

Clean Water 2020 Program

CONTINGENCY EMERGENCY RESPONSE PLAN (CERP)

September 2015



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Program Summary and Intent

Introduction and Objectives

The City of Columbia (City) has developed a Contingency and Emergency Response Plan (CERP) to establish procedures for prioritizing and implementing the CERP to address both routine and catastrophic emergencies.

This CERP has been prepared in accordance with the requirements of Subparagraph 12.b of the Consent Decree (CD) entered by order dated May 21, 2014 in *The United States of America and State of South Carolina by and through the Department of Health and Environmental Control (SCDHEC) vs. the City of Columbia*, Civil Action No. 3:13-2429-TWL, DOJ Case Number 90-5-1-1-00954.

Below are a list of the CD requirements for the Contingency and Emergency Response Plan (CERP) and the sections of this document that address each requirement.

Table 0-1 CD Requirements for the Contingency and Emergency Response Plan

CD Section	CD Requirements	CERP Section
V. 12. b	<u>“Contingency and Emergency Response Plan.</u> Within eighteen months after Date of Entry of this Consent Decree, Columbia shall develop in consultation with DHEC and submit to EPA and DHEC for review, comment, and approval a Contingency and Emergency Response Plan (“CERP”). The CERP shall address both routine and catastrophic emergencies. Routine emergencies include such situations as overflowing manholes, line breaks, localized electrical failures and Pump Station outages. Catastrophic emergencies include floods, tornados, earthquakes or other natural events, serious chemical spills and widespread electrical failure. The CERP shall address areas of vulnerability and determine the effect of such a failure to operations, equipment and public safety and health based upon such factors as topography, weather, sewer system size, and other site-specific factors. The CERP shall include standard forms. The CERP shall have the following components:”	Section 1. CERP Overview
12. b. (i)	<u>“WWTP.</u> The WWTP component of the CERP shall establish standard operating procedures for use in emergency situations, including changes in process controls. “	Section 2. Metro Wastewater Treatment Plant (WWTP) CERP Components
12. b. (ii)	<u>“WCTS.</u> The WCTS component of the CERP shall include the SORP; the evaluation of, and acquisition plan for, additional Pump Station standby power and emergency equipment needs; and the written standard operating procedures for use in specific anticipated emergency activities, which include identification of the specific actions which staff should take and the instructions for operating equipment and systems. At a minimum, the standard operating procedures shall: identify criteria for initiating and ceasing the anticipated activities; identify the appropriate service/repair equipment and sources for that equipment; and describe the emergency planning for, and emergency use of, the following: stand-by power (e.g., generators or dual power feeds). Portable pumps, maintenance equipment (e.g., vacuum truck, jet washing truck and/or combination truck), and each Pump Station.”	Section 3. Wastewater Collection and Transmission System (WCTS) CERP Components

12. b. (iii)	<p><u>“Public Notification of Emergencies.</u> In addition to the reporting requirements set forth in Section IX (Reporting Requirements), Columbia shall establish, in coordination with DHEC:</p> <ul style="list-style-type: none"> A. criteria to be used as the basis for immediately notifying the public and other impacted entities, such as users with a downstream water intake, of an emergency situation caused by an SSO, diversion, Bypass, or effluent limit violation; B. a list identifying, by name, phone number and pager number, all Columbia staff who are responsible for notifying the public; C. a list identifying, by name and phone number, all public contacts, including local media outlets, who must be contacted during an emergency situation; D. a list identifying Columbia staff who are authorized to make public statements during emergency situations; and E. pre-scripted news releases for various types of emergency situations.” 	Section 4. Public Notification of Emergencies
12. b. (iv)	<p><u>“Notification of Regulatory Authorities.</u> In addition to the notification requirements set forth in the NPDES Permit, and the reporting requirements set forth in Section IX (Reporting Requirements), Columbia shall establish, in coordination with DHEC: (A) criteria to be used as the basis for immediately notifying DHEC of any emergency situation caused by an SSO, diversion, Bypass, or effluent limit violation; (B) a list identifying, by name, phone number and pager number, all Columbia staff who are responsible for notifying DHEC; (C) a list identifying, by name and phone number, all officials who must be contacted; and (D) standard reporting forms.”</p>	Section 5. Notification of Regulatory Authorities
12. b. (v)	<p>“An implementation schedule specifying dates and actions.”</p>	Section 6. CERP Implementation Schedule

