



# Sewer System Management Plan

November 2024 Update



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## ***Preface***

This Sewer System Management Plan (SSMP) has been prepared pursuant to the requirements of State Water Resources Control Board (State Water Board) Order No. WQO-2022-0103-DWQ, *Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems* (General Order). The content of this SSMP reflects the specific requirements of the General Order, and was informed by the *SSMP Development Guide*, developed jointly by the San Francisco Bay Regional Water Quality Control Board and the Bay Area Clean Water Agencies (BACWA) in 2005, and by the subsequent *Guide for Developing and Updating of Sewer System Management Plans* prepared by BACWA in 2024.

Each section of this SSMP corresponds to a required element as described in Appendix D of the General Order. The requirements for each element are also provided as a preface for each section of this SSMP. In some cases, a section may also include additional information (in subsections) that is not part of that element's required content.

## 1.0 Goal and Introduction

*The goal of the Sewer System Management Plan (Plan) is to provide a plan and schedule to: (1) properly manage, operate, and maintain all parts of the Enrollee's sanitary sewer system(s), (2) reduce and prevent spills, and (3) contain and mitigate spills that do occur. The Plan must include a narrative Introduction section that discusses the following items:*

### **1.1. Regulatory Context**

*The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates.*

### **1.2. Sewer System Management Plan Update Schedule**

*The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of sewer spills.*

### **1.3. Sewer System Asset Overview**

*The Plan Introduction section must provide a description of the Enrollee-owned assets and service area, including but not limited to:*

- *Location, including county(ies);*
- *Service area boundary;*
- *Population and community served;*
- *System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons;*
- *Structures diverting stormwater to the sewer system;*
- *Data management systems;*
- *Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals;*
- *Estimated number or percent of residential, commercial, and industrial service connections; and*
- *Unique service boundary conditions and challenge(s).*

*Additionally, the Plan Introduction section must provide reference to the Enrollee's up-to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment.*

## 1.1. Regulatory Context

This Sewer System Management Plan (SSMP) has been prepared by the Public Works Department of the City of Millbrae with support from Causey Consulting. Support for the 2024 update was provided by EOA Inc. The SSMP is a compendium of the policies, procedures, and activities that are included in the planning, management, operation, and maintenance of the City's sanitary sewer system.

In 2006, the State Water Resources Control Board (State Water Board) issued statewide waste discharge requirements for sanitary sewer systems, which include requirements for development of an SSMP. The State Water Board's requirements were updated and reissued as WQO 2022-



0103-DWQ, adopted on December 6, 2022. This SSMP is intended to update the City's existing SSMP, in continued compliance with the General Order.

## 1.2. Sewer System Management Plan Update Schedule

The State Water Board's SSMP Update web site lists the following due dates:

- SSMP Update: August 2, 2025
- SSMP Audit: February 2, 2025 (six months after end of required 3-year audit period, listed as August 2, 2024).

## 1.3 Sewer System Asset Overview

The City of Millbrae's sanitary sewer collection system serves a population of approximately 23,216 as reported in the 2020 census. It is in the northern portion of the San Mateo County. The service area covers 3.26 square miles with approximately 6319 sewer connections. The collection system consists of 59.3 miles of gravity sewers, 1600 manholes and 22 miles of publicly owned lower laterals. The remaining lower and upper laterals are privately owned. The gravity sewer lines range in size from six (6) to thirty-six (36) inches in diameter. The City also operates three (3) pump stations and associated force mains. All wastewater is conveyed to and treated at the City's Publicly Owned Treatment Plant (POTW).

**Figure 1.1** contains a map of the City's sanitary sewer system.

**Table 1.1:** Gravity Sewer System Size Distribution and **Table 1.2** provide the composition of the sewer piping by size and material of construction.

**Table 1.3** provides the installation age distribution of the City's collection system as reported in the California Integrated Water Quality System (CIWQS).

### ***CIWQS Identification***

The following designations are used in CWIQS to identify the city and its collection system:

Agency: Millbrae City

WDID: 2 SSO10155

Collection System: Millbrae City CS

## 1.4 Definitions and Abbreviations

The following are acronyms and abbreviations used in this SSMP and associated documents:

***Asset Inventory Management Systems (AIMS) – see CMMS***

### ***Best Management Practices (BMP)***

Refers to the procedures employed in commercial kitchens to minimize the quantity of grease that is discharged to the sanitary sewer system. Examples include scraping food scraps into a garbage can and dry wiping dishes and utensils prior to washing.

***Building Lateral – see Private Sewer Lateral***

***Calendar Year (CY)***

***California Integrated Water Quality System (CIWQS)***

Refers to the State Water Resources Control Board online electronic reporting system that is used to report and certify sewer spills, certify completion of the SSMP, and provide information on the sanitary sewer system.

***Capital Improvement Plan (CIP)***

Referring to the document that identifies future capital improvements to the City's sanitary sewer system.

***Cast Iron Pipe (CIP)***

***City***

Refers to the City of Millbrae.

***Closed Circuit Television (CCTV)***

Refers to the process and equipment that is used to internally inspect the condition of gravity sewers. CCTV videos are typically recorded on electronic media.

***Computerized Maintenance Management System (CMMS)***

Refers to a database application used to manage and document maintenance activities of a collection system. The city currently uses the Asset Inventory Management System (AIMS) system.

***Corrugated Pipe (CP)***

***Ductile Iron Pipe (DIP)***

***Enrollee:***

A public, private or other non-governmental agency that has obtained coverage under the General Order. In the context of this SSMP, the enrollee is the City of Millbrae. The term is used extensively in the General Order.

***Fats, Oils, and Grease (FOG)***

Refers to fats, oils, and grease typically associated with food preparation and cooking activities that can cause blockages in the sanitary sewer system.

***Fats, Roots, Oils and Grease (FROG)***

***Feet per sec (fps)***

***First Responder***

Refers to the field crew or the On Call personnel that are the City's initial response to a spill event or other sewer system event.

***Fiscal Year (FY)***

***Food Service Establishment (FSE)***

Refers to commercial or industrial facilities where food is handled/prepared/served that discharge to the sanitary sewer system.

***General Order***

Refers to State Water Board Order 2022-0013-DWQ, *Statewide Waste Discharge Requirements – General Order for Sanitary Sewer Systems*. The term General Order is also used throughout Order 2022-0013-DWQ in referring to itself.

***Geographical Information System (GIS)***

Refers to the system that it uses to capture, store, analyze, and manage geospatial data associated with the City's sanitary sewer system assets.

***Global Positioning System (GPS) Device***

Refers to the handheld unit that can be used to determine the longitude and latitude of sanitary sewer overflows for use in meeting CIWQS reporting requirements. It can also be used to geolocate assets for the GIS.

***Grease Removal Devices (GRDs)***

Refers to grease traps and grease interceptors that are installed to remove FOG from the wastewater flow at food service establishments.

***High Density Polyethylene (HDPE)******Infiltration/Inflow (I/I)***

Refers to water that enters the sanitary sewer system from storm water and/or groundwater.

- Infiltration enters through defects in the sanitary sewer system after flowing through the soil.
- Inflow enters the sanitary sewer without flowing through the soil. Typical points of inflow are holes in manhole lids and direct connections to the sanitary sewer (e.g. storm drains, area drains, and roof leaders).

***Lateral***

Refers to the piping that conveys sewage from a building to the City's sewer main. The distinction is sometimes made between the upper lateral (from building to property line) and the lower lateral (from property line to the sewer main).

***Legally Responsible Official (LRO)***

Refers to the individual(s) designated by the City with authority to ensure the enrolled sanitary sewer system(s) complies with this Order, and who is authorized to serve as the City's duly authorized representative. The LRO must be formally designated and registered with the State Water Board, with an assigned username and password. Both data submitters and LROs can submit spill reports in CIWQS, but only LROs can certify reports. Refer to Section 5.1 of the General Order for a full description of required LRO qualifications and responsibilities.

***Manhole (M/H)***

Refers to an engineered structure that is intended to provide access to a sanitary sewer for maintenance and inspection.

***Million Gallons per Day (MGD)***

***Mainline Sewer***

Referring to City wastewater collection system piping that is not a private lateral connection to a user. Also referred to as a sewer main.

***Monitoring and Reporting Program (MRP)***

Refers to the Monitoring and Reporting Program section of the General Order.

***Notice of Correction (NOC)******Nuisance***

California Water Code section 13050, subdivision (m), defines nuisance as anything that meets all of the following requirements:

- It 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.
- Affects at the same time an entire community or neighborhood, or any considerable number of people, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
- Occurs during, or as a result of, the treatment or disposal of wastes.

***Office of Emergency Services (OES)***

Refers to the California State Office of Emergency Services.

***Operations and Maintenance (O&M)******Pipeline Assessment and Certification Program (PACP)***

Refers to the NASSCO certification program that is used for the evaluation and condition assessment of sewer lines and appurtenances from closed circuit televising of the lines and appurtenances.

***Publicly Owned Treatment Works (POTW) – see WPCP below******Preventative Maintenance (PM)***

Refers to maintenance activities intended to prevent failures of the sanitary sewer system facilities (e.g. cleaning, CCTV, repair).

***Private Sewer Lateral (PSL)***

That portion of a private property's building sewer is defined by the plumbing code, and is further defined as the piping of a drainage system that extends from the end of the building drain to the public sewer which includes the connection to the public sewer unless there is a cleanout in the sidewalk or within two and half feet of the property line. In this case the property owner is responsible for the lateral from the building drain to the cleanout only. The General Order also uses the term "Privately-Owned Sewer Lateral" in referring to a PSL.

***Private Lateral Sewage Discharges (PLSD)***

Sewage discharges that are caused by blockages or other problems within a privately owned lateral.

***Property Damage Overflow***

Refers to a sewer overflow or backup that damages a property owner's premises.

## ***Public Works (PW)***

### ***Pump Station***

A facility that pumps sewage into a sanitary sewer force main or gravity main. Pump stations that discharge to gravity mains are also referred to as Lift Stations.

### ***Regional Water Quality Control Board (RWQCB or Regional Water Board)***

Refers to the San Francisco Bay Regional Water Quality Control Board, a part of the State Water Resources Control Board.

### ***Sanitary Sewer Backup (Backup)***

A wastewater backup into a building and/or on private property caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.

### ***Sanitary Sewer System or Sewer System***

Refers to the sanitary sewer facilities that are owned and operated by the City of Millbrae and include main line sewers, manholes, pump stations, force mains and certain lower laterals and any other appurtenances in the publicly owned sewer system

### ***Sensitive Areas***

Refers to areas where an SSO could result in a fish kill or pose an imminent or substantial danger to human health.

### ***Sewer Service Lateral***

Refers to the piping that conveys sewage from the building to the City's wastewater collection system or to the property line cleanout.

### ***Sewer System Management Plan (SSMP)***

### ***Spill***

A discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system overflow, operational failure, and/or infrastructure failure. Exfiltration of sewage is not considered to be a Spill under this General Order if the exfiltrated sewage remains in the subsurface and does not reach a surface water of the State. For reporting purposes, spills are grouped into one of the following four categories (definitions from General Order):

#### **Category 1:**

A Category 1 spill is a spill of any volume of sewage from or caused by a sanitary sewer system regulated under the General Order that results in a discharge to:

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

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

A spill from a City-owned and/or operated lateral that discharges to a surface water is a Category 1 spill;

Category 2:

A Category 2 spill is a spill of 1,000 gallons or greater, from or caused by a sanitary sewer system regulated under this General Order that does not discharge to a surface water.

A spill of 1,000 gallons or greater that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system, is a Category 2 spill.

Category 3:

A Category 3 spill is a spill of equal to or greater than 50 gallons and less than 1,000 gallons, from or caused by a sanitary sewer system regulated under this General Order that does not discharge to a surface water.

A spill of equal to or greater than 50 gallons and less than 1,000 gallons, that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 3 spill.

Category 4:

A Category 4 spill is a spill of less than 50 gallons, from or caused by a sanitary sewer system regulated under this General Order that does not discharge to a surface water.

A spill of less than 50 gallons that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 4 spill.

*Spills that include multiple appearance points resulting from a single cause are considered a single spill for documentation and reporting purposes in CIWQS.*

*Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned are not considered failures of the City's sewer system and do not require reporting by the City.*

*Note: The previous General Order used the term "Sanitary Sewer Overflow" (SSO) to describe releases from the sewer system. The term is not used in the current General Order but appears in historic documents and on the State Water Board's web site.*

***Spill Emergency Response Plan (SERP)***

A Plan that describes actions taken by the City in response to a spill, notification and reporting requirements, and other related items. The SERP is required as Element 6 of this SSMP.

***Spill Report***

Refers to sewer spill report submitted through the State Water Board's CIWQS database.

***Standard Operating Procedures (SOP)***

Refers to written procedures that pertain to specific activities employed in the operation and maintenance of the Sanitary Sewer System.

***Standard Specifications***

Refers to the latest edition of Standard Specifications published by the City of Millbrae

***State Water Board***

Refers to the California Environmental Protection Agency (Cal EPA) State Water Resources Control Board (SWRCB). The SWRCB is the parent agency of the Regional Water Board and

is the agency that issued the General Order. The General Order uses the term “State Water Board” when referring to the SWRCB. That same convention is used in this SSMP.

***Supervisory Control and Data Acquisition (SCADA)***

Refers to the electronic system used by the City to monitor the performance of its pump stations and to notify the operating staff when there is a condition that requires attention

***Untreated or Partially Treated Wastewater***

Any volume of waste discharged from the sanitary sewer system upstream of a wastewater treatment plant headworks.

***Utility and Operations Division (U&O)***

***Vitrified Clay Pipe (VCP)***

***Waste Discharge Identification Number (WDID)***

State of California Waste Discharge Identification Number for reporting spills and other required information required by the General Order.

***Waste Discharge Requirements (WDR)***

Refers to an order regulating the discharge of wastes issued under the authority of the California Water Code. WDRs are issued by both the State Water Board and Regional Water Boards and may apply to individual dischargers or groups of dischargers, in which case the WDR is typically referred to as General or Statewide Orders. General Order No. 2022-0103-DWQ is a WDR.

Attachment A of the General Order has additional definitions for terms used in that Order.

***Water Body***

Any stream, creek, river, pond, impoundment, lagoon, wetland, or bay.

***Water of the State***

Refers to “any surface water or groundwater, including saline waters, within the boundaries of the state.” (California Water Code § 13050(e)).

***Water of the United States or Surface Waters***

Refers to the Environmental Protection Agency definition included in the Clean Water Act Part 230.3 Definitions.

***Water Pollution Control Plan (WPCP)***

The City-owned sewage treatment facility operated by the Public Works Department, located at 400 East Millbrae Avenue.





**Table 1.1: Gravity Sewer System Size Distribution**

<b>Diameter inches</b>	<b>Number of Line Segments</b>	<b>Pipe Length, linear feet</b>	<b>Portion of Sewer System, %</b>
6	1,064	198,679	63.1
8	413	80,164	25.5
10	62	13,889	4.4
12	27	5,554	1.8
14	2	3,009	1.0
15	3	379	0.1
16	36	5,781	1.8
18	35	5,162	1.6
24	11	1,254	0.4
33	3	277	0.1
36	2	497	0.2
<b>Totals</b>	<b>1,658</b>	<b>314,645</b>	<b>100</b>
<b>Total, miles</b>	<b>N/A</b>	<b>59.6</b>	<b>100</b>

**Table 1.2: Sewer System Materials of Construction**

<b>Material</b>	<b>Number of Line Segments</b>	<b>Pipe Length, LF</b>	<b>Percent of Sewer System</b>
VCP	1,107	216,712	68.8
HDPE	492	85,339	27.1
RCP	5	3,079	1.0
DIP	7	1,990	0.6
CIP	1	102	0.0
PVC	32	5,617	1.8
PL	8	1,032	0.3
Transite	6	735	0.2
Liner	1	204	0.1
Other	1	146	0.05
<b>Total</b>	<b>1,659</b>	<b>414,956</b>	<b>100</b>

**Table 1.3: Inventory of Sewer Lines by Pipe Age**

<b>Age, Years</b>	<b>Construction Period</b>	<b>Approx Miles of Main</b>	<b>Percent of System</b>
0-5	2020-Present	6	10
21 - 40	2000 - 2019	12	20
41 – 60	1980– 1999	3	5
61 – 80	1960 – 1979	18	30
66 – 85	1940 – 1959	21	35
86 - 105	1920 – 1939	0	0
106 - 125	1900 – 1919	0	0
<b>Approx Total Miles 60</b>			100

\* Source: CIWQS 2024 Annual Report

## 2.0 Organization

*The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organization chart or similar narrative documentation that includes:*

- The name of the Legally Responsible Official as required in section 5.1 (Designation of a Legally Responsible Official) of this General Order;*
- The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan elements;*
- Organizational lines of authority; and*
- Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. (For example, county health officer, county environmental health agency, and State Office of Emergency Services.)*

### 2.1 Name of Legally Responsible Official

The City's current LRO is listed below. The LRO meets the requirements described in Section 5.1 of the General Order. Contact information is provided in Section 2.3 of this SSMP.

Name	Position
Craig Centis	Public Works Deputy Director, Utilities and Operations

### 2.2 Organization Chart

The City's organization chart is presented in Figure 2.1. Roles and responsibilities of key personnel relative to the wastewater collection system are as follows:

Public Works Director: Plans, organizes, directs and supervises the public works activities of the City. Oversees all City public works activities including engineering, public improvement inspections, streets, storm drains, sanitary collection and treatment, water distribution and traffic engineering. Advises City officials on public works and related engineering matters. Assists in the formation of the City's Capital Improvement Program. Administers construction contracts and consultant requests for proposals and agreements.

Public Works Deputy Director, Utilities and Operations: Designated Legally Responsible Official (LRO) - Oversees the overall sanitary sewer program, communicates with the City Manager, provides reports to the City Council, establishes policy, plans strategy, reviews and certifies SSMP, allocates resources, delegates responsibility, authorizes outside contractors to perform services, designates Data Submitters (DS) for spill reporting. Reports to Public Works Director.

Public Works Collections Division Supervisor: - Manages collection system field operations and maintenance activities, provides relevant information to agency management, prepares and implements contingency plans, trains field crews, leads emergency response, investigates and

reports spills in CIWQS (Data Submitter). Reports to the Public Works Deputy Director for Utilities and Operations.

Lead Maintenance Worker: Responsible for maintenance and operations of the City's collection system. Implements preventive maintenance on the collection system and provides 24-hour emergency response. Reports to Public Works Streets, Collections, and Storms Supervisor.

Senior Maintenance Worker: Supervises and assists in the implementation of City and department rules, reports, regulations, policies and procedures; may inspect work being performed by outside contractors; inputs and retrieves data and work orders from a computer; and provides written reports. Reports to the Public Works Streets, Collections, and Storms Supervisor.

