CUPA Release Reporting Guidelines

SANTA BARBARA COUNTY ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION / CUPA

RELEASE REPORTING GUIDELINES

For Emergency Response: Call 9-1-1

To notify the CUPA of a Hazardous Materials Spill / Release: (805) 681-4927
To notify CalOES of a Hazardous Materials Spill / Release: (916) 845-8911
(800) 852-7550
To notify the NRC of a Hazardous Materials Spill / Release: (800) 424-8802

SANTA BARBARA COUNTY CUPA CONTACT INFO:

Santa Maria Office
2125 S. Centerpointe Pkwy, Rm. 333
Santa Maria, CA 93455
Phone: (805) 346-8460
Fax: (805) 346-8485

Santa Barbara Office
225 Camino Del Remedio
Santa Barbara, CA 93110
Phone: (805) 681-4900
Fax: (805) 681-4901

Release Reporting Requirements

The Department of Environmental Health Services, Hazardous Materials Division, also known as the Certified Unified Program Agency (CUPA) for the County of Santa Barbara, has become aware that there is a substantial need to provide businesses, subject to hazardous materials releases, with a better understanding of the hazardous materials release reporting notification requirements. The following information is intended to help promote consistent release reporting to the CUPA and the California Governor's Office of Emergency Services (CalOES). Words and phrases in **bold and underlined** are defined further in the definitions section of this document. There are no penalties for reporting a release – be it significant or not. It is the responsibility of the business to prove why the release is not considered to be significant. When in doubt, REPORT!

Who should report a hazardous materials release?

As per California Health & Safety Code (HSC) § 25510:
*"…a **hazardous material**, hazardous waste, or hazardous substance **release** or **threatened release** shall be reported by the handler, or an employee, authorized representative, agent, or designee of the handler, to the UPA and to the Office of Emergency Services in accordance with the regulations adopted pursuant to this section, as follows:*
A) For facilities subject to this chapter, the reporting shall be made immediately upon the discovery of a release or threatened release.
*(B) (i) For facilities not subject to this chapter, the reporting shall be made upon the discovery of an actual release that results in an **emergency response**."*

Note: HSC § 25510 does not apply to a person engaged in the transportation of a hazardous material on a highway that is subject to Sections 2453 and 23112.5 of the Vehicle Code. However, in the event of an emergency situation, call 9-1-1. Other reporting requirements may apply pursuant to vehicle code regulations.

"Immediate Reporting of a Release or Threatened Release"

As per Title 19, California Code of Regulations (19 CCR), § 2631(a):

"A person shall provide an immediate, verbal report of any release or threatened release of a hazardous material to the administering agency [the CUPA] and the California Governor's Office of Emergency Services [i.e. CalOES] as soon as:

1. *A person has knowledge of the release or threatened release;*
2. *Notification can be provided without impeding immediate control of the release or threatened release;*
3. *Notification can be provided without impeding immediate emergency medical measures.*

The immediate reporting requirements are not based on the quantity of the material. They are based on the hazardous material's potential to cause harm to human health and safety, property, or the environment – *regardless of quantity.*

As per Title 19, California Code of Regulations (19 CCR), § 2631(c):
"The immediate reporting pursuant to subsection (a) of this section shall not be required if there is a reasonable belief that the release or threatened release poses no significant present or potential hazard to human health and safety, property, or the environment."

Why are '*threatened releases*' reportable?

To give the response agencies time to prepare in case the immediate, emergency corrective action is insufficient or is taken too late. Additionally, it would enable the CUPA to monitor such releases and to promptly respond as necessary to protect public health and safety and the environment.

What information should be reported?

- Date of release
- Time of release
- Location of release
- Type of material released
- How much / quantity of material released?
- Were there any injuries / chemical exposure?
- Were there any storm drains near the release?
- Was the material cleaned up? By whom?
- How?
- If known, the potential hazards presented by the hazardous material involved in the release or threatened release

Important Definitions

"Hazardous Material" means any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. 'Hazardous materials' include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment. [HSC 25501(n)]

"Emergency Response" means the activation of any public emergency response personnel, as defined in Section 25501, who are responsible for response, mitigation, or recovery activities in a hazardous material incident where public health, public safety, or the environment may be affected.

"Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, unless permitted or authorized by a regulatory agency. [HSC 25501(o)]

"Threatened release" means a condition, circumstance, or incident making it necessary to take immediate action to prevent, reduce, or mitigate a release with the potential to cause damage or harm to persons, property, or the environment (HSC 25501(s)). A threatened release could be viewed as any situation in which a release of hazardous materials is likely to occur unless immediate, unplanned, or unscheduled corrective action is taken.

Examples of a "Significant" and "Non-Significant" Release

May be "Non-Significant":

- During planned maintenance at a fixed facility, small drips are to be expected and may be considered "non-significant," and thus may not be reportable.
- If a small release of a relatively innocuous material is spilled within facility boundaries, and is contained and cleaned up in a short amount of time, it may be "non-significant." (e.g. one gallon of petroleum oil is spilled onto a concrete floor of a warehouse and is immediately contained and cleaned up –OR- a few ounces of gasoline spill during a customer drive-off at a fuel station and absorbent is immediately applied, then cleaned up and properly handled.)
- If a small amount of a relatively innocuous material is released into secondary containment and it is cleaned up in a short amount of time, it may be "non-significant." (e.g. one gallon of fuel from an underground storage tank (UST) is released into the secondary containment sump, it does not deteriorate the walls of the secondary containment and it is properly removed within eight (8) hours.) ***Note: UST regulations (23 CCR 2650) require this type of release to be RECORDED.***