Acronyms & Abbreviations

CD – Consent Decree

CERP – Contingency Emergency Response Plan

City – City of Columbia

CW2020 – City’s program to manage consent decree compliance

DUE – Department of Utilities and Engineering

EPA – United States Environmental Protection Agency

MGD – Million Gallons per Day

MOM – Management, Operations and Maintenance

Permit – NPDES (National Pollutant Discharge Elimination System) Permit

SCDHEC – South Carolina Department of Health and Environmental Control

SCE&G – South Carolina Electric and Gas

SOP – Standard Operating Procedure

SORP – Sewer Overflow Response Plan

SSO – Sanitary Sewer Overflow

WCTS – Wastewater Collection and Transmission System

WMD – Wastewater Maintenance Division

WTP – Wastewater Treatment Plant

WWTP – City of Columbia’s Metro Wastewater Treatment Plant

Section 1 CERP Overview

The CERP Overview addresses the following specific requirements of the CD:

- Subparagraph 12.b. – Contingency and Emergency Response Plan. Within eighteen months after Date of Entry of this Consent Decree, Columbia shall develop in consultation with DHEC and submit to EPA and DHEC for review, comment, and approval a Contingency and Emergency Response Plan (“CERP”). The CERP shall address both routine and catastrophic emergencies. Routine emergencies include such situations as overflowing manholes, line breaks, localized electrical failures and Pump Station outages. Catastrophic emergencies include floods, tornados, earthquakes or other natural events, serious chemical spills and widespread electrical failure. The CERP shall address areas of vulnerability and determine the effect of such a failure to operations, equipment and public safety and health based upon such factors as topography, weather, sewer system size, and other site-specific factors. The CERP shall include standard forms.

1.1 CERP Goal

The goal of the Contingency Emergency Response Plan is to provide guidance for emergency response actions taken by the City of Columbia Department of Utilities and Engineering (DUE). It will have the following components in response to various emergencies:

- Protection of public health and welfare
- Safety of Department personnel
- Protection of equipment and appurtenances within the system
- Continuation of the system function to assure proper collection, transmission and treatment of wastewater

1.2 Description of Sewer System

The WWTP is a 60 MGD (permitted daily flow) activated sludge system designed to provide preliminary treatment, primary treatment, secondary treatment, and disinfection prior to discharge to the Congaree River in accordance with effluent limitations, monitoring requirements, and other conditions stated in the NPDES Permit.

There are currently approximately 1,100 miles of gravity and force mains, and 28,000 manholes owned by the City located both inside the city limits and in portions of Richland and Lexington counties. There are 53 lift stations and five pump stations in the collection system. The Wastewater Collection and Transmission System (WCTS) conveys wastewater to the City’s Metropolitan Wastewater Treatment Plant (WWTP), located at 1200 Simmon Tree Lane.

1.3 Organizational Structure

The DUE maintains organizational charts depicting roles and responsibilities for management, operations and maintenance of the wastewater collection and transmission system. The City’s budget documents include relevant organizational charts and staffing levels.

Section 2 Metro Wastewater Treatment Plant (WWTP) CERP Components

This section describes the City of Columbia's Metro Wastewater Treatment Plant Contingency Emergency Response Plan Standard Operating Procedures (SOPs) to be used in emergency situations as described in Subparagraph 12.b.(i) of the CD.

- Subparagraph 12.b.(i) – WWTP. The WWTP component of the CERP shall establish standard operating procedures for use in emergency situations, including changes in process controls.

2.1 Metro WWTP Standby Power

The South Carolina Electric and Gas (SCE&G) provides three feeds into the WWTP. Two of the feeds originate from the same utility substation and only the feed coming into the plant entrance is in service. The other feed is disconnected and is used as a backup if the main feed is out of service for maintenance. Because these two feeds are not from two separate utility substations, if the utility substation requires maintenance or when the substation experiences a disturbance/electrical fault, both feeds are lost.