Maintenance Worker I/II – Public Works: Responds to SSOs. Performs preventive maintenance activities and mobilizes and responds to notification of stoppages and SSO's. Reports to Public Works Streets, Collections, and Storms Supervisor.

Equipment Mechanic: Supervises the vehicle garage operation under the direction of the Superintendent of Public Works. Supervises and assists in performing a variety of skilled tasks while performing major and minor mechanical repairs to automobiles, trucks, sweepers, tractors and other power-driven mechanical equipment and to do related physical work as required. Coordinates vendors associated with mechanical equipment.

City Engineer: Plans, designs, reviews, and prepares detailed engineering plans, specifications, cost estimates, contracts, and related documents for sewer and other public works projects. Coordinates with the Utilities and Operations Department on sanitary sewer system issues. Administers major public works projects. Updates engineering standard plans and specifications. Prepares reports, correspondence, budget documentation and other administrative documents. Prepares the Capital Improvement Plan and budget. Acts as resident engineer for public works projects.

Engineering Technician: Under direct and/or indirect supervision, performs sub professional engineering office and fieldwork of moderate difficulty. Responsibilities in support of the sewer collection system include drafting work for plans and base maps, locating existing utilities, assists with project and contract administration and field inspection of construction, plan checking of improvement plans, maintains division databases, prepares cost estimates, and responds to public inquires and requests for assistance either in person or over the phone.

Industrial Waste Inspector I/II: Under general supervision of the Laboratory/Source Control Supervisor, and guidance of the Senior Industrial Waste Inspector implements and enforces the Federal General Pretreatment Regulations, the City Sewer Ordinance, the Federal Storm Water Regulations and Pollution Prevention Program Requirements; performs POTW process monitoring and NPDES permit self-monitoring requirements. The position also manages the Fats, Oils and Grease program for the City.

Administrative Assistant: Provides clerical and administrative support to the collection system operations under direction of the Public Works Director. Supports the City AIMS system by producing and completing works orders into the AIMS system, by supporting the data management in the AIMS system. Receives and responds to public inquires related to public works operations. Supports public works staff as requested and required.

Contractors: The City utilizes many outside service contractors to support collection system functions such as major electrical and instrumentation operations, major mechanical equipment, pump maintenance, engineering design and support and root control operations. These services are provided through service agreements or purchase orders issued by the City.

## 2.3 Contact Information

Contact information for key City personnel involved in SSMP implementation are provided below.

**Table 2.1 City Personnel Involved in SSMP Implementation**

Position	Name	Phone Number
City Manager	Tom Williams	(650) 259-2467
Director of Public Works	Sam Bautista	(650)259-2336
Public Works Deputy Director	Craig Centis	(650) 259-2376
Public Works Collections Supervisor	Chris Junio	(650) 259-2453
City Engineer	Ahmad Haya	(650)259-2393
Senior Civil Engineer	Armando Mora	(650) 259-2545
Chief WPCP Operator	Harry Kwong	(650) 259-2393
Lab/Source Control Supervisor	Kevin Cesar	(650) 259-2392
Int. Maintenance Lead Worker	John Roias	(650) 259-2374

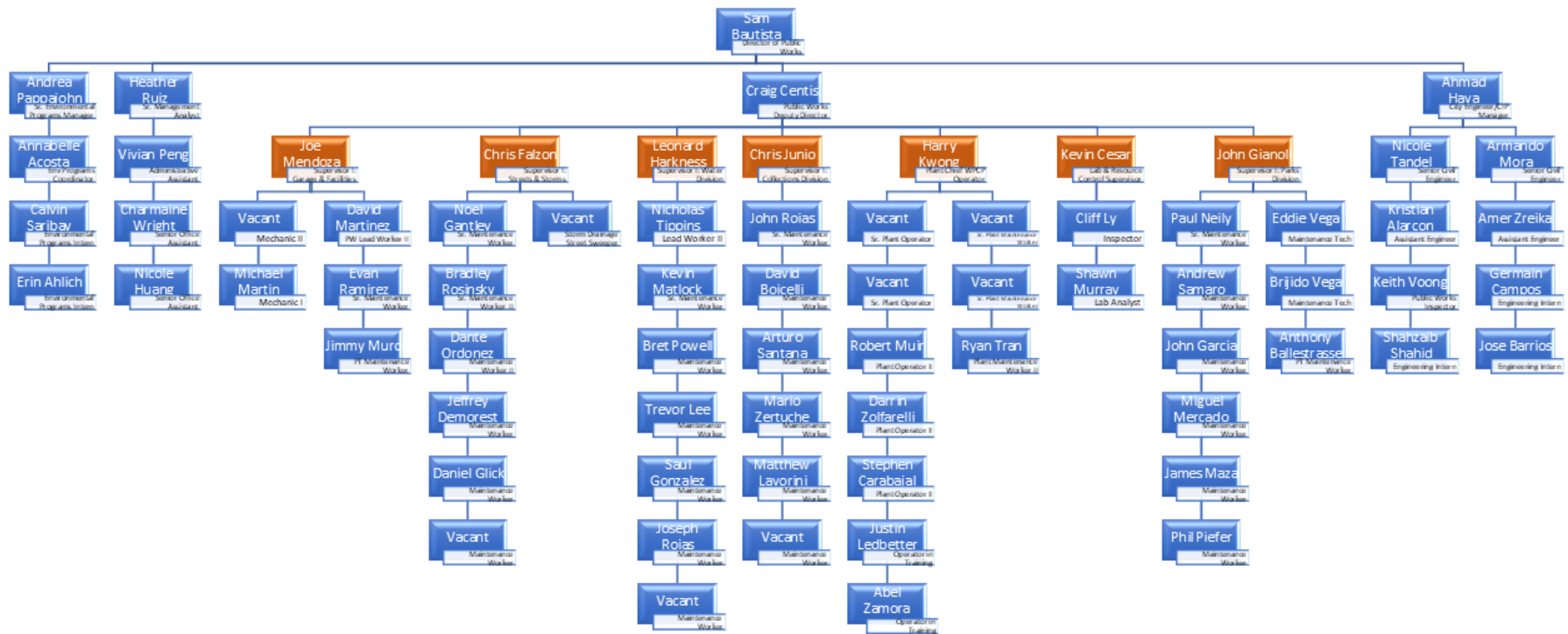
## 2.4 Spill Response Chain of Communication

The Chain of Command for Spill Response and Reporting is illustrated in Figure 2.2. (Not all lines of communication within the chain are utilized for a given spill – see below). The Fire Department is notified only if hazardous substances are involved. The Fire Department will send a report to the Public Works Utilities and Operations Supervisor who will use this report for reporting purposes to the regulatory agencies.

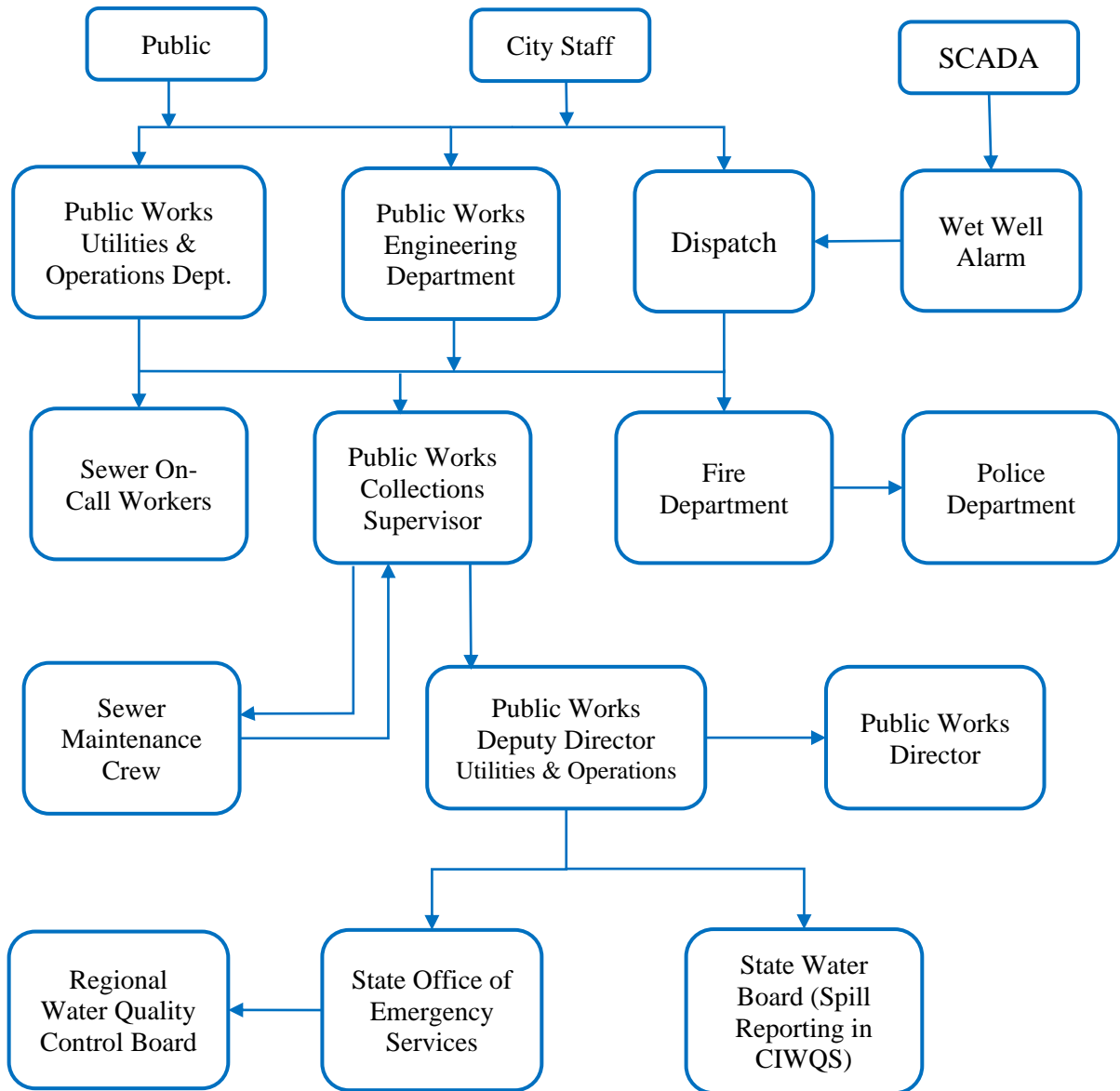
The City office is open Monday through Friday, 8:30 A.M. to 5:00 P.M. All service calls or reported spills received during business hours are directed to the Public Works Collections Supervisor and the information is recorded in CMMS with an assigned Service Call Number. Service calls received after business hours are directed to the County Dispatch Center, and the message is relayed to the designated on-call sewer worker. The sewer worker summons additional help as necessary and contacts the Collections Supervisor.

After the Sewer Maintenance Crew has contained the spill, fixed the sewer-related problem, and performed cleanup, the Sewer Maintenance Crew submits a report to the Public Works Collections Supervisor. The SSO reporting process and responsibilities are described in detail in the SERP.

**Figure 2.1: Millbrae Public Works Department Organization Chart**



**Figure 2.2: Millbrae Spill Response Chain of Communication**



### 3.0 Legal Authority

The Plan must include copies or an electronic link to the Enrollee's current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority to:

- Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that may cause blockages;
- Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure;
- Require that sewer system components and connections be properly designed and constructed;
- Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee;
- Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures; and
- Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.

Table 3-1 documents the City's legal authority to implement the requirements of the General Order. Except as noted, all citations are refer to the [City of Millbrae Municipal Code, Title 8 Public Works, Chapter 8.20 Municipal Sanitary Sewer System](#).

**Table 3.1: Documentation of Legal Authority**

Legal Authority to	Legal Authority Reference
Prevent illicit discharges	8.20.720 <i>Illicit Discharge Elimination</i>
Limit discharge of fats, oils and grease and other debris that may cause blockages.	8.20.290 <i>Prohibited Waste Discharges</i>
Require that sewers and connections be properly designed and constructed	8.20.240 <i>Design Standards, General</i> 8.20.260 <i>Construction Standards</i>
Require proper installation, testing, and inspection of new and rehabilitated sewers	8.20.270 <i>Inspection Requirements</i>
Ensure access for maintenance, inspection, or repairs for portions of the service lateral owned or maintained by the City	8.20.240 <i>Design Standards, General</i>



Legal Authority to	Legal Authority Reference
Control infiltration and inflow (I/I) from private service laterals	8.20.440 <i>Abatement of leaks, breaks and improper sanitary sewer connection</i> 8.20.450 <i>Testing &amp; Replacement of Sanitary Sewer Laterals</i> 8.20.460 <i>Inspection of Sanitary Sewer Laterals as Precondition to Obtaining Building permit</i>
Requirements to install grease removal devices (such as traps or interceptors), design standards for the grease removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements <sup>1</sup>	8.20.510 <i>Pretreatment of Industrial Wastewater</i> 8.20.670 <i>Interceptors- When Required</i> 8.20.680 <i>Maintenance of Interceptors</i> 8.20.620 <i>Retention of Records</i> Title 9, 9.10.505 <i>Adoption of California Plumbing Code, 2022 Edition</i>
Authority to inspect grease producing facilities	8.20.750 <i>Right of Entry- Inspection and Sampling</i>
Define City responsibility and policies for sewer lateral ownership, maintenance and rehabilitation or repair	8.20.160 <i>Building Drain and Sanitary Sewer Lateral</i> 8.20.430 <i>Sanitary Sewer Laterals</i>
Requirements for Sewer Lateral Inspection	Title 9, 9.10.615 <i>Amendment to Plumbing Code Section 102.4.1</i>
Enforce any violation of its sewer ordinances	8.20.760 <i>Enforcement Actions</i>

1. The Wastewater Treatment Plant's Pretreatment Programs FOG policy expands upon Municipal Code requirements related to installation and maintenance of Interceptors and Grease Removal Devices.

The Public Works Collections Supervisor and City staff are also responsible for operating the municipal separate storm sewer system (MS4) within the City, so that coordination and access to the storm drainage system agency is automatic.

## 4.0 Operations and Maintenance Program

*The Plan must include the items listed below that are appropriate and applicable to the Enrollee's system.*

### **4.1. Updated Map of Sanitary Sewer System**

*An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s). The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries.*

### **4.2. Preventive Operation and Maintenance Activities**

*A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors.*

*The scheduling system must include:*

- *Inspection and maintenance activities;*
- *Higher-frequency inspections and maintenance of known problem areas, including areas with tree root problems;*
- *Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.*

*The data collection system must document data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure.*

### **4.3. Training**

*In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors. The training must cover:*

- *The requirements of this General Order;*
- *The Enrollee's Spill Emergency Response Plan procedures and practice drills;*
- *Skilled estimation of spill volume for field operators; and*
- *Electronic CIWQS reporting procedures for staff submitting data.*

### **4.4. Equipment Inventory**

*An inventory of sewer system equipment, including the identification of critical replacement and spare parts.*

## 4.1 Collection System Maps

The wastewater collection system maps and the storm water drainage maps include the facilities and basic map information described herein. The maps are maintained in AIMS, the City's GIS system. Some areas or facilities may not have complete information but are updated by Public Works Engineering Section staff as changes to the systems occur. Maps are also updated regularly based upon reports of changes from the field, additions or changes due to capital projects or other changes as identified by City staff.

Sewer and stormwater maps are stored in the Corporation Yard, in the City Public Works Engineering office, and in emergency response vehicles.

### ***Wastewater Collection System Maps***

Sewer system maps include the following:

- Manhole – ID number, location with reference to streets and property lines.
- Pipe and Force Main – name, location, size, shape, direction of flow, length, type of material.
- Pump Station – name, location

### ***Storm Drainage System Maps***

The storm drainage system maps are separate from the collection system maps and include the following:

- Manhole – ID number, location
- Storm water facilities – direction of flow, location, size
- Pump Station – name, location

### ***System Boundary Map***

An electronic sanitary sewer system service area boundary map that conforms with the specifications in Section 3.8 of Attachment E1 of the General Order will be submitted between July 1, 2025 and December 31, 2025.

## **4.2 Preventative Operation and Maintenance Activities**

The elements of the City’s sewer system O&M program include:

- Proactive, preventive, and corrective maintenance of gravity sewers
- Ongoing CCTV inspection program to determine the condition of the gravity sewers
- Rehabilitation and replacement of sewers that are in poor condition
- Periodic inspection and preventive maintenance for the Pump stations and force mains

The City’s O&M program for the sanitary sewer system is designed to preserve and protect the City’s investment in that system and to provide for its ongoing resilience, and to protect public and environmental health by minimizing the potential for sewer spills. Information provided in Section 2.2 of this SSMP describe roles and responsibilities of City staff involved in implementing the program.

### ***Gravity Sewer System***

PM activities for the gravity sewer system include the following, each of which are discussed in this section.

Activity	Performed by
Cleaning	Line cleaning crew
CCTV Inspection & Condition Assessment	Camera crew

Pump Stations	Maintenance crew
---------------	------------------

### Cleaning

The City proactively cleans the sanitary sewer system, with the goal of cleaning the entire system annually. Recently installed or rehabilitated sewer lines are primarily HDPE, which is much less prone to root intrusion and other problems and therefore does not require such frequent cleaning. HDPE lines are currently on a 5-yr cleaning cycle. A separate cleaning program for “hotspot” locations is described in Table 4.1. Historical system-wide line cleaning footages are listed in Table 4.2.

**Table 4.1 Hot Spot Line Cleaning<sup>1</sup>**

Frequency (Area)	Number of Pipe Segments	Line Cleaning, LF/period	Line Cleaning, miles/period	Percent of System
6 months (Group 6 Bayside)	76	13,820	2.62	4.4%

**Table 4.2: Historical Line Cleaning Footages**

Fiscal Year	Line Cleaning, LF	Line Cleaning miles	Percent Of System
2013/2014	277,723	53	89%
2014/2015	200,417	38	64%
2015/2016	229,020	43	73%
2016/2017	274,339	52	87%
2017/2018	210,032	39.8	66%
2018/2019	85,502	35	61%
2020/2021	78,189	14.8	25%
2022/2023	112,387	21.3	35%
2023/2024	93,715	17.7	30%

The line cleaning crew executes cleaning with a variety of equipment, as described in the City’s Standard Operating Procedures listed in Appendix A1.

<sup>1</sup> Former cleaning Groups 10, 11 and 12, which comprised a total of 1.5% of the system, are no longer necessary. Groups have been repaired or replaced and are now on the normal annual schedule.

