City of Franklin
Sewer Overflow Response Plan

January 2018

Summary of Modifications

Date	Author(s)	Description of Change
9/7/2016	MMH/MSH/HS/JL	Initial SORP Publication
3/21/17	MMH	Modifications based on Settlement Agreement
1/9/18	MMH	Annual review of document

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Section 1
Introduction and Process Overview

1.1 General

The City continues to provide an efficiently designed, maintained, and operated sanitary sewer system that collects and conveys wastewater to the Water Reclamation Facility (WRF) at 135 Claude Yates Drive for treatment. Occasionally, debris or other foreign objects enter the collection system and create blockages or restrict flow and overtime these flow restrictions may cause an overflow or release.

An overflow/release occurs when sewage escapes from the sanitary sewer system at some point other than the through the permitted outfall at the WRF. An overflow/release can result from flow restrictions in the system as described above or system disruptions, or it may result from excessive flows caused by elevated ground and surface water during significant rain events.

The City of Franklin developed this Sanitary Sewer Overflow Response Plan (SORP) to reduce the potential impact of overflows/releases to human health and the environment. This document provides structured guidance for response to overflows, including a range of appropriate and effective field activities crews can choose from to meet the needs of each event.

The purpose of the SORP is to document the protocol that will be followed in response to identified overflows/releases within the City's wastewater collection service area, while providing sufficient flexibility to address case-specific issues as appropriate. This protocol includes an initial mobilization response once an incident notification is received; stoppage of the overflow/release within a reasonable period of time; and any other required follow-up actions to further reduce the potential for any future occurrence. In addition, monitoring and reporting procedures are included to comply with the Tennessee Department of Environment and Conservation (TDEC) requirements.

1.2 Objectives

The primary objective of the SORP is the protection of human health and the environment related to potential concerns associated with overflows/releases. This SORP shall be updated every five years or upon substantive changes in operations or NPDES permit conditions.

1.3 Process Overview

This SORP provides structured guidance for response to overflows/releases, including a range of appropriate and effective field actions that the City can choose from to meet the needs of each situation. The City will use its discretion and best professional judgment to evaluate each event and choose the appropriate remediation methods and tools.

The City of Franklin is a steward of the environment, and the first priority at any overflow/release is stopping and containing the discharge. Quick responses can minimize possible harmful impacts to the environment and public health to the extent reasonably possible. Early identification of an overflow/release is extremely important to reduce the quantity of raw sewage discharged, as well as limit the impact on the environment and the general public. The investigation process typically begins

when a customer, City employee, our outside party reports a possible overflow/release from the collection system.

Historically, the City has a rapid response time when the notification about an overflow/release is received. A review of the overflows between 2009 and 2013 indicate the City's response time averaged approximately 25 minutes from the time the initial notification was received.

This SORP contains the following procedures used for responding to events that can reduce or minimize the environmental impacts and potential human health risks:

1. Procedures for stopping the discharge using equipment the equipment available, or processes to obtain additional equipment.
2. Procedures for minimizing the volume of untreated wastewater transmitted in the event of an overflow/release.
3. Procedures for immediate public notice of the incident, as necessary.
4. Procedures for providing timely notification to the regulating agency.
5. Procedures for providing relief to customers experiencing building/private property backups resulting from problems in the collection system.
6. Annual reviews of the available equipment as necessary to respond to an overflow/release and implement the procedures in this SORP.
7. Procedures for ensuring the preparedness, including responsiveness training, of necessary City employees and contractors for effective implementation of this SORP.
8. Procedures for follow-up inspection and maintenance of the location where the overflow/release occurred to minimize potential future incidents.

Section 2
Definitions

This section is designed to help familiarize readers with common terms and acronyms used in this document. It includes basic definitions of a wastewater collection system and overflows/releases, for example, which will assist readers with understanding the scope of this document. It is important to note that the most current definitions are found in the City of Franklin's NPDES Permit. The City's NPDES Permit can be found by following the link in Section 6 of this document.

2.1 General Definitions

CCTV – Closed Circuit Television, a type of inspection used in sanitary sewer assessment.

Dry-weather Sanitary Sewer Overflow (SSO) - A type of sanitary sewer overflow that is not directly related to a rainfall event.

