

CITY OF PLACENTIA
SEWER SYSTEM MANAGEMENT PLAN
CALIFORNIA STATE WATER RESOURCES CONTROL BOARD
ORDER NO. 2006-0003-DWQ



January 2020

FINAL

Volume I

PREPARED FOR
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Placentia, California 92870

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JANUARY 2020

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Prepared for:

CITY OF PLACENTIA
401 East Chapman Avenue
Placentia, California 92870

Pursuant to the provisions of the
CALIFORNIA STATE WATER RESOURCES CONTROL BOARD
ORDER NO. 2006.0003-DWQ
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS (WDR)
FOR SANITARY SEWER SYSTEMS

January 2020

DUDEK

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Rev 11/2019

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BMP	Best Management Practice
CCTV	Closed-Circuit Television
CIP	Capital Improvement Program
City	City of Placentia
CIWQS	California Integrated Water Quality System
CPC	California Plumbing Code
CWEA	California Water Environment Association
ERP	Emergency Response Plan
FOG	Fats, Oils, and Grease
FSE	Food Service Establishment
GIS	Geographic Information System
GPS	Global Positioning System
GWDR	General Waste Discharge Requirements also referred to as the Waste Discharge Requirements (WDR)
I&I	Inflow & Infiltration
LRO	Legally Responsible Official
MRP	Monitoring and Reporting Program
MS4	Municipal Separate Storm Sewer System
NASSCO	National Association of Sewer Service Companies
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
OC	Orange County
OCHCA	Orange County Health Care Agency
OCSD	Orange County Sanitation District
OES	Office of Emergency Services (aka Cal OES)
Order	SWRCB Order No. 2006-0003-DWQ adopted May 2, 2006
PLSD	Private Lateral Sewage Discharge
PM	Preventative Maintenance
PMP	Preventative Maintenance Program
R&R	Rehabilitation and Replacement
Region 8	RWQCB, Santa Ana Region
RWQCB	Regional Water Quality Control Board
SECAP	System Evaluation and Capacity Assurance Plan
SOP	Standard Operating Procedure <u>or</u> Standard Maintenance Procedure
SSO	Sanitary Sewer Overflow and any sewer spill or overflow of sewage
SSOERP	Sanitary Sewer Overflow Emergency Response Plan
SSMP	Sewer System Management Plan
SWRCB	State Water Resources Control Board
VCP	Vitrified Clay Pipe
WDR	Waste Discharge Requirements, also referred to as the General Waste Discharge Requirements (GWDR)
WWTP	Wastewater Treatment Plant

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INTRODUCTION

On May 2, 2006 the State Water Resources Control Board (SWRCB or State Water Board) adopted Order Number 2006-0003-DWQ Stateside General Waste Discharge Requirements for Sanitary Sewer Systems (Order or WDR) that requires all publicly owned sewage collection systems having more than one mile of pipeline develop, implement and fund a Sewer System Management Plan (SSMP) which establishes the minimum requirements under which a public collection system must be operated and maintained. The purpose of the Order is to prevent sanitary sewer overflows (SSOs), and to provide a plan and schedule for measures to be implemented for SSO prevention including measures to effectively clean up and report SSOs. A copy of the WDR is included in Appendix A.

As the City had been under a similar Order from the Santa Ana Regional Water Quality Control Board (Region 8) since 2002 the City had developed a successful SSMP to comply with the Region 8 Order. Because of the similarities of the two Orders, the SSMP developed for compliance to the Region 8 Order was rewritten to establish compliance with the new SWRCB Order. This is the most cost effective approach as most of the documentation and programs developed to comply with the Region 8 Order only required minor to moderate modifications to comply with the SWRCB Order.

The development and implementation of the SSMP has been very beneficial to the City of Placentia. The City now has an effective management, operations and maintenance (O&M) program for its sanitary sewer collection system that has resulted in a dramatic reduction in sewer overflows within the City. City food service establishments (FSE) are under a comprehensive fats, oils and grease (FOG) reduction program that has reduced the amount of FOG (the number one cause of sewer overflows, historically) into the City's sewer system. The City's sewer pipelines are annually cleaned and have been closed-circuit television (CCTV) inspected with deficient segments being added to the City's capital improvement program projects list. Funding is provided by the City's sewer service fee.

The City's written sewer management, operations and maintenance program is contained in two volumes. Volume I is the actual SSMP (this document) which summarizes the programs and activities the City utilizes to comply with the WDR. Volume II includes the appendices referenced in this SSMP. The SSMP is divided into chapters with each chapter dedicated to a specific element of the WDR. Each chapter contains the requirement taken from the WDR and the plan the City utilizes to comply with that requirement. Volume II contains the detailed written programs and practices the City utilizes for the management, operation and maintenance of its sanitary sewer system.

This SSMP reflects the ongoing day-to-day activities of the City of Placentia for the management, operation, maintenance, and funding of the City's sanitary sewer system. As such, this SSMP becomes a living document subject to constant review and revision as conditions and needs of the sanitary sewer collection system change. This SSMP relies on numerous supporting documents, also subject to change, that form the basis for how the City conducts its sanitary sewer collection system management, operation, and maintenance. Although subject to update at any time, the most current version of the SSMP is available at the Placentia City

Hall and on the City's website. A change log to document any changes to any elements of this SSMP is included in Appendix B of Volume II of this SSMP.

In September 2013, the SWRCB made substantial changes to the Monitoring and Reporting requirements for sanitary sewer overflows. These new requirements are discussed in Chapter 3, Sections 3.2.1 and 3.2.2, which detail how the City is organized to respond and report sanitary sewer overflows. A copy of the amendment, Order Number WQ 2013-0058-EXEC, to the Monitoring and Reporting Program (2013 MRP) is located in Volume II, Appendix A.

The SWRCB is in the process of reissuing the Order, anticipated to be adopted in late 2020 or early 2021. Until the new WDR is formally adopted, compliance will remain consistent with the 2006 WDR and the 2013 MRP. This SSMP Update complies with the most current requirements.

ABOUT THIS DOCUMENT

The City has prepared this SSMP to ensure compliance with the Order. For ease of use, the City has divided its SSMP into two volumes. Volume I consists of the actual SSMP (this document) with Volume II containing, where practical, the supporting documentation summarized in the SSMP. The SSMP (Volume I) is divided into chapters with each chapter dedicated to a specific element of the WDR. Each chapter contains the requirement taken from the WDR and the plan the City utilizes to comply with that requirement. The *Compliance Summary* of each chapter summarizes the program or activities the City utilizes for compliance. The *Compliance Documents* section lists the supporting documents, and their location, that the City has developed as part of its SSMP. A master list of all City positions involved in developing and implementing the SSMP, including job titles and job descriptions, is located in Chapter 3 - Description of Organization. Actual names and contact information for the listed job titles is available at the Placentia City Hall. This is done to facilitate staff changes and protect staff privacy.

DEFINITIONS

1. **Sanitary sewer overflow (SSO)** - Any overflow, spill, release, discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system. SSOs include:
 - a. Overflows or releases of untreated or partially treated wastewater that reach waters of the United States;
 - b. Overflows or releases of untreated or partially treated wastewater that do not reach waters of the United States; and
 - c. Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.

2. **Sanitary sewer system** – Any system of pipes, pump stations, sewer lines, or other conveyances, upstream of a wastewater treatment plant headworks used to collect and convey wastewater to the publicly owned treatment facility. Temporary storage and conveyance facilities (such as vaults, temporary piping, construction trenches, wet wells, impoundments, tanks, etc.) are considered to be part of the sanitary sewer system, and discharges into these temporary storage facilities are not considered to be SSOs.

For purposes of this Order, sanitary sewer systems include only those systems owned by public agencies that are comprised of more than one mile of pipes or sewer lines.

3. **Enrollee** - A federal or state agency, municipality, county, district, and other public entity that owns or operates a sanitary sewer system, as defined in the general WDRs, and that has submitted a complete and approved application for coverage under this Order.

4. **SSO Reporting System** – Online spill reporting system that is hosted, controlled, and maintained by the State Water Board. The web address for this site is <http://ciwqs.waterboards.ca.gov>. This online database is maintained on a secure site and is controlled by unique usernames and passwords.

5. **Untreated or partially treated wastewater** – Any volume of waste discharged from the sanitary sewer system upstream of a wastewater treatment plant headworks.

6. **Satellite collection system** – The portion, if any, of a sanitary sewer system owned or operated by a different public agency than the agency that owns and

operates the wastewater treatment facility to which the sanitary sewer system is tributary.

