

Spill and Transboundary Flow Event Prevention and Response Plan

**United States International Boundary and Water Commission
International Wastewater Treatment Plant**



Prepared by:

Veolia

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INTRODUCTION

1. The South Bay International Wastewater Treatment Plant ("SBIWTP") is a 25-million gallon per day (MGD) secondary treatment plant that treats wastewater collected within the City of Tijuana, Mexico ("City") and discharges the treated wastewater to the Pacific Ocean through the South Bay Ocean Outfall. The sewer collection system, located in Mexico, is maintained by the Comisión Estatal de Servicios Públicos de Tijuana (CESPT) in the City of Tijuana. Wastewater collected within Tijuana is received by Sewer Pump Stations #1A B, located within the City. By US/Mexico treaty conditions, a 30 day average of 25 MGD is sent to the SBIWTP, with the remainder being conveyed by Pump Station 1A and 1B to San Antonio de los Buenos, located approximately six (6) Miles south of the US/Mexico border. Conveyance is through a force main and gravity pipeline.
2. Surface releases of wastewater within Mexico are considered potential sources for contamination of waterways and land areas within the United States. By design, canyon collector structures were erected on the United States side of the US/Mexico border to capture low volume flows in dry weather. Canyon collectors are referred to by name as Stewart's Drain, Silva Drain, Canyon Del Sol, Smuggler's Gulch Collector, and Goat Canyon Collector. Pump stations in Mexico that directly affect the US collectors are listed in Attachment A.
3. Per California Regional Water Quality Control Board – San Diego Region, Order No. R9-2021-0001, NPDES Permit No. CA0108928, Section 6.3.2.1.2, this Spill and Transboundary Flow Event Prevention and Response Plan is required as a comprehensive approach to prevent transboundary spills into the environment on the US side of the border – and Mexico.

This Spill and Transboundary Flow Event Prevention and Response Plan is specifically focused on those flows that are **NOT CAPTURED** by the collection system for treatment at either the Mexico or IBWC treatment facilities.

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GOALS

The goal of the Prevention/Response plan is to:

1. Reduce, eliminate and prevent the recurrence of Spill and Transboundary Flow Events.
2. Protect public health and safety.
3. Prevent adverse impacts to the environment from Spill and Transboundary Flow Events, including but not limited to, adverse impact to waters of the United States and/or State of California.

DESIRED OUTCOMES

The Prevention/Response Plan have the desired outcomes :

1. Prompt notification and reporting of Spill and Transboundary Flow Events to appropriate regulatory agencies, municipalities, and other potentially affected entities.
2. Effective measures are identified, documented and implemented to prevent, reduce, and eliminate Spill and Transboundary Flow Events.
3. Effective remedial measures are implemented so that IBWC can aid to 1) Control or limit Spill and Transboundary Flow Event volume, 2) Terminate Spill and Transboundary Flow Events, and 3) Recover as much of Spill and Transboundary Flow Events volume as possible for proper disposal, including any wash down water; and
4. A framework for bi-national actions and cooperation in achieving the goals and desired outcomes of the Flow Prevention/Response Plan established and followed by the Owner, CILA, and the following agencies to the extent that these agencies are willing and able to participate, Secretaría de Protección as Ambiente (SPA), Comisión Estatal de Servicios Públicos, de Tijuana (CESPT), Procuraduría Federal de Protección al Ambiente (PROFEPA), Comisión Nacional del Agua (CONAGUA), and the City of Tijuana's Secretaría de Desarrollo Urbano y Ecología (SDUE), and NGOs.

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DEFINITIONS

Discharger. The Discharger as it pertains to the Permit is the Owner of the South Bay International Wastewater Treatment Plant, which is the International Boundary and Water Commission, United States and Mexico, United States Section (USIBWC). However, there are several functional roles within the Permit, which the Operator of the facility, owner's designee, has the responsibility to complete via contract. The Operator is Veolia Water North America. This plan will distinguish the individual responsibilities.

Canyon Collector and Drain. A canyon collector is effectively identical to a Drain. It is a concrete structure designed to detain the low-volume, dry-weather flow from surface runoff and spilled wastewater flows in Mexico and redirects it to an intake and through a gravity flow pipeline to the SBIWTP or through a pipeline conveying flow to a pumping station which transmits the flow through a force main to the headworks of the SBIWTP.

International Boundary and Water Commission ("IBWC"). IBWC is an international organization comprised of a Mexican section and a United States section (the USIBWC).

San Antonio de los Buenos Waste Water Treatment Plant (SABWWTP). The wastewater treatment plant located in Tijuana, Mexico.

Sanitary System Overflow (SSO). Sanitary system overflow, is an overflow from within the collection system within Mexico.

South Bay International Wastewater Treatment Plant. The South Bay International Wastewater Treatment Plant ("SBIWTP" or "Facility") is a secondary wastewater treatment facility with a design average flow of 25 million gallons per day (MGD), which treats wastewater collected within the City of Tijuana, Mexico ("Tijuana").

Spill from the Facilities (Spill Event). A discharge of treated or untreated wastewater or other material to the environment that occurs from the Owner's Facility, including, but not limited to, the entire wastewater conveyance, storage, treatment, and disposal system (wastewater system) that is owned by the USIBWC. Wastewater facilities include all piping, pump stations, force mains, Junction Box 1, Junction Box 2, the International Wastewater Treatment Plant, South Bay Land Outfall, and South Bay Ocean Outfall. Note that the land and ocean outfalls have a shared ownership with the City of San Diego.

Transboundary Flow. The flows entering the storm drains and collectors that eventually enter the US, may be the result of:

- a. An SSO from the sewer collection system in Tijuana,
- b. Pump station shutdown from loss of power or scheduled maintenance
- c. A broken drinking water main from within Tijuana,
- d. A storm event, or
- e. An unknown source

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The SBIWTP is notified of a possible transboundary flow if anticipated and known. Otherwise, the SBIWTP is not notified of a spill or overflow occurring within Tijuana and The flows received at the drains and collectors are discovered during routine plant operations and inspections.

Please Note: Wet weather as defined by the permit, is not covered by this plan. When a rain event is imminent, the canyon collectors are shut off and resume operation when the rain event is over.

