



Monterey Regional Water Pollution Control Agency

*"Dedicated to meeting the wastewater and reclamation needs
of our member agencies, while protecting the environment."*

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July 25, 2016

Honorable Mark E. Hood
Presiding Judge of the Superior Court
240 Church Street
Salinas, CA 93901

Re: 2015-2016 Monterey County Civil Grand Jury Final Report – "Pacific Grove Sewage Spill"

Dear Honorable Mark E. Hood:

Thank you for the opportunity to review and comment on the 2015-2016 Monterey County Civil Grand Jury Final Report – "Pacific Grove Sewage Spill." Please find the Monterey Regional Water Pollution Control Agency's (MRWPCA) responses to Findings F1 through F4 and Recommendation R1.

Finding F1: MRWPCA is responsible for the May 18, 2015, sanitary sewer overflow at Fountain Avenue, Pacific Grove. They own and operate said pump station, and were making repairs there when the overflow occurred.

The MRWPCA agrees the Agency owns and operates the pump station at Fountain Avenue, Pacific Grove and that the sanitary sewer overflow occurred as a result of the Agency's efforts to make repairs to the station on May 18, 2015.

Finding F2: MRWPCA did not have a procedure to address potential false pressure readings during valve maintenance on May 18, 2015.

MRWPCA agrees there was not a specific procedure in place to address potential false pressure readings. More importantly, in this situation, staff did not have a procedure to identify that an isolation valve did not properly close and the piping was still pressurized. Procedures to address this issue have been implemented (see response to R1 below).

Joint Powers Authority Member Entities:

Boronda County Sanitation District, Castroville Community Services District, County of Monterey, Del Rey Oaks, Fort Ord, Marina Coast Water District, Monterey, Moss Landing County Sanitation District, Pacific Grove, Salinas, Sand City, and Seaside.

Finding F3: Diverting the SSO into the Monterey Bay prevented a costlier and hazardous uncontrolled overflow. MRWPCA's response in dealing with the May 18 SSO was appropriate given the alternative.

MRWPCA agrees that the response was appropriate to prevent a costlier and potentially more hazardous situation given the alternative. Sewage was going to be released from the station and reach the Monterey Bay regardless. Had the level been allowed to continue to rise, sewage would have inundated all electrical equipment and overflowed the top of the station and flowed across the Recreational Trail into the Bay uncontrolled rather than through the overflow line. This would have created a much larger, more difficult clean up and represented a potentially greater risk to public health. In addition, allowing the upper level of the Station to flood would have damaged additional electrical equipment delaying restoring the station to service and substantially increasing the cost of repairs without reducing potential environmental impacts.

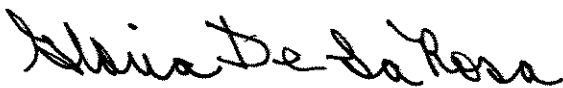
Finding F4: The condition of PG owned sewer infrastructure was unrelated to the circumstances of the SSO on May 18, 2015.

MRWPCA agrees the condition of PG sewer infrastructure was unrelated to the overflow. All infrastructure involved in the May 18 SSO is owned and operated by MRWPCA.

Recommendation R1: MRWPCA implement staff training to account for and manage situations of false equipment readings.

The recommendation has been implemented. Staff has been educated on the importance of verifying proper isolation of flows and pressures prior to opening any piping or pumping systems. For example staff has been instructed to loosen, but not to remove, all bolts on a cover or piping flange prior to separating the mating surfaces. In the event that pressure or flow remains as a result of a faulty isolation valve, the bolts remaining can be secured to minimize any spills as a result. In addition, MRWPCA's Maintenance Department has implemented a requirement for the development and approval of a written plan, prior to any work that requires opening any piping or pumping systems. This plan must include steps to verify proper isolation of flows and pressure.

Sincerely,



Gloria De La Rosa
Chair MRWPCA Board of Directors