There is an additional dual point feed source on the 125-KV feeder just north of the plant property. SCE&G has the ability to feed the plant from either the eastern or western side of their area grid through a switch at the dual point source. If one area is damaged, SCE&G has the capability to isolate the damaged section of the feeder and re-energize the plant from the other side of the grid through the switch.

2.2 Metro WWTP Emergency Response Guides (ERGs)

Formalized standard operating procedures for uses in emergency situations, including changes in process controls, have been established and are summarized in the following table:

Table 2-1 WWTP Emergency Response Guides (ERGs)

ERG Number	ERG Description
WWTP ERG #1	Influent Pump Station
WWTP ERG #2	Preliminary Treatment Facility
WWTP ERG #3	Train 1 Primary Clarifier
WWTP ERG #4	Train 1 Aeration
WWTP ERG #5	Train 1 Secondary Clarifiers
WWTP ERG #6	Train 1 RAS Pump Station
WWTP ERG #7	Train 1 DAF
WWTP ERG #8	Train 2 Primary Clarifier
WWTP ERG #9	Train 2 Aeration
WWTP ERG #10	Train 2 Secondary Clarifiers
WWTP ERG #11	Train 2 RAS Pump Station
WWTP ERG #12	Train 2 DAF

ERG Number	ERG Description
WWTP ERG #13	WWTP Disinfection
WWTP ERG #14	Solids Holding (Digesters)
WWTP ERG #15	Sludge Dewatering

Section 3 Wastewater Collection and Transmission System (WCTS) CERP Components

This section describes the City of Columbia's Wastewater Collection and Transmission System Contingency Emergency Response Plan (CERP) components to be used in emergency situations as described in Subparagraph 12.b.(ii) of the CD.

- Subparagraph 12.b.(ii) – WCTS. The WCTS component of the CERP shall include the SORP; the evaluation of, and acquisition plan for, additional Pump Station standby power and emergency equipment needs; and the written standard operating procedures for use in specific anticipated emergency activities, which include identification of the specific actions which staff should take and the instructions for operating equipment and systems. At a minimum, the standard operating procedures shall: identify criteria for initiating and ceasing the anticipated activities; identify the appropriate service/repair equipment and sources for that equipment; and describe the emergency planning for, and emergency use of, the following: stand-by power (e.g., generators or dual power feeds), portable pumps, maintenance equipment (e.g., vacuum truck, jet washing truck and/or combination truck), and each Pump Station.

3.1 Sewer Overflow Response Plan (SORP)

The purpose of the City's Sewer Overflow Response Plan (SORP) is to facilitate a prompt and appropriate response to any sanitary sewer overflow, release, or diversion of wastewater from the wastewater system. Such events may include, but are not limited to, conditions in the city-owned collection system such as blockages and/or flow conditions that have the potential for wastewater backups into buildings, and/or discharges from the collection system designed to carry waste from the service area to the treatment plant. Discharges may involve manholes, pump stations, transmission lines, collection lines, or other appurtenances. Sewer back-ups can involve large volumes of wastewater and can pose a substantial threat to the receiving surface waters. Maintenance activities to repair sewer pipes can also create excessive sediment that can impact the storm sewer system.

This Plan reflects the procedures established for responding to reports of potential and confirmed SSOs, and for minimizing the impacts that SSOs and their related activities have on the environment, local waterways and the storm sewer system. Copies of this document have been provided to all persons who are involved in meeting its objectives.

The City has developed, maintains, and continues to implement a SORP, which was attached to the U.S. Environmental Protection Agency (EPA) Consent Decree Submittal entered on May 21, 2014 as Appendix D.

3.2 Standby Pump/Lift Station Standby Power

The City of Columbia owns and operates 53 pump stations. The following table lists the pump/lift stations with an onsite backup generator. Pump stations that do not have an onsite generator are equipped with an automatic transfer switch to allow for hook up to a portable generator in the event of power failure.