7. **Nuisance** - California Water Code Section 13050, subdivision (m), defines nuisance as anything which meets all of the following requirements:
 - a. Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
 - b. Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
 - c. Occurs during, or as a result of, the treatment or disposal of wastes.
8. **WDR** – State Water Resources Control Board (SWRCB) Order No. 2006.0003-DWQ, known as the WASTE DISCHARGE REQUIREMENTS (WDR), which was adopted May 2, 2006.
9. **MRP** – SWRCB Order No. WQ 2013-0058-EXEC, known as the MONITORING AND REPORTING PROGRAM (MRP), which was adopted September 9, 2013.

PROHIBITIONS AND PROVISIONS

This chapter describes the sewage discharge prohibitions and thirteen provisions prescribed in the Order.

I.1 Prohibitions

To meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, the discharger is required to comply with the following prohibitions:

- Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.
- Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is prohibited.

I.2 Provisions

The discharger must meet the following thirteen provisions:

1. The Enrollee must comply with all conditions of this Order. Any noncompliance with this Order constitutes a violation of the California Water Code and is grounds for enforcement action.
2. It is the intent of the State Water Board that sanitary sewer systems be regulated in a manner consistent with the general WDRs. Nothing in the general WDRs shall be:
 - a. Interpreted or applied in a manner inconsistent with the Federal Clean Water Act, or supersede a more specific or more stringent state or federal requirement in an existing permit, regulation, or administrative/judicial order or Consent Decree;
 - b. Interpreted or applied to authorize an SSO that is illegal under either the Clean Water Act, an applicable Basin Plan prohibition or water quality standard, or the California Water Code;
 - c. Interpreted or applied to prohibit a Regional Water Board from issuing an individual NPDES permit or WDR, superseding this general WDR, for a sanitary sewer system, authorized under the Clean Water Act or California Water Code; or
 - d. Interpreted or applied to supersede any more specific or more stringent WDRs or enforcement order issued by a Regional Water Board.

3. The Enrollee shall take all feasible steps to eliminate SSOs. In the event that an SSO does occur, the Enrollee shall take all feasible steps to contain and mitigate the impacts of an SSO.
4. In the event of an SSO, the Enrollee shall take all feasible steps to prevent untreated or partially treated wastewater from discharging from storm drains into flood control channels or waters of the United States by blocking the storm drainage system and by removing the wastewater from the storm drains.
5. All SSOs must be reported in accordance with the 2013 MRP.
6. In any enforcement action, the State and/or Regional Water Boards will consider the appropriate factors under the duly adopted State Water Board Enforcement Policy. Consistent with the Enforcement Policy, the State and/or Regional Water Boards must consider the Enrollee's efforts to contain, control, and mitigate SSOs when considering the California Water Code Section 13327 factors. In assessing these factors, the State and/or Regional Water Boards will also consider whether:
 - a. The Enrollee has complied with the requirements of this Order, including requirements for reporting and developing and implementing a SSMP;
 - b. The Enrollee can identify the cause or likely cause of the discharge event;
 - c. There were no feasible alternatives to the discharge, such as temporary storage or retention of untreated wastewater, reduction of inflow and infiltration, use of adequate backup equipment, collecting and hauling of untreated wastewater to a treatment facility, or an increase in the capacity of the system as necessary to contain the design storm event identified in the SSMP. It is inappropriate to consider the lack of feasible alternatives, if the Enrollee does not implement a periodic or continuing process to identify and correct problems.
 - d. The discharge was exceptional, unintentional, temporary, and caused by factors beyond the reasonable control of the Enrollee;
 - e. The discharge could have been prevented by the exercise of reasonable control described in a certified SSMP for:
 - Proper management, operation and maintenance;
 - Adequate treatment facilities, sanitary sewer system facilities, and/or components with an appropriate design capacity, to reasonably prevent SSOs (e.g., adequately enlarging treatment or collection facilities to accommodate growth, inflow and infiltration (I/I), etc.);
 - Preventive maintenance (including cleaning and fats, oils, and grease (FOG) control);
 - Installation of adequate backup equipment; and

- Inflow and infiltration prevention and control to the extent practicable.
- f. The sanitary sewer system design capacity is appropriate to reasonably prevent SSOs.
 - g. The Enrollee took all reasonable steps to stop and mitigate the impact of the discharge as soon as possible.
7. When a sanitary sewer overflow occurs, the Enrollee shall take all feasible steps and necessary remedial actions to: a) control or limit the volume of untreated or partially treated wastewater discharged, b) terminate the discharge, and c) recover as much of the wastewater discharged as possible for proper disposal, including any wash down water.

The Enrollee shall implement all remedial actions to the extent they may be applicable to the discharge and not inconsistent with an emergency response plan, including the following:

- Interception and rerouting of untreated or partially treated wastewater flows around the wastewater line failure;
 - Vacuum truck recovery of sanitary sewer overflows and wash down water;
 - Cleanup of debris at the overflow site;
 - System modifications to prevent another SSO at the same location;
 - Adequate sampling to determine the nature and impact of the release; and
 - Adequate public notification to protect the public from exposure to the SSO.
8. The Enrollee shall properly manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.
9. The Enrollee shall allocate adequate resources for the operation, maintenance, and repair of its sanitary sewer system by establishing a proper rate structure, accounting mechanisms, and auditing procedures to ensure an adequate measure of revenues and expenditures. These procedures must be in compliance with applicable laws and regulations and comply with generally accepted accounting practices.
10. The Enrollee shall provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events. Capacity shall meet or exceed the design criteria as defined in the Enrollee's System Evaluation and Capacity Assurance Plan (SECAP) for all parts of the sanitary sewer system owned or operated by the Enrollee.

11. The Enrollee shall develop and implement a written Sewer System Management Plan (SSMP) and make it available to the State and/or Regional Water Board upon request. A copy of this document must be publicly available at the Enrollee's office and/or available on the Internet. This SSMP must be approved by the Enrollee's governing board at a public meeting.
12. In accordance with the California Business and Professions Code Sections 6735, 7835, and 7835.1, all engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. Specific elements of the SSMP that require professional evaluation and judgments shall be prepared by or under the direction of appropriately qualified professionals and shall bear the professional(s)' signature and stamp.
13. The mandatory elements of the SSMP are specified herein. However, if the Enrollee believes that any element of this section is not appropriate or applicable to the Enrollee's sanitary sewer system, the SSMP program does not need to address that element. The Enrollee must justify why that element is not applicable. The SSMP must be approved by the deadlines listed in the SSMP Time Schedule.

GOALS

This chapter describes the goals of the Sewer System Management Plan (SSMP). The goal of the SSMP is to provide a documented plan that describes all sanitary sewer collection system activities and programs employed by an agency to ensure proper management of all collection system assets. Implementing an SSMP will ensure proper management, operation, and maintenance of all parts of the sanitary sewer system, ultimately helping to reduce and prevent SSOs, as well as mitigate any SSOs that do occur including meeting all applicable regulatory notification and reporting requirements. Commitment to continual improvement will also ensure that the SSMP is both a living and sustainable document that is continually updated, revised, and tailored to meet the City’s needs. The City is required to comply with the “State Water Resources Control Board (SWRCB), Order No. 2006-0030 DWQ” (Order) on General Waste Discharge Requirements, the 2013 Revised Monitoring and Reporting Program (MRP) and any future amendments for publicly owned sewage collection agencies having more than one mile of collection pipelines.

2.1 Purpose

This element describes the City’s stated goals for its SSMP and is intended to clarify the City’s desired level of service that is being provided to its customers. The purpose of the Order is to prevent sanitary sewer overflows (SSOs). The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. That will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur. The City is required to prepare and maintain the SSMP to support this purpose.

2.2 Goals

The goals of the City’s SSMP include:

- a. Provide needs-based maintenance, including line cleaning, inspection and evaluation, repair, replacement and rehabilitation for the City’s entire sanitary sewer system designed to prevent, reduce or eliminate preventable SSOs. At a minimum, the City shall clean all of its sanitary sewer collection system lines every two years and annually review the City’s operation and maintenance practices and procedures.
- b. Retain qualified pipeline cleaning contractor(s) to provide efficient, cost effective sewer line cleaning based upon system need. Review the progress and efficiency of the line cleaning during the cleaning operation and upon its completion to ensure that cleaning is conducted consistent with the City’s cleaning standards.
- c. Maintain an inspection program to determine need, assess maintenance effectiveness and system deficiencies. Conduct CCTV re-inspections of the sewer collection system, including manholes, a minimum of every 5-7 years (14-20% per year). CCTV re-inspection videos are to replace current system inspection videos. Conduct spot CCTV inspections during line cleaning operations to ensure line cleaning quality.