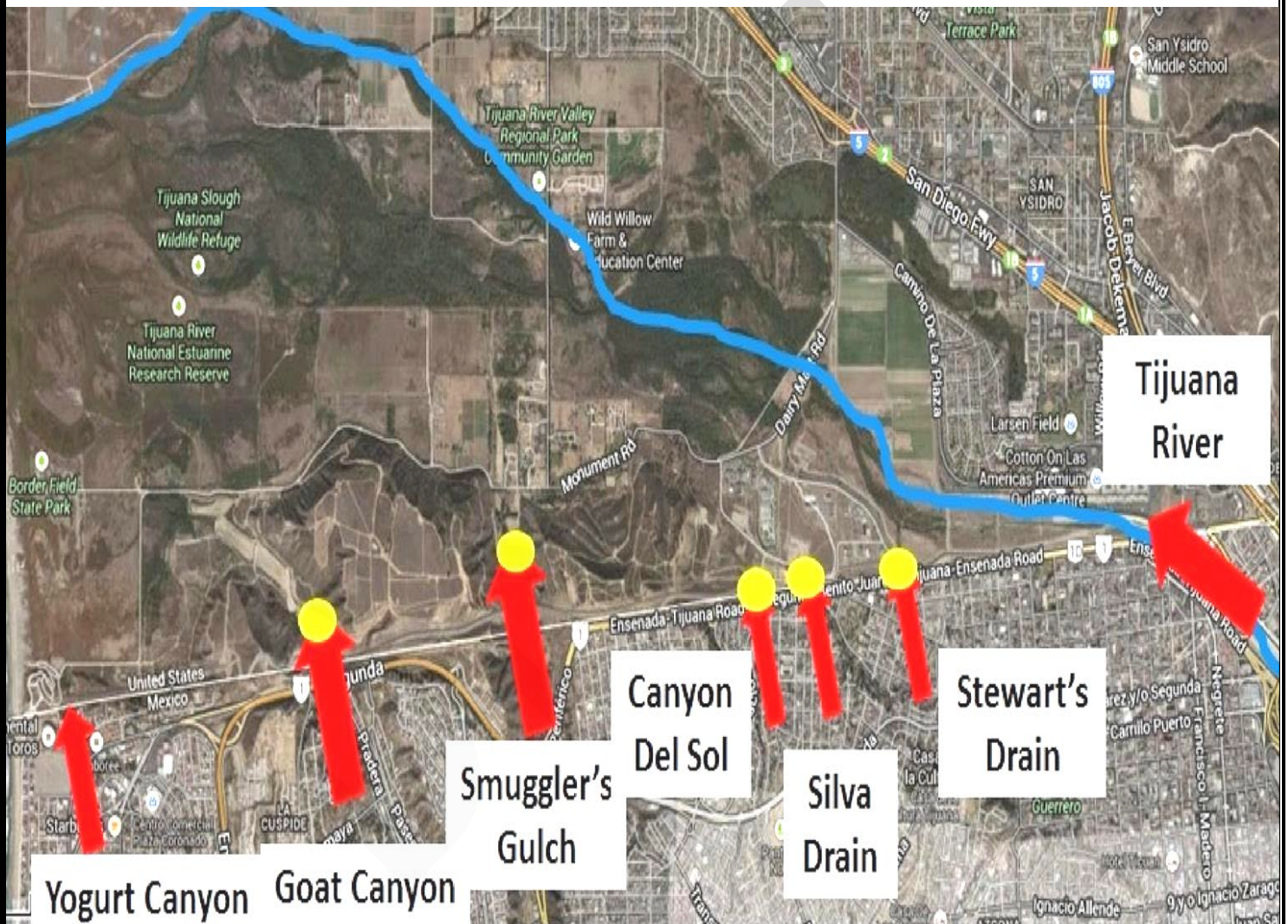
Canyon Collector Transboundary Flow Event. A Canyon Collector Transboundary Flow Event is any flow across the U.S./Mexico international border under dry or wet weather conditions to any one of the five canyons equipped with a canyon collector system, including Stewart's Drain, Silva Drain, Canyon Del Sol, Smuggler's Gulch Collector, or Goat Canyon Collector, that is not captured by the canyon collector system for treatment at the SBIWTP and disposal through the SBOO. A dry weather Canyon Collector Transboundary Flow Event also constitutes a Spill Event when transboundary flows less than or equal to the canyon collector's maximum design capacity is not captured by the canyon collector for treatment at the SBWITP and disposal through the SBOO.

Other Canyon Transboundary Flow Event. An Other Canyon Transboundary Flow Event is any flow across the U.S./Mexico international border, under dry or wet weather conditions, at any transboundary canyon in the Tijuana River Valley that is not equipped with a canyon collector system, including but not limited to Yogurt Canyon.

Tijuana River Transboundary Flow Event. A Tijuana River Transboundary Flow Event is any flow across the U.S./Mexico international border, under dry or wet weather conditions, in the Tijuana River.

Additional definitions. Additional definitions can be found within *Attachment A – Abbreviation and Definitions of the California Regional Water Quality Control Board – San Diego Region*, Order No. R9-2021-0001, NPDES Permit No. CA0108928.

AREA PHOTOGRAPH



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ROLES and RESPONSIBILITIES

1. The roles and responsibilities are clearly defined. The duly authorized individuals and/or positions having overall responsibility for the development and implementation of the Prevention/ Response Plan are listed within *Attachment C* of this Plan. The names of all key individuals, associated position titles, email addresses and telephone numbers, including management, administrative, contractor and maintenance positions, responsible for implementing specific measures and lines of authority described in the Prevention/ Response Plan are showed in *Attachment C* of this Plan.

2. The roles and responsibilities and lines of authority for the implementation of the Prevention/Response Plan with respect to CILA, SPA, CESPT, PROFEPA, CONAGUA, and SDUE, including organization chart(s) or similar document(s), to the extent that they are available, are attached in *Attachment C* of this plan

RESPONSE PLAN

1. Spills from the Facilities (Spill Event) and Transboundary Wastewater Flow Past the Canyon Collector System (Canyon Collector Transboundary Flow Event). The Owner has an established Facility Spill and Transboundary Flow Event Response and Prevention Plan. This Plan is intended to provide appropriate documented procedure for responding to a facility spill or transboundary flow event from the Collection System and the SBIWTP. The standard procedure is periodically updated and the most current version is stored in the Standard Operating Procedure binders within the Operator's control room. As of the writing this Plan, the most current procedure was written on October 6, 2021 and is listed below.