Sewer spills are attributed to a variety of causes. Historically, the primary cause of spills was root intrusion, with relatively few attributed to FOG. The City’s cleaning program is therefore primarily focused on reducing and managing root intrusion into the collection system.

#### CCTV Inspection & Condition Assessment

The City CCTV program is structured around a condition-based approach based upon the PACP rating system. Results of CCTV are the primary basis for prioritizing CIP repair/replacement projects, with age of pipelines, observations during cleaning, and occurrences of spills also informing CIP decisions. As in the case of cleaning, the frequency of CCTV inspections for HDPE lines can be lower than for other types of pipe material. Historical results of the City CCTV efforts are listed in Table 4.3.

**Table 4.3: Historical CCTV Footages**

Fiscal Year	CCTV Footages, LF	CCTV Footages miles	Percent of System
2010/2011	36,010	6.82	11.5%
2011/2012	45,304	8.58	14.5%
2012/2013	110,535	20.93	35.3%
2013/2014	125,597	23.78	40.1%
2014/2015	68,094	12.89	21.7%
2015/2016	28,557	5.41	3.2%
2016/2017	77,561	14.69	8.8%
2017/2018	77,164	33.98	57%
2018/2019	102,248	19.37	32%
2020/2021	57,686	10.93	18%
2022/2023	84,012	15.91	26%
2023/2024	115,000	21.86	35%

#### Pump Stations and Force Mains

The City operates and maintains three pump stations and associated force mains: Madrone, Hacienda, and Plaza Bay Pump Station, as shown in Figure 1.1. Firm capacities for the stations range from 300 to 1,425 gallons per minute.

Each of the three pump stations discharge to force mains and they are identified and described in Table 4.4 and Table 4.5.

The City conducts regular operational inspections of its Madrone pump station in accordance with the OP57. Inspections for the other pump stations are similar.

All pump stations include SCADA monitoring systems that automatically page City staff if unusual conditions or alarms are registered 24/7. The Public Works Collections Supervisor is

responsible for all work scheduling and documentation for the pump stations maintenance. In addition, he/she is to provide training to other collections system staff on the operations of each pump station so that staff is familiar with emergency response procedures in case of emergencies. An outside service contractor specializing in this type of maintenance provides high voltage electrical maintenance.

The Public Works Department has established emergency response procedures for pump station operations during power outages. The City contracted with DKF Solutions for the preparation of individual Pump Station Emergency Response Plans for each of the stations. Draft versions of the plans were completed in 2023 and are incorporated by reference as **Appendix B-2**.

The Pump Station Emergency Response Plans include wet well retention times, overflow containment directions and locations and directions of overflow paths from the stations. These procedures are intended to assure the maximum protection of the City's very important environmentally sensitive areas. All emergency response employees are trained and required to understand these important procedures.

**Table 4.4: Pump Station Locations and Descriptions**

Station Name	Address	# of Pumps	Pump Mfr.	Capacity, gpm	Standby Power, kW
Madrone	350 Madrone	3	Fairbanks Morse	1700	50
Hacienda	871 Hacienda	1	Chicago Yeoman	30	None
Plaza Bay	401 Millbrae Ave	2	Flygt	1700	None but bypass used

**Table 4.5: Force Main Locations and Descriptions**

Force Main Name	Length, LF	Size, Inches	Pipe Material	Installation Date
Madrone	8,000	14	Asbestos-Cement	1980
Hacienda	400	4	Ductile Iron	1980
Plaza Bay	2,000	6	Ductile Iron	1975

### ***Maintenance of Private Sewer Laterals***

The City has no responsibility for the installation, maintenance, operation, repair or replacement of private sewer laterals connected to the City mains. This includes the upper and lower lateral. However, the city will maintain that portion of sanitary sewer lateral from a cleanout wye,

inclusive of the cleanout wye, to the city sanitary sewer main under the following conditions (lower lateral):<sup>2</sup>

- A. A cleanout is provided either in the sidewalk, or within two and one-half feet of the face of curb or edge of pavement where there is no sidewalk, or in a side or rear yard within two and one-half feet of the city main; when the cleanout is located outside of these designated areas, the property owner is responsible for maintaining the sanitary sewer lateral all the way to the city sanitary sewer main, including the wye connection at the main. The above maintenance responsibilities shall be conducted in full compliance with all applicable requirements contained in this chapter.
- B. Prior to the city's acceptance of maintenance responsibility for that portion of a sanitary sewer lateral from a newly installed cleanout to the main, including the wye connection to the main, the property owner shall be responsible for having this section of lateral inspected internally by a closed circuit television camera and providing these results to the city for review. If the city determines that this section of the lateral is defective and does not meet city's requirements, the property owner shall be required to perform all repairs necessary to bring the condition of the lateral up to city standards. Property owner must obtain an encroachment permit from the city prior to performing any required repairs on the city's right-of-way. The city will accept maintenance responsibility for the section of the lateral from the new cleanout to the main only after both of the following conditions have been met: (1) the city has issued an encroachment permit for the required repairs in the city's right-of-way, and (2) all repair work is completed to the city's satisfaction. The City voluntarily reports all private sewer lateral SSOs as they become aware of the overflows.

Prior to transfer of ownership (close of escrow), property owners must perform an in-line closed circuit video inspection of their existing sanitary sewer lateral from the building to the City main per Millbrae Municipal Code section 8.20.450. The inspection is exempt if the lateral has been tested and passed within the last 5 years or if the entire lateral has been replaced within the last 20 years.

During the video inspection the City Sanitary Sewer Lateral Inspection Form shall be filled out and submitted to the Public Works Engineering Division. The video submitted must be in DVD format and must be performed from the building to the City main. The City has an approximate one-week turn-around time on all videos submitted and follow-up is performed via e-mail.

The City of Millbrae Sanitary Sewer Lateral Rebate Program provides rebates to assist property owners with the cost of upgrades made to their private sanitary sewer laterals. Recently separated sanitary sewer laterals, sewer laterals that are required to upgrade to current City code, sewer laterals at risk of overflowing and broken sewer laterals may qualify for a rebate from the City in the amount of 20% of the total cost paid for the upgrade or up to \$2,000. Funds are limited and are available on a first-come, first-serve basis. The City has currently budgets \$60,000 annually for this program. Each residence is limited to one rebate from the City.

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<sup>2</sup> Millbrae Municipal Code Section 8.20.430

### 4.3 Rehabilitation and Replacement Activities

The City's Capital Improvement Plan for the next five (5) years was developed from the CCTV inspection program that assessed the condition of all gravity sewers, and that included PACP condition assessment of each line segment. The information gathered during the condition assessment was used to select and prioritize gravity sewers for repair/rehabilitation/replacement.

The City has an annual sewer rehabilitation and replacement program to rehabilitate or replace the portions of its wastewater collection system and pump stations related assets where conditions warrant. The projects that are included in the Capital Improvement Program Budget are listed in **Appendix A-2**. The funds that support the Capital Improvement Program come from the City's sewer service charges that are based upon regular sewer service charge rate analyses.

The City generally replaces about 1.5 miles of main lines every two years through CIP projects. About 0.25 miles per year are replaced by City staff as emergency repairs. Approximately 60 lower laterals/yr are replaced by City staff as "in house" projects or by contractors as part of CIP projects. The City will replace a lower lateral when a homeowner replaces an upper lateral, if there is a cleanout.

### 4.4 Training

The City uses a combination of in-house classes and field exercises; on the job training; conferences, seminars, OSHA classes and other training opportunities that are provided in the California area. The City requires its wastewater collection system employees to be certified in Collection System Maintenance by the California Water Environment Association. The certification process requires employees to demonstrate that they have participated in 12 hours of training every two years to renew their certificates.

The City conducts department seminars for its wastewater collection system employees on both the SSMP and SERP annually including volume estimation and SSO start time determinations. This training includes field exercises in the estimation of SSO volume and SSO containment.

In addition, the City conducts annual confined space entry and certification for all employees that might be required to enter confined spaces anywhere in the City. Finally, the City conducts bi-weekly tailgate meetings with all collections system staff to discuss topics related to safety, operations and performance expectations.

The City's maintenance crews receive work-related training on a regular basis, and the City documents the training programs and activities in writing. Training courses typically attended by staff include the following:



- PACP Certification
- Underground Utility Maintenance & Construction Safety
- CWEA TCP Prep Training
- Sewer Spill Mitigation Training
- SSO Response & Reduction Workshop
- Electrical Instrumentation: Pump Station Optimization
- First Aid & C.P.R.
- Respirator Training
- Injury & Illness Prevention Program
- Safety & Traffic Control Plans for Work Zones
- Bi-Monthly, In-House Job Site Safety Tailgates including Housekeeping & Work Practices

#### **4.5 Equipment and Replacement Part Inventories**

The list of the major equipment that City uses in the operation and maintenance of its sewer system is included in **Appendix A-3: Major Sewer System Equipment Inventory**.

The City has developed a Critical Replacement Parts List. It has also developed a Replacement Parts Inventory procedure that is included in **Appendix A-4: Critical Sewer System Replacement Parts Inventory**.

#### **4.6 Outreach to Sewer Service Contractors**

Public Works Standards for Public Works Construction on City projects require plumbers and contractors to implement proper procedures for preventing blockages in sanitary sewer laterals and sewer mains. Plumbers and contractors are required to use the specific materials and methods, and to conduct good housekeeping during their work, such as removal of foreign materials in the pipes by not disposing or pushing these materials into the main. In addition, during lateral maintenance, plumbers are required to place traps downstream of the lateral to catch and dispose of all materials from cleaning.

During permit applications or response to questions from plumbers and building contractors, Public Works refers this group of people to the City Standard Drawings and the City Municipal Code that are both available on the web or at the Public Works counter at City Hall where experienced staff are always available.

The City's standard service and construction contract language requires all contractors working in the wastewater collection system to provide training for their employees on the City's SERP, or demonstrate they have been trained on an equivalent emergency response plan of their own.

## 5.0 Design and Performance Provisions

*The Plan must include the following items as appropriate and applicable to the Enrollee's system:*

### **5.1. Updated Design Criteria and Construction Standards and Specifications**

*Updated design criteria, and construction standards and specifications, for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria.*

### **5.2. Procedures and Standards**

*Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.*

## 5.1 Design Criteria & Construction Standards & Specifications

The City of Millbrae has standards and specifications in-place for its sanitary sewer system. The City standards provide for both new construction and rehabilitation and repair of all main lines sewers, trunk sewers, manholes, pump stations and other collection system appurtenances, and were developed to reflect site-specific conditions within the City. The standards are contained in the following three documents available on the [City's Public Works web site](#), which are incorporated into construction contract documents directly or by reference:

- Part 1: General Conditions. These provisions are applicable to all construction contracts.
- Part 2: Technical Conditions: Requirements for sewer system construction are primarily in Section 8, Sewer Collection System. Requirements from other Sections (e.g., Section 5, Construction of Underground Utilities) may also apply.
- Part 3: Standard Plans. Drawings S.1.1 through S.10 apply to sanitary sewers.

In addition, the City refers also to the *Greenbook Standard Specifications for Public Works Construction* and the *Caltrans Standard Plan and Specifications* as complementary documents for construction of new sewer facilities, rehabilitation, and repair construction methods. On certain occasions, the design by the private sector, manufacturer, and other agencies are adapted and used in City projects and private improvements.

## 5.2 Procedures and Standards

The City assigns an inspector or contracts with an engineering firm to inspect new construction, rehabilitation, and repair projects. The inspector ensures that all construction complies with City standards and codes prior to acceptance of the work.

The procedures and standards for inspecting and testing the installation of new sewers and its appurtenances, rehabilitation and repair projects are described in the City standards and

specifications, contract documents, manufacturer's specifications, and the City Municipal Code. These include testing of manholes, gravity pipes, force mains, cleanouts, pump stations and valves; compaction and material testing; pipe cleaning and CCTV inspections, SCADA testing; requirements for performance bonds; inspection fees; and inspector's checklists which needs to be addressed before acceptance of the work.

## 6.0 Spill Emergency Response Plan

*The Plan must include an up to date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to:*

- Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;*
- Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;*
- Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders;*
- Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained;*
- Address emergency system operations, traffic control and other necessary response activities;*
- Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;*
- Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;*
- Remove sewage from the drainage conveyance system;*
- Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;*
- Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;*
- Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;*
- Conduct post-spill assessments of spill response activities;*
- Document and report spill events as required in this General Order; and*
- Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the*

The City's ***Spill Emergency Response Plan (SERP)***, formerly referred to as the Sewer Overflow Response Manual and its companion document, the ***Sewer Spill/Backup Response Workbook***, were originally prepared by DKF solutions in 2004 and most recently updated by DKF in 2023, in accordance with the new General Order requirements. The SERP and Workbook are included as **Appendix B-1** of this SSMP. Except for coordination with storm drain agencies (discussed in Section 3) the SERP incorporates the above-listed requirements of the General Order.

*Note: Under certain headings below, only a reference to the appropriate sections of the SERP is provided. In some cases, actual text from the SERP is also reproduced under the heading, supplemented with additional discussion if needed.*

### 6.1 City Notification of Spills

The City's employees are required to report all wastewater overflows found and to take the appropriate action to secure the wastewater overflow area, properly report to the appropriate regulatory agencies, relieve the cause of the overflow, and ensure that the affected area is cleaned as soon as possible to minimize health hazards to the public and protect the environment. The

City's goal is to respond to sewer system overflows as soon as possible following notification. The City follows reporting procedures for sewer spills as set forth by the General Order.

City notification of spills may come in variety of ways including, public notification, City staff observation, contractor observation, or SCADA alarm (pump station wet wells). The communication pathways for passing information to the response team are shown in Figure 2.2 Communication Chain of Command. Additional discussion can be found in Chapter 6 of the SERP and in the discussion which follows.

### ***Public Observation (SERP Section 6.2)***

Public observation is the most common way that the City is notified of blockages and spills. Contact numbers and information for reporting sewer spills and backups are in the phone book and on the City's website: [www.ci.millbrae.ca.us](http://www.ci.millbrae.ca.us). The City's telephone number for reporting sewer problems is (650) 259-2374.

#### **Normal Work Hours**

When a report of a sewer spill or backup is made during normal work hours, the Senior Office Assistant receives the call, completes the Sewer Service Callout Form, and relays the information to the Collections Supervisor who will then dispatch a Collections Crew to the incident.

#### **After Hours**

After hours callers are directed to call County Dispatch, which will notify the Standby Employee indicated on the most recent Standby Callout List.

When calls are received, either during normal work hours or after hours, the individual receiving the call will collect the following information:

- Date, time, and method of notification
- Specific location of potential problem
- Nature of call
- In case of spill, estimated start time of overflow
- Caller's name and telephone number
- Caller's observation (e.g., odor, duration, location on property, known impacts, indication if surface water impacted, appearance at cleanout or manhole)
- Other relevant information

### ***City Staff Observation (SERP Section 6.4)***

City staff conduct periodic inspections of its sewer system facilities as part of their routine activities. Any problems noted with the sewer system facilities are reported to appropriate City staff that, in turn, responds to emergency situations. Work orders are issued to correct non-emergency conditions.

#### ***Contractor Observation:***

The following procedures are to be followed in the event that a contractor/plumber causes or witnesses a spill. If the contractor/plumber causes or witnesses an spill they shall:

1. Immediately notify the City
2. Protect storm drains
3. Protect the public
4. Provide information to the City Field Crew such as start time, appearance point, suspected cause, weather conditions, etc.
5. Direct ALL media and public relations requests to the Director of Public Works.

Figure 6.1 provides an overview of the process and actions taken when receiving a report of spill or backup.

## **6.2 Spill Response**

The City will respond to spills as soon as feasible following notification. Figure 6-2 provides an overview of the response activities. More detailed flowcharts useful for guiding Spill Response activities are provided in Tab C of the Sewer Spill/Backup Response Workbook. The following is intended to be a summary of response activities. Refer to the SERP and the Workbook for a complete discussion of spill response.

### ***First Responder Priorities (SERP Section 7.2)***

The first responder's priorities are:

- Prompt response to spills
- To follow safe work practices.
- To respond promptly with the appropriate and necessary equipment.
- To reduce spill volume and contain the spill wherever feasible.
- To restore the flow as soon as practicable.
- To minimize public access to and/or contact with the spilled sewage.
- To promptly notify the Supervisor in the event of a spill needing additional resources, and/or impacting environmentally sensitive area.
- To return the spilled sewage to the sewer system.
- To restore the area to its original condition (or as close as possible). Collect information for the prevention of future spills.
- To properly document the spill and response activities, including photos and/or video where practical. Forms in the Sanitary Sewer Spill/Backup Response Workbook are available for this purpose, but other methods/forms may be used if they provide similar documentation.

