TENTATIVE CEASE AND DESIST ORDER NO. R2-2008-00XX

REQUIRING THE

CITY OF SAN MATEO
TOWN OF HILLSBOROUGH
CRYSTAL SPRINGS COUNTY SANITATION DISTRICT
in
SAN MATEO COUNTY

TO CEASE AND DESIST DICHARGING WASTE FROM THEIR RESPECTIVE SANITARY SEWER SYSTEMS IN VIOLATION OF REQUIREMENTS IN REGIONAL WATER BOARD ORDER NOS. 01-071 AND R2-2007-0075 (NPDES PERMIT NO. CA 0037541), WATER QUALITY CONTROL PLAN FOR THE SAN FRANCISCO BAY BASIN, AND STATE WATER BOARD ORDER NO. 2006-0003 DWQ

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

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CITY OF SAN MATEO
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TO CEASE AND DESIST DISCHARGING WASTE FROM THEIR RESPECTIVE SANITARY SEWER SYSTEMS IN VIOLATION OF REQUIREMENTS IN REGIONAL WATER BOARD ORDER NOS. 01-071 AND R2-2007-0075 (NPDES PERMIT NO. CA 0037541), WATER QUALITY CONTROL PLAN FOR THE SAN FRANCISCO BAY BASIN, AND STATE WATER BOARD ORDER NO. 2006-0003 DWQ

WHEREAS the California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter "Regional Water Board") finds that:

Applicable Permits and Requirements

1. **NPDES Permit (2001–2008).** On June 20, 2001, the Regional Water Board adopted Order No. 01-071 (NPDES Permit No. CA 0037541) prescribing waste discharge requirements to the City of San Mateo for its discharges from the City of San Mateo's Wastewater Treatment Plant (San Mateo WWTP). The San Mateo WWTP provides secondary and advanced secondary treatment for domestic and commercial wastewater from the City of San Mateo, the City of Foster City, the Town of Hillsborough, and portions of the City of Belmont and unincorporated San Mateo County (Crystal Springs County Sanitation District). The San Mateo WWTP has an average dry weather design capacity of 15.7 million gallons per day (mgd) and a peak wet weather flow capacity of approximately 40 mgd.

2. **NPDES Permit (2008–present).** On November 1, 2007, the Regional Water Board adopted Order No. R2-2007-0075 (NPDES Permit No. CA 0037541), reissuing the permit to the City of San Mateo for discharges from the San Mateo WWTP and associated sewage collection system. Order No. R2-2007-0075 became effective on February 1, 2008, and superceded the requirements of Order No 01-071.

3. The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Board, Office of Administrative Law and the U.S. EPA, where required. In

4. **Sanitary Sewer Overflow (SSO) Requirements (2004–2006).** By letter dated November 15, 2004, the Regional Water Board notified sewer system authorities of new requirements for reporting SSOs including requirements to (1) electronically report SSOs to the Regional Water Board SSO eReporting Program, and (2) submit an annual report of all SSOs. By letter dated July 7, 2005, the Regional Water Board required sewer system authorities to each submit a Sewer System Management Plan (SSMP) by August 31, 2008.

5. **SSO Statewide Permit (2006–present).** On May 2, 2006, the State Water Resources Control Board (State Water Board) adopted Order No. 2006-0003 DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, to regulate discharges of waste from sanitary sewer collection systems (collection systems) within the State of California. One of the requirements in Order No. 2006-0003 DWQ is the development of an SSMP similar to that already required by the Regional Water Board. As owners and operators of collection systems, the City of San Mateo, the Town of Hillsborough, and the Crystal Springs County Sanitation District are required to comply with the requirements of Order No. 2006-0003 DWQ.

6. **SSO Reporting Requirements (2006–present).** By letter dated September 29, 2006, the Regional Water Board notified sewer system authorities of changes in requirements for electronic reporting of SSOs. The letter informed the sewer system authorities to electronically report SSOs to the Regional Water Board SSO eReporting Program through May 1, 2007, and then begin reporting SSOs to the statewide system on May 2, 2007, as required by Order No. 2006-0003 DWQ.

History of the San Mateo WWTP and its Satellite Collection Systems

7. **Joint Powers Agreement.** The San Mateo WWTP operates under a Joint Powers Agreement (JPA) between the City of San Mateo and the Foster City Estero Municipal Improvement District (EMID). Foster City acquired an interest in the San Mateo WWTP to ensure adequate future treatment capacity. The City of San Mateo currently owns approximately 75% of the San Mateo WWTP and EMID owns approximately 25%. The original JPA (dated 1974) has been subsequently amended to address expansions and use by each party.

8. **Treatment Plant Construction and Upgrades.** A treatment plant was originally constructed at the site of the San Mateo WWTP in 1935. In 1974, the Cities of San Mateo and Foster City, and the Town of Hillsborough chose to be sewered together and jointly applied and received a U.S. EPA clean water grant for loans to construct the treatment facilities. The San Mateo WWTP originally was constructed as two parallel plants, each with two aeration basins and two clarifiers, to treat high chloride and low chloride water separately.

   Subsequently, the San Mateo WWTP has undergone a number of upgrades and improvements. The latest upgrade in 1992 combined the two parallel plants and added a secondary clarifier (doubling the capacity), a fifth aeration basin, and a dissolved air flotation

system. These upgrades increased the dry weather design capacity of the San Mateo WWTP from 13.6 mgd to 15.7 mgd.

The current San Mateo WWTP includes primary clarifiers, aeration basins, secondary clarifiers, pressure filters, chlorination, dechlorination, and an outfall which discharges to a deep water channel in lower San Francisco Bay.

9. **Satellite Collection Systems.** The Crystal Springs County Sanitation District's sanitary sewer collection system (collection system) serves an unincorporated area of San Mateo County. The County of San Mateo operates the Crystal Springs County Sanitation District. In addition, sewage from a small disconnected part of the City of San Mateo and some San Mateo County buildings flows into the Crystal Springs County Sanitation District's collection system. Sewage from the Crystal Springs County Sanitation District's collection system flows through the Town of Hillsborough's collection system via the Crystal Springs/El Cerrito Trunk Sewer.

   The majority of the sanitary sewage from the Town of Hillsborough's collection system flows through Crystal Springs/El Cerrito Trunk Sewer into the City of San Mateo's collection system and is treated at the San Mateo WWTP. The remaining sanitary sewage from the Town of Hillsborough flows to the City of Burlingame's wastewater treatment plant.

   Table 1 summarizes the details of each of the collection systems that use the Crystal Springs/El Cerrito Trunk Sewer.

   Table 1. Collection Systems using the Crystal Springs/El Cerrito Trunk Sewer

System	Miles of Pipe	# Pump Stations	Population
City of San Mateo	310	23	94,650
Town of Hillsborough	117	4	11,000
Crystal Springs County SD	19	0	5,600

10. **Sanitary Sewage Agreement** The City of San Mateo has a sanitary sewage agreement (SSA), dated July 18, 1989, with the Town of Hillsborough, Crystal Springs County Sanitation District, and the County of San Mateo regarding the discharge, pumping, transmission, and treatment of sewage and the ownership of facilities. The SSA defines the ownership of the collection systems as follows:

    A. Those portions of the Polhemus Trunk Sewer that are within the boundaries or corporate limits of the Crystal Springs County Sanitation District, County of San Mateo, or City of San Mateo, respectively, remain under the ownership of the Crystal Springs County Sanitation District, County of San Mateo, or City of San Mateo, respectively.

B. The Crystal Springs/El Cerrito Trunk Sewer remains under ownership of the Town of Hillsborough.

C. The Tilton/Idaho and Yew/Borel Trunk Sewer remains under the ownership of the City of San Mateo.

D. The Jointly Used Facilities (everything after the intake to the Dale Avenue Pump Station, such as the San Mateo WWTP) remain under the ownership of the City of San Mateo, except as may otherwise defined by agreement between the City of San Mateo and the Estero Municipal Improvement District (City of Foster City).

The SSA specifies that each party to the SSA is responsible for any necessary maintenance, repair, or improvement of the trunk sewer under their ownership as defined above. The City of San Mateo is responsible for the Jointly Used Facilities. (See Finding 9.D. above.) The SSA also specifies how flows will be measured and how costs will be distributed between the parties to the SSA based on the ratio of each party's flows of wastewater to the total flows of wastewater through the San Mateo WWTP.

Violations

11. Based on the SSOs identified in Finding 15, the Regional Water Board finds that the City of San Mateo has violated the following requirements of Order No. 01-071 (NPDES Permit No. CA0037541):

    a. Discharge Prohibition A.4

    "Discharges of water, material, or wastes other than stormwater, which are not otherwise authorized by an NPDES permit, to a storm drain system or waters of the State are prohibited."

    b. Provision E.4, Standard Provisions and Reporting Requirements

    "The discharger shall comply with all applicable items of the Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits, August 1993 (Standard Provisions)."

