

Draft SSO Response Plan

Chinle, Kayenta, and Tuba City Wastewater Treatment Plants

Navajo Tribal Utility Authority

SSO RESPONSE PLAN

For the

NAVAJO TRIBAL UTILITY AUTHORITY

Chinle Wastewater Treatment Plant-NPDES Permit No. NN0020265

1.75 Miles North of the Chinle District Office

Chinle, Arizona 86503

Kayenta Wastewater Treatment Plant-NPDES Permit No. NN0020281

3.0 Miles Northeast of Junction US 160 & US 163

Kayenta, Arizona 86033

Tuba City Wastewater Treatment Plant-NPDES Permit No. NN0020290

5 miles Southwest of SR 264 and US 160

Tuba City, Arizona 86045

Date: March 11, 2024

	Date	Reviser/Reviewer	Responsible Official
	Revised/Reviewed	Signature and Title	Signature and Title
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Administrative Procedures

The SSO Response Plan shall be kept at Chinle, Kayenta, and Chinle Wastewater Treatment Plants. Training for any personnel required to implement the SSO Response Plan shall be provided by NTUA Water/Wastewater Department annually. Should significant revisions be made to the SSO Response Plan, training regarding the revisions shall be conducted as soon as possible and then annually. All training dates and locations shall be recorded below.

Training Date	Training Location	Description
Annually	HQ- Corporate Building	SSORP Overview.

Responsibility Information

Contact List

Title	Name	Primary Phone	Email
Primary SSO Coordinator	Wendell Murphy	Wendell Murphy (928) 729-4719 Wendell Murphy	
Secondary SSO Coordinator	David White	(928) 729-6268	Davidw@ntua.com
Primary SSO Responders	District Contacts	See below	See below
Secondary SSO Responders	District Contacts	See below	See below
Primary SSO Support	Clint Ahasteen	(928) 729-6753	Clinta@ntua.com
Secondary SSO Support	Reynelda Terry	(928) 729-6342	ReyneldaT@ntua.com
NTUA Utility Operations Center (UOC)	HQ EISD	1(800) 528-5011	
Primary Lab Responder	Raquel Whitehorse (928) 729-6239		raquelw@ntua.com
Alternate Lab Responder	Sherwin Curley	urley (928) 729-6242 SherwinC@	
Others	Technical Assistant (Vacant)	(928) 729-6208	N/A
	District Contacts - Ch	inle	
Primary SSO Responder, Superintendent	Chinle Field Superintendent (Vacant)		
Secondary SSO Responder, District Manager	Gary Monroe	(928) 729-4781	GaryM@ntua.com
	District Contacts - Kaye	enta	
Primary SSO Responder, Superintendent	Melissa Parrish	(928) 729-4770	MelissaP@ntua.com
Secondary SSO Responder, District Manager	Vircynthia Charley (928) 729-4763		VircynthiaC@ntua.com
District Contacts - Tuba City			
Primary SSO Responder, Superintendent	Chester Whiterock	(928) 729-4409	ChesterW@ntua.com
Secondary SSO Responder, District Manager	Alicia Richards	(928) 729-6104	AliciaR@ntua.com

Responsibility Descriptions

Wendell Murphy, Primary SSO Coordinator and Alternate NPDES Contact Person

Responsible for determinations concerning who to contact within the NTUA District during an SSO to coordinate the local response. Also, responsible for ensuring immediate local actions are undertaken and completed for assessing the SSO and initiating a series of response actions based on the type, severity, and expected destination of the SSO. Lead during confirmed SSO events. Responsible for providing notifications to the local health department, the public, and other affected entities such as operators of public water systems depending on the severity of the SSO event. Responsible for providing notifications and reporting of SSO to USEPA and NNEPA as required by the NPDES permits. Responsible for coordinating with NTUA Public Relations to provide notifications to the public and to address public inquiries, as needed.

David White, Secondary SSO Coordinator

In the absence of the Primary SSO Coordinator, the Secondary SSO Coordinator is responsible for the Primary SSO Coordinator's duties.

District Superintendents, Primary SSO Responder

Responsible for assessing the SSO and initiating a series of response actions based on the type, severity, and expected destination of the SSO. Responsible for organizing crews for response and for keeping Primary SSO Coordinator updated through completion of response actions. Responsible for local management of decision-making for the sewer collection system. Responsible for relaying public inquiries to Primary SSO Coordinator.

District Managers, Secondary SSO Responders

In the absence of the Primary SSO Responder, the Secondary SSO Responder is responsible for the Primary SSO Responder's duties.

Clint Ahasteen, Primary SSO Support

Responsible for providing technical assistance to Primary SSO Responder. Ensures SSO response is undertaken and completed in accordance with NTUA operations and safety policies and procedures.

Reynelda Terry, Secondary SSO Support

In the absence of the Primary SSO Responder, the Secondary SSO Coordinator is responsible for the Primary SSO Responder's duties.

Raquel Whitehorse, Primary Lab Responder

Responsible for sample collection and data analysis as called upon by the SSO Coordinator.

Sherwin Curley, Alternate Lab Responder

In the absence of the Primary Lab Responder, the Alternate Lab Responder is responsible for the Primary Lab Responder's duties.

Rotating Personnel, Responder

Certified wastewater operator. Responsible for responding to reports of a possible SSO during normal business hours. First to arrive at the site to confirm if the report is an SSO event. Assesses the situation and reports back to the Primary SSO Responder. Addresses the reported event as instructed by the Primary SSO Responder. Upon a confirmed SSO event, serves as part of the organized crew to address the SSO event as described in SSO Response Procedures.

Rotating Personnel, On Call Responder

Outside of normal business hours, performs the work of the Responder.

Navajo Engineering and Construction Enterprise (NECA)

NECA may be called to assist when the scope of work exceeds NTUA's maintenance capabilities and timeframes.

Important Contact Information

Contact List

Title	Name	Primary Phone	Email
Navajo Tribal Utility Authority	Report an Outage	(800) 528-5011	
NTUA HQ Water Dept	Wendell Murphy	(928) 729-4719	
NNEPA	Patrick Antonio	(928) 871-7185	patrickantonio@navajo -nsn.gov
USEPA		415-947-4222	N9NPDES@epa.gov
NECA	Ammerson Barber	(505) 210-7022	ammerson@navajo.net
	Chinle		
Medical: Chinle IHS	Peter Littlehat	(928) 781-3825	
Fire Department	Chinle Fire Department	(928) 674-2105	
Police Department	Chinle Police Department	(928) 674-2111	
	Kayenta		
Fire Department	Kayenta Fire Department	(928) 697-3350	
Police Department	Navajo Nation Police Department	(928) 697-5600	
Medical: Kayenta Health Center	KHC Switchboard	(928) 697-4000	
	Tuba City		
Tuba City Fire Lieutenant	Gilbert Edgewater III	(928) 283-3007	gedgewateriii@navajo0 nsn.gov
Tuba City Police Lieutenant	ranian Ininn		fjthinn@navajo-nsn.gov
Medical: Tuba City Regional Health Care Corporation	TCRHCC	(866) 976-5941	

Response to Notification of SSOs

NTUA has adopted service call/overflow response procedures requiring immediate response to minimize or eliminate an overflow.

When a notification of an SSO is received, the following should be communicated to the caller: who within NTUA will respond, the estimated time of arrival, and what areas will need to be accessed. The information provided by the caller should be verified by the Responder/On Call Responder before dispatching a field crew.