Procedure - Brief Description:

Notification: Whether the overflow is within the treatment plant or at one of the drains, collectors, pump stations, along a gravity pipeline, or force main, it is likely the person making the discovery of the overflow will be alone. Therefore, it is extremely important that the person making the discovery be capable of identifying the transboundary flow past the canyon collectors and notifies their immediate supervisor, or the operator in-charge at the treatment plant, of the overflow and its location. Notification is the first action that should be taken, regardless of the size, volume, cause, or corrective actions that could be taken. By communicating to other operators that a problem exists, additional support and aid can be sent to the scene. If an overflow event is not reported immediately and the operator decides to attempt to halt the overflow, the operator may become injured or incapacitated: and then the overflow may not only continue, but no-one else would know that the overflow is occurring; the aid and assistance would not be "on their way". In any emergency event, including a transboundary spill, the initial response should always be notification.

Containment: If the person discovering the transboundary flow has made their initial notification, and they believe it is safe for them to take further actions, they should make an attempt to contain the transboundary flow. For example, by ensuring the screens are kept cleared to allow flow to the facility for containment. Or to establish a means of preventing other people from entering the area of the overflow, or containing the flow.

Halting Overflow: If the operator is not exposed to a hazardous situation and the overflow can be halted by turning on and off a pump (opening or closing a valve or similar operator action); then the operator should take the appropriate action to halt the overflow.

Senior Operator/Manager Assume Control: Once assistance has arrived on the scene, the senior operator assumes responsibility and directs all further responses. For example, the response actions may include, but are not limited to; attempts to contain, to halting overflow by contacting Mexico and requesting remedial action and maintaining control of access to the scene, estimating volume of overflow and/or flow rate, collect samples when appropriate, obtain any other assistance and/or support as needed. Access restriction and hazard warnings should be posted to inform the general of public of the hazard.

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Once the overflow has stopped, the collector needs to be made operational within 2 days of cessation of flow. Sand and debris are to be removed within 7 days. Clean up outside the area of the collector is not included.

Reporting: The operator that takes control of the scene is responsible for the reporting of the overflow, unless senior management assumes the reporting responsibilities. The Transboundary Spill Reporting Plan will be followed and the appropriate verbal and written reports made as specified. A copy of the reporting procedure can be found in **Attachment B** and is available in the Operations Control Room at the SBIWTP.

Spills greater than 1000 gallons must be reported within 2 hours to the CAL OES and to USIBWC, who then request it to the stakeholders. First notification of a spill should be made to California Office of Emergency Services in Sacramento. Information **MUST** be phoned in to the Duty Officer at 800-852-7550 and all data requested should be provided

2. Other Canyon Transboundary Flow Event or Tijuana River Transboundary Flow Event.

IBWC has a well-established Transboundary Response Plan. The Transboundary Response Plan is intended to provide the IBWC, and its designees, appropriate procedures for responding to other Canyon Transboundary or Tijuana River Flow Events. **This section is included for completeness of the topic and is not relevant to the spill plan.**

The primary Flow Event will be a dry weather flow in the Tijuana River crossing the international boundary. Normally this is a result of an outage of the CILA Pump Station, which diverts dry weather flow out of the low flow channel of the Tijuana River just upstream of the international boundary. When the flow in the river exceeds two cubic meters per second (measured at the Tijuana River gauge operated by the USIBWC), the CILA Pump Station is not operational due to inaccessibility of screening, wet well sedimentation, and lack of flow capacity. The pump station is put back into operation when the flow drops below two cubic meters per second.

There may be flow at other locations along the border, such as at Yogurt Canyon. Mexico is immediately advised of the flow and requested to investigate and take measures to stop the flow.

Discharge of partially treated effluent from the SABWWTP sometimes affects water quality in the US if a south swell is predominating. Since this is an ongoing discharge it is not considered a spill flow event.

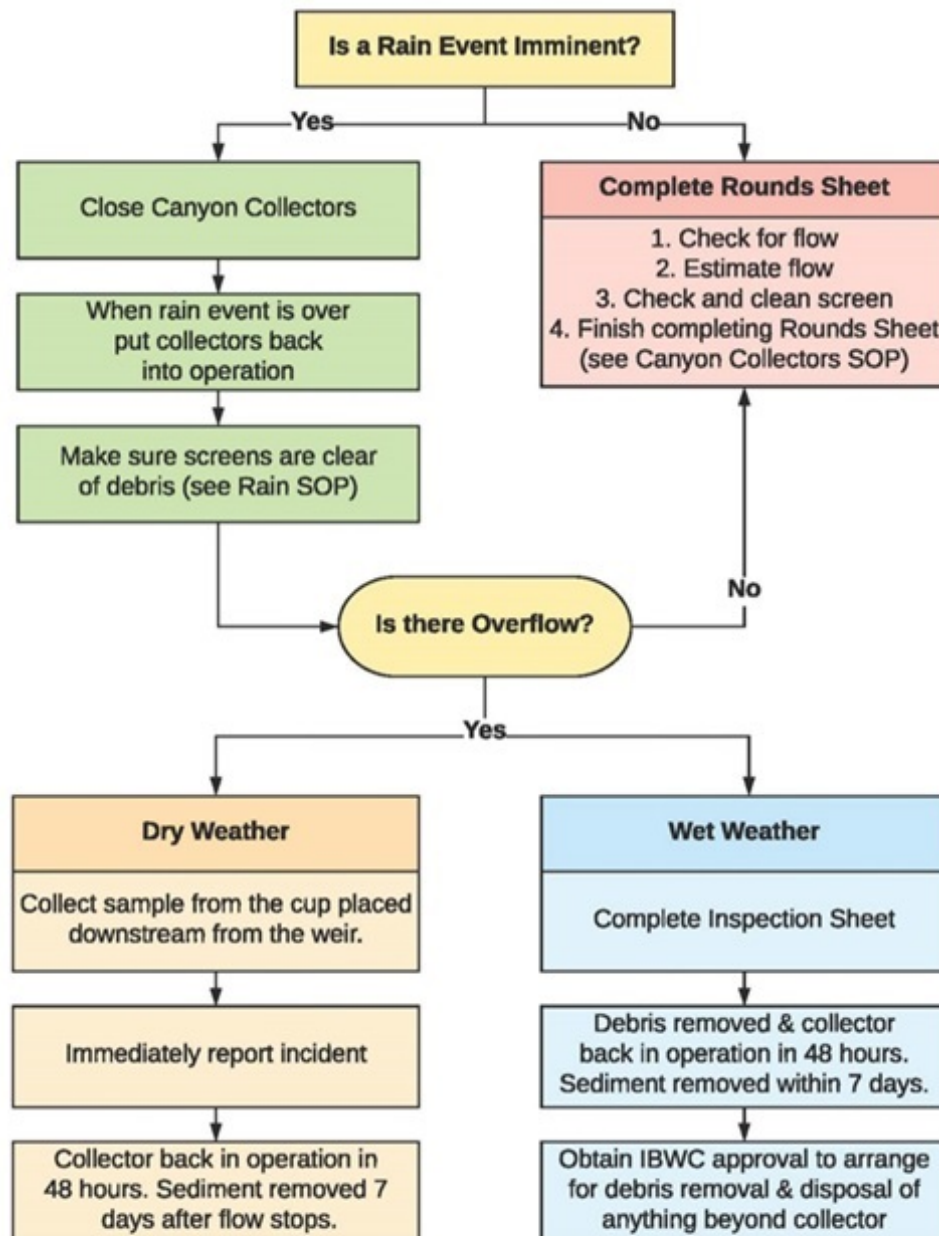
Outages at Caramo Playas and Playas Pump Station will be reported if Mexico advises that there is an interruption of service. Both of these pump stations have emergency diesel power generators and can handle power failure.

