



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

In Reply Refer to: CWA-308-IX-FY01-34
Certified Mail: xxxxxxxx

Blake Anderson
General Manager
Orange County Sanitation District
PO Box 8127
Fountain Valley, CA 92728-8127

Dear Mr. Anderson:

In order to determine compliance with the Clean Water Act (“the Act”), the Environmental Protection Agency (EPA), Region 9 is evaluating the performance of the sanitary sewage collection system tributary to the Orange County Sanitation District’s Reclamation Plant No. 1 and Treatment Plant No. 2 (NPDES Permit No.CA0110604). This information request is part of an EPA Region 9 compliance initiative in which EPA and the California Regional Water Quality Control Boards are gathering information on performance of sanitary sewage collection systems in Southern California.

In this letter, EPA is asking for information that we will use to evaluate compliance with the Clean Water Act, including a description of your sanitary sewage collection system, operation and maintenance practices, and information about any unauthorized spills from your collection system. The discharge of pollutants to waters of the U.S. without a valid National Pollutant Discharge Elimination System (NPDES) permit is a violation of the Clean Water Act.

This letter and the enclosure are a request for information issued pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. 1318(a) (Docket No. CWA-308-FY01-34). Section 308 of the Act authorizes the Regional Administrator of EPA to require those subject to the Act to furnish information, conduct monitoring, provide entry to the Administrator or authorized representatives and make reports as may be necessary to carry out the objectives of the Act. This authority has been delegated to the Chief of the CWA Compliance Office, EPA Region 9. The enclosure, which is hereby made part of this letter, details the information the Orange County Sanitation District must provide to EPA relating to its wastewater collection system.

Unless specified otherwise, all submissions required by the Section 308 information request

are due at this office within sixty (60) days of receipt of this letter and shall be mailed to:

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U.S. Environmental Protection Agency
Clean Water Act Compliance Office (WTR-7)
Water Division
75 Hawthorne Street
San Francisco, CA 94105
ATTN: Mr. Ken Greenberg

and

Ken Theisen
California Regional Water Quality Control Board, Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348

All submittals made pursuant to this Section 308 information request shall also include the following certification signed by a duly authorized representative:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure either to properly respond to this Section 308 information request or to otherwise comply with the requirements of the Clean Water Act could subject the Orange County Sanitation District to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. Section 1319(b)] and/or civil penalties not to exceed \$27,500 per day for each violation.

Under Section 309(g) of the Act [33 U.S.C. Section 1319(g)], any violation of the Act could subject the Orange County Sanitation District to an administrative penalty action of up to \$11,000 per day of violation not to exceed \$137,500. In addition, Section 309(c) of the Act [33 U.S.C. Section 1319(c)] provides for criminal penalties in the event of either negligent or knowing violations of the Act. Negligent violations of the Act are punishable by a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or imprisonment for not more than one year, or both. Knowing violations of the Act shall be punished by a fine of not less than \$5,000 nor more than \$50,000 per day of violation, or imprisonment for not more than three years, or by both [33 U.S.C. Section 309(c)(2)].

This request for information is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an “information collection request” within the meaning of 44 U.S.C. sections 3502(3), 3507, 3512, and 3518(c)(1) See also 5 C.F.R. sections 1320.3(c), 1320.4, and 1320.6(a).

Should you have any questions regarding this matter, please contact Mr. Ken Greenberg of my staff at (415) 744-1868.

Sincerely,

Tom Huetteman, Chief
Clean Water Act Compliance Office
Water Division

Enclosure A

cc: Nick Arhontes, Orange County Sanitation District
Gerard Thibeault, California Regional Water Quality Control Board, Santa Ana Region
Ken Theisen, California Regional Water Quality Control Board, Santa Ana Region

Enclosure A

Orange County Sanitation District
Section 308 Information Request
CWA-308-IX-FY01-34

Unless otherwise specified below, within sixty days of receipt of this information request the Orange County Sanitation District shall submit to EPA Region 9 and the California Regional Water Quality Control Board, Santa Ana Region, the following information relating to its sanitary sewage collection system:

1. A description of the sanitary sewage collection system owned and operated by the Orange County Sanitation District that includes the following information:
 1. description of the service area including names of cities and communities served,
 2. approximate population served,
 3. average daily flow,
 4. the total length of sewers,
 5. size range of pipe diameters,
 6. number of and a description of sewage pump stations,
 7. a map of the sewage collection system showing the locations of primary sewers (interceptor, outfall & truck sewers), and sewage pump stations, and
 8. range and average age of sewers.

2. A description of your sewage collection system management, operations, and maintenance practices, including the following:
 1. Management Program
 1. The organizational structure of departments responsible for the sewage collection system.
 2. The legal authorities and ordinances governing use of the sewage collection system (brief description, not including the industrial pretreatment program).
 3. Adequacy of sewer system maps and availability of maps to maintenance crews. Do system maps accurately reflect sewer pipe locations and construction?
 4. Are sewer maps available in a Geographic Information System (GIS) format?
 5. Describe the system used for tracking and responding to public complaints related to your sewage collection system.
 6. Describe how the annual maintenance budget is determined. If a list of maintenance requirements has been developed, describe the items on the list which remain unfunded due to budget shortfalls.
 7. Provide a summary of your annual budget for system operations, maintenance, and capital improvements.
 8. Provide your staffing levels for collection system

management, administration, operations, and maintenance. Indicate if you use contractors to implement your system operations and maintenance tasks.

