CITY OF LATHROP
Sewer System Management Plan

June 2025

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List of Abbreviations and Acronyms

ADWF	Average Dry Weather Flow
ARV	Air/Vacuum Release Valves
Cal OES	California Office of Emergency Services
CCTV	closed circuit television
CIP	capital improvement project
CIWQS	California Integrated Water Quality System
CTF	Consolidated Treatment Facility
d/D	depth to diameter
FOG	Fats, Oils and Grease
FSE	Food Service Establishment
GIS	geographical information system
gpd/du	gallons per day per dwelling unit
gpd/ac	gallons per day per acre
GWDR	General Waste Discharge Requirements
I&I	infiltration and inflow
I-205	Interstate 205
I-5	Interstate 5
IPP	Industrial Pretreatment Program
IWRMP	Integrated Water Resources Master Plan
LMC	Lathrop Municipal Code
LRO	legally responsible official
LS	lift station
MWQCF	Manteca Water Quality Control Facility
NPDES	National Pollutant Discharge Elimination System
O&M	Operations & Maintenance
OPC	Opinion of Probable Cost
POTW	publicly owned wastewater treatment plant
PS	pump station
PWD	Public Works Department
PWWF	Peak Wet Weather Flow
RWQCB	Regional Water Quality Control Board

SCADA	Supervisory Control and Data Acquisition
SERP	Spill Emergency Response Plan
SR-120	State Route 120
SSMP	Sewer System Management Plan
SSOs	sewer system overflow
SWRCB	State Water Resources Control Board
VWNA	Veolia Water, North America
WWSMP	Wastewater System Master Plan

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INTRODUCTION

This introductory section provides background information on the purpose and organization of this City of Lathrop (City) Sewer System Management Plan (SSMP) and provides a brief overview of the City's service area and sewer system.

SSMP Requirement Background

This SSMP has been prepared and updated to comply with the requirements contained in State Water Resources Control Board (SWRCB) General Order No. 2022-0103-DWQ, adopted on December 6, 2020 and effective June 5, 2023. This General Order reissued the General Waste Discharge Requirements originally established under Order No. 2006-0003-DWQ and includes updates to clarify protection of both surface and groundwaters of the State, address climate change impacts, and expand electronic reporting requirements.

This SSMP was originally adopted in July 2009 and was updated in 2013, 2018, 2022 and 2023. A history of changes and amendments to the SSMP since the City's first adoption in 2009 is included in the SSMP Change Log in Appendix G.

Document Organization

This SSMP includes eleven elements, as listed below and required in the General Order. Each of these elements forms a section of this document.

1. Sewer System Management Plan Goal and Introduction
2. Organization
3. Legal Authority
4. Operation and Maintenance Program
5. Design and Performance Provisions
6. Spill Emergency Response Plan
7. Blockage Control Program
8. System Evaluation, Capacity Assurance, and Capital Improvements
9. Monitoring, Measurement, and Program Modifications
10. Internal Program Audits
11. Communication Plan

Each element section is organized into sub-sections, as follows:

- Description of the regulatory requirements for that element, included italicized font in grey text boxes at the beginning to each element;
- Identification of associated appendix and list of supporting information included in the appendix; and
- Discussion of the element. The discussion may be split into multiple sub-sections depending on length and complexity.

Supporting information for each element is included in an appendix associated with that section, as applicable. In general, information expected to require relatively frequent updates (such as names and phone numbers of staff) are included in appendices, as well as other supporting information, such as forms or schedules.

ELEMENT 1: SEWER SYSTEM MANAGEMENT PLAN GOAL AND INTRODUCTION

The summarized requirements for the Goals element of the SSMP are as follows:

1.1 Regulatory Requirements for Goals Element

***D.1. Goals**: The goal of the SSMP is to provide a plan and schedule to: (1) properly manage, operate, and maintain all parts of the Enrollee's sanitary sewer system(s), (2) reduce and prevent spills, and (3) contain and mitigate spills that do occur.*

***D.1.1. Regulatory Context**: The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates.*

***D.1.2. SSMP Update Schedule:** The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of sewer spills.*

***D.1.3. Sewer System Asset Overview:** The Plan Introduction section must provide a description of the Enrollee-owned assets and service area, including but not limited to:*

- *Location, including county(ies);*
- *Service area boundary;*
- *Population and community served;*
- *System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons;*
- *Structures diverting stormwater to the sewer system;*
- *Data management systems;*
- *Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals;*
- *Estimated number or percent of residential, commercial, and industrial service connections; and*
- *Unique service boundary conditions and challenge(s).*

Additionally, the Plan Introduction section must provide reference to the Enrollee's up-to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment.

1.2 Element 1 Appendix

Supporting information for Element 1 is included in Appendix C. This appendix includes the following documents:

1. Figure C-1. City of Lathrop Wastewater Infrastructure
2. Figure C-2. City of Lathrop Sewer Collection Systems and Pump Station Drainage Areas

1.3 Goals Discussion

In support of this SSMP, the City has developed the following goals to properly manage, operate and maintain its sewer system:

1. To properly manage, operate, and maintain all portions of the City's sewer system.
2. To prevent public health hazards.
3. To meet all applicable regulatory notification, monitoring, and reporting requirements.
4. Use funds available for sewer operations in the most efficient manner by performing preventative maintenance and extending the useful life of the sewer system.
5. Convey wastewater to treatment facilities with a minimum of infiltration, inflow, and exfiltration.
6. Provide adequate capacity to convey peak wastewater flows.

This SSMP will contribute to the proper management of the collection system and assist the City in preventing public health hazards due to sanitary sewer overflows (SSOs) by providing guidance for appropriate maintenance, capacity management, and emergency response.

1.4 Update Schedule

The General Order requires every local public sewer collection system agency to develop an SSMP and update it every six years. An SSMP Audit must be conducted at least once every three years and further discussed in Element 10. The City's current required SSMP update is due on 2 August 2025 under the new SWRCB general order. A history of changes and amendments to the SSMP since the City's first adoption in 2009 is included in the SSMP Change Log in Appendix G.

- **Current SSMP Update:** 2 August 2025
- **Next Audit Start Date:** 2 August 2028
- **Next Audit Due Date:** 2 February 2029
- **Next SSMP Update:** 2 August 2031

1.5 Asset Overview

The City is located 70 miles east of San Francisco in San Joaquin County. It is located at the interchange of three major freeways: Interstate 5 (I-5), Interstate 205 (I-205), and State Route 120 (SR-120). The City of Lathrop is located nearby or adjacent to unincorporated areas of San Joaquin County and the City of Stockton towards the north, the City of Manteca towards the east, the City of Tracy towards the south, and the San Joaquin –

Sacramento River Delta towards the west. The City has an area of 21 square miles of level terrain, and a population of 38,596 in January 2025[1].

The City's wastewater is conveyed by two separate collection systems to two publicly owned wastewater treatment plants (POTWs) that are operated under two separate permits administered by the RWQCB:

1. Collection system "Lathrop CTF Collection System" (WDID 5SSO10985), which conveys wastewater from the Crossroads industrial area and the areas west of I-5, including the Mossdale, River Islands, and Central Lathrop areas to the Lathrop Consolidated Treatment Facility (LCTF, formerly known as WRP-1);
2. Collection system "Lathrop CS to MWQCF CS" (WDID 5SSO10897), which conveys wastewater from areas east of I-5 that are not part of the Crossroads industrial area to the Manteca Water Quality Control Facility (MWQCF).

Wastewater generated in the Crossroads industrial area previously was treated at the Crossroads wastewater treatment facility, which was decommissioned in 2015 and is now combined with the CTF. The CTF produces tertiary treated recycled water that is stored in recycled water storage ponds and distributed to either designated land application areas, City owned parks, landscaping, or discharged to the San Joaquin River. In February 2022, the RWQCB approved a National Pollutant Discharge Elimination System (NPDES) permit to discharge the CTF effluent to the San Joaquin River. Discharge to the San Joaquin River began in February 2024.

The City's wastewater collection system consists of approximately 102.2 miles of gravity mains, 23.6 miles of force mains, as well as 15 lift and pump stations. The City has a supervisory control and data acquisition (SCADA) system for control and monitoring of facilities.

[1] California DOF 2025. E-1 Population Estimates for Cities, Counties, and the State — May 1, 2025.

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ELEMENT 2: ORGANIZATION

This section of the SSMP identifies City staff who are responsible for implementing this SSMP, responding to SSO events, and meeting the SSO reporting requirements. This section also includes the designation of the Authorized Representative to meet SWRCB requirements for completing and certifying spill reports.

2.1 Regulatory Requirements for Organization Element

> ***D.2. Organization**: The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organization chart or similar narrative documentation that includes:*
>
> *• The name of the Legally Responsible Official as required in section 5.1 (Designation of a Legally Responsible Official) of this General Order;*
>
> *• The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan elements;*
>
> *• Organizational lines of authority; and*
>
> *• Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. (For example, county health officer, county environmental health agency, and State Office of Emergency Services.)*

2.2 Element 2 Appendix A

Supporting information for Element 2 is included in Appendix A. This appendix includes the following documents:

1. Figure A-1. Organization Chart of Wastewater Utility Staff
2. Description of General Responsibilities for Wastewater Utility Staff
3. Table A-1. Names and Telephone Numbers of Staff Responsible for SSMP
4. Table A-2. List of Staff Responsible for SSMP Elements

2.3 Organization Discussion

This section discusses the organization and roles of wastewater utility staff, the authorized representative to the SWRCB, and key staff responsible for implementing and maintaining the SSMP.

Department Organization

The organization chart for the management, operation, and maintenance of the City's wastewater collection system is shown on Appendix A, Figure A-1. The names and phone numbers of staff filling these positions are included in Appendix A, Table A-1.

Description of General Responsibilities

Descriptions of Public Works Department (PWD) staff responsibilities are included in Appendix A.

The PWD Utilities Division (Utilities) have the lead responsibility for the operation and maintenance of the collection system. Utilities staff have the primary responsibility to respond to, clean up, and document SSOs from the collection system, including from lift and pump stations. The City's Compliance Engineer has primary responsibility to log all documentation of any SSOs and assist the City's authorized representatives in providing any necessary agency notifications. Contract operators (i.e., Veolia Water, North America [VWNA]) at CTF are responsible for monitoring the quality and quantity of water generated and received at the plant.

The PWD Engineering Division have the primary responsibility in planning, design, and construction of the collection system's Capital Improvement Projects (CIPs). The Compliance Engineer assists with managing the City's compliance programs and regulatory permits including this Sanitary Sewer System General Order and others. The Senior Construction Inspector is responsible for ensuring the new and rehabilitated assets meet the City's standards.

Authorized Representative

The City's authorized representative in all wastewater collection system matters is the Public Works Director or their designee. The Public Works Director or their designee is authorized to certify electronic spill reports submitted to the RWQCB via the California Integrated Water Quality System (CIWQS) and is a legally responsible official (LRO). As the LRO, the Public Works Director or their designee, shall possess a recognized degree related to operations and maintenance of sanitary sewer systems, and have professional training and experience related to the management of sanitary sewer systems.

The Utilities Superintendent has also been designated as an LRO who can certify electronic SSO reports in CIWQS. Multiple LROs ensure the City has continuous LRO coverage.

Additional PWD Engineering and Administrative staff are authorized to submit SSO reports to the appropriate government agencies and are designated as "Data Submitter" in the CIWQS system.

Responsibility for SSMP Implementation

Description of general responsibilities for City staff for implementing specific measures in the SSMP program are provided in Appendix A, Table A-2.

2.4 SSO Reporting Chain of Communication

The chain of communication for reporting SSOs is included in the City's Spill Emergency Response Plan (SERP) in Appendix D. The Compliance Engineer has the lead responsibility for reporting SSOs to the appropriate regulatory agencies, with assistance from Utilities staff and Administrative staff.

Officials receiving immediate notification of the SSO vary depending on the size of the spill and whether or not the spill contains hazardous materials, affects surface waters, or

has the potential to impact human health. Table 2-1 lists these officials and the circumstances under which they are notified immediately. Detailed notification procedures are described in Section VII of the SERP.

TABLE 2-1
OFFICIALS RECEIVING IMMEDIATE NOTIFICATION OF SSO

Contact	Circumstance for Immediate Notification
Utilities Superintendent	All SSOs.
Compliance Engineer	All SSOs.
Assistant City Manager (acting Public Works Director)	Major SSOs (greater than 1,000 gallons), or those affecting surface water or human health.
City Manager	Major SSOs (greater than 50,000 gallons), or those affecting surface water or human health.
California Office of Emergency Services (within 2 hours)	Major SSOs (greater than 1,000 gallons), or those affecting surface water or human health.
Regional Water Quality Control Board (within 72 hours)	Major SSOs (greater than 1,000 gallons), or those affecting surface water or human health. (SSO Categories 1 and 2)
Lathrop Manteca Fire Department	SSOs involving hazardous materials.
San Joaquin County Department of Environmental Health	SSOs that may impact human health.
State Water Resources Control Board, Division of Drinking Water	SSOs affecting the City's Drinking Water System or water supplies.
California Department of Fish and Wildlife	SSOs causing a fish kill.
South San Joaquin Irrigation District	SSOs resulting in a discharge into the South San Joaquin Irrigation District Canal.

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ELEMENT 3: LEGAL AUTHORITY

This element of the SSMP discusses the City's Legal Authority, including its Municipal Code and agreements with other agencies. This section fulfills the Legal Authority requirement of the SWRCB (Element 3)

3.1 Regulatory Requirements for Legal Authority Element

The requirements for the Legal Authority element of the SSMP (Element 3) are summarized below:

> ***D.3. Legal Authority:*** *The Plan must include copies or an electronic link to the Enrollee's current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority to:*
>
> *• Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that may cause blockages;*
>
> *• Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure;*
>
> *• Require that sewer system components and connections be properly designed and constructed;*
>
> *• Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee;*
>
> *• Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures; and*
>
> *• Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.*

3.2 Element 3 Appendix B

Supporting information for Element 3 is included in Appendix B. This appendix includes the following documents:

1. Industrial Pretreatment Program (IPP) Enforcement Response Plan
2. Enforcement Response Plan – Fats, Oils & Grease Source Control Program
3. Interjurisdictional Agreement Between the City of Manteca and The City of Lathrop.

3.3 Municipal Code

The legal authority required for the SSMP by the SWRCB is contained within the City's municipal code. Two chapters of the municipal code are dedicated to the sewer system, all included in Lathrop Municipal Code (LMC) Title 13, Public Services:

1. LMC Chapter 13.16 – Sewer Service System

2. LMC Chapter 13.26 – Sewer Use and Industrial Wastewater Regulations

Chapters 13.16 and 13.26, as listed above, pertain to the legal authority required for fulfillment of SSMP requirements. These chapters are available on the City's website at https://ecode360.com/44296757.

Portions of these chapters are discussed in the following sub-sections as they pertain to prevention of illicit discharges, proper design and construction of sewer and connections, maintenance access, and enforcement measures. Additional code sections providing legal authority that is referenced but not required by the SWRCB are listed in Section IV of Appendix B.

Prevention of Illicit Discharges

Measures prohibiting illicit discharges to the sewer system are included in the following sections of LMC Chapter 13.16:

- Section 13.16.050 describes the prohibition of discharging storm water to the sewer system;
- Section 13.16.060 describes the prohibitions of excessive use of sewers; and
- Section 13.16.070 specifically demonstrates the City's legal authority for preventing illicit discharges of substances containing chemicals and unauthorized debris which may interfere with the operation of the sewer system.
- Section 13.26.020 describes general prohibitions of pollutants or wastewater which causes pass through or interference.

Proper Design and Construction of Sewers and Connections

LMC Sections 13.16.100 and 13.16.110 requires approval of plans and specifications for sewerage construction prior to construction. If a facility generates and discharges industrial wastewater, a permit for industrial wastewater discharge must be obtained. In accordance with Section 13.26.050, the City requires that all new design and construction of sewers and connections meet the City of Lathrop PWD Design and Construction Standards, as discussed in Element 5.

The City has adopted the 2019 California Plumbing Code by reference in LMC Section 15.12.010. The plumbing code requires the proper construction of privately owned sewer lines.

Lateral Maintenance Access

LMC Section 13.16.150 states the property owner is responsible for maintenance, inspection, and repairs of the lateral on private property (from the building to the cleanout located at the public right of way or easement line). Laterals maintained by the City exist within the public right of way or are located within a public utility easement. LMC Section 13.16.280 requires access to all facilities directly or indirectly connected to the City sewer system to be given to authorized personnel of the City at all reasonable times, including during emergencies.

Limit Discharge of FOG and Other Debris

LMC Section 13.16.070 prohibits the discharge of any water or waste containing floatable or dispersed grease (defined as an oil, fat, and grease, or other ether soluble matter) in excess of 50 milligrams per liter (mg/L). The section also restricts the discharge of other types of debris and pollutants. LMC Section 13.26.160 sets uniform requirements for all users regarding fat, oil and grease control.

Enforcement Measures

LMC 13.16 and 13.26 provide penalties for violation of any of the provisions of its chapter. Per LMC 13.26.100, the City has adopted Enforcement Response Plans for the City's IPP and FOG Control Program. The Enforcement Response Plan from the IPP is included in Appendix B.

3.4 Agreements with Other Agencies

City of Manteca Interjurisdictional Sewer Agreement

The City of Lathrop has an agreement with the City of Manteca that allows Lathrop to utilize up to 14.7% of the wastewater treatment capacity of the MWQCF. In accordance with a request from the RWQCB, the City of Lathrop has adopted an interjurisdictional agreement and adopted an IPP, sewer ordinance, and local limits that are at least as stringent as the City of Manteca's. The interjurisdictional agreement is included in Appendix B and designates Manteca as the agent of Lathrop for implementation and enforcement of Lathrop's sewer ordinance against industrial dischargers to the MWQCF system located in Lathrop. Manteca issues permits to all industrial dischargers to the MWQCF system, and conducts inspections, sampling and analysis, and other duties required by Federal and State law or the NPDES permit.

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ELEMENT 4: OPERATIONS AND MAINTENANCE PROGRAM

This section of the SSMP discusses the City's operations, maintenance and other related measures and activities. This section fulfills the Operation and Maintenance Program SSMP requirement for the SWRCB (Element 4).

4.1 Regulatory Requirements for Operations and Maintenance Program

D.4. Operation and Maintenance Program: *The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system.*

D.4.1. Updated Map of Sanitary Sewer System: *An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s). The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries.*

D.4.2. Preventive Operation and Maintenance Activities: *A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors. The scheduling system must include:*

• Inspection and maintenance activities;

• Higher-frequency inspections and maintenance of known problem areas, including areas with tree root problems;

• Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.

The data collection system must document data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure.

D.4.3. Training: *In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors. The training must cover:*

• The requirements of this General Order;

• The Enrollee's Spill Emergency Response Plan procedures and practice drills;

• Skilled estimation of spill volume for field operators; and

• Electronic CIWQS reporting procedures for staff submitting data.

D.4.4. Equipment Inventory: *An inventory of sewer system equipment, including the identification of critical replacement and spare parts.*

4.2 Element 4 Appendix C

As a part of this SSMP update, the City has updated their gravity main hydroflushing and lift station inspection forms to digital excel forms to improve data management and tracking.

Supporting information for Element 4 is included in Appendix C. This appendix includes the following documents:

1. Figure C-1. City of Lathrop Wastewater Infrastructure
2. Figure C-2. City of Lathrop Sewer Collection Systems and Pump Station Drainage Areas
3. Wastewater Gravity Main Hydroflushing Form
4. Daily Lift Station Inspections Report Form
5. Pump Inspection Report Form
6. Force Main Inspection Report
7. Air/Vacuum Release Valve Report
8. Table C-1. Wastewater Pump Station Pump and Motor Information

4.3 Collection System Map Discussion

The City has developed and maintains a geographical information system (GIS) database and maps of its wastewater collection system. The majority of the existing wastewater collection system has been mapped and data collection for asset management is ongoing. Maps of the wastewater infrastructure and service areas and collection systems are shown in Appendix C. These figures illustrate locations of lift stations, pump stations, sewer manholes, and sewer lines.

The City's GIS database of the wastewater collection system contains data including pipe upstream and downstream manholes and invert elevations, diameter, material, length, slope, install date, as-built or plan source, and comments. The City regularly updates the GIS database to fix errors and add new infrastructure from as-built records.

The information maintained in GIS are printed onto a map book of 11"x17" maps for use by Utilities and Engineering staff. The City also maintains copies of the original improvement plans or as-built drawings for reference.

4.4 Utilities Activities

To ensure proper operation of the collection system, Utilities staff and contract treatment operators perform routine preventative operation and maintenance activities. This includes checking the SCADA system panel daily to monitor system performance, perform routine searches, record meter readings, and create performance charts. It also includes system inspections performed at the frequency described in Table 4-1.

TABLE 4-1
ROUTINE INSPECTION OF KEY COLLECTION SYSTEM COMPONENTS

System Components	Inspection Routine	Lead Responsibility
Monitor lift stations for general operation	Daily	Utilities staff
Detailed inspection of lift stations	Annually	Utilities staff
Monitor Crossroads lift station for general operation	Daily	CTF operators
Detailed inspection of Crossroads lift station	Annually	CTF operators
Inspect and flush sewer and manholes	Complete cycle every five years	Utilities staff
Inspect ARVs condition	Once per week	Utilities staff
Inspect force mains to CTF	Once per week	Utilities staff
Inspect force mains to MWQCF	Once per week	Utilities staff

The PWD is in the process of transitioning from the SEMS asset management software to MaintainX as part of its ongoing system modernization efforts. MaintainX is an asset management software used to manage asset inventory, schedule maintenance, and manage work orders. The system stores a library of asset characteristics including name, location, images, maintenance schedule, and work order history. Maintenance work orders are automatically created for each asset based on the routine inspection schedule shown above. The software can also manage system repairs and customer service orders created by staff members.

Sewer Cleaning and Manhole Inspection

Sewer lines are cleaned and flushed on a five-year cycle goal (20 percent of the collection system per year). In addition, the City identifies problem areas that need to be cleaned more frequently and cleans these areas every two to three months. These problem areas are maintained in a SEMS database (and future MaintainX) and updated with scans of inspection logs.

With the flushing of each sewer line, each upstream and downstream manhole is inspected. For each upstream and downstream manhole inspected and flushed, the following information is recorded: date, operator names, location of the originating and receiving manholes, line size, line material, line length, number of runs to clear line, condition of line, depth to invert(s), number of drops in manhole, number of influent and effluent mains in manhole, number of laterals in manhole, and direction of flushing. All observations are recorded on the "Wastewater Hydroflushing Log" contained in Appendix C.

Lift Station Inspection

On a daily basis, crews monitor the SCADA system electronically for lift stations alarms and general troubleshooting. Pump run times are recorded to determine if pumps are operating properly. On a quarterly basis, wet wells are pumped down fully, debris material is removed, and the wet wells are mechanically cleaned. Data are noted on the "Lift Station Inspections Report" form contained in Appendix C.

Once per year, all lift station pumps are lifted from the wet well and inspected. The condition of each of the following components is noted: oil level, oil condition, wear rings, case, volute, pull cable, cord seal, noise, vibration, level sensor, floats, panel, warning lights, and amperage draw. All observations are recorded on the "Pump Inspection Report" form contained in Appendix C.

Air/Vacuum Release Valves (ARVs) Condition

Once per week, ARVs on force mains are inspected. The following items are inspected on the ARVs:

1. Below grade two inch ball valves are visually inspected[2]
2. ARV manhole is checked for evidence of SSOs
3. Air release is inspected
4. Vacuum break is inspected

All observations are recorded on the "Air/Vacuum Release Valve Report" form contained in Appendix C.

Force Mains to CTF and MWQCF

Once per week, the force mains to the MWQCF and the LCTF are driven and inspected. The manholes are opened and the force main is inspected. All observations are noted on the "Force Main Inspection Report" form contained in Appendix C.

Pipeline Inspection

The PWD is in the process of updating its closed circuit television (CCTV) inspection equipment. Currently, CCTV inspections are performed on an as-needed basis, primarily at locations where there are known or suspected issues such as backups or historical problem areas.

The PWD's long-term goal is to implement a procedure for conducting CCTV inspections on 10 percent of the collection system each year, resulting in a complete inspection over a ten-year period. Results of the CCTV inspections would be used to determine low, medium, and high areas of concern within the collection system, increase cleaning efforts and develop a capital improvement program to correct the areas of concern where practical.

[2] The valves are currently not exercised as the valve vault is classified as a confined space. The City will restart valve exercising in the future when a new confined space entry system is acquired.

Investigation of Customer Complaints

The City responds to customer complaints about sewer service, which are generally related to sewer stoppages, SSOs, or odors. Response is performed by the PWD staff during work hours[3] and the on-call operator during afterhours. After receiving a customer compliant, the responder records the complaint on the GoGov system, assess the complaint, and resolve the issue. The City's initial response time goal is 30 minutes.

The majority of the complaints are related to stoppages and most of the stoppages occur in laterals. Although the City responds to all stoppage complaints, the City is not responsible for clearing stoppages in laterals located on private property or outside of the public right-of-way.

4.5 Rehabilitation and Replacement Plan

The City has three methods of scheduling and funding rehabilitation and replacement of existing capital and equipment within the collection system:

1. Routine maintenance is budgeted annually and is planned by Utilities staff as scheduled and/or needed;
2. Scheduling and funding for capital and equipment replacement is also through the departmental budget - scheduled and emergency repairs[4] are funded under this item when the costs of the equipment can be deemed an investment in the system, usually over $1,000; and
3. The City performs a Master Planning update on a 5-year cycle to inform the capital improvement program for replacement due to capacity deficiency and new construction - this method of scheduling and budgeting is used for very large replacement projects or when expansion or oversizing of the facility is needed.

The City's bi-annual budget is available for review on the City's website at: https://www.ci.lathrop.ca.us/finance/page/budget.

Capital and equipment replacement reflects inspection reports recorded during routine maintenance, input from PWD staff, and results of consultant/contractor evaluations of the collection system as described in Section 4.4. Records of equipment inventory and inspection are maintained in the PWD. These will be maintained with the future asset management software that will that help manage utility information and improve wastewater planning and services.

The PWD has several goals to improve the current rehabilitation and replacement plan. These goals include:

1. Develop a list which projects the timeframe for equipment and parts replacement needs. The list will be vital for developing a schedule for implementing short and long-term needs and coordinating funding for those needs. Check time frame

[3] 8:00AM - 6:00PM Monday – Thursday; 8:00AM - 5:00 PM Friday.

[4] The City is currently preparing a 5-year on-call emergency replacement contract for both the sewer and water systems which is intended to promptly address any emergency pipeline failures, spills, or other issues.

estimates annually with equipment operation logs for run time and inspection reports.

2. Develop a formal method for using available operation and maintenance data such as inspection reports, historical SSOs, and field observations to rank the condition of parts of the collection system. Use the results of the ranking for scheduling rehabilitation activities.
3. Upgrade the City's Asset Management program and Computerized Maintenance Management System (CMMS) technologies to tie to the City's GIS database.

4.6 Training

PWD Utilities staff are trained on a regular basis on the use of the sewer cleaning equipment, methods for flushing the sewer system, work safety, permitting requirements and emergency response procedures. General tailgate safety meetings are held each Tuesday for operators. Updates regarding the sewer system are generally announced at these meetings.

PWD Utilities staff also attend pump inspection classes and sewer-jetting truck (Vac-Con) equipment training. All PWD Utilities staff are required obtain the Collection System Maintenance certificate from the California Water Environment Association (CEWA) Collections Grade 1. Lastly, the PWD conducts periodic spill response training both in-house and externally, which include live demonstrations on how to address emergency scenarios.

4.7 Equipment and Replacement Parts

Operation and maintenance manuals for most of the pump stations and equipment are available. The operation and maintenance manuals contain manufacturer information pertaining to recommended maintenance procedures and parts lists. A small inventory of spare parts such as washers, packing, and lanyards are maintained by the PWD. Larger parts such as impellers and motors for pumps are ordered as needed. Because the pump stations are designed with one redundant pumping unit, sufficient time is typically available for ordering replacement parts and repairing the units. Additionally, the City has spare pumps on hand which can be used in emergencies. Information on the pumps at the existing City pump and lift stations is provided in Appendix C. The City also works with an outside company for providing back-up sewer cleaner trucks when needed.

ELEMENT 5: DESIGN & PERFORMANCE PROVISIONS

This section of the SSMP discusses the City's design and construction standards. This section fulfills the Design and Performance Provisions SSMP requirement for the SWRCB (Element 5).

5.1 Regulatory Requirements for Design & Performance Provisions

***D.5. Design and Performance Provisions**: The Plan must include the following items as appropriate and applicable to the Enrollee's system.*

***D.5.1. Updated Design Criteria and Construction Standards and Specifications:** Updated design criteria, and construction standards and specifications, for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria.*

***D.5.2. Procedures and Standards:** Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.*

5.2 Element 5 Appendix

None.

5.3 Design & Performance Provisions Discussion

The PWD Design and Construction Standards ("Standards") are available at the City's website (https://www.ci.lathrop.ca.us/publicworks/page/design-construction-standards) and includes standards and specifications for the sewer collection system, pump stations, and other appurtenances and for the rehabilitation and repair of existing sanitary sewer systems.