FOG – Fats, oils and grease

HAZMAT – Hazardous Materials Team, first responders trained to operate with hazardous chemicals to humans and the environment.

I/I – Infiltration/Inflow, the quantity of water from inflow, infiltration, and rainfall-induced infiltration without distinguishing the source.

NPDES – National Pollutant Discharge Elimination System, a program run by the US Environmental Protection Agency to address water pollution by regulating point sources that discharge into waters of the United States.

Release – is the flow of sewage from any portion of the collection or transmission system owned or operated by the City other than through permitted outfalls that does not add pollutants to waters. A "release" may be due to improper operation or maintenance of the collection system or may be due to other cause(s).

In addition, a "release" includes a backup into a building or private property that is caused by blockages, flow conditions, or other malfunctions originating in the collection and transmission system owned or operated by the City. A "release" does not include backups into a building or private property caused by blockages or other malfunctions originating in a private lateral.

Sanitary Sewer Overflow (SSO) – is an unpermitted discharge of pollutants from the collection or transmission system owned or operated by the permittee other than through a permitted outfall. An overflow can be attributed to a wet weather event and

TDEC – Tennessee Department of Environment and Conservation, the regulatory authority responsible for implementing and enforcing the NPDES program.

SORP – Sanitary Sewer Overflow Response Plan, this plan that provides structured guidance, including a range of field activities to choose from, for a uniform response to overflows/releases.

WMD – Water Management Department, part of the City of Franklin that operates and maintains the collection and transmission system to which this SORP refers.

Section 3
System and Organizational Structure

3.0 Organizational Structure

Implementing an effective SORP requires coordination from several different levels of employees within the Water Management Department (WMD) and within the Administration offices of the City of Franklin. The following core practices are necessary to ensure the plan is implemented effectively:

- Effective and timely communication
- Trained and experienced Sewer Equipment Technicians and crews
- Structured and concise response procedures
- Accurate and comprehensive monitoring procedures
- Regularly scheduled training of the staff on SORP protocol and safety practices
- Continuous scheduled revaluation of the SORP and attachments for applicability and effectiveness

This section outlines the organization and the distribution of responsibilities within the City's WMD.

3.1 City of Franklin Wastewater Collection System

The City of Franklin's collection system serves an area of 40 square miles in the City limits and 2 square miles outside the City limits. The system serves more than 70,000 customers and is composed of:

- 350 miles of collection system gravity lines
- 35 miles of collection system forcemains
- 8,790 manholes
- 26 pump stations
- 1 wastewater treatment plant
- 4 industrial users

3.2 Operational and Functional Structure

The City of Franklin WMD has an organizational structure in place to provide operations and maintenance of the collection system, as well as the other Public Works Departments (Parks, Engineering, Sanitation & Environmental Services, and Streets) through equipment and/or personnel sharing. An organizational chart of the WMD is included in **Appendix A**. While there are dedicated employees for sewer response protocols, all employees in the Service Division can be pulled from regular job duties to perform work as required.

As can be seen from **Appendix A**, the Wastewater Collection Assistant Superintendent directs work for the CCTV inspectors, sewer equipment technicians, and the maintenance technicians. Equipment operators, utility service workers, utilities crew chiefs, and grounds workers are shared resources in the Service Division and are available to the Wastewater Collection Assistant Superintendent as necessary.

The Wastewater Collection Assistant Superintendent is directed by the Service Division Superintendent who provides guidance and support, and helps establish needs or requirements for the Department. The Director and Assistant Directors of the Water Management Department are responsible for maintaining compliance with the regulatory requirements of the City's National Pollutant Discharge Elimination System (NPDES) permit and the reduction of the impact of overflows/releases on the City's customers and surrounding environment. The Director and Assistant Directors work closely with the Service Division Superintendent and Wastewater Collection System Assistant Superintendent to meet this requirement through capital project planning and routine scheduling of maintenance.

Every other weekend the on-call Assistant Superintendent varies between the Wastewater Collection Assistant Superintendent and the Water Distribution Assistant Superintendent. As described below, when a call is received it is routed to the on-call Assistant Superintendent, as both are well-versed in the procedures of this SORP and responses to overflows/releases from the collection system.

