
Central Valley Regional Water Quality Control Board

8 November 2012

Ken Payne
Director of Utilities
City of Folsom, Utilities Department
50 Natoma Street
Folsom, CA 95630

COMPLIANCE EVALUATION AUDIT, CITY OF FOLSOM COLLECTION SYSTEM, SACRAMENTO COUNTY

The Central Valley Regional Water Board (Regional Water Board) and the State Water Resources Control Board's Office of Enforcement (OE) has recently completed a compliance evaluation to determine the City of Folsom's (Discharger) compliance with Water Quality Order No. 2006-0003-DWQ (Sanitary Sewer System Waste Discharge Requirements or "SSSWDRs") which regulates the operations, maintenance and management of sanitary sewer collection systems. The purpose of this letter is to follow up on the violations and areas of concern discussed with you during the 3-4 October 2012 unannounced visit to the City of Folsom.

The SSSWDRs require all public agencies that own or operate a sanitary sewer system comprised of more than one mile of pipes that convey wastewater to a publicly owned treatment facility to apply to the State Water Board for coverage under this Order. Applicable public agencies are required to file a Notice of Intent (NOI) to comply with the terms of the SSSWDRs for each individual sanitary sewer collection system owned or operated by the public agency. The deadline for enrollment was 2 November 2006. Our records indicate that the City of Folsom filed an NOI with the State Water Board on 2 March 2007 and enrolled the "City of Folsom Utilities Department", which was then issued Waste Discharge ID (WDID) #5SSO10893.

Review of documents

The Discharger completed and submitted the *Sewer System Collection System Pre-Inspection Questionnaire* (Questionnaire) along with all supplemental information requested to demonstrate compliance with the SSSWDRs. The review of the Questionnaire and supplemental documents was found complete and accurate. Discrepancies with certain sections of the Questionnaire were discussed and cleared with the Discharger during the inspection. The collection system is operated with accurate representations of various sections of the Discharger's Sewer System Management Plan (SSMP).

Inspection

Water Board staff's inspection found that the collection system is in good operational condition. The assets that were inspected were found to be in good condition with minimal obstructions. The Young Wo pump station was observed to be adequately maintained. Pump Station #2 was observed to have substantial build-up of solids in the wet well. Both pump stations contained

proper safety equipment, backup generators, and exercise of the submersible pumps. Flows in the manholes were observed to be flowing at or below the spring line in the sewer lines. Records are adequately kept at the Corporation Yard and were provided in a timely manner. Field staff proved to be highly knowledgeable about the collection system and its components. The Discharger continuously provides quality training to field staff when needed.

Violations and Areas of Concern

The following violations listed in the table below were found by Board staff during the collection system inspection. In addition, the table below contains several areas of concern that the Discharger should address.

FINDING	RELATED CITATION(S)	COMMENTS
SANITARY SEWER COLLECTION SYSTEM:		
<u>Violation:</u> <i>The City is deficient in preventative maintenance relating to fats, oils, and grease (FOG) control for commercial and residential assets</i>	SSSWDRs, section D.13(vii)	The City indicated it has inspected several commercial buildings for FOG issues and will be hiring/training staff to conduct more of these inspections. The City should also incorporate public outreach programs to commercial and residential occupants to express the concerns of FOG in the collection system. .
<u>Violation:</u> <i>The City is not sufficiently maintaining Pump Station #2.</i>	SSSWDRs, section D.13(vii)	Significant solids were noted in the wet well during the inspection.
<u>Area of Concern:</u> <i>The City was unclear on who had ownership of the Folsom Prison line and who is responsible for operations, maintenance, and management of each segment of this sewer line.</i>	N/A	The City currently maintains several segments of the Folsom Prison line. The City and Folsom Prison should clearly establish the ownership and responsibility for the 20 inch line that begins at the prison and ends at the Greenback Lane manhole just south of the American River.

FINDING	RELATED CITATION(S)	COMMENTS
<i>Area of Concern: The City is deficient in maintaining manhole covers throughout the collection system</i>	N/A	During the inspection, some of the manhole covers seemed to be fairly corroded when the lid was opened. Corrosion could be seen around the manhole rim and at times the covers where difficult to remove. The City should provide additional preventative maintenance for the manhole covers.
SANITARY SEWER OVERFLOW REPORTING:		
<i>Area of Concern: Field data collection and record keeping practices for SSOs reaching the municipal storm drain system are inadequate.</i>	N/A	Water Board staff noted discrepancies in the estimated spill volumes and recovered spill volumes between field data sheets and CIWQS data entries. Field data collection and quality assurance procedures should be improved to ensure accuracy of data regarding the SSO volume discharged and recovered from the municipal storm drain system.
<i>Area of Concern: The City can improve scripts to get all the information possible for when the public reports spills.</i>	N/A	The City can ask additional questions when the public calls to report a sewage spill. Such information can include: When was the spill first noticed? How much of the spill is coming out? How big is the impact seen? Is the spill reaching a waterway or storm drain inlet?