The City typically updates its Standards every five years, or as needed. The most recent update of the Design and Construction Standards was in July 2024. The City's wastewater generation factors and capacity design criteria were updated as part of its 2024 Master Plan update and were incorporated in the Standards.

The City Standards also include testing and inspection procedures for sewer projects. The PWD has a full-time construction inspector for public works projects, who is responsible for inspection and testing of the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

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ELEMENT 6: SPILL EMERGENCY RESPONSE PLAN

The section of the SSMP provides an overview and summary of the City's emergency response documents and procedures for SSOs. This section fulfills the Spill Emergency Response Plan requirement of the SWRCB (Element 6) SSMP requirements. Complete documentation of SSO response procedures are attached in Appendix D.

6.1 Regulatory Requirements for Spill Emergency Response Plan Element

D.6. Spill Emergency Response Plan*: The Plan must include an up to date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to:*

• Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;

• Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;

• Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders;

• Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained;

• Address emergency system operations, traffic control and other necessary response activities;

• Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;

• Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;

• Remove sewage from the drainage conveyance system;

• Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;

• Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;

• Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;

• Conduct post-spill assessments of spill response activities;

• Document and report spill events as required in this General Order; and

• Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.

6.2 Element 6 Appendix D

Supporting information for Element 6 is included in Appendix D. This appendix includes the following documents:

1. Spill Emergency Response Plan
2. Spill Emergency Response Plan SSO Reporting Chain of Communication
3. Spill Emergency Response Plan List of Contacts
4. Procedures for Estimating the Volume of Sewer Overflows
5. Sanitary Sewer Overflow Report Form

6.3 Spill Emergency Response Plan

The City's Spill Emergency Response Plan (SERP) is organized into nine sections, as follows:

I. Overflow Detection
II. Initial Response
III. Recovery and Clean-up (Mitigation)
IV. Public Access and Warning
V. Water Quality Sampling and Analysis
VI. Investigation and Documentation
VII. Regulatory Notification and Reporting
VIII. Equipment
IX. Training

Objectives of the City's SERP are to protect public health and the environment, satisfy regulatory agency requirements, and minimize risk of enforcement actions against the City. Additional objectives include providing appropriate customer service and protecting City personnel, the collection system and facilities, and private and public property.

The City's SERP, included as part of this SSMP, is also maintained in a separate binder and kept at the PWD for use by O&M staff. This allows staff to easily reference the SERP without having to carry a complete copy of the SSMP.

Overflow Detection

This section of the plan details procedures for SSO detection, either by the public, City employees, or through the City's SCADA system. This section includes procedures for the PWD receptionist or on-call employee to receive and record relevant information regarding a possible SSO from a caller. This section also includes procedures for handling online reports.

Initial Response

This section details procedures when the maintenance crew first arrives at the site of a SSO. It is the responsibility of the first personnel to arrive at the site of a SSO to protect the health and safety of the public by mitigating the impact of the SSO to the maximum extent possible. Upon arrival, the crew is responsible for determining the cause of the SSO, assessing the need for additional equipment or assistance, notifying the dispatcher to contact appropriate agencies if immediate notification is needed, and taking immediate steps to stop the SSO. Guidelines for completing and documenting a preliminary damage assessment are provided, and coordination with any hazardous material response is explained.

Recovery and Clean-up (Mitigation)

This section describes recovery and clean-up procedures to be performed by the sewer maintenance crew to restore the site to normal. Specific clean-up procedures are provided for paved areas, areas with bare soil or vegetation, and environmentally sensitive areas.

Public Access and Warning

This section describes procedures to set up barricades and post warning signs where public health may be at risk by contract with sewage or sewage contamination.

Water Quality Sampling and Analysis

This section describes how water quality samples shall be taken in any body of water receiving sewage to determine the extent of the contamination. Water quality sampling should be performed to:

1. Determine the extent of the area that has been impacted by sewage contamination; and,
2. Determine when the area is safe for public contact.

Water quality samples may be taken by trained staff or an independent water quality testing laboratory under contract with the City.

Investigation and Documentation

Procedures for investigation and documentation of SSOs are provided in this section of the SERP. Information obtained for the SSO shall be recorded on the Internal Sanitary Sewer Spill Report Form provided in Appendix D. All information and documentation shall be kept in a file created for each SSO event. A checklist of the information that should be included to document the SSO event is provided in Appendix D.

Regulatory Notification and Reporting

The reissued 2022 General Order has clarified the prohibition of discharge to the Waters of the State to include any surface water or groundwater, including saline waters, within the boundaries of the state as defined in Water Code section 13050(e), and are inclusive of waters of the United States.

Procedures for notification and reporting are provided in this section of the SERP for each of the four SSO categories established by the SWRCB:

Category 1 Spill

A Category 1 spill is a spill of any volume of sewage from or caused by a sanitary sewer system regulated under this General Order 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.

Any spill volume not recovered from a drainage conveyance system is considered a discharge to surface water, unless the drainage conveyance system discharges to a dedicated stormwater infiltration basin or facility.

A spill from an Enrollee-owned and/or operated lateral that discharges to a surface water is a Category 1 spill; the Enrollee shall report all Category 1 spills per section 3.1 of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirements) of this General Order.

Category 2 Spill

A Category 2 spill is a spill of 1,000 gallons or greater, from or caused by a sanitary sewer system regulated under this General Order 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 Spill

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 regulated under this General Order 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 Spill

A Category 4 spill is a spill of less than 50 gallons, from or caused by a sanitary sewer system regulated under this General Order 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.

The SERP lists the information that needs to be reported to the California Office of Emergency Services (Cal OES), the Central Valley RWQCB, and the CIWQS online database. Procedures for notification of San Joaquin Department of Environmental Health, California Department of Fish and Wildlife, South San Joaquin Irrigation District, and local

agencies and officials are also provided in the plan. A summary of regulatory agencies to be notified immediately of an SSO is provided in Table 2-1.

Equipment

This section of the SERP provides a list and description of equipment required to respond to a SSO such as:

- Vac-Con Truck
- Portable Pumps and Hoses
- Street Sweeper
- CCTV Inspection Unit
- Emergency Response Truck(s)/Trailer
- Photographic Equipment
- GPS Unit

Training

This section of the SERP provides training procedures for personnel that may have a role in responding to a SSO. Initial and annual refresher training in SSO response will be provided to all employees to ensure they are appropriately trained. SSO response exercises will be held to ensure that employees are up to date on the procedures, to verify the equipment is in working order, and the required materials are readily available. The training exercises should cover scenarios typically observed during sewer-related emergencies (e.g. mainline blockage, mainline failure, force main failure, pump station failure, and lateral blockage). Records shall be kept of all training that is provided in support of this plan.

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ELEMENT 7: SEWER PIPE BLOCKAGE CONTROL PROGRAM

This section of the SSMP discusses the City's blockage control measures, including identification of problem areas, focused cleaning, and source control. This section fulfills the sewer pipe blockage control requirements for the SWRCB (Element 7) SSMP requirements.

7.1 Regulatory Requirements for Blockage Control Element

D.7. Sewer Pipe Blockage Control Program: *The Sewer System Management Plan must include procedures for the evaluation of the Enrollee's service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags and debris. If the Enrollee determines that a program is not needed, the Enrollee shall provide justification in its Plan for why a program is not needed.*

The procedures must include, at minimum:

• An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances;

• A plan and schedule for the disposal of pipe-blocking substances generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of substances generated within a sanitary sewer system service area;

• The legal authority to prohibit discharges to the system and identify measures to prevent spills and blockages;

• Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping and reporting requirements;

• Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the fats, oils, and grease ordinance;

• An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and

• Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above.

7.2 Element 7 Appendix E

Supporting information for Element 7 is included in Appendix E. This appendix includes the following documents:

1. Table E-1. List of Food Service Facilities in Lathrop
2. City of Lathrop - Industrial Pretreatment Program, Enforcement Response Plan
3. "Preventing Sewer Backups" public outreach brochure.

7.3 Blockage Control Discussion

This section discusses measures the City takes to control blockages. The reissued WDR has expanded this Element to include the consideration of additional items which may cause blockages in the sewer system including rags, debris, and root intrusion. Historically, the City has not identified root intrusion to be a common issue. The City has determined that a fat, oils, and grease (FOG) control program is sufficient per SSMP requirements.

Approximately 53 Food Service Establishment (FSEs) are located within City limits as of September 2024 and discharge to City sewers. A list of FSEs in Lathrop identified as potential grease dischargers is provided in Appendix E. Utilities staff have also noted the tendency for grease buildup in specific sewer lines and developed targeted cleaning of these areas.

The City's FOG control program consists of routine sewer cleaning and maintenance as well as source control. The City is working with Compliance First to administer the City's source control inspections for FOG. The PWD Compliance Engineer oversees inspections, enforcement of the municipal ordinance requirement, and updates to the FSE database. Implementation procedures for the FOG program are provided in Appendix B: Enforcement Response Plan – Fat Oil & Grease Source Control Program (FOG ERP).

The City does not have a FOG disposal plan. However, FSEs within the City are required to use acceptable disposal facilities (per LMC Section 13.26.160.F) and maintain grease trap pumping manifests for City inspection.

The following subsections discuss identification and cleaning of grease-prone areas, legal authority to prohibit grease discharge or require a grease removal device, facility inspection, and public outreach.

Identification and Sewer Cleaning

The core means of controlling grease and other potential blockage are (a) identification of trouble spots or sewer lines that are prone to grease accumulation, (b) targeted cleaning of these areas on a quarterly basis, and (c) inspection of sewers following blockages. Each of these FOG control measures are discussed in more detail below:

a. Identification of Problem Areas. The City identifies potential blockage problem areas by tracking locations and causes of dry weather blockages and SSOs. Additionally, debris type and severity are noted by maintenance crews during routine cleaning. Areas with several restaurants or grease-producing facilities are also considered likely potential grease problem areas. The City has identified the following specific locations for increased inspection:

   i. J street sewer south of Savemart and the J Street PS.

   ii. O Street sewer upstream of the pumpstation experiences accumulation of rags and FOG. This issue may be caused by the J street PS moving material down to O Street and low flow velocity in this area.

   iii. Woodfield PS due to increased accumulation of debris and rags.

b. Sewer Cleaning. City sewer maintenance crews clean the entire wastewater collection system at least once every five years. Additional cleaning is provided on

an as-needed basis for areas with a history of stoppages or overflows on a line, as well as areas expected to be prone to grease buildup.

c. Blockage Investigation. The City inspects each sewer following a blockage. If the source of the grease in a lateral can be identified, the City contacts that restaurant or source of grease.

Additional information about cleaning and maintenance is included in Element 4 - Operations and Maintenance Program.

Legal Authority

The LMC establishes legal authority to prohibit discharge of water or waste to the system containing floatable grease in excess of 50 mg/l or dispersed in excess of fifty (50) mg/l). The LMC requires grease, oil, or sand interceptors to be provided when, in the opinion of the Public Works Director, they are necessary for the proper handling of liquid wastes containing grease in excessive amounts. The interceptors are to be of a type and capacity approved by the Public Works Director, and shall be located as to be readily and easily accessible by PWD staff for inspection and cleaning. The grease, oil and sand interceptors are to be maintained in continuous and efficient operation. (LMC Section 13.16.070).

The sewer ordinance and other documents related to the City's FOG control program are contained in Appendix B: FOG ERP.

Facility Inspection

Facilities are routinely inspected as part of Lathrop's FOG control program, typically on an annual schedule. The City contracts with Compliance First to conduct FOG inspections of the FSEs within the City service area. Facilities are inspected as follow-up to user surveys to identify new and/or existing sources, for permit termination and closure, for industrial user monitoring, and for installation and routine inspections of FOG interceptors and traps. Information on facility inspection procedures is included in the City's IPP (Appendix E) and the FOG ERP (Appendix B). A sample Facility Inspection Form and inspection checklist used during facility inspections is provided in the FOG ERP.

During FOG inspections and enforcement, information regarding the FOG control program ordinance and kitchen best management practices are provided to FSEs. Sample brochures are included in the FOG ERP in Appendix B.

Public Outreach

Information on the City's FOG Control Program is available on the City's website (https://www.ci.lathrop.ca.us/publicworks/page/fats-oils-greases).

The City produces a brochure entitled "Preventing Sewer Backups and Overflows", which targets residential users and discusses how FOG can cause sewer blockages. The brochure also directs residents to on how to properly dispose of FOG. This brochure is displayed at City Hall and provided by O&M staff to residents who are affected by a blockage or backup. A copy of the brochure is included in Appendix E.

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ELEMENT 8: SYSTEM EVALUATION, CAPACITY ASSURANCE, AND CAPITAL IMPROVEMENTS

This section of the SSMP discusses City capacity management measures, including the most recent Master Plan and recommended capacity improvement projects. This section fulfills the System Evaluation and Capacity Assurance Plan SSMP requirement for the SWRCB (Element 8).

8.1 Regulatory Requirements for Capacity Management

D.8. System Evaluation, Capacity Assurance And Capital Improvements
The Plan must include procedures and activities for:
• Routine evaluation and assessment of system conditions;
• Capacity assessment and design criteria;
• Prioritization of corrective actions; and
• A capital improvement plan.
D.8.1 System Evaluation and Condition Assessment
The Plan must include procedures to:
• Evaluate the sanitary sewer system assets utilizing the best practices and technologies available;
• Identify and justify the amount (percentage) of its system for its condition to be assessed each year;
• Prioritize the condition assessment of system areas that hold a high level of environmental consequence, are near surface waters, or are within the vicinity of a bacterial-related impairment.
• Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods;
• Utilize observations/evidence of system conditions that may contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State;
• Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities; and
• Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to: sea level rise; flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions.
D.8.2. Capacity Assessment and Design Criteria
The Plan must include procedures to identify system components that are experiencing or contributing to spills caused by hydraulic deficiency and/or limited capacity, including procedures to identify the appropriate hydraulic capacity of key system elements for:
• Dry-weather peak flow conditions that cause or contributes to spill events;
• The appropriate design storm(s) or wet weather events that causes or contributes to spill events;
• The capacity of key system components; and
• Identify the major sources that contribute to the peak flows associated with sewer spills.
The capacity assessment must consider:
• Data from existing system condition assessments, system inspections, system audits, spill history, and other available information;
• Capacity of flood-prone systems subject to increased infiltration and inflow, under normal local and regional storm conditions;
D.8.3. Prioritization of Corrective Action
The findings of the condition assessments and capacity assessments must be used to prioritize corrective actions. Prioritization must consider the severity of the consequences of potential spills.
D8.4. Capital Improvement Plan
The capital improvement plan must include the following items:
• Project schedules including completion dates for all portions of the capital improvement program;
• Internal and external project funding sources for each project; and
• Joint coordination between operation and maintenance staff, and engineering staff/consultants during planning, design, and construction of capital improvement projects; and Interagency coordination with other impacted utility agencies.

8.2 Element 8 Appendix F

1. Table F-1. Current and Historical ADWF and Per Capita ADWF
2. Table F-2. Projected Wastewater Flow by Development Area
3. Table F-3. Existing and Future Wastewater Flow by Development Area
4. Table F-4. Peak Wet Weather Flow at Pump Stations.
5. Table F-5. Recommended Collection System Improvement Projects
6. Figure F-1. Overview of Capital Improvement Projects

8.3 Capacity Evaluation

The City evaluates collection system capacity and identifies improvement projects during its master planning process. The City updated its Wastewater System Master Plan (WWSMP) in 2024.

The WWSMP's capacity evaluation assessed the collection system's ability to carry existing and projected Peak Wet Weather Flows (PWWFs), which is the highest hourly flow experienced during the year due to rainfall-induced infiltration and inflow (I&I) and peak diurnal sanitary flows. A hydraulic model was constructed to assess the ability of the City's existing and key planned infrastructure to meet capacity design criteria under projected PWWF conditions.

The following sections summarize development of wastewater flow unit factors and wastewater generation projections, the hydraulic assessment of the City's existing and key planned infrastructure, and development of recommended wastewater CIPs included in the 2024 WWSMP.

Existing and Future Wastewater Generation

PWWF is calculated by multiplying the Average Dry Weather Flow (ADWF) by a peaking factor. The established ADWF and the PWWF peaking factor are discussed below.

As part of IWRMP development, land use-specific wastewater generation factors were established using historic wastewater flow and parcel-level water use data. The wastewater generation factors serve as the basis to estimate ADWF for future developments. The IWRMP updated wastewater generation factors (in units of gallons per day per dwelling unit or gallons per day per acre; gpd/du or gpd/ac) are presented in Table 8-1, below.

TABLE 8-1
WASTEWATER FLOW FACTORS

Land Use	Wastewater Flow Factor	
	Historic Lathrop	West Lathrop
Low Density Residential	240 gpd/du	200 gpd/du
Medium Density Residential	200 gpd/du	155 gpd/du
High Density Residential	110 gpd/du	
Commercial	755 gpd/ac	
Industrial	240 gpd/ac	
Parks	55 gpd/ac	
Schools / Institutional	220 gpd/ac	

Wastewater ADWF projections were calculated as the sum of two major components of future wastewater flow: (1) the volume of wastewater that best represents existing wastewater generation in the City, and (2) the anticipated wastewater generation associated with future development projects and planning areas.

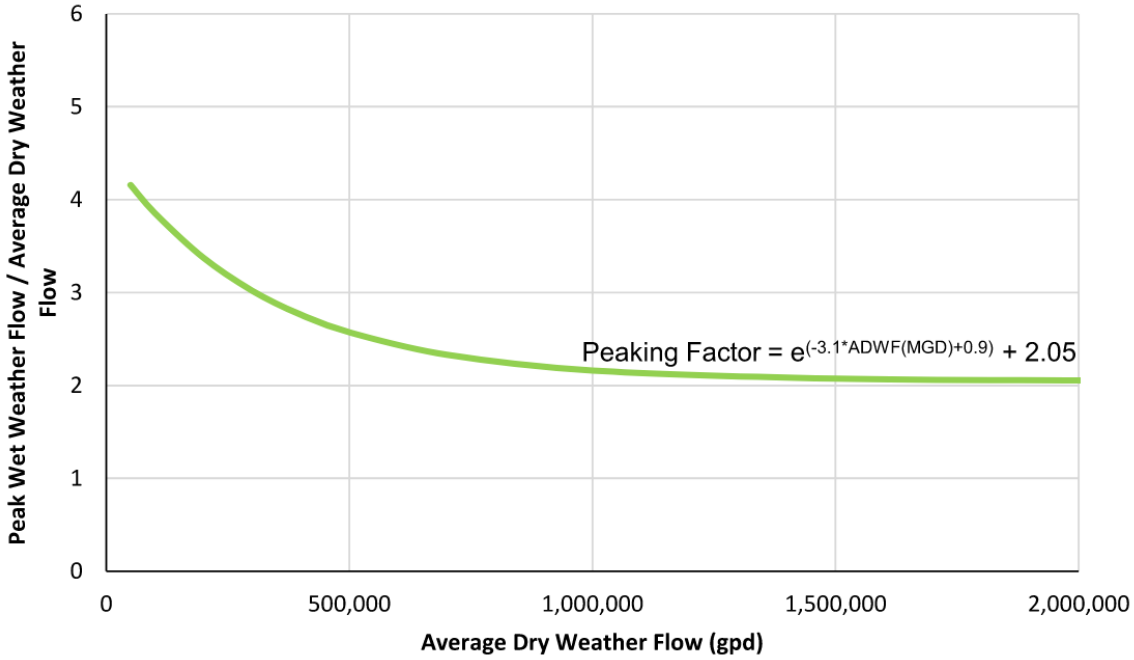
These factors are developed based on 2017 to 2021 wastewater flows and update those included in the 2019 WWSMP. As shown on Table F-1, the total existing ADWF is estimated to be 2.2 million gallons per day (MGD).

Table F-2 summarizes wastewater generation associated with anticipated future development by development area. Future wastewater generation is estimated using the updated wastewater flow factors and the anticipated acreages and number of dwelling units associated with each proposed development. Table F-3 summarizes the City's projected wastewater generation by sector and by development area in five-year increments between 2025 and 2040 and at buildout, based on development projections. Based on these projections, it is anticipated that total ADWF in 2040 will be 5.34 MGD, whereas the ADWF at Buildout is estimated to be 5.67 MGD. Of these totals, ADWFs of 1.31 MGD and 1.36 MGD are anticipated to flow to MWQCF in 2040 and at buildout, respectively. ADWFs of 4.03 MGD in 2040 and 4.31 MGD at buildout are projected to flow to the CTF.

A peaking factor was developed based on the City's historical wastewater flow data to best estimate PWWF, as shown on Figure 8-1. The PWWF peaking factors are typically higher in smaller drainage areas, in which there is little flow attenuation. Larger drainage areas provide a greater capacity to attenuate flows, as peak flows generated in the upstream reaches of the system take a longer amount of time to travel downstream. The methodologies used to develop this curve are described in the WWSMP.

Modeled PWWF at each pump station are summarized in Table F-4.

FIGURE 8-1
AVERAGE DRY WEATHER FLOW AND PEAKING FACTORS



Design Criteria

The capacity design criteria used to evaluate the City's existing collection system are summarized below:

- Gravity mains 15 inches in diameter and smaller are designed for peak flows with a maximum depth to diameter (d/D) ratio of 0.50. Gravity mains 18 inches in diameter and larger are designed for peak flows at a maximum d/D ratio of 0.75.
- Maximum velocity in force mains is designed to be less than 10 fps during peak flows.
- Pump stations should be designed to convey PWWF within its firm capacity[5].

Hydraulic Model

The hydraulic capacity evaluation was conducted using a hydraulic model. The hydraulic model was developed using the Innovyze InfoSWMM modeling platform, a GIS-based hydraulic modeling software. To optimize the model building and maintenance process, a key objective of the modeling effort was to construct hydraulic models that are integrated with the City's infrastructure GIS (as described in Element 4) and allow for automatic synchronization between the model and infrastructure GIS to limit future maintenance efforts.

The hydraulic modeling approach for capacity evaluation included (1) conducting steady-state model simulations of PWWF conditions, and (2) evaluation of capacity and head

[5] Defined as pumping capacity with the largest pumping unit out of service.

requirements at PWWF for each lift station or pump station for existing, and future development scenarios. These scenarios include the Existing (2022) and Buildout (2045) to evaluate existing system deficiencies and infrastructure needs at full buildout, respectively.

Capacity Evaluation Results

Model results have shown that approximately 3% of City's existing gravity mains will not meet the capacity criteria by 2045. Areas with capacity deficiencies are mostly consistent in all scenarios, indicating that most capacity deficiencies identified in the future scenarios already exist given the estimated existing PWWF, although the degree of deficiency does increase with projected development. Capacity deficiencies are identified in the Stonebridge LS in all scenarios. The City's existing and planned force mains are able to convey projected wastewater flow beyond 2040.

8.4 Recommended Capacity Projects

The City's five-year Capital Improvement Program identifies scheduled wastewater CIPs on the City's website at:
https://www.ci.lathrop.ca.us/sites/default/files/fileattachments/finance/page/5573/0_fy2021_2023_adopted_budget.pdf

The WWSMP recommended additional CIPs to address the potential deficiencies identified in the hydraulic assessment discussed in Section 8.3. Table F-5 summarizes all the WWSMP-recommended collection system CIPs, including location, timeframe, proposed improvements, estimated planning level costs, and alternatives. As shown in Table F-5 and seen on Figure F-1, total Opinion of Probable Cost (OPC) for the recommended collection system CIPs over the 20-year planning horizon is approximately $47.6 million.

8.5 CIP Schedule

The City's five-year Capital Improvement Program identifies the implementation schedule and funding sources for collection system CIPs.

The five-year Capital Improvement Program will be updated to incorporate WWSMP recommendations. The WWSMP prioritized recommended CIPs based on the timing and the level of deficiency the CIPs are designed to address. Given that the majority of the identified CIPs address deficiencies in the existing collection system, the CIPs have been prioritized in the following order: (1) projects addressing existing deficiencies with modeled surcharging, (2) projects addressing other existing deficiencies, and (3) projects addressing deficiencies associated with future flows.

8.6 Financial and Economic Analysis

The City maintains a five-year CIP which is regularly updated based on the system's capacity evaluation and is the basis for establishing new sewer rates. Funding for the City's capacity CIPs are sourced from developers if they are due to planned new development, or from the City's Sewer Capital Replacement Fund if it is related to an existing deficiency.

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ELEMENT 9: MONITORING, MEASUREMENT, & PROGRAM MODIFICATIONS

This section of the SSMP discusses parameters the City tracks to monitor the success of the SSMP and how the City plans to keep the SSMP current. This section fulfills the Monitoring, Measurement, and Program Modifications requirement for the SWRCB (Element 9) SSMP requirements.

9.1 Regulatory Requirements for Monitoring, Measurement, & Program Modifications

> ***D.9. Monitoring, Measurement and Program Modifications***
>
> *The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:*
>
> *• Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities;*
>
> *• Monitoring the implementation and measuring the effectiveness of each Plan Element;*
>
> *• Assessing the success of the preventive operation and maintenance activities;*
>
> *• Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and*
>
> *• Identifying and illustrating spill trends, including spill frequency, locations and estimated volumes.*

9.2 Element 9 Appendix G

Supporting information for Element 9 is included in Appendix G. This appendix includes the following documents:

1. SSMP Monitoring Tracking Sheet
2. SSMP Change Log

9.3 Monitoring and Measurement Discussion

The City tracks several performance measures through tracking logs and annual reports, including but not limited to number, cause, location, and volume of SSOs; SSO response time; length of pipe cleaned, inspected, and type of debris found; number of FSEs inspected; and the type and attendance of staff training. The City plans to continue tracking all performance measures that are currently tracked.

In order to monitor the effectiveness of the SSMP, however, the City has selected certain, specific parameters that can be documented and compared on an annual basis in a simple format. These parameters were selected because they are straightforward, quantitative, and focused on results. Although the parameters may not track everything associated with SSMP implementation, changes in these parameters over time will indicate the overall

success of the SSMP or, conversely, underlying problems that can then be investigated further.

Table 9-1 lists each SSMP element, the overall purpose of the SSMP element, and the specific parameters that the City plans to monitor that will help in evaluating the effectiveness of the SSMP. Appendix G includes a tracking sheet listing each of these parameters, which the City will fill out on a regular basis.

TABLE 9-1
SSMP MONITORING PARAMETERS, BY SSMP ELEMENT

SSMP Element	Summary of Element Purpose	Parameters for Tracking Effectiveness (Annual)
4 - Operations and Maintenance Program	Minimize blockages and SSOs by properly operating and maintaining the system.	• Total number and volume of SSOs • Total amount recovered • Total amount estimated to reach surface waters • Percent reaching surface water • Total length of pipe CCTV'd • Total length of pipe hydrocleaned • Total length of pipe repaired or replaced
6 - Spill Emergency Response Plan	Provide timely and effective response to SSO emergencies and comply with regulatory reporting requirements	• Percent of total SSO volume contained or returned to sewer
7 - Sewer Pipe Blockage Control Program	Minimize blockages and SSOs due to FOG	• Number of SSOs due to FOG • Number of blockages due to FOG • Number of FSEs inspected

The City will use the specific tracked parameters listed in Table 9-1 and documented on the tracking sheet included in Appendix G to assist in completion of the SSMP Audit every three years as described in Element 10. As noted above, the City will also continue to collect data for all performance measures currently tracked. This additional information

that the City collects, such as customer complaints and length of pipe cleaned, will be used to support or further evaluate the successes and limitations of the SSMP as needed.

9.4 SSMP Modifications

The SSMP needs to be updated periodically to maintain current information, and programs need to be enhanced or modified if they are determined to be less effective than needed. The City will review the successes and needed improvements of the SSMP as part of the SSMP audit, described in Element 10.

City staff will update critical information, such as contact numbers and the SSO response chain of communication, as needed. A comprehensive SSMP update will occur every six years, as required by the SWRCB. The City will schedule this SSMP update to occur in conjunction with WWSMP updates. All changes made to the SSMP shall be listed in the SSMP Change Log in Appendix G.

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ELEMENT 10: INTERNAL PROGRAM AUDITS

This section of the SSMP discusses the City's SSMP auditing program. This section fulfills the SWRCB (Element 10) SSMP Audit requirements.

10.1 Regulatory Requirements for SSMP Audits

> ***D.10 Internal Audits:*** *The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order.*

10.2 Element 10 Appendix H

Supporting information for Element 10 is included in Appendix H. This appendix includes the following documents:

1. Blank SSMP Program Audit Form
2. Completed SSMP Program Audits

10.3 SSMP Audits Discussion

The City will complete audits of its SSMP every three years pursuant to the 2022 General Order and will prepare a report to be kept on file. Within six months after the end of the required 3-year audit period, the LRO shall submit an audit report into the online CIWQS Database.

Once the audit findings have been determined, the City shall distribute findings to operations staff; allow ample time for review; and hold a meeting to discuss and document outcomes of discussion. Include findings, recommended corrective actions, input from collection system operations staff, and a proposed schedule to address identified deficiencies.

