

ATTACHMENT C - SUMMARY OF VIOLATIONS AND AREAS OF CONCERN IDENTIFIED IN RELATION TO DECEMBER 6, 2019 RUSSIAN RIVER CSD COLLECTION SYSTEM COMPLIANCE EVALUATION INSPECTION

Agency Russian River County Sanitation District (RRCSD)
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Based On Compliance Evaluation Inspection, completed on December 6, 2019 and data entered into the California Integrated Water Quality System (CIWQS)
Date May 1, 2020
Revised By Cathleen Goodwin, Water Resource Control Engineer, Regional Water Board
Date April 13, 2021

	Violation/Area of Concern	Applicable Requirement(s)	Description
Violation	Based on review of "self-reported" CIWQS data reported by RRCSD between 11/25/12 and 02/26/19, the Agency certified that 2,478,739 gallons of untreated sewage reached surface waters.	SSS WDRs, Prohibitions C.1 and C.2	All of the Sanitary Sewer Overflows (SSOs) that discharged to water of the United States are in violation of Prohibition C.1 and C.2 of the SSS WDRs (page 7).
Violation	Inadequate funding to address aging infrastructure.	SSS WDRs, Provisions D.8, D.9, and D.13 (viii)	The inspection confirmed ongoing concerns by the Regional Board of inadequate capital improvement funding needed to address aging collection system infrastrucutre, such as pump stations nearing the end of their useful lives. This same concern was also documented in the 2017 inspection completed by the Regional Board and OE. During the 2019 inspection, corrosion, exposed wiring, and pump rail wear were noted at the Vacation Beach (Photo 6) and Main (Photo 15) lift stations. At the Rio Nido lift station, there was evidence of corrosion (Photo 21) and one of the isolation valves (Photo 24) had been out of service for two months at the time of inspection. Corrosion was also documented at manholes (Photos 4 and 13). Debris (a dark, silty material) was noted on the bench of several manholes as well (Photos 16, 18, 20, 26, and 28) and one manhole showed signs of surcharging (Photo 20).
Violation	Inadequate wet weather operations from inflow and infiltration (I/I).	SSS WDRs, Provisions D.8 and D.10	The inspection confirmed ongoing concerns by the Regional Board of severe impacts to the RRCSD collection system resulting from inflow and infiltration (I/I). The inspection revealed signs of surcharging in some of the manholes (Photos 18 and 20) and one of the lift stations (Photo 21). Furthermore, a dark, silty material was noted on the bench of several manholes (Photos 16, 18, 20, 26, and 28) and RRCSD staff stated this was silt from previous storms. Inspection staff noted that the manhole covers did not have any pick holes, which would indicate the silt entered the collection system through defects in the pipes. These same defects would also be a source of infiltration during storm events. Additionally, three large SSOs that occurred in 2019 (SSO ID Nos. 856208, 856704, and 856715) listed the cause of the SSO as "flow exceeded system capacity due to I/I related to a storm event." I/I was a concern documented in the 2017 inspection completed by the Regional Board and OE, as well.
Violation	Inadequate routine maintenance at Rio Nido Lift Station.	SSS WDRs, Provisions D.8 and D.13(vii)	The inspection revealed a significant fats, oils, and grease (FOG) may present inside the wet well of the Rio Nido Lift Station (Photo 21) indicative of inadequate routine maintenance.
Violation	Failure to correctly categorize one large SSO.	Amended MRP Order No. 2013-0058-EXEC	RRCSD changed SSO ID 856715 from a Category 1 to a Category 2, but did not update the 45-day technical report. During the inspection, inspectors revealed that SSO ID 856715 was mis-reported by RRCSD and should have remained certified as a Category 1 SSO (Photo 9).
Violation	Failure to conduct SSMP Program Audits.	SSS WDRs, Provision D.13(x)	RRCSD must complete an SSMP Program Audit every two years to evaluate the effectiveness of their SSMP, including compliance with required SSMP elements. According to records provided by RRCSD, they have only completed program audits in 2011 and 2016. Additionally, the program audit form for 2016, provided by RRCSD, has not been filled out.
Violation	Failure to update its CIWQS "Collection System Questionnaire" to accurately reflect current information at least every 12 months.	Amended MRP Order No. 2013-0058-EXEC	RRCSD is required to update its collection system questionnaire at least every 12 months to accurately reflect current information. RRCSD made updates to their questionnaire on May 1, 2007 and June 16, 2010, leaving a period of 37 months without updates.
Violation	Failure of RRCSD's Overflow Emergency Response Plan (OERP) to include procedures for recovering SSOs that have discharged to bodies of water, such as creeks and rivers.	SSS WDRs, Provisions D.7 and D.13(vi)(f)	When a SSO occurs, RRCSD is required to take all feasible steps and necessary remedial actions to recover as much of the wastewater discharged as possible for proper disposal. RRCSD's OERP does not include procedures for recovering SSOs that have discharged to bodies of water. Additionally, the inspection revealed that they do not take any action during wet weather events to recover wastewater from SSOs.
Violation	Failure to submit a "No Spill" certification statement for 7 different months within the required timeframe of the General WDR.	Amended MRP Order No. 2013-0058-EXEC	RRCSD is required to submit a certification statement online to CIWQS within 30 days after the end of each calendar month in which no SSOs occurred. The following months were certified past the 30 day requirement: December 2018 (5 days late), November 2016 (5 days late), November 2015 (35 days late), October 11 (1 days late), June 2010 (186 days late), June 2009 (7 days late), and September 2007 (14 days late). (In addition, the City inadvertently submitted two entries for May 2010. RRCSD should contact the CIWQS helpline at 1-866-792-4977 to get one of these entries removed.)**
Violation	Failure to meet the 2-hour notification requirements for four (4) individual Category 1 SSOs.	Amended MRP Order No. 2013-0058-EXEC	RRCSD failed to timely notify CalOES within 2 hours of becoming aware of SSO IDs 794538, 788560, and 788554. In addition, RRCSD failed to notify CalOES at all of SSO ID 856209.
Violation	Failure to meet the 3 business day draft reporting requirement for six (6) individual Category 1 SSOs.	Amended MRP Order Nos. 2008-0002-EXEC and 2013-0058-EXEC	RRCSD failed to meet the 3 business day draft reporting requirement for SSO IDs 856704, 856209, 833956, 803943, 788560, and 788554.
Violation	Failure to meet the 15-day certification requirement for six (6) individual Category 1 SSOs.	Amended MRP Order No. 2013-0058-EXEC	RRCSD failed to meet the 15-day certification requirement for SSO IDs 856715, 856704, 856209, 856208, 833956, and 832709.

