

Survey Results

TO: SSO-WDR Task Force
FROM: CWEA Staff
SUBJECT: GWDR-SSO Survey Analysis
DATE: February 9, 2010

CWEA, BACWA, CASA, CVCWA, SCAP and Tri-Tac jointly conducted a survey in the summer of 2009 to get input on the GWDR-SSO and the potential updates to the order. The data has been reviewed by the SSO-WDR Task Force and its members (including representatives from BACWA, CASA, CVCWA, SCAP and Tri-Tac) and has been shared with the staff of the SWRCB. CWEA contracted with Megan Yoo for the survey summary and tabulations.

A total of twenty questions were asked to identify classifications of respondents (i.e., agency type, respondent's role, size of agency, size of population served, size of collection system) and to obtain general feedback on the GWDR-SSO program and its components (i.e., whether the program is easy to understand, how the program is working, what sort of changes should be made). The survey provides a valuable resource that identifies which aspects of the program are easily understandable and working well, in addition to key areas of concern.

The survey was distributed to a total of 2,037 individuals (via valid e-mail addresses obtained from the SWRCB NOI list and records of SSO-WDR training attendees from 2006 to May 2008). A total of 364 respondents completed the survey (18% response rate), and the survey was closed to further responses on September 8, 2009. Quantitative data obtained from this survey was used to analyze the responses to each question, and the following is a question-by-question analysis with an overall summary at the conclusion of this memorandum.

Question 1: Which of the following describe your employer?

The greatest majority of respondents represented either publicly owned treatment works (39%) or sanitary districts (27%). Aside from contract operators, consultants, and academic institutions (11%), the remainder chose to classify themselves as "other."

1. Which of the following describe your employer?		
Publicly Owned Treatment Works	141	39%
Sanitary District	97	27%
Contract Operator	8	2%
Consultant	22	6%
Academic	10	3%
Other, please specify	86	24%
Total	364	100%

Those that selected “other” have been summarized below. The majority reported that they worked for a city, municipal agency or public wastewater/collections system.

Number	Other?
18	City
16	Municipal agencies
14	Public ww/collections systems
6	Correctional Facilities
5	Local Government
4	CA Parks
3	Privately owned treatment plants
3	Special District
2	Government facilities
2	Healthcare
2	Joint Powers Authority
2	Sanitation District
1	Collection System Operator
1	Community Service District
1	County Airport
1	Educational Facility (college)
1	Institution
1	Irrigation District
1	RWQCB
1	Transportation
1	Winery

Question 2: Please indicate your role at your employer in terms of the GWDR-SSO.

The majority of respondents identified themselves as the legally responsible official (40%), followed by data submitters (26%), those who were involved with directing Sanitary Sewer Management Plan (SSMP) efforts (18%), and the remainder chose to classify themselves as “other.” These trends were quite similar, even when responses were broken down by employer classification (i.e., publicly owned treatment works, sanitary districts, operators, consultants, academic institutions, etc.).

2. Please indicate your role at your employer in terms of the GWDR-SSO.		
Data submitter	87	26%
Legally Responsible Official	133	40%
Directing Sanitary Sewer Management Plan (SSMP) efforts	60	18%
Other, please specify	52	16%
Total	332	100%

Question 3: How many employees total are there at your employer?

Employers with 25 or fewer employees represented almost half of the respondents (46%), and a slightly smaller percentage of respondents worked for employers who had 76 or more employees (38%). A very small percentage of respondents represented employers with 26 to 75 employees (16%). These trends were quite similar when broken down by employer classification for the most part; however, it must be noted that an overwhelming majority of contract operators (88%) had 25 or fewer employees.

3. How many employees total are there at your employer?		
1 to 25	153	46%
26-75	53	16%
76 or more	126	38%
Total	332	100%

Question 4: My agency serves the following population:

Just under half of the respondents represented agencies that serve populations of 10,000 to 100,000 (45%). Almost a quarter of the respondents represented agencies that serve populations greater than 100,000 (23%), followed by those who serve populations of 2,500 to 10,000 (18%), and those who serve populations of less than 2,500 (13%).

