

SANITARY SEWER MAINTENANCE POLICY OVERVIEW

The following are components of a basic sanitary sewer maintenance policy:

1. Purpose

The purpose of a sanitary sewer maintenance policy should include written intent to provide effective/efficient maintenance by evaluating political, social, safety, and economic concerns, among other things. The purpose may also state the procedures identified in the policy are intended to maintain the sanitary sewer system to prevent sewer backups. A policy, when implemented, may also extend the service life of various components of the sanitary sewer system.

To ensure flexibility within the policy, it is important to clarify that the timelines and procedures in this policy are goals. While the Utility should make a good faith effort to meet the guidelines in the policy, it is a good practice to note there may be times when procedures are not going to be completed within established timeframes. Perhaps include examples of circumstances that may prevent the Utility from meeting one or more goals stated in the policy – things like budget constraints, critical equipment failure, or weather and other emergencies.

The purpose should indicate who at the Utility has the authority to override provisions of this policy (e.g., public works director, utility superintendent, administrator, the Utility Council, etc.). Such exceptions to the policy should only occur on an infrequent and temporary basis. In the event that policy overrides are necessary on a recurring schedule, the Utility should re-evaluate the policy.

If the Utility does not intend to maintain the entire sanitary sewer system on its own, the policy should be used as a guide for the services to be provided by a contractor or another party.

2. Routine Maintenance and Inspection

This section of the policy should clearly define those parts of the sanitary sewer system for which the Utility is responsible and those parts of the sanitary sewer system for which another party (property owner, etc.) is responsible. Identify who is responsible for maintenance of sewer mains, connections, private sewer lines, etc.

It is important to develop a regular schedule of maintenance and inspection for your Utility's sanitary sewer system. When determining a schedule, remember that in the event of a sanitary sewer backup, the Utility will be liable if it was negligent and it will be considered negligent if the Utility's actions weren't reasonable. Unfortunately, no definition of "standard of reasonableness" exists in state law, federal law or case law.

One method of establishing the "standard of reasonableness" in a Utility is to periodically survey neighboring or similar utilities and find the timeline on which they maintain sanitary sewer mains. If your Utility has a maintenance schedule similar to those of utilities in your area, you would likely be considered reasonable for purposes of sanitary sewer maintenance.

Keep in mind that this method of establishing “reasonableness” addresses problem areas or special needs within a sanitary sewer system. If a Utility knows of sanitary sewer components that need more frequent servicing than provided for in the maintenance policy, it should act on that knowledge. Once the Utility has knowledge of a need for increased maintenance, it is unlikely to be considered reasonable if that need is ignored. However, in the shorter term the Utility might be protected by sovereign immunity if the Utility knows of a situation and clearly documents the factors weighed in determining not to act on a long-term solution immediately.

Some parts of the system will need more maintenance and other parts may need less maintenance than provided for in the routine maintenance schedule for most of the sanitary sewer system. One way to accomplish this is to use a map or schedule noting system components that receive ordinary routine maintenance on a fixed schedule as Category 1. System components needing less frequent maintenance could be Category 2 and those components needing more frequent maintenance could be Category 3.

When a sewer main or facility is identified as anything other than Category 1, the reasons why maintenance is needed on a different schedule should be documented. In addition, the policy should note who is responsible for assigning the appropriate maintenance categories to the various system components. Such determinations should be assessed periodically in the event that sewer mains and facilities need to be moved from one category to another.

Depending on Utility resources, the sanitary sewer maintenance schedule within the policy may include some, all or more than the following:

- Sanitary sewer collection system
- Clean sanitary sewer collection system with jetter
- Clean sanitary sewer collection system with rodder
- Attach proofer to show sanitary sewer collection systems are clear
- Inspect sanitary sewer collection systems by looking down manholes
- Televise sanitary sewer collection systems
- Root removal in areas with many trees and root problems
- Document all activities
- Other (describe your Utility’s method of cleaning sanitary sewer mains)
- Identify problem areas/components
- Lift Stations
- Easy availability of original manuals with manufacturers’ recommended maintenance schedules for all lift station equipment
- Operating procedures for manipulating pump operations (manually or automatically) during wet weather to increase in-line storage of wet weather flows
- Setting wet well operating levels to limit pump start/stops
- Cleaning wet well
- Calibrating flow meters or conducting draw down tests
- Regular rotation of lead, lag, and backup pumps
- Regular inspections of lift station, alarm systems and electrical components
- Maintenance of operation logs and general records for all lift station activities, including inspections
- Clean force mains

- Force main valve exercising
- Identify problem areas/components

Maintenance schedules developed for the above sewer main and lift station activities should clearly note when and/or how often each activity will take place.

3. Problem Areas

- Have a system to designate problem components or areas (e.g. history of back-ups, known roots or grease, off-set in sanitary sewer main connection)
- Clearly define actions (Once a problem area is identified, what is done to address the issue and minimize the likelihood of future sanitary sewer backups?)
- Maintain those areas more often than the regular schedule
- Keep a list of problem areas and a process to indicate when an area may no longer be considered a problem
- Document all activities
- Identify likely sources of prohibited discharge (e.g., food processing plants, commercial and industrial, health care facilities, schools and daycares, and correctional facilities)

4. Personnel Responsibilities and Requirements

This section should identify the employee(s) the Utility wants to exercise discretion in decision making and define when and how the Utility wants them to do it. This will increase the odds that statutory sovereign immunity will apply to both the written policy and decisions made by employees when the written policy confers decision making authority to those employees.

Also use this section to clarify any personnel policy provisions that are specific to the responsibilities associated with maintenance and inspection of the sanitary sewer system.

Address employee training on routine maintenance, proper use of equipment, and emergency response procedures.

Many utilities establish general work hour requirements in personnel policies and/or union contracts. However, those utilities without documented work hour expectations may want to use this section to set forth expectations for employees who will be responsible for sanitary sewer maintenance. In doing so it is important to include language that allows the Utility to be flexible depending on circumstances. Be aware of wage and hour laws so provisions in this policy do not contradict state or federal law.

Note that routine sanitary sewer maintenance operations will only be conducted when weather conditions do not threaten the safety of employees or equipment.

5. Documentation

- Develop procedures that are flexible and realistic.
- Train employees on why records are important and how to complete appropriate records. Consider using model forms developed by FRWA.
- Keep records of all Utility actions regarding the inspection and maintenance activities, including: (1) daily logs of employees' actions, (2) scheduled maintenance activities, and (3) emergency response activities.
- Retain records for a minimum of five years or in accordance with utility policies (ask utility attorney).
- Retain records of televised mains for at least five years or in accordance with utility policies (ask utility attorney).

6. Other Documents

There are a number of other written documents important to the Utility's sanitary sewer system that should be developed separate from the Sanitary Sewer Maintenance Policy. These include, but are not limited to, the following:

- Emergency Response Policy
- Public Sanitary Sewer Use Ordinance
- System Rehabilitation Policy