The audit will include the following:

- Review of progress made on development of SSMP elements;
- Review of monitoring and measurement tracked under Element 9 (i.e. historical performance results should be reviewed to determine plan effectiveness);
- Identification of successes of implementing SSMP elements;
- Identification of deficiencies in implementation of the SSMP elements;
- Determine necessary improvements to the SSMP to improve compliance, implementation, or effectiveness;
- Description of system improvements during the audit period; and
- Description of system improvements planned for the upcoming two years, with an estimated schedule for implementation.

Upon completion of the audit, the City will keep a report of the audit on file to fulfill the

SWRCB audit requirement. A copy of the last three audits will be stored in Appendix H of the SSMP. Modifications and changes to the SSMP will be identified and tracked by the SSMP Change Log and included in Appendix G. This log will be used to track SSMP changes in the periods between audits as well as changes made as a result of audits or SSMP updates.

ELEMENT 11: COMMUNICATION PROGRAM

This section of the SSMP discusses the City's communications with the public and satellite agencies. This section fulfills the Communication Program requirement for SWRCB (Element 11).

11.1 Regulatory Requirements for Communication Program

D.11. Communication Program

The Plan must include procedures for the Enrollee to communicate with:

• The public for:

- *Spills and discharges resulting in closures of public areas, or that enter a source of drinking water, and*
- *The development, implementation, and update of its Plan, including opportunities for public input to Plan implementation and updates.*

• Owners/operators of systems that connect into the Enrollee's system, including satellite systems, for system operation, maintenance, and capital improvement-related activities.

11.2 Element 11 Appendix I

Supporting information for Element 11 is included in Appendix I. This appendix includes the following documents:

1. Copy of Public Notification

11.3 Communication Program Discussion

The City will communicate with the public on the development, implementation, and performance of its SSMP by placing notices on the City's website. Additionally, flyers will be posted at City Hall announcing the availability of the SSMP to the public, upon request. Public comments are welcomed during the development, implementation, and performance of the SSMP. Public comments will be directed to the PWD's phone number at (209) 941-7430. Comments will be forwarded to the administrative staff responsible for oversight of the SSMP.

As further discussed in Element 6 and the Spill Emergency Response Plan, in the event of an SSO, the City shall post signs informing people to remain out of the affected area, agency name, and contact information should be included.

The City maintains an open line of communication with City of Manteca per the City's Interjurisdictional Agreement with Manteca, because a portion of the sewer flows from the City are directed to the MWQCF.

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APPENDIX A – Element 2 (Organization) Supporting Documents

1. Figure A-1. Organization Chart of Wastewater Utility Staff
2. Description of General Responsibilities for Wastewater Utility Staff
3. Table A-1. Names and Telephone Numbers of Staff Responsible for SSMP
4. Table A-2. List of City Staff Responsible for SSMP Elements

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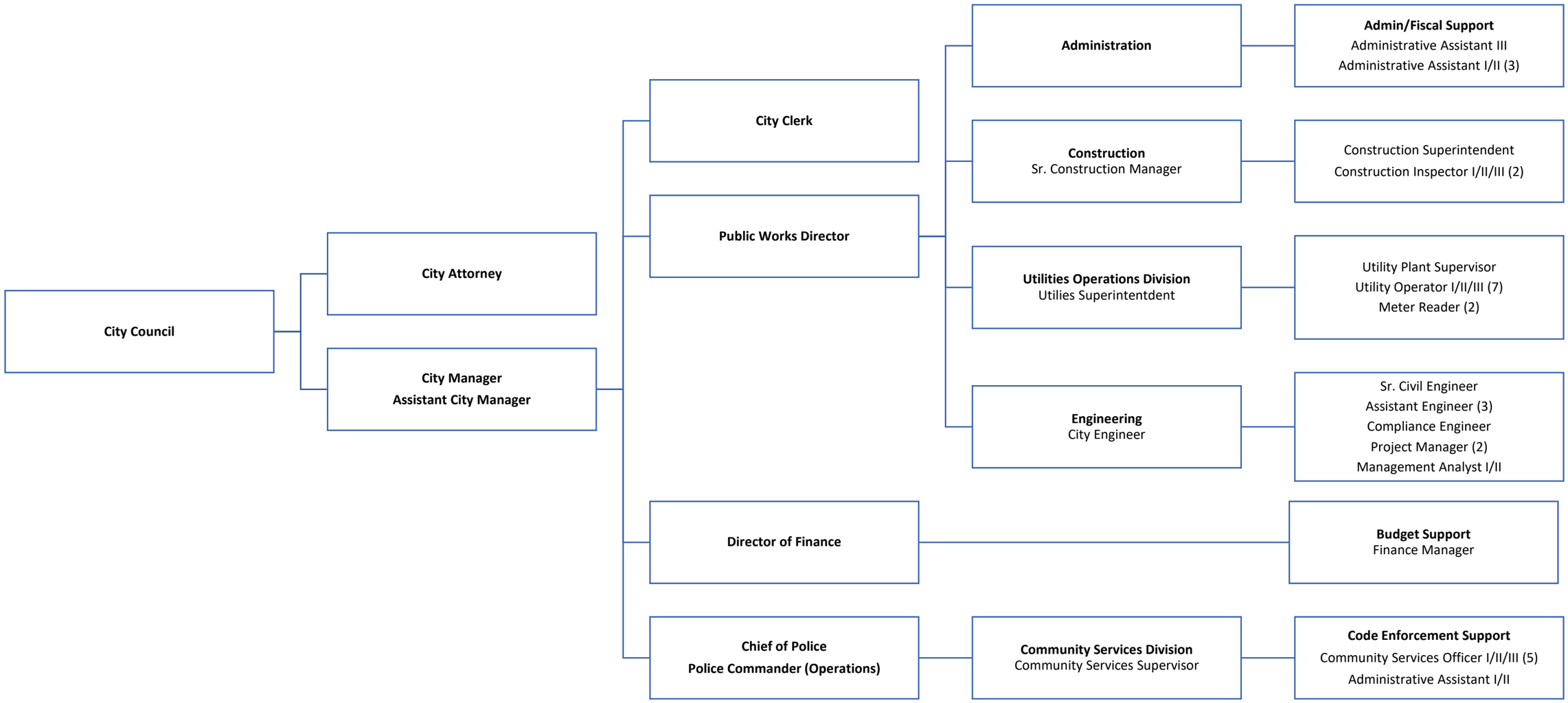
Figure A-1 Organization Chart of Wastewater Utility Staff



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Description of General Responsibilities

City Manager: Under policy direction, serves as the Chief Administrative Officer of the City and directs the activities and operation of all departments; advises and assists the City Council in the conduct of City business; provides administrative oversight to the operational and policy functions of City government; coordinates City business with various programs, officials and outside agencies; provides a variety of other responsible and complex administrative support to the City Council; performs other related duties as required.

Assistant City Manager (acting Public Works Director): Under general administrative direction, performs highly responsible and complex professional administrative work while assisting the City Manager with the direction and coordination of the activities of assigned City departments and or divisions. Under administrative direction, plans, manages, oversees and directs operations and services of the Public Works Department, which includes Public Utilities, Civil Engineering, Land Development, Construction Management, Regulatory Compliance, Flood Management, and Building Services; assists the City Manager in coordinating and directing citywide departmental activities and operations; relieves the City Manager of day-to-day duties associated with municipal operations; promotes effective and efficient operations throughout the organization by facilitating interdepartmental cooperation and sharing of resources; provides responsible staff assistance to the City Manager, City Council, and department heads;-- acts for the City Manager in his/her absence; performs other related duties as required.

City Engineer: Under administrative direction from the City Manager, plans, manages, oversees and directs engineering services related to development processing and planning and acts as the City Engineer as required by State law. Coordinates activities with other City officials, departments, outside agencies, contractors, organizations, and the public; provides highly complex staff assistance to the Planning Commission and the City Council as necessary; serves as a technical resource for assigned staff; performs other related duties as required.

Utilities Superintendent: Under general direction, plans, organizes, coordinates, manages, and reviews the operation, maintenance and repair of water treatment and supply facilities, wells, river diversion facilities, storm water pumping stations, drainage facilities, sewer collection systems, and flood protection assigned to the Utility Operations Division; assist in maintenance of Supervisory Control and Data Acquisition (SCADA) Control system and other automation and communications system; ensures safe work practices, work quality, and accuracy; serves as a technical resource to assigned staff and other departments; performs other duties similar in nature.

Utility Plant Supervisor: Under limited direction plans, organizes, coordinates and directs the operations and maintenance of the City's water treatment plant, water distribution, sewer collection, recycled water, storm drain system, facilities and related appurtenances in compliance with state and federal requirements; conducts inspections of plant and equipment; prepares a variety of maintenance records and reports; responsible for completion of water analysis and lab work; supervises assigned personnel and performs other related duties as assigned.

Utility Operator III: Under general supervision, learns to perform and performs the full array of duties assigned to classes in the Utility Operator series, including skilled and semi-skilled work in

the operation, maintenance and repair of the City's water distribution, sewer collection, recycled water, and storm drain systems; assists other units of Public Works in the maintenance of streets, facilities and buildings as needed; demonstrates a full understanding of all applicable policies, procedures and work methods associated with assigned duties; performs other related duties as required. Additionally, under general supervision, operates all of the water treatment and related processes associated with the City's water treatment plant, pump stations, and reservoirs; performs standard water quality chemical tests, makes minor and major repairs to plant equipment and performs other job related duties.

Utility Operator I/II: Under general supervision, learns to perform and performs the full array of duties assigned to classes in the Utility Operator series, including skilled and semi-skilled work in the operation, maintenance and repair of the City's water distribution, sewer collection and storm drain systems; assists other units of Public Works in the maintenance of streets, facilities and buildings as needed; demonstrates a full understanding of all applicable policies, procedures and work methods associated with assigned duties; performs other related duties as required.

Senior Civil Engineer: Under general direction, plans, manages, leads, oversees and performs professional and technical engineering work in the design, investigation, project management, and construction of Public Works engineering activities, including water and wastewater systems/plants; coordinates water and wastewater projects, development review, and/or master plans and assigned activities with other divisions, departments, consultants, contractors, engineers, and outside agencies; performs other related duties as required.

Associate/Assistant Engineer: Under general supervision, performs professional engineering work in the design, evaluation and construction of streets, traffic controls, landscaping, parks, storm drains, sewer, water and other public works projects; serves as a project manager on medium or less complex Capital Improvement Projects; reviews engineering reports, drawings, specifications and calculations for buildings, structures, streets, sewers and other public works facilities to ensure compliance with current industry practices, codes, regulations and ordinances; performs other related duties as required.

Compliance Engineer: Under general supervision, assists and coordinate assigned environmental compliance programs and regulatory permits including the National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit, and NPDES permit for discharge of treated wastewater to surface water, Sanitary Sewer Systems General Order, General Order for Recycled Water Use, Fats, Oils and Grease and Industrial Pretreatment Program source control programs, and Drinking Water permit. Performs and oversees a variety of complex tasks in the areas of environmental compliance monitoring reports and studies, water quality and environmental compliance activities, budget development, oversight of various consulting service contracts and agreements, environmental analysis, CEQA compliance and other related duties.

Project Manager: Under general direction of the Public Works Director, or his or her designee, plans, supervises, evaluates and participates in professional work in the planning, design, construction, maintenance and programming of services for citywide Capital Improvement Projects, streetscapes, landscaping, public facilities, utilities, parks, and other projects; performs complex analysis of project costs and monitoring project progress; performs complex analysis of

project costs and monitoring project progress; ensures safe work practices, work quality and accuracy; maintains appropriate work records; performs other related duties as required.

Senior Construction Manager: The Senior Construction Manager is a manager within the Public Works Department and exercises full responsibility for planning, organizing and directing the work activities of city-wide construction and Capital Improvement Projects (CIP). Under general direction, plans, manages, oversees and directs the operations and staff responsible for construction, inspection and project management.

Construction Superintendent: Under general direction, assists the division manager in planning, organizing and directing the work activities of citywide construction and Capital Improvement Projects (CIPs); and assists in supervising, managing, and directing the operations and staff responsible for construction, inspection and project management in the absence of the Senior Construction Manager.

Construction Inspector III: Under general supervision, performs the full array of duties assigned in the Construction Inspector series, including the most complex para-professional engineering, office and field work involving inspection in the public right-of-way, field testing and surveying; serves as technical expert in assigned field providing customer service to the public and other departments; provides responsible professional assistance to the Construction Superintendent, Senior Construction Manager, City Engineer or the Director of Public Works; performs other related duties as required.

Construction Inspector I/II: Under general supervision, learns to perform and performs the full array of duties assigned to classes in the Construction Inspector series, such as para-professional engineering, office and field work involving inspection, field testing and surveying; demonstrates a full understanding of all applicable policies, procedures and work methods associated with assigned duties; performs other related duties as required.

Community Services Supervisor: Under general direction, administers, plans, organizes the day-to-day operations of the Neighborhood & Community Services Department, which includes Animal Services, Code Compliance, and Community Services Divisions. Identifies workflow improvements, resolves customer service issues, prepares and monitors contracts and RFP's, and serves as a technical resource to other City personnel. Attends various meetings as a representative of the City. Responsibilities include overseeing compliance operations related with Federal, State and local ordinances and laws; oversees staff managing community outreach programs and educational services related to various community services in support of assigned divisions; performs complex inspections of residential, commercial, and industrial properties and transient businesses to determine compliance with applicable federal, state, and local codes, laws, regulations, and ordinances relating to maintenance of properties and structures and business licensing; initiates enforcement action and issues citations and notices; supervises special projects; coordinates the City's contracts for the sheltering, care and treatment of animals; provides work direction and lead supervision; performs other related duties as required by the City Manager, or his or her designee.

Community Services Officer III: Under general supervision, learns to perform and performs a full range of entry level to high-level administrative, technical, investigative and specialty work in support of the Neighborhood & Community Services Department. Responsibilities include, but are not limited to, planning and coordinating the day-to day operations, activities and special projects/assignments of the Animal Services, Code Compliance and Community Services Divisions, compliance operations related with Federal, State and local ordinances and laws, overseeing community outreach programs and educational services related to various community services in support of assigned divisions. Incumbents are required to work with and assist representatives from all departments; performing a variety of complex and responsible administrative support and project management; may work overtime, standby, during weekend, holidays, shift and call-back assignments; may work events or at the animal shelter as needed, and may perform other related duties as required and as assigned by the Community Services Supervisor, City Manager, or designee.

Community Services Officer I/II: Under general supervision, learns to perform and performs a full range of entry level to high-level administrative, technical, investigative and specialty work in support of the Neighborhood & Community Services Department. Responsibilities include, but are not limited to, planning and coordinating the day-to day operations, activities and special projects/assignments of the Animal Services, Code Compliance and Community Services Divisions, compliance operations related with Federal, State and local ordinances and laws, overseeing community outreach programs and educational services related to various community services in support of assigned divisions. Incumbents are required to work with and assist representatives from all departments; performing a variety of complex and responsible administrative support and project management; may work overtime, standby, during weekend, holidays, shift and call-back assignments; may work events or at the animal shelter as needed, and may perform other related duties as required and as assi$_{gn}$ed by the Community Services Supervisor, City Manager, or designee.

Finance Manager: Under general direction, manages and coordinates the City's purchasing functions, contract oversight and programs Citywide; plans, organizes and manages the fiscal activities and accounting services in support of programs for the Public Works Department; coordinates assigned activities with other divisions, outside agencies, and the general public; serves as a technical procurement and contract resource for the City's management staff and employees; provides independent oversight and management of purchasing and contract administration, oversees the work of assigned staff; performs other related duties as assigned.

Administrative Assistant III: Under general supervision, performs routine and complex tasks and duties assigned to classes within the Administrative Assistant series by providing office, clerical and administrative support to management staff, and other staff, in one or more departments as needed; interprets and applies policies, procedures and work methods associated with assigned duties; performs other related duties as required.

Administrative Assistant I/II: Under general supervision, learns to perform and performs routine and complex tasks and duties assigned to classes within the Administrative Assistant series by providing office, clerical and administrative support to management staff, and other staff, in one or more departments as needed; interprets and applies policies, procedures and work methods associated with assigned duties; performs other related duties as required.

Table A-1. Names and Phone Numbers of Staff Responsible for SSMP

Contact	Phone Number	Email Address
Stephen Salvatore, City Manager		
Michael King, Assistant City Manager (Acting Public Works Director, Legally Responsible Official)		
Brad Taylor, City Engineer		
Teresa Vargas, City Clerk		
Frank Vallejo, Utilities Superintendent		
Chris Hart, Utility Plant Supervisor		
Phil Humphrey, Utility Operator		
Henry Hernandez, Utility Operator		
Mauricio Zavaleta, Utility Operator		
Jesse Estrada, Utility Operator		
Jeremy Montoya, Utility Operator		
Damon Kalahele, Utility Operator		
Moses Vasquez, Utility Operator		
Joel Madrigal, Water Meter Reader		
Alejandro Garcia, Water Meter Reader		
Ken Reed, Senior Construction Manager		
Larry Backert, Construction Superintendent		
Jason Reyes, Construction Inspector		
Tyler Milton, Construction Inspector		

Contact	Phone Number	Email Address
Jonah Sonner, Compliance Engineer		
Greg Gibson, Senior Civil Engineer		
Angel Abarca, Assistant Engineer		
Bellal Nabizadah, Assistant Engineer		
Steven Hollenbeak, Assistant Engineer		
Carlos Carrillo, Management Analyst II		
Maria Lamas, Admin Assistant II		
Grace Manganaan, Admin Assistant II		
Bonnie Evans, Admin Assistant II		
Stephanie Rosillo-Silva, Admin Assistant I		
Paul Zolfarelli, VWNA (Plant Manager)		

Table A-2. List of City Staff Responsible for SSMP Elements

SSMP Element	Responsible Position(s)
I. Goals	Public Works Director
II. Organization	Public Works Director
III. Legal Authority	Public Works Director City Attorney
IV. Operations & Maintenance	Utilities Superintendent
V. Design and Construction Standards	City Engineer Construction Superintendent
VI. Spill Emergency Response Plan	Utilities Superintendent Compliance Engineer
VII. Blockage Control Program	Compliance Engineer
VIII. System Evaluation and Capacity Assurance	City Engineer Senior Civil Engineer Compliance Engineer
IX. Monitoring, Measurement, and Program Modifications	Compliance Engineer Administrative Assistant
X. SSMP Program Audits	Compliance Engineer Utilities Superintendent
XI. Communication	Compliance Engineer Administrative Assistant

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APPENDIX B – Element 3 (Legal Authority) Supporting Documents

1. Enforcement Response Plan – Enforcement of Sewer Use Ordinance
2. Enforcement Response Plan – Fats, Oils & Grease Source Control Program
3. Interjurisdictional Agreement Between the City of Manteca and The City of Lathrop.

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Appendix L

Enforcement Order Templates

City of Lathrop

Department of Public Works

390 Towne Centre Drive, Lathrop, CA 95330
Phone (209) 941-7430 – Fax (209) 941-7449
www.ci.lathrop.ca.us

IN THE MATTER OF
<<COMPANY NAME>>
<<Auth Rep NAME>>
<<ADDRESS>>

NOTICE OF VIOLATION

Permit #<<permit number>>

LEGAL AUTHORITY

Pursuant to Lathrop Municipal Code Chapter 13.26, *Sewer Use and Industrial Wastewater Regulations*, the City of Lathrop (City) has issued Wastewater Discharge Permit #<<permit number>> to <<COMPANY NAME>> in accordance with Section 13.26.050, *Wastewater Discharge Permits*.

FINDINGS

The City has reviewed the <<MONTH & YEAR>> Self-Monitoring Report submitted by <<name of Authorized Representative of permit holder>> and determined that the following pollutants are in violation of the numerical limits as specified by the above-referenced permit.

Parameter	Limit	Reported Value	Violations	
			Chronic *	TRC *

gpd = gallons per day; lbs/day = pounds per day; mg/L = milligrams per liter
*Chronic Violations are simple numerical values greater than the Limit. *TRC Violations are violations based on Technical Review Criteria.

NOTICE

Based on the above findings, <<COMPANY NAME>> is hereby notified that it is in violation of the terms and conditions of Wastewater Discharge Permit #<<permit number>> and Lathrop Municipal Code Chapter 13.26.

ORDER

THEREFORE, based on the above findings, <<COMPANY NAME>> is hereby ordered to take the following actions:

1. <<EXAMPLE: Evaluate the production for May 2005 to determine unusual operations that could have resulted in the high BOD reported for that date.>>

2. <<EXAMPLE: Report the results of the evaluation in the comments section of Monthly Self-Monitoring Report for the month of July 2005.>>

Signed:_____ Date: <<DATE>>
<< NAME/TITLE>>

City of Lathrop

Department of Public Works

390 Towne Centre Drive, Lathrop, CA 95330
Phone (209) 941-7430 – Fax (209) 941-7449
www.ci.lathrop.ca.us

IN THE MATTER OF
<<COMPANY NAME>>
<<Auth Rep NAME>>
<<ADDRESS>>

CONSENT ORDER

Permit #<<permit number>>

LEGAL AUTHORITY

Pursuant to Lathrop Municipal Code Chapter 13.26, *Sewer Use and Industrial Wastewater Regulations*, the City of Lathrop (City) has issued Wastewater Discharge Permit #<<permit number>> to <<COMPANY NAME>> in accordance with Section 13.26.050, *Wastewater Discharge Permits*.

FINDINGS

WHEREAS:

1. The City has conducted ongoing investigations of <<COMPANY NAME>> and have determined that <<COMPANY NAME>> has consistently violated the pollutant limits in the above-referenced permit.

2. <<OTHER FINDINGS>>

ORDER

THEREFORE, to ensure that <<COMPANY NAME>> is brought into compliance with its permit limits as soon as possible, it is hereby agreed and ordered that <<COMPANY NAME>> shall:

1. By <<MILESTONE DATE not to exceed 30 days>>, obtain the services of a licensed professional engineer specializing in wastewater treatment for the purpose of designing a pretreatment system which will bring <<COMPANY NAME>> into compliance with its wastewater discharge permit.

2. By <<MILESTONE DATE not to exceed 30 days from previous milestone date>> submit to the City an engineer's report with options for treating the discharge to permit standards with estimated capital and operating costs for each option.

3. By <<MILESTONE DATE not to exceed 30 days from previous milestone date>> submit a statement of decision to the City declaring the treatment option selected by <<COMPANY NAME>>.

4. By <<MILESTONE DATE not to exceed 30 days from previous milestone date>> submit an action plan for the design of the treatment system, funding of the capital costs, commencement of construction, completion of construction, and commencement of operations. This plan shall

provide milestone dates and routine status report due dates for the activities needed to design and build the treatment system.

5. <<COMPANY NAME>> shall pay $<<fine amount>> per day for each and every day it fails to comply with the terms of this order. The $<<fine amount>> per day penalty shall be paid to the City of Lathrop within five (5) days of assessment of the fine by the City.

6. In the event <<COMPANY NAME>> fails to comply with any of the deadlines set forth, <<COMPANY NAME>> shall, within one (1) working day after expiration of the deadline, notify the City in writing. This notice shall describe the reasons for <<COMPANY NAME>> failure to comply, the additional amount of time needed to complete the remaining work, and the steps to be taken to avoid future delays. This notification in no way excuses <<COMPANY NAME>> from its responsibility to meet any later milestones required by this order.

7. Compliance with the terms and conditions of this order shall not be construed to relieve <<COMPANY NAME>> of its obligation to comply with its wastewater discharge permit, which remains in full force and effect. The City reserves the right to seek any and all remedies available to it under the City's Municipal Code for any violation cited by this order.

8. Violation of this order shall constitute a further violation of the City's Municipal Code and subjects <<COMPANY NAME>> to all penalties described by Municipal Code Section 13.26.010.

9. Nothing in this order shall be construed to limit any authority of the City to issue any other orders or take any other action which it deems necessary to protect the wastewater treatment plant, the environment, or the public health and safety.

SIGNATORIES

FOR (Permittee Name)_____ Date_____

FOR THE CITY OF LATHROP_____ Date_____
<<Signature Authorized City Official Name/Title>>

City of Lathrop

Department of Public Works

390 Towne Centre Drive, Lathrop, CA 95330
Phone (209) 941-7430 – Fax (209) 941-7449
www.ci.lathrop.ca.us

IN THE MATTER OF
<<COMPANY NAME>>
<<Auth Rep NAME>>
<<ADDRESS>>

SHOW CAUSE ORDER

Permit #<<permit number>>

LEGAL AUTHORITY

Pursuant to Lathrop Municipal Code Chapter 13.26, *Sewer Use and Industrial Wastewater Regulations*, the City of Lathrop (City) has issued Wastewater Discharge Permit #<<permit number>> to <<COMPANY NAME>> in accordance with Section 13.26.050, *Wastewater Discharge Permits*.

FINDINGS

WHEREAS:

1. <<COMPANY NAME>> discharges process wastewater containing pollutants into the City's sanitary sewer system.

2. <<COMPANY NAME>> was issued a wastewater discharge permit on <<date>> that contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer system.

3. Pursuant to the above-referenced permit, data is routinely collected or submitted on the compliance status of <<COMPANY NAME>>.

4. This data shows that <<COMPANY NAME>> has violated its wastewater discharge permit in the following manner:

    a. <<COMPANY NAME>> has violated its permit limits for <<parameter(s)>> in each sample collected between <<start date>>, and <<end date>> for a total of <number of violations>> separate violations of the permit.

    b. <<COMPANY NAME>> has failed to submit a periodic compliance report due <<date>>.

    c. All of these violations satisfy the City's definition of significant noncompliance in Lathrop Municipal Code Section 13.26.090.

ORDER

THEREFORE, based on the above findings, <<COMPANY NAME>> is hereby ordered to:

1. Appear at a meeting with the Director of Public Works to be held on <<date and time>> at <<ADDRESS>>.

2. At this meeting, <<COMPANY NAME>> must demonstrate why the City should not pursue a judicial enforcement action against <<COMPANY NAME>> at this time.

3. This meeting will be closed to the public.

4. Representatives of <<COMPANY NAME>> may be accompanied by legal counsel if they so choose.

5. Failure to comply with this order shall also constitute a further violation of the Lathrop Municipal Code and may subject <<COMPANY NAME>> to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.

6. This order, entered this _____ day of <<MONTH/YEAR>>, shall be effective upon receipt by <<COMPANY NAME>>.

Signed _____ Date:_____
<<Signature Authorized City Official Name/Title>>

RR # <<Return Receipt Number from Certified Mail>>

City of Lathrop

Department of Public Works

390 Towne Centre Drive, Lathrop, CA 95330
Phone (209) 941-7430 – Fax (209) 941-7449
www.ci.lathrop.ca.us

IN THE MATTER OF
<<COMPANY NAME>>
<<Auth Rep NAME>>
<<ADDRESS>>

COMPLIANCE ORDER

Permit #<<permit number>>

LEGAL AUTHORITY

Pursuant to Lathrop Municipal Code Chapter 13.26, *Sewer Use and Industrial Wastewater Regulations*, the City of Lathrop (City) has issued Wastewater Discharge Permit #<<permit number>> to <<COMPANY NAME>> in accordance with Section 13.26.050, *Wastewater Discharge Permits*.

FINDINGS

WHEREAS:

1. <<COMPANY NAME>> discharges process wastewater containing pollutants into the City's sanitary sewer system.

2. <<COMPANY NAME>> is a "significant industrial user" as defined by Lathrop Municipal Code Section 13.26.010.

3. <<COMPANY NAME>> was issued a wastewater discharge permit on <<date issued>>, which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the sanitary sewer system.

4. Pursuant to the above-referenced permit, data is routinely collected or submitted on the compliance status of <<COMPANY NAME>>.

5. This data shows that <<COMPANY NAME>> has violated its wastewater discharge permit in the following manner:

    a. <<COMPANY NAME>> has violated its permit limits for <<parameter(s)>> in each sample collected between <<start date>>, and <<end date>> for a total of <number of violations>> separate violations of the permit.

    b. <<COMPANY NAME>> has failed to submit all periodic compliance reports due since report due date>>.

    c. All of these violations satisfy the City's definition of significant noncompliance in Lathrop Municipal Code Section 13.26.090.

ORDER

THEREFORE, based on the above findings, <<COMPANY NAME>> is hereby ordered to:

1. Within 180 days, install pretreatment technology that will adequately treat <<COMPANY NAME>> wastewater to a level that will comply with its wastewater discharge permit.

2. Within five (5) days, submit all periodic compliance reports due since <<report due date>>.

3. Within fifteen (15) days, pay to the City a fine of $<<amount of fine>> for the above-described violations in accordance with Municipal Code Section 13.26.010.

4. Report, on a monthly basis, the wastewater quality and corresponding flow and production information as described on page __ of the wastewater discharge permit for a period of one year from the effective date of this order.

5. All reports and notices required by this order shall be sent, in writing, to the following address:

   <<NAME, TITLE>>
   City of Lathrop
   390 Towne Centre Dr.
   Lathrop, CA 95330

6. This order does not constitute a waiver of the wastewater discharge permit, which remains in full force and effect. The City reserves the right to seek any and all remedies available to it under the City's Municipal Code for any violation cited by this order.