Area of Concern	Timeliness to complete force main Enhanced Compliance Action	Administrative Civil Liability (ACL) Final Order No. R1-2016-0022	The inspection included ongoing concerns by the Regional Board related to the completion of an Enhanced Compliance Action, as part of ACL No. R1-2016-0022. RRCSD should address the regional board concerns and provide a written report of the expected timeline for completion of the project.
Area of Concern	RRCSD's Wet Weather Standard Operating Procedures manual is deficient.	SSS WDRs, Provisions D.8 and D.10	The inspection revealed that RRCSD's Wet Weather SOPs consist solely of mapped flood zones, a list of valves in low flood areas, and photos of the valves. There are no written SOPs.
Area of Concern	RRCSD's inflow and infiltration (I/I) prevention and control methods are deficient.	SSS WDRs, Provision D.8	The inspection revealed a dark, silty material on the bench of several manholes. RRCSD staff stated this was silt from previous storms. Inspection staff noted that the manhole covers did not have any pick holes, which would indicate the silt entered the collection system through defects in the pipes.
Area of Concern	RRCSD's collection system contains areas with a potential for surcharging.	SSS WDRs, Provision D.10	The inspection revealed evidence of surcharging in one of the manholes inspected, indicating a potential capacity issue during wet weather events.
Area of Concern	Ongoing vacancy.	SSS WDRs, Provision D.8	The inspection revealed an ongoing sewer system vacancy for over 1 year that had not been filled at time of inspection.

**Days in parenthes were modified on April 13, 2021 to correct an error in calculating the number of days late in the May 1, 2020 version.