Figure 6-1: Overview of Receiving a Sewer Spill or Backup Report

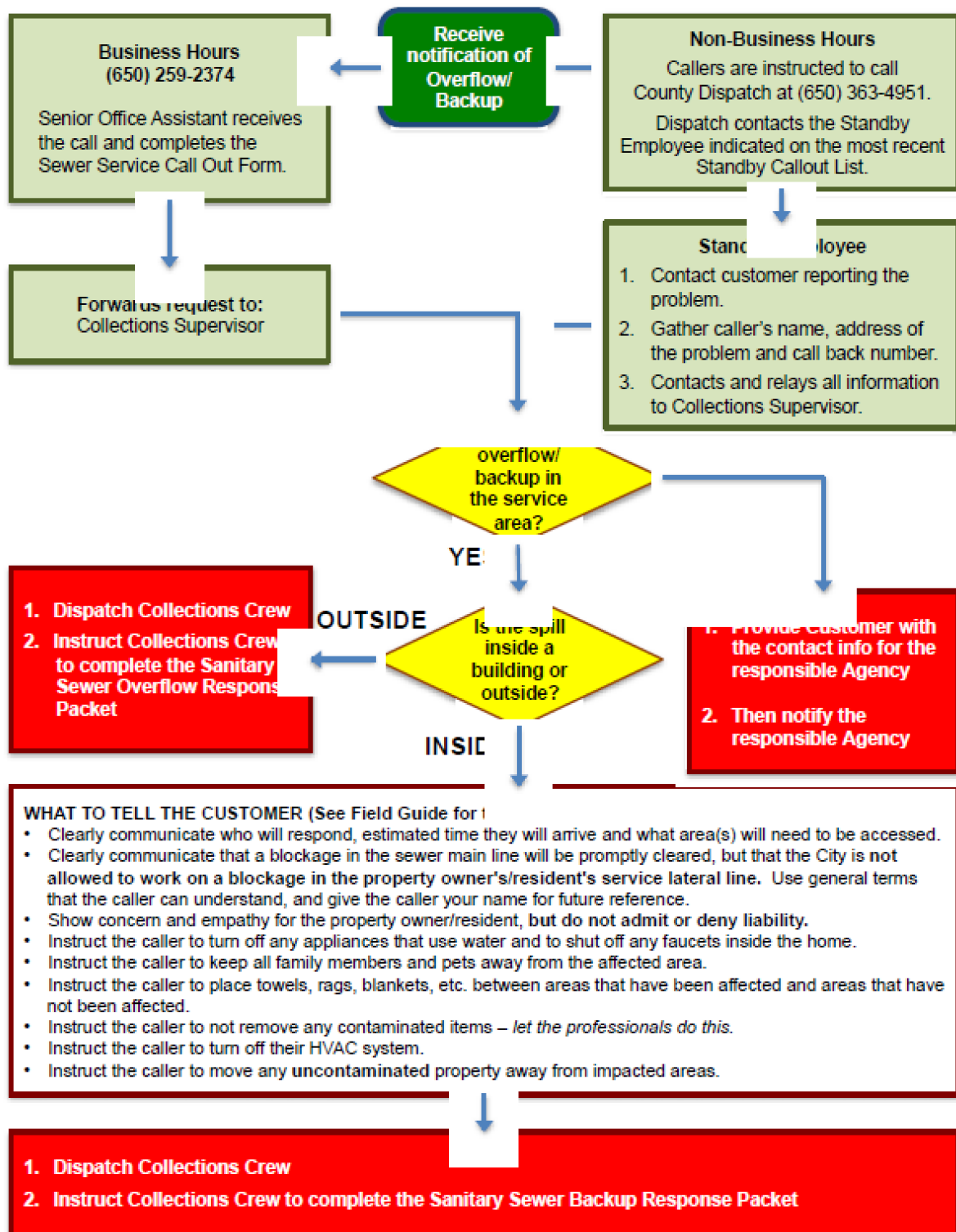
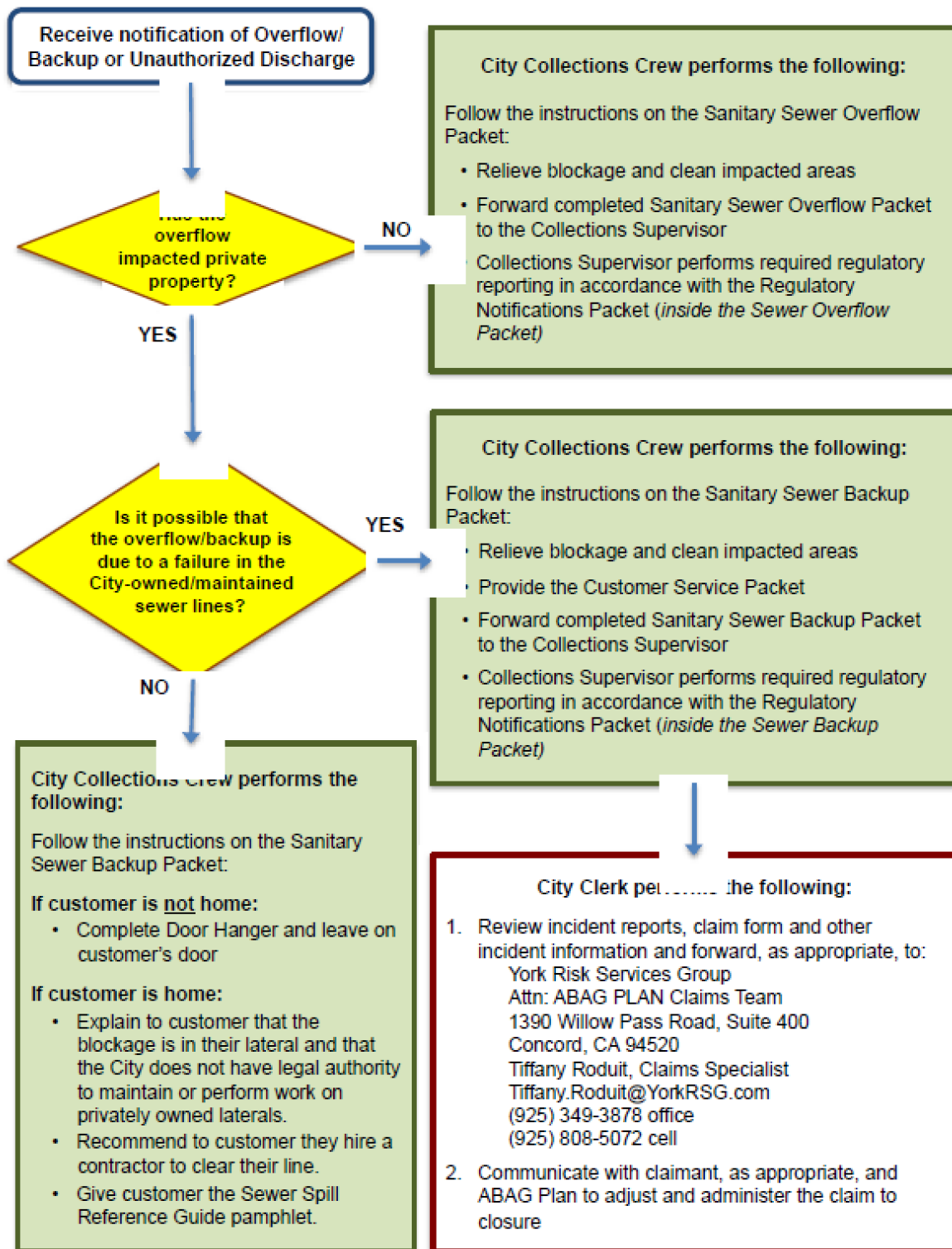


Figure 6-2: Overview of Spill/Backup Response





### ***Safety (SERP Section 7.3)***

The first responder is responsible for following safety procedures at all times. Special safety precautions must be observed when performing sewer work. There may be times when City personnel responding to a sewer system event are not familiar with potential safety hazards peculiar to sewer work. In such cases it is appropriate to take the time to discuss safety issues, consider the order of work, and check safety equipment before beginning response activities.

### ***Initial Response (SERP Section 7.4)***

The first responder must respond to the reporting party/problem site and visually check for potential sewer stoppages or overflows.

The first responder will:

- Note arrival time at the site of the spill/backup.
- Verify the existence of a public sewer system spill or backup.
- Determine if the overflow or blockage is from a public or private sewer.
- Identify and assess the affected area and extent of spill.
- Contact reporting party if time permits.
- If the spill is large or in a sensitive area, document conditions upon arrival with photographs. Decide whether to proceed with clearing the blockage to restore the flow or to initiate containment measures. The guidance for this decision is:
  - Small spills (i.e., spills that are easily contained) – proceed with clearing the blockage.
  - Moderate or large spill where containment is anticipated to be simple – proceed with the containment measures.
  - Moderate or large spills where containment is anticipated to be difficult – proceed with clearing the blockage; however, whenever deemed necessary, call for additional assistance and implement containment measures.
  - Document the spill according to the requirements in Section 10 of the SERP, including taking photo, and/or videos of overflowing manhole(s)/cleanout(s).
- Take steps to contain, recover, and return the spill to the sanitary sewer as feasible. the spill. For procedures refer to the SERP Chapter 7 (Spill Response Procedures) and SERP Appendix E (Sanitary Sewer Spill/Backup Response Workbook).

### ***Initiate Spill Containment Measures (SERP Section 7.5)***

The first responder will attempt to contain as much of the spilled sewage as possible using the following steps:

- Determine the immediate destination of the overflowing sewage.
- Plug storm drains using air plugs, sandbags, and/or plastic mats to contain the spill, whenever appropriate. If spilled sewage has made contact with the storm drainage system, attempt to contain the spilled sewage by plugging downstream storm drainage facilities.
- Contain/direct the spilled sewage using dike/dam or sandbags.
- Vacuum retrieve sewage whenever practical.

- Pump around the blockage/pipe failure.

#### ***Restore Flow (SERP Section 7.6)***

Using the appropriate cleaning equipment, set up downstream of the blockage and hydro- clean upstream from a clear manhole. Attempt to remove the blockage from the system and observe the flows to ensure that the blockage does not reoccur downstream. If the blockage cannot be cleared within a reasonable time from arrival, or sewer requires construction repairs to restore flow, then initiate containment and/or bypass pumping. If other assistance is required, immediately contact the Public Works Superintendent.

#### ***Equipment (SERP Section 7.7)***

The following specialized equipment supports the City's SERP.

- *Closed Circuit Television (CCTV) Inspection Unit* – A CCTV Inspection Unit is required to determine the root cause for all spills from gravity sewers.
- *Camera* -- A digital or disposable camera is required to record the conditions upon arrival, during clean up, and upon departure.
- *Emergency Response Trucks* -- A utility body pickup truck, or open bed is required to store and transport the equipment needed to effectively respond to sewer emergencies. The equipment and tools will include containment and clean up materials.
- *Portable Generators, Portable Pumps, Piping, and Hoses* – Equipment used to bypass pump, divert, or power equipment to mitigate an SSO.
- *Combination Sewer Cleaning Trucks* -- Combination high velocity sewer cleaning trucks with vacuum tanks are required to clear blockages in gravity sewers, vacuum spilled sewage, and wash down the impacted area following the SSO event.
- *Power Rodder* – Equipment used to clear blockages that are in the hilly areas and that are hard to reach with the combo unit. Also used when laterals are draining flat- sloped to the main.
- Air plugs, sandbags and plastic mats
- Spill Sampling Kits
- Portable Lights

The standard operating procedures for all equipment listed in Appendix A-1 are located on the City server, in binders in the main office, in **Appendix A-1** And on vehicles.

### **6.3 Recovery and Cleanup**

#### ***Spill Volume Estimation***

Refer to Section 8.1 of the SERP for a description of the methods that can be used to estimate flow and/or volume of a sanitary sewer spill. Formulas for use performing calculations, and visual aids to estimate flows from manholes are provided in Tab E of the Sewer Spill/backup Response Workbook. Wherever possible, document the estimate using photos and/or video of the SSO site before and during the recovery operation.

### ***Spill Recovery (SERP Section 8.2)***

Vacuum up and/or pump the spilled sewage and washdown water and discharge it back into the sanitary sewer system. Thoroughly recover and dispose of sewage and washdown water.

### ***Clean-up and Disinfection (SERP Section 8.3)***

Refer to SERP Section 8.3 for clean-up procedures for different spill conditions and locations.

### ***Public Notification (SERP Section 8.4)***

Refer to SERP Section 8.4 for public notification. Water Quality Monitoring

## **6.4 Water Quality Monitoring**

**For sewage spills in which an estimated 50,000 gallons or greater discharge into a surface water, the City is required to conduct water quality sampling as soon as possible but no later than 18 hours after the City's knowledge of a potential discharge to surface water.** Refer to Section 9 of the SERP for a thorough discussion of water quality monitoring requirements, including sampling parameters, locations, equipment, laboratory requirements, safety, and other related information. An SOP for surface water sampling is provided in Tab G of the Sewer Spill/Backup Response Workbook.

## **6.5 Regulatory Notification, Reporting and Record Keeping**

### ***Spill Documentation***

In accordance with the General Order, the City maintains records for each spill. Records include:

- Documentation of spill location, duration and other related information
- Documentation of response steps and/or remedial actions
- Photographic evidence to document the extent of the SSO, field crew response operations, and site conditions after field crew SSO response operations have been completed. The date, time, location, and direction of photographs taken will be documented.
- Documentation of the spill volume, volume recovered, volume that reached surface water, and the methodologies used for how these volumes were calculated or estimated, including all assumptions made.

The Sewer Spill/Backup Response Workbook provides forms that can be used to document information regarding the spill and response activities, and for subsequent use in reporting to the State Water Board's CIWQS database. The specific reporting requirements for each spill category are listed in *Attachment E1 Notification, Monitoring, Reporting, and Recordkeeping Requirements* of the General Order.

### ***Spill Categories***

Proper identification of the spill category is essential for regulatory notification/reporting purposes, especially in the case of a Category 1 spills of 1000 gallons or greater which discharge to surface waters, for which notification to Cal OES must be provided within 2 hours of the City's knowledge of the spill. The 2-hr notification requirement also applies to Category 2 spills of 1000

gallons or greater which discharge to Waters of the State, which is defined more broadly than “surface waters” and includes discharges to groundwater.

Spill category definitions are contained in Section 1.4 of this SSMP, Section 3 of the SERP, and in Section 5.13.1 of the General Order. (The same definitions appear in each of these locations).

### ***Spill Notification and Reporting***

Spill notification and reporting requirements are summarized by spill category in a series of tables in Section 10.2 of the SERP. These tables replicate tables in *Attachment E2- Summary Of Notification, Monitoring And Reporting Requirements* of the General Order. In addition, the SERP Sewer Spill/Backup Response Workbook, Attachment B-1 is a table that summarizes these reporting requirements. That table is replicated on the following page.

The specific reporting requirements for each spill category are listed in Appendix A of the SERP, which replicate the listings in *Attachment E1 - Notification, Monitoring, Reporting, and Recordkeeping Requirements* of the General Order. In addition, the State Water Board’s web site for the sewer overflow program provides [Guidance For Reporting Category 1 Spills in the California Integrated Water Quality System \(CIWQS\)](#). This document walks through the entire process for logging into CIWQS and initiating, certifying and amending a spill report, a flowchart for determining the correct spill category, and additional guidance for each of the items required in the spill report. The document can be downloaded for quick reference.

For reporting purposes, if one spill of whatever category results in multiple appearance points from the sewer system, a single spill report should be submitted into CIWQS that includes the GPS coordinates for the location of the spill appearance point closest to the failure point and descriptions of the locations of all other discharge appearance points.

A Spill Report does not have to be completed in CIWQS in one sitting. Incomplete reports can be saved in CIWQS by hitting the “Save Work in Progress” button on the report screen. Upon re-entering CIWQS, the program provides the necessary tools to locate a previously saved draft report. If spill information is entered into CIWQS by a Data Submitter, the Data Submitter can complete a draft spill report and click on the “Ready to Certify” button. The LRO will receive an automated email notification that a spill report is ready for certification.<sup>3</sup>

### ***Reporting of Sewer Lateral Spills***

Refer to Section 4.2.3 of this SSMP for a discussion of ownership and responsibility for maintenance of private laterals. If the City determines that a private lateral spill was caused by a failure of the City’s sewer system (e.g., a main blockage that caused a spill from a lateral) or from a blockage in a lower lateral for which the City has taken responsibility per Section 4.2.3, then the spill should be reported in CIWQS under the appropriate category.

The City does **not** report private lateral spills that are not caused by a failure of the City sewer system, or from lower laterals for which it has not taken responsibility for maintenance.

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<sup>3</sup> This statement applies specifically to Category 1 spills. Procedures may be different for other spill categories.  
City of Millbrae SSMP 2024 Final.DocxSewer System Management Plan

### ***Spill Report Certification***

Spill reports can be submitted in CIWQS by any designated Data Submitter, but only the designated LRO(s) can certify reports. The City's current LRO is listed in Section 2.1.

The CIWQS Spill Report details the process for submitting a certified spill report. The process is well described in the above-referenced guidance document.

### ***Amending a Spill Report***

A certified Spill Report can be amended in order to correct or add additional information **within 90 calendar days** of the spill end date, by amending the original report or by adding an attachment to the Spill Report in CIWQS. The amended report must again be certified. **After 90 calendar days**, the City must contact the State Water Board at [SanitarySewer@waterboards.ca.gov](mailto:SanitarySewer@waterboards.ca.gov) to request to amend a Spill Report. The LRO must submit justification for why the additional information was not reported within the amended Spill Report due date.

### ***Spill Technical Report for Category 1 Spills Greater Than 50,000 gallons***

For any spill in which 50,000 gallons or greater discharge into a surface water, the City is required to submit a Spill Technical Report **within 45 days** of the spill end date. Refer to Section 9.14 of the SERP or to Section 3.1.3 of *Attachment E1 Notification, Monitoring, Reporting, and Recordkeeping Requirements* of the General Order for the information that must be included in the report.

**Table 6.1: Summary of Notification & Reporting Requirements**

Deadline	Category 1 Spill*	Category 2 Spill**	Category 3 Spill**	Category 4 Spill**
2 hours after awareness of spill	Within two (2) hours of the City's knowledge of a Category 1 spill of 1,000 gallons or greater, discharging or threatening to discharge to Waters of the State, notify CalOES and obtain a notification control number.	Within two (2) hours of the City's knowledge of a Category 2 spill of 1,000 gallons or greater threatening to discharge to Waters of the State, notify CalOES and obtain a notification control number.	-	-
Within 18 hours of awareness of spill	Conduct water quality sampling of the receiving water within 18 hours of initial knowledge of spill of 50,000 gallons or greater to surface waters.	-	-	-
3 Business Days after awareness of spill	Submit Draft Spill Report in the CIWQS database.	Submit Draft Spill Report in the CIWQS database.	-	-
15 Days after the spill end date	Submit Certified Spill Report within 15 calendar days of the spill end date. (Submit Amended Spill Report, as needed, within 90 calendar days after the spill end date.)	Submit Certified Spill Report within 15 calendar days of the spill end date. (Submit Amended Spill Report, as needed, within 90 calendar days after the spill end date.)	-	-
Within 30 calendars days after the end of the calendar month in which the spill occurs	-	-	Submit monthly Certified Spill Report to the online CIWQS Sanitary Sewer System Database (Submit Amended Spill Report, as needed, within 90 calendar days after the Certified Spill Report due date.)	Certify monthly, the estimated total spill volume exiting the sanitary sewer system, and the total number of all Category 4 spills into the online CIWQS Sanitary Sewer System Database.
45 days after spill end date	Submit Technical Report within 45 calendar days after the spill end date for a Category 1 spill in which 50,000 gallons or greater discharged to surface waters; and	-	-	-
By February 1 <sup>st</sup> after the end of the calendar year in which the spills occur.	-	See + note below.	-	Upload and certify a report, in an acceptable digital format, of all Category 4 spills to the online CIWQS Sanitary Sewer System Database.

\* A spill from an Enrollee-owned and/or operated lateral that discharges to a surface water is a Category 1 spill.

\*\* Agency owned lateral spills (Cat 2-4) to be reported by Feb 1 of the following year.

- **Monthly Spill Reporting of Non-Category 1 Lateral Spills:** If either (1) no spills occur during a calendar month or (2) only Category 4, and/or Enrollee-owned and/or operated lateral spills (that do not discharge to a surface water) occur during a calendar month, the Enrollee shall certify, within 30 calendar days after the end of each calendar month, either a "No-Spill" certification statement, or a "Category 4 Spills" and/or "Non-Category 1 Lateral Spills" certification statement, in the online CIWQS Sanitary Sewer System Database, certifying that there were either no spills, or Category 4 and/or Non-Category 1 Lateral Spills that will be reported annually for the designated month.
- **Annual Certified Spill Reporting of Category 4 and/or Lateral Spills:** For all Category 4 spills and spills from its owned and/or operated laterals that are caused by a failure or blockage in the lateral and that do not discharge to a surface water, the Enrollee shall annually upload and certify a report, in an appropriate digital format, of all recordkeeping of spills to the online CIWQS Sanitary Sewer System Database, by February 1st after the end of the calendar year in which the spills occurred.