3.3 Customer Calls and Dispatching

During normal business hours (7:00 am to 4:00 pm, Monday through Friday), calls are received by the Administrative Assistant located at the Public Works Building. When a call is received pertaining to a potential overflow/release, the information is documented and immediately dispatched to the Wastewater Collection Assistant Superintendent to assign a crew. All Sewer Equipment Technicians have City-issued cell phones that enable communication throughout the day.

All customer calls received after business hours are automatically routed to the Water Treatment Plant (WTP) for initial documentation. The WTP receives the call and documents all information from the citizen. They then route all information to the on-call Assistant Superintendent for dispatching of crews, etc.

Section 4
Initial Response

4.0 Goals and Procedures

The goal of the SORP is to document the WMD's procedure for responding to overflows/releases and to create a consistent procedure so that all responses are effective and efficient. This document is intended to address most types of events and outline appropriate efforts to reduce the impact on the environment and protect public health from potential hazards associated with the overflow, release, or backup. The City will respond upon notification of an event and use its discretion and best judgment to evaluate the occurrence and select the appropriate remediation techniques. It is noted that all situations are different and may require a customized approach. This document, while intended to guide a response, can be used as a guideline if other actions are warranted.

When notification is received, a timely response enables crews to gather important information concerning the cause of the overflow/release, potential health hazards, and potential environmental impacts. This information enables decisions to be made on an educated basis regarding the correction of the overflow/release, the containment, and notification to the general public, if necessary. In the event of an overflow/release, the initial response actions taken allow the WMD to proceed per an established plan.

The following steps outline the basis for the City's initial response to an occurrence, from the time the Department receives the initial call until the incident is addressed and remediated. Additional procedures for long-term responses and required regulatory reporting are discussed further in **Section 5**.

4.1 First Response

The City receives reports of potential overflows/releases/backups from multiple sources, however, most reports are provided by the individual who is witnessing the potential occurrence. Individual residents or citizens can report the overflow to the main Public Works line, (615) 794 – 4554. The call will be received during normal business hours or will be routed to the WTP if received after normal business hours. After hours calls can be made directly to the WTP at (615) 791 – 3260.

As discussed in Section 3.3, the initial call information is documented and immediately routed to the Wastewater Collection Assistant Superintendent. The information below is used to generate the initial report:

- Time and date of call
- Name of person reporting the incident and contact information for the caller (address and phone number)
- Location of the potential overflow/release/backup
- Description of the potential overflow/release/backup
- Any additional observations such as odor, color, duration, etc.

- Any information that may help with response time, containment, and remediation of the potential overflow/release/backup

Once the information is routed to the Wastewater Collection Assistant Superintendent, crews are dispatched for immediate response. If it is afterhours, the call is not immediately logged into the IMS, however, the same information is collected from the WTP staff and conveyed to the on-call Assistant Superintendent to dispatch the appropriate crews. Currently, the City has two vacuum trucks and four crew members used to respond to overflows. In addition, the City utilizes two staff members to operate a CCTV truck that can assist with potential overflow/release/backup responses.

The following is a description of the step-by-step procedures taken to resolve an overflow/release immediately. A general flowchart is included in **Appendix B** that can also be used as a quick reference for the initial response.

4.2 Confirm Sanitary Sewer Overflow

4.2.1 Manhole or Residential SSO

When a report is received that the occurrence of a wastewater overflow/release is potentially occurring from the collection system, a Technician is dispatched to the scene to confirm if there is a discharge. Sewer Equipment Technicians are the lead agents for the City's response and are experienced employees familiar with the collection system and this response protocol.

If a manhole is reported to be overflowing and is visually confirmed to be overflowing, crews will document the flow rate and reach of the overflow with pictures. Next, the technician will begin to try and ascertain the source of the overflow/release and cause of the discharge or origin of the flow.

If a backup is occurring within a household, the Wastewater Collection Assistant Superintendent will dispatch a Technician to the site to assess the situation. When the technician arrives, check the main first at nearest downstream and upstream manhole. Partial blockage indicate City side problem.

Then he locates the cleanout on the residences private plumbing and determines if flow is moving through the private plumbing line. If flow is not moving through the line, the blockage is on the resident's side and no further action is needed by the Department.

If City cleanout full of water, between cleanout and main – City responsibility.

If private cleanout full of water, between cleanout and house – resident responsibility.