    General Provision A.1 of Standard Provisions

    "Neither the treatment nor the discharge of pollutants shall create a pollution, contamination, or nuisance as defined by Section 13050 of the California Water Code."

12. Based on the SSOs identified in Finding 15, the Regional Water Board finds that the City of San Mateo has violated the following requirements of Order No. R2-2007-0075 (NPDES Permit No. CA0037541):

a. Discharge Prohibitions III.E

"Any sanitary sewer overflow that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited."

b. Provision VI.A.2, Standard Provisions

"The Discharger shall comply with all applicable provisions of the Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits, August 1993 (Attachment G)."

Attachment G, General Provision A.1 of Standard Provisions

"Neither the treatment nor the discharge of pollutants shall create a pollution, contamination, or nuisance as defined by Section 13050 of the California Water Code."

13. Based on the SSOs identified in Finding 15, the Regional Water Board finds that the City of San Mateo, the Town of Hillsborough, and the Crystal Springs County Sanitation District have violated the following requirements of State Water Board Order No. 2006-0003 DWQ:

a. Prohibition C.1

"Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited."

b. Prohibition C.2

"Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in CWC Section 13050(m) is prohibited.

14. Based on the SSOs identified in Finding 15, the Regional Water Board finds that the Town of Hillsborough and the Crystal Springs County Sanitation District have violated the following Basin Plan prohibition:

Discharge Prohibition 15 in Table 4-1

It shall be prohibited to discharge raw sewage or any waste failing to meet waste discharge requirements to any waters of the Basin.

15. SSOs have occurred from collection systems operated by the City of San Mateo, Town of Hillsborough, and Crystal Springs County Sanitation District as summarized in Table 1 (above) and described below. Details of each SSO are in Table 2 at the end of this Order.

A. From December 2004 through July 14, 2008, 87 SSOs occurred from the City of San Mateo's collection system. Notably, 84 of the 87 SSOs, representing over 3.5 million

gallons of raw sewage, discharged to surface waters. The largest SSO was 378,000 gallons on January 25, 2008, and was caused by insufficient collection system capacity during a rain event. On that same day, 19 other SSOs totaling 2,559,800 gallons occurred from the City of San Mateo's system due to capacity problems.

B. From December 2004 through July 6, 2008, 71 SSOs occurred from the Town of Hillsborough's collection system. Notably, 53 of the 71 SSOs, representing nearly 3,000,000 gallons of raw sewage, discharged to surface waters. On January 25, 2008, 5 SSOs totaling 425,000 gallons occurred from the Town of Hillsborough's system along the Crystal Springs/El Cerrito Trunk Sewer due to capacity problems. The largest SSO along the Crystal Springs/El Cerrito Truck Sewer was 198,000 gallons on February 15, 2005, and was caused by insufficient collection system capacity during a rain event.

   It is noted that the largest SSO was 1,923,000 gallons on January 25, 2008, and was caused by flooding due to debris blockage of a creek inlet compounded by insufficient collection system capacity during a rain event. This particular SSO occurred in the part of the Town of Hillsborough where the sewage flows to the City of Burlingame's wastewater treatment plant.

C. From December 2004 through May 2008, 22 SSOs occurred from the Crystal Springs County Sanitation District's collection system. Of these, 1 SSO discharged to surface water. This SSO was 15,000 gallons on January 25, 2008, and was caused by root blockage. Table 2 contains a summary of the SSOs from Crystal Springs County Sanitation District's collection system.

16. The Regional Water Board staff compiled the above violations from its review of the following reports and information:

    A. Regional Water Board SSO eReporting Program Database Records (from December 1, 2004, to May 1, 2007.

    B. Data available from the California Integrated Water Quality System's Public Reports as maintained by the State Water Board.

    C. SSO Annual Reports submitted to the Regional Water Board by City of San Mateo, Town of Hillsborough, and County of San Mateo for the Crystal Springs County Sanitation District.

    D. SSO information submitted via e-mail to the Regional Water Board from County of San Mateo regarding Crystal Springs County Sanitation District, dated February 8, 2008.

Factors Contributing to Violations

17. **General Problems.** Each of the collection systems and the San Mateo WWTP receive high flows during the rainy season. The high flows are a result of stormwater inflow and/or groundwater infiltration (I/I) into the collection systems from leaky sewer pipes or illegal

connections of downspouts or yard drains. The collection systems currently have insufficient capacity to handle peak wet weather flows. During heavy storms, the collection systems become surcharged (pressurized due to higher than normal flows) and untreated sewage diluted with groundwater and stormwater may overflow at various locations and eventually drain to San Mateo Creek and/or San Francisco Bay via storm drainage systems.

These SSOs impact the water quality and beneficial uses of San Mateo Creek and/or San Francisco Bay. Some possible adverse effects on water quality and beneficial uses as a result of SSOs include:

- Adverse impact to fish and aquatic biota caused by solids deposition, oil and grease, and toxic pollutants common in sewage (such as heavy metals, pesticides, personal care products, and pharmaceuticals);

- Creation of a localized toxic environment in the water column as a result of the discharge of oxygen-demanding pollutants that lower dissolved oxygen, and elevated ammonia concentration which is a demonstrated fish toxicant; and

- Impairment of water contact recreation and noncontact water recreation as a result of elevated bacteria levels including pathogens.

18. **San Mateo WWTP Problems.** When secondary capacity is exceeded at the San Mateo WWTP during high wet weather flows, the City of San Mateo routes a portion of the primary effluent around biological treatment to the disinfection facility and blends it with secondary-treated effluent. Both Order Nos. 01-071 and R2-2007-0075 allow discharge of this blended wastewater during peak wet weather if the discharge meets all numeric effluent limits. Order No. R2-2007-0075 more clearly defines when such discharges are allowed under bypass conditions: when (1) the peak wet weather influent flow rates exceed the wet weather capacity of the secondary treatment units of 40 mgd, and (2) the discharge complies with NPDES permit effluent and receiving water limitations. Furthermore, Order No R2-2007-0075 requires that the San Mateo WWTP be operated as designed, which means optimization of storage and use of equalization units, and full utilization of biological treatment units and advanced treatment units.

19. **Crystal Springs/El Cerrito Trunk Sewer Problems.** The collection system, particularly along the Crystal Springs/El Cerrito Trunk Sewer, is significantly surcharged during wet weather. In part, this is a result of the way the City of San Mateo controls influent flow to the San Mateo WWTP to avoid discharge of blended wastewater. The City of San Mateo has not had to blend (i.e., a wet weather diversion) since 1999. During wet weather the City of San Mateo reduces flow from the Dale Avenue Pump Station which acts as the headworks to the San Mateo WWTP for all of the City of San Mateo's collection system west of Marina Lagoon. This part of the City of San Mateo's collection system includes wastewater flow from most of the City of San Mateo and all of the wastewater flow from the Crystal Springs/El Cerrito Trunk Sewer that serves most of the Town of Hillsborough and all of the Crystal Springs County Sanitation District.

The Dale Avenue Pump Station is configured with two wet wells that act independently during the rainy months to generally separate wastewater flow from the lowland and uphill areas. Because of this design configuration, the City of San Mateo can store some excess winter flows in the large trunk lines along easements adjacent to U.S. Highway 101 without surcharging and flooding the lowland areas between U.S. Highway 101 and Marina Lagoon. In this mode of operation, once available capacity of the trunk lines has been reached, SSOs would occur in the lowland areas in the vicinity of Delaware Street and Saratoga Drive.

The City of San Mateo can further reduce wastewater flow from the Dale Avenue Pump Station wet well that serves the uphill portion of the collection system. This reduction of flow would surcharge the collection system that includes the Crystal Springs/El Cerrito Trunk Sewer. In other words, during a storm, wastewater from the Town of Hillsborough and Crystal Springs County Sanitation District from the Crystal Springs/El Cerrito Trunk Sewer would flow to the Dale Avenue Pump Station until the capacity of the collection system upstream of the Dale Avenue Pump Station is reached. The wastewater would then start backing up within the collection system until it finds low points and overflow resulting in SSOs along the Crystal Springs/El Cerrito Trunk Sewer. During heavy rain events, SSOs have occurred along the Crystal Springs/El Cerrito Trunk Sewer as evidenced on January 4 and 25, 2008. The largest SSO among the 10 SSOs that occurred on those 2 days was 122,000 gallons on January 25, 2008, with a total volume of 643,900 gallons.

