CK#00035, $ 7050.00

VII. DISTRIBUTION AND MAINTENANCE OF SSORP

Annual updates to the SSORP reflect all changes in policies and procedures as may be required to achieve its objectives.

A. Submittal and Availability of SSORP

Copies of the SSORP and any amendments are distributed to all personnel who may become incidentally involved in responding to overflows should also be familiarized with the SSORP.

B. Review and Update of SSORP

Review of the SSORP is conducted annually and amended as appropriate.

Marion should:

- Update the SSORP with the issuance of a revised or new NPDES permit or state waste discharge permit;
- Conduct annual training sessions with appropriate personnel; and
- Review and update, as needed, the various contact person lists included in the SSORP.
- Along with the submittal of the annual Consent Administrative Order Report, this SSORP document will be updated and submitted as part of the entire report.

C. Practical Resources

There will be laminated guides printed and furnished to all employees that are involved with the SSO Response Plan, which will provide an overview of the of procedures as well as essential phone numbers.

D. Training

The training should include any employee who is involved in or may possibly be involved in the SSO process. These persons are provided a copy of the SSO Response Plan and said plan will be reviewed in depth with them. This training should take place annually or when revisions occur so that all personnel are brought up to date of any changes that may occur. Each division should also review their response efforts at these annual training sessions and should take suggestions to revise procedures. These suggestions will then be submitted to all divisions for review to determine if the revisions are required.

APPENDIX A. Procedure to Track Sanitary Sewer Overflows

The procedure to track the frequency and location of SSOs will be as defined below:

A. All SSOs will have a work order prepared within our work order database.

B. SSOs will be defined as capacity: (**SOC** = Sewer Overflow Capacity) (**SOCP** = Sewer Overflow Capacity Private/capacity overflow occurring on privately-owned assets) or non-capacity: (**SONC** = Sewer Overflow Non-Capacity). The definition of a non-capacity will be one that overflows due to an obstruction in the main line, line failure, or equipment failures. The definition of a capacity related overflow is one that has insufficient carrying capacity to handle inflow and/ or infiltration during a storm event. Engineering shall maintain and update a list of capacity related SSOs. Several other codes have been defined as follows: (**SONCO**) Sewer Overflow Non-Capacity due to vandalism or contractor damage, (**SONCP**) = Sewer Overflow Non-Capacity Private / overflow occurring on a privately owned assets)

C. The work order will also include the asset number to identify the overflow locations, which will always be the upstream manhole number of the sewer main asset. A service number will also be assigned by Dispatch for tracking all associated activities.

D. Monthly reports will be prepared providing the number of capacity and non-capacity SSOs.

E. In addition to work order data, information on all reported SSOs will be maintained in an "event" database. The SSO event database (DMR) has been designed to contain all information required for regulatory reporting. Reports generated from the database will have the capability of pulling SSO locations based upon dates, assets and occurrences within a set time frame.

F. An initial list of reported capacity related SSOs has been developed for inclusion in the Permanent Signage phase of this SSORP. This list shall be maintained and annually updated as conditions and overflow mitigation efforts work to improve capacity related deficiencies in the collection system. The following list, Table A-1, contains those SSO sites that are to be equipped with permanent signage.

Table A-1

SSOs Eligible for Permanent Signage

None at this time.

H. An annual report will be prepared by the Director, which shall include a review of all capacity related overflows, as well as determine updates to the table above for permanent signage and potential capacity related SSO manholes. These updated capacity related SSO lists shall be included for amendment to this SSORP.

APPENDIX B. SSO Action Plan

Dispatching Crews

Staff receive notification of possible SSOs from two sources □ public and internal crews.

Notification during working hours

Staff receive notification of a possible SSO from the public at which time they collect all relevant information as outlined in Section III-A, which at this point they dispatch one of our area Response Crews to the site to verify if an SSO has occurred. The crew will report findings back to Director.

The Responding Crew determines if an SSO has occurred. The Responding Crew goes to site and takes photographs before clean-up is started and places warning signage at the site as well as at adjacent homes if required and available. The Director also verifies that the Responding Crew has filled out an Overflow Report Form and that the required information is on form.

Crews at this point start cleanup and sanitize the site. When complete, the crew is to verify that the cleanup is completed, take after photographs, and remove warning signs.

Notification after hours

The Response Crews receive notification of a possible SSO from the public at which time they collect all relevant information as outlined in Section III-A. and then proceed to the location. (On call staff manages emergency phone after hours.)

The Response Crew determines if an SSO has occurred, attempts to resolve the problem, takes photographs before cleanup and places warning signs at the site as well as at adjacent homes if required. The crew is to fill out an Overflow Report Form which is submitted with their paper work at the beginning of the next workday.

The Response Crew then starts clean-up and sanitizes the site, which, when completed, the crew is to take after photographs and remove warning signs.

If the SSO occurred within a structure the Director is to verify that cleanup has been completed and all policies were followed. A site visit is to be performed no later than the first

work day after the overflow occurrence. The Mayor will be informed as well to handle any damage claims.

Internal Notification

Personnel in the field who find an SSO are to contact the Director and provide the relevant information as outlined in Section III-A. The same procedure as shown for public notification under working hours will be used.