Notification: Notification procedure is within *Attachment B*.

Halting Overflow: Mexico will be advised of the overflow and will be asked to take appropriate action to halt flow.

Reporting: IBWC will be responsible for the reporting of the overflow and completing the reports.

IBWC Canyon Collectors Daily Inspection Rounds Sheet



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STANDARD OPERATING PROCEDURE
VEOLIA WATER NORTH AMERICA
South Bay International WTP

Canyon Collector Rounds

Date: October 11th, 2021

Revised:

Author: Veolia

Introduction and Purpose:

The IBWC South Bay International Wastewater Treatment Plant has a series of 5 Canyon Collectors. These collectors are designed to take a specific volume of Dry Weather Flow from Mexico. During rain events, the isolation valve at the Goat and Smuggler's Canyon collectors are shut to prevent storm water from entering. This is done because the sediment and debris carried by storm water can damage the SBIWTP infrastructure and facilities. The other three canyon collectors do not have isolation valves. The collectors are identified as follows:

USA	Mexico	Flow Destination
Stewarts Drain	Por El Puente	Gravity drain to JB-1
Silva Drain	Colonia Aleman	Gravity drain to JB-2
Canon Del Sol	Soler	Gravity drain to JB-2
Smugglers Gulch	Matadero	Gravity drain to Hollister Pump Station
Goat Canyon	Laureles	Gravity drain to Goat Canyon Pump Station (Note: Goat Canyon Pump Station discharges to the Hollister Pump Station via force main)
Hollister St Pump Station	Matadero	SBIWTP
Goat Canyon Pump Station	Laureles	SBIWTP via Hollister
Mexico	US Spill Location	Flow Destination
Pump Station CILA	Tijuana River/PB 1A-B	Mexico Pump Station 1A
Pump Station 1A/1B	Stewarts Drain	Conveyance Line to San Antonio de los Buenos WWTP (SADLB)
Matadero Pump Station	Smugglers Gulch CC	Conveyance Line to SADLB
Las Laureles II	Goat Canyon CC	Conveyance Line to SADLB
Las Laureles I	Goat Canyon CC	Conveyance Line to SADLB

Procedure:

DAILY/ ROUTINE INSPECTIONS:

CANYON COLLECTOR DAILY INSPECTION form using smartphone app MobileMMS.

Fill out the top section with your name, the date, and the weather condition at the time of inspection for each collector visited, complete the form for that specific collector as follows:

Time of Inspection: record the time you arrive to the collector; check either **AM** or **PM**

Is the Collector Operational? Check **YES** IF the entire collector is operational, which includes the area outside of the intake vault, the condition of the screen, and the interior of the vault. Check **NO** if the vault is sanded in, the screen is completely plugged, and then the area outside the collector is likely to be full of debris which prohibits the flow from entering the vault.

Are there any indications of sewage overflow in the last 24 hrs? Check **YES** if there are signs of overflow and record your observations in the REMARKS section. Overflow is when any flow leaves the collector site and travels down the pathway leading to the TJ River. Check **NO** if there are no obvious signs.

Is flow coming from Mexico **NOW**? Check **YES** if ANY flow is coming from Mexico; check **NO** if there is not. If **NO** is checked, then proceed to the "How much debris is on the collector" area.

If Yes, how much? To calculate the flow, do the following:

Pick an area that accounts for all of the flow and measure the width in feet. Check the floor of the area and count the lines to give an estimate of the area wetted. Use the width and the length over which the water is flowing.



Each yellow line is 1 foot apart and the red lines are 5 feet apart. The red lines will be numbered moving out from the center.

The depth in feet (each $\frac{1}{4}$ " = 0.021 ft.; each 1" = 0.083 ft.) and measure the velocity in feet per second (this can be accomplished with a radar gun or by timing a floatable object). Velocity instrument is being procured.

Now multiply and record the CFS result. Example:

- A flow of 2 feet per second that is 2 feet wide and $\sim \frac{1}{2}$ " deep
- $2\text{ft/s} \times 2\text{ft} \times .042\text{ft} = 0.168\text{ CFS}$ (multiply this by 1.547 MGD / CFS will give you gallons in MGD



Are Flows Being Contained? Check **YES** if ALL of the flow is being contained, with zero overflowing. Check **NO** if ANY of the flow is overflowing.

If No, How much is bypassing the Collector? To calculate this number, measure the amount of flow going over the overflow, the same way you calculated the flow from Mexico.

How much debris is on the screen to the collector? General Condition"

- None: the screen is clean and free of all debris
- Light: the screen has some debris on it, but does not restrict any flow
- Moderate: the screen has debris on it; should probably be cleaned soon
- Heavy: the screen must be cleaned immediately
- Completely covered or sanded in: remove the debris. If sanded in, so note it in the remarks.

Remarks: Use this area to notate any observations that are out of the norm. Items such as condition of the collector, water quality, excessive debris, sanded in, or anything else noteworthy would go in this section.

Photos: During each inspection of each collector, Operator will take photos of the collector and its intake and upload the photos using the MobileMMS smartphone app. The Owner can then access the daily canyon collector inspections via the MobileMMS website.

When inspecting each collector, take the time and open the hatches to the vaults and run a pole down the vault to check for sand build-up in the vault. There needs to be adequate space between the outlet

pipng and the level of sand to keep the collector operational. If excessive sand is discovered, put in a work order to have the vault cleaned out.

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EMERGENCY CONDITIONS:

Any time there is a rain event, or if we are taking on flow which is out of the norm, we must complete an inspection report for the affected collector. This will be in addition to the normal daily inspection rounds.