Table 3-1 Pump/Lift Stations with Onsite Backup Generator

PS No.	Pump/Lift Station
325	Blythewood Crossing Lift Station
025	Animal Shelter Lift Station
135	Georgetown Lift Station
050	Green Lakes Lift Station
145	Harbison #4 Lift Station
340	Hawkins Creek Lift Station
065	Mill Creek Pump Station
070	Myers Creek Pump Station
195	Saluda River Pump Station
200	Three Rivers Pump Station
110	West Columbia Pump Station
205	Wexford Pump Station
210	Wexhurst Pump Station

3.3 Emergency Response Guides (ERGs)

The Emergency Response Guides (ERGs) are formalized SOPs which include identification of the specific actions staff should take and the instructions to operate equipment and systems. The ERGs identify criteria for initiating and ceasing the emergency activity; identify the appropriate service/repair equipment and sources for that equipment; and describe the emergency planning and emergency use of the following: pump/lift station stand-by power (e.g., generators or dual power feeds), portable pumps, maintenance equipment (e.g., vacuum truck, jet washing truck and/or combination truck), and each Pump Station.

These ERGs have been developed and located for use by personnel.

Table 3-2 Collection System ERGs

ERG Number	ERG Description
Collection System ERG #1	Force Main
Collection System ERG #2	Gravity Sewer Lines
Collection System ERG #3	Manholes

Table 3-3 Pump Station ERGs

ERG Number	P/S No.	ERG Description
PS ERG #1	335	Broad River Pump Station
PS ERG #2	065	Mill Creek Pump Station
PS ERG #3	295	North Columbia Pump Station
PS ERG #4	195	Saluda River Pump Station
PS ERG #5	110	West Columbia Pump Station

Table 3-4 Lift Station ERGs

ERG Number	L/S No.	ERG Description
LS ERG #1	005	Atlas Road Lift Station
LS ERG #2	230	Bendale Lift Station
LS ERG #3	325	Blythewood Crossing Lift Station
LS ERG #4	330	Bookert Heights Lift Station
LS ERG #5	015	Burnside #1 Lift Station
LS ERG #6	020	Burnside #2 Lift Station
LS ERG #7	115	Clearwater Lift Station
LS ERG #8	120	Colonial Life Lift Station
LS ERG #9	125	Crockett Road Lift Station
LS ERG #10	025	Animal Shelter Lift Station
LS ERG #11	030	East Bluff Lift Station
LS ERG #12	130	Edventure Lift Station
LS ERG #13	035	Emerald Lakes Lift Station
LS ERG #14	320	Farrow Pointe Lift Station
LS ERG #15	250	Food Lion at Two Notch Lift Station
LS ERG #16	045	Galaxy Lift Station
LS ERG #17	040	Garners Ferry Road Lift Station
LS ERG #18	135	Georgetown Lift Station
LS ERG #19	050	Green Lakes Lift Station
LS ERG #20	140	Harbison #2 Lift Station
LS ERG #21	145	Harbison #4 Lift Station
LS ERG #22	150	Harbour Pointe Lift Station
LS ERG #23	340	Hawkins Creek Lift Station
LS ERG #24	055	Heathwood Hall Lift Station
LS ERG #25	155	Hillcreek #1 Lift Station
LS ERG #26	165	Homeless Shelter Lift Station
LS ERG #27	275	Killian Crossing Lift Station
LS ERG #27	060	Mallard Pointe Lift Station
LS ERG #28	170	Meadowlands Lift Station
LS ERG #29	070	Myers Creek Lift Station
LS ERG #30	075	Owens Field Lift Station
LS ERG #31	175	Piney Grove Lift Station
LS ERG #32	305	Prescott Manor Lift Station
LS ERG #33	080	Quail Creek Lift Station
LS ERG #34	180	Regatta Point #1 Lift Station