Rain events that are one-inch or greater will trigger our crews to investigate possible recurring SSO sites to verify if an overflow has occurred. These crews will be furnished with a list of possible SSO sites which has been determined as being locations that have the potential to overflow. The crew will follow the same procedure as outlined under public notification during working hours. When a crew has gone through their list and an SSO was found, they will return to the site to conduct proper cleanup.

Crews will walk lines and open manholes to check for any blockage or surcharged lines before an SSO exists. The crew will address all stoppages immediately to restore service and will fill out hand written work orders for additional follow-up investigation that will be turned in the following workday. A cleaning work order and a TV inspection are required on ALL main line sections where stoppages are found and where the work has not been performed during the initial investigation. If the crews find an SSO, they follow the same procedure as shown in the "public notification during working hours" section of this document.

Main line blockages will be cleaned within three (3) working days and a follow-up TV inspection is to be completed within an additional two (2) working days. After TV work has been completed, the Collection System Maintenance Supervisor will review the TV video to determine any subsequent appropriate action to prevent re-occurrence.

APPENDIX C. Detecting Potential Explosive or Toxic Conditions

Purpose

To ensure that all affected utility employees are notified of potential health or safety hazards in the sewer collection system

Procedure

The following procedures must be followed when detecting potential health or safety hazards in the sewer collection system:

Step 1

The utility employee(s) or crew discovering the potential health or safety hazard must notify Director to report the potential problem.

A. Information included in the report:

1. Name of the employee making the report
2. Street address or location of potential hazard
3. Manhole number (if known)
4. Brief description of findings

Step 2

The Director will then investigate the report.

Step 3

If the Director confirms the report, the Director will ALERT all affected field crews via cellphone that the reported area is "Off Limits" until further notified. The Director will notify ALL other affected department supervisors of the reported area.

Step 4

The director will notify the Mayor of the Potential Hazardous Area.

Step 5

If the investigation suspects a Natural Gas Leak, the Director will contact Summit to report the situation.

Step 6

The Director will keep ALL affected city departments informed of the situation and monitor their (Summit) findings.

Step 7

Once the health or safety hazard has been corrected, the Safety & Risk Department will perform a follow- up investigation and when NO HAZARDOUS conditions exist, the Director will remove the Safety ALERT and notify all affected departments.

Step 8

Industrial investigations resulting from explosive or toxic conditions will be performed by Director.

After Hours Reporting

If a hazardous atmosphere is detected after normal working hours, the employee must report the area the next working day prior to his/her normal working hours. After this report is made the process will begin with "Step 1".

APPENDIX D. SSO Flow and Volume Determination

As indicated previously in this SSORP, each SSO that is actively discharging during the investigation phase of this response plan's tasks shall be evaluated for flow and ultimate total volume discharged, each of which is to be included as part of the reporting requirements. The Engineering Department has defined a three tiered flow estimating system that is derived from the reaction of the manhole lid in relation to the flow exiting the collection system. This system is easily field estimated without the need for measuring devices, which in most instances, would fail to achieve a proper signal due to the lack of sufficient depth of flow.

It has been determined that the majority of actively discharging SSOs reported by a response crew would be non-capacity related. Therefore criteria for determining flow should concentrate on these conditions for gravity sewer collection systems. The three-category rating system is outlined below:

- **0 – 10 gpm** (gallons per minute)

  This rate covers the light discharge experienced in the upper reaches of the collection system, usually with a small number of residential connections. The visual indicator would be a light flow (about the rate of a standard faucet) from around the manhole lid with no visible release of debris or solids and no movement or lifting of the lid itself.

- **10 – 100 gpm**

  This rate covers the moderate discharge experienced in the lower reaches of the collection system, usually along the larger collector or outfall type sewer mains (typically 10" and larger mains) and in some capacity related SSOs. The visual indicator would be a noticeable flow from around the manhole lid, slight debris or solids release, and a rocking or slight lifting of the manhole lid.

- **100 gpm** (greater than 100 gpm)

  This rate covers the heavy discharge experienced along the major outfall sewers and larger capacity related SSOs. The visual indicator is the definite release of debris or solids, and the complete lifting or displacement of the manhole lid.

SSO volumes are derived from the above category multiplied by the duration of discharge. If the exact length of discharge is unknown, criteria for determining an estimated time have been established in the Section III-D, Overflow Report.

APPENDIX E. Signage for Overflows

Temporary Signage

The following language shall be used on signs located on existing SSO sites during cleanup and on notices attached to homes adjacent to SSO sites:

NOTICE OF SANITARY SEWER

OVERFLOW

Please avoid contact with this

sanitary sewer facility due to

the possibility of adverse health effects until cleanup can be completed

For Additional Information
Contact 870-739-3073

Permanent Signage

The following language shall be used on signs located on potential SSO sites that occur more than once in a twelve-month period:

NOTICE OF
SANITARY SEWER OVERFLOWS
WHICH MAY OCCUR
AT THIS LOCATION

Please avoid contact with this

sanitary sewer facility during an

overflow condition due to the

possibility of adverse health effects

until cleanup can be completed

For Additional Information
Contact 870-739-3073