If flow is moving through the cleanout procedures in **Section 4.4** are initiated.

4.2.2 Pump Station SSO

Alarms at the pump stations can be received 24 hours per day. During normal business hours, alarms are monitored by the four Maintenance Technicians through SCADA via laptops or cell phones. After hours, the SCADA system alarms are monitored by the on-call Assistant Superintendent or the on-call Maintenance Technician via cell phone and laptop.

Each weekend per month a Maintenance Technician is on call and drives a City vehicle home in case of the need to respond to calls. Some alarms may not require a response, however, if a response is needed the appropriate responding Technician is responsible for the investigation and correction of the alarm,

conveying all information to the on-call Assistant Superintendent for larger action (if needed). All trucks are equipped with adequate spare parts and each Technician has a City-issued Purchase Card that can be used for immediate purchases at local stores or for immediate service requests to outside vendors.

In addition to the Purchase Card, resources available to the Maintenance Technicians for use during a pump station SSO include:

- Generator (trailer mounted) - 1
- Generator (portable) - 1
- Vacuum Truck - 2
- CCTV truck - 1
- 6-inch bypass pump - 2
- Level transducer – 1
- Controller - 1
- Crane truck – 1
- Radio – 1

The above equipment is housed at the main Public Works building south of downtown Franklin and central to the City's service area. Each employee has keyed access to enter the building after hours for emergencies and is authorized to use the equipment.

4.3 Determine Whether Suspicious Substances May Be Present

When arriving on the site, the Sewer Equipment Technicians will determine if there are any potential suspicious substances in the discharge. If there is an oily sheen to the liquid or a strange odor, for example, the Technician will notify the Assistant Superintendent and advise that there may be a possibility of a hazardous or potentially dangerous material. The Technician will then wait for guidance regarding appropriate actions.

If directed, the Technician will establish a control zone and wait for a hazardous materials team (HAZMAT) or appropriate agency before proceeding. The Technician will take direction from the lead of the team until the area is deemed safe, at which time the crew will proceed with containment and remediation of the overflow/release as necessary.

4.4 Locate the Disruption and Assess the Impacted Area

The Technician has access to hardcopy maps and an electronic interactive map of the collection system. The electronic interactive map of the collection system can provide the pipe type and diameter and information if the surrounding pipes were recently cleaned or assessed for blockages.

The Technicians understand that an overflow/release can occur anywhere in the collection system and that each may require a unique plan of action based on location and other circumstances. The crew should determine the resources necessary to remedy the blockage and provide the necessary jetting, vacuuming, rodding, or other technology necessary to clear the obstruction. If an unusual situation exists, the Technician will immediately call the Assistant Superintendent to develop an appropriate plan of action.

While the Technician is working to determine the location of the issue, another crew member identifies the total impacted area. The crew member will canvas the area to determine what potential impacts are present to the environment and/or public health and will identify the appropriate steps to minimize/mitigate those potential impacts. Factors to be included in evaluating the impacted or potentially impacted area, include, but are not limited to, the proximity of the overflow/release to the following:

- Waterbodies, reservoirs, wetlands, or other natural waterways;
- Stormwater infrastructure (inlets, curbs and gutters, etc.);
- Public use areas; and
- Special facilities including schools, public parks, walking trails, etc.

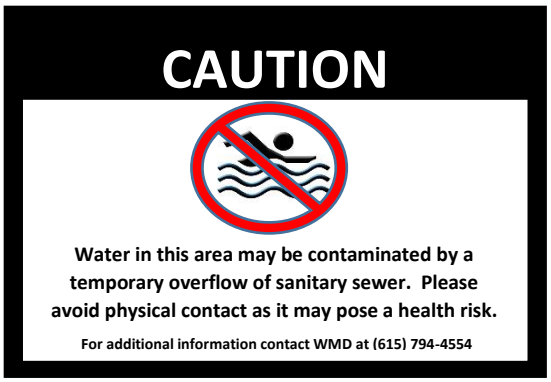
4.5 Establish Control Zone (Public Property) & Public Communication

When the area impacted by the overflow/release is identified, the next step of the initial release response stage is to develop and implement a control zone around the impacted area and identify the appropriate public communication tools necessary to convey the extent of the overflow.

