



# ORANGE COUNTY SANITATION DISTRICT

July 30, 2004

Gerard Thibeault, Executive Officer  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, CA 92501-3339

Subject: Report of Progress for Adoption of Legal Authority to Comply With Order No. R8-2002-0014 (General Waste Discharge Requirements for Sewage Collection Agencies in Orange County Within the Santa Ana Region).

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The Orange County Sanitation District ("District") is committed in complying with the requirements of Order No. R8-2002-0014. As to the "Legal Authority" requirements identified in Section C.12(iii) of the Order, the District reports as follows:

(A) Legal authority to control infiltration and connections from inflow sources, including satellite systems:

- ✓ Section 203 of Ordinance OCSD-01 (attached), adopted in July 1998, prohibits discharges of groundwater, surface groundwater, surface runoff, or subsurface drainage directly or indirectly to the District's sewerage facilities.

(B) Legal authority requiring that sewers and connections be properly designed and constructed:

- ✓ In addition to its 1989 Master Plan and 1999 Strategic Plan, the District has adopted an extensive set of standard plans and specifications governing the design and construction of the District's sewerage facilities and connections to them. Additionally, Sections 302.1.B and 303.1.B of Ordinance OCSD-01 require dischargers to submit plans to the District of sewers connecting to the District's sewerage system for evaluation. A CD-ROM containing standard specifications and design criteria is attached.
- ✓ As for the District's own sewers, the Board of Directors reviews and approves plans and specifications prepared by or at the direction of the District's Engineering Department for all construction projects.

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(C) Legal authority to ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated service laterals):

- ✓ The District's standards for design and construction specifications and other requirements identified in response to item (B) above include inspection standards to ensure compliance with the District's design and construction standards. The District further complies with the State's uniform construction laws implemented through the latest edition of the California Plumbing Code for building sewers directly or indirectly connecting to the District's sewerage facilities. Additionally, Section 3.03 of Ordinance OCSD-22, adopted in January 2004 requires connection permits for all direct or indirect connections to the District's sewerage facilities.

(D) Legal authority to limit fats and greases and other debris that may cause blockages in the sewage collection system.

- ✓ Section 206 of Ordinance OCSD-01 prohibits discharges of waste from industrial or commercial grinders except wastes generated in packing or preparing food or food products. Furthermore, Section 209 of Ordinance OCSD-01 prohibits discharges of wastewater containing excessive flows of oil and grease of animal or vegetable origin, or material which will readily settle or cause an obstruction to flow in the sewer resulting in interference, such as, but not limited to, sand, mud, glass, metal filings, diatomaceous earth, cat litter, asphalt, dead animals, wood, bones, hair, and fleshings.
- ✓ Ordinance OCSD-01 authorizes the District to require food service establishments within areas where the District controls the local collection system to obtain industrial discharger permits. However, the District has recently completed preparation of special fats, oils and grease control regulations applicable to food service establishments. These specific regulations are being reviewed by the various committees of the Board of Directors. We project that the Committees will present the special regulations to the Board of Directors in October, with final adoption set for November 2004. The District intends to implement the special regulations with the FOG Control Program that Order No. R8-2002-0014 requires, by December 31, 2004.



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- (E) Implement the general and specific prohibitions of the national pretreatment program under 40 CFR 403.5:
- ✓ Ordinance OCSD-01 adopts the District's wastewater discharge regulations, which fully implement the requirements of 40 CFR 403.5.

Please do not hesitate to contact us should you or your staff have any questions pertaining to this matter.

Blake P. Anderson  
General Manager

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Attachments

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