- d. Respond to and mitigate all SSOs discharging from the City's sanitary sewer collection system and provide accurate reporting of all SSOs as described by the Order.
- e. Properly fund, manage, operate, and maintain the City's sanitary sewer collection system with adequately trained staff and/or contractors. Maintain adequate reserves for future sanitary sewer collection system rehabilitation or replacement. Annually review the City's Sewer Service Fee to ensure that the fee is adequate to fund the City's sanitary sewer collection system.

As required by the Order, a copy of the SSMP is maintained at the City's Department of Public Works, as well as on the City's website, and is available to the public, state and Regional Water Quality Control Board (RWQCB) upon request (as discussed in, Section D, Provisions, Item 11 of the Order) and is available to sanitary sewer system operations and maintenance personnel at all times.

A copy of the Order and any amendments are included in Volume II of this SSMP. The City will also comply with the Amended Monitoring and Reporting Program (MRP), Order No. 2013-0058-EXEC and all future revisions, included by reference in the Order. A copy of the WDR and the 2013 Monitoring and Reporting Program is included in Volume II of this SSMP.

ORGANIZATION

This chapter describes the City’s organization and chain of communication. The Order requires the following:

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

3.1 Name of Responsible or Authorized Representative

Luis Estevez, Director of Public Works, is the City’s authorized representative and is responsible for the certification of SSO reports and the SSMP elements. His contact information is (714) 993-8120 (office) and lestevez@placentia.org.

3.1.1 Administrative and Maintenance Positions

The Order requires the names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. Employee contact information is kept in a separate file to facilitate updating as employee positions change. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation. This information is offered in this document and in Volume II, Appendices C and D, of this SSMP.

3.1.2 Compliance Summary

The City’s Public Works Department is administered by the Public Works Director with engineering assistance from the City’s engineering contractor and administrative assistance from the Senior Management Analyst. Due to the small size of the City’s Public Works staff, maintenance and operation of the sanitary sewer collection system is performed via outside contract. The Public Works Supervisor and the Senior Management Analyst, amongst their other duties, assist the Maintenance Superintendent in the oversight of the contracted operations. The Public Works Supervisor and maintenance workers are the first responders to SSOs. The Public Works Supervisor is also responsible for notifying the appropriate contractor for an emergency response, protection of the City’s MS4, traffic control, cleanup assistance and

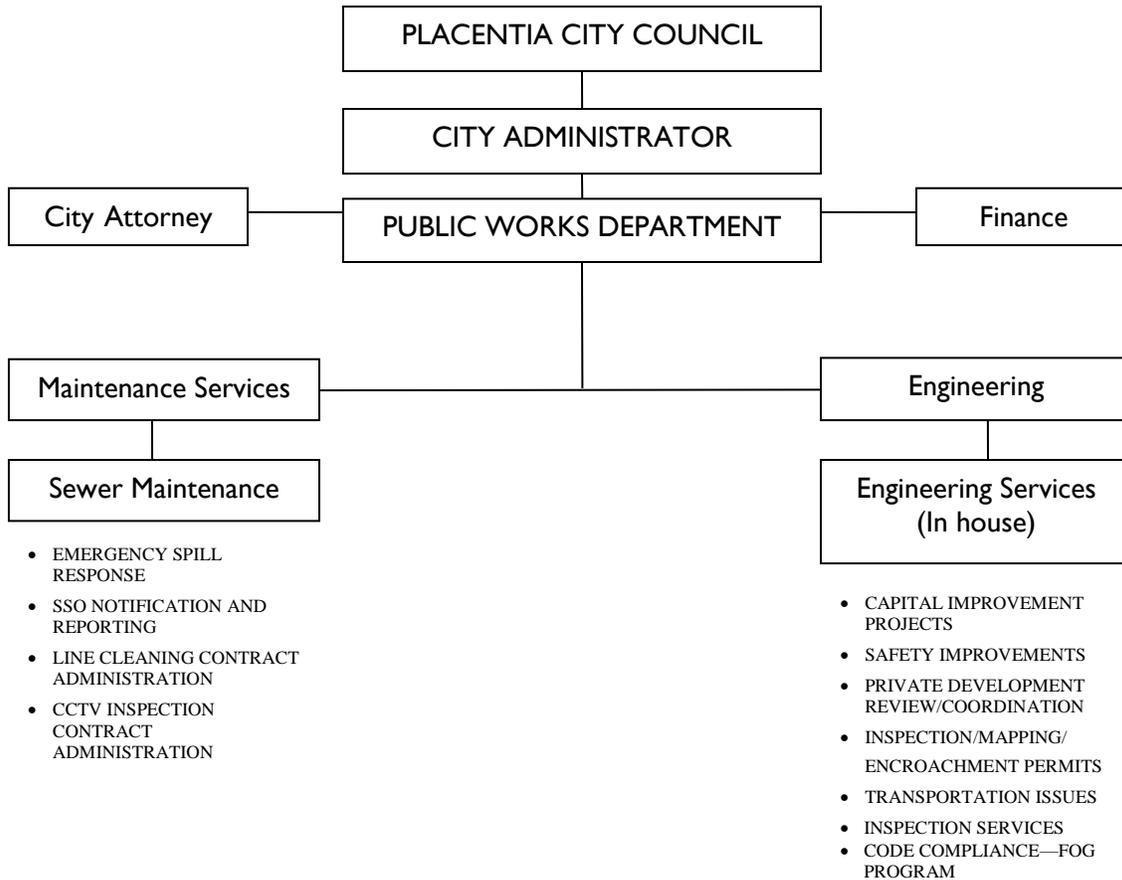
initial notification. The Maintenance Superintendent or Public Works Supervisor submits spill reports to CIWQS website with the City's Public Works Director, as the Legally Responsible Official (LRO), certifying all spill and no-spill reports. The Maintenance Superintendent is also responsible for the implementation of the various aspects of the WDR and review of efficiency of each of the WDR's components. The Public Works Supervisor oversees the operation of the Maintenance Workers, including their training, and reports to the Public Works Supervisor and the Maintenance Superintendent. A City Environmental Compliance Officer investigates SSOs that are a result of a violation of the City's ordinances for possible legal action. The City's FOG Discharge Reduction Program, overseen by the City's FOG Program Manager, regulates the discharge of FOG into the City's sanitary sewer collection system.

3.1.3 Compliance Documents

The following organizational chart shows the basic structure and relationship of all current City positions involved with the development or implementation of the SSMP. The organizational chart is also found in Appendix C of Volume II of this SSMP. The identified positions in the organizational chart(s) provide sufficient staffing to operate and maintain the City's sewer system on a sustainable basis, and to comply with all requirements of the Order. Updated organizational charts, staff titles, and staff contact information is maintained at the Placentia City Hall.

SSMP IMPLEMENTATION

Organizational Chart



3.1.4 Roles and Responsibilities

The roles and responsibilities of each position in the organization chart are listed here. These are City employees who have some responsibility in the development or implementation of the SSMP.

City Council	Establishes policies, reviews and accepts formal plans, sets overall City direction, authorizes funds for projects/plans/programs, general overview of upper management, conducts public meetings and hearings, approves SSMP
City Administrator	Responsible for the day-to-day management and operation of the City under the direction of the City Council.
City Attorney	The City’s attorney develops and approves legal documents, provides legal advice, conducts litigation, and attends public meetings.
City Engineer	(Some services provided by outside contract) Responsible for the engineering drawings, plans, and specifications for projects within the city including the development or oversight of engineering projects and studies for the sanitary sewer collection system. Reports to the City Administrator.
Public Works Director	Administers the activities of the Public Works Department and is the LRO for certifying CIWQS reports.
Maintenance Superintendent	Responsible for the field operation and maintenance activities of the Public Works Department including the sanitary sewer collection system. Reports to the Public Works Director.
Public Works Supervisor	Responsible for the oversight of the Public Works Department field service personnel including those crews responsible for the operation and maintenance of the sanitary sewer collection system. Reports to the Maintenance Superintendent.
Maintenance Workers	Responsible for field operation and maintenance activities of the sanitary sewer collection system. These include: response to SSOs, traffic control, assistance with clean-up and other activities as needed. Reports to the Public Works Supervisor.

Code Enforcement Officer	Responds to violations of the City’s Municipal Code. Is responsible to enforce the City’s Municipal Code relative to private property spills that enter the public right of way or incidents where a private property owner causes or contributes to an SSO within the City’s sanitary sewer collection system including violations of the City’s FOG ordinance.
FOG Control Program Manager	Responsible for the implementation, administration and management of the City’s FOG Control Program.
Senior Management Analyst	Responsible for assisting in the development and implementation of the City’s WDR programs and is responsible for the review and revision of these programs.
Finance Department	Responsible for financial oversight including maintaining the City’s sewer service and FOG discharge fees.