Example:

An operator makes the Collector Rounds at 08:00. At approx., 09:00, the inspection rounds have been completed. 13:00 we receive a call from Mexico stating that they are having a problem, and will be sending flow to Goat Canyon. The operator shall then take another CANYON COLLECTOR DAILY INSPECTION using the MobileMMS smartphone app to the Goat Canyon collector and record their findings.

If flows are occurring during dry weather conditions, the operator shall make hourly trips out to the collector and complete an inspection form for each visit. During each visit, the intake screen shall be cleaned to prevent any overflow. If high flows or high amounts of debris are being experienced, it may require a call out for additional assistance.

Please see the attached Wet Weather Operational SOP.

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STANDARD OPERATING PROCEDURE
VEOLIA WATER NORTH AMERICA

South Bay International WTP

**CANYON COLLECTOR PUMP STATION WET WEATHER STANDARD OPERATING
PROCEDURE (SOP)**

Date: October 11th, 2021

Revised:

Author: Veolia

At the end of the rain event, open the collector and put it back in service. Ensure the lift stations (Goat and Hollister lift station) are operational.

Canyon Collector Rounds - Preventative Maintenance and Inspections Procedures

Introduction and Purpose: The IBWC South Bay International Wastewater Treatment Plant includes five canyon collectors and intake structures which divert limited volumes of dry-weather surface runoff from Mexico to the treatment plant for treatment. These collectors are designed to take specific quantities of dry-weather flows from Mexico. The collectors are identified as follows:

USA	Mexico	Flow Destination
Stewarts Drain	Por El Puente	Gravity drain to JB-1
Silva Drain	Colonia Aleman	Gravity drain to JB-2
Canon Del Sol	Soler	Gravity drain to JB-2
Smugglers Gulch	Matadero	Gravity drain to Hollister Pump Station
Goat Canyon	Laureles	Gravity drain to Goat Canyon Pump Station (Note: Goat Canyon Pump Station discharges to the Hollister Pump Station via force main)

The Operator has a well-established procedure for inspection of the canyon collectors. The collector standard operating procedures are periodically reviewed and updated. The most current versions are provided for ready reference in the Operator's Administration Building Operations' Control Room. As of the writing of this Plan, the most current procedure was written on October 11, 2021 and is listed below. A complete document is stored within **Attachment E**. In addition, the Daily Inspection Log (which is completed with each inspection) is also attached within **Attachment E**.

Routine Preventative Maintenance:

Although the collectors have no moving parts, they require considerable maintenance. The runoff from Mexico which flows through the natural drainage channels leading to the canyon collectors can convey a significant volume of sand, trash, and debris. Runoff events can carry sufficient material to block collector/drain inlet structures. This sand and debris must be removed promptly. The interior chambers of the collectors must similarly be cleaned of sand and debris as needed. Under unusual circumstances, gravity pipelines have also been blocked by material. These structures are cleaned to remove any obstructions as soon as possible after a wet-weather event or after a routine inspection identifies possible obstructions. Cleaning activities are performed with

Operator's owned front-end loaders, backhoes, and vacuum trucks, or by hand tool. Facility staff includes a full time Heavy Equipment Operator responsible for these and other activities. Additional Operations and Maintenance staff provide supplementary support as needed.

Best Practice / Canyon Collector Transboundary Flow Event

Operational experience has shown that the existing canyon collectors' performance can be enhanced to further prevent dry weather spills using relatively simple procedures. These include:

Collector/Drain Primary Sandbag Placement

Each collector and drain was constructed with a 'ramp' for use in directing wet weather overflows to drainage areas. During dry weather the transition point between paved and non-Paved portions of this ramp can be sandbagged during dry weather (roughly April 30 through November 1) to further contain potential dry weather discharges.

Collector/Drain Secondary Sandbag Placement

In the event of significant dry weather spills, flow can discharge past the primary sandbags mentioned previously. Downstream drainage zones are typically unpaved and variable. Erection of a secondary sandbag barrier can further prevent widespread spill runoff. Placement of this secondary barrier is variable depending on the topography of each collector/drain's downstream area. Practical distance between Primary and Secondary barriers is as follows:

Drain/Collector	Distance between Primary and Secondary Barriers (Note: Distances are being established)
Stewart Drain	5 feet by 60 feet
Silva Drain	15 feet by 20 feet
Canon Del Sol	50 feet by 25 feet
Smugglers Gulch	50 feet by 76 feet
Goat Canyon	40 feet by 45 feet

Routine Inspections:

Daily inspections of each canyon collector are required. Each inspection is documented by completion of the daily inspection form for that specific collector using the MobileMMS smartphone app. These forms provide the following information:

- Time of Inspection:
- Is the collector/drain operational?
- Are there any indications of sewage overflow in the last 24 hours?
- Is there flow coming **currently** from Mexico?
- If Yes, How much?
- Are Flows Being Contained?
- If No, How much is bypassing the Collector?

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- How much debris is on the screen to the collector?(General Condition)
- Remarks: Use this area to notate any observations that are out of the norm. Items such as condition of the collector, water quality, excessive debris, sanded in, or anything else noteworthy would go in this section.
- Photos of the location

Completed forms are available on the MobileMMS smartphone app website. The information listed above for each of the five canyon collectors will be summarized and submitted with the monthly sDMR and eSMR reports in MS Excel format minus the photos.

Please note: Periodically, when inspecting each collector, run a pole down the vault to check for sand build-up in the vault. There needs to be adequate space between the outlet piping and the level of sand to keep the collector operational. If excessive sand is discovered, then a work order will be generated to clean the vault.

Dry-Weather Event Conditions:

Anytime there is a dry-weather overflow event and an overflow occurred, the operator will complete the Preliminary Notice of Facility Spill / Transboundary Flow Event International Boundary and Water Commission Form and the California Regional Water Quality Control Board – San Diego Region – Transboundary Flow Event Form. These reports will be sent to the IBWC and other agencies if relevant as per the Report Notification Procedure found within *Attachment B* using the proper name and contact information found within *Attachment C*.

During dry weather events, facility operators will make periodic inspections of the collector and complete an inspection form for each visit. During each visit, the intake screen shall be cleaned if such work can be performed safely to prevent an overflow. If high flows or high volumes of debris are being received, additional personnel may be required to optimize collector/drain system performance.

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REHABILITATION and REPLACEMENT

Condition assessment of all SBIWTP facilities is an integral component of facility performance assurance. This assessment is conducted and updated annually. Upcoming repairs and maintenance are highlighted in the annual report that is developed. The report provides a rolling 5- year projection of likely repair and maintenance work. Factors including equipment/system criticality, results of predictive maintenance analyses, etc. are utilized to provide a priority ranking for identified work. Once recommended repairs are reviewed, funding is pursued to perform the work. If funding limitations preclude performance of some repairs or improvements, then these projects will automatically be included in the following year's assessment.

