SANITARY SEWER OVERFLOW VIOLATIONS – MODEL CORRECTIVE ACTIONS

The following are sample paragraphs for optional wastewater corrective actions that can be included in the Wastewater Model Consent Order.

COLLECTION SYSTEM

1. Inflow and Infiltration Improvements
2. Lift Station Improvements
3. Develop CMOM
4. Fully Implement CMOM
5. Document CMOM progress
6. Private collection system inventory
7. Emergency Response Plan

ASSET MANAGEMENT

POLLUTANT REDUCTION PLAN

FINAL REPORT

**COLLECTION SYSTEM**

a) Within # days of the effective date of this Consent Order, Respondent shall submit to the Department a plan and schedule (hereinafter, I&I Plan) to reduce infiltration and inflow (I&I) into the collection system. Referring to the EPA Quick Guide for Estimating Infiltration and Inflow dated June 2014 which is attached to this Order and also available at the following link: <https://www3.epa.gov/region1/sso/pdfs/QuickGuide4EstimatingInfiltrationInflow.pdf>, (copy provided as Attachment 1), the I&I Plan shall reduce Average Dry Weather (ADW) flow to less than 120 gallons per person per day (gppd), reduce gallons per day per inch of diameter per mile of pipe (gpd/idm) to less than 1,500 gpd/idm, and reduce the Average Wet Weather Flow (WWF) to less than 275 gallons per person per day (gppd). The actions in the I&I Plan shall have a completion date no later than [DATE].

b) Within # days of the effective date of this Consent Order, Respondent shall submit a plan and schedule (hereinafter, Lift Station Plan) to the Department for comment and approval of the schedule to bring all of the Facility’s lift stations into compliance with the standards specified in the “Recommended Standards for Wastewater Facilities,” the current version of which is referenced in Rule 62-604.300(5)(g), Florida Administrative Code. The plan shall specifically describe how emergency pumping capability is provided for all pump stations, including during long duration wide-spread power outages.

 If the Facility has not returned to compliance after completing the actions in the Lift Station Plan, Respondent shall, submit to the Department a permit application with a schedule to expand or upgrade the system to bring Respondent into compliance with Permit [Facility No.] and Fla. Admin. Code Chapters 62-600, 62-604, 62-610, 62-620, and 62-640.

1. Within # days of the effective date of this Consent Order, Respondent shall develop a documented Capacity, Management, Operation, and Maintenance (CMOM) program in accordance with US EPA document 305-B-05- 002 dated January 2005 (“Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems”).
2. Within # days of the effective date of this Consent Order, Respondent shall fully implement for the entire system, a documented Capacity, Management, Operation, and Maintenance (CMOM) program in accordance with US EPA document 305-B-05- 002 dated January 2005 (“Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems”).

e) The Respondent shall document reasonable further progress in implementing the CMOM in accordance with subparagraph (d) of this order in [quarterly/semiannual] reports. Each report shall be due on the last day of the first month following the end of each calendar [quarter/6 month] period. The first [quarterly/semiannual] report shall be submitted to the Department by [DATE]. Subsequent reports shall be submitted until the CMOM program is fully implemented in the entire system.

f) Within # days of the effective date of this Consent Order, Respondent shall submit a list of all known pump stations and collection systems connected to the [Utility] that are not under the direct control of the [Utility], including any private collection systems. Include responsible party contact information, estimated flow from the pump stations and the locations of the pump stations.

g)Within # days of the effective date of this Consent Order, Respondent shall provide an updated comprehensive wastewater Emergency Response Plan as part of the collection system Operations & Maintenance Manual that is consistent with Rule 62-604.500, F.A.C. and details the City’s (1) SSO response plans including surface water quality sampling protocols, and (2) hurricane and severe storm preparedness and response.