7. Failure to comply with this order shall also constitute a further violation of the Lathrop Municipal Code and may subject <<COMPANY NAME>> to civil or criminal penalties or such other appropriate enforcement response as may be appropriate.

8. This order, entered this ____ day of <<Month/Year>>, shall be effective upon receipt by <<COMPANY NAME>>.

Signed _____ Date: _____
<<Signature Authorized City Official Name/Title>>

RR # <<Return Receipt Number from Certified Mail>>

City of Lathrop

Department of Public Works

390 Towne Centre Drive, Lathrop, CA 95330
Phone (209) 941-7430 – Fax (209) 941-7449
www.ci.lathrop.ca.us

IN THE MATTER OF
<<COMPANY NAME>>
<<Auth Rep NAME>>
<<ADDRESS>>

CEASE-AND-DESIST ORDER

Permit #<<permit number>>

LEGAL AUTHORITY

Pursuant to Lathrop Municipal Code Chapter 13.26, *Sewer Use and Industrial Wastewater Regulations*, the City of Lathrop (City) has issued Wastewater Discharge Permit #<<permit number>> to <<COMPANY NAME>> in accordance with Section 13.26.050, *Wastewater Discharge Permits*.

FINDINGS

WHEREAS:

1. <<COMPANY NAME>>discharges process wastewater containing pollutants into the City's sanitary sewer system.

2. <<COMPANY NAME>> is a "significant industrial user" as defined Lathrop Municipal Code Section 13.26.010.

3. <<COMPANY NAME>> was issued a wastewater discharge permit on <<issued date>> which contains prohibitions, restrictions, and other limitations on the quality of the wastewater it discharges to the City sanitary sewer.

4. Pursuant to the above referenced permit, data is routinely collected or submitted on the compliance status of <<COMPANY NAME>>.

5. This data shows that <<COMPANY NAME>> has violated the wastewater discharge permit in the following manner:

    a. Continuous violations of permit limits for <<identify parameter>> in each sample collected between <<beginning date>> and <<ending date>>.

    b. Failure to comply with an administrative compliance order requiring the installation of a pretreatment system and the achievement of compliance with its permit limits by <<milestone date>>.

    c. Failure to appear at a show cause hearing pursuant to an order requiring said attendance.

ORDER

THEREFORE, based on the above findings <<COMPANY NAME>> is hereby ordered to:

1. Within 24 hours of receiving this order, cease all non-domestic discharges into the City's sanitary sewer system. Such discharges shall not recommence until such time as <<COMPANY NAME>> is able to demonstrate that it will comply with the above-reference permit.

2. Failure to comply with this order may subject <<COMPANY NAME>> to having its connection to the sanitary sewer sealed by the City and assessed the costs therefore.

3. Failure to comply with this order shall also constitute a further violation of the Lathrop Municipal Code and subject <<COMPANY NAME>> to civil or criminal penalties or such other enforcement as may be appropriate.

4. This order, entered this ____ day of <<month, year>>, shall be effective upon receipt by <<COMPANY NAME>>.

Signed:_____ Date: <<DATE>>
<< NAME/TITLE>>

RR # <<Return Receipt Number from Certified Mail>>

City of Lathrop

Department of Public Works

390 Towne Centre Drive, Lathrop, CA 95330
Phone (209) 941-7430 – Fax (209) 941-7449
www.ci.lathrop.ca.us

SUSPENSION OF WASTEWATER SERVICE ORDER

Date of Notice _____

Business or Individual _____

Address _____

Person Contacted/Title _____

Lathrop Municipal Code Section Violation _____

Results of Analysis _____

Due to the serious nature of your violation, the City of Lathrop is ordering you to immediately stop the discharge of process wastewater, and to eliminate any further industrial discharging by 5:00 pm _____ _____.

<<date>>

In the event of your failure to voluntarily comply with this suspension order, the City shall take such steps as deemed necessary including, but not limited to, the immediate severance of your sewer connection, to prevent or minimize damage to our wastewater treatment system or endangerment to any individuals.

_____ Refused to sign ____ (initials)
Signature of person contacted

_____, _____
Signature of City Representative Date

RR # <<Return Receipt Number from Certified Mail>>

City of Lathrop, California

ENFORCEMENT RESPONSE PLAN

Fat, Oil & Grease Source Control Program

Enforcement of Lathrop Municipal Code Chapter 13.26.160
(Sewer Use Ordinance #05-254)

City of Lathrop

ENFORCEMENT RESPONSE PLAN

Fat, Oil & Grease Source Control Program

Contents

City of Lathrop
ENFORCEMENT RESPONSE PLAN
Fat, Oil & Grease Source Control Program

I - INTRODUCTION

The City of Lathrop adopted Ordinance #05-254 amending Chapter 13.26.160 of the Lathrop Municipal Code (LMC). This ordinance established General Sewer Use Regulations including the adoption of Fat, Oil, and Grease (FOG) Control Regulations applicable to Food Service Establishments (FSEs).

Under this code the City has the authority to enter FSEs to conduct inspections and sampling as required to confirm compliance to the City Codes. This code also establishes mandatory maintenance of grease interceptors and the City's authority to take appropriate enforcement actions for failure to comply with the codes.

The Director of Public Works is responsible for the implementation and enforcement of this ordinance. Certain functions required to implement the ordinance are delegated to various staff and contract services by the Director of Public Works. This Enforcement Response Plan constitutes the policies and procedures that will be used to enforce the City's fat, oil and grease ordinance under the authority of the Public Works Director.

The FOG Enforcement Response Plan is directed at the enforcement of the FOG regulations. A separate Enforcement Response Plan has been established for the enforcement of the industrial user regulation contained in the City Code.

II - PURPOSE OF THE FOG ERP

The purpose of the FOG Enforcement Response Plan is to provide uniform and consistent enforcement of the City Codes using a variety of enforcement options that are available to the City. This will allow the City to be flexible in their response to a violation and to provide guidance in responses to assure the response is appropriate to the type of violation that occurred.

III - FOG CONTROL PROGRAM OFFICIALS/STAFF

Director of Public Works	***- 209-941-7430***
City Attorney	***- 209-941-7235***
City Compliance Engineer	***- 209-941-7430***
Chief Plant Operator (VWNA)	***- 209-858-1645***
FOG Inspectors (Compliance First)	***- 209-625-8786***

IV - ORDINANCE PROVISIONS

Ordinance	Provision
13.26.160.A.	Findings (Purpose)
13.26.160.B.	Applicability
13.26.160.C.	Definitions
13.26.160.D.1.	Grease Interceptor/Trap Required
13.26.160.D.2.	Existing Facilities
13.26.160.D.3.	New Facilities or New Interceptor Installations
13.26.160.E.1.	Maintenance of Grease Interceptor/Traps Required
13.26.160.E.2.	Routine Maintenance Schedules
13.26.160.E.3.	Record Keeping Requirements
13.26.160.E.4.	Record Retention Requirements
13.26.160.F.	Disposal of Interceptor/Trap Wastes
13.26.160.G.	Collection, Storage, and Disposal of Waste Grease and Solids
13.26.160.H.	Clean up of Spilled Grease and Oil
13.26.160.I.	Use of Chemicals and Other Additives
13.26.160.J.	Right of Access
13.26.160.K.	Enforcement
13.26.160.K.1.	Mandatory Interceptor/Trap Service
13.26.160.K.2.	Mandatory Interceptor/Trap Service Schedule
13.26.160.K.3.	Cost Recovery
13.26.160.K.4.	Administrative Fines
13.26.160.K.5.	Emergency Suspensions

V - ENFORCEMENT RESPONSES

A. Levels of Response

There are three possible levels of response to all violations available to the City:

Level 1 – Education and Training
Level 2 – Informal Enforcement
Level 3 – Formal Enforcement

B. Response Actions

Level 1 responses are the most common enforcement tool used in the FOG program. A Level 1 response typically includes providing the user with a copy of the ordinance, and a summary of the FOG Program requirements, information on best management practices, and a brief discussion on the proper maintenance of the interceptor or trap used by the facility (a copy of the City's FSE best management practice hand-out is included in Part X of this ERP). It also includes an inspection and the gathering of general and specific information about the facility, the owner/operators, the interceptors installed at the facility, and the current maintenance practices. A Level 1 response is intended to inform the user of their responsibilities,

provide them with sufficient information to develop an effect maintenance program, and then to allow them time to attain compliance. A Level 1 response will always be followed up with inspections following an adequate amount of time for the user to develop and implement their maintenance plan.

Level 1 – Responses

- Educate, Inform, Train
- Data Gathering
- Inspection

Level 2 responses are considered an escalation of enforcement. A Level 2 response is an appropriate response for the failure of the user to develop an appropriate maintenance plan (schedule), especially following a Level 1 action. A Level 2 response is typically a mandatory pumping order, requiring the user to hire a grease trap cleaning service to pump the interceptor and clean it within a specified time frame and to submit copies of the cleaning service pumping/transport manifest to document the service was performed. A Level 2 response may include a mandatory requirement that a licensed plumber be hired to inspect the grease interceptor when the cleaning service pumps down the interceptor to confirm the interceptor is properly installed and that none of the fittings and fixtures are damaged, broken, or missing. Level 2 responses require that mandatory actions be taken within a specified time period and that the results of the action be reported to the FOG Control Program Manager within a specified time period. Level 2 responses do not include the assessment fines or penalties. Level 2 responses are intended to mandate a corrective action to be taken by the user, at the user's expense.

Level 2 – Responses

- Mandatory Cleaning of Interceptor
- Mandatory Inspection of Interceptor by Licensed Plumber
- Mandatory Repair of Damaged Interceptor
- Mandatory Reporting

Level 3 responses are considered an escalation of enforcement. A Level 3 response is an appropriate response for the user who refuses to conform to the ordinance and avoids or ignores Level 1 and Level 2 enforcement actions. A Level 3 response will typically include the mandatory actions that would be taken under a Level 2 response with the addition of an administrative fine and/or prescribe additional penalties if the user fails to perform the mandatory requirements. A Level 3 response may include a mandatory interceptor cleaning and reporting requirement that must be followed on a permanent (on-going) basis.

Level 3 – Responses

- Mandatory On-Going Interceptor Cleaning and Reporting Schedule (example: monthly, quarterly, semi-annual)
- Mandatory Reconfiguration of plumbing to interceptor by Licensed Plumber (interceptor installed backwards, dishwasher

discharge redirected from interceptor, removal of food grinder (garbage disposal), etc.

- Mandatory replacement of undersized interceptor with properly sized interceptor.
- Mandatory installation of interceptor in the discharge of an Existing Food Service Facility.
- Assessment of Administrative Fines.
- Halt discharge to City Sewer System.
- Civil Legal Action.
- Criminal Legal Action.

C. Sequence of Actions

The City is not bound to taking the Level of Response in any sequential order. The City may use a combination of the actions recommended in different response levels. The City may take a Level 2 or a Level 3 as their first enforcement response based on the severity and the impact the violation had on the City sewer system and the community health and safety.

VI - ADMINSTRATIVE FINES

It is not the intent of the FOG ERP to discuss how to assess and collect administrative fines. Other sections of the City Codes provide authority and protocols for the City to assess fines. In addition, the City's Sewer Use Ordinance ERP provides a discussion of assessing administrative fines for the City's pretreatment program. A brief discussion of when to assess an administrative fine under the FOG control program is provided herein.

Administrative fines are meant to be punitive in nature and are not related to cost recovery for expenses accrued by the City to abate the results of the non-compliance to the ordinances. Fines are not intended to replace enforcement actions that are directed at correcting the problem and bringing the user into compliance with the ordinances. The City must not assess a fine in excess of $1,000 per day per violation as established by State law. The assessment of fines is usually reserved for those users who demonstrate a persistent pattern of non-compliance. The City should carefully consider the use of a fine and its ability to make non-compliance to the ordinance less profitable for the offender.

VII - COST RECOVERY

The City may assess cost recovery fees to users whose non-compliance resulted in damages or restrictions to the City systems that resulted in expenses to the City above and beyond the normal operational and maintenance costs associated with the system. As this applies to the FOG control program there are two specific cases that the City may wish to assess cost recovery fees to a user regulated under this ordinance.

(1) Build up of FOG in the collection line as a result of improper maintenance of a grease

interceptor that requires the City to clean that section of line more often than once every 2 years.

(2) Cost related to the clean up of a Sanitary Sewer Overflow caused by the blockage to flow in the sanitary sewer line caused by improper maintenance of the grease interceptor servicing one or more users discharging to the blocked sewer line.

Cost recovery may be assessed on a one-time basis, which would be appropriate for a single sanitary sewer overflow event; or as an on-going surcharge on users of a specific line that services one or more FOG user. Cost recovery is not intended to be an enforcement tool, but a means to recovering costs due to negligence on the part of a user, who has received a Level 1 enforcement response in the past.

VIII - TERMINATION OF WATER SERVICES

The City provides both sewer and water to the food service establishments. Therefore, the City may terminate water service as an ultimate enforcement tool. If a user fails to comply with the City ordinance, and is persistently in non-compliance even though the City has taken enforcement actions at the Level 1, 2 and 3, then the City may terminate water services. This is not an action to be taken lightly for it will mean that the business can no longer operate in the City.

Restoration of water service should only be granted upon documentation that the non-compliant issues have been resolved and that consistent compliance may be expected in the future. In addition, all previous enforcement actions and administrative fines and cost recovery assessments must be paid prior to restoration of service.

IX - NOTIFICATION OF HEALTH DEPARTMENT

When in opinion of the City, a user grease interceptor is backing up causing a potential health hazard, the City is required to notify the County Health Department of the food service facility and the situation with the potential health risk.

X - SAMPLE DOCUMENTS

The following documents are samples of documents that are used in the enforcement of the City FOG Control Ordinance.

FOOD SERVICE GREASE INTERCEPTOR/TRAP INSPECTION REPORT

Inspection type: Routine ☐ *Re-Inspection* ☐

Facility Information

Business Name: _____ Business Owner: _____

Business Location: _____ Owner Address / Phone #: _____

Mailing Address: _____

Manager's Name: _____ Local Business Phone #: _____

Facility Inspection

Type of Device(s) Installed: Grease Trap ☐ Grease Interceptor ☐ Recycled Grease Bin ☐

Frequency of Interceptor/Trap Service? _____ Device Capacity (Gallons): _____

Name / Address of Service Company: _____

Visual Observations of Device:

Frequency of Recycled Grease Service? _____ Recycled Bin Capacity (Gallons): _____

Name / Address of Service Company: _____

Visual Observations of Device:

Are additives added to the interceptor / trap? YES ☐ NO ☐ N/A ☐

Food Grinders or Garbage Disposal installed and discharging to interceptor/trap? YES ☐ NO ☐ N/A ☐

Automatic Dishwasher installed and discharging to Device? YES ☐ NO ☐ N/A ☐

Are Best Management Practices Implemented? YES ☐ NO ☐ N/A ☐

Provide the following information on the three most recent service records:

Pumping Date	Volume Pumped (Gallons)	Pumping Service Name	Pumping Service State Registration No.	Disposal Site Name	Disposal Site State Registration No.

List all Deficiencies:

List all Recommendations or Required Actions as a result of this inspection:

Inspector Name: _____ Signature: _____

Inspection Date: _____

Form Current: 05/24/2024

City of Lathrop

Public Works Department

390 Towne Centre Dr. – Lathrop, CA 95330
Phone (209) 941-7430 – Fax (209) 941-7449
www.ci.lathrop.ca.us

June 17, 2025

[Business Name]
ATTN: Facility or Store Manager
[Address]
[City, State, Zip]

RE: NOTICE TO COMPLY – MAINTENANCE OF GREASE INTERCEPTOR/TRAP REQUIRED

To Whom it May Concern,

On [DATE], a grease interceptor/trap inspection was conducted at **[FACILITY]** in accordance with Lathrop Municipal Code Section 13.26.160 - Fat, oil and grease control.

During the inspection, [DESCRIBE REPORT]. Per Lathrop Municipal Code Section 13.26.160(E), all grease interceptors and grease traps shall be continuously maintained in a satisfactory and effective operational condition by the discharger. All spilled grease and oil shall be cleaned up and disposed of in the grease container. In no instance shall spilled grease and oils be washed to the storm drain system.

In response to these findings, you are hereby directed to [COMPLIANCE ACTION AND DATE]. Failure to respond to this notice will result in a re-inspection of your facility and may be subject to administrative fines pursuant to Section 13.26.160(K)4. A copy of the inspection report is enclosed with this notice.

If you have any questions regarding the requirements of the City's FOG Control Program, please contact Jonah Sonner, the City's Compliance Engineer, at (209) 941-7443 or by email at jsonner@ci.lathrop.ca.us.

Sincerely,

Brad Taylor
City Engineer

BT/js
Enclosure:
2023 12 07 Food Service Grease Interceptor/Trap Inspection Report

INTERJURISDICTIONAL PRETREATMENT AGREEMENT
BETWEEN
THE CITY OF MANTECA
AND
THE CITY OF LATHROP

This Agreement is entered into this 17th day of OCTOBER 2005, between the City of Manteca, hereinafter called "Manteca" and the City of Lathrop, hereinafter called "Lathrop".

RECITALS

1. Whereas, Manteca owns and operates a wastewater treatment system.

2. Whereas, Lathrop currently utilizes this wastewater treatment system pursuant to the Service Agreement (Agreement *A765)* between Manteca and Lathrop dated March *5,* 1984. Such use is called, for purposes of this Agreement, "use of the WQCF system".

3. Whereas, Lathrop additionally owns and operates a second wastewater system, called, for purposes of this Agreement, the "WRP System".

4. Whereas, Facilities located in Lathrop currently contribute wastewater to the WQCF system, which includes industrial waste. These facilities are hereinafter referred to as industrial dischargers.

5. Whereas, Manteca must develop and implement an industrial pretreatment program to control industrial dischargers of its wastewater treatment system pursuant to conditions contained in its waste discharge permit (NPDES Permit No. CAOO8 1558 issued by the EPA), and the pretreatment requirements set out in 40 CFR Part 403 and Division 7 of the California Water Code.

6. Whereas, Lathrop desires to continue to utilize the WQCF system and recognize its industrial waste control obligations under 40 CFR 403, Division 7 of the California Water Code, and Agreement A765. In Agreement A765, Lathrop agreed to adopt and maintain a waste ordinance that is uniform and consistent with the Manteca waste ordinance so that the industrial dischargers to the WQCF system within Lathrop' s boundaries shall be subject to the necessary pretreatment controls. With this interjurisdictional agreement, Manteca is authorized to implement and enforce that waste ordinance within Lathrop's boundaries, with respect to those industrial dischargers whose waste flows to the WQCF system.

AGREEMENT

1. Lathrop shall adopt a waste ordinance that is at least as stringent as to the waste ordinance adopted by Manteca. Lathrop shall forward to Manteca for review a draft of its proposed waste ordinance within *(30)* days of the date of this agreement. Lathrop shall adopt its waste ordinance within *(30)* days of receiving approval from Manteca of its content.

2. Whenever Manteca revises its waste ordinance, it shall forward a copy of the revisions to Lathrop. Lathrop shall adopt similar revisions to its waste ordinance. Lathrop shall forward to Manteca for review its proposed revision within *(30)* days of receipt of the Manteca revisions. Lathrop shall adopt its revisions within *(30)* days of receiving approval from Manteca of the content thereof.

3. Lathrop shall adopt pollutant specific local limits which include the same pollutant parameters and limits that are as stringent as the local limits enacted by Manteca within *(30)* days of the date of this agreement. If Manteca makes any revision or additions to its local limits, Manteca shall forward to Lathrop a copy of such revisions within 10 days of enactment thereof. Lathrop shall adopt any such revisions or additions within *(30)* days of receipt thereof

4. Lathrop designates Manteca as the agent of Lathrop for the purposes of implementation and enforcement of Lathrop' s waste ordinance against industrial dischargers to the WQCF system located in Lathrop. Manteca may take any action under Lathrop's waste ordinance that could have been taken by Lathrop, including the enforcement of the ordinance in courts of law.

   Manteca, on behalf of and as agent for Lathrop, shall perform technical and administrative duties necessary to implement and enforce Lathrop's waste ordinance. Manteca shall: (1.) issue permits to all industrial dischargers to the WQCF system required to obtain a permit; (2.) conduct inspections, sampling, and analysis; (3.) take all appropriate enforcement action outlined in Manteca' s enforcement response plan and provided for in Lathrop's waste ordinance; and (4.) perform other technical and administrative duties required by Federal and State law or NPDES permit. In addition, Manteca may, as agent of Lathrop, take emergency action to stop or prevent any discharge to the WQCF system for an industrial user which presents or may present an imminent danger to the health or welfare of humans, which reasonably appears to threaten the environment, or which threatens to cause interference, pass through, or sludge contamination.

6. Manteca shall maintain an industrial user inventory of permitted and non-permitted industrial and commercial facilities discharging to the WQCF system. Manteca shall update the industrial user inventory annually and provide a copy of the inventory to Lathrop by December $_{1st}11$ of each year. The industrial user inventory shall contain the name of the industrial user, the address, telephone number of the facility, the standard

industrial classification (SIC), and identify the product or service provided by the facility. Lathrop shall notify Manteca of any additional planned industrial waste discharges to the WQCF system thirty days before commencement of the discharge.

7. Before any industrial user located outside the jurisdictional boundaries of Lathrop discharges into the WQCF Sewer system, Lathrop and Manteca shall enter into an agreement with the jurisdiction in which such industry is located. Such agreement shall be substantially equivalent to this Agreement and must be entered into prior to a discharge from any such industrial user.

8. Manteca may recover costs for permitting, inspecting, sampling, and other industrial user monitoring and enforcement activities directly from the industrial dischargers located within Lathrop' s jurisdiction.

9. If any term of this Agreement is held to be invalid in any judicial action, the remaining terms shall be unaffected.

10. Manteca and Lathrop shall review and revise this Agreement to ensure compliance with the Federal Clean Water Act (42 U.S.C. § 1251 et seq.) and rules and regulations (see 40 CFR part 403) issued thereunder, as necessary, but at least once every 5 years on a date to be determined by Manteca and Lathrop.

11. This Agreement shall remain in effect so long as Agreement A765 remains in effect. Termination of the Agreement A765 shall also result in the termination of this Agreement.

12. If the authority of Manteca to act as agent for Lathrop under this Agreement is questioned by an industrial user, court of law, or otherwise, Lathrop shall take whatever action is necessary to ensure the implementation and enforcement of its waste ordinance against its industrial dischargers, including, but not limited to, implementing and enforcing its waste ordinance on its own behalf and/or amending this Agreement to clarify Manteca's authority.

13. Any disputes between Manteca and Lathrop arising out of this Agreement shall be submitted to binding arbitration performed in accordance with the rules of American Arbitration Association.

CITY OF LATHROP

GLORYANNA RHODES, MAYOR

CITY OF MANTECA

WILLIE W. WEATHERFORD, MAYOR

ATTEST:

RICK CALDEIRA, LATHROP CITY CLERK

JOANN L. TILTON, MANTECA CITY CLERK

APPROVED AS TO FORM AND EXECUTION:

JOHN STOVALL, LATHROP CITY ATTORNEY

JOHN D. BRINTON, MANTECA CITY ATTORNEY 10-6-05

APPENDIX C – Element 4 (Operations & Maintenance Program) Supporting Documents

1. Figure C-1. City of Lathrop Wastewater Infrastructure
2. Figure C-2. City of Lathrop Sewer Collection Systems and Pump Station Drainage Areas
3. Wastewater Gravity Main Hydroflushing Form
4. Daily Lift Station Inspections Report Form
5. Pump Inspection Report Form
6. 12-Inch Force Main to Manteca Inspection Report
7. Air/Vacuum Release Valve Report
8. Table C-1. Wastewater Pump Station Pump and Motor Information

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North Harlan PS
Valley Crossings LS
Stonebridge PS
DE LIMA RD
Sharpe PS (Private)
DOS REIS RD
Woodfield LS
LATHROP RD
Stanford Crossing PS
California Natural Products PS (Private)
J St. PS
GOLDEN VALLEY PKWY
Mossdale PS
McKinley Ave PS
Louise Ave PS
RIVER ISLANDS PKWY
LOUISE AV
Easy Ct LS
O St. PS
SSI PS (Private)
MCKINLEY AV
River Islands 2A PS
Lathrop CTF
LIP LS (Private)
YOSEMITE AV
Lathrop Gateway PS
MWQCF Flow Meter
Crossroads PS
MWQCF
River Islands Main PS
South Lathrop PS

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Legend

- Sphere of Influence
- Approximate Area of WWTF
- Pump Station or Lift Station

Gravity Main Diameter, Inches

- <= 4
- 6
- 8
- 10
- 12
- 14 - 16
- 18
- 20 - 21
- 24
- > 30

Force Main Diameter, Inches

- <= 4
- 6
- 8
- 10
- 12
- 14 -16
- 18
- 20 - 21
- 24
- > 30

Abbreviations

CTF	= Consolidated Treatment Facility
LIP	= Lathrop Industrial Park
LS	= lift station
MWQCF	= Manteca Water Quality Control Facility
PS	= pump station
SSI	= Super Store Industries
WWTF	= wastewater treatment facility

Notes

1. All locations are approximate.

Sources

1. Aerial photograph provided by ESRI's ArcGIS Online, 12 June 2025.

N

0 3,000 6,000

(Scale in Feet)

City's Wastewater Infrastructure

Sewer System Management Plan
City of Lathrop
Lathrop, CA
June 2025
C50013.00

Figure 3-1

eki environment & water

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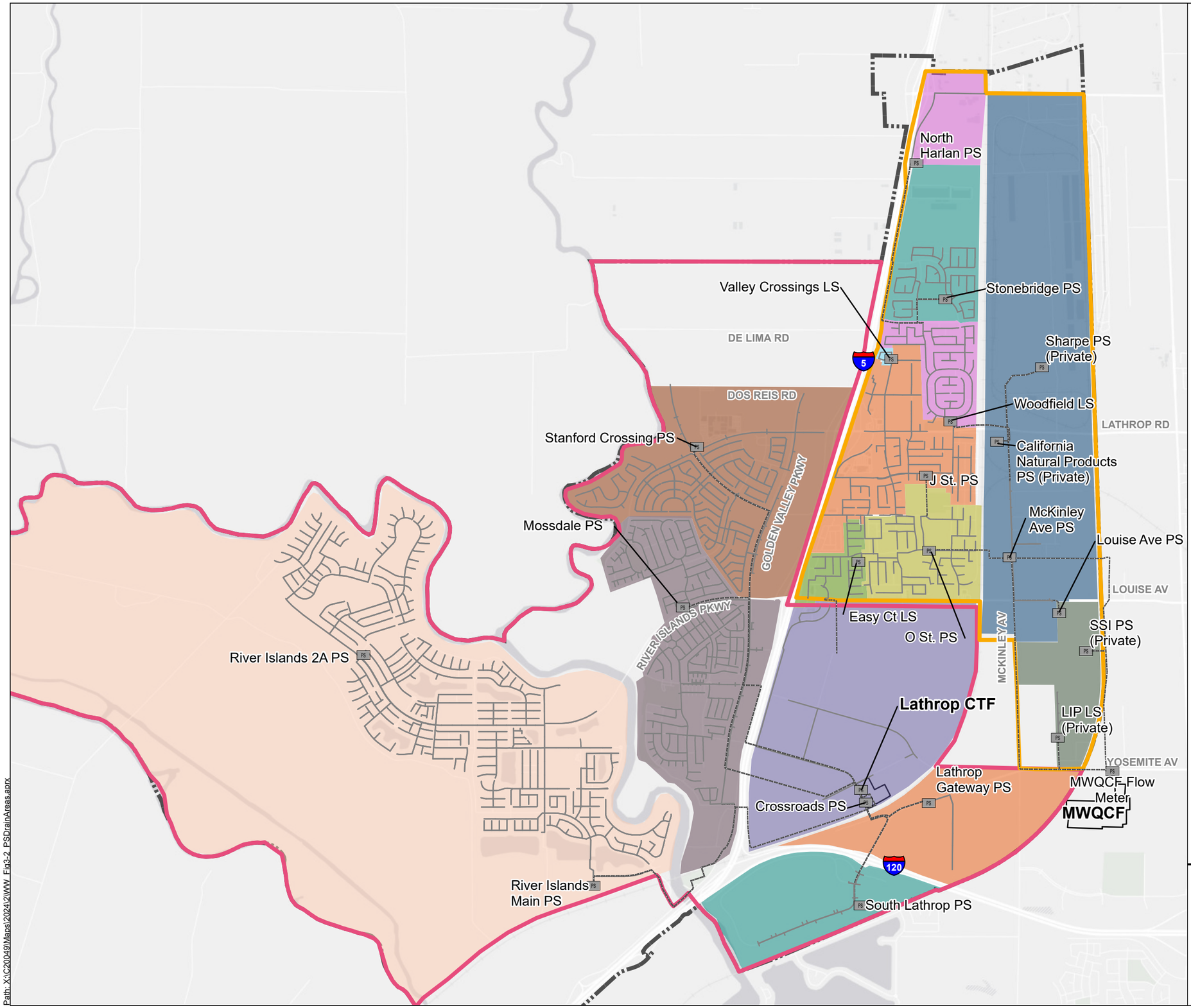