For overflows that are determined to potentially have impact on the surrounding public, the following chart has been created to notify the public and to create control zones that will limit the public's access.

Scenario	Event	Action	Duration
1	Blockage related to overflows greater than 1,000 gallons (estimated) into nearby waterbodies	Temporary signs along the waterbody 1,000 yards upstream and downstream of the affected area at intervals of 200 yards or at public access points	Signs remain in place 48 hours after cleanup is completed
2	Blockages in residential or high-traffic area (e.g. school or public park)	Place door hangers (or other forms of notifications) on impacted homes or businesses	Immediate
3	Severe weather issues resulting in widespread issues (e.g. flooding)	Issue news release warning of potential hazards from flooding, stormwater runoff, and overflows occurring	Immediate
4	All other blockages	Post temporary signs and establish control zone	Signs and control zones to remain in place until cleanup is complete

For Scenario 1, the following signage (or similar) will apply to establish control zones as specified in the above table.

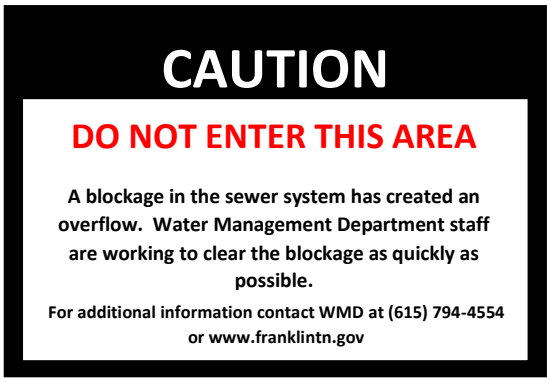


For Scenario 2, a door hanger or other form of notification with the following or similar information will be used to notify impacted homes and businesses:

- Notification of an SSO or release
- Date and time SSO or release was reported to WMD
- Anticipated schedule for correction
- Statement consistent with the following:
    - Caution – A blockage or malfunction in the sanitary sewer system has created an overflow/release in the immediate area. Water Management Department Staff are working to correct the problem as quickly as possible.

For Scenario 3, a news release will be crafted through coordination with the City's Communications Manager and released through various forms of media.

For Scenario 4, the following signage (or similar) will apply to establish control zones as specified in the above table.



4.5.1 City of Franklin Website (www.franklintn.gov)

The City will post on its website an ongoing list of overflows/releases within public infrastructure within two business days of each occurrence. Once a month, the City will post a summary of overflows and releases on its website that will include the following information:

- Date

- Time & duration
- Location by nearest intersection or other known landmark
- Estimated volume
- Status of clean-up
- Identified cause of blockage (if determined)

This summary is meant to provide education to the City's sanitary sewer customer's that any foreign debris that enters the collection system can cause an overflow/release and threaten public health and the environment.

4.6 Identify Resources and Technique Requirements

The Department will use all necessary response procedures and implement essential methods so that the goals of the SORP are met and the overflow/release is stopped and the flow contained, mitigated, and remediated.

The following resources are available, as needed, and a complete listing of currently available equipment can be found in **Appendix C**.

- Skilled and trained personnel
- Excavation equipment
- Portable generators
- Sewer cleaning equipment
- Closed-circuit television (CCTV) equipment
- Repair parts and materials
- Bypass pumping equipment
- Other containment materials such as sand bags, silt fences, signs, disinfectant, etc.

The Assistant Superintendent will identify the necessary resources and techniques based on site accessibility, location of the disruption of service, size of the impacted area, and opportunities to minimize any impacts to the environment and public.

In an emergency situation, the Department can initiate special procurement or contractual processes to access additional resources from outside contractors as needed. Immediate procurement of services and equipment requires the Department Director to inform the City Administrator of the emergency status.

4.7 Isolate or Contain the Overflow/Release

Containing the overflow/release may require the establishment of a physical barrier to control further dispersal of wastewater, thus reducing potential adverse impacts. The appropriate barriers and containment zones will vary, based on the site, and will be developed on a case-by-case basis. Appropriately developed and established containment will consolidate the wastewater into a defined area, if needed. Entry points into the stormwater system may be obstructed using various methods to reduce or eliminate flow into the system.