May be "Significant":

- Any release of a hazardous material that result in a fatality, chemical exposure, or other injury, to an employee or member of the public.
- If any part of the release, including airborne releases, extends outside of the facility boundaries.
- Any release or threatened release of a hazardous material that results in an evacuation
- Any release that cannot be immediately mitigated by qualified facility personnel (e.g., spill requires contacting a hazardous waste clean-up contractor for proper remediation).
- Any release that requires the use of respiratory protection for mitigation and/or abatement.
- Any release or threatened release where emergency response personnel are called.
- Any release of a Regulated Substance under the California Accidental Release Prevention (CalARP) (CCR Title 19), Extremely Hazardous Waste (CCR Title 22), Extremely Hazardous Substance (EPCRA Section 302), or Acutely Hazardous Material (40 CFR).

FEDERAL REPORTING

If the release poses a significant threat to persons outside the facility, you must also report the incident to the National Response Center (NRC) under the Emergency Response Planning and Community Right to Know Act (EPCRA). Also, according to Title 40 of the Code of Federal Regulations (40 CFR), Part 355.33, a report to NRC is required if there is a release at a facility of a CERCLA Hazardous Substance exceeding the Reportable Quantity (RQ) listed in 40 CFR § 302.4. RQs are listed in pounds, and any release amount must be converted into pounds to determine if the RQ was exceeded.

In addition to state and local reporting, there are also federal reporting requirements. Even if you have already reported a spill to State OES and the CUPA, you still have a legal obligation to notify the NRC if the release is federally reportable. **The phone number to the NRC is (800) 424-8802.**

Attachment C - Laguna County Sanitation District Field Spill Report

OFFICE
620 West Foster Road
Santa Maria, CA 93455
(805) 803-8750

PLANT
3500 Black Road
Santa Maria, CA 93455
(805) 934-6282

LAGUNA COUNTY SANITATION DISTRICT
County of Santa Barbara
Public Works Department

FIELD SPILL REPORT

DATE RECEIVED: _____ TIME: _____ AM/PM RECEIVED BY: _____

CALLER'S NAME: _____ CALLER'S PHONE NO: _____

CALLER'S ADDRESS: _____

LOCATION OF OVERFLOW: _____

TIME & NAMES OF CREW MEMBERS DISPATCHED: _____

DESCRIPTION OF COMPLAINT: _____

TIME ARRIVED AT SITE: _____ CREW: _____

WEATHER: _____

TIME OVERFLOW STARTED: _____ TIME OVERFLOW STOPPED: _____

OVERFLOW DURATION: _____MINUTES OVERFLOW RATE: _____GAL/MIN

U/S MH # _____ D/S MH # _____ PIPE #_____

SIZE AND TYPE OF LINE: _____ LENGTH OF LINE: _____

OVERFLOW APPEARANCE POINT CLOSEST ADDRESS: _____

LATITUDE: _____ LONGITUDE: _____

LOCATION OF PLUG (PUBLIC OR PRIVATE): _____

LOCATION OF OVERFLOW (PUBLIC OR PRIVATE): _____

DESCRIBE CAUSE OF OVERFLOW: _____

ACTION TAKEN TO STOP OVERFLOW: _____

DESCRIBE CLEANUP METHOD: _____

ESTIMATED OVERFLOW VOLUME: _____ OVERFLOW CATEGORY: 1 2 3 4 Private

DESCRIBE HOW OVERFLOW VOLUME WAS DETERMINED: _____

RECEIVING WATERS: YES ☐ NO ☐ LOCATION: _____

FINAL OVERFLOW DESTINATION: _____

TYPE OF PROBLEM: (ROOTS, GREASE, FOREIGN OBJECT, SYSTEM FAILURE, ETC.): _____

PICTURES TAKEN: YES ☐ NO ☐

SAMPLES TAKEN BY: _____

LOCATION OF SAMPLES: _____

DESCRIBE PROPERTY DAMAGE AND AFFECTED AREA(S): _____

_____

SIGNS POSTED: YES ☐ NO ☐ BARRICADED: YES ☐ NO ☐ NOTIFY NEIGHBORS: YES ☐ NO ☐

REGULATORY AGENCIES NOTIFIED:

RWQCB	YES ☐ NO ☐	DATE/TIME _____	OVERFLOW #: FY ___/___-_____
Cal-EMA (OES)	YES ☐ NO ☐	DATE/TIME _____	CONTROL #:_____
COUNTY EHS	YES ☐ NO ☐	DATE/TIME _____	
OTHER _____	YES ☐ NO ☐	DATE/TIME _____	

CONTACTS/DETAILS: _____

FOLLOW UP MEASURES: _____

_____

_____

DATE OF LAST MAINTENANCE: _____

TYPE OF MAINTENANCE LAST PERFORMED: _____

_____

_____

REPORT COMPLETED BY: _____ DATE: _____

PICTURES OF AREA: (Include before overflow and after cleanup; pictures of manholes, intersections, location of stoppage, etc).

Attachment D - Visual Comparison of Overflow Rates

City of San Diego
Metropolitan Wastewater Department

Reference Sheet for Estimating Sewer Spills from Overflowing Sewer Manholes

All estimates are calculated in gallons per minute (gpm)

Wastewater Collection Division
(619) 654-4160

5 gpm

25 gpm

50 gpm

100 gpm

150 gpm

200 gpm

225 gpm

250 gpm

275 gpm

All photos were taken during a demonstration using metered water from a hydrant in cooperation with the City of San Diego's Water Department.

rev. 4/99