



**Standard Operating Guideline**

**Sewer Backup and Response**

District Name:

Date Prepared: Date Revised:

**OBJECTIVE**

This Standard Operating Guideline (SOG) is intended to provide guidance for JPIA Members who operate and maintain wastewater and sewer collection systems. Each District should establish, by ordinance or regulation, the limits of their responsibility for the maintenance, inspection, and repair of mainlines, service laterals, cross-connections, and other related wastewater facilities.

**RATIONALE/PURPOSE**

Sewer backups and line breaks will occur. It is the intention of the JPIA and its members to handle claims effectively, minimize resultant damage, and control the cost of any claim. Effective risk management includes a clear assignment of responsibility, routine inspection, proper maintenance, and quick emergency response. The responsibility to inspect, maintain, and repair should be clearly defined by ordinance or regulation.

**METHODS/PROCEDURES**

A property owner’s sewer system or service lateral is connected to larger main lines. Service laterals are installed on private property and run to a point of connection on a larger mainline in an easement or public street. The JPIA recommends that members review their sewer use agreements and reminds them to evaluate whether a sewer pipe blockage program is needed to control fats, oils, grease, rags, and debris. It should be the responsibility of the property owner to maintain, inspect, and repair the sewer lateral in accordance with the District’s ordinance or regulation.

**Once a sewer spill is reported or discovered, the District shall work to determine the cause and responsibility of the spill.** When related to District-owned facilities, crews should follow established procedures to:

* Protect property, streets, storm drain systems, and public areas from damage.
* Contain, collect, and properly dispose of wastewater.
* Identify strategies for containment based on typical circumstances, locations, spill category, and available material.
* Ensure staff and contractors follow the District’s Sanitary Sewer Emergency Response Plan.
* Notify primary responders, local officials, and regulatory agencies, as required.
* Complete an investigation and report possible claims to the JPIA in a timely manner.
* Document cleanup and corrective actions taken (see [Onsite Sewer Backup Incident Assessment Form](https://www.acwajpia.com/wp-content/uploads/ONSITE_SEWER_BACKUP_INCIDENT_ASSMT.docx)).

**This model form/template must be customized to meet your Agency’s needs.**

When the cause of a sewer spill does not appear to be the responsibility of the District:

* The District shall inform the property owner/tenant that the initial determination is that the cause is not related to District-owned or maintained lines or facilities.
* Provide property owner/tenant with a copy of the District’s Sewer Spill Reference Guide (Information for Residents and Property Owners, and Coping with a Sewer Backup resources can be found in the [JPIA Sample Sewer Backup Reduction Program](https://www.acwajpia.com/wp-content/uploads/SOG-Sewer_Backup_Reduction_Program.docx)).
* Document all evidence that the cause is not due to the responsibility of the District through the use of the [Onsite Sewer Backup Incident Assessment Form](https://www.acwajpia.com/wp-content/uploads/ONSITE_SEWER_BACKUP_INCIDENT_ASSMT.docx). Include any photographs, diagrams, or supporting documentation.
* Keep copies of all documents and information for at least two years. Forward copies to the JPIA upon request.

**SAFETY CONSIDERATIONS**

Sewer spills can cause safety and health hazards, property damage, and threaten the environment, local waterways, and beaches. No cleanup or repair work should begin without consideration for employee safety and spill containment. Emergency Response Crews should:

* Be trained on the District’s Sanitary Sewer Emergency Response Plan.
* Address emergency system operations to protect life safety, property, public health and the environment.
* Be trained in controlling operational hazards, including Personal Protective Equipment (PPE), traffic control, and the equipment to be used.
* Ensure that no open trenches and/or confined spaces are entered unless all pre-entry checklists and permits are completed and reviewed by the supervisor on-site.

**COST-BENEFIT**

Districts allocate necessary resources to their sewer management program for spill responses, system operation, maintenance, and repair. The proper assignment of responsibility, prompt response, professional handling of incidents, complete investigation, and documentation of the incident can significantly impact the outcome and cost of claims for the District and the JPIA pool.

**REPORTING AND DOCUMENTATION**

The SSO report collects detailed information on a specific overflow event. Districts are required to report all SSOs that result from a failure in any portion of a sanitary sewer system under their management. For the purposes of reporting, SSOs fall into one of four categories:

| [SPILL CATEGORIES](https://www.waterboards.ca.gov/water_issues/programs/sso/) | |
| --- | --- |
| **CATEGORY 1** | A Category 1 spill is a spill of any volume of sewage from or caused by a sanitary sewer system that results in a discharge to:   * A surface water, including a surface water body that contains no flow or volume of water; or * A drainage conveyance system that discharges to surface waters when the sewage is not fully captured and returned to the sanitary sewer system or disposed of properly.   *A spill from a District-owned and/or operated lateral that discharges to a surface water is a Category 1 spill* |
| **CATEGORY 2** | A Category 2 spill is a spill of 1,000 gallons or greater, from or caused by a sanitary sewer system that does not discharge to a surface water.  *A spill of 1,000 gallons or greater that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system, is a Category 2 spill.* |
| **CATEGORY 3** | A Category 3 spill is a spill of equal to or greater than 50 gallons and less than 1,000 gallons, from or caused by a sanitary sewer system that does not discharge to a surface water.  *A spill of equal to or greater than 50 gallons and less than 1,000 gallons, that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 3 spill.* |
| **CATEGORY 4** | A Category 4 spill is a spill of less than 50 gallons, from or caused by a sanitary sewer system that does not discharge to a surface water.  *A spill of less than 50 gallons that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 4 spill.* |

If a District either (1) does not have any SSOs in a calendar month or (2) only Category 4, and/or non-category 1 lateral spills, they are required to complete a “No-Spill” or a “Category 4 Spills” and/or “Non-Category 1 Lateral Spills” certification statement in the CIWQS Sanitary Sewer System Database.

SSO information reported by Districts includes the location of the overflow, the volume of sewage spilled, and the cause of the overflow. AAfter certifying any spill report, the District should maintain documentation containing the following information for each spill.

* CIWQS-certified reports.
* Field Incident and Assessment Reports, including:
  + Incident correspondence and field notes,
  + Customer interviews.
* Estimate calculations of spilled and recovered amounts.
* Diagrams and/or maps showing the spill location.
* Photographs of the spill and the surrounding location.
* Water quality sampling and test results (if applicable).
* Signage posting diagrams and photos (if applicable).

Other related reporting and inspection forms, checklists, and documentation resources include:

* [Sample Sewer Backup Reduction Program (SOG)](https://www.acwajpia.com/wp-content/uploads/SOG-Sewer_Backup_Reduction_Program.docx)
* [Onsite Sewer Backup Incident Assessment](https://www.acwajpia.com/wp-content/uploads/ONSITE_SEWER_BACKUP_INCIDENT_ASSMT.docx)
* [Sanitary Sewer Overflow Report – Public System](https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main)

**REFERENCES**

Robert Greenfield, General Counsel. (September/October 2019). [California Supreme Court Issues Two Opinions Favorable To Public Entities](https://www.acwajpia.com/wp-content/uploads/2019/09/perspective1909.pdf), *Perspective,* Vol. 40 No. 5, page 3.

Statewide Sanitary Sewer General Order – Effective June 5, 2023

<https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0103-dwq.pdf>