TRAINING

The Operator ensures comprehensive response to Spill & Transboundary events through multi-level training. Initially, intensive new hire training and familiarization is performed followed by periodic refresher reviews to reinforce what has already been learned. Further details follow.

New Operations and Maintenance Staff

Upon commencement of employment, new operations and maintenance staff are trained on a wide variety of treatment processes and procedures. Included in this training is training specific to the operation of the facility's canyon collectors/drains and pump stations. A portion of this training includes:

Review of the following SOPs:

- Canyon Collector Rounds
- Spill & Transboundary Flow Event Reporting
- Spill & Transboundary Flow Event Prevention Inspection
- Canyon Collector Daily Inspection Form using the MobileMMS smartphone app
- Fork-Lift Training in the event it may be needed during an event
- On site review of canyon collector/drain and pump station locations, preferred operational methodology, and operational practices and procedures
- Proper completion of inspection logs
- Review of spill notification procedures Existing Staff

Although staff are initially trained in facility operation/spill response procedures, review and renewal of previous knowledge is essential. Documented annual review of SOPs and other written documentation is required of all staff involved in facility operations and maintenance. Routine reports and inspection logs completed by staff are assessed to ensure that all data entered is accurate and complete. As individual staff may desire, additional training will be repeated upon request.

SOPs and other documents are periodically reviewed and updated as necessary to ensure that these critical reference documents are up-to-date and reflect the most recent regulatory requirements. Where updates are significant, out of sequence refresher training is conducted.

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FACILITY SPILL and TRANSBOUNDARY FLOW CONTAINMENT and CLEANUP

1. IBWC performs investigation and assessment Investigations on Transboundary Flow Events. The Owner and/or Operator provide the reports, which include volume estimations and timing. IBWC will determine the nature and impact of the event, identify the receiving waters, call for additional backup support and notify the appropriate agencies as required under section 6.3.2.1.2.8.1 of the Order.
2. As may be determined based on the information presented in the spill incident report, Owner/Operator will commission additional sand bags for the weirs at the drain/collectors. In addition, the Owner/Operator may use sand bags or containment barriers, alter the containment in the downstream storm drains and plug the downstream storm drains outlets to capture the spill and/or transboundary wastewater flow if possible. Lastly, the Owner/Operator may request excavation of contaminated soils as necessary to restore the environment to conditions prior to the spill.
3. The Operator coordinates the cleanup of the spill and/or transboundary wastewater flow which includes, but not limited to the following actions:
 - a. Collection of the solid and liquid material and other debris;
 - b. Vacuum truck recovery of wastewater or polluted water and wash down water;
 - c. Cleanup of the impacted storm drains in accordance with NPDES storm water permit.
 - d. The Operator leads the cleanup efforts within the drain/collectors of Transboundary Flow Events.
 - e. Should a spill occur within the treatment facility, pump stations, or other Operator managed facilities, the Operator will be wholly responsible for reporting and cleanup.
4. Investigation and cleanup of spills within Mexico shall be the responsibility of officials within Mexico. These efforts will include:

[Mexico may provide information for this section]

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NOTIFICATION and REPORTING

1. Documentation

The Prevention/Response Plan documentation of each event as required under section 6.3.2.1.2.9 of this Order including, but not limited to, a description of the spill event and its cause; exact dates and times for when the event started, when the Responsible Party (defined below) responded, when the event stopped, when containment and cleanup occurred, the volume recovered, the volume released to the environment, notifications made, and the steps taken or planned to mitigate and prevent recurrence of the event.

TYPE OF EVENT	RESPONSIBLE PARTY
Spill within the Facility	Operator
Outside of Facility	Owner (or Operator as requested)

The Preliminary Notice of Facility Spill / Transboundary Flow Event International Boundary and Water Commission Form report will be completed to cover these requirements. A copy of this form can be found within *Attachment B*.

2. Notification and reporting of Spill Event and Canyon Collector Transboundary Flow Events

This section of the Prevention/Response Plan shall apply to Facilities Spill Event and Canyon Collector Transboundary Flow Event. The Operator and/or IBWC will promptly notify the appropriate parties as directed within the Facility Spill and Transboundary Flow Event reporting. Please see *Attachment B* and the contact distribution list located within *Attachment C*). IBWC will regularly update the notification and reporting list (emails and phone numbers) to conduct adequate public notification to protect the public from exposure to spills and/or transboundary wastewater flows. The written notifications and reports will be provided to appropriate regulatory agencies, municipalities and other potentially affected entities to the extent required by the Order No. R9-2021-0001 NPDES CA0108928, other permits and licenses, state and Federal laws, local ordinances or as otherwise described in the Prevention/Response Plan.

3. Notification and reporting of Other Canyon Transboundary Flow or Tijuana River Transboundary Flow Events

This section of the notification and reporting Prevention/Response Plan shall apply to Other Canyon Transboundary Flow or Tijuana River Transboundary Flow Events. These events should be reported within 24 hours of the time the Operator and/or IBWC becomes aware of the event. IBWC shall provide for notification and reporting of such events to governmental agencies, municipalities, and other organizations as described in section 6.3.2.1.2.9 above. The event will be recorded on the reporting form, entitled California

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Regional Water Quality Control Board – San Diego Region – Transboundary Flow Event Form (most recently dated in November 2014). Please see *Attachment G* for example forms.

4. If the USIBWC and/or the Operator is notified of any spill event within Mexico.

The event will be recorded on the reporting form, entitled California Regional Water Quality Control Board – San Diego Region – Transboundary Flow Event Form (most recently dated in November 2014).

This report will be sent to the USIBWC and other agencies if relevant. Please note: The Operator is not responsible for the investigation, assessment, containment, cleanup, or documentation of such events, but only for the reporting of such events for which the Operator have the responsibility.

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COMMUNICATION and COORDINATION with MEXICO

IBWC will coordinate between the Operator, CILA, SPA, CESPT, the San Diego Water Board, and interested parties through regular meetings and written and/or oral communication to:

- a. Develop procedures for reducing, eliminating, and preventing recurrence of Transboundary wastewater flows resulting from an emergency or unanticipated outages of wastewater infrastructure on either side of the international border;
- b. Develop bi-national emergency response and notification procedures for loss of wastewater infrastructure capacity on either side of the international border;
- c. Review existing plans, specifications and reports of key wastewater infrastructure on both sides of the international border;
- d. Assist CILA and local agencies in Mexico, as requested by these entities through IBWC, in preventing, reducing, terminating, and recovering Transboundary wastewater flows;
- e. Provide a framework for bi-national actions and cooperation in achieving the goals and desired outcomes of the Prevention/ Response Plan; and
- f. Optimize use of available wastewater infrastructure capacity on both sides of the international border.