Public Observation of an SSO

Public observation is typically the most common way a Utility is notified of blockages and spills. Contact information for reporting sewer spills and backups is as follows:

Website: https://www.ntua.com/contact-us.html
Primary Telephone Number (NTUA Contact Center): 1-800-528-5011 alt: 928-729-5721
Outside Normal Working Hours (NTUA Utility Operation Center): 1-800-528-5011 alt: 928-729-5721

Information Required from the Public

At a minimum, the date and time of observation and location of the SSO should be obtained from the public, along with their contact information, if possible.

Normal Working Hours

The regular working hours for NTUA employees are Monday through Friday from 8:00 a.m. to 5:00 p.m., except holidays. When a report of a sewer spill and backup is reported, the responsible District Primary SSO Responder is notified, and the District Responder is dispatched to the site. When a sewer spill or backup report is confirmed by the Responder, the Primary SSO Responder notifies the Primary SSO Coordinator, who initiates the response actions. The Primary SSO Responder assembles a crew and supervises response actions. If the Primary SSO Coordinator/Responder is unavailable, the Secondary SSO Coordinator/Responder will fulfill the Primary SSO Coordinator/Responder role.

Outside Normal Working Hours

Outside normal working hours, calls are automatically routed to the NTUA Utility Operation Center (UOC) via the NTUA Contact Center, which records the information required from the public and then notifies the District Primary SSO Responder, who dispatches the District On Call Responder. When a sewer spill or backup report is confirmed by the On Call Responder, the Primary SSO Responder notifies the Primary SSO Coordinator, who initiates the response action. The Primary SSO Responder assembles a crew and supervises response actions. If the Primary SSO Coordinator/Responder is unavailable, the Secondary SSO Coordinator/Responder will fulfill the Primary SSO Coordinator/Responder role.

SCADA Alarms

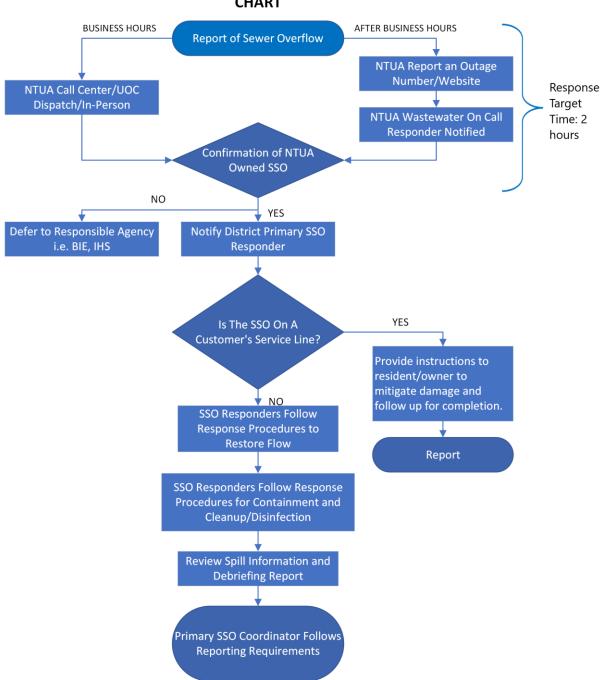
There is no SCADA at the Chinle, Kayenta and Tuba City WWTF's.

Staff Observation of an SSO

Field crews and contractors perform periodic work on sewer system facilities. Any SSOs noted within or coming from NTUA sewer system facilities must be reported immediately to the District SSO Responder, who will notify the Primary SSO Coordinator.

Notification and Response

NAVAJO TRIBAL UTILITY AUTHORITY SANITARY SEWER OVERFLOW NOTIFICATION & RESPONSE FLOW CHART



SSO Response Procedures

Customer Relations

As a representative of the NTUA, you will occasionally have to deal with an agitated homeowner. A sewer backup can be a stressful event, and even a reasonable homeowner can become upset if it is perceived that NTUA staff members are indifferent, uncaring, unresponsive, and/or incompetent.

Although sometimes difficult, effective management of a sewage backup situation is critical. If it is not managed well, the problem can end up in a costly, prolonged process with the homeowner. The homeowner should feel assured that NTUA is responsive, and the homeowner's best interest is a top priority.

Employees need to communicate effectively with customers, especially in sewage backup situations. How we communicate is how we are perceived. Good communication with the homeowner results in greater confidence in our ability to address issues satisfactorily.

Here are a few communication tips:

- Give the homeowner ample time to explain the situation or express his/her frustration. Show interest in what the homeowner says, no matter how often you have heard it or how well you understand the problem.
- As soon as possible, let the customer know that you will determine the source of the issue and correct it as quickly as possible.
- Acknowledge the homeowner's concerns. For example, if the homeowner seems angry or worried about property damage, say, "I understand that you're concerned, but I can call my supervisor who will be able to answer your questions and note your concerns."
- Express understanding and empathy for any inconveniences caused by the incident, but do not admit
 fault.
- As much as possible, keep the homeowner informed on what is being done and what will be done to correct the problem.
- Keep focused on getting the job done in a very professional manner. Don't wander from the problem with too much unnecessary small talk with the homeowner.
- Don't find fault or lay blame on anyone.

Responder Priorities

The responder's priorities are:

- To follow safe work practices.
- To respond promptly with the appropriate equipment.
- To evaluate the cause(s) of the spill and determine responsibility.
- To restore the flow as soon as possible.
- To contain the spill whenever feasible.
- To minimize public access to and/or contact with the spilled sewage.
- To update the Primary SSO Coordinator.
 - o If the Primary SSO Coordinator cannot be reached, contact the Secondary SSO Coordinator.
- To return the spilled sewage to the sewer system, removed debris should be disposed of properly.
- To restore the area to its original condition (or as close as possible) and properly disinfect the area, if possible.

Responder Responsibilities

The Responder's responsibilities for an SSO at or from NTUA-owned facilities:

#1 Contain spilling sewage.

- Capture the sewage where it can be recovered and returned to the sewer system.
- Contain sewage in protective locations (i.e. flood control facilities, construction excavations, vacant lots, etc.)
- Deploy containment materials such as sand, sandbags, poly sheeting, socks, etc.

#2 Control the spill overflow and bypass area of failure

- Bypass the obstructed line by pumping the spillage into another non-restricted line or vacuum with equipment.
- Set up barricades to prevent public contact with spill

#3 Cleanup the affected areas to ensure public health and safety

- Remove all visible debris
- Wash down and contain run-off being careful not to wash sewage into storm drain system if applicable
- Determine whether to disinfect or not to disinfect
 - Consider requirements of other agencies
 - Consider impacts to receiving waters
 - Consider the uses and ownership of affected properties
- Clean all hard/soft surfaces

Safety

The Responder is responsible for following safety procedures at all times. Special safety precautions must be taken when performing sewer work. Responder must use the appropriate PPE (i.e. rubber gloves and boots, Tyvek suit, face shield, disinfectant supplies), equipment and tools (i.e. safety cones, manhole hooks, hand tools). Special consideration must be given to following all local traffic, confined spaces, and safety procedures as recommended in the NTUA Safety Manual.

Initial Response

All calls regarding an SSO require a response to the reported location of the SSO event to minimize or eliminate an overflow. The Responder must respond immediately after the initial notification. NTUA target time for SSO response is within 2 hours for any single event, however, no single response shall exceed 8 hours and on average response time must be less than 4 hours.