ERG Number	L/S No.	ERG Description
LS ERG #35	185	Regatta Point #2 Lift Station
LS ERG #36	190	Regatta Point #3 Lift Station
LS ERG #37	310	Shady Lane Lift Station
LS ERG #38	090	Starlite Lift Station
LS ERG #39	095	Swandale Lift Station
LS ERG #40	085	The Retreat Lift Station
LS ERG #41	200	Three Rivers Lift Station
LS ERG #42	100	Versch Lock Lift Station
LS ERG #43	105	Village Pond Lift Station
LS ERG #44	205	Wexford Lift Station
LS ERG #45	210	Wexhurst Lift Station
LS ERG #46	215	Windsong Lift Station
LS ERG #47	010	Woodlands Lift Station
LS ERG #48	220	Yacht Cove Lift Station

Section 4 Public Notification of Emergencies

This section describes the City of Columbia's Public Notification of Emergencies to be used in emergency situations as described in Subparagraph 12.b.(iii) of the CD.

- Subparagraph 12.b.(iii) – Public Notification of Emergencies. In addition to the reporting requirements set forth in Section IX (Reporting Requirements), Columbia shall establish, in coordination with [SC]DHEC:
 - A. criteria to be used as the basis for immediately notifying the public and other impacted entities, such as users with a downstream water intake, of an emergency situation caused by an SSO, diversion, Bypass, or effluent limit violation;
 - B. a list identifying, by name, phone number and pager number, all Columbia staff who are responsible for notifying the public;
 - C. a list identifying, by name and phone number, all public contacts, including local media outlets, who must be contacted during an emergency situation;
 - D. a list identifying Columbia staff who are authorized to make public statements during emergency situations; and
 - E. pre-scripted news releases for various types of emergency situations.

4.1 Public Notification Criteria

The SORP contains criteria developed to be used for immediately notifying the public and other impacted entities in the event of an emergency caused by an SSO, diversion, bypass or effluent limit violation. The same criteria developed for the SORP will be used for the CERP as noted below.

The Wastewater Maintenance Division (WMD) and the Metro Wastewater Treatment Plant Pump Station staff are responsible for reporting any confirmed sanitary sewer overflows that occur. WWTP Staff are responsible for reporting effluent diversion, bypass or effluent limit violations and will use a similar public notification procedure.

All confirmed SSOs, regardless of amount, will have a City of Columbia SSO Report Form completed and signed by the Director of Utilities and Engineering or his designee. This report will be signed and forwarded to the SCDHEC and the appropriate City Division within five calendar days.

- PUBLIC NOTIFICATION (SEWER OVERFLOW RESPONSE PLAN)
 - The same procedure would be used for diversion, bypass and effluent limit violations which potentially impact the health and safety of the public.
- TEMPORARY SIGNAGE (SEWER OVERFLOW RESPONSE PLAN)
 - The same procedure would be used for diversion, bypass and effluent limit violations which potentially impact the health and safety of the public.
- MEDIA NOTIFICATION (SEWER OVERFLOW RESPONSE PLAN)
 - The same procedure would be used for diversion, bypass and effluent limit violations which potentially impact the health and safety of the public.

- [DOWNSTREAM DRINKING WATER INTAKES \(SEWER OVERFLOW RESPONSE PLAN\)](#)
 - The same procedure would be used for diversion, bypass and effluent limit violations which potentially impact the health and safety of the public.

4.2 City Staff – Public Notification List [\(SEWER OVERFLOW RESPONSE PLAN\)](#)

The SORP has identified by name, phone number and cell phone number the staff persons responsible for public notification.

4.3 Public Contact – Public Notification List [\(SEWER OVERFLOW RESPONSE PLAN\)](#)

The SORP provides a list identifying by name, phone number and cell phone number, all public contacts, including local media outlets that must be contacted during emergency situations.

4.4 Public Statements – Staff List [\(SEWER OVERFLOW RESPONSE PLAN\)](#)

The SORP provides a statement and identified personnel that are authorized to make public statements during emergencies.

4.5 Public Statements – Pre-Scripted News Releases [\(SEWER OVERFLOW RESPONSE PLAN\)](#)

The SORP has pre-scripted news releases for various types of emergency situations.