This topic shall include, but is not limited to, increases in available sewage collection and treatment capacity in Tijuana, and increase in wastewater flow diversion to the SBIWTP.

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PLAN IMPLEMENTATION

1. Plan Amendment

Responses to spills within the treatment facilities caused by the Operator are fully the responsibility of the Operator. Upon request by USIBWC, the Operator shall implement the plan for additional investigation and cleanup. These tasks include, conduct regular review and assessment of the Prevention/Response Plan to identify improvements and modify it as necessary to reduce, eliminate, and prevent the recurrence of spills and/or transboundary wastewater flows. The Owner shall keep the Prevention/Response Plan in an up-to-date condition and shall amend the Prevention/Response Plan whenever there is a change (e.g. in the design, construction, operation, or maintenance of the Facilities) which materially affects the potential for a spill and/or transboundary wastewater flow events; or which materially affects the response required for each event. The Owner shall include any modifications as an amendment to the Prevention/Response Plan and submit it to CIWQS within 30 days of making the amendment.

2. Posting

A copy of the most current Prevention/Response Plan shall be posted at a prominent location at or near the Facility (SBIWTP) and shall be readily available to Owner's and Operator's employees, contractors, and other representatives at all times. The Owner shall also post a publically available internet accessible copy of the most current Prevention/Response Plan on the Owner's website.

3. Recordkeeping - Log maintenance and retention of records

The Operator maintains records and documents at the facility (SBIWTP), which the Operator creates, for five years. IBWC maintains records and documents, which are created by USIBWC and other agencies and documents received from the Operator, at their offices for five years. The USIBWC reviews the dry events and prioritize the system deficiencies in order to devise a correction action strategy to prevent future spills.

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APPENDICES

Attachment A --- Canyon Collectors

- Stewart's Drain Collector
- Silva Collector
- Del Sol Collector
- Smuggler's Gulch Collector
- Goat Canyon Collector

Attachment B – Event Forms

- Transboundary and Spill Reporting
- Preliminary Notice of Facility Spill / Transboundary Flow Event International Boundary and Water Commission Form

Attachment C – Spill Plan Roles and Responsibilities

Attachment A

IBWC

Stewarts Drain Collector

Description:

- Collector gravity flows through a buried pipe to plant
- Footprint approx. 50 ft W x 150 ft L
- Inlet has barrier fence/grate

Screen:

- Number of Screens: 1
- Dimension: 5 ft x 1.5 ft
- Height off Floor: 2 ft

Drain Type: Drain Tile



IBWC Silva Collector

Description:

- Collector gravity flows through a buried pipe to the plant
- Footprint approx. 20 ft W x 25 ft L
- Inlet has no barrier fence/grate

Screen:

- Number of Screens: 1
- Dimension: 4 ft x 1.5 ft
- Height off Floor: 2 ft

Drain Type: Drain Tile



IBWC Del Sol Collector

Description:

- Collector gravity flows through a buried pipe to plant
- Footprint approx. 20 ft W x 15 ft L
- Inlet has no barrier fence/grate

Screen:

- Number of Screens: 1
- Dimension: 1.5 ft x 4 ft
- Height off Floor: 2 ft

Drain Type: Drain Tile



IBWC Smuggler's Gulch Collector

Description:

- Collector gravity flows through buried pipe to Hollister pump station and is pumped to the plant
- Footprint approx. 50 ft W x 80 ft L
- Inlet has no barrier fence/grate

Screen:

- Number of Screens: 4
- Dimension: 2 ft x 5 ft
- Height of Floor: 2.5 ft

Drain Type: One 4-inch hole core drilled at bottom of diversion box



IBWC

Goat Canyon Collector

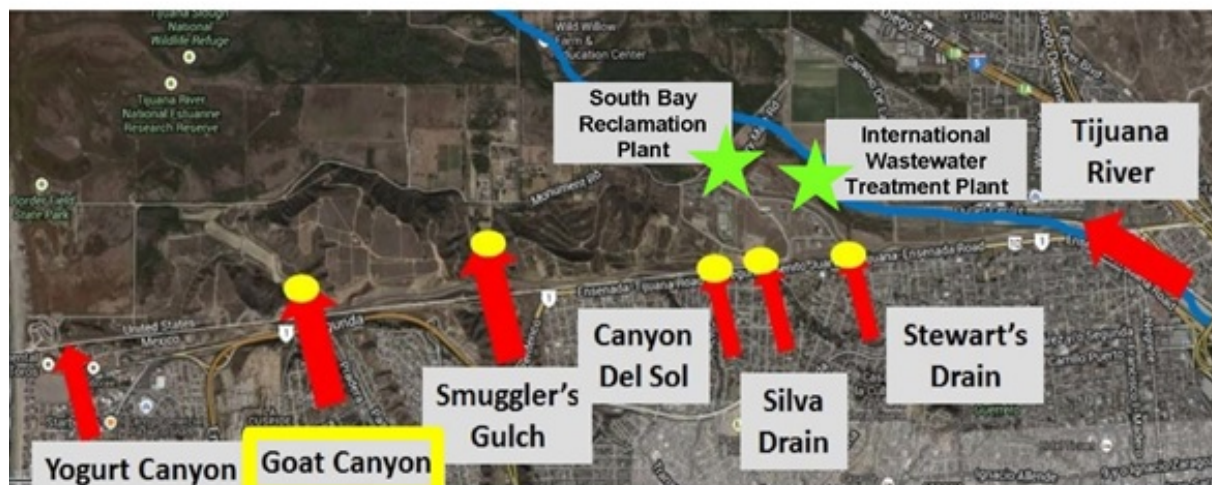
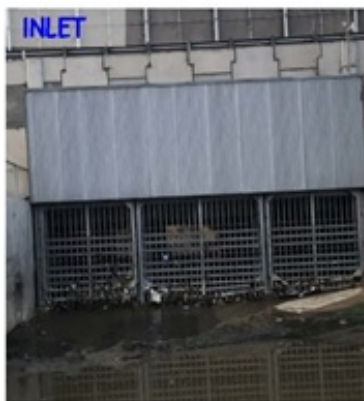
Description:

- Collector gravity flows through buried pipe to Goat Canyon Pump Station, is pumped to Hollister Pump Station, and is pumped to the plant
- Footprint approx. 75 ft W x 80 ft L
- Inlet has barrier fence/grate