The Responder should determine appropriate response measures based on the circumstances and information provided by the caller (e.g., weather and traffic conditions, small backup vs. sewage flowing on the ground, etc.). Responders are also equipped with mobile tablets to assess the situation, take photographs, and expedite online form submittals. If additional help is needed, the Responder may contact the Primary SSO Responder who may bring in other employees, contractors, and/or equipment suppliers in consultation with the Primary SSO Coordinator.

Upon arrival at the site, the Responder should:

- Note the arrival time at the spill site.
- Verify the existence of a sewer system spill or backup.
- Verify the location with GPS coordinates and ensure that the affected facilities are part of the NTUA's sanitary sewer overflow reporting form.
- Identify and assess the affected area and the extent of the spill.
- Comply with all safety precautions (traffic, confined space, etc.) as specified in the NTUA Safety Manual.
- Contact the caller for more information if needed and if time permits.
- Notify the Primary SSO Responder if:
 - The spill appears to be significant, in a sensitive area, or there is doubt regarding the extent, impact, or how to proceed, or
 - Additional help is needed for line cleaning or repair, containment, recovery, sampling, and/or site cleanup.
- If the Primary SSO Responder cannot be reached, contact the Primary SSO Coordinator.
- It is recommended to document conditions upon arrival with photographs (given that the activity does not interfere with SSO recovery and cleanup). Assigned tablets should be used to take photographs.

Restore Flow

Upon arrival at the location of a spill into a house or a building, the Responder should evaluate and determine if the spill was caused by a blockage in the customer's lateral or the NTUA-owned sewer main, caused either by a backup in the sewer main line or nearby operation and maintenance (O&M) or construction activities.

- Suppose a blockage is found on a customer's lateral that the NTUA-owned sewer main did not cause. In that case, it should be communicated that it is not NTUA's responsibility to work on a private lateral. Recommend that the customer contact a qualified plumbing contractor to remove the blockage. Inform the customer that NTUA does not recommend a particular contractor but a list of contractors can be found on NTUA's website at https://www.ntua.com/assets/contractor-list--23dec27.pdf.
- If a blockage is found in a customer's lateral that was caused by the NTUA-owned sewer main remove the blockage caused by the NTUA-owned sewer main and restore flow.
- If a backup in the main line is found to have caused the SSO in a house or building, relieve the blockage in the main line.

The Responder should attempt to remove the blockage from the NTUA-owned sewer main and restore flow to the area. Using the appropriate cleaning tools, the field crew should set up downstream of the blockage and hydro-clean upstream from a clear maintenance hole. The flows should be observed to ensure the blockage does not reoccur downstream.

If the blockage cannot be cleared within a reasonable time, or the sewer requires construction repairs to restore flow, initiate containment and/or bypass pumping. Contact the Primary SSO Responder who may bring in other employees, contractors, and equipment suppliers in consultation with the Primary SSO Coordinator.

Lift Station or Force main Facilities

The responder to a potential lift station or force main failure should:

- Determine whether the flow can be restored within a reasonable time.
- If it appears that flow cannot be restored within a reasonable time or if the conveyance system facility requires construction and/or repairs, then employ contingency plans covering containment, bypass pumping, portable electric generators, contractual assistance, etc.

If assistance is required, immediately contact the Primary SSO Responder who may bring in other employees, contractors, and equipment suppliers as required.

Contain the Spill

The Responder should attempt to contain as much of the spilled sewage as possible using the following steps:

- Determine the immediate destination of the overflowing sewage.
- Contain/direct the spilled sewage using a dike/dam, sandbags, or other containment materials on hand.
- Pump around the blockage/pipe failure/lift station or vacuum flow from upstream of the blockage and dispose of downstream of the blockage to prevent further overflow. Pumps are available at the District and additional pumps are located at Headquarters (Fort Defiance, AZ).
- When an SSO occurs inside of a house or building, the property owner should be instructed to follow these guidelines:

- o Keep people and pets away from the affected area.
- Place towels, rags, blankets, etc., between areas that have been affected and areas that have not been affected.
- Do not remove any contaminated items.
- o Turn off the HVAC system.
- o Move any uncontaminated property away from the overflow area.
- NOTE: See the Water Quality Sampling requirements if an SSO reaches a water body.

SSO Public Notification and Restricted Public Access

Barriers shall be installed to prevent the public from having contact with the sewage if possible. Signage should be posted at the spill to keep vehicles and pedestrians away from contact with spilled sewage. Do not remove the signs until directed by the Primary SSO Coordinator or the NTUA Safety Supervisor or until the threat of human contact has ceased. A sample warning sign is included in Appendix A.

Recovery and Clean Up

The recovery and cleanup phase begins when the flow has been restored, and the spilled sewage has been contained to the extent possible.

Recovery of Spilled Sewage

Vacuum up or pump the spilled sewage and discharge it back into the sanitary sewer system.

Clean Up and Disinfection

Cleanup and disinfection procedures should be implemented to reduce potential human health issues and adverse environmental impacts associated with an SSO event. The procedures described are for dry weather conditions and should be modified as required for wet weather conditions.

Where cleanup is required inside a customer's property (e.g., backup into the house), as result of a backup caused by NTUA, the Primary SSO Coordinator will be contacted to arrange for a professional clean up.

Customers' Private Properties

Generally, spills inside houses or buildings should be cleaned up by a professional cleaning company at the owner's expense. NTUA is not responsible for spills caused by wastewater service lines located on customer's property. Unless the backup was caused by NTUA's main wastewater lines, NTUA is not responsible for any repairing, replacing, cleaning, maintaining, or servicing customer's wastewater service line that is connected to NTUA wastewater collection system.

Upon request, NTUA can provide the customer with a list of contractors who may assist if the source of sewer backup is on the customer's private line. The contractor list can also be found on NTUA's website at https://www.ntua.com/assets/contractor-list--23dec27.pdf. Please note that NTUA is merely providing this list of contractors and does not assume responsibility for work performed by said contractors, nor does it recommend any particular contractor.

Where cleanup is required inside a customer's house or building as result of a backup caused by NTUA, the Primary SSO Coordinator will be contacted to arrange for a professional clean up.

Hard Surface Areas

Collect all signs of sewage solids and sewage-related material using rakes and brooms.

- Take reasonable steps to contain and vacuum up the wastewater.
- Disinfect all areas that were contaminated from the overflow using the disinfectant solution of household bleach diluted 10:1 with water. Apply minimal amounts of the disinfectant solution using a hand sprayer. Disinfectant should be applied in such a manner as to prevent runoff. Document the volume and application method of disinfectant that was employed.
- Allow area to dry. Repeat the process if additional cleaning is required.

Landscaped and Unimproved Natural Vegetation

- Collect all signs of sewage solids and sewage-related material either by hand or with the use of rakes and brooms.
- Allow the area to dry. Repeat the process if additional cleaning is required.

Natural Waterways

Cleanup should proceed quickly in order to minimize SSO impacts to any creeks, gullies, or natural waterways. Any water used in the cleanup process should be de-chlorinated before use.

Wet Weather Modifications (where applicable)

Do not perform water quality sampling during heavy storm events with heavy runoff where water quality sampling would not provide meaningful results.

Water Quality Sampling Procedures

If NTUA determines the SSO has potential to contaminate the drinking water system, the Primary SSO Coordinator will contact the NTUA's Environmental & Compliance Laboratory to direct the collection of samples for analysis. The Responder as a certified wastewater operators will conduct the sampling by collecting samples in appropriate containers and packaging for transport to NTUA Lab for analysis.