Current Operation and Maintenance of the City of San Mateo Collection System

20. **Background.** The City of San Mateo owns approximately 310 miles of sewer pipe which includes 229 miles of gravity sewer pipe, 6.8 miles of forced mains and 74 miles (lower lateral) of the 189 miles of the total lateral pipe (upper and lower). The majority of San Mateo's collection system was constructed between 1940 and 1959.

21. **Sewer Maintenance Program.** The City of San Mateo maintenance program includes hydraulically cleaning 130 miles of sewer main annually, mechanically cleaning 50 miles of sewer main annually, scheduling preventative maintenance, and cleaning 5000 catch basins annually. The City of San Mateo also conducts video condition assessment of each sewer mainline every five years in order to prioritize rehabilitation efforts, and is in the process of documenting the maintenance program in its Sewer System Management Plan (SSMP). Despite this, the City of San Mateo continues to have capacity related SSOs, and root and grease blockage related SSOs (see Table 2). Adjustments to the program are necessary.

22. **Planned Collection System Improvements.** The City of San Mateo's 20-year Capital Improvement Plan (CIP) includes significant improvements to its collection system. The City of San Mateo has budgeted $2 million per year for sewer rehabilitation, $6.5 million for the Los Prados relief sewer project, and $7 million for the South Trunk system upgrade project. In addition, the City-Wide Sewer System Study (June 2005) identified several priority projects including the Dale Avenue Pump Station Easement Parallel Sewer (which would replace the current 39-inch diameter influent trunk sewer pipe with a 60-inch diameter pipe) and the El Cerrito Relief Line.

23. **Planned San Mateo WWTP Improvements.** The City of San Mateo's 20-year CIP includes monies budgeted to expand treatment capacity ($10 million over two years from 2010 to 2012) and to construct hydraulic improvements related to outfall capacity ($10 million over two years from 2010 to 2012).

24. **Additional Future Needed Improvements.** As a condition to allowing blending, Order No. R2-2007-0075 (Provision VI.C.6) requires the City of San Mateo to evaluate the capacity of its collection system including its satellite collection systems and the flows anticipated at the San Mateo WWTP after collection system improvements. The 2007 Order then requires the City of San Mateo to develop and evaluate alternatives to reduce I/I, expand the San Mateo WWTP, implement hydraulic improvements related to outfall capacity, and prevent the need for blending in the future. Order No R2-2007-0075 requires the City of San Mateo to complete this by August 1, 2009, and implement the evaluation recommendations by December 31, 2013.

    Because the City of San Mateo operates the San Mateo WWTP, it is the only discharger named in Order No. R2-2007-0075. As such, only the City of San Mateo is required to implement any of the I/I reduction measures that will be identified by its comprehensive evaluation. It is necessary to include similar requirements on satellites to the San Mateo WWTP to ensure that they do their parts to reduce I/I to eliminate future blending because these measures will also reduce SSO violations by the satellites.

24. **Status of SSMP.** As of June 2, 2008, the City of San Mateo has developed all of the required elements of its SSMP pursuant to Regional Water Board letter dated July 7, 2005, and State Water Board Order No. 2006-0003 DWQ. However, as previously stated in Finding 19, the City of San Mateo continues to have SSOs caused by insufficient collection system capacity, and root and grease blockages. Therefore, the City of San Mateo must make necessary adjustments to reduce and eliminate SSOs from its collection system.

25. **U.S. EPA Inspection Findings.** In October 2007, U.S. EPA Region 9 staff inspected the City of San Mateo's sanitary sewer collection system. Based on the observations made during the inspection, U.S. EPA found that the City of San Mateo continues to have large volume SSOs as a result of inadequate I/I reduction.

Current Operation and Maintenance of the Town of Hillsborough Collection System

26. **Background.** The Town of Hillsborough's collection system consists of approximately 116 miles of gravity sanitary sewer lines, 1.1 miles of forced mains, and 4 pump stations serving a population of approximately 11,000 residents. The Town is predominately single family residential with several commercial and public customers. Wastewater from areas south of Black Mountain Road and West Santa Inez Avenue flow to the San Mateo WWTP. Wastewater from the area north of Black Mountain Road and West Santa Inez Avenue flows to the City of Burlingame's wastewater treatment plant.

27. **Completed Collection System Improvements.** The Town of Hillsborough conducted an I/I study in 1991. The results of the study identified several collection system improvements including source detection, I/I rehabilitation, and capacity corrections. The Town also conducted an assessment of the capacity of the Crystal Springs/El Cerrito Trunk Sewer in 1997. The Town has completed seven phases of cleaning and inspection projects and eight rehabilitation projects since 1995. The Town funded these repairs by issuing five rounds of bonds since 1995. The bond cycles started in 1995 and the latest was issued in 2006 totaling approximately $20 million in funds for improvement to the collection system.

28. **Increase in Required Maintenance of Crystal Springs/El Cerrito Trunk Sewer.** The catalyst for the Crystal Springs/El Cerrito Trunk Sewer improvement project was the increased maintenance required along this segment of the Town's sewer conveyance system in the early 1990s. The sewer crews were conducting weekly inspections and repairs to the pipes along Crystal Springs Road. Once these work orders exceeded the crews' capacity to complete the repairs, SSOs occurred more frequently due to the faulty pipes.

29. **Completed Improvements to Crystal Springs/El Cerrito Trunk Sewer** The Crystal Springs/El Cerrito Trunk Sewer conveyance system is approximately 15,800 linear feet long within the Town. From the Crystal Springs County Sanitation District/Town of Hillsborough boundary towards the San Mateo WWTP, the Town replaced approximately 4,400 feet of the sewer line by pipe bursting the existing 15 and 18-inch lines to 24 and 27 inches, respectively, using seamless pipe. The Town lined an additional 4,500 feet of the trunk sewer with cured-in-place pipe to prevent I/I and leaks. The Town also cleaned, videoed, and foamed the remaining section of the trunk sewer line to the City San Mateo city limit with an herbicide to prevent root growth. The Town completed additional spot repairs where pipe failures were found.

30. **Planned Upgrading of Crystal Springs/El Cerrito Trunk Sewer.** According to the Town's assessment, the Crystal Springs/El Cerrito Trunk Sewer is in excellent condition, but approximately 11,430 linear feet of the collection system is still undersized to handle peak wet weather flows. As of July 2007, the Town has completed 95% of the design for a project to expand the capacity of the trunk line. However, correspondence from the Town and the City of San Mateo states that the City of San Mateo's downstream section of the trunk line is also undersized and will not be able to handle the increased flow if the sewer mains in the Town are upgraded. Furthermore, the correspondence from the Town and the City of San Mateo states that the San Mateo WWTP cannot handle the increased flow from the trunk line if it was upgraded. Therefore, the Town has decided to wait until the City of San Mateo addresses the WWTP capacity issue and upgrades its portion of the trunk line before proceeding.

31. **Status of SSMP.** As of June 2, 2008, the Town of Hillsborough has developed all of the required elements of its SSMP pursuant to Regional Water Board letter dated July 7, 2005, and State Water Board Order No. 2006-0003 DWQ. However, the Town of Hillsborough continues to have SSOs caused by insufficient capacity and root blockages. Therefore, the Town of Hillsborough must make necessary adjustments to reduce and eliminate SSOs from its collection system.

32. **U.S. EPA Inspection Findings.** In November 2007, U.S. EPA staff inspected the Town's sanitary sewer collection system. Based on the observations made during the inspection, U.S. EPA found that the Town's SSOs during wet-weather are primarily caused by inadequate capacity. Specifically, the inspection report stated that the Town needs to upgrade its 14" diameter portion of the interceptor (Crystal Springs/El Cerrito Trunk Sewer) to a 24" interceptor to properly transfer sewage to the City of San Mateo WWTP.

Current Operation and Maintenance of the Crystal Springs County Sanitation District Collection System

33. **Background** Crystal Springs County Sanitation District (District) is situated upstream of the Town of Hillsborough. The District's collection system consists of approximately 19 miles of sewer pipe with a population of approximately 5,600 people. All of the sewage generated in the District flows to the San Mateo WWTP via the Crystal Springs /El Cerrito Trunk Sewer.

34. **Completed Sewer Upgrades** The District developed a Crystal Springs Sewer Master Plan in August 1999. The Plan identified nine capital improvement projects (CIPs) based on capacity limitations along with structural deficiencies of the collection system. In 2003, the District completed the Polhemus Road (north) replacement sewer project (the only capacity related CIP identified in the Plan). This project is situated immediately upstream of the Town of Hillsborough, and cost approximately $820,000. It consisted of upgrading the capacity of approximately 5,000 linear feet of pipe.