4. My agency serves the following population:		
Less than 2,500	43	13%
2,500 to 10,000	61	18%
10,000 to 100,000	151	45%
More than 100,000	77	23%
Total	332	100%

Question 5: What is the size of your agency's collection system?

Small collection systems of 0 to 50 miles represented just over a third of the respondents (35%), and just over a quarter of the respondents had collection systems that were 50 to 150 miles (27%). The remainder represented almost a perfectly even spread between collection systems that were 150 to 249 miles (13%), 250 to 500 miles (13%), and over 500 miles (12%). It is interesting to note that while smaller population sizes are exclusively served by smaller collection systems, this trend does not hold as the population size increases. There is an increased variance in collection system size as the size of the population served increases.

5. What is the size of your agency's collection system?		
0-50 miles	117	35%
50-150 miles	88	27%
150-249 miles	44	13%
250-500 miles	43	13%
Over 500 miles	40	12%
Total	332	100%

Question 6: The GWDR-SSO is clear and easy to understand.

An overwhelming majority of respondents either agreed (strongly & agreed) or felt neutral about this statement (48% and 41%, respectively). A much smaller percentage disagreed (9%) and strongly disagreed (2%).

6. The GWDR-SSO is clear and easy to understand.		
Strongly Agree	16	4%
Agree	159	44%
Neutral	148	41%
Disagree	34	9%
Strongly Disagree	7	2%
Total	364	100%

Question 7: If you answered disagree or strongly disagree, what is not clear and easy to understand?

Agencies would like to have more clarification on the regulations and requirements of the GWDR-SSO program. Some of the language is too open to interpretation and has led to varied levels of understanding as to what exactly is required. Essentially, agencies would like to see clearly defined categories and classifications with a set of regulations and requirements that are unambiguous and concise. Additionally, a more user-friendly electronic reporting system is requested. Other concerns include the sentiment that the program is far too rigorous for smaller systems and a need for a more seamless integration with other regulatory agencies, in terms of SSO notifications.

Question 8: The GWDR-SSO is working well.

Again, the majority of respondents either agreed (strongly and agree) or felt neutral about this statement (48% and 40%, respectively). The remaining quarter either disagreed (10%) or strongly disagreed (3%).

8. The GWDR-SSO is working well.		
Strongly Agree	13	4%
Agree	160	44%
Neutral	146	40%
Disagree	35	10%
Strongly Disagree	10	3%
Total	364	100%

Question 9: If you answered disagree or strongly disagree, what is not working well?

Many agencies feel that enforcement needs to begin with agencies who are not reporting spills or complying with the requirements of the GWDR-SSO. In addition, they feel that more focus should be placed on spills of larger magnitudes rather than smaller spills. There is a sentiment that there is too much paperwork involved with the program, and many are overwhelmed by the 2-hour reporting requirements. Especially for those agencies with limited staff resources, it is difficult to respond to the actual spill while ensuring that all the paperwork is filed within the 2-hour timeframe. Again, smaller agencies feel that the program does not fully address their needs. Lastly, clarification and training on GWDR-SSO requirements and its purpose would help agencies further understand the importance of the program itself.

Question 10: The GWDR-SSO has had positive impacts

Over two thirds of the respondents felt that the GWDR-SSO had a positive impact (69%), and the remainder did not (31%).

10. The GWDR-SSO has had positive impacts.		
Yes	250	69%
No	114	31%
Total	364	100%

Question 11: If you answered yes, how?

A very large majority of respondents noticed increased awareness and being proactive towards collection systems has led to better justification for funding requests and has helped implement changes and upgrades to their systems and programs. This has ultimately resulted in the identification of problems in the sewer systems and enabled agencies to reduce the number of SSOs. Agencies also appreciate the congruity and uniformity that the program has introduced and are beginning to see how they compare against other agencies performing under the same standards and regulations.

Question 12: The GWDR-SSO has caused challenges.

The majority of respondents did agree that the GWDR-SSO has caused challenges (61%), while the remainder did not (39%).

12. The GWDR-SSO has caused challenges.		
Yes	221	61%
No	143	39%
Total	364	100%

Question 13: If you answered yes, how?