NTUA Environmental Compliance & Laboratory Contact Information

Job Title	Primary Lab Contact	Primary Phone	Email
EC&L Supervisor	Raquel Whitehorse	(928) 729-6239	raquelw@ntua.com
Laboratory Supervisor	Sherwin Curley	(928) 729-6242	SherwinC@ntua.com

Estimate the Volume of Spilled Sewage

Use the methods outlined in Appendix C to estimate the volume of the spilled sewage. Wherever possible, the responder will document the estimated volume using photos of the SSO site before and during the recovery operation with the use of assigned mobile tablets.

Follow Up Activities

If sewage has reached the storm drain system, the combination sewer jet vacuum cleaning truck should vacuum/pump out the catch basin and any other portion of the storm drain that may contain sewage. Storm drains are present in Tuba City only at the school or hospital locations.

In the event that an overflow occurs at night, the location should be re-inspected first thing the following day. The operator should look for any signs of sewage solids and sewage-related material that may warrant additional cleanup activities.

SSO Event Debriefings

These SSO events provide opportunities to evaluate response and reporting procedures. After each SSO event, all participants, from the person who received the call to the last person to leave the site, may meet to review the procedures used and discuss what worked and where improvements could be made in responding to and mitigating future SSO events. The results of the SSO event debriefings must be documented in the NTUA Job Briefing Report, as shown in Appendix F, and tracked to ensure the action items are completed.

Claims for Backups into a Building

Backup into any customer's home/building will be reported to the Primary SSO Coordinator. If any claims are received the Primary SSO Coordinator must report such claim to the NTUA Legal Department for coordination with the Navajo Nation Risk Management Office.

Regulatory Notification

United States EPA and Navajo Nation EPA Notification Requirements

The Primary SSO Coordinator shall contact regulatory agencies within 24 hours of becoming aware of the confirmed SSO event by telephone call to:

United States Environmental Protection Agency Region 9:

• USEPA Telephone Number: (415) 947-4222

Navajo Nation Environmental Protection Agency

• NNEPA: (928) 871-7185

Public Notification Requirements

Feasible Methods of Public Notification Available depending on the severity of the SSO. The timing of the public notification will be determined by the Primary SSO Coordinator with the consultation of NNEPA and local authorities.

- Website and/or social media
 - The reported SSO will be placed on the NTUA website and Facebook page.
- Local print or radio and broadcast media
 - If the SSO is severe enough to do public harm, it will be announced on KTNN radio (928) 871-3553 or with door-to-door knocks or placement of door hangers.
- Preprinted Methods of Public Notification
 - o Printed flyers as shown in Appendix A
 - Warning Signs
 - o Door Hangers

Required Information to Include in Public Notifications

Minimum information to be included in public notifications by web, social media, or broadcast (if applicable) include: identification that an SSO has occurred, date, duration if known, estimated volume if known, location of the SSO by street address or other appropriate method, and anticipated direction of the SSO, cause(s), the potential for harm to public health or the environment, and steps NTUA is taking to mitigate harm.

Procedures for Determining the Appropriate Method(s) of Public Notification

Procedures for determining the appropriate public notification method(s) will be based on the potential for public exposure to health risks associated with the SSO. A low public health risk will prompt notification around the SSO event itself (i.e., deploy signage, traffic control, etc.). A high public health risk will prompt more interactive methods, like door-to-door notification and distribution of door hangers. Examples include:

Scenario 1: A spill occurs at a remote lift station. The spill is bad enough that waste escapes the enclosed area but does not reach surface water.

Public Health Risk: Low

Public Notification Method(s):

Immediately deploy signage around the spill.

Scenario 2: A major spill occurs during dry weather near a local water body that has the potential to be encountered and consumed by local livestock.

Public Health Risk: Very High

Public Notification Method(s):

- Immediately deploy safety barriers around the spill at locations where contact with public and livestock may occur.
- Immediately notify residents in area with door-to-door knocks and distribution of door hangers.

As soon as possible or within the 4 hours of response:

- Contact local authorities and Navajo Nation health department to discuss closure or barricading the area.
- Contact surrounding public water system officials about the spill if public water system downstream of spill.
- Provide press release to local radio KTNN.
- Publish press release to website.

An example warning sign is included in Appendix A of this template.

Point of Contact

The NTUA Public Affairs Department in coordination with the Primary SSO Coordinator shall be responsible for public notification via the media. The Primary SSO Coordinator shall be responsible for notification of other affected entities (such as local authorities and public water systems).

SSO Documentation and Reporting

All SSOs should be thoroughly investigated and documented to manage the sewer system and meet established reporting requirements.

Internal SSO Documentation

The Primary SSO Coordinator will ensure documentation for each individual SSO. The record will include information collected by the responder and notifications to regulatory agencies. The record should include the following information at a minimum:

- Initial service call information
- Checklist for Sanitary Sewer Overflow/By-pass Form (Appendix B)
- Volume estimation, including methods for estimating spill volumes and calculations
- Photographs
- Water quality sampling and test results, if applicable
- NTUA Job Briefing Form

External SSO Documentation

The Primary SSO Coordinator shall call or submit an email notification to the U.S Environment Protection Agency and the Navajo Nation Environmental Protection Agency (NNEPA) within 24 hours of NTUA personnel becoming aware of the SSO, as required by the NPDES permit. The Primary SSO Coordinator shall notify USEPA at 415-947-4222 and NNEPA, Patrick Antonio, at 928-871-7125. If the Primary SSO Coordinator is unable to reach USEPA or NNEPA by telephone, an email notification shall be submitted to R9NPDES@epa.gov and patrickantonio@navajo-nsn.gov.

The Primary SSO Coordinary shall submit the follow-up report within 5 days of the Permittee becoming aware of an SSO via NeT-Sewer Overflow. The report must include:

- the location of the SSO, including GPS coordinates;
- a description of the SSO, including estimated volume;
- the duration of the SSO, including dates and times;
- the cause of the SSO;
- if the SSO has not been abated, the date and/or time it is expected to be abated;
- steps taken and/or plans to reduce, eliminate, and prevent reoccurrence of the SSO; and
- steps taken and/or plans to mitigate any harm to public health or the environment from the SSO.

A "notifiable SSO" is an overflow, spill, release, or diversion of wastewater from a sanitary sewer collection system that occurs prior to a treatment plant. Sanitary sewer overflows include: a) overflows or releases of wastewater that reaches waters of the US or Navajo Nation, b) overflows or releases of wastewater that do not reach waters of the US or Navajo Nation, and c) wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. SSOs are generally caused by high volumes of infiltration and inflow (I/I), pipe blockages, pipe breaks, power failure, and insufficient system

capacity. Immediate notification shall be provided within 24 hours of becoming aware of the event. This immediate notification must be made by oral report by directly speaking with an USEPA and NNEPA staff person. If NTUA is unable to reach a staff person, NTUA shall provide email notification to R9NPDES@epa.gov and patrickantonio@navajo-nsn.gov. The follow-up written report shall be submitted within five days of becoming aware of the SSO event. The submission to USEPA will be through NeT-Sewer Overflow and to NNEPA at patrickantonio@navajo-nsn.gov.

For unanticipated notifiable SSOs caused by an extreme weather event (i.e. monsoon season) that could flood the entire sewer system and are too numerous to count, NTUA shall provide information that can be practicably captured. There is recognition that some information cannot be practically captured, like latitude/longitude, source/structure, duration of the SSO, the estimated discharge volume, the corrective actions taken, or the potential impacts.