4.6 Regulatory Reporting

All confirmed SSOs, regardless of amount, will have a City of Columbia SSO Report Form completed and signed by the Director of Utilities and Engineering or his designee. This report will be signed and forwarded to the SCDHEC and the appropriate City Division within five calendar days.

- [PUBLIC NOTICE \(SEWER OVERFLOW RESPONSE PLAN\)](#)
- [TEMPORARY SIGNAGE \(SEWER OVERFLOW RESPONSE PLAN\)](#)
- [MEDIA NOTIFICATION \(SEWER OVERFLOW RESPONSE PLAN\)](#)
- [DOWNSTREAM DRINKING WATER INTAKES \(SEWER OVERFLOW RESPONSE PLAN\)](#)

Section 5 Notification of Regulatory Authorities

This section describes the City of Columbia's Notification of Regulatory Authorities to be used in emergency situations as described in Subparagraph 12.b.(iv) of the CD.

- Subparagraph 12.b.(iv) – Notification of Regulatory Authorities. In addition to the notification requirements set forth in the NPDES Permit, and the reporting requirements set forth in Section IX (Reporting Requirements), Columbia shall establish, in coordination with DHEC:
 - A. criteria to be used as the basis for immediately notifying DHEC of any emergency situation caused by an SSO, diversion, Bypass, or effluent limit violation;
 - B. a list identifying, by name, phone number and pager number, all Columbia staff who are responsible for notifying DHEC;
 - C. a list identifying, by name and phone number, all officials who must be contacted;
 - D. standard reporting forms.

5.1 Criteria for SCDHEC Notification

If a potential SSO is confirmed to be an SSO, the following criteria is used to notify DHEC:

1. The individual responding to the SSO will report findings to an appropriate Division Superintendent or his/her designee.
2. An appropriate Division Superintendent or his/her designee will document immediate actions taken to mitigate the SSO and the steps taken to prevent recurrence. These notes will become a part of the final 5-Day Written Report filed for the record and used for notification purposes.
3. NPDES Effluent Notification Violation

- [IMMEDIATE NOTIFICATION \(SEWER OVERFLOW RESPONSE PLAN\)](#)
- [24-HOUR REPORT \(SEWER OVERFLOW RESPONSE PLAN\)](#)
- [5-DAY REPORT \(SEWER OVERFLOW RESPONSE PLAN\)](#)

5.2 City Staff – SCDHEC Public Notification List [\(SEWER OVERFLOW RESPONSE PLAN\)](#)

The Sewer Overflow Response Plan has identified and includes by name, phone number and cell phone number the staff persons responsible for public notification.

5.3 Official Notification List [\(SEWER OVERFLOW RESPONSE PLAN\)](#)

There is an Official Notification List for the City of Columbia referenced in the SORP.

5.4 Standard Reporting Forms [\(SEWER OVERFLOW RESPONSE PLAN\)](#)

Standard Reporting Forms for reporting SSOs are located in the SORP.

Section 6 CERP Implementation Schedule

This section describes the City of Columbia’s Metro Wastewater Treatment Plant Contingency Emergency Response Plan Implementation Schedule as described in Subparagraph 12.b.(v) of the CD.

- Subparagraph 12.b.(v) – An implementation schedule specifying dates and actions.

Table 6-1 CERP Implementation Schedule

No.	CERP Section	CD Section	Action Description	Implementation Schedule
1.0	1.1	V. 12	Training Staff on the Activation of the CERP <ul style="list-style-type: none"> ▪ Material Development 	Implemented 12 months following EPA approval of CERP
2.0	1.1	V.12	Emergency Operation Training and Activation Procedures <ul style="list-style-type: none"> ▪ Establish additional procedures and coordination with other DUE staff (Water, Engineering, etc.) 	Implemented 12 months following EPA approval of CERP
3.0	1.1	V.12	Develop and Train Staff to Scenarios <ul style="list-style-type: none"> ▪ Identify Scenarios <ul style="list-style-type: none"> ○ Hurricanes ○ Ice Storms ○ Flooding ○ Power Failure 	Implemented 12 months following EPA approval of CERP