35. **Insufficient Funding for Identified CIPs** The eight remaining identified CIPs would correct structural deficiencies that increase maintenance costs, or would replace deteriorated sections that are close to the point where failure may occur in the near future. None of these remaining CIPs have been started due to insufficient funds. These remaining CIPs have an estimated construction cost of approximately $3 million. The Polhemus Road project has reduced SSOs that were caused by insufficient capacity in the District, but the deficiencies that would be fixed with the remaining eight CIPs continue to be a source of I/I causing SSOs in downstream communities such as the Town of Hillsborough and the City of San Mateo.

    In accordance with the Sanitary Sewage Agreement (see Finding 10), the District is responsible for paying a proportionate share for downstream (out-of-district) capital improvement projects. The Town of Hillsborough completed a 4,400-foot pipe replacement project (Finding 29) in which the District's financial responsibility is $1.177 million. The City of San Mateo is nearing completion of a CIP at the WWTP (the replacement and expansion of the solids processing unit) in which the District's financial responsibility is approximately $1.357 million. These downstream CIPs have and will continue to significantly affect the sewer rates for the District.

    The District attempted to raise the sewer service charge rates for the 2006-07 fiscal year to provide the revenue to finance the completed Town of Hillsborough pipe replacement

project, the WWTP project, and other District operating expenses. However, 936 property owners (out of 1,429 property owners) within the District levied a Proposition 218 majority protest which precluded a rate increase. As a result of the protest, the sewer service charge rate for 2006-07 remained at $496 per equivalent residential unit (ERU). There are 1,501 ERUs in the District.

The District worked to increase sewer service charge rates for the 2007-08 fiscal year and presented four rate options to the property owners to consider. The property owners selected the least expensive option of $900 per ERU which the District's Board of Supervisors approved on July 24, 2007. The $900 rate includes payment to the Town of Hillsborough for the completed pipe replacement project, but does not include payment to the City of San Mateo for the WWTP CIP. Also, the sewer rate does not include monies for in-district CIPs.

36. **Status of SSMP** As of June 2, 2008, the District has developed all of the required elements of its SSMP pursuant to Regional Water Board letter dated July 7, 2005, and State Water Board Order No. 2006-0003 DWQ. However, the District continues to have SSOs caused by root blockages. Therefore, the District must make necessary adjustments to reduce and eliminate SSOs from its collection system.

Regional Water Board Authority to Enforce and Require Information

37. The California Water Code (CWC) § 13301 authorizes the Regional Water Board to issue a Cease and Desist Order when it finds that a waste discharge is taking place, or threatening to take place, in violation of Regional Water Board or State Water Resources Control Board requirements.

38. CWC § 13267 authorizes the Regional Water Board to require any agency who has discharged, discharges, or is suspected of having discharged or discharging, within its region, to furnish technical information to investigate the quality of any waters of the state.

39. CWC § 13383 authorizes the Regional Water Board to establish monitoring and reporting requirements for any person who introduces pollutants into a publicly owned treatment works.

40. This Order requires the City of San Mateo, Town of Hillsborough, and the District to each submit reports and technical information pursuant to CWC § 13267. The reports and technical information are necessary to assess each agency's sewer system management to reduce and eliminate SSOs. The City of San Mateo, Town of Hillsborough, and the District must provide this information as SSOs have occurred from their respective sanitary sewer collection systems.

40. This Order is an enforcement action and, as such, is exempt from the provisions of the California Environmental Quality Act (Public Resources Code § 21000 et seq.) in accordance with California Code of Regulations § 15321.

41. The Regional Water Board notified the dischargers and interested persons of its intent to consider adoption of the Cease and Desist Order, and provided an opportunity to submit written comments and appear at a public hearing. The Regional Water Board, in a public hearing, heard and considered all comments.

IT IS HEREBY ORDERED, in accordance with CWC § 13301, that the City of San Mateo, Town of Hillsborough, and the Crystal Springs County Sanitation District (District) shall cease and desist from discharging and threatening to discharge wastes in violation of State and Regional Water Board orders by complying with the following provisions:

I. IMMEDIATE ELIMINATION OF SSOs

A. Beginning immediately, the City of San Mateo, Town of Hillsborough, and the District shall consistently and substantially reduce the frequency and volume of SSOs from the Crystal Springs/El Cerrito Trunk Sewer and its respective collection systems to waters of the United States. In doing so, the City of San Mateo, Town of Hillsborough, and the District shall also not cause or contribute to SSOs by the other agencies. Specifically, the City of San Mateo must properly operate its Dale Avenue Pump Station to fully use the San Mateo WWTP and discharge outfall capacities so as to reduce and eliminate SSOs upstream.

B. The City of San Mateo, Town of Hillsborough, and the District shall complete improvements necessary to eliminate conditions in its collection system that cause or contribute to SSOs or unauthorized discharges from the City of San Mateo's collection system or WWTP. These include, but shall not be limited to, the following:

1. By October 31, 2013, the Town of Hillsborough shall complete implementation of the capacity upgrade to the Crystal Springs/El Cerrito Trunk Sewer that is nearing design completion.

2. By October 31, 2013, the District shall complete implementation of the remaining eight CIPs identified in the Crystal Springs Sewer Master Plan dated August 1999.

3. By December 31, 2013, the City of San Mateo, Town of Hillsborough, and the District shall complete implementation of recommended I/I reduction measures identified by the August 1, 2009, evaluation being performed pursuant to Regional Water Board Order No. R2-2007-0075 at Provision VI.C.6.

II. SPILL RESPONSE, RECORDKEEPING, NOTIFICATION & REPORTING

A. **Sanitary Sewer Overflow (SSO) Response Plan** By January, 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each implement, and submit to the Regional Water Board an SSO Response Plan for its collection system that describes emergency response and contingency procedures to address SSOs from its collection system, including measures for containing and recovering spilled sewage, establishment of interim system operations, and timely repair and restoration of normal operations. Each agency shall ensure that its staff and responders are adequately trained to perform the procedures outlined in its SSO Response Plan. Each plan shall include the following:

1. Procedures to notify the responders during normal business hours and after business hours. The responders shall arrive on the scene of the SSO with equipment within 60 minutes after notification, and deploy the necessary posting to protect the public.

2. Procedures to ensure containment, termination, maximum recovery, and cleanup of spilled sewage. These procedures shall prevent spills from reaching storm drains and surface water, and mitigate the impact of spills that reach storm drains and surface water.

3. Procedures to estimate spill volume. The procedures must include more than one estimation method to cover different spill scenarios.

4. Procedures to secure the area surrounding a spill and post warning signs as necessary in coordination with the County of San Mateo's Health Department.

5. Procedures to sample and monitor various types of surface waters (e.g., creeks and the bay) following spills.

6. A list of necessary spare parts and emergency equipment to ensure adequate response time and maximum recovery of spilled sewage.

7. A description of staffing needs required to respond to SSOs and whether staffing duties will be carried out by agency staff, staff from other agencies, or private contractor(s). To the extent that SSO response duties will be carried out by private contractor(s), the plan shall describe the contractor and include copies of the contracts obligating the contractor(s) to fulfill the requirements of the SSO response plan implemented pursuant to this Order.

8. For spills in homes and businesses, the plan must include procedures for cleaning the spill area.

B. **Recordkeeping** The response plan developed in Paragraph II.A shall include procedures for agency staff or its contractor(s) to maintain records of spill incidents, including field reports that provide adequate information to meet reporting

requirements to regulatory agencies, and procedures to link these records to the Maintenance Management System described in Paragraph III.B.

C. **Notification** The response plan developed in Paragraph II.A shall include procedures for notifying the public, including schools and recreational clubs that may be affected by the spill. The plan should include procedures for advising the public to avoid contact and to take steps, as appropriate, in cases of contact with spilled sewage. The plan shall identify the agency staff person(s) responsible for public notification. Within 2 hours of becoming aware of the SSO, notification must be provided to the Office of Emergency Services, County of San Mateo Health Department, and the Regional Water Board.

D. **Reporting** The response plan developed in Paragraph II.A shall include procedures for reporting spills, as required, to the appropriate regulatory agencies, including the Regional Water Board, State Water Board, the State of California's Office of Emergency Services, and the County of San Mateo's Health Department. The plan shall identify the agency staff person(s) responsible for reporting SSOs.