Draft Sanitary Sewer Overflow Response Plan

Public Comments

NTUA posted the Draft SSORP on the website and received public comments on December 21, 2023. Those comments were used toward finalizing this final SSORP. A copy of the comments is shown on Appendix E. All comments were addressed and commenters were responded to at the email address provided.

Chinle General Utility Information

Approximate Population of Chinle: 3,771

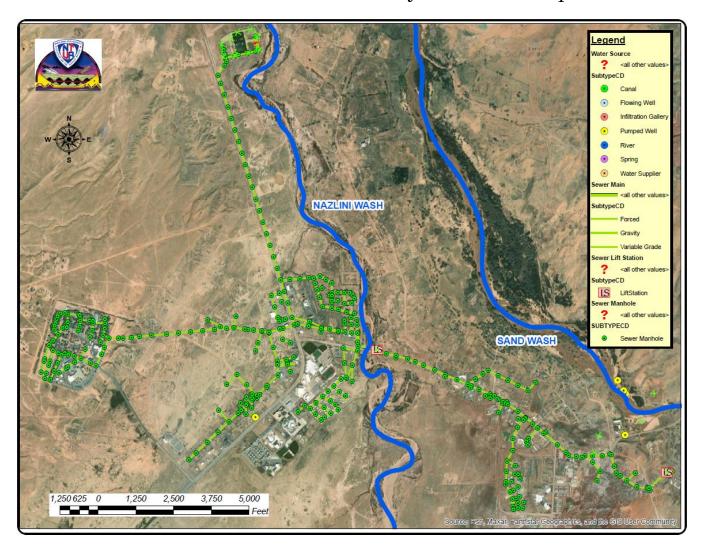
Approximate Number of Customer Connections: 1,278

Estimated number of Linear Feet of Sanitary Sewer Pipe in System: 39,600

Number of Pump / Lift Stations in the System: 1-Lift Station w/ 2-pumps

LS Name	LS ID	LS Address	Latitude	Longitude
Chinle Lift Station	Lift Station 1	Navajo Route 9	36.159506	-109.574309

Chinle General Collection System Area Map



Chinle Equipment Inventory

Equipment Description	Equipment Name	Equipment Status
2005 TRAVEL VAC TRASH PUMP W/TRAILER	3312	Available
1980 DIB PONTOON BOAT	3315	Available
1980 PONTOON BOAT TRAILER	3316	Available
2008 SECA SEWER CLEANER WITH TRAILER	3310	Available
2011 INTERNATIONAL DUMP TRUCK 4400 4X2	3314	Available
2011 CATERPILLAR BACKHOE LOADER 4X4	3340	Available
2011 GMC 3/4 TON 4X4 REGCAB, LB,PICKUP	3341	Available
2011 GMC 3/4 TON 4X4 EXTCAB, UTILITY BED	3342	Available
2011 GMC 3/4 TON 4X4 EXTCAB, UTILITY BED	3344	Available
2011 GMC 3/4 TON 4X4 EXTCAB, UTILITY BED	3345	Available
2012 GMC 3/4 TON 4X4 EXTCAB, UTILITY BED	3348	Available
2012 GMC 3/4 TON 4X4 EXTCAB, UTILITY BED	3349	Available
2015 TRAIL KING FLATBED TRAILER	3350	Available
2015 GMC 3/4T 4X4 EXT- DOUBLECAB,UTIL,SRW	3351	Available
2015 GMC 3/4T 4X4 EXT- DOUBLECAB,UTIL,SRW	3352	Available
2016 GMC 3/4 TON 4x4 -EXTCAB, UTILITY BED	3353	Available
2011 GMC 3/4 TON 4X4 EXTCAB,UTILITY BED	3346	Available
2012 BIG TEX DUMP TRAILER 10'	3347	Available
2012 GMC 3/4 TON 4X4 EXTCAB, UTILITY BED	3354	Available

Chinle Probable SSO Event Location Table

Of the amount of 345 manholes, below are known locations for SSO's from the previous 5 years.

Location ID / Name	Manhole ID	Latitude	Longitude	Approximate Number of Occurrence (Past 5 Years)
1	A-39	36.161081°	-109.601669°	1
2	B-75	36.163259°	-109.585679°	1
3	A-72	36.158468°	-109.584392°	6
4	D-04	36.156828°	-109.578278°	2
5	C-80	36.153273°	-109.558260°	3
6	C-82	36.151036°	-109.557571°	6
7	C-58	36.149192°	-109.559527°	2
8	C-63	36.146183°	-109.554812°	1
9	C-25	36.150750°	-109.554369°	1
10	C-08	36.149446°	-109.548147°	1
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A map of the Probable SSO Events can be found in Appendix G.

Kayenta General Utility Information

Approximate Population of Kayenta: 5,634

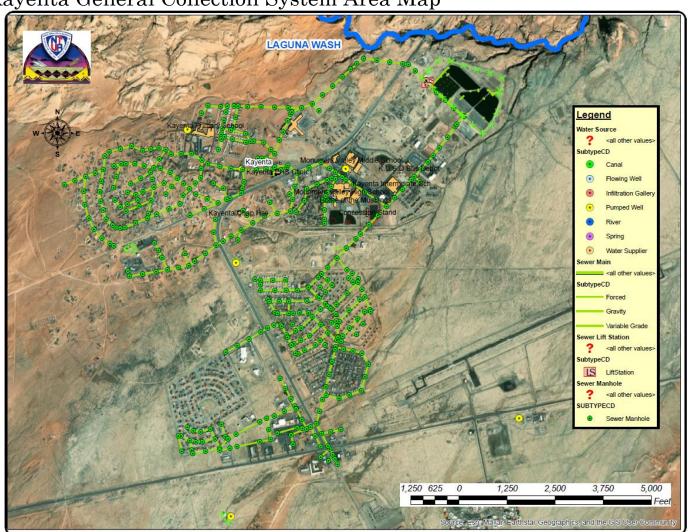
Approximate Number of Customer Connections: 1,420

Estimated number of Linear Feet of Sanitary Sewer Pipe in System: 102,960

Number of Pump / Lift Stations in the System: 2-pumps/1-Lift Station

LS Name	LS ID	LS Address	Latitude	Longitude
Kayenta WWTP Lift Station	Lift Station 1	Kayenta WWTP	36.733703	-110.237694

Kayenta General Collection System Area Map



Kayenta Probable SSO Event Location Table

Of the amount of 400 manholes, below are known locations for SSO's from the previous 5 years.

Location ID / Name	Manhole ID	Latitude	Longitude	Approximate Number of Occurrence (Past 5 Years)
1	B-08	36.729513°	-110.264659°	2
2	B-81	36.725250°	-110.265767°	1
3	B-70	36.724414°	-110.262348°	1
4	B-55	36.730149°	-110.258351°	1
5	A-03	36.726746°	-110.258662°	6
6	A-11	36.731474°	-110.249469°	2
7	C-19	36.726626°	-110.249817°	2
8	C-37	36.724542°	-110.254158°	1
9	C-07	36.726336°	-110.239784°	1
10	C-29	36.720811°	-110.259241°	1
11	D-47	36.719119°	-110.252897°	1
12	D-53	36.718409°	-110.248918°	2
13	D-99	36.719053°	-110.246270°	2
14	E-67	36.714676°	-110.244207°	1
15	E-27	36.713770°	-110.246605°	2
16	E-58	36.707350°	-110.246495°	1

A map of the Probable SSO Events can be found in Appendix G.