## ***Annual Reporting***

The General Order requires submission of an Annual Report by April 1 of each year. The report covers the previous calendar year, taking the place of (and expanding upon) the previous General Order's Collection System Questionnaire. The required content for the Annual Report is described in *Attachment E1 Notification, Monitoring, Reporting, and Recordkeeping Requirements* of the General Order, starting on p. E1-17. Much of the required information does not change from year to year; other information is specific to the reporting period (e.g., cleaning footages, spill causes, actions to address system deficiencies).

The Annual Report is generated through an interactive process on the State Board Web Site. After logging into the City's CIWQS account, Click on "Sanitary Sewer Systems" and then "Annual Report". A document to aid in preparing the report is available at [Guidance For Submitting The Annual Report In The California Integrated Water Quality System \(CIWQS\)](#).

Section 5.11 of the General Order (main body) requires the following performance indicators, depicted as 10-year trend charts, be included in the Annual Report:

- Total annual spill volume, per Spill Category
- Total annual number of spills, per Spill Category

The graphs are generated by CIWQS based on historic spill data submitted by the City. Refer to the Guidance Document for the process of generating and attaching the graphs to the Annual Report.

## ***Record Keeping***

In addition to spill documentation referred to above, the City maintains records of all complaints whether or not they result in spills. Refer to SERP Section 10.3

Records are also kept for all training that is provided in support of this Plan. The records for all scheduled training courses and for each overflow emergency response training event and will include date, time, place, content, name of trainer(s), and names and titles of attendees.

## ***Coordination with Storm Drain Agency and other Utilities***

As described in Section 3, the Public Works Collections Supervisor and City staff are also responsible for operating the municipal separate storm sewer system (MS4) within the City, so that coordination with storm drainage system agency is automatic. The Collections group coordinates with the WWTP's Lab and Source Control Supervisor, who has responsibility for the FOG Program. The fact that the Public Works Deputy Director of Utilities and Operations is the designated LRO for CIWQS also facilitates close coordination between the Collections group and City utilities operations.

## ***Post-Spill Assessments***

Refer to SERP Section 11 for a discussion of post-spill assessment and failure analysis.

## ***Spill Response Training***

Refer to SERP Section 12 for a discussion of Initial and Annual Resresher



## 7.0 Blockage Control Program

*The Sewer System Management Plan must include procedures for the evaluation of the Enrollee's service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags and debris. If the Enrollee determines that a program is not needed, the Enrollee shall provide justification in its Plan for why a program is not needed.*

*The procedures must include, at minimum:*

- An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances;*
- A plan and schedule for the disposal of pipe-blocking substances 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 substances generated within a sanitary sewer system service area;*
- The legal authority to prohibit discharges to the system and identify measures to prevent spills and blockages;*
- Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping and reporting requirements;*
- Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the fats, oils, and grease ordinance;*
- An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and*
- Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above.*

### 7.1 Introduction

FOG has not been considered a major problem in the City and historically contributed to a relatively a small percentage of the total spills. As indicated in Section 9 Table 9-2, the majority of City SSOs are caused by roots and debris in the collection systems, and by other causes. Nevertheless, the City recognizes the potential for FOG to cause or contribute to spills and has implemented FOG control program that contains the elements referenced above. The FOG Program is administered through the WPCP's Environmental Services Group, under the supervision of the Laboratory and Source Control Supervisor. The Preventative Operation and Maintenance Activities described in Section 4.2 of this SSMP, which are aimed at minimizing the number of spills from all causes, are performed by the Collections group of the Utilities and Operations Division, working under the Collections Supervisor.

### 7.2 FOG Control Program

The WWTP considers FOG a "pollutant of concern" and the FOG Program targets public education efforts for FOG reduction to both residential and commercial customers, as well as requirements for installation and maintenance of grease removal devices at certain food service establishments. These requirements were formalized City's April 2, 2021 *Fats, Oils and Grease (FOG) Policy for Food Service Establishments*, a copy of which is included as **Appendix C** of this SSMP.



The FOG Control Program is intended to work in conjunction with the City's preventive maintenance program (sewer cleaning) to prevent FOG-related spills. Elements of the City's FOG Control Program include:

- Requirement for the installation of grease removal devices (GRDs)
- Permitting food service establishments (FSE)
- Requirement for proper operation and maintenance of GRDs
- Verification of grease handling and disposal practices
- FSE inspections
- Public Education and Outreach, and
- Enforcement.

FSEs subject to the FOG Policy are required to install GRDs consistent with the recommended procedures for design, construction and installation based on the current adopted Millbrae Plumbing Code enforced by the WPCP. Plan check review for grease removal device installation is coordinated during the building permit application process.

In addition, FSEs subject to the FOG Policy are required to obtain a wastewater discharge permit, which provides the legal framework to enforce the elements of the FOG Policy. The discharge permit contains specific permit conditions, which require FSEs to implement FOG Best Management Practices (BMP) including:

- Proper GRD operation and maintenance
- Documentation and retention of GRD pumping/cleaning activities
- Employee training on FOG handling BMPs, proper equipment cleaning, spill response clean-up and control procedures
- Prohibition on the installation and use of food waste disposal grinder
- Proper disposal of grease, oils, and meat fat
- Prohibition on the use or addition of chemical or biological agent for the maintenance of GRD

The discharge permit is also to provide information on facility specifics relating to local limits, inspection requirements and rights of entry, reporting requirements relating to spill or accidental discharges, records retention, confidential information, limit or permit transfer, perjury clause, fees, permit duration and renewal process. The City progressive enforcement actions for various field violation scenarios include verbal and written notice of correction, notices of violations, cleanup requirements, and administrative and criminal penalties. Each level of corrective action includes a schedule to achieve timely compliance. Inspections and enforcement by City environmental programs staff

Public education and outreach as also an integral element of the FOG Program. Outreach is provided to FSE staff and management during routine inspection. Other materials distributed may include grease scrapers, list of grease haulers and cooking oil recyclers, and general technical

information on grease removal devices. Inspectors strive to provide educational information to ensure FSE staff and management to ensure continued compliance with their discharge permit. The Collection crew provides additional outreach by distributing FOG door hangers and brochures to homeowners during service calls and routine preventive maintenance activity. FOG-related brochures are available on the City website.

### **7.3 Implementation Plan for Public Education and Outreach**

In order to educate the public on proper FOG disposal, a residential outreach program was initiated by the City in 2010. This program is ongoing, and includes the following activities:

- FOG prevention messages in local newspapers, City Newsletter, City cable channel, and the City website.
- Participation in public outreach events.
- Distribution of grease collection cans, posters, handouts, and small promotional gifts at special events.
- Regular display of educational handouts at library, City Hall, and Community Center.
- Distribution of educational handouts at information distribution events throughout the year.

The City has been active in promoting environmental awareness through newsletters, posters, television, website, and various media, and has also participated in a number of events throughout the year. In addition, the City has an ongoing commercial outreach program to educate commercial establishments on the use of BMPs and the proper maintenance of grease recovery devices to reduce FOG. This program includes the following activities:

- Continual permitting and monitoring.
- Provide regular quarterly report correspondence to members of the business community to educate business owners, managers, and staff regarding FOG BMPs.
- Provide multi-language grease trap cleaning posters to new permittees.
- Provide PowerPoint presentation for restaurants that describes BMPs for grease control.

Permitting, monitoring, and regular correspondence provided opportunities to educate business owners, managers, and staff regarding FOG BMPs. The City also participates regionally with other agencies in the development and maintenance of websites that promote environmentally friendly resources for the proper disposal of wastes and FOG.

### **7.4 Hot Spot Cleaning**

The City's Hot Spot Cleaning Program is described in Section 4 and Table 4.1. This Program evaluates the pipe segments that are FOG or blockage problem areas, developed proper maintenance actions to assure they do not become overflows by the proper assignment of frequent maintenance activities to remedy the impacts. In addition, the program defines the means that pipes are placed on and taken off the Hot Spot maintenance list.

## **7.5 Legal Authority for Blockage Control Program**

The legal authority to implement, monitor and enforce the elements of the FOG Program and FOG Policy, and to prevent the discharge of debris that may cause blockages in the collection system is provided by Title 8, Chapter 8.20 of the Municipal Code and by Title 9, Chapter 9.25. which adopts the California Plumbing Code. Specific code sections are listed in Section 3, Table 3.1 of this SSMP.

## **8.0 System Evaluation Capacity Assurance and Capital Improvements**

*The Plan must include procedures and activities for:*

- Routine evaluation and assessment of system conditions;
- Capacity assessment and design criteria;
- Prioritization of corrective actions; and
- A capital improvement plan.

### **8.1 System Evaluation and Condition Assessment**

*The Plan must include procedures to:*

- Evaluate the sanitary sewer system assets utilizing the best practices and technologies available;
- Identify and justify the amount (percentage) of its system for its condition to be assessed each year;
- Prioritize the condition assessment of system areas that:
  - Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies;
  - Are located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas;
  - Are within the vicinity of a receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List;
- Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods;
- Utilize observations/evidence of system conditions that may contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State;
- Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities; and
- Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to: sea level rise; flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions.

### **8.2. Capacity Assessment and Design Criteria**

*The Plan must include procedures to identify system components that are experiencing or contributing to spills caused by hydraulic deficiency and/or limited capacity, including procedures to identify the appropriate hydraulic capacity of key system elements for:*

- Dry-weather peak flow conditions that cause or contributes to spill events;
- The appropriate design storm(s) or wet weather events that causes or contributes to spill events;
- The capacity of key system components; and
- Identify the major sources that contribute to the peak flows associated with sewer spills.
- Necessary redundancy in pumping and storage capacities.

*The capacity assessment must consider:*

- Data from existing system condition assessments, system inspections, system audits, spill history, and other available information;
- Capacity of flood-prone systems subject to increased infiltration and inflow, under normal local and regional storm conditions;

- Capacity of systems subject to increased infiltration and inflow due to larger and/or higher-intensity storm events as a result of climate change;
- Increases of erosive forces in canyons and streams near underground and above-ground system components due to larger and/or higher-intensity storm events;
- Capacity of major system elements to accommodate dry weather peak flow conditions, and updated design storm and wet weather events; and
- Necessary redundancy in pumping and storage capacities.

### **8.3. Prioritization of Corrective Action**

*The findings of the condition assessments and capacity assessments must be used to prioritize corrective actions. Prioritization must consider the severity of the consequences of potential spills.*

### **8.4. Capital Improvement Plan**

*The capital improvement plan must include the following items:*

- Project schedules including completion dates for all portions of the capital improvement program;
- Internal and external project funding sources for each project; and
- Joint coordination between operation and maintenance staff, and engineering staff/consultants during planning, design, and construction of capital improvement projects; and Interagency coordination with other impacted utility agencies.

## **8.1 Condition Assessment**

As noted in Section 4 of this SSMP, the City uses the results of CCTV Inspection and the PACP rating system to prioritize CIP repair/replacement projects, with age of pipelines, observations during cleaning, and occurrences of spills also informing CIP decisions. The Capital and Operating budget allocates approximately \$1,000,000 per year for the sewer replacement program, in addition to allocating funds for other specified projects. As indicated in Section 1 Table 1.3, 30% of the system main lines have been replaced since 2000.

## **8.2 Capacity Assessment and Design Criteria**

The City completed a capacity assurance evaluation documented in the November 2014 Wet Weather Alternative Analysis (Alternatives Analysis) Report by West Yost Associates. The Alternatives Analysis included evaluations of the collection system pipelines and force mains, pump stations and treatment plant for current and future dry and wet weather conditions. Because the City is essentially fully built out, the evaluations were conducted to determine the impacts of infiltration and inflow on the entire City sewer related facilities. The Alternatives Analysis determined that under both average and peak day dry weather conditions there was adequate capacity in the collection system and pump stations. However, during peak wet weather conditions several portions of the collection system and the Madrone Street Pump Station and force main had insufficient capacity to convey peak wet weather flows.

The Alternatives Analysis included the use of the City hydraulic model to define pipelines with inadequate capacity. The model was calibrated using the results of flow monitoring in the winter of 2010/2011 by V&A Engineering and reported in the Millbrae Flow Monitoring and I&I Report, August 2011. This information, the model and field flow monitoring were used to prepare the Capacity Assurance Report (CAR). The Alternatives Analysis developed various alternatives to assure adequate capacity in the collection system pipes and the Madrone Pump Station by a

combination of increasing capacity and by reducing rainfall dependent infiltration and inflow in the most economical manner. The Alternatives Analysis identified a recommended schedule for all the recommended projects to alleviate the wet weather capacity issues in priority order.

The capacity-related design criteria, including base wastewater flow and peaking factors, are included in the 2012 Capacity Assurance Report and the 2014 Wet Weather Alternatives Design Report including the use of a design storm with a return frequency of 10-years, 24-hour.

### **8.3 Prioritization**

The above-described condition and capacity assessments are used to prioritize corrective actions. The likely severity of potential spills (e.g., potential volume, proximity to surface waters) is a factor taken into account in the prioritization process.

### **8.4 Capital Improvement Plan**

The City annually prepares/updates a list of capital improvement projects that includes projects to address identified wastewater collection system capacity issues from the above Alternatives Analysis and projects identified through the condition assessment process. Collections and Engineering staff select and prioritize the projects to be included on the annual list. The City's current 5-year Capital Improvement Program Budget is included as Appendix A-2, Renewal & Replacement Program Budget. In 2022-2023, the City completed the Aviadore / E. Millbrae Avenue capacity upgrade project. Another key capacity-related project, expansion of the Madrone Lift Station, is scheduled for 2025.

### **8.5 Resiliency Considerations**

The primary hazards relative to the impact of climate change on the collection system and treatment plant are 1) Shoreline flooding from SF Bay resulting from storm surges and high tides, which are increasing with sea level rise, and 2) Inland flooding during major rainfall events that overwhelm local creeks and storm drain systems and are exacerbated by high tides. Inland flooding also increases rates of inflow and infiltrated into the system.

To address these hazards, the San Mateo County Flood and Sea Level Rise Resiliency District (OneShoreline) was established by State legislation in 2020 to support independent efforts in a coordinated and connected way. A key project being undertaken by the District is the Millbrae and Burlingame Shoreline Resilience Project (MBSRP), which is designed to provide long-term climate resilience against sea level rise and extreme storms for developed, natural, and public access areas, and to enhance public access and recreation, and to promote healthy and sustainable ecosystems proximate to the Bay shoreline. Separate, but coordinated projects are being undertaken by San Francisco Airport to the north, and City of San Mateo to the south.

Alternatives being evaluated under the MBSRP must meet the SF Bay Protection Standard, which is FEMA's 100-year base flood elevation plus six feet of future sea level rise. The alternatives must also provide for conveyance of increased stormwater runoff from inland flooding.

A Conceptual Alternatives Feasibility Analysis which describes and evaluates three alternatives for the MBSRP was released in October 2023. The public review and comment process and other

related activities are ongoing. Upon selection of a preferred alternative, the EIR process and CEQA analysis will commence in Summer of 2025.

Information on the MBSRP is available at <https://onshoreline.org/projects/millbrae-burlingame/>  
The Conceptual Alternatives Feasibility Analysis and other related project document is available at [https://onshoreline.org/wp-content/uploads/2023/11/Conceptual Alternatives Feasibility Analysis Final Rev.pdf](https://onshoreline.org/wp-content/uploads/2023/11/Conceptual_Alternatives_Feasibility_Analysis_Final_Rev.pdf)

Impacts of climate change are also taken into account as part of the City's master planning processes and are taken into consideration when prioritizing future CIP capacity upgrades in storm and sewer systems.

## 9.0 Monitoring, Measurement, and Program Modifications

*The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:*

- Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities;*
- Monitoring the implementation and measuring the effectiveness of each Plan Element;*
- Assessing the success of the preventive operation and maintenance activities;*
- Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and*
- Identifying and illustrating spill trends, including spill frequency, locations and estimated volumes*

### 9.1 Adaptive Management

The City's SSMP is intended to be a living document that, at a minimum, is updated at the frequency specified in the General Order. The SSMP Audit (Section 10) is used as the primary aid to evaluate SSMP effectiveness, and along with other assessment tools such as results of CCTV inspection, to guide any needed changes to operational procedures and activities. The specific performance indicators tracked by the City are described in the following section.

### 9.2 Performance Indicators

The indicators that the City will use to measure and evaluate the performance of its wastewater collection system and the effectiveness of its SSMP are:

- Total number of spills;
- Number of spills for each cause (roots, grease debris, pipe failure, capacity, Pump station failures, and other);
- Portion of sewage recovered compared to total volume spilled: and
- Volume of spilled sewage discharged to Waters of the State.
- CCTV inspection, linear feet
- Mainline cleaning, linear feet
- Hot spot cleaning, linear feet
- QA/QC of cleaned sewer mains, percentage
- Private lateral inspections, each
- Smoke testing, linear feet

Table 9.1 lists the total number of spills for all categories over the period of FY 2009/2010 through CY 2024. Performance is shown separately for gravity mains, pump stations, and force mains. As indicated in Table 1, there is considerable year-to-year variability in the total number of spills, but there has been an overall downward trend over the years



**Table 9.1: Gravity Sewer, Pump Station, and Force Main Spills**

Period	Gravity Sewer Spills	Pump Station Spills	Force Main Spills
FY 2009/10	45	0	0
FY 2010/11	26	0	0
FY 2011/12	38	0	0
FY 2012/13	13	0	0
FY 2013/14	3	0	0
FY 2014/15	6	0	0
FY 2015/16	1	0	0
FY 2016/17	8	0	0
July – Dec 2017	4	0	0
CY 2018	7	0	0
CY 2019	3	0	0
CY 2020	3	0	0
CY 2021	4	0	0
CY 2022	4	0	0
CY 2023	1	0	0
CY 2024*	2	0	0

\*Through October 2024

Table 9-2 lists the total number of spills by cause. The number of spills attributed to roots has decreased dramatically, as a result of an aggressive cleaning and pipe replacement program. Relatively few spills are attributed to FOG, suggesting that the FOG Program and hot spot cleaning has been effective. Since 2018, debris has contributed to the largest number of spills. In general, debris-induced spills are more difficult to control through preventative maintenance.