III. COLLECTION SYSTEM MAINTENANCE AND MANAGEMENT

A. Sewer System Cleaning and Root Control Program

1. By March 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each implement and submit to the Regional Water Board its plan for a Sewer System Cleaning and Root Control Program to ensure regular cleaning of its sewer pipes. The program shall ensure that at least 30 percent of the respective agency's pipe mileage is cleaned each year, such that the entire collection system is cleaned within the first three years. The program must be sufficient to eliminate or reduce blockage-related spills and shall include the following elements:

    a. A schedule for routine cleaning of the agency's entire collection system;

    b. A list of locations where pipe blockages and SSOs have frequently occurred ("hot spots"), a plan to regularly monitor these areas, a hot spot cleaning schedule, and procedures for adjusting the hot spot cleaning schedule based on changing conditions;

    c. Written procedures for cleaning and repairing sewer pipes in easements including cleaning schedules, instructions for gaining access to sewer pipes in easements, and cleaning procedures;

    d. A plan for preventing blockage of sewer pipes by roots, including a description of root control methods, locations where root control methods may

be used within the collection system, and a schedule for application of root control methods; and

e. A plan for staffing the sewer system cleaning and root control program, indicating whether duties will be carried out by agency staff, staff from other agencies, or private contractor(s). To the extent that any sewer cleaning or root control duties will be carried out by private contractor(s), the plan shall describe the contractor and include copies of the contracts obligating the contractor(s) to fulfill the requirements of the sewer system cleaning and root control program implemented pursuant to this Order.

2. The City of San Mateo, Town of Hillsborough, and the District shall each submit an annual report to the Regional Water Board documenting activities of its sewer cleaning and root control program during the previous annual cycle. The annual reports shall include miles of pipe cleaned as part of the routine and hot spot cleaning programs and miles of pipe treated by each method used for controlling roots. The City of San Mateo, Town of Hillsborough, and the District shall each include a description of the success of the sewer cleaning and root control program at preventing blockages and sewage overflows as well as any changes to be made to the program to further reduce spills.

B. **Maintenance Management System**

By March 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each submit a report describing its computerized sewer maintenance management system (MMS). The report shall include a description of the capabilities and uses of the MMS such as scheduling and tracking completion of sewer cleaning, maintenance, and repairs. The report shall specify if the MMS can record information on sewer system inspections, condition ratings, and sewers that have been repaired, rehabilitated, and replaced. The report shall also specify if the MMS can generate reports summarizing SSOs and identifying hot spots.

C. **Pump Station and Force Main Reliability Certification**

1. By November 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each submit to the Regional Water Board a report describing the pump stations within its collection system, including the number of primary and redundant pumps, pumping capacity, emergency generators, alarm systems, and the estimated time to overflow in the event of station failure during peak dry weather flow.

2. By November 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each certify to the Regional Water Board that each pump station for which it is responsible is equipped for peak wet weather flows and continuous operation in the event of electrical failure, mechanical failure, or power outage.

3. If an agency is unable to certify that a pump station is adequately equipped, the agency by November 15, 2009, shall submit a plan, including a schedule and financial plan, for completing all repairs, renovations, and upgrades on each pump station and force main to ensure adequate capacity for peak wet weather flows and to ensure continuous operation.

4. The City of San Mateo, Town of Hillsborough, and the District shall each submit an annual report to the Regional Water Board documenting pump station and force main renovations, and upgrades during the previous year and describing projects to be completed in the coming annual cycle.

D. Fats, Oils & Grease (FOG) Blockage Control Report

By March 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each submit a report documenting its program to control sources of FOG and the effectiveness of the program at eliminating grease blockages. The report shall include the following information:

1. A list and a map showing the locations where grease blockage spills have occurred and, if known, the sources causing the spill;

2. A summary of sewer cleaning activities aimed at sewer pipes prone to blockages by grease;

3. A description of FOG source control programs, including ordinances, treatment, best management practice requirements, source inspections and enforcement procedures, and outreach and education efforts;

4. A description of the effectiveness of the program at controlling and eliminating grease blockages; and

5. A description of any modifications implemented to improve the effectiveness of the FOG control program.

IV. COLLECTION SYSTEM CONDITION AND CAPACITY ASSESSMENTS

A. Sewer Pipe and Manhole Inspection and Condition Assessment

1. By March 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each submit a plan to the Regional Water Board for periodic inspection and assessment of the condition of gravity sewers and manholes throughout its collection system. The inspection and condition assessment program shall evaluate the condition of pipes following blockage-related spills, identify pipes in need of emergency repair, and complete a system-wide condition assessment no later than November 15, 2010. The requirements for system-wide

condition assessment may be satisfied with reliable condition data obtained from an inspection and assessment conducted within the last five years. The plan shall describe the following information:

a. Inspection methods to be used, including direct visual inspection and closed circuit television (CCTV) inspection, and whether each agency will purchase, lease, or contract for CCTV inspection equipment;

b. An inspection schedule including an estimate of how many manholes and miles of pipe will be inspected each year for the next two years; and

c. A plan for timely evaluation of inspection findings and documentation of the assessed condition.

2. By March 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each submit a report to the Regional Water Board summarizing the findings of its inspections and condition assessments completed during the previous five years.

3. By March 15, 2010, the City of San Mateo, Town of Hillsborough, and the District shall each submit a progress report to the Regional Water Board summarizing the inspection methods and findings of the sewer pipe condition assessments conducted during the previous year and the estimated miles of sewer pipe and number of manholes planned to be inspected during the current year.

4. By March 15, 2011, the City of San Mateo, Town of Hillsborough, and the District shall each submit a final report summarizing the findings of the inspections and condition assessments required by Paragraph IV.A.1.

B. **Capacity Assessment**

1. By March 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall each install flow meters to assess average and peak dry and wet weather flow rates through its collection system. The flow meters shall be capable of generating data to satisfy the reporting requirements in subsection IV.B.3.

2. The City of San Mateo, Town of Hillsborough, and the District shall each submit an annual report to the Regional Water Board providing the results of its collection system flow monitoring, including the average dry weather flow and peak wet weather flow from its collection system.

3. By March 15, 2011, the City of San Mateo, Town of Hillsborough, and the District shall each complete an assessment and submit a report to the Regional Water Board on collection system flows and hydraulic capacity. The assessments shall include flow measurements, visual observations of flow levels and

predictive modeling as needed to complete a report that includes the following information:

a. Identifies areas, sources and quantities of significant inflow to the sewage collection system;

b. Identifies areas, sources and quantities of significant infiltration to the sewage collection system;

c. Identifies any bottlenecks in the collection system which lack sufficient capacity to convey sewage flows through the collection system and to the San Mateo WWTP during wet weather;

d. Provides a discussion of the impact of wet weather flow from one agency to another as well as the impact on the San Mateo WWTP; and

e. Describes a method for the allocation of peak wet weather flows between the City San Mateo, Town of Hillsborough, and the District to the San Mateo WWTP from the Crystal Springs/El Cerrito Trunk Sewer, and a future flow monitoring program to guide and assess adherence to their peak flow allocations.

4. If any of the agencies have completed the work described in either Paragraph IV.B.1 or Paragraph IV.B.3 within the past two years, a summary of the work and findings may be submitted to satisfy the requirements of these paragraphs.

V. CAPACITY ASSURANCE

A. **Short-Term Contingency Plan**

By March 15, 2009, the City of San Mateo shall develop a short-term contingency plan for improvements necessary to eliminate bypasses or spills from the San Mateo WWTP to San Francisco Bay and its tributaries. The plan may include options for equalization basins or implementing other measures to eliminate overflows to San Francisco Bay.

B. **Capacity Assurance Plan**

1. By March 15, 2010, the City of San Mateo, Town of Hillsborough, and the District shall each propose and schedule improvements identified in the condition and capacity assessments completed in Provision IV. The plan(s) shall consider the effects that existing capacity limitations and future upgrades may have on the City of San Mateo WWTP and its other contributing collection systems. The plan(s) should be sufficient to eliminate spills from the collection systems and wastewater treatment plant during peak wet weather flows.

2. By November 15, 2013, the City of San Mateo, Town of Hillsborough, and the District shall each complete the improvements identified pursuant to Paragraph V.B.1. The improvements shall address preliminary inflow and infiltration control, conveyance of peak flows, storage of peak flows, and improvements to treatment plant capacity.

VI. INFRASTRUCTURE RENEWAL

A. **Sewer Repair, Rehabilitation, and Replacement**

By March 15, 2011, the City of San Mateo, Town of Hillsborough, and the District shall each submit a plan to the Regional Water Board for both short-term (repairs of acute defects to be completed within one year of identification in the inspection and condition assessment program) and long-term repair, rehabilitation and replacement of sewer pipes. The plan shall include a schedule and financial plan. The plan shall be sufficient to (1) ensure timely repair of sewer pipes in imminent danger of failure or blockage, (2) ensure the long range sustainable rehabilitation or replacement of assets, (3) improve system performance and reduce spills caused by pipe defects and blockages from roots and debris, and (4) control inflow and infiltration as needed pursuant to the Capacity Assurance Plan in Paragraph V.B. The plan shall include the following information:

1. The length of pipe repaired, rehabilitated, or replaced during the last 20 years. If records are not available, then provide an estimate of the length of pipe repaired, rehabilitated, or replaced and a basis for the estimation;

2. An estimate of miles of sewer pipe to undergo emergency repair or replacement each year;

3. An estimate of the miles of sewer pipe to be rehabilitated or replaced over the next 10 years and identification of the pipe to be rehabilitated or replaced in the next 5 years;

4. A 10-year financial plan for short-term and long-term repair, rehabilitation and replacement of sewer pipes; and

5. A plan to address private lateral repair, rehabilitation and replacement as needed pursuant to the Capacity Assurance Plan in Paragraph V.B.

