



City of Placerville

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March 9, 2023

Ms. Xuan Luo, Ph.D., P.E.
Senior Water Resource Control Engineer
Central Valley Regional Water Quality Control Board
NPDES Compliance and Enforcement Unit
11020 Sun Center Drive #200
Rancho Cordova, CA 95670
Email: Xuan.Luo@waterboards.ca.gov

Via Email Only

Subject: Response to February 9, 2023 SMR Review and NOV for the Hangtown Creek Water Reclamation Facility, City of Placerville, El Dorado County

Dear Ms. Luo:

The City of Placerville Hangtown Creek Water Reclamation Facility (City) is in receipt of your letter dated February 9, 2023, with the subject: *SELF-MONITORING REPORT REVIEW AND NOTICE OF VIOLATION, CITY OF PLACERVILLE, HANGTOWN CREEK WATER RECLAMATION FACILITY, EL DORADO COUNTY*. The City appreciates your letter and the recognition of the intense storm event experienced on December 31, 2022, which has been identified as a 350 year storm event. That event ensued a local, county, state, and ultimately federal declarations of emergency that have continued to carry impacts into 2023.

Response to Violations Listed in Subject Letter

As required action stated in the letter, a response by March 10, 2023 is necessary to encourage and guide the City of Placerville to take reasonable measures to identify and remedy sources of stormwater into the sanitary sewer collection system. Below is our initial response to the items identified in your letter:

- a. *Steps Discharger will take to investigate and identify sources of stormwater to the sanitary sewer collection system:*

A. Capital Improvement Projects: With passage of Measures H and L by the voters of Placerville, the City has developed an extensive and fully funded Capital Improvement Program (CIP) project list. The current CIP list contains over 115 projects with anticipated additional 15-20 projects as part of the City's development in its Fiscal Year 2023/2024 CIP project list. Of this list, over 58% of the projects specifically include assessment of the City's sewer collection system and plans for replacement. Several of the more notable projects are for existing and dated sewer facilities that are located within either Hangtown Creek or tributary creeks such as Randolph Creek and Cedar Ravine Creek, a total of 3 large



projects with a combined construction value of \$7.3 Million. We believe that these systems are a major contributing source of inflow and infiltration (I&I) into the City's sewer system. The 2 largest projects of the 3 creek sewer projects are already underway with planning and environmental clearance. The 3rd creek project will start planning and environmental clearance this summer.

i. **Discharger Action Step:** *The City of Placerville will provide the RWQCB with:*

1. *A current list of CIP projects*
2. *A 5-year CIP delivery plan*
3. *A summary of the recently completed sewer collection system improvement projects as direct-action steps taken by the City to reduce inflow and infiltration into the collection system.*

B. Utility Assessment and Replacement Statement of Procedures: The City has already begun the framework to developing a utility assessment statement of procedures (SOP) for all existing and future CIP projects. This SOP will approach projects with the conservative mindset that all facilities and their serviceable integrity are evaluated through CCTV and visual inspections include sewer system improvements to be a part of the project scope from the very beginning. The SOP will also identify any facilities older than 40 years old will immediately be considered for lining or replacement. This will not just be for the pipes themselves, but inspections of manhole structures as well.

i. **Discharger Action Step:** *The City of Placerville will provide a copy of the Project Utility Assessment Statement of Procedures for Capital Improvement Projects.*

C. Privately Owned Sewer Laterals: The City of Placerville contains an extensive network of private sewer connections and laterals that ultimately reach the City's publicly owned sewer collection system. These private systems have been identified as another major source of I&I into the public system. City staff is working on the development of a Private Sewer Lateral Ordinance that will require property owners to video inspect their private sewer services and connecting laterals prior to sale of a property. This will ensure that properties will be assessed for I&I, allowing for adequate repair and/or replacement of potentially problematic pipes that are out of the City's maintainable jurisdiction. Codifying it through ordinance will give the City the ability to enforce more effectively said requirements.

i. **Discharger Action Step:** *The City of Placerville will complete the development of the Private Sewer Lateral Ordinance for approval and adoption by the City Council prior to the final report deadline of August 10, 2023*

b. *The schedule the Discharger will follow to complete these steps by the submittal date of the final report due August 10, 2023:*

A. The City will complete the aforementioned action steps in advance of the August 10, 2023 deadline for the final report.



The City would like to thank you for your encouragement in helping us further identify sources of I&I for the preservation of our Water Reclamation Facility and our natural environment of Hangtown Creek. Please feel free to contact me at mneves@cityofplacerville.org or our WRF Supervisor, Mark Liebenow, at mliebenow@cityofplacerville.org if you have any questions or concerns.

Best Regards,

A handwritten signature in blue ink that reads "Rebecca Neves".

Rebecca Neves, P.E.
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