# ATTACHMENT B

## SUPPLEMENTAL ENVIRONMENTAL PROJECT

## Private Lateral Replacement Grant Program

Sanitary District No. 1 of Marin County, also known as Ross Valley Sanitary District

Supplemental Environmental Project (SEP) (1 of 2)

| A. Project Name: |
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| Private Lateral Replacement Grant Program (PLRGP) |
| B. Project Developed by: |
| Sanitary District No. 1 of Marin County (District) |
| C. Project to be Performed by: |
| Sanitary District No. 1 of Marin County |
| D. Contact: |
| Mr. Brett Richards, General Manager<br>Sanitary District No. 1 of Marin County<br>2960 Kerner Boulevard<br>San Rafael, CA 94901<br>Telephone: 415-259-2949<br>Fax: 415-460-2149<br>Email: BRichards@rvsd.org |
| E. Compliance with SEP Criteria: |
| 1. **Benefit to Water Quality and Beneficial Uses**. The PLRGP will reduce inflow and infiltration (I&I) into the District's collection system from defective private sewer laterals. A reduction in I&I entering the District's collection system will benefit surface water quality and beneficial uses by decreasing the potential for spills of untreated sewage from the District's system to surface waters during wet weather. In addition, the program should reduce the number and volume of private spills to surface waters from defective laterals.<br>2. **SEP is not an Obligation of Discharger.** The District has not been required to develop, implement or fund the PLRGP by any permit or order or any local, state or federal law.<br>3. **No Fiscal Benefit to Water Board.** The PLRGP does not provide any fiscal benefit to the Regional Water Quality Control Board's (Regional Water Board) functions, its members or its staff.<br>4. **Nexus Between Violation and SEP.** A nexus exists between the District's |

spill violations and the PLRGP because repair or replacement of defective private laterals will reduce the amount of I&I entering the District's collection system from these laterals, thereby reducing the likelihood of future wet weather spills from the District's system. In addition, repair or replacement of defective private laterals should reduce the number of private lateral spills and their related consequences.

5. **Plans to continue or maintain the SEP beyond the SEP**-funded period: There are no plans to continue the PLRGP after the SEP-funded period.

F. Description of Project:

1. **Goals of the SEP and detailed plans for achieving the goals**. The goals of the PLRGP are (1) to provide incentives to property owners to replace private laterals and thereby reduce the I&I entering the District's collection system; and (2) to focus private lateral repairs in basins with the greatest I&I. The District will achieve these goals by making grant funds available for private lateral replacements with the objective of accomplishing the performance measure standards described in the following section.

2. **Project Overview.** District funds will be allocated to include, but not be limited to, subsidizing the replacement of defective private laterals. Emphasis will be placed on private laterals in basins that are determined from the District's flow monitoring program to have the highest levels of I&I (presuming laterals and sewers in the same location will contribute similar levels of I&I).

   A description or map showing these high I&I basins will be provided in the first quarterly report due to the Regional Board and updated and/or revised as necessary in each subsequent quarterly report.

3. **Project Description**.

   a. The District will encourage or conduct CCTV inspection of the private lateral by a District-qualified contractor.

   b. If the CCTV inspection results qualify the private lateral for replacement, the private property owner will be reimbursed in part or in whole for the cost of the CCTV inspection.

   c. In addition, when the District replaces a mainline sewer in a sewer basin that has been identified in the prior quarterly report as having high I&I, the District will further motivate the homeowner to conduct a CCTV inspection of the private lateral by paying for the cost of inspection even if the inspection determines that the lateral does not require replacement.

   d. The property owner seeking grant funds will complete a PLRGP application and submit the application to the District in conjunction with a DVD of the lateral inspection.

   e. If the CCTV inspection identifies one or more defects in the private

lateral that qualify the lateral for District funding, the District will direct the homeowner to replace the private lateral within a certain period of time using an independent contractor. The District will provide a list of contractors for the homeowner's reference.