Kayenta Equipment Inventory

Equipment Description	Equipment Name	Equipment Status
Camel jet	6347	Available
Camel jet	6336	On-Standby
Dump truck	6341	Available
Backhoe	6335	Available

Tuba City General Utility Information

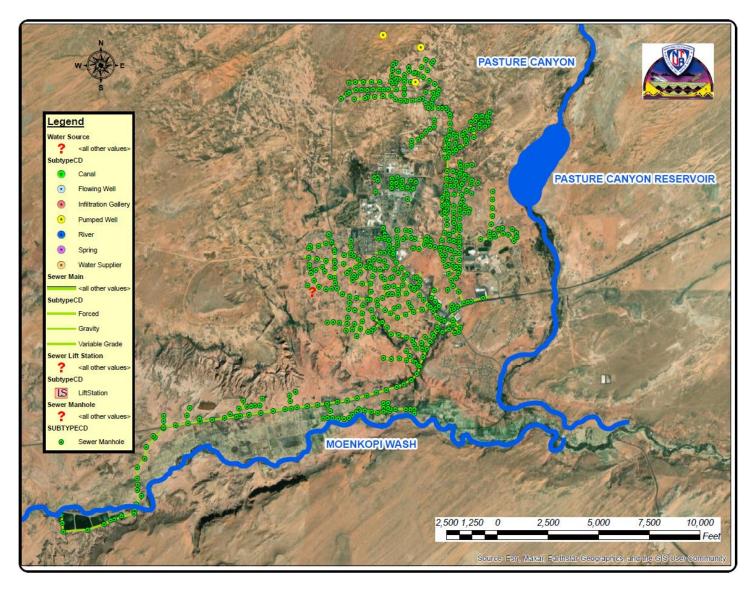
Approximate Population of Tuba City: 10,000

Approximate Number of Customer Connections: 1,362

Estimated number of Linear Feet of Sanitary Sewer Pipe in System: 8,712

Number of Pump / Lift Stations in the System: N/A (Tuba City wastewater collection system is a gravity system.)

Tuba City General Collection System Area Map



Tuba City Probable SSO Event Location Table

Of the amount of 560 manholes, below are known locations for SSO's from the previous 5 years.

Location ID / Name	Manhole ID	Latitude	Longitude	Approximate Number of Occurrence (Past 5 Years
1	A-96	36.143929°	-111.233715°	4
2	F-26	36.128081°	-111.240585°	4
3	C-69	36.127126°	-111.243898°	1
4	C-83	36.126732°	-111.242278°	2
5	C-64	36.124959°	-111.241672°	1
6	C-76	36.124298°	-111.245069°	1
7	C-74	36.123640°	-111.243314°	7
8	C-92	36.122122°	-111.239477°	1
9	G-53	36.120510°	-111.245537°	1
10	G-31	36.117202°	-111.245479°	2
11	C-21	36.120102°	-111.239590°	5
12	G-40	36.116964°	-111.237777°	4
13	C-25	36.120324°	-111.233419°	3
14	C-30	36.119260°	-111.230751°	3
15	B-71	36.127032°	-111.227189°	1

A map of the Probable SSO Events can be found in Appendix G.

Tuba City Equipment Inventory

Equipment Description	Equipment Name	Equipment Status
3/4 Pick-up	4337	Available
3/4 Pick-up	4333	Available
3/4 Pick-up	4332	Available
3/4 Pick-up	4343	Available
3/4 Pick-up	4340	Available
3/4 Pick-up	4344	Available
Camel Jet	4342	Available
JD Backhoe	4336	Available
Dump Truck	4312	Available
Utility Trailer	4339	Available
3/4 Pick-up	4337	Available
3/4 Pick-up	4333	Available
3/4 Pick-up	4332	Available
3/4 Pick-up	4343	Available
3/4 Pick-up	4340	Available
3/4 Pick-up	4344	Available
Camel Jet	4342	Available

Appendix A

Example Warning Signs

KEEP OUT



CONTAMINATED WATER MAY CAUSE ILLNESS

FOR FURTHER INFORMATION CALL: 1-800 528 -5011

Appendix B

$NTUA \; SSO/Bypass \; Form \;$

NTUA-SANITARY SEWER OVERFLOW (SSO)/BYPASS FORM

TWENTY-FOUR-HOUR REPORTING OF NON-COMPLIANCE TO USEPA

District:
1. Location of overflow/bypass (provide GPS coordinates):
2. Who notified NTUA:
3. Who was notified:
4. Time and date of notification (provide notification/work order number):
5. Crew/Equipment used:
6. Was the upstream and downstream line cleaned after:
Estimate total distance (feet):Size & Type of Pipe (inches):
7. Date/Time overflow/bypass started: Date/Time overflow/bypass ended:
8. Anticipated duration of the noncompliance if not immediately corrected:
9. Cause of overflow/bypass (be descriptive e.g., grease, root, debris):
10. Description of source (e.g., manhole cover, pump station, etc.):
11. Estimated amount (in gallons) of overflow/bypass:
12. Was overflow disinfected with chlorination?Time chlorination started: Amount of chlorine used:
13. What actions are being taken to mitigate and/or prevent further occurrences?
District Foreman

Appendix C

Methods for Estimating Spill Volume

Various approaches exist for estimating the volume of a sanitary sewer spill. This appendix documents the three methods that are most often employed. The person preparing the estimate should use the method most appropriate to the sewer overflow in question and use the best information available. Photographs are critical in using any of the spill volume methods.

Method 1 Eyeball Estimate

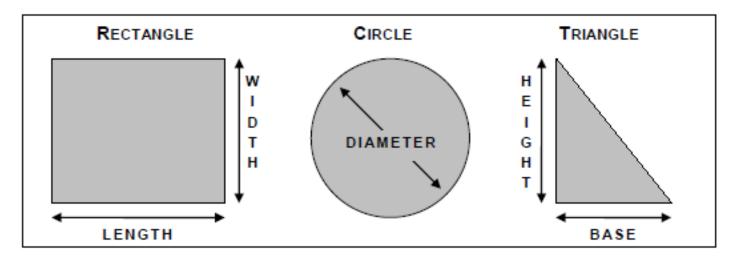
The volume of small spills can be estimated using an "eyeball estimate". To use this method, imagine the amount of water that would spill from a bucket or a barrel. A bucket contains 5 gallons, and a barrel contains 50 gallons. If the spill is larger than 50 gallons, try to break the standing water into barrels and then multiply by 50 gallons. This method is useful for containing spills up to approximately 200 gallons.

Method 2 Area/Volume Calculations

The volume of most small spills that have been contained can be estimated using this method. The shape, dimensions, and depth of the contained wastewater are needed. The shape and dimensions are used to calculate the area of the spills, and the depth is used to calculate the volume.

- Step 1 Sketch the shape of the contained sewage (see Figure 1).
- Step 2 Measure or pace off the dimensions.
- Step 3 Measure the depth at several locations and select an average.
- Step 4 Convert the dimensions, including depth, to feet.
- Step 5 Calculate the area in square feet using the following formulas:
 - a. Rectangle: Area = length (feet) x width (feet)
 - b. Circle: Area = diameter (feet) x diameter (feet) x .785
 - c. Triangle: Area = base (feet) x height (feet) x 0.5
- Step 6 Multiply the area (square feet) times the depth (in feet) to obtain the volume in cubic feet.
- Step 7 Multiply the volume in cubic feet by 7.5 to convert it to gallons.