4.8 Mitigation/Remediation Solutions

The type of mitigation and remediation will vary depending on the cause of the overflow/release. Wet-weather events are usually caused by significant amounts of infiltration and inflow (I/I) into the collection system, however the City's collection system experiences very little wet-weather overflows attributed to capacity-related issues. Mitigation may be difficult in wet-weather situations because until the wet-weather event which triggered the release subsides, the risk of overflows/releases may remain. When the event ends, the City will implement practices to clean and disinfect the identified site(s) as necessary. Additional pumping capacity may help in wet wells of larger pump stations if other problems are not created downstream or elsewhere in the system.

Dry-weather events may be addressed using several methods and are the most common type of blockage in the City's sewer system. These types of overflows/releases are typically caused by debris or foreign objects in the sewer system. Technicians identify the most effective method or combination of methods to return service to the system as quickly as possible. CCTV is also used to determine if there is a greater concern related to the service disruption (e.g. collapsed pipe, unmovable blockage, etc.). CCTV inspections may identify the cause and location of the problem and help identify the necessary techniques needed to eliminate it.

4.8.1 Abatement Resolution Techniques

The following common abatement resolution techniques can be used independently or in combination, depending on field conditions:

- Grease/Roots/Other Blockages – Combination cleaner/flusher equipment is commonly used to remove any grease, roots, or other obstruction from the line or manhole. A root cutter attachment may be necessary to remove the obstruction in a line. Follow-up, once the initial response is completed, may include chemical root control as needed.
- I/I Contribution – The City currently has 13 permanent flow monitors within the system that help determine where potential I/I is a factor. In the case of continuous I/I creating capacity-related overflows, additional temporary monitors will be placed in locations to determine specific needs of the collection system, in addition to authorizing work in this area to increase diameters of pipelines and update watershed basin plans to account for increased growth.
- Pipeline or Manhole Failure – An emergency pipe repair is required to replace the defective or collapsed pipe. Necessary containment and diversion procedures will be in place until the appropriate repairs are completed and bypass pumping methods may be used until the pipe or manhole is repaired or replaced.
- Pump Station Failure – Bypass pumping methods may be used until the mechanical, electrical, instrumentation, or other needed repairs are completed at the pump station, unless there is adequate capacity in the wetwell or in-system storage to contain the wastewater flow into the station. In the event of lost electrical power service to a pump station, the Department has a portable generator and portable diesel pumps available to provide temporary power in addition to permanent generators or bypass hookups at 24 stations.

4.9 Overflow/Release Clean-up

The extent of the cleanup and the methods for cleaning will vary. Methods to be used include vacuuming or other removal of spillage, use of disinfectant in isolated areas, flushing, and other

measures to disinfect and/or remove the residual from the areas which are potentially contaminated by wastewater.

4.9.1 Common Clean-up Practices

The Technicians employ common practices as appropriate to an individual cleanup situation, including the following:

- Manual Practices – Manual cleanup techniques include the use of tools like rakes, shovels, brooms, etc., to remove all identifiable material originating from the overflow.
- Disinfection Practices – Apply lime or other disinfectant agents.
- Mechanical Practices – Mechanical clean-up techniques utilize a vacuum truck, valve exerciser machine/truck to clean off surfaces

One or more of the practices may be required, depending on the size and duration of the overflow/release and the area impacted.

4.10 Conduct Follow-Up Inspection

After remediation, the Assistant Superintendent follows-up with an inspection to ensure the overflow/release, determined to be the City's cause, has been adequately cleaned. The follow-up inspection will begin immediately after clean-up and remediation has ceased (or the following business day) and will be completed within five days of the initial event. On a multi day event…. Follow-up action also includes an evaluation of further repair work or program scheduling, as necessary, to minimize or eliminate the occurrence in the future. In many cases, the Pretreatment Coordinator will follow-up on overflow/release locations attributed to grease blockages with additional inspections or notices of violations.

Follow-up inspection will also include the use of appropriate technologies such as CCTV or SL-RAT, and if it is determined that cleaning the line is required on a more frequent basis (i.e. low-flow, other debris, etc.), the section of line will be added to the maintenance cleaning schedule. Maintenance will be performed on a routine schedule, potentially adjusted in frequency based on the severity of the blockage.

Additional short- and long-term response are determined after the follow-up inspection and are discussed in Sections 5 and 6.