Legend

- Sphere of Influence
- Approximate Area of WWTF
- Pump Station or Lift Station
- Force Main
- Gravity Main

WWTP Drainage Area Boundaries

- Lathrop CTF Collection System
- MWQCF Collection System

Pump Station Drainage Areas

- Stanford Crossing
- Crossroads
- Easy Ct
- J St
- Lathrop Gateway
- Manteca
- McKinley
- Mossdale
- O St
- River Islands
- South Lathrop
- Stonebridge
- Valley Crossing
- Woodfield

Abbreviations

CTF	= Consolidated Treatment Facility
LIP	= Lathrop Industrial Park
LS	= lift station
MWQCF	= Manteca Water Quality Control Facility
PS	= pump station
SSI	= Super Store Industries
WWTF	= wastewater treatment facility

Notes

1. All locations are approximate.

Sources

1. Aerial photograph provided by ESRI's ArcGIS Online, 12 June 2025.

N

0 3,000 6,000

(Scale in Feet)

City's Sewer Collection Systems and Pump Station Drainage Areas

Sewer System Management Plan
City of Lathrop
Lathrop, CA
June 2025
C50013.00

Figure C-2

eki environment & water

Path: X:\C20049\Maps\2024\2\WW_Fig3-2_PSDrainAreas.aprx

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CITY OF LATHROP
WASTEWATER GRAVITY MAIN HYDROFLUSHING FORMS

(Example Excel Template)

Wastewater Gravity Main Hydroflushing											
MWQFC				WRP 1 (CTF)				Hot Spots			
Total Feet		Total Miles		Total Feet		Total Miles		Total Feet		Total Miles	
0		0.0		0		0.0		0		0.0	
Date	Feet	Date	Feet	Date	Feet	Date	Feet	Date	Feet	Date	Feet

Date	Originating Manhole								Direction	Distance	Receiving Manhole			
	Location	Size	Mat.	Cond.	Invert depth	# of Drops	# of Inf/Eff	# of Lat.	Circle One		Location	Invert Depth	# of Lat.	Drop?
									Uptream Downstream					
									Uptream Downstream					
									Uptream Downstream					
									Uptream Downstream					
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	Page Total Distance in Feet									Feet	Operator(s)			

CITY OF LATHROP
DAILY LIFT STATION INSPECTION REPORT FORM
(Example Excel Template)

Station Report

Wastewater Station **Year:**

Date	Wet Well Level A	Wet Well Level B	Active Alarms	Pump Breakers	Motor VFDs	Test Run Pumps	Wet Well Condition	Initials

Security Inspection

Wastewater Station **Year:**

Date	Alarm System	Security Cameras	CCTV Cameras	Padlocks	Gate	Fencing / Walls	Exterior Doors	Exterior Lighting	Initials

Inspection 1

Wastewater Station **Year:**

Date	OIT Operation	Subm. Level Tansmitter	Ultrasonic Level Tansmitter	Floats / Probes	A/C	Chlorine Tank Level	Chemical Pump 1	Chemical Pump 2	Twister	Initials

Inspection 2

Wastewater Station **Year:**

Date	Check Valves	Isolation Valves	Air Release Valves	Vaults	Vault Exhaust Fans	Genset	Exercised Genset	Initials

CITY OF LATHROP
DAILY LIFT STATION INSPECTION REPORT FORMS (CONT.)
(Example Excel Template)

Housekeeping

Wastewater Station **Year:**

Date	Electrical Panels	Electrical Outlets	Piping / Valves / Meters	Compound Cleanliness	Weed Abatement				Initials

Generator Inspection Checklist

Automatic Exercising Schedule:
Weekly-
Time:
Duration:

Station Name **Permit # N-xxxx-x-x** **Year:**

Date	Starting Totalizer	Ending Totalizer	Auto Exercising Hours	Emergency Hours	Maint. Hours	Fuel Level	Oil Level	Battery Level	Water Level	Transfer Switch	Initials
Previous											

CITY OF LATHROP
PUMP INSPECTION REPORT

Lift Station: _____

Pump # _____ Nameplate Info: _____

Model #: _____ SN #: _____

KW: _____ HP: _____ Volts: _____ Amps: _____

Phase: _____ HZ: _____ RPM: _____

Date of Inspection: _____ Operator: _____

Start Time: _____ Finish Time: _____

1. Pump Inspection

Oil Level		Oil Condition		Oil Added		Wear Ring	
Case Cond.		Volute Cond.		Lift Strap		Guide Bar	
Pull Cable		Cord Seal		Cord Cond.		Wet Well	
Noise?		Vibration?		Bubbler Cond.		Float Cond.	

2. Electrical Panel Inspection

Panel Clean?		Panel Door Seal		Panel Warning Light	
HOA Switch		Starter Noise?		Overload Setting	
Amperage Draw, T1		T2		T3	
Heat Discoloration?					

List Discrepancies, Corrections Made, Comments, and Recommendations:

_____

_____

_____

_____

Reviewed By: _____

Action Taken: _____

_____

Forwarded To: ☐ **File** ☐ **Supervisor** ☐ **P.W. Director**

CITY OF LATHROP
12 INCH FORCE MAIN TO MANTECA INSPECTION REPORT

Operator(s): _____

Date: _____

Evidence of Leak(s) (Yes/No): _____

Location of Leak(s): _____

Notifications to: _____

Written Report Required (Yes/No): _____

Condition of Alignment: _____

Repairs Required: _____

Encroachment(s) onto Alignment (Yes/No): _____

Type of Encroachment(s) onto Alignment: _____

Comments:

_____

_____

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_____

Reviewed By: _____
Action Taken: _____
Forwarded To: ☐ **File** ☐ **Supervisor** ☐ **P.W. Director**

CITY OF LATHROP
AIR/VACUUM RELEASE VALVE REPORT

ARV Number: _____

Date: _____

Operators: _____

Evidence of Overflows Contained in Manhole? (Yes/No) _____

Condition of Ball Valve: _____

ARV Exercised: ☐

Air Release Inspected: ☐

Vacuum Break Inspected: ☐

Items or Seals Replaced: _____

Comments:

_____

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_____

Reviewed By: _____

Action Taken: _____

Forwarded To: ☐ **File** ☐ **Supervisor** ☐ **P.W. Director**

TABLE C-1
WASTEWATER PUMP STATION PUMP AND MOTOR INFORMATION

Pump Station	Number of Pumps	Rated Power	Force Main Diameter (in)	Design Capacity (gpm)	Firm Capacity (gpm)(a)
MWQCF Collection System					
North Harlan PS	2	10 HP	6"	2,150	1,075
Stonebridge LS	2	10 HP	6"	700	350
Woodfield LS	3	5 HP	8" (b)	1,230	820
Valley Crossing LS (c)	2	3 HP	4"	83	83
J Street LS	2	10 HP	8"	1,400	700
Easy Court LS	2	3 HP	-	1,000	500
O Street PS	3	Two at 70 HP; one at 5 HP	12"	4,200	2,800
McKinley Avenue PS	3	Two at 25 HP; one at 5 HP	16"	2,513	1,675
Louise Avenue PS	2	5 HP	4"	(d)	(d)
Lathrop CTF Collection System					
Stanford Crossing	2	One at 90 HP; One at 45 HP	14" & 18"	4,100	2,300
Mossdale PS	4	30 HP	8" & 12"	5,400	4,050
River Islands Main PS	2 (e)	110 HP	12" & 18"	3,400	1,700
River Islands 2A PS	4	15 HP	30"	5,300	3,975
Lathrop Gateway PS	2	23 HP	4" & 6"	560	280
South Lathrop PS	3	12 HP	6" & 6"	2,775	1,850

Notes:

(a) Firm pumping capacity is defined as the total capacity of all pumps minus the capacity of the largest pump.

(b) This table shows Woodfield LS's capacity for its current connection to an 8" force main to the J Street LS area. The City has plans to reconnect it to a 10-inch diameter force main to McKinley Ave PS drainage area.

(c) Capacity of the 8"outlet is listed as the lift station capacity, as it is the capacity limiting component of this pump station.

(d) Pump station capacity depends on flows through the 16-inch force main to MWQCF and is not analyzed.

(e) River Islands Sewer PS will be constructed in phases with the addition of two pumps during each phase.

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APPENDIX D – Element 6 (Spill Emergency Response Plan) Supporting Documents

1. Spill Emergency Response Plan
2. Spill Emergency Response Plan SSO Reporting Chain of Communication
3. Spill Emergency Response Plan List of Contacts
4. Procedures for Estimating the Volume of Sewer Overflows
5. Sanitary Sewer Overflow Report Form

SPILL EMERGENCY RESPONSE PLAN

PURPOSE

This Spill Emergency Response Plan (SERP) is prepared to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The SERP includes measures to protect public health and the environment. The Enrollee (City) shall respond to spills from its systems in a timely manner that minimizes water quality impacts and nuisance by:

- Immediately stopping the spill and preventing/minimizing a discharge to waters of the State;
- Intercepting sewage flows to prevent/minimize spill volume discharged into waters of the State;
- Thoroughly recovering, cleaning up and disposing of sewage and wash down water; and
- Cleaning publicly accessible areas while preventing toxic discharges to waters of the State.

The City must comply with General Order Attachment E1-Notification, Monitoring, Reporting and Recordkeeping Requirements and Attachment E-2 – Summary of Notification, Monitoring and Reporting Requirements that are attached and associated with the development and implementation of this SERP.

The State Order establishes the following Spill Categories, as defined below:

1. **Category 1 Spill**

   A Category 1 spill is a spill of any volume of sewage from or caused by a sanitary sewer system regulated under this General Order that results in 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.
     Any spill volume not recovered from a drainage conveyance system is considered a discharge to surface water, unless the drainage conveyance system discharges to a dedicated stormwater infiltration basin or facility.

2. **Category 2 Spill**

   A Category 2 spill is a spill of 1,000 gallons or greater, from or caused by a sanitary sewer system regulated under the General Order that does not discharge to a surface water.

3. **Category 3 Spill**

   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 regulated under the General Order 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.

4. **Category 4 Spill**

A Category 4 spill is a spill of less than 50 gallons, from or caused by a sanitary sewer system regulated under the General Order 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.

PROCEDURES

I. Overflow Detection

City employees, contractors, or the public may detect an overflow. The Public Works Department (PWD) is primarily responsible for receiving phone calls from the public notifying the City of possible overflows from the wastewater conveyance system. The emergency response shall be available 24 hours per day, 365 days per year. During normal business hours, PW Admin generally receive either phone calls or "GoGov" online reports related to complaints and spills. After-hours calls will be directed to the On-Call Operator. For online reports, PW Admin will route the report to the O&M Superintendent and generate a work order through the "GoGov" system.

1) **First Step** – Record information from the reporting party regarding the incident. At a minimum, the following information should be recorded when taking the call:

   (a) Full name of caller (first/last name)

   (b) Caller's contact information (phone number, address, company name, etc.)

   (c) Date and time call received

   (d) Location of possible overflow (address and nearest cross street)

   (e) Description of the problem

   (f) Time problem was first observed by the caller

   (g) Observations of the caller

   (h) Other relevant information that will enable the PWD to quickly locate, assess, and stop the overflow (e.g. estimated spill volume, suspected cause of spill, are any hazardous chemicals involved)

2) **Second Step** – After completing the call, notify Public Works Utilities staff as soon as possible in the following order (move to the next person on the list if no answer to first caller):

   a) Utility Operations Superintendent

   b) Public Works Director

   c) Staff Completing Work Orders

   d) On-call Number

3) **Third Step** – After notification, create a work order for Operations staff through the "GoGov" system with the information collected above in Step 1.

4) **Fourth Step (if applies)** - After the initial call, we may have other callers reporting the spill. Please take their name & number and return their call once the problem has been resolved.

The SCADA system will automatically dial the on-call Utilities staff in the event of equipment failure or detection of a possible overflow. Sanitary sewer overflows detected by the SCADA system or any personnel in the course of their normal duties shall be immediately reported to their supervisor.

II. Initial Response

Failure of any element within the City-owned and operated wastewater conveyance system that threatens to cause or causes a SSO will trigger a response to isolate and correct the problem. Crews and equipment shall be available to respond to any sewer overflow locations.

Upon receipt of a report of sewage overflow, all response crew members shall proceed to the Corporate Yard where they will gather all necessary equipment and resources before proceeding to the site of the SSO. Delays or conflicts in assignments and issues regarding equipment and resources should be reported to their supervisor.

In the event of a spill or overflow, it is the responder's role to protect public health, the environment, and property from wastewater overflows and to restore the area to normal as soon as possible. Specifically, the responder should:

- Upon arrival at the site of the SSO, note the time of arrival, assess the situation, develop an approach to contain the sewage and eliminate the cause of the overflow.
- Visually assess the spill location(s) and spread using photography, global positioning system (GPS), and other best available tools. Document the critical spill locations, including:
    - Photography and GPS coordinates for:
        - The system location where the spill originated.
        - For multiple appearance points of a single spill event, the points closest to the spill origin.
    - Photography for:
        - Drainage conveyance system entry locations,
        - The location(s) of discharge into surface waters, as applicable,
        - Extent of spill spread, and
        - The location(s) of clean up.

- Responders shall promptly notify the Operations Superintendent, if available, of preliminary information and potential impacts. If the Operations Superintendent is not available, the Public Works Director should be notified.
- Immediately notify the Utilities Superintendent or the Public Works Director by telephone of all sanitary sewer overflows that could be greater than 1,000 gallons, that may have entered a body of water or that may have caused damage to private property.
- Establish safety parameter and control zones with cones, barricade, signs, vehicles, or terrain.
- If hazardous conditions that may cause illness or injury are encountered, immediately notify the Utilities Superintendent for guidance before taking further action.
    - The Utilities Superintendent shall alert the Lathrop Manteca Fire Department (LMFD) and request a hazardous materials response team.
    - Responders shall wait until the LMFD hazardous materials response team has determined it is safe for the sewer maintenance response team to proceed with containment, and cleanup activities.
- Contain or divert sewage, if possible, to prevent entry into a storm drain, body of water or environmentally sensitive areas. Use earthen berms, sandbags, air plugs in storm drains, vacuum unit or other available methods to contain or divert the flow. Determine if bypass pumping is feasible and, if so, have support staff divert flow around the blockage to the downstream manhole.
- Eliminate the cause of the overflow and restore the flow in the collection system. In most cases, this will be accomplished by removing a root, grease, or debris blockage in the sewer pipe using a hydrojet. Note the time that the flow is restored.
- If the blockage cannot be removed within 30 minutes of arrival, notify the Utilities Superintendent, or the Public Works Director immediately. Remain on site and follow directions.
- After the overflow has been stopped and repairs have been made, return any sewage that can be collected back to the sewer system using the Vacuum Truck or trash pump. Note the time this activity began.
- If the blockage is in a private lateral, notify the property owner of the blockage and inform them that the City does not own or maintain private service laterals. Suggest the property owner hire a plumber or contractor to clear their line.

III. Recovery and Clean-up (Mitigation)

Perform site clean-up by removing signs of all contamination such as toilet paper, solids, and grease with a rake or with a vacuum unit. Wash down the affected area with clean water, contain the water, and dispose of the water in the sewer. Remove the sewage from the drainage conveyance system. Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery. Implement pre-

planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during and after a spill event.

The potential for human health issues and adverse environmental impacts resulting from sanitary sewer overflows can be reduced by following these clean up and mitigation procedures. The procedures described are for dry weather conditions. During wet weather conditions modify these procedures as necessary when storm waters are high, and flushing is impractical. Cleanup flushing should be accomplished only with clean water.

Paved Areas

Collect all signs of contamination by hand or with the use of rakes or brooms as appropriate and dispose of as solid waste. Pressure-wash the affected area with clean water until the wash water is clear. Contain and vacuum the wash water – do not allow wash water to enter the drainage conveyance system. Allow the affected area to dry and repeat the process if necessary. For paved areas on private property, use a disinfectant solution for the final flush.

Areas with Bare Soil or Vegetation

Collect all signs of contamination by hand or with the use of rakes as appropriate and dispose of it as solid waste. Flush the affected area with clean water until the wash water is clear. The volume of the flushing water should be approximately three times the amount of sanitary sewage volume that contaminated the area. Contain and vacuum up the wash water. Allow the affected area to dry and repeat the process if necessary.

Drainage Conveyance System

If a spill reaches a drainage conveyance system, attempt to isolate and contain the spill by moving downstream and temporarily plugging the drain. Spills to the drainage conveyance system are considered a threat to waters of the State. Once isolated, flush the affected area with clean water until the wash water is clear. The volume of the flushing water should be approximately three times the amount of sanitary sewage volume that contaminated the area. Contain and vacuum up the wash water. Remove temporary plugs and dispose of spilled material and wash water into the sewer.

A drainage conveyance system is a publicly- or privately-owned separate storm sewer system, including but not limited to drainage canals, channels, pipelines, pump stations, detention basins, infiltration basins/facilities, or other facilities constructed to transport stormwater and non-stormwater flows.

Waters of the State

If a spill reaches or threatens to reach waters of the State (including groundwater), obtain guidance from the governing State and Federal agencies on clean up procedures in order to prevent further damage, including State and Regional Water Boards, the California Department of Fish and Wildlife or the United States Fish and Wildlife Service. Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters.

Waters of the State include, but are not limited to, groundwater aquifers, surface waters, saline waters, natural washes and pools, wetlands, sloughs, and estuaries, regardless of

flow or whether water exists during dry conditions. Waters of the State include waters of the United States.

Obtain guidance from the governing state and federal agencies if an environmentally sensitive area is impacted. Divert and contain sewage quickly to minimize impact to these areas. Any water used to clean up these areas should be de-chlorinated prior to use to minimize impacts to aquatic life.

IV. Public Access and Warning

Set up barricades and post warning signs in cases where public health may be at risk by contact with sewage or sewage contamination. Warning signs should contain the words "Raw Sewage, Avoid Contact". Place the barricades and signs at points of public access in an effort to warn the public in that immediate area. Signs should also include contact information for the City.

Inspect all sewer overflow locations the following day. Identify any signs of contamination. Verify whether barricades and warning signs are still needed and whether the signs are still in place, especially at points of public access.

Check barricade signs daily until approval to remove signs is received from the San Joaquin County Department of Environmental Health.

V. Water Quality Sampling and Analysis

For sewage spills in which an estimated 50,000 gallons or greater are discharged into a surface water, the City shall conduct the following water quality sampling no later than **18 hours** after the City's knowledge of a potential discharge to a surface water in accordance with **Attachment E-1, Section 2.3.2 Receiving Water – Water Quality Sampling and Analysis.**

Testing by San Joaquin Environmental Health Department

The City should inform the San Joaquin County Environmental Health Department (SJCEHD) of any sewage contamination in a body of water that may pose a threat to human health. This provides the SJCEHD the opportunity to perform water sampling and testing and make the final determination that the water body is no longer contaminated.

VI. Investigation and Documentation

Investigate and document all SSOs. This information is useful in determining modifications to the operations and maintenance program, capital program decision making, and to respond to regulatory inquiries. Conduct post-spill assessments of spill response activities. Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.

It is the responsibility of the appropriate PWD personnel or the response crew to gather all spill response data and communicate this data back to the Utilities Superintendent as soon as possible. Information obtained on the SSO shall be reported on a **Sanitary Sewer Overflow Report Form** as appropriate for each type of Spill Category (included in this appendix) and kept in a file created for each SSO event.

Perform a preliminary estimate of the sewer overflow volume using the methods outlined in page D-20: Procedures for Estimating the Volume of Sewer Overflows.

Fill out the attached Sanitary Sewer Overflow Report, note time and obtain GPS coordinates and photographs (as required by the General Order) prior to leaving the site.

Submit the Sanitary Sewer Overflow Report. For major SSOs (i.e. SSO Categories 1 and 2), submit the form with immediately available information to the Utilities Superintendent or the Public Works Director as soon as possible. For minor SSOs (i.e. SSO Categories 3 and 4), submit the Internal Overflow Report to the Utilities Superintendent or the Public Works Director by 4:00 P.M. for overflows occurring during business hours or by 9:00 A.M. for overflows occurring outside of regular business hours (i.e. 8:00AM - 6:00PM Monday – Thursday; 8:00AM - 5:00 PM Friday).

Sewer Overflow Investigation

The goal of a sewer overflow investigation is to determine the cause of the sewer overflow and to identify appropriate corrective actions to minimize the recurrence of that type of event. The investigation should follow immediately after the spill response is complete. Table D-1 provides a checklist of activities that should be performed following a sewer overflow.

TABLE D-1
CITY OF LATHROP
SEWER OVERFLOW INVESTIGATION ACTIVITIES CHECKLIST

SSO Investigation Activities	Checklist
Interview field personnel that responded to the sewer overflow	☐
Review maintenance history of pipes and manholes where the blockage or failure occurred	☐
Inspect the manhole or sewer pipe where the blockage or failure occurred using closed circuit television (CCTV)	☐
Inspect the sewer overflow site and the affected area	☐
Review description, photographs and GPS coordinates of the system location where the spill originated.	☐
Review available flow data and SCADA data (if appropriate)	☐
Review sewer overflow volume estimate	☐
Review water quality results	☐
Evaluate corrective actions	☐
Record results of investigation on Sewer Overflow Report	☐

Sewer Overflow Tracking

Sewer overflows should be tracked on a map marking the location of all known sewer overflows. The map should identify the specific pipe or manhole that contained the blockage or failure. The sewer overflow event should also be documented in the maintenance management system.

Sewer Spill Documentation

Each sewer overflow, regardless of volume, should be documented in a unique file. The file should contain pertinent information that may be necessary to respond to future regulatory audits or actions. A checklist of the information that should be included in the sewer overflow documentation file is provided in Table D-2. Use the following guidelines to document the spill:

1. Provide accurate flow measurements and duration of the spill. Refer to the end of this Spill Emergency Response Plan for methods of sewer overflow volume estimates.
2. Provide a map of the problem location (manhole/s involved) and where the spill discharged (storm drain, field, stream, City of Lathrop, Sewer System Facilities Map).

TABLE D-2
SANITARY SEWER OVERFLOW
DOCUMENTATION ACTIVITIES CHECKLIST

Documentation Item	In File
Service Call Data:	☐
Date and time received	☐
Caller name	☐
Caller address	☐
Caller telephone number	☐
Location of Sewer overflow	☐
Description of the problem	☐
Sewer Overflow Report	☐
Map showing location of the overflow and the location of the cause	☐
Notes regarding directions provided by the regulators	☐
GPS Coordinates and Photographs:	☐
Overflow site upon arrival	☐
Actions taken during response (including people, equipment, activities)	☐
Upon completion of clean up and mitigation	☐
CCTV videotape and inspection pictures showing defects	☐
Record of completion of corrective action	☐

VII. Regulatory Notification, Monitoring, Recordkeeping and Reporting

REFER TO THE STATE WATER RESOURCES CONTROL BOARD ORDER NO. WQ 2022-0103-DWQ (GENERAL ORDER) ATTACHMENT E1 – NOTIFICATION, MONITORING, REPORTING AND RECORDKEEPING REQUIREMENTS AND ATTACHMENT E2 – SUMMARY TABLES FOR NOTIFICATION, MONITORING AND REPORTING REQUIREMENTS

Notification of Spills of 1,000 Gallons or Greater to the California Office of Emergency Services

Per Water Code section 13271, for a spill that discharges in or on any waters of the State, or discharges or is deposited where it is, or probably will be, discharged in or on any waters of the State, the Enrollee shall notify the California Office of Emergency Services and obtain a California Office of Emergency Services Control Number as soon as possible **but no later than two (2) hours** after:

- The Enrollee has knowledge of the spill; and
- Notification can be provided without substantially impeding cleanup or other emergency measures.

The notification requirements in this section apply to individual spills of 1,000 gallons or greater discharging or threatening to discharge from an Enrollee-owned and/or operated laterals, to a water of the State. Discharges to the storm drain conveyance system are considered a threatened discharge to waters of the State.

Spill Notification Information

The Enrollee shall provide the following spill information to the California Office of Emergency Services (800) 852-7550 before receiving a Control Number, as applicable:

- Name and phone number of the person notifying the California Office of Emergency Services;
- Estimated spill volume (gallons);
- Estimated spill rate from the system (gallons per minute);
- Estimated discharge rate (gallons per minute) directly into waters of the State or indirectly into a drainage conveyance system;
- Spill incident description:
  - Brief narrative of the spill event, and
  - Spill incident location (address, city, and zip code) and closest cross streets and/or landmarks;
- Name and phone number of contact person on-scene;
- Date and time the Enrollee was informed of the spill event;
- Name of sanitary sewer system causing the spill;
- Spill cause or suspected cause (if known);

- Amount of spill contained;
- Name of receiving water body receiving or potentially receiving discharge; and
- Description of water body impact and/ or potential impact to beneficial uses.

Notification of Spill Report Updates

Following the initial notification to the California Office of Emergency Services and until such time that the Enrollee certifies the spill report in the online CIWQS Sanitary Sewer System Database, the Enrollee shall provide updates to the California Office of Emergency Services regarding substantial changes to:

- Estimated spill volume (increase or decrease in gallons initially estimated);
- Estimated discharge volume discharged directly into waters of the State or indirectly into a drainage conveyance system (increase or decrease in gallons initially estimated); and
- Additional impact(s) to the receiving water(s) and beneficial uses.

Notification of SSOs to Other Regulatory Agencies:

Other regulatory agencies should be notified depending on the location and/or impacts of the SSO:

For impacts to recreational swimming areas or similar threats to public health:

Notify the San Joaquin County Environmental Health Department (SJCEHD): (209) 468-3420.

In case of impacts to the City's Drinking Water System or water supplies:

Notify the California State Water Resources Control Board, Division of Drinking Water, District 10 - Stockton: (209) 948-7696

In case of a fish kill:

Immediately notify the California Department of Fish and Wildlife at (916) 227-2245 and provide updates as needed.

Spill into South San Joaquin Irrigation District (SSJID) Canal:

Contact SSJID at (209) 823-3101.

Other local agencies and individuals that should be notified depending on the circumstances of the SSO:

City of Manteca:

The City of Manteca should be notified if a sewer overflow from the City's collection system occurs in Manteca's service area. Call during working hours: (209) 456-8470

Internal Managers:

- For all SSOs, Notify the Public Works Utilities Superintendent;

- Major spills (greater than 1,000 gallons), or those affecting surface water or human health (SSO Categories 1 and 2), additionally notify the Public Works Director;
- For Major spills (greater than 50,000 gallons), or those affecting surface water or human health, additionally notify the City Manager.

Police Department: Roadblock, traffic control, etc.

Public Services: Close areas such as parks, shopping centers, etc.

Water Department: Impact on drinking water storage or supply.

In addition, any local residents and businesses that may be impacted.

VIII. Equipment

This section provides a list of City-specialized equipment required to support this OERP.

VacCon Truck

A VacCon truck is required to clear blockages in gravity sewers and to vacuum up spilled sewage. The truck can also be used for wash down and cleanup.

Portable Pumps and Hoses

Portable pumps ranging in size from 2" to 6" are required to pump spilled sewage and/or contaminated water back into the sewer system.

Street Sweeper

A street sweeper may be used to assist in the cleanup of roadways and parking lots.

Closed Circuit Television (CCTV) Inspection Unit (or Lateral Inspection Unit)

A portable CCTV Inspection Unit is required to determine the root cause of all SSOs from gravity sewers. CCTV inspection services can be provided by a contractor.

Emergency Response Truck(s)/Trailer

A utility body truck and/or trailer is required to store and transport the equipment needed to effectively respond to sewer emergencies. The equipment and tools should include an electric eel rodding machine, sectional rods, generator, lights, and spill containment and cleanup materials.

Photographic Equipment

A digital, instant, or disposable camera is required to record the conditions upon arrival, during cleanup, and upon departure.

GPS Unit

A hand-held GPS unit (Global Positioning System) is required to determine the coordinates of spills for use in meeting RWQCB SSO reporting requirements. City issued cellular phones are equipped with the ability to geolocate all photographs.

IX. Training

This section provides information on the training that is required to support this SERP.

Initial and Annual Refresher Training

All Utility Operators should be trained in sewage overflow response, which includes this plan. The training program should be updated annually.

All employees who may have a role in responding to, reporting, and/or mitigating a sewer system overflow should receive training. All new employees should receive training before they are placed in a position where they may have to respond. Current employees should receive annual refresher training on this plan and the procedures to be followed.