Figure 1: Common Shapes and Dimensions



Method 3 Duration and Flowrate

Calculating the volume of larger spills, where it is difficult or impossible to measure the area and depth, requires a different approach. In this method, separate estimates are made of the duration of the spill and the flow rate. The methods of estimating duration and flowrate are:

Duration: The duration is the time that elapsed from when the spill started to when the flow was restored.

Start time: The start time is sometimes challenging to establish. Here are some approaches:

- Local residents can be used to establish start times. Inquire as to their observations. Spills that occur in rights-of-way are usually observed and reported promptly. Spills that occur out of the public view can go on longer. Sometimes, observations like odors or sounds (e.g., water running in a normally dry creek bed) can be used to estimate the start time.
- Changes in flow on a downstream flowmeter can be used to establish the start time. Typically, the daily flow peaks are "cut off" or flattened by the flow loss. This can be identified by comparing hourly flow data during the spill event with flow data from prior days.
- Conditions at the spill site change over time. Initially, there will be limited deposits of toilet paper and other sewage solids. The sewage solids form a light-colored residue after a few days to a week. After a few weeks to a month, the sewage solids turn dark. The quantity of toilet paper and other materials of sewage origin increases over time. These observations can be used to estimate the start time in the absence of other information. Taking photographs to document the observations can be helpful if questions arise later in the process.
- It is important to remember that spills may not be continuous. Blockages are not usually complete (some flow continues). In this case, the spill would occur during the peak flow periods (typically 10:00 to 12:00 and 13:00 to 16:00 daily). Spills that occur due to peak flows in excess of capacity will occur only during, and for a short period after, heavy rainfall.

End time: The end time is usually much more accessible to establish. Field crews observe the "blow down" that occurs when the blockage is removed. The "blow down" can also be observed in downstream flowmeters.

Flow Rate: The flow rate is the average flow that left the sewer system during the time of the spill. There are three common ways to estimate the flowrate:

The Manhole Flowrate Chart: This chart, attached as Page 4, shows sewage flowing from manhole covers at a variety of flow rates. The observations of the field crew can be used to select the appropriate flow rate from the chart. If possible, photographs help document the basis for the flow rate estimate.

- Flowmeter: Changes in flows in downstream flowmeters can be used to estimate the flow rate during the spill.
- Counting Connections: Once the location of the spill is known, the number of upstream connections can be determined from the sewer maps. Multiply the number of connections by 200 to 250 gallons per day per connection or 8 to 10 gallons per hour per connection.

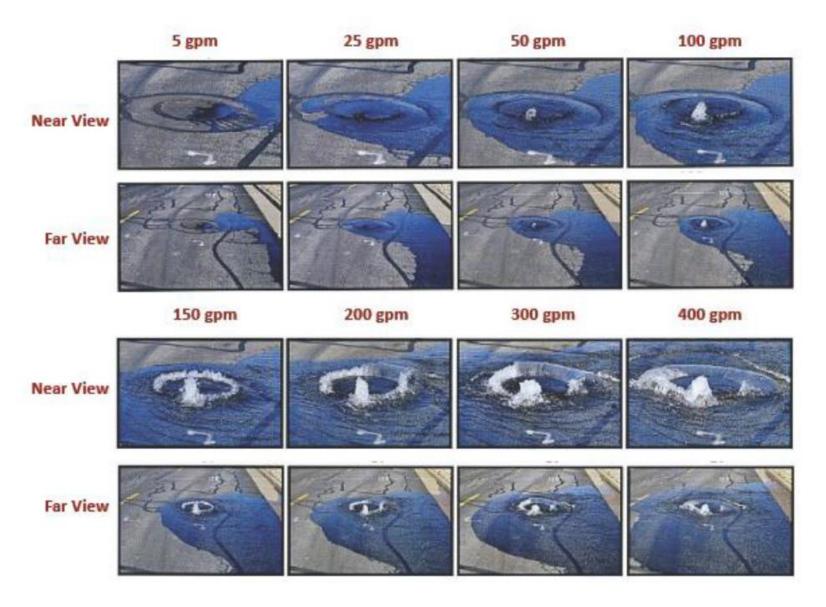
For example: 22 upstream connections x 9 gallons per hour per connection = 198 gallons per hour / 60 minutes per hour = 3.3 gallons per minute

Spill Volume: Once duration and flow rate have been estimated, the volume of the spill is the product of the duration in hours or days and the flow rate in gallons per hour or gallons per day.

For example:

Spill start time = 11:00 Spill end time = 14:00 Spill duration = 3 hours 3.3 gallons per minute X 3 hours X 60 minutes per hour = 594 gallons

Flow Estimation Example Pictures



Appendix D

Common Causes of Sanitary Sewer Overflows (SSO)