f. For laterals requiring replacement that are associated with mainline sewers described in (c) above, the District will replace the portion of the lateral within the public right of way as part of the District's mainline sewer replacement project. The District's cost to replace the lower lateral will be recorded as a District LRGP expenditure but will not be deducted from the homeowner's PLRGP or counted towards this PLRGP SEP allotment. The homeowner will remain responsible for replacing the portion of the private lateral within private property as described in (e), above.

g. The homeowner and their contractor will properly permit the work and obtain inspection by the District in compliance with terms of the permit.

h. The homeowner will submit a copy of the contractor's invoices, paid in full, to the District.

i. Upon the contractor's satisfactory completion of the work, the District will reimburse the homeowner in an amount deemed appropriate by the District to achieve the performance measures described below.

G. Key Personnel Involved in SEP:

The District's management, engineering and maintenance staff will develop and implement the PLRGP.

H. Project Milestones and Budget:

The District will fund the PLRGP in the amount of $482,380. This amount, when added to the proposed cost of the additional proposed SEP, results in a total amount of $731,750, which is half of the total adjusted monetary assessment of the District's liability under the Regional Water Board's enforcement action.

The PLRGP will include the following milestones, measured from the effective date of the enforcement action:

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| 2 months | Develop an outreach program informing homeowners about the PLRGP. The District, in its outreach materials, will state in a prominent manner that the PLRGP is part of the settlement of an enforcement action by the Regional Water Board against the District. |
| 4 months | Implement outreach program |
| 6 months | Submit report to the Regional Water Board on implementation of the outreach program |

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| Ongoing | Submit quarterly status reports as further described below in the section entitled "Reports to the Regional Water Quality Control Board" on or before the following dates: |

| **2012** | **2013, 2014, and 2015** | **2016** |
|---|---|---|
| October 20 | January 20<br>April 20<br>July 20<br>October 20 | January 20<br>April 20<br>July 20 |

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| November 1, 2016 | Submit final report and certification of completion documenting completion of the SEP, and addressing how performance measures were met, along with a copy of accounting measures of expenditures. |
| Ongoing | Maintain a monthly accounting of grant funds. |

I. Project Performance Measures:

1. The District will measure the success of the PLRGP by tracking the number, length, location, and cost of replacements of defective private laterals.
2. Suspension of $482,380 in administrative civil penalty will be suspended pending successful completion of the program that equates to the satisfactory repair or replacement of a total of 283 defective private sewer laterals and compliance with the SEP provisions in the Settlement Agreement for this matter, which include the requirement that the District demonstrate that it has expended a minimum of $482,380 to implement the SEP project.
3. If the program results in fewer than 283 private laterals repaired or replaced, the final suspended amount shall be the number of lateral repaired or replaced multiplied by $1,700.
4. The District shall pay any difference between $482,380 and the final suspended amount to the State Cleanup and Abatement Account.

J. Reports to the Regional Water Quality Control Board:

The District will provide a quarterly progress report to the Regional Water Board's designated representative, the oversight organization, and the Division of Financial Assistance of the State Water Board in accordance with the schedule set forth in the Project Milestones and Budget section above.

1. Each report shall include a table showing:
   a. The number and length of laterals replaced for the period, and from the beginning of the program
   b. The street address locations for each inspected lateral
   c. The street address for each replaced lateral
   d. The month and date the inspection and/or the repair was completed

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| e. The amount of grant funds expended on each lateral replacement<br>f. The amount of grant funds remaining after each lateral replacement is funded<br>g. A summary of outreach conducted and copies of any supporting materials for the program<br>2. The District will provide by the due date set forth in the Project Milestones and Budget section above, a final report and certification of completion in accordance with the Settlement Agreement for this matter. |
| K. Third Party Oversight Organization: |
| To ensure completion of commitments and appropriate expenditure of funds, oversight and audit of the project will be conducted by the San Francisco Estuary Partnership (SFEP). |