3.2 Chain of Communication

The Order requires the chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Care Agency, Regional Water Board, and/or Cal OES).

3.2.1 Compliance Summary

During normal business hours, SSOs are reported to the City’s Public Works Department. The Public Works Supervisor is responsible for responding to the SSO and taking the appropriate action to contain the spill, notify the contractor, assist with cleanup, document the event, notify the appropriate regulatory agencies, and evaluate the cause, effect, and response to the SSO. The Public Works Supervisor will direct Public Works resources as necessary. The Maintenance Superintendent, in conjunction with the Public Works Supervisor will complete the necessary notification and reporting documentation including the online CIWQS reporting. The Public Works Director, as the LRO, will certify all CIWQS reports as required. After normal business hours, SSOs are reported to 911 Dispatch who in turn will contact the City’s emergency standby person. The emergency standby person will provide the initial spill response and will summon the Public Works Supervisor to remediate the situation.

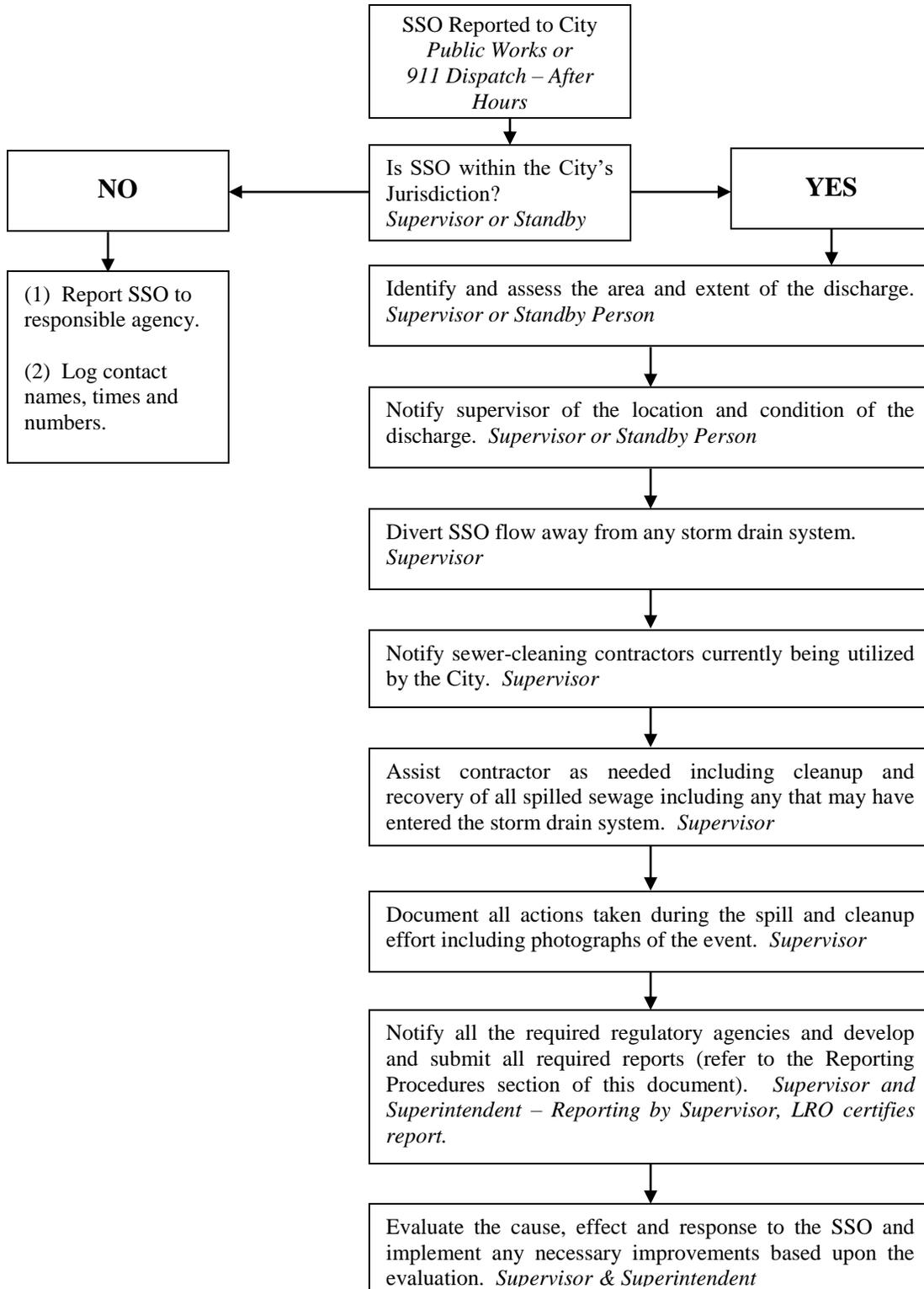
The following flow chart shows the chain of communication for reporting SSOs. It starts with the receipt of a complaint or other information and includes the title of the person responsible for reporting SSOs to CIWQS, SWRCB, Orange County Health Care Agency (OCHCA), and OES. This flowchart is also part of the SSO Reporting Guidelines developed to manage the reporting process and exists in the City’s current SSO Emergency Response Plan. Reporting to

the OES is required for any sewage discharge, of any volume, that reaches (a) surface water or a drainage channel that is tributary to surface waters or (b) reaches an MS4 and is not fully captured and returned to the sanitary sewer system or otherwise captured and properly disposed of. Any volume of wastewater not recovered from the municipal separate storm system is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or ground water infiltration basin (e.g. infiltration pit, percolation pond).

In September 2013, the SWRCB changed the reporting of SSOs from appearance-based to event-based. Under the event-based system one SSO report is required for each SSO that occurs regardless of the number of appearance points although each appearance point must be noted in the report. Previously, a separate SSO report had to be filed for each appearance point sometimes requiring numerous SSO reports for the same SSO event.

Reporting to CIWQS of private lateral sewer discharges (PLSD) is voluntary. PLSDs are sewage discharges that occur from private sewer lateral or other privately-owned sewer assets. The City is not responsible for private lateral discharges but may voluntarily report them to the CIWQS Online SSO Database as the City becomes aware of them. The City is encouraged to provide notification to Cal OES for PLSDs greater than 1,000 gallons or that discharge to surface waters. If a PLSD is reported by the City, the City must identify that the sewage discharge is from a private sewer system asset and should identify the responsible party if known. Certification of PLSDs by the City is not required.

**City of Placentia
SSO Procedures Flow Chart**



3.2.2 Compliance Documents

Reporting of all unauthorized discharges from the City’s sanitary sewer collection system is required by the Order (Order No. WQ 2013-0058-EXEC). Reporting requirements, procedures and agency contact names/phone numbers are included in the City’s SSO Emergency Response Plan, included in Appendix D in Volume II of this SSMP.

3.2.3 Roles and Responsibilities

The roles and responsibilities of each chain (position) in the line of communications are described below:

Public Works Director	Administers the activities of the Public Works Department and is the LRO for certifying CIWQS reports.
Maintenance Superintendent	Is responsible for the field operation and maintenance activities of the Public Works Department including the sanitary sewer collection system and provides response to SSOs. Reports to the Public Works Director.
Public Works Supervisor	Is responsible for the oversight of the Public Works Department field service personnel including those crews responsible for the operation and maintenance of the sanitary sewer collection system. This person may assist in the preparation of SSO reports to the CIWQS database. Reports to the Maintenance Superintendent.
911 Dispatch	Is responsible for receiving SSO reports after normal City business hours and notifying the Emergency Standby Person of the SSO.
Emergency Standby Person	Is responsible for responding to SSOs after normal City business hours. This person will initiate procedures to protect the MS-4 system from receiving sewage and will notify the Public Works Supervisor to remediate the spill.

LEGAL AUTHORITY

This chapter describes the legal authority required to implement the SSMP plans and procedures.

The SSMP must include the legal authority, through sewer use ordinances, service agreements, or other legally binding procedures, to:

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

4.1 Compliance Summary

The City's legal authority to operate and maintain its sanitary sewer collection system is within its Municipal Code. As part of its Municipal Code, the City has adopted the California Plumbing Code (CPC) which, together with the Municipal Code (a) prohibit illicit discharges into the City's sanitary sewer collection system; (b) require that sewers and connections be properly designed and constructed; (e) provide enforcement for violations. By adopting the CPC, which includes requirements for the proper construction, connections, materials, etc., the City requires that all sewers and connections be properly designed and constructed as per the CPC. Likewise, the CPC outlines and requires the proper installation, testing and inspection of new and rehabilitated sewers. Additionally, the City utilizes the Standard Publication for Public Works Construction, – "Greenbook" for pipeline construction standards and inspections. Pipeline and other appurtenance construction guidelines are provided by the Standard Plans for Public Works Construction, current edition, and the City's Sewer Notes. These publications are maintained at the City's Engineering Division of the Public Works Department. The City enforces the codes through its building inspectors and building permit process. The City also requires that only California registered professionals provide service where required by law.

