

City of Los Angeles
Sewer System Management Plan (SSMP)

Attachment G1

**Referral and Enforcement Response Procedures
for FOG Discharges Resulting in a Sanitary Sewer Overflow**

STANDARD OPERATING PROCEDURES SANITARY SEWER OVERFLOWS

SSO Response Procedures

City of Los Angeles / IWMD

SOP-004

REFERRAL AND ENFORCEMENT RESPONSE PROCEDURES FOR FATS, OILS AND GREASE DISCHARGES RESULTING IN AN SANITARY SEWER OVERFLOW

The following are the standard operating procedures for FOG Inspection and Engineer staff that receive and respond to FOG related Sanitary Sewer Overflows (SSOs).

1. SOP For Chief Industrial Waste Inspector I (Chief IWI I)

- 1.1 The Chief IWI I, is the lead person for the response team and serves as the contact person for Wastewater Collection System Division (WCSD).
- 1.2 The Chief IWI I reviews and tracks incoming referral (s) from WCSD.
- 1.3 The Chief IWI will forward incoming SSO referrals to the Senior Industrial Waste Inspector SSO Coordinator and the Sanitary Engineering Associate II Closed Circuit Television Video (CCTV) Analyst for appropriate action.
- 1.4 The Chief IWI I will review the final summary investigation report and prepare an "Oil and Grease Summary Report" from Industrial Waste Management Division's (IWMD) Assistant Division Manager to WCSD's Manager III. The summary page shall contain the following information for ongoing investigations:
 - Number of referrals that require further action
 - Number of investigations in progress from last period that are completed in the current reporting period
 - Follow-up investigations completed
 - Follow-up investigations in progress
 - Referrals with insufficient information or inaccurate addresses from WCSD
- 1.5 The subsequent pages of the report shall contain the following:
 - Date IWMD received the referral
 - Date of the incident
 - Area type (residential, industrial, mixed)
 - Location
 - District
 - Inspector's name
 - Investigation date
 - Inspector's investigation summary
 - Date response to WCSD

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- Follow-up action if needed

1.6. The Chief IW I will review and analyze the SSO Summary Report (Quarterly Report) from WCSD and forward a copy of the report to the Sanitary Engineering Associate II CCTV Analyst for his/her review and analysis.

2. **SOP For Senior Industrial Waste Inspector SSO Coordinator** (Senior IW Coordinator)

2.1 The Senior IW Coordinator oversees the investigation activities for FOG related SSO referrals.

2.2 The Senior IW Coordinator will keep a copy of the SSO referral (s) and enter the data into the appropriate database.

2.3 The Senior IW Coordinator will forward a copy of the SSO referral (s) and a copy of the Sanitary Engineering Associate II's assessment as to the source/cause of the blockage to the FOG Industrial Waste Inspector for investigation.

2.4 The Senior IW Coordinator will follow up on the status of investigation reports that have not been submitted by the end of the third day in which it was assigned to the FOG inspector.

2.5 The Senior IW Coordinator will refer all SSO investigations that resulted in a Notice of Violation (NOV), to the FOG's Enforcement Section for further enforcement action.

2.6 The Senior IW Coordinator will prepare a report that summarizes the results of each SSO investigation and submit the report to the Chief IW I for his/her review. The report shall contain the following:

- Date IWMD received the referral
- Date of the incident
- Area type (residential, industrial, mixed)
- Location
- District
- Inspector's name
- Investigation date
- Inspector's investigation summary
- Date response to WCSD
- Follow up action if needed

2.7 The Senior IW Coordinator will refer SSO addresses/locations that are identified as residential to the Sanitary Engineering Associate II Residential Outreach Coordinator for appropriate action.

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3 SOP For Sanitary Engineering Associate II CCTV Analyst (SEA II CCTV Analyst)

- 3.1 The SEA II CCTV Analyst is responsible for viewing the CCTV(s) for incoming SSO referrals from WCSD.
- 3.2 The SEA II CCTV Analyst will obtain a copy of the close circuit television video (CCTV) from WCSD and view the CCTV to determine the source/cause of sewer the blockage.
- 3.3 Upon completion of the CCTV review, the SEA II CCTV Analyst will forward his/her assessment as to the source/cause of the blockage to the Senior IWI Coordinator, and the Chief IWI for appropriate action.
- 2.4 The SEA II CCTV Analyst will review WCSD's Quarterly SSO Report and will notify the Senior IWI Coordinator and the Chief IWI of any discernable SSO "hot spots".

4 SOP For FOG Industrial Waste Inspectors (IWI)

- 4.1 The IWI will review SSO referral data and gather any other information that may aid in the upcoming investigation. Information should include:
 - Wye maps of the area;
 - CCTV assessment results from the SEA II, if available;
 - Previous investigation reports;
 - Food Service Establishments listed in the Permittee Information Management System (PIMS) that are upstream of the blockage and tributary to the sewer line where the blockage occurred.
- 4.2 If the source of the SSO is known [i.e. identified by WCSD, FOG Engineering] the IWI will proceed to the location within 24 hours after receiving the SSO referral (s).
- 4.3 The IWI will conduct an inspection of the facility as outlined in SOPs 001, 002 and 003.
- 4.4 The IWI shall issue a Notice of Violation (NOV), per NOV guidelines, for observed violation(s). The IWI shall also initiate the permitting process for un-permitted facilities.
- 4.5 The IWI will enter the results of SSO investigation into the appropriate database.

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4.6 If the source of the SSO is unknown, the IWI will proceed to the location within 24 hours after receiving the SSO referral. The IWI shall:

- Inspect all upstream food service establishments (FSEs), commercial and industrial facilities, [within a 1000 feet radius of the down stream maintenance hole], that are tributary the sewer line where the blockage occurred;
- The IWI will conduct inspections as outlined in SOPs 001, 002 and 003;
- The IWI shall issue a Notice of Violation (NOV), per NOV guidelines, for observed violation(s). The IWI will also initiate the permitting process for un-permitted facilities;
- The IWI will enter the results of the SSO investigation into the appropriate database.

4.7 If the source of the SSO is emanating from a residential area, this determination must be clearly reflected in the IWI's investigation report.

5. **SOP For Sanitary Engineering Associate Residential Outreach Coordinator (SEA II ROC)**

5.1 The SEA II ROC is responsible for coordinating the FOG's Residential Outreach Program activities and serves as the liaison with WESD.

5.2 The SEA II ROC will take the necessary actions to have Wastewater Engineering System Division mail FOG educational material to multi-family dwellings where it was determined that source of the SSO emanated from a residential area.