By **15 December 2012**, please submit a technical report responding to each of the concerns or violations identified above. The report shall include photographs showing that the wet well in Pump Station #2 has been cleaned.

Citizen Concerns

In addition, the compliance inspection was conducted to address concerns from a resident of Folsom. Below are several concerns from the citizen along with responses to these concerns after the compliance inspection:

Concern 1: The City of Folsom does not have a City Engineer. Response: The SSSWDR does not require the enrollee to have a City Engineer. In addition, Board staff not that a number of City staff that are responsible for compliance with the SSSWDRs are California Registered Engineers.

Concern 2: The 20 inch Folsom Prison line connects to a 21 inch line, along with several city lines of 15 to 18 inch, but does not appear to have a direct connection to the 27 inch line. Response: Flow from the Folsom Prison line goes through two 18 inch, five 20 inch, six 21 inch, and three 27 inch gravity lines before reaching the 27 inch interceptor. Based on flow observations during the inspection, Board staff determined that there is adequate capacity for sewage flow. The Discharger is currently working on a capacity modeling report for its collection

system in dry and wet weather conditions. Board staff will review and provide comments to the Discharger upon receiving the capacity modeling report.

Concern 3: How does the north city sewage get to the 27 inch interceptor? *Response:* North city sewage travels south on the Folsom Blvd bridge in an 18 inch gravity line that ultimately reaches Pump Station #2. From the pump station, a 14 inch force main connects to a 27 inch gravity line that ultimately connects to the 27 inch interceptor. Based on flow observations during the inspection, Board staff determined that there is adequate capacity for sewage flow. The Discharger is currently working on a capacity modeling report for its collection system in dry and wet weather conditions. Board staff will review and provide comments to the Discharger upon receiving the capacity modeling report.

Concern 4: What is the size of the pipe in Folsom Blvd. which is directly north of the 27 inch line and apparently connected to it? *Response:* 6 inch gravity lines are connected from the West side of Folsom Blvd from residential homes. 27 inch gravity lines are connected from the East side of Folsom Blvd and connected from the confluence of the 14 inch force main and the Folsom Prison line. Based on flow observations during the inspection, Board staff determined that there is adequate capacity for sewage flow. The Discharger is currently working on a capacity modeling report for its collection system in dry and wet weather conditions. Board staff will review and provide comments to the Discharger upon receiving the capacity modeling report.

Concern 5: How can the Young Wo pump station accommodate sewage from the Folsom Corporation Yard with its hundreds of truck, washing facilities, scores of employees, and the commercial usage of up to 1,000 occupants from the Folsom Veterans Hall? *Response:* City officials indicated that 50 employees are in the corporation yard at various department trailers. There are seven can pump station in the corporation yard that distribute sewage to both the Young Wo pump station and Pump Station #2 near Folsom Blvd. The wash truck area is at the north end of the yard, where two can stations take the flow to Pump Station #2. Five can stations are located on the south end of the yard that takes flow to the Young Wo pump station.

A 6 inch gravity line takes sewage from the Folsom Veterans Hall to the Young Wo pump station. In speaking with the hall representatives, the maximum capacity for the hall is 74 occupants dining and 150 occupants in assembly. The representative stated that the maximum number of occupants in the hall was a couple hundred at one time for a memorial. Based on observations of the wet well at the Young Wo pump station, Board staff determined that there is adequate capacity in the wet well for sewage from the corporation yard and the Folsom Veterans Hall. Appropriate high level alarms and back up alarms are present in the wet well for high sewage flows. The Discharger is currently working on a capacity modeling report for its collection system in dry and wet weather conditions. Board staff will review and provide comments to the Discharger upon receiving the capacity modeling report.

Concern 6: There are odors from the Young Wo pump station. *Response:* As Board and City staff walked to the pump station, there were no signs of foul odors around the surrounding area. It was only until the wet well was open that an odor was observed near the open well. The City has an odor control system for the Young Wo pump station with a smell of bubble gum.

We look forward to receiving the capacity modeling report by **30 November 2012**. If you have any questions regarding the audit or this report, please contact Lucio Orellana at (916) 464-4660 or by e-mail at lorellana@waterboards.ca.gov.

-Original signed by -

WENDY WYELS, Supervisor
Compliance and Enforcement Section

Attachments:

- Photos from Inspection
- Pre-Inspection Questionnaire from Discharger
- SSO Public Report as of 22 October 2012
- SSO Questionnaire from CIWQS

cc w/ attachments: Jim Fischer, OE-SIU, State Water Board
Julie Berrey, OE-SIU, State Water Board
Laurie Laurant, Folsom