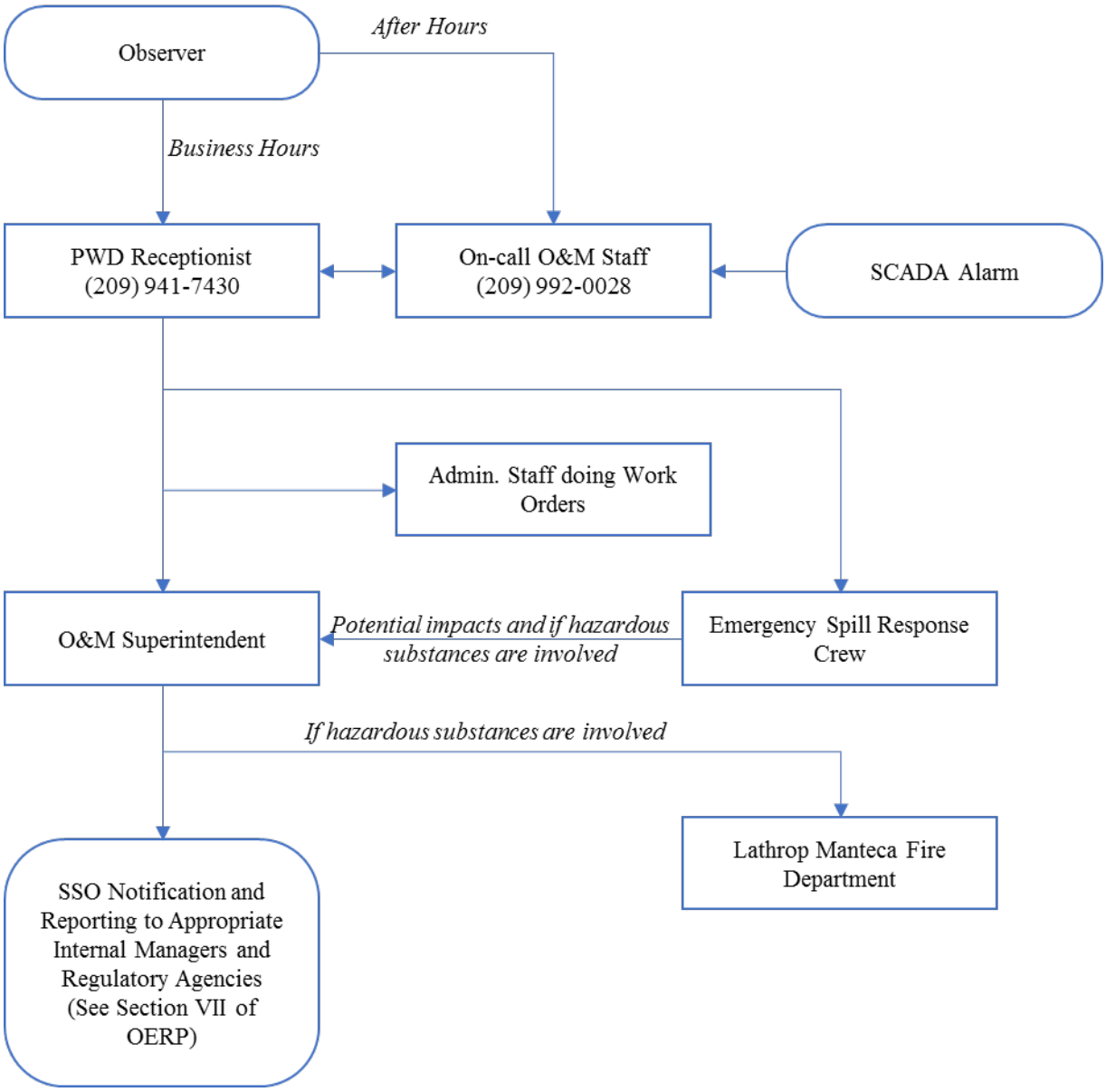
SSO Response Exercises

Periodic training exercises will be held to ensure that employees are up to date on the procedures, to verify the equipment is in working order, and the required materials are readily available. The training exercises should cover scenarios typically observed during sewer-related emergencies (e.g. mainline blockage, mainline failure, force main failure, pump station failure, and lateral blockage). The results and the observations during the exercises should be recorded and action items should be tracked to ensure completion.

Record Keeping

Records shall be kept of all training that is provided in support of this plan. The records for all scheduled training courses and for each spill emergency response training event should include date, time, place, content, name of trainer(s), and names of attendees.

CITY OF LATHROP
SPILL EMERGENCY RESPONSE PLAN
SSO REPORTING CHAIN OF COMMUNICATION



CITY OF LATHROP
SPILL EMERGENCY RESPONSE PLAN
LIST OF CONTACTS

Contact	Phone Number	Email Address
Public Works After Hours Emergency	(209) 992-0028	
Michael King, Assistant City Manager (Acting Public Works Director)		
Frank Vallejo, Utilities Superintendent		
Brad Taylor, City Engineer		
Chris Hart, Utility Plant Supervisor		
Henry Hernandez, Utility Operator		
Phil Humphrey, Utility Operator		
Mauricio Zavaleta, Utility Operator		
Jesse Estrada, Utility Operator		
Jeremy Montoya, Utility Operator		
Damon Kalahele, Utility Operator		
Moses Vasquez, Utility Operator		
Greg Gibson, Senior Civil Engineer		
Jonah Sonner, Compliance Engineer		
Bonnie Evans, Admin Assistant II		
Maria Lamas, Admin Assistant II		

Contact	Phone Number	Email Address
Grace Manganaan, Admin Assistant II		
Stephanie Rosillo-Silva, Admin Assistant I		
Teresa Vargas, City Clerk		
Stephen Salvatore, City Manager		
Lathrop Fire Department - J Street Station	(209) 941-5100	
Lathrop Police Department	(209) 468-4400	
Paul Zolfarelli, Project Manager, VWNA (Lathrop CTF)		

PROCEDURES FOR ESTIMATING VOLUME OF SEWER OVERFLOWS

A variety of approaches exist for estimating the volume of a sanitary sewer overflow. This appendix documents five approaches that can be used. The individual preparing the estimate should select the approach most appropriate to the sewer overflow in question using the best information available. Every effort should be made to make the best possible estimate of the volume. Assistance from the engineering group within the PWD should be sought for larger sewer overflows.

Upstream Connections

If the flow is coming from a cleanout or a broken line, count the number of upstream connections and estimate the time that the flow has been occurring. Remember that the flow was probably flowing before noticed and reported. Each residence contributes about 245 gallons per day per connection or about 10 gallons per hour. Multiply the number of residences by 245 or 10 and by the number of days or hours, respectively. This provides the number of gallons.

Visual Estimate

If the flow is coming from a manhole, use the photographs in this appendix to estimate the flow. Select which photograph in gallons per minute is similar to the overflow you are experiencing and multiply it by 60, then multiply this by the estimated number of hours the overflow has been occurring. This will estimate the amount of overflow in gallons.

Pump Station Estimate

If the flow is coming from a pump station, use the previous days (same weather) flow and pump capacity to estimate the flow.

Eyeball Estimate

The volume of very small spills can be estimated using an eyeball estimate. To use this method, imagine the amount of water that would spill from a bucket or a barrel. A bucket contains 5 gallons and a barrel contains 50 gallons. If the spill is larger than 50 gallons, try to break the standing water into barrels and then multiply by 50 gallons. This method is useful for contained spills up to 100 gallons.

Measured Volume

The volume of most spills can be estimated using this method. The shape, dimension and depth of the spilled wastewater are needed. The shape and dimension are used to calculate the area of the spill and the depth is used to calculate the volume.

1. Sketch the shape of the contained sewage.
2. Measure or pace off the dimensions.
3. Measure the depth at several locations.
4. Convert the dimensions, including depth, to feet.
5. Calculate the area using the following formulas:

   Rectangle Area = length x width

   Circle Area = $(\text{diameter}/2)^2 \times 3.14$

Triangle Area = ½ x base x height

6. Multiply the area times the depth.
7. Multiply the volume by 7.5 to convert to gallons.

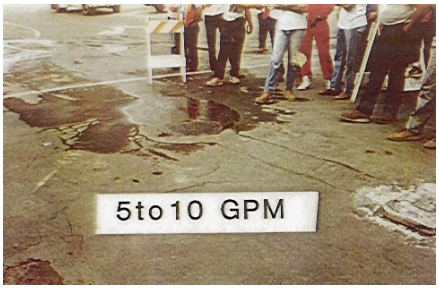
Duration and Flow Rate

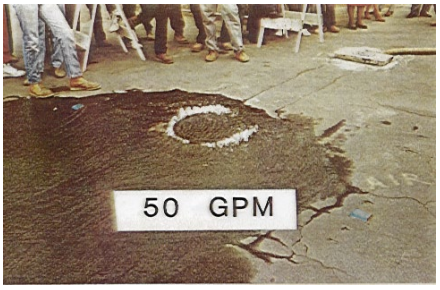
Calculating the volume of spills where it is difficult or impossible to measure the area and depth requires a different approach. In this method, separate estimates are made of duration of the spill and the flow rate. The methods of estimating duration and flow rates are:

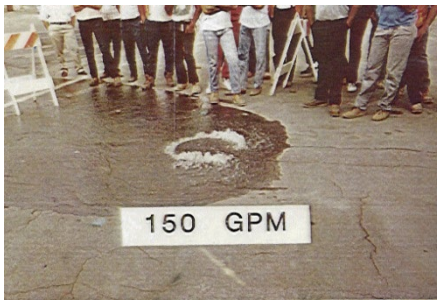
1. Duration: The duration is the elapsed time from the start of the spill to the time the spill stopped.
2. Start Time: This is sometimes difficult to establish. Three methods to establish start time are as follows:
   a. Local residents can be used to establish start time. Inquire as to their observations. Spills that occur in rights-of-ways are usually observed and reported in short order. Spills that occur out of public view can go on longer. Sometimes, observations like odors or sounds (e.g. water running in a normally dry creek bed) can be used to estimate the start time.
   b. Changes in flow on a downstream flow meter can be used to establish the start time. Typically, the daily flow peaks are cut off or flattened by the loss of flow. This can be identified by comparing hourly flow data, when available.
   c. Conditions at the spill site change with time. Initially, there will be limited deposits of grease and toilet paper. After a few days to a week, the grease forms a light colored residue. After a few weeks to a month, the grease turns dark. In both cases, the quantity toilet paper and other materials of sewage origin increase in amount. These changes with time can be used to estimate the start time in the absence of other information.
3. End Time: This is much easier to establish. Field crews on-site observe the blow down that occurs when the blockage has been removed. The blow down can be observed in downstream flow meters.
4. Flow Rate: The flow rate is the average flow that left the sewer system during the time of the spill. There are three ways to estimate the flow rate:
   a. Manhole flow rate chart: This chart shows the sewage flowing from a manhole cover for a variety of flow rates. The observations of the field crew are used to select the approximate flow rate from the chart.
   b. Flow meter: Changes in flows in the downstream flow meters can be used to estimate the flow rate during the spill.
   c. Once the location is known, the number of upstream connections can be determined from the field books. Multiply the number of residences by 245 gallons per day per connection or 10 gallons per hour per connection.

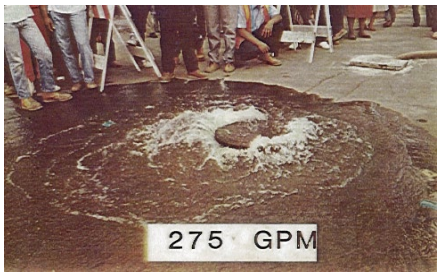
   Once duration and flow rate have been estimated, the volume of the spill is calculated by multiplying the duration in hours or days times the flow rate in gallons per hour or gallons per day.

ESTIMATING WASTEWATER FLOWS









Sanitary Sewer Overflow Report Form

1. Was the sewage spill from or caused by a sanitary sewer system regulated under the Sanitary Sewer Systems General Order per your Enrollee WDID number (including an Enrollee owned and/or operated lateral(s))? **Yes / No**
2. Did the spill result in a discharge to a surface water, including a surface water body that contains no flow or volume of water? *(This includes spills from Enrollee owned and/or operated laterals)* **Yes / No**
3. Did the spill result in a discharge to a drainage conveyance system that discharges to surface waters? **Yes / No**
4. Was the spill caused by a failure in the enrollee owned or operated lateral? **Yes / No**
5. What is the spill volume caused by a failure or blockage in the main sanitary sewer system?
    a. ____ Gallons.

[completing these questions locks the user into the reporting form category]

Sanitary Sewer Overflow Report Form

1. Name of Enrollee contact person to respond to spill-specific questions:
    a. Telephone number of Enrollee contact person to respond to spill-specific questions:
2. Spill Location Name:
3. Date and time the Enrollee was notified of, or self-discovered, the spill:
4. Operator arrival time:
5. Estimated spill start date and time:
6. Description, photographs, and GPS coordinates of the system location where the spill originated: If a single spill event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the spill appearance point explanation field:
   Submit photographs under the Attachments tab

   6.a Latitude: [Show map pop-up, pin the spill location]

   6.b Longitude:

   6.c Appearance Points: *see table*

   6.d Other (Describe)

   6.e Additional spill appearance point(s) explanation:
7. Estimated total spill volume exiting the system (in gal):
8. Description and photographs of the extent of the spill and spill boundaries:

   Submit photographs under the Attachments tab
9. Did the spill reach a drainage conveyance system? **Yes / No** [if YES, complete 9.a thru 9.c)
    a. Description of the drainage conveyance system transporting the spill and photographs of the drainage conveyance system entry location(s):
    b. Estimated spill volume fully recovered from the drainage conveyance system:
    c. Estimated spill volume discharge to a groundwater infiltration basins or facility:
10. Estimated total spill volume recovered (in gal):
11. Spill Destination(s): *[see table]*
    a. If other, describe:
    b. Description of the spill event destination(s), including GPS coordinates if available, that represent the full spread and reach of the spill:
12. Spill end date and time:

13. Description of how the spill volume estimations were calculated, including at a minimum:

    The methodology, assumptions and type of data relied upon, such as supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information, used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered):

    a. Description of the methodology(ies), assumptions and type of data relied upon for estimations of the spill start time and the spill end time:

14. Spill cause(s):

    a. If other, describe:

15. System failure location:

    a. If other, describe:

16. Description of the pipe material, at the failure location:

    a. If other, describe:

    b. Estimated age of pipe material, at the failure location:

17. Description of the impact of the spill:

18. Was the spill associated with a storm event? **Yes / No**

19. Spill response activities:

    a. If other, describe:

    b. Description of spill response activities including description of immediate spill containment and cleanup efforts:

20. Spill corrective action:

    a. If other, describe:

    b. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the spill, and a schedule of major milestones for those steps:

    c. Local regulatory enforcement action taken against an illicit discharge in response to this spill, as applicable:

    d. Identifiable system modifications, and operation and maintenance program modifications needed to prevent repeated spill occurrences at the same spill event location, including:

        i. Adjusted schedule/method of preventive maintenance:

        ii. Planned rehabilitation or replacement of sanitary sewer asset:

iii. Inspected, repaired asset(s), or replaced defective asset(s):

iv. Capital improvements:

v. Documentation verifying immediately implemented system modifications and operating/maintenance modifications:

vi. Description of spill response activities modifications:

vii. Spill response completion date:

viii. Ongoing investigation efforts:

ix. Expected completion date of investigation to determine the full cause of spill:

21. Detailed narrative of investigation and investigation findings of cause of spill"

Sanitary Sewer Overflow Report Form

List for Question 6C:

- Backflow Prevention Device
- Combined Sewer Drain Inlet. (Combined Collection System Only)
- Force Main
- Gravity Mainline
- Inside Building or Structure
- Lateral Clean Out (Private)
- Lateral Clean Out (Public)
- Lower Lateral (Private)
- Lower Lateral (Public)
- Manhole
- Other (specify below)
- Other Sewer System Structure
- Pump Station
- Upper Lateral (Private)
- Upper Lateral (Public)

List for Question 11:

- Building or Structure
- Drainage Conveyance System
- Drainage Conveyance System that discharges to surface water
- Groundwater Infiltration Basin or Facility
- Other (specify below)
- Paved Surface
- Street/Curb and Gutter (2 3)
- Surface Water
- Unpaved Surface

List for Question14:

- Air Relief Valve (ARV) / Blow-Off Valve (BOV) Failure
- Collection System Maintenance Failure (specify below)
- Construction Diversion Failure
- Damage by Other Not Related to Collection System Construction/Maintenance
- Debris from Construction
- Debris from Lateral
- Debris-General
- Debris-Rags
- Debris-wipes/Non-disposables
- Fats, Oil and Grease (FOG)
- Flow Exceeded Capacity (Separate Collection System Only)
- Inappropriate Discharge to Collection System
- Natural Disaster (specify below)

Sanitary Sewer Overflow Report Form

List for Question14 (Continued):

- Operator Error (specify below)
- Other (specify below)
- Pipe Structural Problem/Failure – Controls
- Pipe Structural Problem/Failure – Installation
- Pump Station Failure – Controls
- Pump Station Failure – Mechanical
- Pump Station Failure – Power
- Rainfall Exceeded Design, I and I (Separate Collection System Only)
- Root Intrusion
- Siphon Failure
- Surcharged Pipe (Combined Collection System Only)
- Vandalism (specify below)

List for Question15:

- Air Relief Valve (ARV) / Blow-Off Valve (BOV) Failure
- Force Main
- Gravity Mainline
- Lower Lateral
- Manhole
- Other (specify below)
- Pump Station Failure – Controls
- Pump Station Failure – Mechanical
- Pump Station Failure – Power
- Siphon
- Upper Lateral

List for Question16:

- Acrylonitr. Butadiene Styrene (ABS)
- Cast Iron
- Concrete
- Copper
- Cross-Linked Polyethylene (PEX)
- Ductile Iron
- Fiberglass
- Galvanized Steel
- Other (specify below)
- Polyvinyl Chloride (PVC)
- Vitrified Clay

Sanitary Sewer Overflow Report Form

List for Question19:

- Cleaned Up (specify below)
- Contained All or Portion of Spill
- Mitigated Effects of Spill (specify below)
- Other (specify below)
- Other Enforcement Agency Notified
- Property Owner Notified
- Restored Flow
- Returned All Spill to Sanitary Sewer System
- Returned Portion of Spill to Sanitary Sewer System

List for Question 20:

- Added Sewer to Preventive Maintenance Program
- Adjusted Schedule/Method of Preventive Maintenance
- Enforcement action against Fats, Oil and Grease (FOG) source
- Inspected Sewer Using CCTV to Determine Cause
- Other (specify below)
- Plan Rehabilitation or Replacement of Sewer
- Post Spill CCTV
- Repaired Facilities or Replaced Defect

APPENDIX E – Element 7 (Sewer Pipe Blockage Control Program) Supporting Documents

1. Table E-1. List of Food Facilities in Lathrop
2. City of Lathrop - Industrial Pretreatment Program, Implementation Procedures
3. "Preventing Sewer Backups" public outreach brochure.

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Table E-1. List of food facilities in Lathrop

Business Name	Street Address
Burger King	15119 S. Harlan Road
Carl's Jr.	200 E. Louise Ave.
Chevron / Lathrop Gas & Food	140 Lathrop Road
Chicago Pizza	159 Lathrop
Chipotle Mexican Grill	16542 Golden Valley Parkway
China Wok	15020 Harlan Road
Lathrop Shopping Center (Deli Delicious)	16608 S. Harlan Road
Denny's	16851 Harlan Road
BBQ Nation	15338 S. Harlan Road
Subway	15328 S. Harlan Road
T4 Lathrop	15346 S. Harlan Road
Little Caeser's Pizza	15344 Harlan Road
Domino's Pizza	16605 S. Harlan Road
Dona Tere Pervian Restaurant	16438 Cambridge Drive
La Costa De Acapulco	16444 Camrbidge Drive
Dutch Bros Coffee	15135 Old Harlan Road
Eagles Nest Harley Davidson	13900 Harlan Road
Fairfield In & Suites	17401 S. Manthey Road
Flying J Travel Plaza (Cinnabon, PJ Fresh)	345 Roth Road
Holiday Inn Express Suites	15688 S. Harlan Road
In & Out Burger	16514 Golden Valley Parkway
Jack in the Box	100 E. Louise
Joe's Travel Plaza / TOGOS	15600 Harlan Road
Ron's Truck Wash	15600 Harlan Road
KFC/A&W	150 E. Louise
La Hacienda Taquiria	15158 Harlan Road
Lathrop Food Plaza	16201 S Harlan Road
Louise Avenue Plaza Interceptor	199 E. Louise Ave
Amici Sushi	269 E. Louise Ave
Golden Bowl	249 E. Louise Ave
Star India Sweets & Catering	209 E. Louise Ave
Vallarta Mexican Food	245 Louise Ave.
McDonalds	300 E. Louise Ave.
Mikasa Japanese Bistro	15138 Harlan Road
Milan's (Sicily) Pizza	15030 Harlan Road
Mountain Mike's Pizza	229 Louise Ave.
Panda Expess	15099 Old Harlan Road
Popeye's Chicken	16837 S. Harlan Road
Rasoi	15106 S. Harlan Road
River Island Boat House	980 Lakeside Drive
Savemart	15240 Harlan Road
Sonic	15107 Old Harlan Road

Business Name	Street Address
Sprouts	16576 Golden Valley Pkwy
Starbucks	15010 S. Harlan Road
Starbucks	16538 Golden Valley Parkway
Storage Pro Carwash	15550 Harlan Road
Taco Bell	16905 Harlan Road
Taco House Mexican Grill	16925 S. Harlan Road
Target (Pizza Hut Express and Starbucks)	16858 Golden Valley Parkway
The Blessed Kitchen	151 E. Lathrop Road
TRU by Hilton	161 E. Louise Ave
De Colores	14725 S Harlan Road
Roundtable Pizza	15124 S. Harlan Road

City of Lathrop

Enforcement Response Plan
from
INDUSTRIAL PRETREATMENT PROGRAM

Prepared for:

Public Works Department
Utility Operations Division
390 Towne Centre Drive
Lathrop, CA 95330
(209) 941-7430

Prepared by:

ROBERTSON - BRYAN, INC.
Solutions for Progress

3100 Zinfandel Drive, Suite 300
Rancho Cordova, CA 95670
(916) 714-1801

November 2024

8 Enforcement Response Plan

In accordance with the General Pretreatment Regulations, 40 CFR 403.8(f)(5), this chapter:

- Describes how the City will respond to Industrial User noncompliance;
- Describes the types of escalated enforcement actions that the City will take in response to all anticipated types of Industrial User violations;
- Identifies personnel responsible for each type of response; and
- Identifies the time periods within which to initiate and follow-up on enforcement actions.

8.1 Enforcement Response Considerations

The scale and severity of a violation or noncompliance is an important consideration when taking an enforcement action. The City will take into consideration (1) the magnitude of the violation; (2) duration of the violation; (3) effect of the violation on the receiving water; (4) effect of the violation on the CTF; (5) compliance history of the Industrial User; and (6) good faith of the Industrial User when implementing an enforcement response. Each of these considerations is explained further below.

8.1.1 Magnitude of Violation

An isolated instance of noncompliance can be met with an informal response and notice letter for violation. The City will respond to any Significant Noncompliance with an enforcement order that requires a return to compliance by a specified deadline. Lathrop Municipal Code Section 13.26.090(A) defines Significant Noncompliance as any of the following.

1. Chronic violations of wastewater discharge limits, defined as those in which sixty-six percent (66%) or more of wastewater measurements taken during a six-month period exceed the daily maximum limit or the average limit for the same pollutant parameter by any amount.

2. Technical review criteria (TRC) violations, in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six-month period equals or exceeds the product of the daily maximum limit or the average limit multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH).

3. Any other discharge violation that the City believes has caused, alone or in combination with other discharges, Interference or Pass Through, including endangering the health of CTF personnel or the general public.

4. Any discharge of pollutants that has caused imminent endangerment to the public or to the environment, or has resulted in the City's exercise of its emergency authority to halt or prevent such a discharge.

5. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance.

6. Failure to provide within thirty (30) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with Categorical Pretreatment Standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules.

7. Failure to accurately report noncompliance.

8. Any other violation(s) which the City determines will adversely affect the operation or implementation of the Industrial Pretreatment Program.

8.1.2 Duration of Violation

Violations (regardless of severity) that continue over prolonged periods of time will subject the Industrial User to escalated enforcement actions. For example, exceedances of a permit limit that occurs in two out of three samples over a six-month period or a report that is more than thirty (30) days overdue may be considered significant violations. The City will issue enforcement orders for chronic violations. If the Industrial User fails to comply with the enforcement order, then the City may assess administrative penalties or initiate judicial action. For prolonged violations that result in serious harm to the POTW, the City may consider terminating service or obtaining a court order to halt further violations as well as to recover the costs of repairing the damage.

8.1.3 Effect of Violation on the CTF and Receiving Water

One of the primary objectives of the National Pretreatment Program is to prevent Pass Through or Interference. Consequently, any violation which results in harm to the CTF or environmental harm will be met with a severe response. Harm will be presumed whenever an Industrial User discharges a pollutant into the sewerage system which:

- Causes Upset or Interference with CTF treatment processes;
- Causes harm to CTF personnel;
- Causes a violation of the CTF NPDES permit limits related to achieving receiving water quality standards;
- Causes sludge contamination; or
- Has a toxic effect on the receiving water (e.g., fish kill).

At a minimum, responses to these circumstances will include an enforcement order and an administrative fine. In addition, the City may seek recovery of any NPDES permit-related fines and penalties paid by the City, and recovery of costs to repair the CTF.

8.1.4 Compliance History

A pattern of recurring violation indicates either that the Industrial User's pretreatment system is inadequate or that the Industrial User has taken a casual approach to operating and maintaining its treatment system. Compliance history is an important factor for deciding which appropriate remedies apply to a particular violation.

8.1.5 Good Faith

An Industrial User's good faith efforts to comply with pretreatment requirements and enforcement actions will be a factor in determining which enforcement response to invoke. If an Industrial User demonstrates willingness to comply, the City may select less stringent enforcement responses. However, good faith may not eliminate the necessity of an enforcement action.

8.2 Types of Enforcement Response

Types of enforcement response are addressed below. These enforcement response types are set forth in Lathrop Municipal Code Section 13.26.110, *Administrative Enforcement Remedies*. Templates for various enforcement responses are provided in **Appendix L**.

8.2.1 Informal Notification

Informal notification may consist of a telephone call, e-mail, or meeting. Informal notification may be used to correct minor inadvertent noncompliance, suggest the exercise of more due care, or notify the Industrial User that subsequent noncompliance of the same type may result in a Notice of Violation. The informal notification will specify the type of follow-up actions required and the timeframe for responding.

8.2.2 Notice of Violation

A Notice of Violation is issued when the City finds that an Industrial User has violated, or continues to violate, any provision of Lathrop Municipal Code Chapter 13.26, a Wastewater Discharge Permit, or any other Pretreatment Standard or requirement. The City may require the Industrial User to provide a written explanation of the violation and a plan for the satisfactory correction and prevention thereof. The City may also require the Industrial User to increase monitoring for a regulated parameter, or conduct special monitoring and an investigation to determine the cause of continued noncompliance.

8.2.3 Enforcement Orders

Enforcement orders are documents that direct Industrial Users to undertake or to cease specific activities. Enforcement orders are generally used as the first formal response to Significant Noncompliance and incorporate compliance schedules, administrative penalties, and termination of service orders.

8.2.3.1 Consent Order

Consent Orders are assurances of voluntary compliance and include the specific action(s) to be taken by the Industrial User to correct the noncompliance within a specified period.

8.2.3.2 Show Cause Hearing

A Show Cause Hearing is a meeting to show cause why a proposed enforcement action should not be taken against the Industrial User. This is an official meeting and should be attended by the City Attorney, Public Works Director, and City Manager. This meeting is usually held prior to the City taking enforcement actions that would result in the assessment of administrative fine, mandatory compliance order, or civil or criminal actions. The Industrial User will be advised prior to the hearing of the seriousness of the meeting and the possible outcomes of the meeting. The Industrial User will be encouraged to prepare documents to support their position and describe improvement already made or planned.

8.2.3.3 Compliance Order

A Compliance Order is issued against an Industrial User who has violated or continues to violate any provision of Lathrop Municipal Code Chapter 13.26, a Wastewater Discharge Permit, or any other Pretreatment Standard or requirement, stating that following a specific period, sewer service will be disconnected unless adequate treatment facilities, devices, or other related appurtenances have been installed and are properly operated.

8.2.3.4 Cease-and-Desist Order

A Cease-and-Desist Order is used when the City finds that an Industrial User has violated, or continues to violate, any provision of Lathrop Municipal Code Chapter 13.26, a Wastewater Discharge Permit, an enforcement order, or Pretreatment Standard or requirement, or that the Industrial User's past violations are likely to recur. The Cease-and-Desist Order will direct the Industrial User to (1) immediately comply with all requirements; and/or (2) take such appropriate remedial or preventive action as may be needed to properly address a continuing or threatened violation, including halting operations and/or terminating the discharge. Issuance of a Cease-and-Desist Order shall not be a bar against, or a prerequisite for, taking any other action against the Industrial User.

8.2.3.5 Suspension of Wastewater Service Order

As set forth in Lathrop Municipal Code Section 13.26.110(G), the City may immediately suspend an Industrial User's discharge after providing informal notice whenever such suspension is necessary to stop an actual or threatened discharge which reasonably appears to present or cause an imminent or substantial endangerment to the health or welfare of persons. The City may also immediately suspend an Industrial User's discharge, after notice and opportunity to

respond, that threatens to interfere with the operation of the CTF, or that presents, or may present, an endangerment to the environment.