The City has an active FOG regulation (d) to limit the discharge of FOG into its sanitary sewer collection system and maintains easements (c) for facilities that are not located within the public right of way.

The City has an inflow and infiltration (I&I) control program as part of its ongoing line cleaning and maintenance program including CCTV and other mechanisms to detect and eliminate I&I. The CPC (714.2) prohibits the unauthorized discharge of rain, surface or subsurface water into

the sanitary sewer collection system. Municipal Code Section 1.08.020 provides for the enforcement of the City’s Municipal Code.

The WDR requires that the City have the legal authority in the following areas:

Legal Authority Order Requirements	Applicable Sections of City Municipal Code/ California Plumbing Code
a. Preventative illicit discharge into its sanitary sewer system (examples may include I/I, storm water, chemical dumping, unauthorized debris, and cut roots, etc.)	California Plumbing Code Chapter 7, Section 714.0, Damage to Public Sewer or Private Disposal System
b. Require that sewers and connections be properly designed and constructed	Chapter 22.48.030 – Sanitary Sewers
c. Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency	Chapter 16.12.140 – Maintenance of the Sewer Laterals Chapter 16.24.050 - Monitoring, Reporting, Notification and Inspection Requirements
d. Limit the discharge of fats, oils, grease, and other debris that may cause blockages	Chapter 16.24.020 – General Limitations, Prohibitions and Requirements on Fats, Oils and Grease Discharges CPC Section 714.1 – Unlawful Practices
e. Enforce any violation of its sewer ordinances	Chapter 1.08 – General Penalty; and Chapter 16.24.060 – Enforcement (FOG)

4.2 Compliance Documents

The legal authority for enacting the SSMP programs and policies are included in the City’s Municipal Code. These, and other Ordinances adopted to amend existing ordinances, may be reviewed at the City’s Administrative Offices located at 401 East Chapman Avenue, Placentia, CA 92870. The City’s Municipal Code is also available on the City’s website www.Placentia.Org.

- Title 1 establishes the basic enforcement process for the Code with individual Titles providing additional enforcement procedures.
- 5.24.140 establishes the City’s Sewer Service Fee to provide revenue for the operation and maintenance of the sanitary sewer collection system.
- Title 16 is devoted to sewers and storm water with 16.24 being the City’s FOG regulation, all of which is included as Appendix E of Volume II of this SSMP.
- Title 20 is Building Codes and Regulations with 20.12 adopting the 2016 California Plumbing Code.

- Easements are maintained by the City’s Engineering Department for facilities not located within the public right of way.
- Publication for Public Works Construction, current edition – *Greenbook* is available at the Engineering Division of the Public Works Department.
- Standard Plans for Public Works Construction, current edition are available at the Engineering Division of the Public Works Department.
- City’s Sewer Notes are available at the Engineering Division of the Public Works Department.
- I&I control is per the 2016 California Plumbing Code. Chapter 20.12 of the Municipal Code adopts the 2016 California Plumbing Code and is located in Appendix E of this SSMP. The City’s I&I Control Program is part of the City’s Sanitary Sewer Preventive Maintenance Program, located in Appendix F of Volume II of this SSMP.

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OPERATIONS AND MAINTENANCE

The Enrollee shall properly manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.

The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:

1. Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable storm water conveyance facilities;
2. Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;
3. Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;
4. Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
5. Provide equipment and replacement part inventories, including identification of critical replacement parts.

5.1 Mapping

The requirement for this section is to maintain an up-to-date map of the sanitary sewer collection system showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and storm water conveyance facilities.

5.1.1 Compliance Summary

During the summer of 2013, the City invested in a computer based Geographic Information System (GIS) that currently contains mapping for the sanitary sewer collection system. As part of the project, the City had to verify the location of pipelines, pipe size, pipe material, manholes, and direction of flow of the City's collection system assets. The City's sewer GIS was further updated as part of the 2018 Sanitary Sewer Master Plan and Condition Assessment. The system is capable of generating up-to-date map books containing paper copies of the sanitary sewer collection system. The City also maintains GIS of the storm drain system which, along with the collection system GIS, is available to maintenance personnel. The GIS can be accessed either at City Hall or the City's maintenance yard.

The City maintains paper maps of its sanitary sewer collection system. This includes the Tract As-Built maps showing both the sanitary sewer collection system and storm drain systems. These maps are housed in the Engineering Division of the Public Works Department for the City. The maps include the locations of manholes and their ID tags, siphons, easements, property parcels, pipelines, their depth and direction of flow, etc. Maps are periodically reviewed and updated by the City's engineering consultant and Engineering Division of the Public Works Department.

The City completed its latest Storm Drain Master Plan 2000 in January 2001. This master plan includes mapping of the City's storm drain system and an analysis of the storm water conveyance system. The City also maintains atlas maps of the storm drain system. Like the sewer atlas maps, the storm drain atlas maps are housed in the Engineering Division of the Public Works Department. Copies of both the sewer atlas and storm drain atlas maps are kept in the Public Works first responder's vehicles, which are available to the City's Public Works Maintenance Workers. These maps are periodically reviewed and updated.

5.1.2 Compliance Documents

Original sanitary sewer collection system maps are owned and maintained by the Engineering Division of the Public Works Department. The documents supporting compliance with the requirements for mapping are as follows:

- Tract Maps – available at the Engineering Division of the Public Works Department.
- Sewer Atlas Maps - located within first responder's vehicles, at the Public Works Corporation Yard, and at the Engineering Division of the Public Works Department.
- Storm Drain Atlas Maps - located within first responder's vehicles, at the Public Works Corporation Yard, and at the Engineering Division of the Public Works Department.

- Sewer and Storm Drain GIS – Access available at City Hall and the Public Works Maintenance Yard.
- 2000 Storm Drain Master Plan – located at the Engineering Division of the Public Works Department.
- 2018 Sewer Master Plan and Condition Assessment – located at the Engineering Division of the Public Works Department.

5.2 Preventive Maintenance Program

The Order requires the City to describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer collection system with more frequent cleaning and maintenance targeted at known problem areas. The Preventive Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders.

5.2.1 Compliance Summary

The operation and maintenance of the City's sanitary sewer collection system is the responsibility of the City's Department of Public Works. Due to the small size of the City's Public Works staff, maintenance of the sanitary sewer collection system is performed via outside contract with Public Works personnel providing oversight. To comply with the requirements of the WDR and to assist the City's Public Works staff in ensuring that the sanitary sewer collection system is properly operated and maintained, the City has developed a comprehensive written Preventive Maintenance Program (located in Appendix F of Volume II). The Preventive Maintenance Program describes how the City's sanitary sewer collection system is to be operated and maintained paying particular attention to preventive and predictive maintenance, inspection, enhanced maintenance areas and record keeping. The Preventive Maintenance Program includes a Sewer Line Cleaning Guide, Sewer Line Inspection Guide and Infiltration and Inflow Reduction Plan. The Line Cleaning Guide includes specifications for the quality of line cleaning the City expects from its line cleaning contractor(s). The Sewer Line Inspection Guide outlines the requirements that the CCTV contractor must adhere to. The Infiltration and Inflow (I&I) Reduction Plan outlines the methodology of the City's I&I Reduction Program.

The City of Placentia, while under the Santa Ana Regional Water Quality Control Board's WDR, revamped its sanitary sewer collection system's operation and maintenance program. Since that time the City has further evaluated the maintenance needs of its sanitary collection system and has revised the line cleaning program to meet the needs of the sanitary collection system. Under the current program the City cleans all of its sanitary sewer collection system lines every two years. Areas that have been deemed as requiring enhanced maintenance are cleaned every quarter or more frequently if needed (current Enhanced Maintenance Area list included in Appendix F). The City has CCTV inspected 100% of its sanitary sewer collection system and is currently committed to re-inspecting the system at a rate of approximately 14-20% per year, or the entire system every 5 to 7 years. Based upon this inspection and

evaluation, routine maintenance is tailored to meet the actual needs of the system including updating the City's capital improvement program (CIP) for system rehabilitation and replacement.

Funding for the operation and maintenance of the City's sanitary sewer collection system is provided by the City's sewer service fee. The sewer service fee was adopted by the City Council in April 2005 and is dedicated to providing necessary funds for the sanitary sewer collection system. The City is currently conducting a sewer rate study and anticipate implementation of the new sewer service fee in 2020.