B. **Annual Report**

The City of San Mateo, Town of Hillsborough, and the District shall each submit an annual report to the Regional Water Board documenting sewer repair, rehabilitation or replacement activities completed in the previous year; describing projects to be completed in the coming annual cycle; and providing an updated 10-year Capital Improvement Plan (CIP).

VII. OPTIONS FOR COORDINATION

By March 15, 2009, the City of San Mateo, Town of Hillsborough, and the District shall complete a study and submit a report that evaluates options for collaboration between the agencies on efforts to implement and comply with the requirements of this Order. This evaluation shall consider the following items:

A. Options for deploying staff, equipment, and other resources, where possible, to minimize costs to each agency and provide for efficient implementation of collection system maintenance and spill response;

B. Where applicable implement State Water Board Resolution No. 2008-0030, "Requiring Sustainable Water Resources Management;"

C. Measures to reduce energy use within the collection systems and at the wastewater treatment plant, such as energy audits of pump stations and efforts to increase water conservation (http://www.epa.gov/waterinfrastructure/bettermanagement_energy.html);

D. Coordination between the agencies on completing the condition and capacity assessments;

E. Coordination between the agencies on reaching sound engineering decisions on the most cost-effective and efficient delivery of the capital improvements needed to renew the aging sewer systems and complete the capacity improvements required by this Order; and

F. Collaboration between the agencies to develop financial plans and secure funding needed to complete the requirements of this Order.

VIII. DUE DATES FOR ANNUAL REPORTS

All of the following annual reports as required by this Cease and Desist Order are due on November 15, 2009. Refer to the respective section of the Order for the details of each annual report.

A. Sewer System Cleaning and Root Control Program (Section III.A.2)

B. Pump Station and Force Main Renovations and Upgrades (Section III.C.4)

C. Collection System Flow Monitoring (Section IV.B.2)

D. Infrastructure Renewal (Section VI.B)

IX. TIME FRAMES FOR PLAN REVIEW, APPROVAL, AND IMPLEMENTATION

Where this Order requires the submittal of a plan to the Regional Water Board, that plan shall be subject to Regional Water Board review, comment and approval. If the Regional Water Board does not approve or comment upon a plan within 60 days of receipt (or does not, in writing, extend the Regional Water Board's review for an additional 30 days), the agency submitting the plan shall implement the plan as submitted. The City of San Mateo, Town of Hillsborough, and the District shall make any revisions requested by the Regional Water Board or respond to any Regional Water Board comments by submitting a revised plan to the Regional Water Board within 30 days of receipt of the Regional Water Board comments. Upon approval by the Regional Water Board, the plans are automatically incorporated by reference as an enforceable part of this Order. All annual reports required by this Order are also subject to Regional Water Board review and approval in accordance with this paragraph.

X. REPORTING DELAYS

If any event occurs that may cause a failure to timely carry out any requirement of this Order, the agency shall notify the Regional Water Board staff in writing within ten (10) calendar days of the time the agency becomes aware of the event. The notice shall describe in detail the precise cause of the delay and measures taken to prevent or minimize the delay. The agency shall also propose a time schedule for solving the delay. The agency shall implement reasonable measures to avoid or minimize any such delay.

XI. CONSEQUENCES OF NON-COMPLIANCE

If the City of San Mateo, Town of Hillsborough, and/or the District fail to comply with the provisions of this Order, the Regional Water Board is authorized to take further action or to request the Attorney General to take appropriate actions in accordance with Water Code Sections 13331, 13350, 13385, and 13386. Such actions may include injunctive and civil remedies, if appropriate, or the imposition of administrative civil liabilities.

XII. INFORMATION SUBMITTAL

A. All submittals made pursuant to this Order shall be mailed to the following addresses:

1. San Francisco Bay Regional Water Quality Control Board
   1515 Clay Street, Suite 1400
   Oakland, CA 94612
   Attention: Sanitary Sewer Overflow Reduction Program Manager
   NPDES Wastewater Control Division

2. United States Environmental Protection Agency, Region 9
   Clean Water Act Compliance Office, Chief (WTR-7)
   75 Hawthorne Street
   San Francisco, CA 94105

B. All reports submitted pursuant to this Order shall be signed by a principal executive officer, ranking elected official or duly authorized representative of agency [as specified by 40 CFR 122.22(b)(2)] and shall include the following certification:

"I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

XIII. EFFECTIVE PERIOD

This Order is effective upon adoption, and remains in effect until rescinded by the Regional Water Board. An agency may petition the Regional Water Board to rescind the Order based on the agency's progress towards eliminating SSOs and eliminating its contribution to other agencies' SSOs or violations. The petition shall include certification by the agency that it has completed each requirement of this Order and has established programs and financial plans to assure the continued improvement of its collection system.

I, Bruce Wolfe, Executive Officer, do hereby certify that the foregoing is full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on _____, 2008.

ATTACHMENT 1: TIMETABLE OF ORDER REQUIREMENTS

January 15, 2009

II.A. Implement and Submit SSO Response Plan

March 15, 2009

III.A.1. Implement and Submit Sewer System Cleaning and Root Control Plan
III.B Submit MMS Report
III.D Submit FOG Program Report
IV.A.1. Submit Sewer Pipe/Manhole Inspection and Condition Assessment Plan
IV.A.2. Submit Initial Inspections and Condition Assessment Report
IV.B.1. Install Flow Meters
V.A. Submit Short-Term Contingency Plan
VII. Submit Collaborative Implementation Report

November 15, 2009

III.C.1. Submit Pump Station Report
III.C.2. Submit Pump Station Certification
III.C.3. Submit Pump Station Upgrade Plan

March 15, 2010

IV.A.3. Submit Inspection and Condition Assessment Progress Report
V.B.1. Submit Capacity Assurance Plan

March 15, 2011

IV.A.4. Submit Final Inspection and Condition Assessment Report
IV.B.3. Submit Capacity Assessment Report
VI.A. Submit Sewer Rehabilitation and Replacement Plan

October 31, 2013

I.C.1. Hillsborough Completes Capacity Upgrade of Crystal Springs/El Cerrito Truck Sewer
I.C.2. District Completes Eight Remaining Identified CIPs

November 15, 2013

V.B.2. Complete Short-Term Improvements

December 31, 2013

I.C.3. Complete Implementation of Recommended I/I Measures

ATTACHMENT 1: TIMETABLE OF ORDER REQUIREMENTS (cont'd)

ANNUAL REPORTS DUE EACH NOVEMBER 15, BEGINNING 2009

III.A.2	Sewer System Cleaning and Root Control Program
III.B.4	Pump Station and Force Main Renovations and Upgrades
IV.B.2	Collection System Flow Monitoring
VI.B	Infrastructure Renewal

Table 2 SSOs Reported to State and Regional Water Board

Sources of Data: State Water Board CIWQS eReporting Program Database Records (From May 2007 to March 2008), Information Submitted by Crystal Springs County Sanitation District (February 8, 2008), SF Bay Regional Water Quality Control Board - SSO eReporting Program Database Records (from Dec. 1, 2004 to May 1, 2007) and Submitted SSO Annual Reports for 2005, 2006, and 2007.

