Section I
Sewer Overflow Action Plan
Unauthorized Discharge
Tracking and Reporting Plan

CONSENT DECREE SECTIONS XIII, XIV, PARAGRAPHS 28, 32, 62a SEWER OVERFLOW ACTION PLAN UNAUTHORIZED DISCHARGE TRACKING AND REPORTING PLAN

Paragraph 62 a: Requires the Board's annual report to include information on Sewer Overflow Action Plan (SOAP) activities (Consent Decree Exhibit 4). These SOAP activities include, but are not limited to

- the number of responses to unauthorized discharges,
- the response times for each discharge, and
- actions taken to clean up and disinfect the discharge site.

<u>2008 Work Accomplished:</u>

- In 2008, from January 1 through December 31, there were a total of 163 unauthorized discharges from the gravity system mains, sewer force mains and sewer pumping stations. The Board complied with the 24-hour response time goal set out in the Sewer Overflow Action Plan, as modified by the *force majeure* relief, for all of these discharges.

Paragraph 28: Requires the Board to comply with the Sewer Overflow Action Plan in accordance with its procedures.

Paragraph 32: Requires the Board to comply with the Unauthorized Discharge Tracking and Reporting Plan in accordance with the schedule and procedures specified therein.

- Because Paragraphs 28 and 32 are closely related, and information in the various appendix reports often overlaps between activities related to the Sewer Overflow Action Plan and the Unauthorized Discharge Tracking and Reporting Plan, this "Work Accomplished" section contains information on both plans.

  <u>2008 Work Accomplished:</u>

- Appendix Tab 1 contains a report of the Board's 2008 SOAP activities with respect to unauthorized discharges from the gravity system mains, sewer manholes, sewer force mains, and sewer pump stations. These tables set out the street address, the date and time of the service request, the date and time the crew arrived at the discharge site, the response time and response goal, and whether the response goal was met. Response times exceeding the response goals are identified with an "N" in the Met Response Time Goal column. The report covers January 1 through December 31, 2008.

- In 2008, from January 1 through December 31, there were a total of 163 unauthorized discharges from the gravity system mains, sewer force mains and sewer pumping stations. The Board complied with the time goal set out in the Sewer Overflow Action Plan, modified by the *force majeure* relief, for all of these discharges.

- Appendix Tab 2 contains the "Key to Measures Taken in Response to Unauthorized Discharges". The Board uses codes from the key to identify control measures taken. These codes permit the Board to accurately document field activities pertaining to the clean up and disinfect ion of discharge sites.

- The Sewerage and Water Board has complied with Sewer Overflow Action Plan and the Unauthorized Discharge Tracking and Reporting Plan since entry into the Consent Decree.

- <u>Gravity System Unauthorized Discharges</u>:
  <u>2008:</u>
  - With respect to unauthorized discharges from the gravity system, the Board met all of its response time goals for 2008. See Appendix Tab 1.

  - The Board complied with the 24-hour response time goal set out in the Sewer Overflow Action Plan, as modified by the *force majeure* relief, for all of these discharges.

- S<u>ewer Force Main Unauthorized Discharges</u>:
  <u>2008:</u>
  - With respect to unauthorized discharges from the sewer force main system, the Board met all of its response time goals for 2008. See Appendix Tab 1.

  - The Board complied with the 24-hour response time goal set out in the Sewer Overflow Action Plan, as modified by the *force majeure* relief, for all of these discharges.

- Pump Station Unauthorized Discharges:
  2008:
  - With respect to unauthorized discharges from sewer pump stations, the Board met all of its response time goals for 2008. See Appendix Tab 1.
  - The Board complied with the 24-hour response time goal set out in the Sewer Overflow Action Plan, as modified by the *force majeure* relief, for all of these discharges.

- Most of the unauthorized discharges experienced by the Board from the gravity system are caused by a choke in the line. The Board's primary goal in response to sanitary sewer overflows is to resolve the cause of the choke as quickly as possible and mitigate any effect of the overflow. In this regard, it is the customary practice of the Board to have a team at the problem site within the established response time goal of the SOAP to correct and remove the cause. The field team then determines whether any sewage can be recovered from the storm drainage system. In many cases this is not feasible because the sewage has run off via a subterranean canal system and has co-mingled with the groundwater flow in the system.

  The Board's ability to capture and reintroduce sewage to the proper system is usually specific to areas in New Orleans East and any area of the city with open drainage canals. Also, unless the cause of the problem is a broken pipe or some other situation that will dictate less than immediate resolution, it is not usually possible to collect the spilled sewage. The field team will always clean up any solid debris and flush the area of the overflow before leaving for the next job.

  The Board is continuing its public education campaign with residents, restaurants, hotels and other commercial establishments in the City of New Orleans regarding how to properly dispose of kitchen grease and other debris to prevent clogging the sanitary sewerage system and causing overflows. This program also includes a one-on-one educational session with violators and suspected illegal dischargers. The Sewerage and Water Board provides a copy of the Water Environment Federation's informational brochure, **Fat Free Sewers**, to restaurants, hotels, and other establishments that have the potential to discharge grease into the sewerage collection system. A warning letter is issued to potential problem locations. A violation letter and monetary penalty is issued where proof of a violation is found. Fines are issued using the approved Enforcement Response Plan as a guide to allow escalation of penalties until problems are resolved.