4.11 Building/Private Property Backups

Events causing backups into buildings or sewer overflows entering a private building require additional investigations to determine if the backup is a result of a problem in the City's system or the result of failure on the customer's service line. To determine responsibility for a backup, the Technician will need to determine the location of the cause of the backup. If the investigation process does not reveal a problem in the City's system, the Department will advise the customer the backup is their responsibility.

The Department addresses backups into buildings/private property as a result of a backup from the City's collection system by:

- Responding to the scene and evaluating the situation;

- Taking appropriate action to limit exposure of the public;
- Evaluating responsibility for system failure or backup;
- Making repairs and/or performing system maintenance in the Department's collection system, if the backup is the result of a problem in the City's system.

The Technician will initially inspect the customer's cleanout, if accessible, to determine if the blockage is between the cleanout and the City's mainline. Section 4.2.1 discusses if a clean-out is located on the property, however if a clean-out cannot be located the following steps are followed to determine the cause.

1. Clean the main.
2. Determine if the back-up is throughout the entire property, i.e. is it only occurring in a single plumbing fixture or throughout the house. In most cases this is addressed by verbally speaking with the homeowner. The homeowner is advised to stop using water to prevent any continuing backup issue (public or private).
3. If the backup is occurring throughout the entire property, crews will clean the main public sewer line to see if that clears the blockage.
4. If cleaning the main line doesn't resolve the backup, CCTV crews are dispatched to evaluate the service from the main line to determine the point of the blockage.
5. If both the cleaning crew and the CCTV crew are unsuccessful at clearing the blockage and:
    a. The call is during regular working hours, an emergency utility locate is called into 811 and service repair crews are dispatched to the address to install a clean out at the property line to further determine public or private responsibility.
    b. The call is after regular working hours and a plumber hasn't inspected the property, the Assistant Superintendent advises the customer to call a plumber to see if they can clear the blockage. If it is determined the blockage was on the City's side, WMD will pay for the plumber's cost through direct billing. This method helps us expedite the process if the customer is agreeable to this approach.
    c. The call is after regular working hours and a plumber has been called to inspect the property, an emergency utility locate is called into 811 and service crews are dispatched to the address to install a clean-out at the property line to further determine public or private responsibility. If the responsibility is determined to be private, WMD advises the customer to retain a plumber to continue the investigation.
6. If it is determined the blockage is on the public side of the service line, service crews will clear or replace the City side of the service.
7. If damage (other than the plumbing bill) is received by the customer, they are advised to submit a claim to the City of Franklin Risk Management offices for further investigation by the City's insurance company.

4.11.1 Measures to Eliminate Building/Private Property Backups

Wastewater backups that are a result of a structural problem within the City's system may require an on-going cleaning program to prevent future private property backups, until some date in the future when the problem can be eliminated. These problem areas are identified and placed on a list for routine cleaning. Program supervisors are responsible for managing this list and will schedule personnel

to clean these areas on a scheduled basis. The typical method used by the Department in cleaning sewer lines is through the use of jet trucks, either operated by the City or its contractors.

4.12 Regulatory Reporting

Upon the occurrence of an overflow/release, the City will perform the appropriate notification per the existing NPDES permit. The City will provide phone notification or an emailed report within 24-hours after the time an overflow/release is observed. This timeframe may be before the initial determination is made if the overflow/release is the City's responsibility (public vs. private backup). In the case an initial report is made that is later determined not to be the City's responsibility, a follow-up email will be sent outlining why the overflow/release is not public. This initial email will include the date and time the initial call was received and the suspected location of the overflow/release. Minimal details may be provided in the report due to the initial nature and ongoing assessment of the location.

Within five days of the initial event, a more detailed report will be sent to the TDEC Nashville Environmental Field Office that will summarize the following. An example can also be seen in **Appendix D**.

- Date
- Time & duration of event
- Location by nearest intersection or other known landmark
- Estimated volume
- Activities undertaken during reporting period to correct overflow/release points
- Activities undertaken to prevent future or possible overflows/releases from occurring in the future
- Identified cause of blockage
- Ultimate destination of overflow/release

The report will be sent to:

Ann Rochelle (ann.rochelle@tn.gov)
TDEC – Nashville Environmental Field Office
711 R.S. Gass Boulevard
Nashville, TN 37243

4.12.1 City of Franklin Website (www.franklintn.gov)

The City will also host an updated listing of overflows on it's website to provide the public education as to the effect of adding foreign debris into the sewer system.