**Table 9.2: Totals Spills by Cause**

Period	Roots	Debris	FOG	Capacity	Vandalism	Pipe Failure	Other	Total
FY 2009/10	25	12	2	5	0	1	0	45
FY 2010/11	14	3	1	6	1	1	0	26
FY 2011/12	22	12	1	0	0	3	0	38
FY 2012/13	6	4	0	1	0	2	0	13
FY 2013/14	2	1	0	0	0	0	0	3
FY 2014/15	3	1	1	0	0	1	0	6
FY 2015/16	1	0	0	0	0	0	0	1
FY 2016/17	3	1	1	2	0	0	0	7
Jul-Dec 2017	1	1	2	0	0	0	0	4
CY 2018	1	4	2	0	0	0	0	7
CY 2019	0	0	0	1	0	1	0	3
CY 2020	0	2	0	0	0	1	0	3
CY 2021	1	1	0	1	0	0	1	4
CY 2022	0	2	1	1	0	0	0	4
CY 2023	0	0	0	1	0	0	0	1
CY 2024*	0	1	0	0	0	1	0	2

\*Through October 2024

Table 9-3 lists total spill volume, volume recovered, and volume reaching surface water for each period. For these metrics, the overall trends are not as clear, primarily because a single spill of high volume will dominate the metric. For instance, the large spill on October 24, 2021 was related to a massive storm that impacted the entire region and exceeded the wastewater treatment plant's capacity. Increased I&I resulting from an unmaintained section of the Highline Canal (SFO responsibility) caused stormwater to flow into collection system manholes, affected the sanitary sewer pump stations and adding enormous flow to the Aviador Area where our overflows occurred.

**Table 9.3: Totals for Sewer Mains  
(Volume Spilled, Portion Contained, and Volume to Surface Waters)**

Period	Total Spill Volume, gallons	Volume Contained and Returned to Sewer, gallons	Volume Entering Surface Water
FY 2009/10	8,328	31	5,650
FY 2010/11	18,002	4	17,150
FY 2011/12	325	90	0
FY 2012/13	16,621	63	16,000
FY 2013/14	115	100	0
FY 2014/15	440	85	300
FY 2015/16	4,138	3,238	900
FY 2016/17	8,975	75	8900
July – Dec 2017	125	125	0
CY 2018	1,135	970	0
CY 2019	1,587	222	1,365
CY 2020	3,955	1,975	0
CY 2021	284,509	25	284,280
CY 2022	12,340	340	12,000
CY 2023	4,500	4,500	0
CY 2024*	939	180	0

\*Through October 2024

### 9.3 SSMP Updates and Modifications

The City will recertify its SSMP at least every six years in accordance with the schedule established by the General Order (i.e., by 8/2/2015), or when substantial changes are made in the SSMP. The City will determine the need to update its SSMP more frequently based on the results of the audits and the performance of its wastewater collection system using the metrics described in this section.

## 10.0 Internal Audits

*The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order.*

*The LRO shall submit an audit Report in CIWQS. The report will be viewable by Water Board staff only. Sewer system operators must be involved in completing the audit, which at a minimum must:*

- Evaluate the implementation and effectiveness of the Enrollee's SSMP in preventing spills;*
- Evaluate the Enrollee's compliance with this General Order;*
- Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and*
- Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.*

*The Enrollee shall submit a complete audit report that includes:*

- Audit findings and recommended corrective actions;*
- A statement that sewer system operators' input on the audit findings has been considered; and*
- A proposed schedule for the Enrollee to address the identified deficiencies.*

The City will audit its implementation and compliance with the provisions of this SSMP in accordance with the schedule established by the General Order (i.e., by 2/2/2025).<sup>4</sup> The audit team will include the Collections Supervisor and Lead Collections Maintenance worker, other City staff (e.g. WPCP Source Control Supervisor for FOG-related sections). The team may also include an outside consultant to assist in coordinating the audit and preparing the audit report. It is also recommended that at the same time the City conduct an review of its spill files to assure that that the files are complete and contain all required records.

A Sewer System Management Plan Audit Report Form was developed to guide the audit process and includes the General Order requirements for each SSMP element. The audit format was adapted from a document developed by the BACWA Collection System subcommittee. The results of the audit, including the identification of any deficiencies and the steps taken or planned to correct them will be included in an Audit Report. Upon completion of the audit, the City will include a copy of the report in **Appendix D**. Modifications and changes to the SSMP are identified and tracked in **Appendix E, SSMP Change Log**.

The audit can contain information about successes in implementing the most recent version of the SSMP and identify revisions that may be needed for a more effective program. Tables and figures or charts can be used to summarize information about these indicators. An explanation of the SSMP development, and accomplishments in improving the sewer system, should be included in the audit, including:

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<sup>4</sup> The Audit Report is due within six months after the end of the required 3-year audit period. The end of the 3-year audit period was 8/2/2024. See [https://www.waterboards.ca.gov/water\\_issues/programs/sso/lookup/](https://www.waterboards.ca.gov/water_issues/programs/sso/lookup/)

- How the sewer system agency implemented SSMP elements during the audit period;
- The effectiveness of implementing SSMP elements;
- A description of the additions and improvements made to the sanitary sewer collection system in the past reporting period; and
- A description of the additions and improvements planned for the upcoming reporting year with an estimated schedule for implementation.

## 11.0 Communication Program

*The Plan must include procedures for the Enrollee to communicate with:*

- *The public for:*
  - o *Spills and discharges resulting in closures of public areas, or that enter a source of drinking water, and*
  - o *The development, implementation, and update of its Plan, including opportunities for public input to Plan implementation and updates.*
- *Owners/operators of systems that connect into the Enrollee's system, including satellite systems, for:*
  - o *System operation, maintenance, and capital improvement-related activities.*

The public is notified of spills and discharges that result in closures of public areas (including streets and surface waters) by erecting cones and barricades, and by posting warning signs in accordance with the Spill Emergency Response Plan. The necessary equipment and signage are kept in the City's emergency response vehicle.

The City's [Water & Sewer Service web page](#) encourages customers who experience problems (e.g., sewage backups) that they suspect is related to the City's mainline system to call the City's Public Works Department, and provides phone numbers for use during business and non-business hours. This page also has a feature ("Millbrae Works") that provides the public with an interactive, map-based means of reporting sewer system (and other) concerns.

The Water & Sewer Service web page and [Chapter 8.20.430 of the City's Municipal Code](#) clearly defines the property owners' responsibilities for the ownership, maintenance and replacement of private lateral. As main lines are televised, if problems are seen in the lateral such as roots and grease, letters are sent to the property owner recommending necessary actions and potential financial assistance may be available to assist with the problem.

Other information provided upon request to interested parties includes: a copy of completed SSMP, brochures and materials regarding collection system operations and maintenance, FOG and contact information and/or opportunities for input into the development and implementation process. The complete SSMP and all references are available at the city webpage.

The city also have brochures and information on collection system programs at various department counters in the city as well as available on the City website.

The [State Water Board's Sanitary Sewer System Spill Reports](#) web page provides a GIS-based application for obtaining information on reported sanitary sewer spills from both public systems and private lateral/private sewer systems. Detailed information on these spills can be accessed through the Interactive Sanitary Sewer System Spill Report feature.

The Collections Division, at least annually, communicates with the City Council at a public meeting that allows for input from the public regarding the implementation and results of the collection system operations.

The city has no satellite systems that discharge to the City's collection system.

Refer to Section 4.6 for information regarding the City's outreach to and requirements for Sewer Service Contractors.

# Appendix A-1

## STANDARD OPERATING PROCEDURES

The City of Millbrae maintains a library of standard operating procedure that is divided into two groups: **Operations Standard Procedures** and **Equipment Standard Operating Procedures**. The titles of these SOPs are listed below, and are incorporated by reference into this SSMP .

### ***Operations Standard Operating Procedures:***

OP-3- Lateral Cleaning.doc  
OP-4- Hand Rodding.doc  
OP-5- Power Rodding.doc  
OP-6-Sewer Lateral Video Inspection.doc  
OP-7- Sewer Main Video Inspection.doc  
OP-8- Pipe Bursting.doc  
OP-14-Pipe Locating-USA Marking.doc  
OP-16- Sewer Callouts.doc  
OP-17- Sewer Main Repairs.doc  
OP-18- Sewer Lateral Repairs.doc  
OP-50-Pumping Utility Vault Lids.doc  
OP-52- USA Ticket Handling.doc  
OP-54-Shoring (Excavating.doc  
OP-56-Confined Space Entry.doc  
OP-57-Maintenance at Madrone Pump Station.pdf  
OP-59-Concrete & Asphalt Cutting.doc

### ***Equipment Standard Operating Procedures:***

EQ-1- Cable Machine.doc

EQ-2- Seeker Lateral Camera.doc

EQ-3- Pathfinder Mainline Camera.doc

EQ-4- H.D.P.E. Fusion Welder.doc

EQ-22- Backhoe.doc

EQ-29 Utility (Pickup Truck.doc

EQ-38- Bobcat Loader.doc

EQ-40- Steel Plates.doc

EQ-42- MSDS.doc

EQ-46- VacConCombination Machine.doc

EQ-47- Pipe Bursting Equipment.doc

EQ-57- Power Rodder.doc

EQ-59- Self Contained Breathing Apparatus.doc



# **Appendix A-2**

## **CITY OF MILLBRAE – CAPITAL IMPROVEMENT PROGRAM**

For FY 2024-2025 to FY 2028-29

# Category Summary 5-Year CIP

FY: 2024-25 to FY 2028-29

## 1 - Sewer System

PROJECT TITLE		2024-25	2025-26	2026-27	2027-28	2028-29	TOTALS
010001-SS2402	Annual Sewer Main Replacement Program	3,250,000					3,250,000
010004-GF2402	Comprehensive Infrastructure Replacement Plan	300,000	9,000,000	9,000,000	9,000,000	9,000,000	36,300,000
010005-SS2407	Hacienda Lift Station Rehabilitation	150,000	850,000				1,000,000
010007-SS2410	Madrone Force Main	200,000	200,000	200,000	200,000	200,000	1,000,000
010008-SS2406	CCTV - Annual Sanitary Sewer Main Cleaning & Inspection	200,000	200,000	200,000	200,000	200,000	1,000,000
010009-SS2408	Hillcrest Subbasin 4 (Lower) Sanitary Sewer Replacement	4,000,000					4,000,000
010010-SS2701	Broadway Sub-Basin 4 Sanitary Sewer Replacement			180,000	2,000,000		2,180,000
010011-SS2601	Murchison Ave Sewer Capacity Upgrade		140,000				140,000
010013-SS2403	Aviador/E. Millbrae Avenue Capacity Upgrade	120,000					120,000
010014-SS2504	Sewer Collection System SCADA Upgrade	1,500,000	1,100,000	1,000,000	200,000		3,800,000
010016-SS2401	Annual Sewer Lateral & Main Replacements Program	700,000	700,000	700,000	700,000	700,000	3,500,000
010017-SS2503	Co-Generation Rehabilitation Project	100,000		1,000,000	1,400,000		2,500,000
010018-SS2802	Digesters Improvements (Chemical Injection System)				1,000,000		1,000,000
010019-SS2409	Hypochlorite System Improvements	50,000					50,000
010020-SS2411	Nearshore Outfall	1,100,000					1,100,000
010021-GRANT2501	Recycled Water Project	800,000					800,000
010022-SS2602	North Bayside System Unit Force Main Inspections & Repairs		150,000	850,000			1,000,000
010023-SS2501	Aeration Tank and Secondary Clarifier Improvements	800,000					800,000
010024-SS2412	Sludge Thickener and Digester #2 Rehabilitation	1,200,000					1,200,000
010025-SS2405	Capital Equipment	100,000	100,000	100,000	100,000	100,000	500,000
010025-SS2801	5-Year Plan for WPCP				500,000		500,000
010026-No #	Richmond Drive/Anita Drive Sewer Capacity Upgrade						
010027-No #	Madrone Pump Station						
		14,570,000	12,440,000	13,230,000	15,300,000	10,200,000	65,740,000

### PROJECT FUNDING SOURCES

101x	General Fund	100,000	3,000,000	3,000,000	3,000,000	3,000,000	12,100,000
104	Grant	800,000					800,000
660x	Sewer	13,570,000	6,340,000	6,730,000	9,100,000	4,200,000	39,940,000
670x	Water	100,000	3,100,000	3,500,000	3,000,000	3,000,000	12,700,000
680x	Storm				200,000		200,000
		14,570,000	12,440,000	13,230,000	15,300,000	10,200,000	65,740,000

# Appendix A-3

## MAJOR SEWER SYSTEM EQUIPMENT INVENTORY

Equipment Number	Major Equipment Type	Year Purchased
712	Ford F250 Pick Up Truck	2015
305	Street Sweeper Freightliner/Tymco	2016
711	Vac-Con Combo Unit Freightliner/Chassis	2014
760	Ford F150	2014
771	Ford F250 Utility	2018
772	Ford Transit Van CUES CCTV Granite Net	2018
778	Ford F150	2023
779	Gapvac Peterbuilt Chassis	2024
330	Ford 650 Dump Truck	2016
332	Ford 650 Dump Truck	2017
470	John Deere 310 SI Backhoe	2018
360	John Deere 310 SI Backhoe	2020
673	Bobcat with Hammer and Backhoe Attachment	2019
377	Wacker Asphalt Roller	2007
710	Sulair Air Compressor	2020
	Bri-Mar Hydraulic Dump Trailer	2005
480	Wacker Light Tower	2002
476	Wacker Light Tower	2002
326m	Addco Battery Powered Message Board	2022
325 A	Wanco Battery Arrow board	2022
324A	Wanco Battery Arrow board	2022
475M	Vermac Message Board	2023
759M	Vermac Message Board	2023
323	Power Washer Hydrotech	1995
	Trick Pipe Bursting Unit	2010
	6" HDPE Fusion Unit	2005
	4" HDPE Fusion Unit	2005

	Wacker Trench Tamper	2000
	Wacker Asphalt Tamper	2006
	Stihl Cut-Off Saw	2005
	Stihl Walk-Behind Saw	2008
	Honda EN500 Generator	2005
	Honda EU1000 Generator 7	2009
	Honda 3500 SX Generator on Trailer	2000
	Spartan Cable Machine X3	2000
	Friat Thermal Coupler Unit	2005
	12' Equipment Trailer	2000
	15' Equipment Trailer	2000
	Bosch Bulldog Small Hammer	2008
	Stihl Chainsaws 12"-30"	2002
	Stihl Pole Saws (2)	2002
	Milwaukee Large SDS hammer Drill	2024
	Milwaukee tracker and locater	2024
	Milwaukee Lateral Camera	2024
	Industrial scientific VLOC 3 Locator	2018

# Appendix A-4

## CRITICAL SEWER SYSTEM REPLACEMENT PARTS INVENTORY

Part Description as of xxx	Number in Inventory	Location
6"x 6"x 6" Clay WYE	4	Aviador
6"x 6"x4 " Clay WYE	5	Aviador
8"x 8"x 4" Clay WYE	3	Aviador
6"x 6" VCP Pipe	1	Aviador
45 HDPE Elbow	17	Aviador
Flexible Thermal Coupler 4"	8	Aviador
4" Thermal Coupler	9	Aviador
6" Thermal Coupler	4	Aviador
4" HDPE Clean Out Adaptor	5	Aviador
6" HDPE Clean Out Adaptor	3	Aviador
6" Clay to Clay Band	11	Aviador
8" Clay to Plastic Band	7	Aviador
4" Clay to Clay Band	7	Aviador
4" 33° HDPE Elbows	22	Aviador
6"x 6"x 6" HDPE WYE	1	Aviador
6"x 6"x 4" HDPE WYE	7	Aviador
4"x 4"x 4" HDPE WYE	1	Aviador
4'x 4' Check Valve	0	Aviador
4" Pop-Up Valve	72	Aviador
6"x 20" HDPE Pipe (Grey)	1	Aviador
12"x12" SDR Pipe	1	Aviador
B9 Concrete Box	2	Aviador
8" Round Concrete Box	3	Aviador
6"x 20" HDPE Pipe (Black)	11	Corp Yard
4"x 20" HDPE Pipe (Black)	11	Corp Yard
4" Corrugated Pipe	200	Aviador
6" Corrugated Pipe	250	Aviador

# **Appendix B-1**

## **SPILL EMERGENCY RESPONSE PLAN (SERP)**

*Note: The SERP was updated in July 2023 by DKF Solutions, Inc. and is incorporated by reference into this SSMP.*

# **Appendix B-2**

## **PUMP STATION Spill Emergency Response Plans**

*Note: The Emergency Response Plans for the Madrone, Hacienda, and Plaza Bay Pump Stations were updated in July 2023 by DKF Solutions, Inc. and are incorporated by reference into this SSMP.*

# **Appendix C**

## **CITY OF MILLBRAE FOG POLICY**





**City of Millbrae**

# **Fats, Oils and Grease (FOG) Policy for Food Service Establishments**

***Final***  
**April 2, 2021**

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## 1.0 INTRODUCTION

The State Water Resources Control Board (SWRCB) Order No. 2006-003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems* includes requirements for a Sanitary Sewer Management Plan (SSMP). The City of Millbrae's (City's) SSMP includes a Fats, Oils and Grease (FOG) Control Program. The FOG Control Program works in conjunction with the City's preventative maintenance program to prevent FOG related Sanitary Sewer Overflows (SSOs). The Water Pollution Control Plant (WPCP) Environmental Service Group is responsible for administering the City's FOG Control Program.

The legal authority to implement, monitor and enforce the elements of the FOG Program in the City's service area is in the City of Millbrae Municipal Code Chapter 8.20 *Municipal Sanitary Sewer* and Chapter 9.25, which adopts the California Plumbing Code.

This Policy serves as a guide to implementing the FOG Control Program and preventative maintenance program with specific direction for the installation and maintenance of grease removal devices (GRD) in food service establishments (FSE).

## 2.0 DEFINITIONS

*Best Management Practices (BMPs)*: Procedures or actions which may eliminate or reduce the amount of pollutants or constituents discharged or eliminate a specific discharge to the sewer system. May include schedule of activities, prohibition of practices, maintenance procedures, other management practices, treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

*Fats, Oils and Grease (FOG)*: means any animal or vegetable-based fats, oils, and grease generated from food preparation, food service, and kitchen cleanup.

*Food Service Establishment (FSE)*: includes, but is not limited to, any facility preparing and/or serving food for commercial use or sale. This includes restaurants, cafes, lunch counters, cafeterias, hotels, hospitals, convalescent homes, factory or school kitchens, catering kitchens, bakeries, grocery stores with food preparation (excluding stores with only food-warming operations), meat cutting and preparation, and other food handling facilities not listed above where fats, oils, and grease may be introduced into the sanitary sewers

*Grease Removal Device (GRD)*: means a device used to remove FOG from kitchen waste discharged to the sanitary sewer, i.e., a grease interceptor, grease trap, or other mechanical device.