(As necessary, add the following paragraphs for SSO plans (i – ix) or hurricane/severe weather plans (x – xii))

[The Emergency Response Plan shall include:]

* + - 1. The steps staff shall follow upon discovery of an unauthorized discharge, with the goal of immediately limiting the threat to public health and the environment by stopping the discharge, limiting the extent of impacts, and controlling public access to impacted areas;
			2. Where and how staff may rapidly access information regarding the locations of pipes, valves, pumps, and other components of the system for purposes of responding to an unauthorized discharge;
			3. Who has authority to direct a response, including acquiring equipment or materials, mobilizing and directing staff and contractors, and initiating required notifications;
			4. How internal communications will be conducted, beginning with notification of the person authorized to direct the response when an unauthorized discharge is discovered;
			5. How and when sampling of surface waters will be conducted, who will collect samples and how the samples will be handled and transported to a certified laboratory, and what parameters will be analyzed, with analyses to include *Escherichia coli* for Class III fresh waters and Class I potable water supplies, *Enterococci* for Class III marine waters, and fecal coliform and *Enterococci* for Class II shellfish harvesting waters, [Total Nitrogen and Total Phosphorus if receiving waterbody is nutrient impaired]. Sampling locations should be selected to reflect (1) background/upstream conditions not receiving effluent or sewage, (2) the impacted area as close as possible to where the wastewater entered the water body, and (3) the impacted area downstream of or outward from the point in which the effluent or sewage entered the waterbody, with multiple sample points as needed to demonstrate the extent of the impacts.
			6. Where and how equipment or materials may be obtained, how staff may be dispatched, and how contractors may be mobilized to respond to the discharge and to repair the damage or correct the problem that resulted in the discharge;
			7. How and when the required notifications will be made and updates provided to the Department, other regulatory agencies, and the public, including signs and other measures prepared in advance for public access control;
			8. How discharge volumes will be estimated, basing calculations on such factors as pipe size, pressure, size of opening, and any other applicable information;
			9. How the event will be documented and tracked, and how the information will be incorporated into Respondent’s management of the sanitary sewer system;

(x) Numbers and type of portable or fixed generators, bypass pumps, vacuum trucks, transport vehicles, personnel, and quantities of fuel to be kept in readiness for emergencies, and how items will be mobilized and deployed to keep pump stations and wastewater treatment and disposal operating during a significant power outage event,

* + - 1. What outside resources, such as contractors, Mutual Aid Agreements or FlaWARN, may be called upon when needed, how the request for assistance is handled, what documentation is necessary as work proceeds, and how the outside assistance will be supervised, accounted for, and coordinated with Respondent’s own equipment and personnel,
			2. A public education campaign with 3 components:
				1. outreach to customers via social media and other means prior to hurricane season, addressing sanitary sewer overflow prevention through maintenance of service connections and grease traps, not opening cleanouts or manholes, and preventing blockages,
				2. outreach as a predicted event approaches (e.g., hurricane), addressing what customers should do or should avoid to prevent or be prepared for sanitary sewer overflows, and how customers can get information regarding their system before the storm,
				3. outreach after the event, addressing how to deal with backups and floodwaters, proper cleanup, health precautions, and how to get information about the sewer system’s status or report problems.

**ASSET MANAGEMENT PLAN**

Within # days of the effective date of this Consent Order, Respondent shall develop an Asset Management Plan in accordance with US EPA document *Asset Management: a Best Practices Guide*, EPA 816-F-08-014, <https://nepis.epa.gov/Exe/ZyPDF.cgi/P1000LP0.PDF?Dockey=P1000LP0.PDF>

**POLLUTANT REDUCTION PLAN**

Within # days of the effective date of this Consent Order, Respondent shall develop and implement a Pollutant Reduction Plan to address elevated [*Escherichia coli (E. coli) / Enterococcus*] bacteria levels in [waterbody]. The Plan shall include measures to identify and eliminate sources of [*E. coli / Enterococcus*] bacteria within the [municipality] and shall be submitted to the Department for review and approval.

As part of the Pollutant Reduction Plan, the Respondent shall conduct and submit to the Department quarterly sampling data for at least 1 year/4 consecutive quarters to the Department for the areas referenced above (minimum 2 stations per area). The Plan shall continue to be implemented, and sampling shall continue quarterly until bacteria levels fall within surface water quality criteria for at least two consecutive quarters.

**FINAL REPORT**

Within 30 days of completion of all corrective actions required in this Consent Order, Respondent shall submit to the Department a Final Report demonstrating that all conditions and corrective actions required in this Consent Order have been completed.