Date	Location	Gallons Discharged	Gallons Recovered	SSO Destination	SSO Cause
City of San Mateo					
7/14/2008	1624 Lodi	175	0	Storm drain	Blockage - grease
7/14/2008	3418 Shasta Dr	350	0	Surface water;Unpaved surface	Blockage - roots
7/2/2008	876 Parrott	20	0	Unpaved surface	Blockage - roots
6/20/2008	301 La Casa	40	40	Storm drain	Blockage - roots
6/20/2008	2224 South Hampton	70	70	Storm drain	Blockage - grease
5/30/2008	72 Oak Valley Rd	150	150	Storm drain	Blockage - roots
5/13/2008	4300 Camden Ave	175	175	Storm drain	Blockage - debris
5/1/2008	642 26th Ave	200	50	Street/curb and gutter;Unpaved surface	Blockage - roots
3/26/2008	3616 Kingridge	900	0	Storm drain	Blockage - roots
2/24/2008	3903 Kingridge	3,050	0	Surface water;Unpaved surface	Pipe structural problem/failure
3/24/2008	3905 Kingridge	500	0	Surface water;Unpaved surface	Blockage - roots
3/22/2008	4015 Kingridge	600	0	Surface water;Unpaved surface	Blockage - roots
3/3/2008	42nd Avenue & Midvale	1,000	800	Storm drain	Blockage - roots
2/28/2008	900 Barroilhet	150	160	Street/curb and gutter	Unknown
2/25/2008	3115 Hacienda	400	800	Storm drain	Blockage - grease
1/26/2008	1709 Shoreview	7,575	0	Surface water	Rainfall exceeded design
1/25/2008	1777 Van Buren	15,000	0	Surface water	Rainfall exceeded design
1/25/2008	24th Avenue & Flores	126,000	0	Surface water	Rainfall exceeded design
1/25/2008	27th Avenue & El Camino	336,000	0	Surface water	Rainfall exceeded design
1/25/2008	3740 El Camino Real	240,000	0	Surface water	Rainfall exceeded design
1/25/2008	2027 South Delaware	160,125	0	Surface water	Rainfall exceeded design
1/25/2008	2500 South Delaware	192,000	0	Surface water	Rainfall exceeded design
1/25/2008	29th Avenue & Juniper	93,000	0	Storm drain	Rainfall exceeded design
1/25/2008	Hillsdale & El Camino	378,000	0	Surface water	Rainfall exceeded design
1/25/2008	41st Avenue & El Camino	93,000	0	Surface water	Rainfall exceeded design
1/25/2008	Delaware & Saratoga	297,000	0	Surface water	Rainfall exceeded design
1/25/2008	3708 El Camino Real	144,000	0	Surface water	Rainfall exceeded design
1/25/2008	2000 South Norfolk	186,000	0	Surface water	Rainfall exceeded design

Date	Location	Gallons Discharged	Gallons Recovered	SSO Destination	SSO Cause
1/25/2008	70 29th Avenue	20,625	0	Surface water	Rainfall exceeded design
1/25/2008	2502 Alameda	40,500	0	Surface water	Rainfall exceeded design
1/25/2008	703 Edinburgh	21,000	0	Surface water	Rainfall exceeded design
1/25/2008	39th Avenue & Hacienda	43,875	0	Surface water	Rainfall exceeded design
1/25/2008	9th Avenue & Idaho	800	0	Surface water	Rainfall exceeded design
1/25/2008	228 24th Avenue	106,875	0	Surface water	Rainfall exceeded design
1/25/2008	East Poplar & Bayshore	66,000	0	Surface water	Rainfall exceeded design
1/16/2008	4209 Alameda	60	10	Unpaved surface	Unknown
1/4/2008	3790 El Camino Real	18,000	0	Surface water	Flow exceeded capacity
1/4/2008	2075 Norfolk	90,000	0	Surface water	Flow exceeded capacity
1/4/2008	2051 Norfolk	72,000	0	Surface water	Flow exceeded capacity
1/4/2008	39th Avenue & Beresford	7,500	0	Surface water	Flow exceeded capacity
1/4/2008	2645 South El Camino Real	2,250	0	Surface water	Flow exceeded capacity
1/4/2008	39th Avenue & Colgrove	13,500	0	Surface water	Flow exceeded capacity
1/4/2008	2077 South Delaware	84,000	0	Surface water	Flow exceeded capacity
1/4/2008	Delaware & Saratoga	126,000	0	Surface water	Flow exceeded capacity
1/4/2008	4200 South El Camino Real	36,000	0	Surface water	Flow exceeded capacity
1/4/2008	37th & El Camino Real	13,500	0	Surface water	Flow exceeded capacity
1/1/2008	20th & O'Farrell	200	400	Storm drain	Blockage - roots
12/16/2007	655 North Delaware	50	50	Street/curb and gutter	Blockage - grease
12/16/2007	143 Arbor	10	0	Street/curb and gutter	Blockage - grease
12/16/2007	2613 Isabelle	20	0	Building or structure	Blockage - roots
12/10/2007	2318 Hacienda	1,250	2,000	Storm drain	Blockage - roots
11/30/2007	343 Warren	50	75	Street/curb and gutter	Blockage - roots
11/21/2007	370 Kingridge	100	0	Unpaved surface	Blockage - roots
11/16/2007	2601 Isabelle	400	50	Storm drain	Blockage - grease
10/23/2007	Lago & Los Prados	100	800	Storm drain	Unknown
9/19/2007	2975 Norfolk	6,000	5,500	Other paved surface;Storm drain;Street/curb and gutter	Blockage - grease
6/18/2007	Arroyo Court & Dartmouth	370	5	Storm drain;Street/curb and gutter;Surface water	Blockage - Asphalt from a recent street rehab project entered sewer pipe and caused an obstruction.
6/15/2007	1555 West Hillsdale	875	0	Storm drain;Street/curb and gutter;Unpaved surface	Blockage - roots
6/14/2007	Warren & Costa Rica	300	360	Street/curb and gutter	Blockage - roots
6/4/2007	El Camino Real & Santa Inez	5	30	Street/curb and gutter	Unknown

Date	Location	Gallons Discharged	Gallons Recovered	SSO Destination	SSO Cause
6/3/2007	867 Parrott	200	200	Unpaved surface	Blockage - roots
5/11/2007	Parrott & Treetop	375	600	Storm drain;Street/curb and gutter	Blockage - roots
0/0/2007	?	<100	2 SSOs	?	?
4/21/2007	Barriolhet&Edgewood	1,375	1,500	STORM DRAIN	BLOCKAGE - roots
3/26/2007	1130 yew street	1,300	0	STORM DRAIN	BLOCKAGE - animal carcass
2/22/2007	31st&alameda	500	0	STORM DRAIN	BLOCKAGE - grease
0/0/2006	?	<100	2 SSOs	?	?
9/26/2006	2019 Parrot	875	0	STORM DRAIN	BLOCKAGE - roots
9/8/2006	228 24th ave	500	0	CAPTURED IN STORM DRAIN	BLOCKAGE - grease
9/5/2006	205 west 39th ave	500	0	STORM DRAIN	INFRASTRUCTURE FAILURE - vandalism
9/5/2006	221north el camino real	450	0	STORM DRAIN	Blockage - grease
8/18/2006	fathom dr&mariners island	8250	6000	CAPTURED IN STORM DRAIN	INFRASTRUCTURE FAILURE
3/22/2006	72 Oak Valley	650	0	STORM DRAIN	Blockage - roots
3/6/2006	2051 south norfolk	1800	900	STORM DRAIN	BLOCKAGE - mulitple causes
1/3/2006	2250 south delaware	81000	0	STORM DRAIN	FLOW CAPACITY DEFICIENCY
12/31/2005	2057 south norfolk	40500	0	STORM DRAIN	FLOW CAPACITY DEFICIENCY
12/31/2005	2051 south norflk	35000	0	STORM DRAIN	CAUSE UNKNOWN
12/31/2005	228 west 24th	9000	0	STORM DRAIN	CAUSE UNKNOWN
12/31/2005	#5 barroilhet	18000	0	STORM DRAIN	BYPASS
12/31/2005	38TH&ELCAMINO	9000	0	STORM DRAIN	CAUSE UNKNOWN
12/31/2005	SARATOGA&DELAWARE	135000	0	STORM DRAIN	FLOW CAPACITY DEFICIENCY
12/31/2005	2057 s delaware	54000	0	STORM DRAIN	CAUSE UNKNOWN
12/22/2005	saratoga &s delaware	21000	0	STORM DRAIN	FLOW CAPACITY DEFICIENCY
12/9/2005	Cutriss & 38th Ave	305	0	STREET/CURB & GUTTER	CAUSE UNKNOWN
1/3/2005	saratoga& delaware	67500	0	STORM DRAIN	FLOW CAPACITY DEFICIENCY

Crystal Springs County Sanitation District

5/18/2008	1570 Seneca Lane	100	25	Storm drain/Land	Blockage - roots
3/26/2008	45 Crown Ct	80	80	Other paved surface	Blockage - roots
3/24/2008	45 Crown Ct	90	90	Other paved surface	Blockage - roots
3/5/2008	180 Kristin	23	0	Unpaved surface	Blockage - roots
1/25/2008	Ascension & Polhemus	15,000	0	Surface water	Blockage - roots
12/22/2007	1250 Parrott Dr	650	0	Unpaved surface	Grit/Debris/Grease Blockage