Screen:

- Number of Screens: 4
- Dimension: 2 ft x 5 ft
- Height off Floor: 2.5 ft

Drain Type: Two 4-inch holes core drilled at bottom of diversion box



Attachment B

Transboundary and Spill Reporting

Overflow Less Than 1,000 Gallons

1. Contact the following **immediately** upon awareness of the overflow via telephone:

Morgan Rogers

Office – 619-662-7601

Mobile – 619-417-4613

2. Within 24 hours, complete and submit a Preliminary Notice of Sanitary Sewer Overflow, and Transboundary Flow NPDES forms to the following:

Morgan Rogers

Office – 619-662-7601

Mobile – 619-417-4613

Email: morgan.rogers@ibwc.com, yasser.fahmy@ibwc.com, anderson.dill@veolia.com,
mark.wippler@veolia.com

Overflow Greater Than 1,000 Gallons? Then

1. Within 4 hours, notify the following by telephone:

Agency	Contact Telephone #
California Office of Emergency Services Contact – Officer in Charge (for CAL OES Control Number)	(800) 852-7550
Department of Environmental Health County of San Diego Contact: Mark McPherson	(858) 565-5173
California Regional Water Quality Control Board (While spill is occurring) Contact: Vicente Rodriguez	(858) 598 -4498
City of Imperial Beach Contact – Gary Brown	(619) 423-0314

2. Complete the Preliminary Notice of Sanitary Sewer Overflow, Transboundary Flow NPDES form, AND the Spill and Transboundary Flow Report form from IBWC.
3. Place the signed and completed forms in the Operations Manager's Inbox.



PRELIMINARY NOTICE OF FACILITY SPILL/ TRANSBOUNDARY FLOW EVENT
INTERNATIONAL BOUNDARY AND WATER COMMISSION

TO: _____

DATE REPORTED: _____

TIME REPORTED: _____

REPORTED BY: _____

PHONE: 619-662-7600

OVERFLOW START: DATE: ____ / ____ / ____ (MM/DD/YY)

TIME: _____

OVERFLOW END: DATE: ____ / ____ / ____ (MM/DD/YY)

TIME: _____

TOTAL OVERFLOW VOLUME: _____ (GALLONS)

OVERFLOW VOLUME RECOVERED: _____ (GALLONS)

OVERFLOW LOCATION: (CIRCLE LOCATION)

INTERNATIONAL TREATMENT PLANT

STEWARTS DRAIN

SILVA DRAIN

CANYON DEL SOL

SMUGGLER'S GULCH

GOAT CANYON

OTHER (SPECIFY): _____

CAUSE (If Known): _____

DID THE OVERFLOW REACH SURFACE WATERS? _____ YES _____ NO

OFFICE OF EMERGENCY SERVICES NOTIFIED? _____ YES _____ NO

CAL OES Control Number: _____

Transboundary Flow NPDES CA0108928 Order No. R9-2021-0001

Type ____ A ____ B

(CAL OES 1-800-852-7550)

Name of Person Reporting Spill _____

Telephone No. of Person Reporting _____

Spill Location/Name _____

GPS Coordinates _____

Spill Reached: ____ Drainage Channel ____ Drainage Structure ____ Surface Water

Spill Reached: _____

Vol Spill to MS4 _____

Estimate Spill Volume from All Sources _____

Volume That Reached: Surface Water, Drainage Channel, Not Recovered from MS4 _____

Total Recovered Volume _____

Number of Spill Appearance Points _____

Appearance Descriptions _____

Spill Flow: Start Date _____ Start Time _____

Notification: Date _____ Time _____

Operator Arrival: Date _____ Time _____

Spill Flow: End Date _____ End Time _____

Cleanup Completed: Date _____ Time _____

Probable Cause of Spill _____

Notification of CAL OES Date _____ Time _____

CAL OES Control Number _____

Description of Spill Flow Destination _____

Spill Flow Cause _____

Spill Flow Failure Point _____

Spill Flow Storm Event _____

Spill Corrective Actions _____

Spill Flow Response Actions _____

Spill Flow Completion Date _____

Investigation _____ Reasons _____ Completion Date _____

Health Warnings Posted ____ Yes ____ No

Name of Beaches Impacted: _____ Surface Water Impacted: _____

Location and No. Of Samples Collected (Type A) _____ No. _____

Regulatory Agencies Receiving Results ____ Regional Water Quality Control Board _____

Methodology for Spill Volume Estimate ____ Calculated spill length X depth X Avg. width

Amount of Spill Recovered _____ None _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certifying Official _____ Title _____ Date _____

Signature _____

Attachment C

Attachment C - Spill Plan Roles and Responsibilities

ROLE	RESPONSIBLE PARTY	DESIGNATED INDIVIDUAL(S) TITLE	EMAIL ADDRESS(ES)	TELEPHONE NUMBER(S)
Overall Spill Plan Ownership	IBWC	Morgan Rogers, PE, Area Manager	morgan.rogers@ibwc.gov	619-662-7600
Coordinating Agencies	CILA CESPT	Names?		
Infrastructure Owner – US	IBWC	Morgan Rogers, Area Manager Dr. Yasser Fahmy, Civil Engineer	morgan.rogers@ibwc.gov yasser.fahmy@ibwc.gov	619-662-7600
Infrastructure Owner – Mexico	CESPT	Names?		
Canyon Collectors, Pumping Stations, Treatment Facility Manager	Veolia	Anderson “Monty” Dill, Plant Superintendent	anderson.dill@veolia.com	619-662-7687
Canyon Collectors, Pumping Stations, Treatment Facility Manager – Routine O&M Inspection/Oversight	Veolia	Michael “Mack” McKenzie, Maintenance Manager	michael.j.mckenzie@veolia.com	619-662-7687
Canyon Collectors, Pumping Stations, Routine Inspection and Maintenance	Veolia	Kurt Schmidt, Heavy Equipment Operator Designated Wastewater Operator	kurt.schmidt@veolia.com	619-662-7687
Spill Response Reporting – Lead Organization	Veolia	Anderson “Monty” Dill, Plant Superintendent Mark Wippler, Operations Manager	anderson.dill@veolia.com mark.wippler@veolia.com	619-662-7687
Spill Response Action Agencies	IBWC CILA CESPT	Morgan Rogers, Area Manager IBWC Dr. Yasser Fahmy, Civil Engineer IBWC Names?	morgan.rogers@ibwc.gov yasser.fahmy@ibwc.gov	619-662-7600