Reporting of all unauthorized discharges from the City's sanitary sewer collection system is required by the Order (Order No. WQ 2013-0058-EXEC). Sewer spill reporting requirements and procedures are listed in Sections 3.2.1 and 3.2.2.

5.2.2 Compliance Documents

Documents which support compliance of this section include the following:

- Sanitary Sewer Preventive Maintenance Program – included as Appendix F in Volume II of this SSMP.
- Sewer Line Cleaning Guide – included as part of the Sanitary Sewer Preventive Maintenance Program located in Appendix F of Volume II of this SSMP.
- Sewer Line Inspection Guide - included as part of the Sanitary Sewer Preventive Maintenance Program located in Appendix F of Volume II of this SSMP.
- Infiltration and Inflow (I&I) Reduction Plan - included as part of the Sanitary Sewer Preventive Maintenance Program located in Appendix F of Volume II of this SSMP.
- Sanitary Sewer Overflow Emergency Response Plan – included in Appendix D of Volume II of this SSMP.
- Capital Improvement Plan – available at the Public Works Department.
- Sanitary sewer collection system inspection videos – available at the Public Works Department.

5.3 Rehabilitation and Replacement Plan

Every Enrollee is responsible for developing a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and CCTV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. The rehabilitation and replacement plan should include a CIP that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan.

5.3.1 Compliance Summary

As the system ages, replacement or rehabilitation is required. To address this issue the City has developed Replacement/Rehabilitation Plan for its sanitary sewer collection system (Appendix H of Volume II). This plan calls for the replacement or rehabilitation of the sanitary sewer collection piping and manholes based upon the materials used and the date that each segment was placed in service. The City's collection system is divided into six geographical drainage areas (see map in Appendix H). Each drainage area is defined by its geographic location, tract development within the drainage area, and the drainage areas relationship to the Orange County Sanitation District (OCSD) interceptor system. Initial replacement/rehabilitation target dates were established based upon the engineered life expectancy of the materials used in the manufacturing of the pipelines and other appurtenances within each drainage area.

While the City was under the requirements of the RWQCB's WDR the City engaged an aggressive CCTV inspection program to establish a baseline assessment of the actual condition of the City's sanitary sewer collection system. The City has successfully conducted CCTV inspection of its entire system and continues to update its inspection data by CCTV re-inspecting its entire sewer collection system every 5 to 7 years. Data from the initial and subsequent CCTV inspections is used to target pipeline deficiencies and to update the City's Replacement/Rehabilitation Plan as well as the 2018 Wastewater Master Plan Update, which was used to develop the City's most current CIP with both condition and capacity-related deficiencies. Through this process, previously unknown pipeline defects were discovered and both higher risk (high priority, short-term projects) and lower risk (medium priority, longer-term projects) were developed in the process. As part of the condition assessment component, defective pipe segments were rated and prioritized then added to the CIP list for the appropriate engineering solution. The City uses the NASSCO pipeline assessment standards for assessing its sanitary sewer collection system pipeline condition.

Funding is provided for the replacement/rehabilitation of the City's sanitary sewer collection system by the sewer service fee. The sewer service fee is currently being reevaluated through a sewer rate study with an updated sewer service fee anticipated to be implemented in 2020.

5.3.2 Compliance Documents

The documents supporting compliance with the rehabilitation and replacement plan requirements are as follows:

- Sewer Line Inspection Guide - included as part of the Sanitary Sewer Preventive Maintenance Program located in Appendix F of Volume II of this SSMP.
- Replacement and Rehabilitation Plan – included in Appendix H of Volume II of this SSMP
- Annual City Budget – available at the Placentia City Hall.
- Current Capital Improvement Plan – available at the Public Works Department.
- Sanitary sewer collection system inspection videos – available at the Public Works Department.

5.4 Training Program

The City is required to provide training on a regular basis for staff in sanitary sewer collection system operations and maintenance, and to ensure that contractors to be appropriately trained.

5.4.1 Compliance Summary

The City has an ongoing training program for its Public Works employees. As part of this program, the Public Works field employees attend periodic WDR Awareness Training Workshops held at the City Yard. An abbreviated WDR Awareness Training program was presented to all other City personnel. City Public Works field employees have undergone, and continue to receive, SSO Response Training held in conjunction with the City's storm water program at OCSD's SSO Response Training Facility. Confined Space Safety and other safety training is offered to the City's Public Works employees throughout the year. Public Works employees have attended seminars for regional sewer spill response and have attended the CWEA SSO Reporting Workshop. Employees have also participated in the NASSCO Pipeline Assessment and Certification Program.

Contractors providing service to the City for its sanitary sewer collection system must demonstrate to the City that their employees are adequately trained in sanitary sewer collection system maintenance techniques, confined space safety, and can properly operate the equipment they utilize. The City will obtain, and maintain on record, training records for their pipeline contractor on an annual basis to ensure their pipeline contractor is sufficiently trained.

5.4.2 Compliance Documents

The following documents demonstrate the type of training provided to staff and what training requirements are required of contractors:

- City employee training records are maintained in their personnel files – available at the Placentia City Hall
- Pipeline contractor training records – available at the Department of Public Works

5.5 Equipment and Parts Inventories

Each Enrollee is required to provide equipment and replacement part inventories, including identification of critical replacement parts for the operation and maintenance of its sanitary sewer collection system.

5.5.1 Compliance Summary

The City of Placentia's sanitary sewer collection system is a gravity-based system. Being gravity based, the transport of sewage does not require any pumping or force mains. The City's pipelines are almost entirely vitrified clay pipe (VCP) of standard, commonly available sizes. There are no known critical components (components that require special manufacturing or have excessive lead times when ordering) within the City's sanitary sewer collection system. Additionally, the City contracts out for all of its line cleaning and any required system rehabilitation or repair. For these reasons, the City does not maintain any inventory of pipeline components. As the City does fulfill the roll of first responder to SSOs, the City maintains response vehicles equipped with the necessary equipment to divert and / or contain spills until the necessary contractor arrives. As part of the SSO Emergency Response Plan (SSOERP or ERP), the City maintains a list and contact information of line cleaning and pipeline contractors. The City currently utilizes Val Verde Construction for any emergency pipeline repair needs.

5.5.2 Compliance Documents

The documents supporting compliance with the requirement to maintain an inventory of equipment and parts including the identification of critical parts are as follows:

- Response Equipment Inventory – list of City vehicles maintained at the Department of Public Works.
- List of Contractors – available in the SSOERP and Department of Public Works

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DESIGN AND PERFORMANCE PROVISIONS

This chapter references the design and construction standards & specifications for new sewer systems, pump stations, and other appurtenances, and for the rehabilitation and repair of existing sewer systems. Also included are the procedures and standards for the inspection and testing of these facilities. The Order requires the following:

1. Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and
2. Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

6.1 Compliance Summary

The City utilizes the services of a licensed California registered engineer to assist with new construction, replacement or rehabilitation of the City's sanitary sewer collection system. The City also maintains a draftsman position to assist with on-site construction inspections and updating system drawings and as-builts. The City has also adopted the California Plumbing Code (CPC) and requires that all construction meet the required standards and specifications. Construction management may be outsourced to a qualified firm or individual. To assist City personnel, the City utilizes:

- The 2016 California Plumbing Code (CPC),
- Standard Publication for Public Works Construction, current edition – Greenbook for pipeline inspections,
- Standard Plans for Public Works Construction, current edition, and
- City's Sewer Notes for sewer pipeline and facilities construction.

Current work is guided by these various standards and specifications that are on file and subject to change as needed. Design work is performed by a licensed professional California registered engineer for construction and or rehabilitation and replacement projects. Contractors must be licensed and insured.

6.2 Compliance Documents

The documents used for design and performance evaluations include the following:

- California Plumbing Code – located at the Engineering Division of the Public Works Department.

- Standard Publication for Public Works Construction, current edition – Greenbook - located at the Engineering Division of the Public Works Department.
- Standard Plans for Public Works Construction, current edition – located at the Engineering Division of the Public Works Department.
- City’s Sewer Notes – located at the Engineering Division of the Public Works Department.

OVERFLOW EMERGENCY RESPONSE PLAN

Under the Order, each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

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

7.1 Compliance Summary

The City of Placentia has an SSO Emergency Response Plan (SSOERP) in compliance with the requirements of the WDR, last updated in 2019. A copy of the SSOERP is located in Appendix D of Volume II of this SSMP.

The City's SSOERP consists of detailed instructions for City personnel for responding to an SSO or any other type of unauthorized spill within the City's jurisdiction. The SSOERP includes notification procedures, personnel callout lists, contractors and other resources that may be needed to respond to a spill. The SSOERP also includes descriptions of the duties that the City's first responders and supervisors are responsible to perform.

