

6. Overflow Tracking

a. State Agency Reporting Program

This program includes written standard operating procedures which clearly define the minimum State Agency reporting requirements for events where sewage leaves the infrastructure before treatment, and the steps utility personnel must follow to meet or exceed those reporting requirements.

b. Local Agency Reporting Program

This program provides secondary notice to the public and to other appropriate organizations (e.g., downstream utilities with water intakes and local public health authorities) when an overflow presents an imminent and substantial threat to public health or the environment. The program includes written criteria for making this notice, procedures for notifying news media and posting notices at stream locations, and may also prepare an annual summary report available to the public.

c. Records Management Program

This program tracks all events where sewage leaves the utility's collection or transmission system before treatment (i.e., overflows to land, directly to waters, or indirectly to waters by storm drains or other paths). The program uses standardized forms which record, at minimum, the following information for response and inclusion in the IMS:

- ❖ Location of the discharge
- ❖ Name of the receiving water and description of the pathway (e.g., storm drain)
- ❖ Estimation of the discharge volume and the method of estimation
- ❖ Description of the system component that is source of the discharge
- ❖ Date and time the discharge started and stopped
- ❖ Root cause, or suspected root cause, of the discharge
- ❖ Steps taken to eliminate the discharge and steps taken to prevent reoccurrence.

7. Financial Analyses

a. Cost Analysis Program

This program regularly analyzes and projects future utility management, operations, and maintenance costs needed to properly implement these utility programs. The cost analyses include, at a minimum: overhead, labor and equipment, financial impacts of outsourcing certain activities, overtime, and the financial impacts imposed by organizational departments or agencies outside the utility. Cost analyses are performed for all management, operations, and maintenance equipment and the capital infrastructure investment. Cost analyses incorporate life cycle depreciation and establish cost-effective points for replacement. The program has a mechanism for including such replacement points in the IMS.

b. Capital Improvement Financing Program

This program analyzes, projects, plans and finances capital improvement needs established through proper engineering study. Capital improvement financing is planned using a five (5) year planning horizon with annual updates.