*Grease Interceptor (or Interceptor)*: means a GRD consisting of a portioned vault, with a minimum volume of 750 gallons, that is typically installed inground or underground and outside of the building which it serves.

*Grease Trap (or Trap):* means a GRD designed to serve one to four (4) kitchen fixtures. Traps are usually 50 gallons or less in volume and are typically located inside a kitchen, under the sink, or in the floor.

*Major Remodel:* means a remodel which includes significant change to the kitchen and which has a building permit valuation of at least \$100,000, not including the purchase and installation cost of any GRD installed during the remodel.

*New Food Service Establishment:* means a) a new building which will contain a FSE; b) the installation of a FSE in an existing building which has not previously contained a FSE requiring a Plan Check from the City.

*Sewer Line “Hot Spot”:* means a location in the sanitary sewer system where one or more FOG-related sewer overflows have occurred that requires significantly increased maintenance to prevent FOG-related line blockages, and/or where a significant potential exists for FOG-related line blockages to occur. The designation of a “Hot Spot” will be solely at the discretion of the City, based on the history and characteristics of the location.

*Uniform Plumbing Code:* means the “2019 California Plumbing Code” (California Code of Regulations, Title 24, Part 5). If there are future revisions to the UPC that relate to sizing of GRDs, the City reserves the right to use either the present or revised UPC, as appropriate.

*Working Capacity:* means the total volume of solids, water, and grease that a Grease Interceptor or grease trap is designed to contain under normal operating conditions.

## 3.0 PERSONNEL RESPONSIBILITIES

### 3.1 Environmental Compliance Inspector

The Environmental Compliance Inspector (ECI) is responsible for the day-to-day implementation and enforcement of the FOG control program. The ECI’s duties are to:

- Perform inspections and prepare inspection reports.
- Maintain and update the permitted FSE inventory list.
- Manage the FSE permit process (applications, permits, renewals).
- Prepare informal (WN) and formal notices (Late Notices, NOV, fines, etc).
- Inform Laboratory Source Control Supervisor of IU violations,
- Review Planning Department applications for applicable FSEs that must install GRDs and approval of GRD types and sizes.

### 3.2 Laboratory/Source Control Supervisor

The Laboratory/Source Control Supervisor monitors the ECI’s actions and manages the FOG Control Program. The Supervisor’s duties are to:

- Manage activities and enforcement measures of the Environmental Compliance Inspector.
- Review and issue NOVs.

- Review and sign for fines issued.
- Recommend and prepare enforcement actions (AO, SCO, CDO, etc.)
- Review Planning Department applications for applicable FSEs that must install GRDs and approval of GRD types and sizes.

### 3.3 Superintendent of WPCP

The Superintendent has direct responsibility for the FOG Control Program. The Superintendent duties are to:

- Review and sign for fines issued.
- Issue permits and Administrative Order enforcement actions (AO, SCO, CDO, etc.)
- Hear IU appeals.
- Suspend or revoke discharge permits

### 3.4 Director of Public Works

The Director's duties are to:

- Conduct SC hearings for appeals.
- Make final decision of fine for Show Cause hearing.
- Issue order to restrict, suspend or disconnect a user from the City's wastewater collection system.

### 3.5 City Attorney

The City Attorney's duties are to:

- Advise staff during enforcement matters as required
- Manage civil and criminal litigation on behalf of the City

## 4.0 GREASE REMOVAL DEVICE REQUIREMENTS

All new FSEs, all existing FSEs undergoing a Major Remodel and all existing FSEs upstream of a Sewer Line "Hot Spot" shall have at least one GRD, as specified below. See also Table 1.

### 4.1 New Food Service Establishment

A new FSE, as defined in the Definitions section above, is a new building which will contain a FSE or the installation of a FSE in an existing building which has not previously contained a FSE requiring a Plan Check from the City. A business will not be considered a new FSE solely on the basis of a change of menu, name, and/or ownership.

All new FSEs shall install an Interceptor sized in accordance with Appendix H of the Uniform Plumbing Code (UPC). Interpretation of Appendix H and the variables used in the sizing calculation shall be at the discretion of the City. The City will accept interceptor sizing based on Appendix H updated by the International Association of Plumbing and Mechanical Officials (IAPMO) although changes may not be in the UPC currently codified by the City.

The interceptor shall drain all fixtures and equipment in the establishment which may receive FOG, including but not limited to utensil sinks, food preparation sinks, hand washing sinks in kitchen areas, mop sinks, and floor drains and floor sinks in kitchen and washing areas. The dishwashing machine shall be plumbed to the interceptor, unless specified otherwise by the City. Any discharge to the sanitary sewer from routine cleaning of exhaust hoods and ducts shall be plumbed to the interceptor. No drains from toilets, showers, or other domestic discharges shall be connected to the interceptor.

If there is an outside refuse area and/or washing area plumbed to the sanitary sewer it must drain to the kitchen interceptor or to another properly sized interceptor. Note any proposed outside refuse area and/or washing area plumbed to the sanitary sewer should also be covered and bermed to prevent discharge to storm drainage.

#### 4.2 Major Remodel

Any FSE which is: a) upstream of a Sewer Line “Hot Spot,” as defined above; and b) undergoing a Major Remodel, as defined above, shall install an interceptor. The requirements shall be the same as for a new FSE, except for the following:

1. A remodeled FSE may be allowed to not connect some minor kitchen drains, such as hand washing sinks or floor drains, where connection of these drains to the interceptor would require excessive replumbing. The determination shall be solely at the discretion of the City, on a case-by case-basis. For any drain exempted from connection to the interceptor, the FSE shall maintain employee training and/or signage to prevent discharge of FOG to the drain.
2. Any FSE which is not upstream of a Sewer Line “Hot Spot” but is undergoing a Major Remodel, as defined above, shall install, at a minimum, one or more grease traps, as required for an existing FSE which is upstream of a “Hot Spot”.

#### 4.3 Existing Food Service Establishments Upstream of Sewer Line “Hot Spot”

The City will maintain a current list of the locations designated as “Hot Spots”. The list will reference the evidence supporting each designation. Such evidence may include, but is not limited to, maintenance records, SSO reports, or videotapes. The designation of a “Hot Spot” shall be solely at the discretion of the City. The minimum GRD requirement for any FSE above (upstream) a designated “Hot Spot” shall be one or more traps draining at least the utensil sinks and dishwasher prerinse sink (scrap sink). The sizing of the trap(s) shall be as follows:

1. For FSEs that do not currently have any GRD in place, the installed trap(s) shall be sized in accordance with Table 102 in Chapter 10 of the UPC, or subsequent revisions, at the discretion of the City. Manufacturer specifications may be used instead of the UPC table, if adequate documentation is provided to assure the City that the trap size is appropriate for the fixtures drained.
2. Existing FSEs with one or more traps currently installed shall not be required to install a larger trap if the size of the trap is at least 70% of the size specified by Table 102 in

Chapter 10 of the UPC. Those FSEs with installed traps sized at less than 70% of the UPC requirement shall be required to install larger or additional traps to meet the appropriate sizing requirement of the UPC.

3. The City reserves the right to require installation of an interceptor if such installation is appropriate due to the size, menu, and location of the FSE.

FSEs upstream of a designated “Hot Spot”, that have a grease trap meeting the requirements in this Section, will be issued a wastewater discharge permit. The permit shall authorize the FSE to discharge from their kitchen drains without installation of an interceptor. However, if the City determines that the FSE's grease trap(s) and operating practices are inadequate and the FSE continues to contribute significant quantities of FOG to a downstream Sewer Line “Hot Spot,” the permit can be revoked and the FSE shall be required to install an interceptor. If the permit is revoked, the FSE shall be subject to the same requirements as described above in Section 4.2 for a FSE upstream of a “Hot Spot” and undergoing a Major Remodel. Such revocation will only occur after the City has worked with the permittee to resolve the problem and has documented reasonable evidence that FOG discharges from the FSE are contributing to the “Hot Spot” problem

#### 4.4 Grease Traps

All grease trap installations (existing traps or new installations) shall comply with all of the following requirements (note that these requirements do not apply to interceptor installations):

- Dishwashing machines shall not drain to a Grease Trap, unless the FSE can document that the volume and temperature of wash water and rinse water discharged, in combination with any detergent, soap, and/or disinfectant in the water, will not render the Trap ineffective.
- All new or existing Grease Trap installations shall comply with 1014.3 of the UPC. This requires a flow control device, meeting certain criteria, to be installed either on each fixture drain before the trap inlet or at the trap inlet itself.
- For any kitchen drain not connected to the Grease Trap, the FSE shall maintain employee training and/or signage adequate to prevent discharge of FOG to the drain.
- Installation of specialized grease removal devices of proprietary design, such as the Big Dipper, will be considered by the City on a case-by- case basis. Approval will be contingent on demonstration that the device will reliably perform at least as well as a conventional Grease Trap meeting the requirements of the UPC.

#### 4.5 Existing Food Service Establishments Not Upstream of “Hot Spot”

Existing FSEs that are not upstream of a Sewer Line “Hot Spot” do not have permit or GRD requirements. However, owners and operators of such establishments should consider that if the FSE discharges sufficient amounts of FOG to cause an obstruction in the sanitary sewer, they would be in violation of City Municipal Code Section 8.20.290(D)(11) and 8.20.485. Such

discharge would also be likely to plug the FSE's drain lines, causing sewage back-ups into the kitchen.

Upon request, City personnel will provide FSEs with information regarding employee training and GRDs to minimize FOG discharge to the sewer.

**Table 1. Grease Removal Device (GRD) Installation Requirements**

<b>FSE Type</b>	<b>Grease Removal Device Requirements</b>
New FSE	Interceptor
Major Remodel upstream of a "Hot Spot"	Interceptor
Major Remodel not upstream of a "Hot Spot"	Grease Traps
Existing FSE upstream of a "Hot Spot"	Grease Traps (draining at least the utensil sinks and dishwasher prerinse sink) OR Interceptor if deemed appropriate by City
Existing FSE not upstream of a "Hot Spot"	No requirement

## 5.0 REQUIREMENTS FOR FSEs SUBJECT TO THIS POLICY

All new FSEs, Major Remodels, and all existing FSEs upstream of a Sewer Line "Hot Spot" are subject to this Policy and will have a wastewater discharge permit issued by the City and at least one grease removal device (GRD), as described in this Policy. The sole exception is any FSE granted a permit waiver, as discussed in Section 5.1 below. All FSEs that are subject to this Policy must comply with the requirements of Sections 5.2 through 5.5 below, unless granted a permit waiver.

### 5.1 Permit Waiver

All FSEs must have a current wastewater permit issued by the City, unless the City grants a permit waiver. Waivers will be granted only to those FSEs that can demonstrate to the satisfaction of the City that they are not a significant source of FOG. This will normally be the case only if there is no cooking or cleanup taking place at the facility.

### 5.2 Grease Recycling Bin

All FSEs shall have a bin or drum for collecting waste kitchen grease and used cooking oil. FOG cleaned out of grease traps shall not be placed in this container, as it is more difficult to recycle. The container shall be used and maintained adequately to prevent spillage or leakage.

The container shall be serviced (emptied or exchanged) and recycled in a legal manner at an appropriate frequency. Receipts or other documentation of such service shall be retained at the FSE and presented to City staff on request. The FSE shall maintain adequate employee training and/or kitchen signage to assure that the container is used and maintained in an appropriate manner.



### 5.3 No Stormwater Pollution

All FSEs shall operate so as to prevent any discharge of FOG or other wastes to storm water drainage in violation of City Municipal Code Chapter 8.70 *Storm Water Management and Discharge Control*. Serious or repeated discharges to storm drainage from an FSE will be referred to the appropriate City staff for enforcement action.

### 5.4 GRD Additives Prohibited

Addition of enzymes, solvents, or emulsifiers to GRDs (grease Traps or Interceptors) or to drains leading to these devices is prohibited

### 5.5 Food Grinders Prohibited

A food grinder (garbage disposal) shall not discharge to a GRD (Grease Trap or Grease Interceptor).

## 6.0 MAINTENANCE REQUIREMENTS FOR GRDs

The wastewater permit issued to an FSE will specify the required minimum frequency for maintaining (pumping or hand cleaning) the GRD(s) and how the FSE will verify this maintenance.

Regardless of the frequency of maintenance, any GRD with a combined level of floating FOG and settled solids in any compartment which exceeds 25% of the liquid depth of that compartment will be considered to be in violation.

All vents, baffles, inlet and outlet devices, and flow control devices necessary for proper operation of the GRD must be in place and in working condition at all times.

All GRDs shall be completely cleaned out and left empty by a registered transporter of inedible kitchen grease, as described in 6.1, prior to the closure of a FSE, the associated building or a change in ownership. In the event the tenant cannot be located the building owner shall assume responsibility for cleaning the GCDs.

### 6.1 Grease Interceptors and Large Grease Traps

For an FSE with a Grease Interceptor or a Grease Trap larger than 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity), the Interceptor or Trap shall be pumped (i.e., all compartments pumped empty) and the contents legally disposed at a minimum frequency of once every three months. The City may require more frequent pumping if inspections by City staff indicate that pumping every three months is not adequate. At the discretion of the City, the required frequency may be reduced if the FSE provides documentation (e.g., hauler certifications) adequate to establish that less frequent pumping would suffice. Such documentation shall be based on a minimum of one year of quarterly pumping and will be verified by City inspections.

All pumping shall be performed by persons who are certified by the California Department of Food and Agriculture (DFA) as a registered transporter of inedible kitchen grease. The pumper

shall transport the pumped waste to an authorized receiving facility, as defined by the DFA. DFA regulations require the pumper to provide the FSE with a waste removal receipt which includes the name of the FSE, the date of the pumping, the working capacity of the Interceptor pumped (see Section 2.0 Definitions) and the total gallons pumped.

## 6.2 Grease Traps

FSEs with a grease trap of 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity) or less may choose to comply with the procedure specified in Section 6.1 above, except that the minimum pumping frequency shall be monthly, unless modified in the permit, as described above.

All FSEs with a grease trap of 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity) or less who do not choose to comply with the above shall comply with the procedure specified below:

- The Grease Trap shall be cleaned by FSE staff and/or a contractor, at a minimum frequency of once every 15 days. The City may require more frequent cleaning if inspections by City staff indicate that cleaning every 15 days is not adequate. At the discretion of the City, the required frequency may be reduced if the FSE provides documentation (e.g., logbook observations) adequate to establish that less frequent cleaning would suffice. Such documentation shall be based on a minimum of six months cleaning at a minimum 15-day frequency and will be verified by City inspections.
- Persons cleaning a Trap shall assure that all grease and sediment is removed and appropriately disposed. They shall also assure that all baffles, flow control devices, and other equipment are properly installed subsequent to the cleaning. All wastes removed from the Trap during cleaning shall be placed in a drum or other dedicated container and be removed by a registered transporter of inedible kitchen grease, as described in Section 6.1 above. The trap waste may not be placed in the grease recycling bin specified in Section 5.2, unless the grease hauler provides written certification that this is acceptable and the hauler complies with all DFA regulations for inedible kitchen grease.
- Cleaning of a Trap shall be documented on a log sheet maintained by the FSE. The log sheet shall include, at a minimum, the date of the cleaning event, the name of the person(s) performing the cleaning, their signature, the quantity of waste removed from the Trap, and any other relevant observations. The completed log sheets shall be maintained onsite for a minimum of three years and provided to City staff on request. The FSE shall provide to the City a copy of their current log sheet at a frequency specified by the FSE permit.

**Table 2. Grease Removal Device (GRD) Maintenance Requirements**

GRD Type and Size	Frequency	Pumping Requirements
Interceptor or Grease Trap > 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity)	Once every 3 months <sup>1</sup> (i.e. quarterly)	DFA registered transporter
Grease Trap ≤ 30 gallons liquid capacity (35 gpm rating / 70 pound grease storage capacity)	Monthly <sup>1</sup>	DFA registered transporter
	Once every 15 days <sup>1</sup>	FSE staff/contractor
Any GRD with combined level of floating FOG and settle solids in any compartment > 25% liquid depth of that compartment	Immediate cleaning required	

Notes:

<sup>1</sup> Or as determined by City

# **Appendix D**

## **SSMP AUDIT REPORT**

**City of Millbrae - SSMP Audit Checklist**  
**Audit Date: February 17, 2023**

The purpose of the SSMP Audit is to evaluate the effectiveness of the City of Millbrae SSMP and to identify any needed for improvement.				
Directions: Check YES or NO for each question. If NO is answered for any question, describe the updates/changes needed and the timeline to complete those changes. Include discussion for YES responses as appropriate.				
<b>INTRODUCTION</b>			YES	NO
A.	Is information in the SMMP Introduction current?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Discussion &amp; Actions:</b> The description of collection system, collection system map, and definitions are current. Tables Intro-1 through Intro-3 (Line Size Distribution, Materials of Construction, and Pipe Age) were current as of the last SSMP update but need some updating to reflect the most recent capital improvement projects. The Introduction's description of the Consent Decree is historically accurate; however it should be noted that the decree has terminated. For the next SSMP revision, review the reissued General Order for Sanitary Sewer System WQO 2022-0103-DWQ (General Order) for any additional requirements that apply to the Introductory section. The reissued General Order becomes effective on 6/5/2023.				

<b>ELEMENT I - GOALS</b>			
A.	Are the goals stated in the SSMP still appropriate and accurate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Actions:</b> For next update, specific wording from the General Order regarding goals could be incorporated.			

<b>ELEMENT II - ORGANIZATION</b>			
A.	Is the List of City Staff Responsible for SSMP current?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B.	Is the Sanitary Sewer Overflow Responder List current?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C.	Is Figure II-1 of the SSMP, the City Organization Chart, current?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D.	Are the position descriptions an accurate portrayal of staff responsibilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E.	Is Table II-2 in the Chain of Communication for Reporting and Responding to SSOs section accurate and up-to-date?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Discussion:</b> The Public Works <u>positions</u> described as being responsible for SSMP implementation and maintenance, chain-of-command, responding to service calls, and reporting are accurate (with minor exceptions-see below) but some of the individuals occupying those positions have changed. The same applies to the Collection Systems Organization Chart. The position "Superintendent Utilities and Operations" is now "Public Works Deputy Director". The "Collections and Storm Operations Supervisor" is also responsible for Streets. <b>Actions:</b> For the next SSMP revision, update Tables II-1, II-2 with current individuals; update LRO listing. On Figure II-2 flow chart, show that OES notifies the RWQCB rather than City staff.			