Date	Location	Gallons Discharged	Gallons Recovered	SSO Destination	SSO Cause
11/23/2007	Ascension & Los Altos	35	35	Other paved surface	Blockage - roots
6/13/2007	1432 Bel Aire	100	0	Unpaved surface	Blockage - roots
3/6/2007	1354 Enchanted	20	Not Known	Unknown	Blockage - roots
1/17/2007	1354 Enchanted	20	Not Known	Unknown	Blockage - roots
12/16/2006	1426 Lexington	10	Not Known	Unknown	Blockage - roots
11/18/2006	1624 Ascension	600	0	Yard/Land	Blockage - grease
11/18/2006	500 Polhemus	600	0	Yard/Land	Root/Debris Blockage
10/20/2006	1428 Rainbow	65	Not Known	Unknown	Blockage - roots
8/21/2006	Ascension & Polhemus	500	0	Yard/Land	Infrastructure Failure
7/25/2006	1730 Los Altos	60	Not Known	Unknown	Blockage - roots
4/16/2006	1359 Enchanted	70	Not Known	Unknown	Blockage - roots
1/17/2006	1735 Randall	35	Not Known	Unknown	Blockage - roots
10/23/2005	525 Polhemus	500	0	Yard/Land	Blockage - roots
4/12/2005	201 Polhemus	5	Not Known	Unknown	Blockage - roots
4/11/2005	65 Mountain View	50	Not Known	Unknown	Blockage - roots
1/18/2005	1735 Randall	150	0	Yard/Land	Blockage - roots
Town of Hillsborough					
7/6/2008	2235 Ralston Ave	600	250	Storm drain	Blockage - grease
6/23/2008	775 Bowhill Rd	10	0	Street/curb and gutter	Blockage - grease
6/9/2008	80 Del Monte Dr	150	75	Storm drain	Blockage - swifter towels
5/12/2008	601 Hillsborough Blvd	3	0	Unpaved surface	Blockage - roots
4/14/2008	550 Remillard Drive	20	0	Unpaved surface	Blockage - roots
3/17/2008	728 El Cerrito	5	0	Other paved surface	Blockage - roots
3/8/2008	669 Hayne	50	50	Storm drain	Blockage - grease
3/4/2008	15 Cottonwood	210	0	Unpaved surface	Blockage - swifter towels, clogging mouth of channel
2/3/2008	750 El Cerrito	18,000	0	Storm drain	Flow exceeded capacity
2/3/2008	777 El Cerrito	9,600	0	Storm drain	Flow exceeded capacity
1/25/2008	1200 Hayne	21,000	0	Storm drain	Flow exceeded capacity
1/25/2008	1600 Floribunda	20,000	0	Storm drain	Flow exceeded capacity
1/25/2008	750 El Cerrito	33,000	0	Storm drain	Flow exceeded capacity
1/25/2008	766 El Cerrito	33,000	0	Storm drain	Flow exceeded capacity
1/25/2008	777 El Cerrito	115,000	0	Storm drain	Flow exceeded capacity

Date	Location	Gallons Discharged	Gallons Recovered	SSO Destination	SSO Cause
1/25/2008	1020 Crystal Springs	122,000	0	Storm drain	Flow exceeded capacity
1/25/2008	1050 Crystal Springs	122,000	0	Storm drain	Flow exceeded capacity
1/25/2008	2290 Skyfarm	1,923,000	0	Sewer main is submerged from creek inlet being clogged, which has formed a lake.	Creek inlet plugged up causing a lake to form and submerged sewer main by about 15' of water. Main could not handle all the creek water and caused manhole's to back up.
1/5/2008	1050 Crystal Springs	21,000	0	Surface water	Flow exceeded capacity
1/5/2008	777 El Cerrito	5,250	0	Surface water	Flow exceeded capacity
1/5/2008	766 El Cerrito	5,250	0	Surface water	Flow exceeded capacity
1/5/2008	750 El Cerrito	5,250	0	Surface water	Flow exceeded capacity
1/4/2008	105 Braemar	175	0	Unpaved surface	Blockage - roots
1/4/2008	766 El Cerrito	2,700	0	Surface water	Flow exceeded capacity
1/4/2008	777 El Cerrito	13,500	0	Storm drain	Flow exceeded capacity
1/4/2008	1050 Crystal Springs Rd.	100,000	0	Surface water	Flow exceeded capacity
1/4/2008	1020 Crystal Springs Rd.	100,000	0	Surface water	Flow exceeded capacity
1/4/2008	1600 Floribunda Ave	18,000	0	Storm drain	Flow exceeded capacity
1/4/2008	750 El Cerrito	2,700	0	Surface water	Flow exceeded capacity
12/18/2007	750 El Cerrito	750	700	Paved Surface	Blockage - debris
12/10/2007	40 Shady Lane	420	100	Building or structure	Blockage - roots
11/28/2007	610 Pullman Dr.	100	0	Storm drain	Blockage - roots
10/26/2008	2400 Skyfarm	265	0	Unpaved surface	Blockage - roots
9/18/2007	5 Cottonwood Court	150	0	Unpaved surface	Blockage - grease
7/22/2007	350 El Portal Rd.	75	0	Other paved surface	Blockage - roots
6/21/2007	105 Denise Rd.	210	0	Unpaved surface	Blockage - roots
5/29/2007	2415 Skyfarm Drive	1,500	0	Unpaved surface	Blockage - roots
5/14/2007	2375 Skyfarm Dr.	960	0	Storm drain	Blockage - cleaning rags
5/9/2007	40 Bluebell	350	0	Unpaved surface	Blockage - roots
4/14/2007	840 Hillsborough blvd	20,000	0	STORM DRAIN	Blockage - roots
3/25/2007	20 Glengarry Way	150	0	STORM DRAIN	Blockage - roots
3/14/2007	736 Jacaranda Circle	300	0	YARD/LAND	Blockage - debris
2/26/2007	Across from 2600 Ralston	475	0	STORM DRAIN	Blockage - mulitple causes
2/26/2007	942 Baileyana Rd.	90	0	STORM DRAIN	Blockage - debris from laterals
2/26/2007	1600 Floribunda Ave.	6,000	0	STORM DRAIN	INFLOW & INFILTRATION
1/24/2007	940 Jackling Dr.	150	0	STORM DRAIN	Blockage - roots

Date	Location	Gallons Discharged	Gallons Recovered	SSO Destination	SSO Cause
11/27/2006	25 Mosswood	150	0	YARD/LAND	Blockage - roots
10/10/2006	2165 Edge Court	210	0	YARD/LAND	Blockage - grease
10/1/2006	1208 Kenilworth	250	0	YARD/LAND	Blockage - grease
7/17/2006	1208 Kenilworth	125	0	YARD/LAND	Blockage - debris
7/7/2006	1110 Hayne Rd.	175	0	STREET/CURB & GUTTER	Blockage - roots
7/6/2006	Easement behind 35 Citrus Ct.	210	0	YARD/LAND	Blockage - debris from laterals
6/26/2006	17 Stonepine Ct.	250	0	YARD/LAND	Blockage - grease
5/1/2006	1130 Tartan Trail (easement)	275	0	YARD/LAND	Blockage - roots
3/16/2006	55 Berryessa Way	200	0	STORM DRAIN	Blockage - roots
1/24/2006	Easement of 2289 Forestview.	225	0	YARD/LAND	Blockage - debris
1/20/2006	1015 Macadamia	10	0	STREET/CURB & GUTTER	Blockage - roots
12/23/2005	5 Mountainwood Ln.	3000	0	STORM DRAIN	Blockage - vandalism
12/22/2005	766 El Cerrito Rd	30000	0	STORM DRAIN	FLOW CAPACITY DEFICIENCY
11/16/2005	101 Bay Wood	200	0	YARD/LAND	Blockage - grease
8/5/2005	18 Farm Lane	110	0	YARD/LAND	Blockage - grease
8/2/2005	2335 Oakdale Road	320	320	CAPTURED IN STORM DRAIN	Blockage - roots
6/14/2005	726 Jacaranda rd.	350	0	YARD/LAND	Blockage - grease
6/8/2005	1305 Tartan trail	240	0	STORM DRAIN	Blockage - grease
3/30/2005	20 Cinnamon Court	50400	0	YARD/LAND	Blockage - roots
3/7/2005	720 Chateau	750	0	STORM DRAIN	Blockage - roots
2/15/2005	Crystal Springs Road & Merner Rd.	198000	0	STORM DRAIN	FLOW CAPACITY DEFICIENCY
2/8/2005	145 Stonepine Road	200	0	YARD/LAND	Blockage - roots
1/10/2005	75 Rowen Tree Court	300	0	YARD/LAND	Blockage - roots
1/5/2005	750 Endfield	40	0	YARD/LAND	Blockage - roots
12/9/2004	951 Baileyanna Rd.	30	0	STREET/CURB & GUTTER	Blockage - roots