The website listing will be updated within two business days of the initial event determined to be caused by public infrastructure. Limited details will be provided with this initial update as the investigation may still be ongoing.

Once a month, the City will post a more detailed summary of the overflows/releases that will include the date, time and duration of the event, location by nearest intersection or other known landmark, estimated volume, status of clean-up, and the identified cause of the blockage, if determined.

4.13 Sewer Overflow Tracking and Identification

Overflows and releases are tracked in a GIS layer in the City's GIS system. From this spatial view, the WMD's management team can determine clusters or frequencies of overflows/releases that may warrant scheduled cleaning, additional flow meter investigations or capital expenditures.

Work orders or service requests created from an overflow/release are kept within the Infor system indefinitely and pictures collected by the Technicians are saved for a period of five years unless litigation or other necessary holds exist.

Section 5
Long-term Response

5.0 SORP Training Component

All employees involved in responding to an overflow/release will have annual training to maintain consistency with this SORP. Personnel from all levels of the WMD will be involved in this training to create a consistent reporting procedure and effective response to each incident.

These training sessions will be organized based on the latest revision of the SORP, as well as other reference materials (i.e. vacuum-truck training, maintenance, etc.). Training components may be supplemented with a practical hands-on field component to create consistency among all response personnel.

5.1 Long-term Response to Overflows/Releases

Long-term actions are critical in order to prevent the reoccurrence of an overflow/release at a specific location. There are three critical questions that will be answered during the long-term response phase to prevent the recurrence of a SSO, as shown in **Appendix E**, and identified below:

1. Is a consultant required to evaluate the cause of the SSO and identify appropriate long-term corrective actions? If yes, the Wastewater Collection Assistant Superintendent will process the request. If no, the Wastewater Collection Assistant Superintendent will require the location to be monitored for future overflows by internal staff.
2. Is the basic cause of the SSO capacity related? If yes, the Director will authorize a capacity evaluation to determine the appropriate solution. If no, the modifications required to the collection system to eliminate the hydraulic restriction will be determined or the basic root cause of the blockages defined and corrected.
3. Will more frequent cleaning eliminate the cause or prevent future overflows? If yes, the Wastewater Collection Assistant Superintendent will shorten time between cleanings and place the area on a regular preventive maintenance list. If no, the Wastewater Collection Assistant Superintendent will retain the cleaning schedule, but monitor the location.

5.2 Reporting

The City will maintain all SSO reporting records for a minimum of 5 years from the date of the SSO. All records documenting the steps taken to prevent the SSO from reoccurring, including work orders associated with the investigation and repair activities will be maintained. The City will also maintain a description of the complaints from customers or others regarding SSOs for a minimum of a 5-year period. Infor longer.

Section 6
Contact Information and References

Name/Entity	Title	Office Phone
Customer Service	NA	615-794-4554
After Hours Customer Service	NA	615-791-3260
Harvey Smithson	Service Division Superintendent	615-794-4554
JR Lee	Service Division Assistant Superintendent	615-794-4554
Brad Furline	Service Division Assistant Superintendent	615-794-4554
Juan Davis	Water Reclamation Superintendent	615-791-3240
Juan Thurber	Water Reclamation Assistant Superintendent	615-791-3240
Mark Hilty	Director	615-794-4554
Michelle Hatcher	Assistant Director	615-794-4554
Brian Goodwin		
Rick McPeak	Assistant Director	615-794-4554
Ann Rochelle	TDEC – Nashville Environmental Field Office	615-687-7000
Williamson County Health Department	NA	615-794-1542
Health Department - Regional Office: Mid-Cumberland	NA	615-650-7000
City of Franklin Fire Department	Non Emergencies	615-794-3411
City of Franklin Fire Department	Emergencies	911

The City of Franklin Sanitary Sewer Overflow Response Web Page contains information related to overflows and releases and includes a link to the City's NPDES Permit, this document and other useful information. The link to this page is below.

http://www.franklintn.gov/government/water-management-department/sanitary-sewer-overflow-response