2. Spill Response, Reporting, and Record Keeping
 1. Provide copies of your spill response plans and spill reporting and record keeping procedures. If you do not have written plans and procedures, describe your practices.
 2. Describe measures to ensure that all sewage spills are detected and brought to the attention of spill response staff.
 3. Provide a list of emergency response equipment (such as portable pumps and generators) which you own or have access to for responding to sewage spills.
 4. Describe your procedures for protecting storm drains from sewage spills and notifying the storm water quality protection authorities of spills that impact their storm drains.
3. Sewage Pump Stations
 1. Indicate the number of spills from sewage pump stations in the last five years.
 2. Describe the reliability and adequacy of sewage pump station design and operations, including hydraulic capacity, redundant systems, alarms, and backup power.
4. Maintenance Program
 1. Describe the maintenance management system used, including procedures for identifying trends and problem areas and for prioritizing and scheduling routine, preventive, and corrective maintenance and cleaning. Indicate if you use a computerized maintenance management system.
 2. Provide the average miles of sewer pipe cleaned annually over the past five years (or fewer years if data not available), and provide the average percentage of your total sewer pipe miles cleaned at least once annually over the past five years (or fewer years if data not available). Provide the frequency in years in which you clean your entire collection system. (Include root removal or control in these figures).
 3. Provide the average miles of sewer pipe receiving root removal or control annually over the past five years (or fewer years if data not available), and provide the average percentage of your total sewer pipe miles receiving root removal or control at least once annually over the past five years (or fewer years if data not available).
 4. If you have identified trouble spots in your collection system, how often are the trouble spots

- cleaned?
5. Describe the system for tracking and responding to odor complaints. Describe the program for monitoring or assessing odors from your collection system. Describe identified odor problem areas and any ongoing efforts to control odors from your collection system.
5. Source Control Program
 1. Do you have an ordinance that limits or requires control of fats, oils, and grease introduced to your collection system by restaurants and food processing facilities? Provide a copy of your ordinance and related regulations, policies, and guidance.
 2. Describe your current grease source control program, including implementation of any grease control ordinances, permitting, inspections and enforcement. Provide the number of staff working on your grease source control program. Of this number, how many spend half or more of their time directly implementing the grease source control program.
 6. Sewer Inspection, Condition Assessment, and Rehabilitation Program
 1. Describe the program and methods used to inspect and assess the condition of your sewers. Do you own or have access to Closed Circuit T.V. equipment for inspecting sewer pipes?
 2. For each method of sewer pipe inspection (visual, CCTV, etc.), indicate the miles and percentage of your sewage collection system inspected and assessed annually. Indicate the number of miles or percentage of your system for which you have completed a condition assessment. If you have completed a condition assessment of your entire system, indicate when this assessment was completed.
 3. Describe your program for rehabilitating or replacing defective or deteriorated sewers. Indicate the number of miles of sewer planned for rehabilitation or replacement over the next five years.
 7. Capacity Assurance Program
 1. Explain how sewer system hydraulic capacity is evaluated, including the effects of infiltration and inflow (I&I).
 2. Explain whether the system has experienced overflows resulting from capacity restrictions due to excessive I & I, dry weather flow increases, or undersized pipes or pump stations. Indicate the major cause of capacity related overflows in your system.
 3. Have you completed an assessment of infiltration

and inflow in your collection system. Did the assessment address both groundwater infiltration and rainfall derived infiltration and inflow? Describe what methods were used to complete the I & I assessment (i.e., flow monitoring, smoke testing, etc.). Describe the major findings of your I & I assessment.

4. Describe the system for monitoring flow in your collection system including permanent or temporary flow meters in the sewer pipes or at sewage pump stations.
 5. Describe the model or other system for predicting flow and available capacity in your collection system.
 6. Describe the program used for planning, funding, and constructing additional capacity needed for your system.
 7. Indicate any plans over the next five years for constructing relief sewers.
8. Capital Improvement Program
1. Describe the program for identifying, prioritizing, funding, and constructing necessary capital improvements, including sewer pipe rehabilitation or replacement and construction of relief sewers. Do you have a sewer system Master Plan?
 2. What is the planning horizon for your capital improvement program? How often is your Master Plan updated?
3. Provide a list of all sewage spills from your sewage collection system between July 1, 1996 and June 30, 2001. Include dry and wet weather spills from sewer pipes, maintenance holes, sewage pump stations, and basement backups caused by problems in your sewer mains. For each spill, provide the following information:
1. date and time,
 2. estimated or measured volume,
 3. duration (or time spill started and time spill stopped),
 4. the location of the spill and the structure (i.e. manhole, SPS, etc.) from which the sewage spilled,
 5. destination of the spilled sewage and whether or not spill reached waters of the U.S. (spill to a storm water catch basin or storm water drain is considered a spill to waters of the U.S.),
 6. whether or not the spill resulted in a beach advisory or closure,
 7. cause of the spill, and
 8. any steps taken to control or mitigate effects of the spill.
4. Provide a list of the satellite collection systems tributary to your collection system. (A satellite system is a wastewater collection system which is not owned and operated by your organization but which discharges wastewater to your

collection system or treatment facilities. You may exclude privately owned collection systems such as office parks and shopping malls.) The list should include, for each satellite system, the name of the entity that owns, operates, and maintains the satellite system; the name, address, and phone number of the person responsible for operating and maintaining the satellite system; and the average daily wastewater flow contributed by the satellite system. Indicate whether your organization assumes any responsibility for operating or maintaining the satellite collection systems. Provide a copy of a typical contract agreement with your satellite collection systems for conveyance, treatment, and disposal of wastewater.