8.2.4 Revocation of Permit

As set forth in Lathrop Municipal Code Section 13.26.050(L), the City may revoke a Wastewater Discharge Permit for good cause, including, but not limited to, the following reasons:

1. Failure to notify the City of significant changes to the wastewater prior to the changed discharge;
2. Failure to provide prior notification to the City of changed conditions pursuant to Lathrop Municipal Code Section 13.26.060(F);
3. Misrepresentation or failure to fully disclose all relevant facts in the Wastewater Discharge Permit Application;
4. Falsifying self-monitoring reports;
5. Tampering with monitoring equipment;
6. Refusing to allow the City timely access to the facility premises and records;
7. Failure to meet effluent limitations, violation of any pretreatment standard or requirement, or any terms of the Wastewater Discharge Permit or Lathrop Municipal Code Chapter 13.26;
8. Failure to pay fines;
9. Failure to pay sewer charges;
10. Failure to meet compliance schedules;
11. Failure to complete a wastewater survey or the Wastewater Discharge Permit Application; or
12. Failure to provide advance notice of the transfer of business ownership of a permitted facility.

8.2.5 Water Supply Severance

As set forth in Lathrop Municipal Code Section 13.26.130(C), whenever an Industrial User has violated or continues to violate any provision of Lathrop Municipal Code Section 13.26, a Wastewater Discharge Permit, an enforcement order, or Pretreatment Standard or requirement, water service to the Industrial User may be severed. Water service will only recommence at the Industrial User's expense after it has satisfactorily demonstrated its ability to comply.

8.2.6 Termination of Sewer Service

Termination of sewer service is the revocation of an Industrial User's privilege to discharge industrial wastewater into the City's sewer system. Termination may be accomplished by physical severance of the industry's connection to the collection system, by issuance of an enforcement order that compels the Industrial User to terminate its discharge, or by a court ruling. However, since termination of service may force industries to halt production and may force closure, the City must carefully consider all the legal and operational implications of termination before using this enforcement response. Lathrop Municipal Code Sections 13.26.110(G), *Emergency Suspensions* and 13.26.110(H), *Termination of Discharge* establish the City's right to terminate sewer services to Industrial Users.

Termination of sewer service is an appropriate response to Industrial Users that have not responded adequately to enforcement orders. When the City must act immediately to halt or prevent a discharge that presents a threat to human health, the environment or the CTF, Cease-and-Desist Orders and Suspension of Wastewater Service Orders are appropriate responses. Assuming other enforcement responses are unsuccessful, the types of violations warranting termination of service are listed below.

1. Unauthorized discharges that create a dangerous situation threatening human health, the environment, or the CTF.

2. Discharges that exceed Local Limits or Categorical Pretreatment Standards and result in damage to the environment.

3. Slug loads causing Interference, Pass Through, or damage to human health, the environment, or the CTF.

4. Failure of the Industrial User to notify the City of effluent limit violations or slug discharge which resulted in environmental or CTF damage.

5. Complete failure of the Industrial User to sample, monitor, or report as required by an enforcement order.

6. Major violation of a Wastewater Discharge Permit condition or enforcement order accompanied by evidence of negligence or intent.

A Cease-and-Desist Order is appropriate to use if prior enforcement orders have been issued to the Industrial User. A Suspension of Wastewater Service Order is appropriate after informal notice and to address an imminent or substantial endangerment.

8.2.7 Administrative Fines

Administrative fines do not require court intervention unless the Industrial User contests the action or refuses to pay the fine. Fines are to recapture the full or partial economic benefit on noncompliance and to deter future violations.

8.2.7.1 Municipal Code Definitions

Administrative fines are set for in Lathrop Municipal Code Section 13.26.110(F) as follows.

1. When the City finds that an Industrial User has violated, or continues to violate, any provision of Lathrop Municipal Code Chapter 13.26, a Wastewater Discharge Permit or order issued hereunder, or Pretreatment Standard or requirement, the City may fine such Industrial User in an amount not to exceed one thousand dollars ($1,000.00). Such fines shall be assessed on a per violation, per day basis. In the case of monthly or other long term average discharge limits, fines shall be assessed for each day during the period of violation.

2. Unpaid charges, fines, and penalties shall, after sixty (60) calendar days, be assessed an additional penalty of twenty-five percent (25%) of the unpaid balance, and interest shall accrue thereafter at a rate of one percent per month. A lien against the Industrial User's property will be sought for unpaid charges, fines, and penalties.

3. Industrial Users desiring to dispute such fines must file a written request for the City to reconsider the fine along with full payment of the fine amount within thirty (30) days of being notified of the fine. Where a request has merit, the City may convene a hearing on the matter. In the event the Industrial User's appeal is successful, the payment, together with any interest accruing thereto, shall be returned to the Industrial User. The City may add the costs of preparing administrative enforcement actions, such as notices and orders, to the fine.

4. Issuance of an administrative fine shall not be a bar against, or a prerequisite for, taking any other action against the Industrial User.

8.2.7.2 When to Assess Administrative Fines

Administrative fines are recommended as an escalated enforcement response, particularly when enforcement orders have not prompted a return to compliance. Whether administrative fines are appropriate responses to noncompliance also depends greatly on the circumstances surrounding the violation. When using this enforcement response, either singly or in conjunction with another response, the City should consider the following factors.

1. The type and severity of the violation.

2. The number of violations that occurred (e.g., violation of more than one discharge limitation).

3. The duration of the noncompliance.

4. The impact of the violation on the wastewater treatment plant and the environment.

5. Whether the violation threatened human health.

6. Whether the Industrial User derived any economic benefit or savings from the noncompliance.

7. The compliance history of the Industrial User (e.g., recurrence frequency of violation).

8. Whether the Industrial User is making good faith efforts to restore compliance.

9. Other policy consideration normally involved in an enforcement decision.

8.2.7.3 Method for Assessing Administrative Fines

Once the violation is documented and an appropriate fine amount is determined, the City shall notify the Industrial User of the fine by issuance of an enforcement order (e.g., Consent Order, Compliance Order). The enforcement order shall specify the violation, the actions required to return to compliance, and the amount of the fine assessed. The enforcement order shall specify the method of payment and the due date.

8.2.8 Civil Penalties

Civil litigation is the formal process of filing a lawsuit against an Industrial User to secure court-ordered action to correct violations and secure penalties for violations, including recovery of costs to the City from noncompliance. Civil litigation is an appropriate enforcement response in (1) emergency situations where injunctive relief if necessary to halt or prevent discharges that threaten human health or the environment or interfere with the CTF; (2) when efforts to restore compliance through cooperation with the Industrial User have failed and a court supervised settlement consent decree is necessary to enforce program requirements; (3) to impose civil penalties and recover losses incurred due to the noncompliance. The City's legal authority to seek or assess civil penalties is established in Lathrop Municipal Code Section 13.26.120, *Judicial Enforcement Remedies*, as follows.

1. An Industrial User who has violated, or continues to violate, any provision of Lathrop Municipal Code Chapter 13.26, a Wastewater Discharge Permit, or enforcement order, or Pretreatment Standard or requirement shall be liable to the City for a maximum civil penalty of one thousand dollars ($1,000.00) per violation, per day. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation.

2. The City may recover reasonable attorneys' fees, court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred by the City.

3. In determining the amount of civil liability, the court shall take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the Industrial User's violation, corrective actions by the Industrial User, the compliance history of the Industrial User, and any other factor as justice requires.

4. Filing a suit for civil penalties shall not be a bar against, or a prerequisite for, taking any other action against an Industrial User.

8.2.9 Criminal Penalties

Criminal prosecution is the formal process of charging individuals and/or organizations with violations of ordinance provisions that are punishable, upon conviction, by fines and/or imprisonment. Criminal prosecution is appropriate when the City has evidence of noncompliance that shows criminal intent. It may also be appropriate in cases involving repeated violations, aggravated violations (such as discharges that endanger the health of the environment or CTF employees), and when other formal efforts to restore compliance through enforcement orders have failed. Criminal prosecution may be brought prior to, concurrently with, or subsequent to civil litigation. Criminal Penalties are established in Lathrop Municipal Code Section 13.26.120, *Judicial Enforcement Remedies*, as follows.

1. An Industrial User who willfully or negligently violates any provision of Lathrop Municipal Code Chapter 13.26, a Wastewater Discharge Permit, enforcement order, or Pretreatment Standard or requirement shall, upon conviction, be guilty of a misdemeanor, punishable by a fine of not more than one thousand dollars ($1,000.00) per violation, per day, or imprisonment for not more than six months, or both.

2. An Industrial User who willfully or negligently introduces any substance into the CTF which causes personal injury or property damage shall, upon conviction, be guilty of a misdemeanor and be subject to a penalty of at least one thousand dollars ($1,000.00) and be subject to imprisonment for not more than six months, or both. This penalty shall be in addition to any other cause of action for personal injury or property damage available under state law.

3. An Industrial User who knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to Lathrop Municipal Code Chapter 13.26, a Wastewater Discharge Permit, or enforcement order, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under Lathrop Municipal Code Chapter 13.26 shall, upon conviction, be punished by a fine of not more than one thousand dollars ($1,000.00) per violation, per day, or imprisonment for not more than six months, or both.

4. In the event of a second conviction, an Industrial User shall be punished by a fine of not more than one thousand dollars ($1,000.00) per violation, per day, or imprisonment for not more than six months, or both.

8.3 Enforcement Response Times

The City has established the following time frames for enforcement responses.

1. All violations will be identified and documented within five (5) days of receiving compliance information.

2. Initial enforcement responses involving contact with the Industrial User and requesting information on corrective or preventative action(s) will occur within fifteen (15) days of violation detection.

3. Follow up actions for continuing or recurring violations will be taken within thirty (30) days of the initial enforcement. For all continuing violations, the response will include a compliance schedule.

4. Violations which threaten health, property or environmental quality are considered emergencies and will receive immediate responses such as halting the discharge or terminating service.

5. All violations meeting the criteria for Significant Noncompliance will be addressed with an enforceable order within thirty (30) days of the City determining or becoming aware of Significant Noncompliance.

8.4 Tracking Enforcement Related Situations

The City utilizes hard copy records and electronic spreadsheets to track Industrial User compliance.

8.5 Enforcement Response Guide

The City will use the Enforcement Response Guide in **Table 8-1** to select the appropriate response to noncompliance. This guide identifies types of violations, initial and follow-up responses, and designated City personnel for the responses. The Enforcement Response Guide is used as follows.

1. Locate the category header related to the noncompliance issue or event in Table 8-1 (e.g., Unauthorized Discharge).

2. Locate the nature of the violation in the first column of Table 8-1.

3. Identify the appropriate enforcement response(s) in the second column of Table 8-1 considering the magnitude of the violation, duration of violation, effects, compliance history, and good faith efforts by the Industrial User.

4. Identify personnel for implementing enforcement action in the third column of Table 8-1.

The City will track the Industrial User's response and follow-up with escalated enforcement action if a response is not received or violation continues.

Table 8-1. Enforcement Response Guide

Nature Of Violation	Enforcement Response	Designated City Personnel
Unauthorized Discharge		
IU unaware of requirements; no harm to POTW or environment.	Informal notification (e-mail) with WDP Application attached requiring submittal within 30 calendar days.	CE
IU unaware of requirements; harm to POTW or environment is evident. (Significant Noncompliance)	1. Cease-and-Desist Order; Issuance of a Compliance Order requiring submittal of a WDP Application within 30 calendar days and assessing any penalties or recovery of damages and costs.	DPW
	2. Termination of service and civil litigation or criminal investigation	DPW CA
IU has not submitted WDP Application by deadline.	Informal notification (phone call or e-mail). Require submittal within 15 calendar days or further enforcement action will be pursued.	CE
IU has not submitted WDP Application within 15 calendars days of date of informal notification. (Significant Noncompliance)	NOV for missed deadline and Show Cause Order requiring the IU to appear before the DPW to show cause as to why further enforcement should not be pursued.	DPW
Failure to submit WDP Application continues more than 60 days after receipt of NOV by the IU. (Significant Noncompliance)	1. Civil Litigation	DPW CA
	2. Termination of Service	DPW
Discharge Limit Violation		
Type A: exceed one or more daily or average parameter limits by less than a factor of 3.0.	NOV detailing violation and requiring repeat sampling and analysis within 30 days of becoming aware of the violation and submit results to CE.	DPW
Type B: exceed one or more daily or average parameter limits by a factor of 3.0 or greater. (Significant Noncompliance)	NOV detailing violation and requiring correction within 30 business days. Industry must repeat sampling and analysis within 30 days of becoming aware of the violation and submit results to CE. Penalties to be assessed by Compliance Order for each day of violation.	DPW
Type C: Chronic and/or TRC violation. (Significant Noncompliance)	Show Cause Order requiring the IU to appear before the DPW to show cause why further enforcement should not be pursued. Further actions (if warranted) will be addressed in a Compliance Order.	DPW
Type D: violation of any daily or average parameter limit which adversely affects the POTW. Interference, inhibition, or Pass Through. (Significant Noncompliance)	Cease-and-Desist Order requiring the IU to halt the violation immediately or terminate the discharge altogether. Issuance of a Compliance Order assessing any penalties and/or cost recovery.	DPW

Table 8-1. Enforcement Response Guide

Nature Of Violation	Enforcement Response	Designated City Personnel
Wastewater Discharge Permit Reporting Violations		
Report is improperly signed or certified.	Informal notification (phone call or e-mail) requiring correction of unsigned/uncertified report.	CE
Report is improperly signed or certified after informal notification.	NOV requiring correction of unsigned/ uncertified report.	DPW
Report is improperly signed or certified after issuance of NOV. (Significant Noncompliance)	Compliance Order assessing a penalty and requiring the IU to properly sign or certify the report and subsequent reports.	DPW
Report late by less than 30 calendar days.	Informal notification (phone call or e-mail).	CE
Report late 30 calendar days or more.	Informal meeting between the IU and the Compliance Engineer. NOV requiring report submittal no later than 45 days from the original report deadline.	DPW
Report late 45 calendar days or more. (Significant Noncompliance)	Show Cause Order requiring the IU to appear before the DPW to show cause why further enforcement should not be pursued.	DPW
Report late 60 calendar days or more. (Significant Noncompliance)	Compliance Order requiring IU to submit the required report within 15 calendar days.	DPW
Report late 90 calendar days or more. (Significant Noncompliance)	Civil litigation.	DPW CA
Failure to report spills or changed discharge. (No harm to POTW or environment). Isolated incident.	NOV and Compliance Order requiring the IU to develop and implement a spill prevention plan by a specified deadline.	DPW
Failure to report spills or changed discharge (Harm to the POTW or environment) (Significant Noncompliance)	Cease-and-desist Order requiring IU to halt the illegal discharge immediately or terminate its discharge altogether. Issuance of a Compliance Order assessing a penalty per day of violation and addressing cost recovery	DPW
Repeated Failure to report spills. (Significant Noncompliance)	Show Cause Order requiring the IU to appear before the DPW to show cause why further enforcement should not be pursued.	DPW
Inadequate Recordkeeping		
Compliance Engineer finds files incomplete or missing (no evidence of intent).	Informal notice (phone call or e-mail) explaining the required recordkeeping and documentation.	CE
Recurring.	Compliance Order requiring proper maintenance of records. Assessment of penalty to be issued on severity of violation.	DPW
Failure To Report Additional Monitoring		
Compliance Engineer learns of unreported monitoring data.	NOV requiring submittal of all additional monitoring data.	DPW
Recurring (considered falsification).	Compliance Order requiring submittal of all additional monitoring data. Assessment of a penalty to be based on the severity of the violation.	DPW

Table 8-1. Enforcement Response Guide

Nature Of Violation	Enforcement Response	Designated City Personnel
Falsification		
First occurrence. (Significant Noncompliance)	Show Cause Order requiring the IU to appear before the DPW to show cause why enforcement action should not be pursued.	DPW
Subsequent occurrences. (Significant Noncompliance)	Civil litigation.	DPW CA
Improper Monitoring		
Failure to monitor all pollutants as required by IU's WDP.	Informal notification (phone call or email) to review required sampling and reporting.	CE
Failure to monitor all pollutants as required by IU's WDP (second occurrence).	NOV requiring complete sampling and analysis with report due no later than 30 calendar days from receipt of NOV	DPW
Recurring failure to monitor properly (third occurrence) (Significant Noncompliance)	Show Cause Order requiring the IU to appear before the DPW to show cause why further enforcement should not be pursued.	DPW
Improper Sampling (Sample Type, Sample Location, or Collection Technique).		
No evidence of intent (first violation).	Informal notification (phone call, email, or meeting) explaining correct procedure and requiring proper sampling for the next self-monitoring report.	CE
Improper sampling continues (second violation).	Informal meeting with IU to review proper sampling criteria.	CE
Evidence of intent (failure to properly sample after informal meeting is viewed as evidence of intent). (Significant Noncompliance)	NOV requiring proper sampling and Show Cause Order requiring the IU to appear before the DPW to show cause why further enforcement should not be pursued.	DPW
Failure to Install Monitoring Equipment as Set forth in Wastewater Discharge Permit or Compliance Order		
Missed final installation deadline	NOV requiring complete installation within 30 calendar days of receipt of NOV.	DPW
Non-Compliance with NOV (delay of more than 30 calendar days). (Significant Noncompliance)	Compliance Order requiring final installation by a specified deadline. Assessment of a daily penalty if the requirements of the Compliance Order are not met.	DPW
Compliance Schedules (In a Wastewater Discharge Permit or Order)		
Missed interim milestone date by less than 30 days will not affect final compliance deadline.	NOV which restates any remaining milestone deadlines.	DPW
Missed interim milestone date by less than 30 days and will affect final compliance deadline.	Compliance Order detailing revised compliance schedule. Order may assess fines if delay was avoidable (no good cause)	DPW
Missed interim milestone date by more than 30 days and will not affect final compliance deadline.	Informal meeting with IU to review compliance schedule, milestone dates, and final compliance deadline.	DPW
Missed interim milestone date by more than 30 days and will affect final compliance deadline.	Show Cause Order requiring the IU to appear before the DPW to show cause why further enforcement should not be pursued. Must result in a revised Compliance Order.	DPW
Missed interim milestone date by more than 90 days. (Significant Noncompliance)	Civil Litigation	DPW CA

Table 8-1. Enforcement Response Guide

Nature Of Violation	Enforcement Response	Designated City Personnel
Missed Final Compliance Deadline		
Failure to comply with an enforcement order	Compliance Order assessing a penalty per day past the final compliance deadline and requiring immediate compliance.	DPW
	Civil litigation should be pursued if the IU has not complied within 30 calendar days of the original Final Compliance Deadline	CA
Wastestreams are Diluted		
Dilution of regulated wastestreams with non-polluted water.	NOV citing regulatory prohibition against dilution and requiring correction within 30 calendar days of receipt of the NOV	DPW
Recurring violations (Dilution continues to occur after NOV).	Informal meeting with the IU to review municipal code prohibitions. Issuance of a Compliance Order with deadline for correction.	DPW
Failure To Mitigate Noncompliance or Halt Production		
Failure to reduce the severity of the violation(s) and/or failure to comply with a Cease-and-Desist Order.	Civil prosecution seeking an injunction to halt discharge. Termination of WDP and service if potential for POTW and/or environmental harm is evident.	DPW CA
Entry Denial		
Entry denied or consent withdrawn. Record access denied.	Obtain warrant and return to IU	DPW
Illegal Discharge (Violation of Standards [40 CFR 403.5(a) and (b)])		
No harm to POTW or environment; no Interference or Pass Through at the POTW.	NOV explaining the General Prohibited Discharge Standards as contained in 40 CFR 403.5(a) and (b).	DPW
Discharge causes harm, Pass Through, or Interference.	Cease-and-Desist Order requiring the IU to halt the violation immediately or terminate the discharge altogether. Issuance of a Compliance Order assessing any penalties and/or cost recovery	DPW
Failure to Properly Operate and Maintain Pretreatment Facility		
No violation results from failure of IU to properly operate and maintain facility.	Informal notification (phone call or e-mail) explaining the requirement to properly operate and maintain pretreatment facilities.	CE
Violations of WDP or Pretreatment Standards occur because of failure of IU to properly maintain and operate pretreatment facility.	Compliance Order requiring proper maintenance and operation of pretreatment facility with schedule of compliance.	DPW
Recurring violation or failure to meet compliance schedule; no harm to POTW.	Assessment of a penalty to be based on the severity of the violation,	DPW CA
Recurring violation or failure to meet compliance schedules; harm to POTW.	Civil Litigation; Termination of WDP; Termination of Service; Assessment of Administrative Fines and Cost Recovery	DPW CA

CA = City Attorney; CE = Compliance Engineer; CFR = Code of Federal Regulations; DPW = Director of Public Works; IU = Industrial User; NOV = Notice of Violation; POTW = publicly owned treatment works; TRC = Technical Review Violation; WDP = Wastewater Discharge Permit

Preventing Sewer Back-Ups & Sewer Overflows

What To Do:

- Collect grease in a container and dispose of it in the garbage.
- Place food scraps in waste containers or garbage bags for disposal with solid waste, or start a compost pile.
- Place a wastebasket in the bathroom to dispose of solid waste. Disposable diapers, condoms and personal hygiene products do not belong in the sewer system.
- These suggestions can save you money too! Most sewer back-ups occur between the house and the City's sewer main, where the property owner is responsible for correcting the problem. Avoiding blockages means avoiding plumbing bills. When the blockage occurs in the City's sewer main, the City will correct the problem. Please call the Public Works Department at (209) 941-7430, to report a sewer back-up or overflow. After hours call the after-hours emergency number, (209) 992-0028.

What Not To Do:

- Pour grease, fats and oils from cooking down the drain.
- Use the toilet as a wastebasket.
- Use the sewer as a means to dispose of food scraps.

PUBLIC WORKS DEPARTMENT

Phone: (209) 941-7430

Fax:: (209) 941-7449

E-mail:: pweng@ci.lathrop.ca.us

When a sewer overflows, it is usually the result of inappropriate materials in the sewer system. Please Help the City Prevent Sewer Back-ups and Overflows!

Have you ever experienced a sanitary sewer back-up or overflow? Luckily, most sewer back-ups and overflows can be prevented with a progressive preventive maintenance program. All of us can help to prevent them by wisely using the City Of Lathrop's sanitary sewer system. The City is "recruiting" customer partners who are willing to join our efforts to prevent sewer back-ups and overflows.

Sewer back-ups and overflows are frequently caused by improper materials such as fats, oils and grease being placed into the sewer system by the City's customers. Since fats, oils and grease are lighter than water, they tend to accumulate at the top and sides of sewer pipes and can build up until a blockage occurs. If a blockage happens, the sewer backs up or overflows resulting in property and environmental damage.

The City of Lathrop's Sewer Use Ordinance requires that restaurants should install and maintain grease traps and/or interceptors to prevent grease from entering the sewer system. However, there are many more residential kitchens than there are restaurants in Lathrop. By reducing the amount of fats, oils and grease that enter the sewer system from homes, you can help to protect the environment by preventing sewer back-ups and overflows.

Sanitary sewer systems are designed to handle three things: used water, human body waste, and toilet paper. You can do some simple things that will help the City protect water quality and maintain the sewer system in Lathrop.

APPENDIX F – Element 8 (System Evaluation, Capacity Assurance, and Capital Improvements) Supporting Documents

1. Table F-1. Current and Historical ADWF and Per Capita ADWF
2. Table F-2. Projected Wastewater Flow by Development Area
3. Table F-3. Existing and Future Wastewater Flow by Development Area
4. Table F-4 Peak Wet Weather Flow at Pump Stations.
5. Table F-5. Summary of Capital Improvement Projects
6. Figure F-1. Overview of Capital Improvement Projects

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Table F-1. Current and Historical ADWF and Per Capita ADWF

Year	Average Dry Weather Flow (ADWF) (a)			ADWF vs. AAF (c)	Annual Rainfall (d) (in)	Per Capita ADWF (e) (gallon per capita per day)
	MWQCF (MGD)	CTF (b) (MGD)	Total (MGD)			
2009	0.701	0.257	1.134	98%	10.48	64
2010	0.697	0.266	1.116	97%	18.70	62
2011	0.710	0.276	1.120	97%	10.09	60
2012	0.779	0.274	1.152	98%	13.54	60
2013	0.950	0.299	1.358	102%	14.59	69
2014	0.896	0.304	1.342	99%	14.23	67
2015	0.857	0.335	1.328	98%	7.43	64
2016	0.874	0.383	1.405	96%	18.28	64
2017	0.97	0.701	1.673	108%	16.60	72
2018	1.10	0.705	1.803	105%	14.15	75
2019	1.11	0.663	1.771	98%	17.05	70
2020	1.14	0.880	2.020	106%	5.97	75
2021	0.97	1.007	1.974	102%	14.18	67
2022	1.12	1.083	2.203	101%	11.41	70

Notes:

(a) ADWF is calculated as the average daily flow between June and August of the year. Totals may not sum due to rounding.
(b) Flows to the CTF includes flows to the Crossroads WWTF prior to its conversion and connection to the CTF in August 2015.
(c) The ratio of AAF to ADWF is calculated using AAF values from Table 4-1.
(d) Precipitation data obtained from National Oceanic and Atmospheric Administration Stockton Airport Station (USW00023237).
(e) Per capita ADWF is calculated using City population data in Table 4-1.

Table F-2. Projected Wastewater Flow by Development Area

Land Use Designation	Wastewater Flow Factor	Projected New Wastewater Flow (gpd) (a)				
		2025	2030	2035	2040	Buildout 2045
Central Lathrop Phase 1						
Low Density Residential	240 gpd/du	0	120,000	183,360	183,360	183,360
High Density Residential	110 gpd/du	0	27,060	50,160	63,690	63,690
Commercial	755 gpd/ac	9,815	55,538	55,538	55,538	109,898
Mixed Use	755 gpd/ac	0	0	0	0	38,505
Parks	55 gpd/ac	0	2,149	2,424	2,424	2,424
New Central Lathrop ADWF		9,815	204,747	291,482	305,012	397,877
Central Lathrop - Phase 2						
Light Industrial / R&D Flex	240 gpd/ac	21,557	21,557	21,557	21,557	163,620
Parks	55 gpd/ac	0	0	0	0	275
New Central Lathrop ADWF		21,557	21,557	21,557	21,557	163,895
Mossdale Landing						
Low Density Residential	240 gpd/du	0	0	0	0	15,840
Medium Density Residential	200 gpd/du	0	0	0	0	0
High Density Residential	110 gpd/du	0	0	0	0	0
Commercial	755 gpd/ac	3,443	4,575	4,575	4,575	4,575
Schools	220 gpd/ac	0	0	0	0	3,573
New Mossdale ADWF		3,443	4,575	4,575	4,575	23,988
Mossdale Landing East						
Low Density Residential	240 gpd/du	0	8,880	8,880	8,880	8,880
High Density Residential	110 gpd/du	0	0	0	0	9,240
Commercial	755 gpd/ac	0	5,285	5,285	5,285	5,285
New Mossdale ADWF		0	14,165	14,165	14,165	23,405
Mossdale Landing South						
Medium Density Residential	200 gpd/du	17,000	17,000	17,000	17,000	17,000
Commercial	755 gpd/ac	0	0	6,040	6,040	18,875
Parks	55 gpd/ac	0	220	220	220	220
New Mossdale ADWF		17,000	17,220	23,260	23,260	36,095
Mossdale Landing West						
Low Density Residential	240 gpd/du	0	0	198,960	198,960	198,960
Parks	55 gpd/ac	0	0	603	603	603
New Mossdale ADWF		0	0	199,563	199,563	199,563
River Islands						
Low Density Residential	200 gpd/du	153,600	397,200	640,800	884,400	884,400
Medium Density Residential	155 gpd/du	104,780	251,255	397,730	544,205	544,205
High Density Residential	110 gpd/du	0	153,450	306,900	460,350	460,350
Town Center	755 gpd/ac	0	19,857	39,713	59,570	59,570
Commercial	755 gpd/ac	0	65,006	130,011	195,017	195,017
Schools	220 gpd/ac	7,150	10,450	13,750	16,830	16,830
Parks	55 gpd/ac	1,045	4,395	7,750	11,105	11,105
New River Islands ADWF		266,575	901,612	1,536,654	2,171,476	2,171,476
South Lathrop						
Light Industrial / R&D Flex	240 gpd/ac	0	16,080	16,080	16,080	23,940
Office Commercial	755 gpd/ac	0	6,644	6,644	6,644	7,550
Open Space	55 gpd/ac	0	0	0	0	0
New South Lathrop ADWF		0	22,724	22,724	22,724	31,490
Lathrop Gateway						
Light Industrial / R&D Flex	240 gpd/ac	0	15,840	15,840	19,824	19,824
Office Commercial	755 gpd/ac	0	38,505	38,505	47,339	47,339
Open Space	55 gpd/ac	0	138	138	226	226
New Lathrop Gateway ADWF		0	54,483	54,483	67,388	67,388

Table F-2. Projected Wastewater Flow by Development Area (Cont.)