Although the City does not have any impounded water bodies within its jurisdiction that might require a Portable Aeration Plan, there is a potential for an SSO to migrate through the City's MS-4 system to either the Santa Ana River or Carbon Creek. The City, via its participation on

the OC WDR Steering Committee, has assisted OCSD in the development of the Portable Aeration Report.

7.2 Compliance Documents

The compliance documents that detail the agency's Overflow Emergency Response Plan are as follows:

- SSO Emergency Response Plan - is included in Appendix D of Volume II of this SSMP.
- Portable Aeration Plan – located in the Department of Public Works as well as in Appendix D of Volume II of this SSMP.

FATS, OILS, AND GREASE CONTROL PROGRAM

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

- (a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- (b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;
- (c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- (d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- (e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;
- (f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- (g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

8.1 Compliance Summary

The City of Placentia recognizes that historically 38% of the SSOs having a known cause within the City's sanitary sewer collection system were due to an accumulation of FOG. Likewise, many of the City's enhanced maintenance areas are FOG related. As a preventative measure, these enhanced maintenance areas are on an enhanced cleaning schedule being cleaned at least quarterly. With the adoption of the WDR, the City developed and implemented a comprehensive FOG Control Program. This is a permit-based program affecting all food service establishments (FSEs) that discharge into the City's sanitary sewer collection system. This program and its supporting FOG Control Ordinance are derivatives of the model FOG Control Ordinance and program developed by OCSD in conjunction with the OC WDR Committee. The Ordinance and program require that all FSEs must install an approved grease interceptor. The Ordinance and program, on a case-by-case basis, allows for variances and

waivers under limited specified conditions with the approval of the City's FOG Control Program Manager. All FSEs are required to utilize kitchen best management practices. Each FSE has been provided with a FOG Program handbook that includes information on the FOG Control Program, FSEs responsibilities, best management practices, employee training aids, frequently asked questions (in both English and Spanish) and record keeping materials (all information also available on the City's website). Enforcement is provided through a series of inspections with the ability to issue citations or take other necessary steps to ensure compliance with the program. These inspections were initiated with the programs adoption and are ongoing. The City has a goal of completing at least one inspection per FSE per year.

A FOG Characterization Study was performed to identify areas of FOG concentration. In this study, FSEs were inventoried and their relationship to known enhanced maintenance areas was plotted. The City intends to use the FOG Characterization Study as a measure of the FOG program's effectiveness and will update the study as additional information becomes available.

FOG disposal is through the OCSD treatment plant in Fountain Valley. FOG collected through line cleaning or the cleaning of grease interceptors within the City is taken to OCSD for treatment. FSEs must use licensed grease haulers to clean and transport material removed from grease interceptors.

Manifests for cleaning and grease removal must be maintained by the FSEs and are reviewed during the City's inspections. Inspections may be conducted by City staff or by a contractor hired by the City.

The City utilizes its newsletter and other public events to inform the public of the necessity to properly dispose of residential FOG.

8.2 Compliance Documents

The FOG Control program activities are documented under the following ordinances, reports, and studies:

- FOG Control Ordinance - included as Appendix I in Volume II of this SSMP.
- FOG Control Program - included as Appendix J in Volume II of this SSMP.
- FOG Characterization Study - included as Appendix K in Volume II of this SSMP.
- FSE FOG Handbook – available from the FOG Program Manager.
- FOG Disposal Alternatives Report – In-Plant FOG Impact Study (OCSD) – located at the office of the FOG Program Manager.

SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

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

1. **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
2. **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (1) above to establish appropriate design criteria;
3. **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding; and
4. **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (1)-(3) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section 10 – Monitoring, Measurement and Program Modifications.

9.1 Compliance Summary

Evaluation: The Placentia sanitary sewer collection system is divided into six (6) geographical drainage areas, consistent with tract development within those drainage areas, and their relationship to the OCSD interceptor system. Each drainage area is independent of the others and connects to the OCSD system at various locations. Sewage collected in each area flows to the OCSD interceptor pipelines where it is transported to OCSD's treatment facilities. These areas developed at different times as the City changed from a primarily agricultural area into a residential community. Because each basin is independent, development within a basin only affects the capacity of that basin and not the remainder of the sanitary sewer collection system. The City is almost 100% built out.

In 2000, the City had a flow study conducted to determine the actual wastewater generation factors from the various types of sanitary sewer collection system users within the City. The data was used to calibrate a model of the collection system to determine if sufficient capacity exists. At that time, 20 of the City's 44 reaches were modeled. In the first quarter of 2005, as part of the City's 2005 Sewer Master Plan Update, the City contracted to have the model re-run for all 44 reaches of the collection system. Results were incorporated into the City's Capacity Assurance Plan as part of its Region 8 SSMP. Those pipe segments that the model indicated as being under capacity were added to the City's CIP in 2005. Field studies were also conducted to measure the actual flow levels at different times of the day over a period of one week for those pipe segments that the model indicated as not having sufficient capacity. This assisted the City in prioritizing projects as the computer model is a projection of flow conditions. The City of Placentia historically has not experienced capacity-related issues in the sanitary sewer collection system, nor are they currently.

In 2009 the City completed an aggressive CCTV inspection program. Over a period of 2½ years the City CCTV inspected its entire sanitary sewer collection system. This has established a baseline condition assessment for the sanitary sewer collection system. Re-inspections are conducted at a rate of approximately 14-20% of the system per year (or full system every 5 to 7 years).

During the summer of 2013, the City installed a comprehensive GIS system for its sewer collection and storm water systems. The GIS system allows the City to easily access maintenance data, including video inspections of the sanitary sewer collection system pipeline segments.

In 2018, as part of a Sewer Master Plan Update, the City developed updated design and evaluation criteria, as well as an updated hydraulic model. A three-week flow monitoring program was utilized to calibrate the existing dry weather hydraulic model scenario and to assess I/I impacts to the system. No significant wet weather response was captured for the flow monitoring period and so wet weather flow monitoring data from OCS D was utilized to determine the peak wet weather flow scenario. Results of the existing system capacity evaluation indicated that approximately 2% of pipes show capacity deficiencies under existing peak dry weather flow conditions and approximately 15% of pipes show capacity deficiencies under existing peak wet weather flow conditions. The Sewer Master Plan capacity evaluation effort resulted in seven (7) capacity related CIP projects totaling \$13.8M.

Design Criteria: The City utilizes industry standards as the design criteria for its sanitary sewer collection system. All design work is conducted by registered California professional engineers and all contractors are required to be licensed and insured. The City requires that all design be compliant with the latest edition of the California Plumbing Code (CPC) supplemented by the Standard Publication for Public Works Construction (Greenbook), Standard Plans for Public Works Construction (current edition), and the City's Sewer Notes to establish standards of work, material and construction procedures for improvements to the City's sanitary sewer collection system. The system is designed to handle projected dry and wet weather peak flows. Design standards created as part of the 2018 Sewer Master Plan Update. The sewer design criteria for the City are shown in the following table.

Design Criteria	City of Placentia
Minimum Size	8-inches
Minimum Slope (8")	0.40%
Minimum Slope (12" and larger)	0.24%
Manning's "n"	0.013
Minimum Velocity (ft/s)	2
Maximum d/D ¹ (<12") at PWWF	0.5
Maximum d/D (12" and larger) at PWWF	0.75
Maximum Distance between Manholes (ft)	300
Notes:	
¹ d/D = ratio of depth of water to the diameter of the pipe	

Capacity Enhancement Measures: The City has incorporated several capacity enhancement measures into its sanitary sewer collection system. The City has an Infiltration and Inflow (I&I) program to prevent storm water or groundwater from entering the system. The I&I program is designed to identify and eliminate sources of I&I within the City's sanitary sewer collection system through the selective use of smoke testing, flow monitoring, and CCTV. As part of this program, the City completed the Walnut Drainage Project in 2009. This project eliminated a severe drainage issue that occurred during heavy rain events causing flooding and inundation of the sanitary sewer collection system in the Walnut Avenue area. The City's CCTV inspection program and proactive line cleaning program ensure the sanitary sewer collection system can handle designed flows. The CCTV inspection program provides the City with visual data on internal deficiencies while the line cleaning program keeps the sanitary sewer collection lines free of accumulations of FOG, roots, and other debris. The City has also established a minimum size of 8-inch diameter pipe for sewer mains.

In 2019, the City revised and updated its CIP. The updated CIP includes \$16 million in capital improvements for the sanitary sewer collection system. These projects are a combination of pipe deficiencies and capacity issues. The CIP was updated based upon the findings of the 2018 Sewer Master Plan Update.