Infographic Credit to: Carol Stream, Illinois (Public Works), EPCOR 2023

Appendix E

Public Comments to the Sanitary Sewer Overflow Response Plan

Comment No.	Comment	Subscribe for Future Posts?	Date/Time Submitted	Unique ID	Applicable to SSORP?	Concern Addressed in SSO under		Notes
1	Sewer is backed up and coming out the back of my house	N/A	Nov 5, 2023 04:23 PM	SSOP-ID-0002	NO NO	V		Ongoing dialogue with commenter to address concerns. NTUA appreciates being informed about the backup and has scheduled an inspector to view the
	This is NOT a comment. This is a test to see if the comments box has a character limit. Thank you. Ya'arééh & Greetings,							site.
	We take this time to share with you our proposed overall Sanitary Sewer Overflow Response Plans (SSORP). Please read through the description and purpose of the plan. We ask for comments after your review. Please use attached on-line form under the Red Box to the right. Your comments will help us in ensuring each one gets addressed and acknowledged. DEADLINE: Please submit comments no later than Friday, December 8, 2023							
2	The objective of the SSORP is to document NTUA's plans for mitigating or preventing potential emergency overflows whenever possible, and to prepare NTUA customers as well as responding agencies and departments to efficiently deal with the effects of such events, and to protect public health, environment, and property.	N/A	Nov 8, 2023 12:19 PM	SSOP-ID-0003	NO	N/A		N/A
	NTUA's response to any potential Sanitary Sewer Overflow (SSO) will help minimize the overflow impacts on public health water quality, the environment, and customer sendre							
3	Water, even waste water is becoming a valuable commodity, I like to suggest two ofversion in existing buildings when possible and a regirement for all new buildings. It is frequested Divention, to the landscape for a laber green landscape and especially to grow trees for shading during the summer months. Diverting greywater will lessen the flow to septic tanks and even act as a pre-warming of overflow. This is important when a building has a leak and water quickly fills up the septic tank. 2013 is the diversion of PEE when possible to degrees the flow to the septic tank, to harvest as a fertilizer and to reduce nitrogen contamination in the groundwater. 95% of all nitrogen from our bodies is in the pee. State of Arizona has a conservation water grant out right now the we can help you win to install 25 to 100 demonstrations of both concepts. The grant could also be used to replace septic tanks.	n/a	Nov 9, 2023 03:42 PM	SSOP-ID-0004	NO			Ongoing dialogue with commenter to address concerns. Reducing the amount of wastewater entering NTUX collection system is a worthy goal, but once liquids of any hair enter the collection system and then site are part of an SO, that overflow cannot be recycled, re-used or put to any other beneficial use.
4	I have been having problems at home and did not know who to reach out to about my issue there is a sewage smell that comes from my main master bedroom n it smells throughout the night we have dealt with it for about a month 1/2 I did ty to drain some liquid down that I bought from Lowe's n it did take care of some smell. I still continue to smell it especially when I use the hot water.	N/A	Nov 10, 2023 02:41 PM	SSOP-ID-0005	NO			Ongoing dialogue with commenter to address concerns. Contact numbers in the SSORP were revised to clarify who and where to call.
5	Water line not connected.	N/A	Nov 12, 2023 06:32 PM	SSOP-ID-0006	NO			
6	One thing I would recommend is that you have a second site or back up site in case of overflow. I had this happen in my area and I overflowed in my yard and now have to deal with foundation problems and hole in my yard. Also having a phone number to report on evenings and weekends would have helped. I had to call so many numbers before anyone responded and then the response time was an too long. Better marked or maintained man holes also as they could not locate the manholes in our area. When they did It was covered and weeks and these had grown over the second of the country of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second	N/A	Nov 15, 2023 01:55 PM	SSOP-ID-0006	YES	Concern #1: Having a back up Site Solution: Although we cannot simply add a second site due to the large scale of our operations, any concerns of overflow are addressed in the section labeled "Restore Flow" Under Paragraph 3	Concern #2: Having a phone number listed in the SSO. Solution: We have listed both the (800) and local number under section "Public Observation of SSO"	Comments noted and NTUA revised the SSORPs where appropriate.
7	Don't know what type of comment you are looking for. We have a septic tank which we are on the list for replacement. We have 2 leach fills because this first one failed after several years. I know getting septic tank service is expensive and a lot of people can not afford to have it pumped.	NO	Nov 16, 2023 09:46 AM	SSOP-ID-0008	NO	Onder Fungraph 5		
8	No comments	NO	Nov 25, 2023 03:37 PM	SSOP-ID-0009	NO			
9	Sanitation is very important because: Children Eldefry People w medical needs to keep sanitation clean	NO	Nov 29, 2023 01:43 PM	SSOP-ID-0011	NO			
10	Sanitation is very important because: Children Elderly People w medical needs to keep sanitation clean	NO	Nov 29, 2023 01:43 PM	SSOP-ID-0012	NO			
11	Know what you can and can't flush .	NO.			YES	Concern: Having information listed to know what users can and cannot flush. Solution: We have added "Appendix D: Common Causes of Sanitary Sewer Overflows" to inform the public what they can and cannot flush.		Information will also be shared on the NTUA website. Included FOG materia
12	No comment	NO	Nov 30, 2023 05:12 AM	SSOP-ID-0013	NO			
13	Current I am not tapped into the sewer line. I have a septic that has to be pumped by an outside source. I would be nice to have a local septic service locally. I am interested in a sewage line down our lane on farm road 1 st lane. We are next to the main farm road.	YES	Dec 1, 2023 03:27 PM Dec 4, 2023 11:40 AM	SSOP-ID-0015 SSOP-ID-0016	NO			
14	I am interested in a sewage interested in a service of a service of the service o	YES	Dec 4, 2023 11:40 AM Dec 5, 2023 07:05 PM	SSOP-ID-0016 SSOP-ID-0017	NO			Ongoing dialogue with commenter to address concerns. The comment is not relevant to the draft SSORP but NTUA made contact with the commenter. The NTUA Project Manager had determined that the customer is waiting on feasibility studies from NECA.
15	Will this overflow be going into the Chinle Lagoon and into the Nazlini wash (Greenriver). As it is, now the road isn't crossable due to lagoon water flowing through on NR 8095. NTUA doesn't help with the crossing of where the sewer runs in the wash.				NO			Ongoing dialogue with commenter to address concerns. There have been many initiatives by the family to get this issue resolved, and was addressed by the chapter. The issue however is with the roads and DOT. NTUA is still gathering information from the commenter to ensure we are doing all that we can to
16	Will the your elderly customers receive a discount if they are requiring this service?	NO	Dec 6, 2023 03:12 PM	SSOP-ID-0018	NO			help.
	How will the customers be prioritized?	YES	Dec 7, 2023 08:52 AM	SSOP-ID-0019				

$\operatorname{Appendix} F$

NTUA Job Briefing Report (Tailgate Session)



NAVAJO TRIBAL UTILITY AUTHORITY JOB BRIEFING REPORT

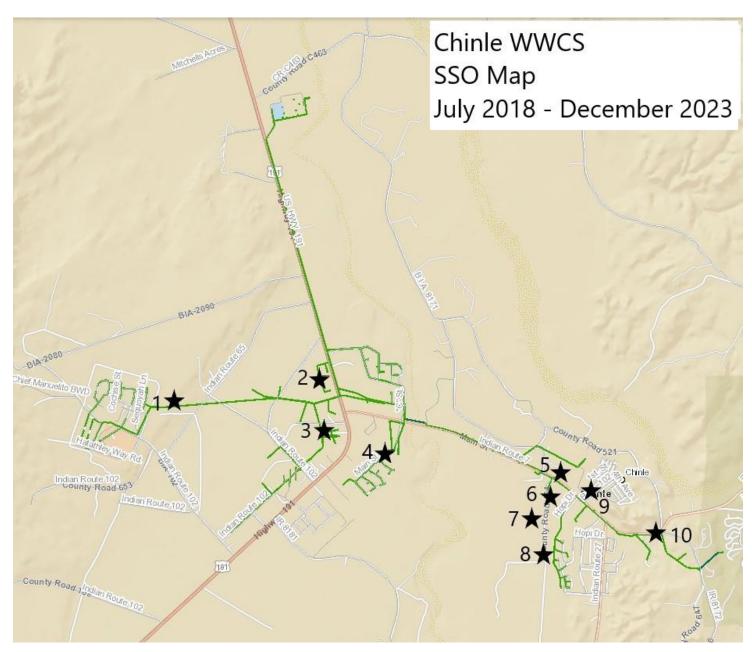
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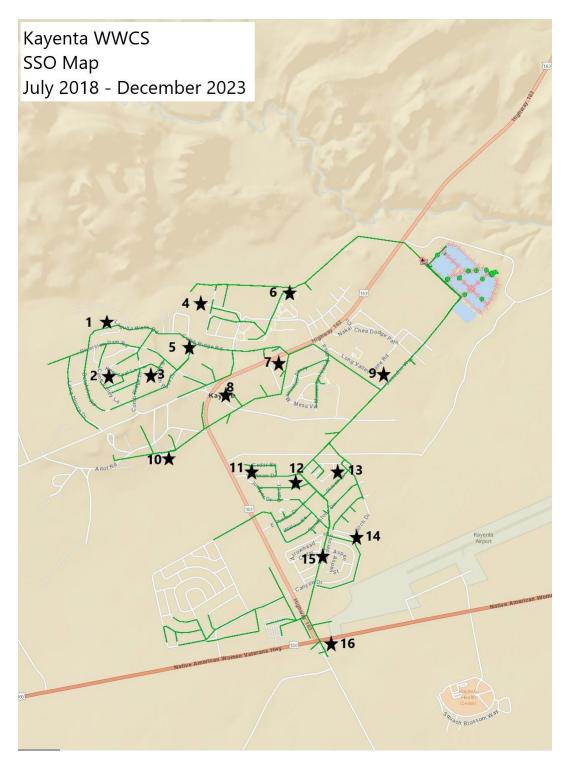
Copies: (1) Safety; (2) File; (3) Superintendent

NTUA Form No. 7003

 $\label{eq:Appendix G} Appendix \ G$ Chinle Probable SSO Event Location Map



Kayenta Probable SSO Event Location Map



Tuba City Probable SSO Event Location Map