Land Use Designation	Wastewater Flow Factor	Projected New Wastewater Flow (gpd) (a)				
		2025	2030	2035	2040	Buildout 2045
Crossroads						
Industrial	240 gpd/ac	0	5,520	5,520	5,520	5,520
Commercial	755 gpd/ac	0	1,133	1,133	1,133	1,133
New Crossroads ADWF		0	6,653	6,653	6,653	6,653
Historic Lathrop and Other Development Areas						
Low Density Residential	240 gpd/du	0	2,880	4,320	5,520	12,480
Medium Density Residential	200 gpd/du	5,400	10,600	15,800	21,000	43,600
High Density Residential	110 gpd/du	0	0	0	0	5,280
Commercial	755 gpd/ac	16,610	26,878	26,878	26,878	32,918
Industrial	240 gpd/ac	4,320	4,320	4,320	4,320	10,080
New Historic Lathrop / Other ADWF		26,330	44,678	51,318	57,718	104,358
Sharpe Army Depot						
Industrial	--	32,000	32,000	32,000	32,000	32,000
New Sharpe Army Depot ADWF		32,000	32,000	32,000	32,000	32,000
Total Projected New ADWF		**376,720**	**1,324,413**	**2,258,433**	**2,926,091**	**3,258,188**
PROJECTED NEW ADWF AT CTF		***318,390***	***1,247,735***	***2,175,115***	***2,836,373***	***3,121,830***
PROJECTED NEW ADWF AT MWQCF		***58,330***	***76,678***	***83,318***	***89,718***	***136,358***

Notes:

(a) Projected residential wastewater generation calculated as the total number of projected residential dwelling units multiplied by the applicable wastewater flow factor (Table 4-3). Projected non-residential wastewater flow are calculated as the total projected acreage multiplied by the applicable wastewater flow factor (Table 4-3). Projected residential dwelling units and non-residential acreage are listed in Table 2-1.

Table F-3. Existing and Future Wastewater Flow by Development Area

Development Area (a)	Wastewater Generation (MGD) (a)					
	Baseline (b)	2025	2030	2035	2040	Buildout 2045
Lathrop CTF						
Central Lathrop and Mossdale (c)	0.46	0.51	0.73	1.02	1.03	1.31
River Islands	0.44	0.71	1.35	1.98	2.62	2.62
South Lathrop	0.002	0.002	0.025	0.025	0.025	0.034
Lathrop Gateway and Crossroads (c)	0.28	0.28	0.34	0.34	0.36	0.36
ADWF at CTF	**1.19**	**1.51**	**2.44**	**3.37**	**4.03**	**4.31**
Manteca						
Historic Lathrop and Other Development Areas	1.22	1.28	1.30	1.30	1.31	1.36
ADWF at MWQCF	**1.22**	**1.28**	**1.30**	**1.30**	**1.31**	**1.36**
TOTAL EXISTING ADWF (b)	**2.41**	**2.79**	**3.73**	**4.67**	**5.34**	**5.67**

Notes:

(a) Projected wastewater generation calculated as the sum of baseline wastewater generation and the incremental new wastewater generation associated with future development shown in Table 4-4.

(b) Baseline wastewater generation is based on the existing wastewater generation in 2022 at 2.12 MGD with a 10% factor of safety to account for future I&I.

(c) Development areas served by the Lathrop CTF are grouped due to the availability of existing pump station flow data. Central Lathrop and Mossdale ADWF is estimated using flow from the Mossdale PS. Crossroads and Lathrop Gateway ADWF are estimated as the LCTF flow minus flow from the River Islands, Mossdale, and South Lathrop pump stations.

(d) Totals may not sum due to rounding.

Table F-4 Peak Wet Weather Flow at Pump Stations.

Lift Station or Pump Station	Existing			Buildout		
	ADWF (mgd)	Peaking Factor	PWWF (mgd)	ADWF (mgd)	Peaking Factor	PWWF (mgd)
MWQCF Collection System						
North Harlan PS	0.017	4.4	0.076	0.040	4.2	0.168
Stonebridge LS	0.158	3.6	0.561	0.158	3.6	0.561
Woodfield LS	0.382	2.8	1.071	0.389	2.8	1.083
Valley Crossing LS	0.009	4.4	0.039	0.009	4.4	0.039
J Street LS	0.270	3.1	0.842	0.315	3.0	0.938
Easy Court LS	0.081	4.0	0.322	0.083	4.0	0.327
O Street PS	0.518	2.5	1.317	0.583	2.5	1.431
McKinley Avenue PS	0.564	2.5	1.398	0.575	2.5	1.417
Lathrop CTF Collection System						
Central Lathrop PS	0.069	4.0	0.279	0.630	2.4	1.511
Mossdale PS	0.579	2.5	1.424	0.861	2.2	1.913
River Islands 2A PS	0.183	3.4	0.629	1.395	2.1	2.905
River Islands Main PS	0.493	2.6	1.273	2.658	2.1	5.45
Crossroads PS	0.043	4.2	0.182	0.054	4.1	0.223
South Lathrop PS	0.0003	4.5	0.001	0.032	4.3	0.136
Lathrop Gateway PS	0.01	4.5	0.03	0.07	4.0	0.286

Notes:

(a) Flow information is not available for the Louise Avenue PS.

Table F-5. Summary of Capital Improvement Projects

Project Number	Project	Timeframe	Addresses Modeled Surcharging in Existing Scenario	Total Project OPC (a)
Treatment Facility Improvement Projects				
WWT-1	Manteca Interim Improvements	Near-term (b)	--	--
WWT-2	CTF Phase 3 Expansion (WW 22-38)	Near-term (c)	--	$23,700,000
WWT-3	CTF Surface Water Discharge (WW 20-17) (d)	Existing	--	$12,699,000
			Total Treatment Facility Improvements OPC	**$36,399,000**
Collection System Improvement Projects				
WW-1	Stonebridge Gravity Main Replacement and Pump Station Upgrade (WW 22-25) (e)	Existing	No	$850,000
WW-2A	Woodfield West Deficiency Project - Alternative A (WW 22-26)	Existing (f)	No	$2,730,000
WW-2B	Woodfield West Deficiency Project - Alternative B (WW 22-26)	Existing (f)	No	$2,400,000
WW-4	J Street Gravity Main Replacement Project	Existing (f)	Yes	$1,690,000
WW-5	Easy Court / O Street Gravity Main Replacement Project	Existing	No	$1,370,000
WW-6	O Street Pump Station Upgrade	Existing	No	$1,560,000
			Total Collection System Improvements OPC	**$10,500,000**
Miscellaneous Collection System Projects				
WW-8	Temporary Flow Monitoring	--	--	$100,000
WW-9	Wastewater Lift Station Access Modifications (PW 24-14) (d)	FY 23-25 CIP		$475,000
WW-9	Ozone Upgrade for Wastewater Pump Stations (PW-24-15) (d)	FY 23-25 CIP		$75,000
			Total Miscellaneous Collection System Improvements OPC	**$650,000**
			TOTAL WASTEWATER SYSTEM IMPROVEMENTS OPC	**$47,649,000**

Notes:

(a) Costs shown are presented in December 2024 dollars based on an ENR CCI of 13,632.41 (20-city average).
(b) City is currently evaluating the appropriate level of contribution to improvements at the MWQCF.
(c) City is currently issuing a request for proposal to PACE which may update this project OPC.
(d) Project included as a part of the City of Lathrop Capital Improvement Programs Fiscal Years 2023-2025 report.
(e) Connecting North Harlan Rd businesses which currently pump into the Stonebridge collection system to the North Harlan Rd SSFM can be considered as an alternative.
(f) Project addresses existing deficiencies, however future development influences recommended pipe or pump sizes to be installed.

WW-1: Stonebridge Gravity Main Replacement and Parallel Force Main

WW-2B: Woodfield West Deficiency Project Alternative B

WW-2A: Woodfield West Deficiency Project - Alternative A

WW-4: J Street Gravity Main Replacement

WW-6: O Street PS Replacement

WW-5: Easy Court/O Street Gravity Main Replacement

DE LIMA RD

DOS REIS RD

LATHROP RD

LOUISE AV

YOSEMITE AV

GOLDEN VALLEY PKWY

RIVER ISLANDS PKWY

MCKINLEY AV

MWQCF

Lathrop CTF

Legend

- Sphere of Influence
- Approximate Area of WWTF
- Pump Station or Lift Station
- Pump Station or Lift Station Upgrade
- Force Main
- Gravity Main

Diameter of Replacement Sewer

- 8"
- 10"
- 12"
- 15"
- 18"

Diameter of New Force Main

- 6"

Abbreviations

CTF = Consolidated Treatment Facility
MWQCF = Manteca Water Quality Control Facility
WWTF = wastewater treatment facility

Notes

1. All locations are approximate.
2. A detailed map for each project is included in Appendix D.

Sources

1. Aerial photograph provided by ESRI's ArcGIS Online, 12 March 2024.

0 2,500 5,000
(Scale in Feet)

Recommended Collection System Improvement Projects

Wastewater System Master Plan Amendment
City of Lathrop
Lathrop, CA
December 2024
C20049.02

Figure 8-1

eki environment & water

Path: X:\C20049\Maps\2024\2\WW_Fig8-1_RecImprovements.aprx

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APPENDIX G – Element 9 (Monitoring, Measurement and Program Modifications)
Supporting Documents

1. SSMP Monitoring Tracking Sheet
2. SSMP Change Log

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CITY OF LATHROP
SEWER SYSTEM MANAGEMENT PLAN
MONITORING TRACKING SHEET

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
SSO Summary												
Total Number of SSOs	1	1	5	1	0	2	0	2	2	1	3	1
Total Volume of SSOs	100	100	2,360	5	0	340	0	650	22.5	75	161	1430
Vol of SSO Contained and/or Returned	100	100	2,360	5	N/A	340	N/A	650	4.5	75	161	1305
Vol of SSO Reached Surface Water	0	0	0	0	N/A	0	N/A	0	0.5	0	0	0
% of SSO Volume Contained and/or Returned	100%	100%	100%	100%	N/A	100%	N/A	100%	20%	100%	100%	91%
% of SSO Volume Reaching Waters	0%	0%	0%	0%	N/A	0%	N/A	0%	0%	0%	0%	0%
SSO by Cause												
Grease Deposition (FOG)	1	1	4	0	0	1	0	2	0	0	0	0
Debris	0	0	0	1	0	1	0	0	0	1	3	0
Capacity/Hydraulic Deficiency	0	0	0	0	0	0	0	0	0	0	0	0
Pump Station Failure	0	0	0	0	0	0	0	0	0	0	0	0
Other	0	0	1	0	0	0	0	0	2	0	0	1
SSO by Location												
Gravity Main SSO	1	1	5	1	0	2	0	2	1	1	2	0
Pump Station SSO	0	0	0	0	0	0	0	0	0	0	0	0
Force Main SSO	0	0	0	0	0	0	0	0	1	0	0	1
Maintenance Summary												
Length of Pipe Cleaned (ft)	--	10.8	15.7	7.9	10.2	0	0	0	10	0	0	0
Length of Pipe CCTV'ed (ft)	--	--	5	0.5	0	0	0	0	0	0	0	0

NOTE: SSO volumes measured in gallons

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CITY OF LATHROP
SEWER SYSTEM MANAGEMENT PLAN
CHANGE LOG

Date	SSMP Element /Section	Description of Change/Revision Made	Authorized By:
Jun 2025	All	• Comprehensive plan update for compliance with the Reissued 2022 WDR. • Updated Regulatory Requirements headers in each Element.	G. Gibson
Jun 2025	Introduction	• Updates to requirement background. • Move sections to Element 1.	G. Gibson
Jun 2025	1	• Updated sewer system figures. • Addition of sections moved from Introduction. • Update to SSMP update schedule.	G. Gibson
Jun 2025	2	• Addition of Compliance Engineering position. • Updates to Appendix for changes in organizational structure.	G. Gibson
Jun 2025	3	• Minor changes to text regarding Industrial Pretreatment Program Enforcement Response	G. Gibson
Jun 2025	4	• Updates to Appendix for changes to monitoring forms. • Updates regarding change to MaintainX system. • Updates to CCTV inspection. • Updates to training regiment.	G. Gibson
Jun 2025	5	• Minor changes to Section 5.3 text regarding 2024 update to City Standards.	G. Gibson
Jun 2025	6	• Minor text updates for changes in naming convention. • Updated spill categories.	G. Gibson
Jun 2025	7	• Minor text updates for changes in naming convention. • Updated Appendix for 2024 Industrial Pretreatment Program Enforcement Response Plan	G. Gibson
Jun 2025	8	• Comprehensive update to Element based on updates to the 2024 WWSMP Update • Updated Appendix tables from 2024 WWSMP.	G. Gibson

Date	SSMP Element /Section	Description of Change/Revision Made	Authorized By:
Jun 2025	9	• Minor text modification to reflect 6-year update schedule.	G. Gibson
Jun 2025	10	• Updates to text to reflect changes in audit intent and steps to distribute findings.	G. Gibson
Jun 2025	11	• Updates to text to reflect changes in spill emergency response plan.	G. Gibson
Jan 2023	Introduction	• Updated years for SSMP updates	G. Gibson
Jan 2023	4.5	• Updated link to City's bi-annual budget	G. Gibson
Jan 2023	8.3, 8.4, 8.5	• Updated date of last WWSMP update (2019); removed reference to 'draft'	G. Gibson
Jan 2023	8.4	• Updated link to City's adopted budget with its five-year CIP posted on City website	G. Gibson
Jan 2023	Appendix I	• Added public notification for SSMP 2023 update	G. Gibson
Aug 2022	Introduction	• Updated population, SSMP updates, # of pump stations, information on NPDES permit approval and anticipated date of operational discharge to SJR.	G. Gibson
Aug 2022	2,4	• Updated staff descriptions for new Utilities Superintendent and name change for PW O&M division that is now the PWD Utilities division. Updated City's authorized representative is now the Assistant City Manager and Senior Civil Engineer, and Utilities Superintendent and PW Admin Assistant are authorized Data Submitters in CIWIQS. Updated Table 2-1 due to changes in staff.	G. Gibson
Aug 2022	3	• Updated that City has adopted the 2019 California Plumbing Code in LMC Section 15.12.010	G. Gibson
Nov 2021	Introduction	• Update population, deleted paragraph re: industrial facilities that manage wastewater on-site, added information on pending NPDES permit for CTF, updated length of gravity mains, force mains and # of pump stations	G. Gibson

Date	SSMP Element /Section	Description of Change/Revision Made	Authorized By:
Nov 2021	2.3	• Updated Authorized Representatives to include Utility Plant Supervisor and PW Admin Asst are designated as Data Submitters in CIWQS	G. Gibson
Nov 2021	2, Table 2-1	• Deleted PWD Maintenance Supervisor as officials receiving notification of SSOs	G. Gibson
Nov 2021	4.5	• Updated information on CIP and biannual budget	G. Gibson
Nov 2021	5.3	• Updated date of most recent update to D&C Stds	G. Gibson
Nov 2021	7.3	• Updated number of FSEs	G. Gibson
Nov 2021	Appendix A	• Updated Fig. A-1 Org Chart, tables A-1 and A2	G. Gibson
Nov 2021	Appendix D	• Updated OERP List of Contacts	G. Gibson
Nov 2021	Appendix E	• Updated Table E-1 List of FSEs	G. Gibson
Nov 2021	Appendix G	• Updated SSMP Monitoring Tracking Sheet	G. Gibson
Nov 2021	Appendix I	• Deleted Public Notification for 2019 SSMP update (never completed)	G. Gibson
Oct 2019	Introduction	• Update COL Population	G. Gibson
Oct 2019	7, Appendix F	• Update table F-1 with list of FSEs, delete Figure F-1 showing location of FSEs	G. Gibson
Sept 2019	3	• Updated link to Lathrop Municipal Code	G. Gibson
Sept 2019	4, 8	• Updated link to 5 year CIP on City website	G. Gibson
Sept 2019	5	• Updated link to PWD D&C Stds. on City website • Updated date of most recent update to D&C Stds.	G. Gibson
Sept 2019	7	• Updated link to FOG Control Program	G. Gibson
Sept 2019	8	• Updated WW Flow Factors	G. Gibson
Sept 2019	Appendix A	• Updated Tables A-1 and A2	G. Gibson
Sept 2019	Appendix D	• Deleted former PW O&M Supt. name on page D-2 • Updated list of contacts • Corrected formula to calculate area of a circle on page D-19	G. Gibson
Sept 2019	Appendix E	• Updated list of emergency contacts	G. Gibson
Oct 2019	Appendix I	• Add Public Notification of SSMP 2019 update	G. Gibson

Date	SSMP Element /Section	Description of Change/Revision Made	Authorized By:
Feb 2018	Introduction	• Updated system description and statistics in the City Service Area and Sewer System section.	G. Gibson
Feb 2018	1	• Updated goals and condensed the number of goals.	G. Gibson
Feb 2018	2	• Updated the organization discussion in Section 2.3. • Updated organization chart, contact information, and descriptions of general responsibilities in Appendix A. • Added Table A-2, list of staff responsible for SSMP elements. • Updated SSO chain of communication and moved to the OERP in Appendix D. • Added City Manager, CDPH, CDF&G, SSJID to Table 2-1, officials receiving immediate notification of SSO per the OERP. Revised the circumstance for immediate notification to Cal OES to be consistent with the MRP	G. Gibson
Feb 2018	3	• Updated the Sewer Use Ordinance ERP and the FOG ERP. • Removed code sections from appendix and included link to City's website. • Added the City's CPC adoption in the Municipal Code discussion in Section 3.3. Updated "Prevention of Illicit Discharges" and "Enforcement Measures" discussions.	G. Gibson
Feb 2018	4	• Updated the collection system map discussion to reflect current City practices using a GIS database in Section 4.3. • Updated O&M activities and confirmed maintenance frequencies in Section 4.4. • Added a description of the SEMS asset management software to Section 4.5 and added a link to City's five-year CIP. • Added details regarding training programs in the training discussion in Section 4.6.	G. Gibson
Feb 2018	5	• Updated information regarding the 2014 Design and Construction Standards update and provided a link to the 2014 Design and Construction Standards. Removed Appendix D.	G. Gibson

Date	SSMP Element /Section	Description of Change/Revision Made	Authorized By:
		• Updated description regarding the role of the Senior Construction Inspector.	
Feb 2018	6	• Updated the SSO categories in the OERP discussion to match the OERP attached and the MRP.	G. Gibson
Feb 2018	OERP	• Made editorial changes to the OERP. • Added description of responses to private lateral blockages. • Added discussion of responses to overflows at the treatment plant. • Edited description of Category 1 SSO to be consistent with the MRP. • Added details regarding notification to internal managers to be consistent with Table 2-1. • Added a SSO Reporting Chain of Communication flow chart. • Updated OERP contact information.	G. Gibson
Feb 2018	7	• Updated Table E-1, list of food service facilities in Lathrop and added Figure E-1, location of food service facilities in Lathrop. • Removed FOG program sample forms from Appendix E as they are attached in the FOG ERP in Appendix B. • Added a FOG disposal plan discussion in Section 7.3. • Added information on FOG program education conducted during inspection and enforcement.	G. Gibson
Feb 2018	8	• Updated Element 8 to reflect findings from the City's recent (2018) Wastewater System Master Plan update and included additional tables and figures in Appendix F.	G. Gibson
Feb 2018	9	• Updated SSMP monitoring parameters and the monitoring template in Appendix G.	G. Gibson
Feb 2018	10	• Added a template SSMP program audit form in Appendix H.	G. Gibson
Jun 2016	26	• Updated staff contact information and organization chart in Appendix A.	G. Gibson
Jun 2016	62	• Updated SSO contact information.	G. Gibson

Date	SSMP Element /Section	Description of Change/Revision Made	Authorized By:
Jun 2013	26	• Updated staff contact information and organization chart in Appendix A.	G. Gibson

APPENDIX H – Element 10 (Internal Program Audits) Supporting Documents

1. Blank SSMP Program Audit Form
2. Completed SSMP Program Audits

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City of Lathrop
Sewer System Management Plan Audit Report
_____ through _____

Date:
Prepared by:
Reviewed by:

The purpose of the SSMP Audit is to evaluate the effectiveness of the City of Lathrop's (City's) SSMP and to identify any need for improvement.

Directions: Please check YES or NO for each question. If No is answered to any question, describe the updates/changes and the timeline to complete those changes.

INTRODUCTION		
A.	Is the current system description complete and up-to-date? Are infrastructure statistics current and complete?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 1 – GOALS		
A.	Are the goals stated in the SSMP still appropriate and current?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 2 – ORGANIZATION		
A.	Is the Organization Chart in Figure A-1 of the SSMP current??	YES ☐ NO☐
B.	Are the position descriptions an accurate portrayal of staff responsibilities?	YES ☐ NO☐
C.	Is the chain of communication for reporting and responding to SSOs accurate and up-to-date?	YES ☐ NO☐
D.	Is the contact information in Table A-1 current?	YES ☐ NO☐
E.	Is the List of City Staff Responsible for SSMP in Table A-2 current?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 3 – LEGAL AUTHORITY		
Does the SSMP contain current references to the Lathrop Municipal Code documenting the City's legal authority to:		

A.	Prevent illicit discharges?	YES ☐ NO☐
B.	Require proper design and construction of sewers and connections?	YES ☐ NO☐
C.	Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the City?	YES ☐ NO☐
D.	Limit discharges of fats, oils, and grease?	YES ☐ NO☐
E.	Enforce any violation of its sewer ordinances?	YES ☐ NO☐
F.	Were any changes or modifications made in the past two years (this audit period) to City Sewer Ordinances, Regulations, or standards?	(discuss below)
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 4 – OPERATIONS AND MAINTENANCE		
Collection System Maps		
A.	Does the SSMP reference the current process and procedures for maintaining the City's sewer system maps?	YES ☐ NO☐
B.	Are the City's collection system maps complete, up-to-date, and sufficiently detailed?	YES ☐ NO☐
Preventative Maintenance		
C.	Does the SSMP describe current preventative maintenance activities and the system for prioritizing the cleaning of sewer lines?	YES ☐ NO☐
D.	Are the City's preventive maintenance activities sufficient and effective in reducing and preventing SSOs and blockages?	YES ☐ NO☐
Rehabilitation and Replacement Plan		
E.	Is there an ongoing condition assessment program sufficient to rank the condition of sewer pipes and schedule rehabilitation? Are the current components of this program documented in the SSMP?	YES ☐ NO☐
F.	Are scheduled inspections and the condition assessment system effective in identifying, prioritizing, and addressing deficiencies?	YES ☐ NO☐
G.	Does the rehabilitation and replacement plan include a capital improvement plan that addresses proper management and protection of the infrastructure assets? Does the plan include a time schedule for implementing the short and long-term plans plus a schedule for developing the funds needed for the capital improvement plan?	YES ☐ NO☐
Training		
H.	Does the SSMP document current training expectations and programs?	YES ☐ NO☐
I.	Do supervisors believe their staff are sufficiently trained?	YES ☐ NO☐
J.	Are the training records current?	YES ☐ NO☐
Equipment and Replacement Part Inventories		

K.	Does the SSMP list the major equipment currently used in the operation and maintenance of the collection system?	YES ☐ NO☐
L.	Are contingency equipment and replacement parts sufficient to respond to emergencies and properly conduct regular maintenance?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 5 – DESIGN AND PERFORMANCE PROVISIONS		
A.	Does the SSMP reference current design and construction standards for the installation of new sanitary sewer systems, pump stations and other appurtenances and for the rehabilitation and repair of existing sanitary sewer systems?	YES ☐ NO☐
B.	Does the SSMP document current procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and the rehabilitation and repair of existing sewer lines?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 6 – SPILL EMERGENCY RESPOSNE PLAN		
A.	Does the City's Spill Emergency Response Plan (SERP) contain proper notification procedures so that the primary responders and regulatory agencies are informed of all sanitary sewer overflows (SSOs) as required by the WDR and MRP?	YES ☐ NO☐
B.	Does the OERP have a program to ensure an appropriate response to all overflows?	YES ☐ NO☐
C.	Does the OERP contain procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities of all SSOs that potentially affect public health or reach waters of the State in accordance with the MRP? Does the SSMP identify the officials who will receive immediate notification of such SSOs?	YES ☐ NO☐
D.	Are staff and contractor personnel aware of and appropriately trained on the procedures of the OERP?	YES ☐ NO☐
E.	Does the OERP contain procedures to address emergency operations such as traffic and crowd control and other necessary response activities?	YES ☐ NO☐
F.	Does the OERP ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge?	YES ☐ NO☐

G.	Considering SSO performance data, is the OERP effective in handling SSOs in order to safeguard public health and the environment?	YES ☐ NO☐
H.	Is the Water Quality Monitoring Plan current and has it been trained on and practiced by staff that would be involved in a SSO of large volume?	YES ☐ NO☐
I.	If applicable, was sampling performed within 48 hours for all SSOs greater than 50,000 gallons and was a Technical Report prepared and filed on the CIWQS website?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 7 – FATS, OILS, AND GREASE (FOG) CONTROL PROGRAM		
A.	Does the FOG Control Program include a description of public education outreach efforts that promote proper handling and disposal of FOG?	YES ☐ NO☐
B.	Does the FOG program include a plan for the disposal of FOG generated within the sewer system service area?	YES ☐ NO☐
C.	Does the City have sufficient legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG?	YES ☐ NO☐
D.	Are there requirements to install grease removal devices (such as traps or interceptors), best management practices (BMP) requirements, record keeping, maintenance requirements and reporting requirements established in the City's FOG Control Program?	YES ☐ NO☐
E.	Does the City have authority to inspect grease producing facilities and have sufficient staff to inspect and enforce the FOG ordinance?	YES ☐ NO☐
F.	Does the FOG control program identify sections of the collection system subject to FOG blockages, establish a cleaning schedule and address source control measures to minimize these blockages?	YES ☐ NO☐
G.	Does the FOG control program implement source control measures for all sources of FOG discharged to the collection system?	YES ☐ NO☐
H.	Is the current FOG program effective in minimizing blockages of sewer lines resulting from discharges of FOG to the system?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 8 – SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN		
A.	Does the System Evaluation and Capacity Assurance Plan evaluate hydraulic deficiencies in the system and provide estimates of peak	YES ☐ NO☐

	flows associated with conditions similar to those causing overflow events, if applicable?	
B.	Does the City take steps needed to establish a short and long-term CIP to address hydraulic deficiencies, including prioritization, alternatives analysis, and schedules? Are repair and replacement projects developed based upon condition assessment and/or field maintenance results?	YES ☐ NO☐
C.	Does the City's capital improvement program (CIP) establish a schedule of approximate completion dates for both short-term and long-term improvements and is the schedule reviewed and updated to reflect current budgetary capabilities and activity accomplishment?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 9 – MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS		
A.	Does the City maintain relevant information that can be used to establish and prioritize appropriate SSMP activities?	YES ☐ NO☐
B.	Does the SSMP identify and illustrate SSO trends, including frequency, location and volume of SSOs?	YES ☐ NO☐
C.	Is the City able to sufficiently evaluate the effectiveness of the SSMP elements based on relevant information?	YES ☐ NO☐
D.	Does the City update program elements, as appropriate, based upon monitoring or performance evaluations?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 10 – SSMP PROGRAM AUDITS		
A.	Does the audit focus on the effectiveness of the SSMP?	YES ☐ NO☐
B.	Was the SSMP Audit completed, reviewed, and filed as an Appendix to the SSMP on a biennial basis?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		
ELEMENT 11 – COMMUNICATION PROGRAM		
A.	Does the City communicate on a regular basis with the public and other agencies about the development and implementation of the SSMP? Does the communication system provide the public the opportunity to provide input as the program is developed and implemented?	YES ☐ NO☐

Discussion/Deficiencies/Corrective Actions:		
CHANGE LOG		
A.	Is the SSMP Change Log current and up-to-date?	YES ☐ NO☐
Discussion/Deficiencies/Corrective Actions:		

APPENDIX I – Element 11 (Communication Program) Supporting Documents

1. Copy of Public Notifications Posted on City's Website

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Public Notification
Sewer System Management Plan, 2025 Update

The State Water Resources Control Board has issued Order No. 2022-0103 known as "Statewide WDR (*Waste Discharge Requirements*) General Order For Sanitary Sewer Systems". The order requires the City to develop and implement a system-specific Sewer System Management Plan (SSMP) to facilitate proper funding and management of sanitary sewer systems. One of the requirements of the SSMP is that the City shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP.

The City of Lathrop is reviewing its existing SSMP and considering revisions to the document. The City plans to complete the update and recertify the SSMP in July 2025. A draft 2025 update to the SSMP is available for public review and comment on the City's website at the following address:

Public Review Documents | City of Lathrop CA
https://www.ci.lathrop.ca.us/com-dev/page/public-review-documents

Please provide any questions or comments regarding you may have regarding the City's SSMP update to:

Jonah Sonner
Compliance Engineer
City of Lathrop Public Works Dept.
390 Towne Centre Drive
Lathrop, CA 95530

(209) 941-7430 office
(209) 941-7443 direct
(209) 941-7449 fax

e-mail: jsonner@ci.lathrop.ca.us