Schedule: The City's current CIP lists improvements to the sanitary sewer collection system for the next seven years. The CIP is periodically reviewed with changes being made to the project list and start dates to meet the changing needs of the City. The CIP also contains budgetary cost projections for the listed projects. Funding is provided for the replacement/rehabilitation of the City's sanitary sewer collection system by the Sewer Enterprise Fund balance. Grants and bond sales are additional means the City can utilize to fund its CIP projects.

9.2 Compliance Documents

The documents used for system evaluation and capacity assurance are as follows:

- 2018 Wastewater Master Plan included as Appendix G in Volume II of this SSMP and located at the Public Works Department.
- Replacement and Rehabilitation Plan – included in Appendix H of Volume II of this SSMP.
- Capital Improvement Plan – available at the Public Works Department.
- Inflow and Infiltration Reduction Plan – part of the City’s Operation and Maintenance Program.
- City General Plan – located at the Placentia City Hall.
- Computer GIS – accessible at City Hall and the Public Works Yard.

MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

The Enrollee shall monitor and measure the effectiveness of the SSMP and shall make modifications as necessary to maintain the program's effectiveness. Under the Order, the Enrollee shall:

- (a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
- (b) Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;
- (c) Assess the success of the preventative maintenance program;
- (d) Update program elements, as appropriate, based on monitoring or performance evaluations; and
- (e) Identify and illustrate SSO trends, including: frequency, location, and volume.

10.1 Compliance Summary

City staff reviews the maintenance activities and programs necessary for the efficient operation of the sanitary sewer collection system. This data is used to determine if the City's activities are sufficient to meet the stated goals of the SSMP. Line cleaning records provided by the City's contractor are reviewed for abnormalities such as increased grease accumulation or root growth. Likewise, the cleaning records of the enhanced maintenance areas are reviewed for changes. When spills occur, their source is identified, and appropriate action taken to ensure future spills do not occur at the same location with the same cause. Spill response is reviewed and modified if necessary. O&M costs are carefully monitored to ensure sufficient funds are being provided by the sewer service fee. CCTV inspection videos are reviewed as they become available and are compared to the established baseline videos to track changes in the system. The FOG program is periodically reviewed for its effectiveness in reducing FOG related SSOs. The City is an active member in the OC WDR Steering Committee and OC WDR General Group, sponsored by OCSD, with employees attending both meetings and workshops. Information and data on the City's sanitary sewer collection system is always available for audit as provided under the Order. Changes are made as necessary to continually improve the SSMP.

The City of Placentia has been reporting and keeping statistics on SSOs occurring within the City's jurisdiction. Records of individual SSOs (public and private) that occurred under the Region 8 Order were kept in hard copy and a monthly summary on an Excel spreadsheet. Under the Statewide Order all SSOs are reported to the CIWQS online database. A current spreadsheet tracking SSOs over the past 10 years is available in Appendix M of Volume II and includes SSOs by category, volume, cause and enhanced maintenance area location. These data

indicate a 10-year average SSO rate (number of SSOs per 100 miles of system per year) of 0.8, which would categorize the City as having a well performing system. These records are reviewed for source and cause during the investigative process of an SSO and will be utilized to measure of effectiveness of the overall SSMP. Biennial audits review SSO data to identify trends and are used to modify the program elements and/or SSMP implementation to ensure improved system performance. A change log is contained in Appendix B of Volume II of the SSMP to track changes that occur to the document.

10.2 Compliance Documents

The compliance documents are as follows:

- Individual spill reports – located at the City’s Public Works Corporation Yard and on the CIWQS online database.
- Line cleaning and maintenance reports – located at the City’s Public Works Corporation Yard.
- Enhanced maintenance area cleaning reports – located at the City’s Public Works Corporation Yard.
- Employee training records – located at the Placentia City Hall.
- Records retention guidelines – located in Volume II, Appendix L.
- SSMP Performance Tracker spreadsheets – located at the Public Works Department and included in Volume II, Appendix M.
- Order No. WQ 2013-0058-EXEC Amending Monitoring and Reporting Program is located in the SSMP Volume II, Appendix A.

PROGRAM AUDITS

As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

11.1 Compliance Summary

Audits will review the City's SSMP activities from the time of the last audit and will summarize the data accumulated through its monitoring, measuring, and program modification efforts. Particular attention will be paid to each program's effectiveness in meeting its goals, objectives, and priorities while ultimately being tied into the budgetary process.

The audit process will include the review of additions or improvements made to the collection system during the current audit period and describe planned additions and improvements for the upcoming audit period. Supporting documents will be reviewed to ensure they are up to date and the most recent documents are available and referenced. This process will also ensure that historical documents are kept for future reference.

The results of the audit, including identification of any deficiencies and the recommended steps taken or planned to correct them, will be included in the audit report. The audit report will be used in the City's budgeting process when planning future CIP projects.

Employee training will be reviewed to ensure programs and mechanisms are in place to provide necessary training, and that all staff is up to date with required training. Training includes on the job requirements, safety, required licenses and/or certificates, and professional development.

Completed audits are retained on file the Placentia City Hall for a minimum of five years.

11.2 Compliance Documents

The documents used for audit evaluations include the following:

- Individual spill reports – located at the City's Public Works Corporation Yard and on the CIWQS online database.
- Line cleaning and maintenance reports – located at the City's Public Works Corporation Yard.
- Enhanced maintenance area cleaning reports – located at the City's Public Works Corporation Yard.

- Employee training records – located at the Placentia City Hall.
- SSMP Performance Tracker spreadsheet – located in Volume II, Appendix M.
- City’s Record Retention Guidelines – located in Volume II, Appendix L
- City’s annual sanitary sewer collection system budget – located at the Placentia City Hall.
- Current audits are maintained at the Placentia City Hall.

COMMUNICATIONS

The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.

The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

12.1 Compliance Summary

During the development of the original SSMP for Region 8 the City encouraged public participation through the use of newsletters and public events. When the State of California adopted the current statewide WDR, the City updated its Region 8 SSMP to ensure compliance with the State Order. The City continues to communicate with interested parties on the implementation and performance of its SSMP. The communication program allows interested parties to provide input on the program's performance.

The City disseminated public information on the SSMP and its various elements in numerous ways. The City's communication program uses, at a minimum, public meetings, online communications (www.placentia.org), print customer communications, and business/local organizations as a means to communicate with the public. The Volume I of most recent version of the SSMP is available on the City's website. The City of Placentia allows public comment at its City Council meetings. The City is also a participant in the OC WDR Group and, as such, meets on a monthly basis to discuss sewer issues.

The City does accept a small amount of sewage flow from the City of Brea. This is allowed through a long-standing contract between the City of Placentia and the City of Brea. The City also maintains a close relationship with the Yorba Linda Water District which owns and operates the sanitary sewer collection system within the portion of the City that is within the District's jurisdiction. All of the City's sewage flows to the OCSD interceptor system at several locations throughout the City. As with the City of Brea, OCSD and the City of Placentia have a long-standing contract allowing the City to deposit its sewage flow into OCSD's interceptor system.

12.2 Compliance Documents

The documents used for the communications program include the following:

- City's website at www.placentia.org.
- Most current approved SSMP available on the City's website.

- FOG Resources, including Kitchen BMPs, Grease Interceptors fact sheet, FOG Program FAQs and log sheets are available on the City’s website.
- City agreement with the City of Brea – available at the Placentia City Hall.
- City agreement with OCSD – available at the Placentia City Hall or OCSD Administrative Offices.

GENERAL COMPLIANCE

13.1 SSMP and Program Certification

Both the SSMP and the City’s program to implement the SSMP must be certified by the City to be in compliance with the requirements set forth above and must be presented to the City’s governing board for approval at a public meeting. The City shall certify that the SSMP, and subparts thereof, are in compliance with the general WDRs within the time frames identified in the time schedule provided in subsection D.15.

In order to complete this certification, the City’s authorized representative must complete the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form, and sending the form to:

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

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

13.2 Compliance Summary

The SSMP will be presented to the City of Placentia City Council for approval on February 18, 2020. Re-certification of the SSMP will occur every five (5) years from the date of SSMP approval.

13.3 Compliance Documents

The following documents provide the legal basis for the City of Placentia’s approval of the SSMP.

- City of Placentia’s City Council meeting minutes from February 18, 2020 – located at the Placentia City Hall and on the City’s website.
- Approved SSMP – located at the Placentia City Hall and on the City’s website.
- State Water Resources Control Board (SWRCB) Order Number 2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer

Systems – located at the Placentia City Hall and Appendix A in Volume II of this SSMP.

- SWRCB Order No. WQ 2013-0058-EXEC (2013 MRP) – located at the Placentia City Hall and Appendix A in Volume II of this SSMP.