<b>ELEMENT III – LEGAL AUTHORITY</b>			
Does the SSMP contain current references to the City of Millbrae Municipal Code documenting the City’s legal authority to:			
A.	Prevent illicit discharges?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Require proper design and construction of sewers and connections	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C.	Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the City?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D.	Limit discharges of fats, oils and grease?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E.	Enforce any violation of its sewer ordinances?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F.	Were any changes or modifications made in the past year to City Sewer Ordinances, Regulations or standards?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Discussion:</b> The City’s FOG Policy expands upon Municipal Code requirements related to installation and maintenance of Interceptors and Grease Removal Devices.			

<b>ELEMENT IV – OPERATIONS AND MAINTENANCE</b>			
<b>Collection System Maps</b>			
A.	Does the SSMP reference the current process and procedures for maintaining the City’s wastewater collection system maps?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Are the City’s wastewater collection system maps complete, current and sufficiently detailed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C.	Are storm drainage facilities identified on the collection system maps? If not, are SSO responders able to determine locations of storm drainage inlets and pipes for possible discharge to waters of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Prioritized Preventative Maintenance</b>			
D.	Does the SSMP describe current preventive maintenance activities and the system for prioritizing the cleaning of sewers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E.	Based upon information in the Annual SSO Report, are the City’s preventive maintenance activities sufficient and effective in minimizing SSOs and blockages?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Scheduled Inspections and Condition Assessments</b>			
F.	Is there an ongoing condition assessment program sufficient to develop a capital improvement plan addressing the proper management and protection of infrastructure assets? Are the current components of this program documented in the SSMP?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Contingency Equipment and Replacement Inventory</b>			
G.	Does the SSMP list the major equipment currently used in the operation and maintenance of the collection system and documents the procedures of inventory management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
H.	Are contingency and replacement parts sufficient to respond to emergencies and properly conduct regular maintenance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Training</b>			
I.	Does the SSMP document current training expectations and programs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Outreach to Plumbers and Building Contractors</b>			
J.	Does the SSMP document current outreach efforts to plumbers and building contractors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

***Discussion:***

*Maps:* The Storm Drain maps are separate from the Sanitary Sewers maps. Streets, sanitary sewers and storm sewers are all managed by the Public Works Department Utilities and Operations group, so the Collections crew are very familiar with and have ready access to both map sets.

*Scheduled Inspections and Condition Assessments:* Results of CCTV are the primary basis for prioritizing CIP repair/replacement projects, with age of pipelines, observations during cleaning, and occurrences of SSOs also informing CIP decisions.

***Actions:***

*Prioritized Preventative Maintenance:* The SSMP's statement that the entire system is cleaned annually should be rephased to be a goal. HDPE lines, many of which were recently installed, are much less prone to root intrusion and other problems and do not require such frequent cleaning. These lines are on a 5-yr cleaning cycle.

For the next SSMP revision, consider deleting Figure IV-1 (Organization Chart) since it is the same as Figure II-1. Correct link to Figure IV-1 on p. 28. Review and update Tables IV-1 and IV-2 (Cleaning Footages) with most recent data, available from the City's AIMS CMSS. Also, consider removing the discussion in Section 4.2.1.1 of Consent Decree requirements, as the decree is no longer in effect and most of these actions are routine elements of the City's program and recordkeeping.

The discussion regarding future use of Root Foaming (Section IV-2.1.3) is no longer accurate, as the City decided to not utilize root foaming based on impacts to the treatment plant. The City's preference for addressing root problems is to repair or replace the line, or at a minimum, accelerate its cleaning cycle.

Update status of Contingency Plans (EORPs) for individual pump stations. Per City staff, these were completed in 2015.

In the paragraph following Table IV-2, remove discussion of specific SSOs in 2016 and 2017 and replace with summary of overall trends. Reference charts in Section IV

*Training:* For the next SSMP revision, retain narrative and schedule of training activities, but identify them as typical rather than referring to a particular year.

**ELEMENT V- DESIGN AND PERFORMANCE STANDARDS**

A.	Does the SSMP reference current design and construction standards for the installation for new sanitary sewer systems, Pump stations and other appurtenances and for the rehabilitation and repair of existing sanitary sewer systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Does the SSMP document current procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and the rehabilitation and repair of existing sewer lines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>



<b>ELEMENT VI – OVERFLOW AND EMERGENCY RESPONSE PLAN</b>			
A.	Does the City’s Sanitary Sewer Overflow Emergency Response Plan establish procedures for the emergency response, notification, and reporting of SSOs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Is City staff and contractor personnel appropriately trained on the procedures of the Sanitary Sewer Overflow Emergency Response Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C.	Considering SSO performance data, is the Sanitary Sewer Overflow Emergency Response Plan effective in handling SSOs in order to safeguard public health and the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D.	Are all SSO and claims reporting forms current or do they require revisions or additions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E.	Does all SSO event recordkeeping meet the SSS GWDR requirements? Are all SSO event files complete and certified in the CIWQS system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F.	Is all information in the CIWQS system current and correct? Have periodic reviews of the data been made during the year to assure compliance with GWDR? Have all Technical Report and Water Quality Sampling requirements been confirmed and uploaded to the CIWQS data management system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
G.	Was required training on SSMP and OERP completed and documented? Were field exercises with field staff on SSO volume estimation conducted and documented?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
H.	Did all public improvement plans and specifications that could impact collection system operations include requirements for OERP training or were contractor OERP programs at least as stringent as the City OERP? Were regular items included in project meeting agendas to discuss emergency response procedures and communications?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Discussion:</b> The City’s EORP is currently being updated by DKF Solutions and will include changes/updates that reflect the reissued General Order. DKF will review (and if necessary update) the SSO claims reporting forms. DKF will also provide training on the new Plan. Note: The EORP will be renamed “Spill Emergency Response Plan” (SERP) to conform with the language used in the Order.</p> <p><b>Actions:</b> The four subsections under SSMP Section VI-7 will require minor updating to conform with the reissued General Order. Under the new Order, a separate Monitoring Plan will be optional, as monitoring requirements must be incorporated into the SERP. Revise Table VI-1 (Private Lateral Spill) to eliminate statement regarding the need to notify RWQCB.</p>			

**Actions, continued:** Revise Section VI-10 (Post-SSO Debriefing) to reflect current practice. Debriefing discussions may occur but may not be documented in the SSO event file. Also clarify that the Failure Analysis Investigation (Section VI-11) is not applicable to all SSOs.

#### ELEMENT VII – FATS, OILS AND GREASE (FOG) CONTROL PROGRAM

A.	Does the FOG Control Program include efforts to educate the public on proper handling and disposal of FOG?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Does the FOG Control Program identify sections of the collection system subject to FOG blockages, establish a cleaning schedule and address source control measures to minimize these blockages?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C.	Are requirements for grease removal devices, best management practices (BMP), record keeping and reporting established in the City's FOG Control Program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D.	Does the City have sufficient legal authority to implement and enforce the FOG Control Program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E.	Is the current FOG program effective in minimizing blockages of sewer lines resulting from discharges of FOG to the system	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:** The City' FOG Program includes Public Outreach & Education, regular cleaning of sewer lines, and specific requirements for installation and maintenance of grease interceptors or other grease removal devices at facility that generate FOG. The Program, implemented through the City's Pretreatment Program, has been effective in minimizing blockages and SSOs related to FOG. Over the three-year period from 2000-2022, there was only one very small (20 gallon) Category 3 SSO that originated from a lower lateral.

FOG-related public outreach materials are posted on the City's web site at <https://www.ci.millbrae.ca.us/departments-services/public-works/water-pollution-control-plant/pollution-prevention-program/pretreatment-program>

The City's FOG Policy supplements Municipal Code FOG provisions by providing additional details on interceptor and grease trap installation requirements. It also spells out internal (City staff) responsibilities for implementation of the policy.

**Actions:** The FOG Policy was adopted subsequent to the last SSMP update, and therefore needs to be included by reference in Section VII of the SSMP.

The listing of annual FOG-related SSOs in Table VII-1 should be updated.

Section VII-3 can be condensed, since each of the General Order's requirements are already listed at the beginning of the Section. Condense each requirement down to a key phrase (e.g., "Public Outreach") rather than restating the full text of the General Order.

<b>ELEMENT VIII- SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN</b>			
A.	Does the Wet Weather Alternatives Analysis Report evaluate hydraulic deficiencies in the system, establish sufficient design criteria and recommend both short and long term capacity enhancement and improvement projects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Does the City's Capital Improvement Plan (CIP) establish a schedule of approximate completion dates for both short and long-term improvements and is the schedule reviewed and updated to reflect current budgetary capabilities and activity accomplishment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Discussion:</b> A number of the remaining capacity improvement projects are scheduled for construction over the 2023 – 2027 period. The City's 5-year CIP budget allocates ~\$15 M for these and other defined collection system projects, \$3.1 M for (primarily) sewer lateral replacement projects, and another \$5 M for design and construction of main replacement projects not specifically defined at this point.</p> <p><b>Actions:</b> Update discussion of capacity-related projects identified in the Wet Weather Alternatives Analysis Report, and of other Collection System CIP projects.</p>			

<b>ELEMENT IX- MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS</b>			
A.	Does the SSMP accurately portray the methods of tracking and reporting selected performance indicators?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Is the City able to sufficiently evaluate the effectiveness of the SSMP elements based on relevant information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C.	Were the consent decree performance metrics met?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Discussion:</b> The SSMP contains a list of Performance Measures that will be tracked. All of the measures related to SSOs are tracked in tables and charts in Section IX of the SSMP. Annual cleaning and CCTV footages, and "Hot Spot" cleaning frequencies are tracked in Section IV. All of these tables and charts should be updated with data from recent years.</p> <p>The Consent Decree actions and performance measures were largely met, except the annual total number of SSO did not hit the target of a maximum of 3 SSOs per 100 miles by 2016, which translates to 2.3 SSOs/yr for the 77 mile system. The City had a total of 11 SSOs over the three-year period of 2020-2022, corresponding to a rate of 3.7/100 miles. Four of these were very low volume and would be considered Category 4 under the new WDR. The two Category 1 SSOs occurred during extreme weather events that resulting in widespread flooding in the Bay Area. Despite not meeting the target value, the rate of SSOs has decline dramatically since the years preceding the Consent Decree.</p>			

<b>ELEMENT X – SSMP PROGRAM AUDITS</b>			
A	Will the SSMP Audit be completed, reviewed and filed in App.A?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Has the SSMP been updated and re-certified at least every five years.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Actions:</b> Section X-2 should be revised to indicate that minor updates to the SSMP may be made without recertification by the City Council.</p>			

<b>ELEMENT XI – COMMUNICATION PROGRAM</b>			
A.	Does the City effectively communicate with the public and other agencies about the implementation of the SSMP and continue to address any feedback?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B.	Did the City Council receive and review an Annual Sewer System Report? Was the annual report uploaded to the City Sewer Section website and added to Appendix A?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Discussion:</i> The SSMP is posted on the City’s web site. The Regional Water Board discontinued the requirement for annual reports in 2012. Annual reports prepared under the Consent Decree were discontinued with the expiration of the decree in 2016. The City annually updates the Collection System Questionnaire in CIWQS as required under the current General Order, and will prepare and submit an Annual Report as required under the reissued General Order.</p>			

<b>GENERAL DISCUSSION / RECOMMENDATIONS</b>	
<ul style="list-style-type: none"> <li>• The SSMP will require some updating to conform with the reissued General Order. The City currently plans to do such updating in advance of the August 2025 due date. The EORP (Spill Response Plan) is currently being updated and that update will reflect new provisions and requirements related to emergency response.</li> <li>• Key Definitions in the reissued General Order could be added to the SSMP’s existing Definitions section (Introduction). Also add definition of Category 4 spill.</li> <li>• Where possible, provide links to key reference documents referred to in the various section. “Core” documents such as the SERP need to be incorporated into the electronic SSMP file or available through links.</li> </ul>	

<b>Change Log</b>			
A.	Is the SSMP Change Log, current and up to date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><i>Discussion:</i> The change log reflects changes made for the August 2018 update. Earlier changes are not shown on that log but may be available.</p>			

Audit Team:

Audit Date: 2/17/2023

Ray Goebel, EOA, Inc. (All sections)

Mike Killigrew, Collections Supervisor (All sections)

Criss Junio, Lead Collection System Maintenance Worker (All sections)

Kevin Cesar, Lab/Source Control Supervisor (Introduction, FOG Sections)

Craig Centis, Public Works Deputy Director (Introduction, FOG Sections)

Audit Document Prepared by:

Ray Goebel, EOA, Inc

Reviewed by:

Mike Killigrew, Collections Supervisor

Review Completion Date 4/13/2023

# **Appendix E**

## **LOG OF SSMP CHANGES**

<b>Date</b>	<b>SSMP Element</b>	<b>Description of Change/Revision Made</b>	<b>Person Authorizing Change</b>
8/1/2018	Introduction	Intro Table 1 and 3 revised.	Jane Kao
8/1/2018	II	Figure II-1, Table II-1, and Table II-2 revised	Jane Kao
8/1/2018	IV	Figure IV - 1, Table IV-1, Table IV-2, Table IV-3 (and narratives), Table IV-4, IV-2.1.3 Root Foaming, IV-2.5 Training, and Appendix IV-B revised	Jane Kao
8/1/2018	VII	Table VII-1 revised	Jane Kao
8/1/2018	IX	Table IX - 1, Figure IX - 1, Figure IX - 2, Table IX - 2, Figure IX - 3, Table IX - 3, and Figure IX - 4 revised	Jane Kao
8/1/2018	X	2018 Audit Added	Jane Kao
Nov. 2024	All	The entire SSMP was updated to conform with the requirements of the re-issued General Order, including both format and content. Hyperlinks to external content were added. Removed references to former Baykeeper consent decree. Appendices were moved from individual sections to end of document. Additional changes are described below. Section number citations below refer to current numbering scheme	Chris Julio
Nov. 2024	Section 1	Introduction incorporated into Section 1. Added SSMP Plan Update Schedule, additional definitions. Updated Tables 1.1, 1.2, 1.3.	Chris Julio
Nov. 2024	Section 2	Updated LRO info, Table 2.1,	Chris Julio
Nov. 2024	Section 3	Updated Table 3.1 (added additional citations)	Chris Julio
Nov. 2024	Section 4	Deleted redundant Org chart, system map. Updated Tables 4.1, 4.2, 4.3 Deleted description of root foaming (no longer used)	Chris Julio
Nov. 2024	Section 5	Deleted detailed listings of City Standard drawings (replaced with link to Public Works web site)	Chris Julio
Nov. 2024	Section 6	Updated to reflect specific requirements of General Order and revisions to SERP, e.g. updated description of water quality monitoring, updated Table 6.1 (Notification & Reporting requirements), discussion of annual reporting, coordination with agencies.	Chris Julio
Nov. 2024	Section 7	Now titled “Blockage Control Program”. Updated description of FOG Program and Policy	Chris Julio
Nov. 2024	Section 8	New text to conform with General Order requirements. Update on CIP activities. Added discussion of system resiliency issues and links to external information	Chris Julio
Nov. 2024	Section 9	Updated performance metrics (Tables 9.1, 9.2, 9.3). Deleted charts.	Chris Julio
Nov. 2024	Section 10	Updated discussion of audit and SSMP update requirements. Removed audit template (current audit is in Appendix D)	Chris Julio
Nov. 2024	Section 11	Updated discussion and provided links to external web sites	Chris Julio
Nov. 2024	Appendix A-2	Updated CIP Budgets	Chris Julio
Nov. 2024	Appendix A-3	Updated Equipment Inventory	Chris Julio
Nov. 2024	Appendix A-4	Updated Replacement Parts Inventory	Chris Julio
Nov. 2024	Appendix B-1	Updated Spill Emergency Response Plan (SERP)	Chris Julio
Nov. 2024	Appendix B-2	Added Pump Station Emergency Response Plans (by ref.)	Chris Julio

Nov. 2024	Appendix C	Added new FOG policy	Chris Julio
Nov. 2024	Appendix D	Added current (Feb 2023) Audit Report	Chris Julio
Nov. 2024	Appendix E	Updated Log of SSMP changes	Chris Julio



# **Appendix F**

## **SSMP COUNCIL ADOPTION DOCUMENTS**

**RESOLUTION 21-89**

**CITY OF MILLBRAE, COUNTY OF SAN MATEO  
STATE OF CALIFORNIA**

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**RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MILLBRAE APPROVING  
THE REVISED SEWER SYSTEM MANAGEMENT PLAN**

**WHEREAS**, on May 2, 2006, pursuant to its authority under California Water Code Section 13263, the State Water Resource Control Board (SWRCB) adopted the Statewide General Waste Discharge Requirements (WDR) to regulate sanitary sewer wastewater collection systems; and

**WHEREAS**, the WDR applies to all public collection system agencies in California that own or operate collection systems with more than one mile of sewer lines that convey untreated wastewater to a publicly owned treatment facility; and

**WHEREAS**, the WDR requires each agency to prepare, certify, adopt and implement a Sewer System Management Plan (SSMP) and review and revise the SSMP at least every five years or earlier when significant changes are made to the SSMP; and

**WHEREAS**, the SSMP describes the activities the City uses to manage its sanitary sewer collection system effectively and to reduce sewer overflows and sets forth a formalized asset rehabilitation, operation, and maintenance program for the City collection system; and

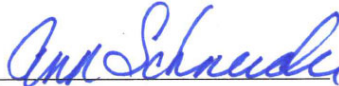
**WHEREAS**, on June 14, 2016, City Council adopted Resolution 16-16 approving the 2016 SSMP; and

**WHEREAS**, in 2018, staff audited the 2016 SSMP and made necessary updates; and

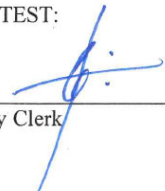
**WHEREAS**, the 2018 updated SSMP needs to be certified by the City Council.

**NOW, THEREFORE BE IT RESOLVED THAT THE CITY COUNCIL OF THE CITY OF MILLBRAE** adopts a resolution approving the 2018 Revised Sewer System Management Plan.

**REGULARLY PASSED AND ADOPTED** this 8<sup>th</sup> day of December, 2021.


  
Mayor

ATTEST:

  
Acting City Clerk 12-17-2021

I do hereby certify that the foregoing Resolution was duly and regularly passed and adopted by the City Council of the City of Millbrae this 8<sup>th</sup> day of December 2021, by the following vote:

AYES:	COUNCILMEMBERS:	Schneider, Oliva, Papan, Fung, and Holober
NOES:	COUNCILMEMBERS:	None
ABSENT:	COUNCILMEMBERS:	None
ABSTAIN:	COUNCILMEMBERS:	None
EXCUSED:	COUNCILMEMBERS:	None

*Acing*  12-17-2021  
CITY CLERK