The largest challenge the GWDR-SSO has created is associated with finding the funding and resources to implement the program. Without grants and initiatives, it is very difficult, especially in the current economic situation, to implement all the aspects of the program, receive proper training and education, and comply with all the requirements and regulations, such as the 2-hour notification requirement. On the other hand, through implementation of the GWDR-SSO, many agencies have been able to determine areas for growth within their own management, operations, and maintenance groups, and with further clarification on the goal and purpose of this program, many others will be able to see the benefits, as well. Lastly, the desire to have a more streamlined reporting system that was integrated with the reporting requirements of other regulatory agencies was mentioned again.

Question 14: What items, if any, should be added to the GWDR?

The majority did not feel that anything in particular should be added to the GWDR-SSO, but amongst those that did, the main suggestion was for increased collaboration among regulatory agencies so that a centralized reporting system could be implemented. Additionally, respondents requested modifications of the 2-hour reporting requirements, exemptions and/or modifications for smaller systems, distinction between sewer system overflows and private lateral events, clarification of classifications and definitions, a more user-friendly SSO locator application, mandatory certification for collection systems operators, and a review of/feedback on SSO data collected from the regulated agencies.

Question 15: Are there areas of the electronic reporting component that need addressing?

The majority of respondents did not feel that there were any areas of the electronic reporting component that needed addressing (62%), while the remainder felt that there were some areas that should be addressed (38%).

15. Are there areas of the electronic reporting component that need addressing?		
Yes	140	38%
No	224	62%
Total	364	100%

Question 16: If yes, what areas, and why?

The majority of the feedback on the electronic reporting system was that it is not very user-friendly or streamlined. Users also requested more specific items, such as, better distinction between spills caused by sewer mains and those from private laterals, auto-saving of the report , printer-friendly formatting of the report, a simpler method of inputting SSO locations, modification of the 2-hour reporting requirement, the option to make corrections to reports, additional comment areas for explanation of spills, and the option to input multiple SSOs caused by one stoppage. Lastly, users also mentioned that there should be an integrated electronic reporting system for all regulatory agencies so that all reporting activities can be done using one system.

Question 17: Are there any elements of the SSMP that need addressing?

Almost three-quarters of the respondents did not feel that there were any elements of the SSMP that needed addressing (73%), and the remainder felt that some elements should be addressed (27%).

17. Are there any elements of the SSMP that need addressing?		
Yes	100	27%
No	264	73%
Total	364	100%

Question 18: If yes, which elements, and why?

The main response was that feedback on performance and compliance goals and results would be helpful. Again, those dealing with smaller systems requested modifications and adjustments to make the program less rigorous for them, and many agencies voiced concerns that the issue of private laterals should be addressed (so that reporting them does not count against the agency). Again, an integrated reporting system was requested so that all regulatory agencies could utilize one reporting method, and other requests included additional training and certification and further clarification of program requirements.

Question 19: Please rank these 10 areas in order of importance for potential modifications to the GWDR-SSO and the processes around it (general comments, CIWQS reporting, SSMP, Collection Systems Questionnaire, policy, enforcement, audits, monitoring and reporting program requirements, enrollment process for the order, collection systems certification and training requirements). 1 being the most important to address and 10 being the least important to address.

Quite a significant number of respondents marked “Don’t Know” for each category (range of 16% to 29%). There was also a fairly even disbursement between the ratings of 1 to 10 for each category, as well (range of 3% to 15%; majority between 6% to 9%). The following categories had more respondents who felt these modifications were more important to address (percentage of respondents who marked the category from 1 to 5, percentage of respondents who marked the category from 6 to 10): CIWQS reporting (51%, 32%), SSMP (47%, 35%), policy (45%, 35%), enforcement (42%, 37%), audits (50%, 31%), monitoring and reporting program requirements (50%, 35%), collection systems certification and training requirements (46%, 38%). The following categories had more respondents who felt these modifications were less important to address (percentage of respondents who marked the category from 1 to 5, percentage of respondents who marked the category from 6 to 10): comments (23%, 48%), Collection Systems Questionnaire (31%, 50%), and enrollment process for the order (22%, 52%). There were no categories where an overwhelming number of respondents felt extremely strongly either way about the category’s importance in terms of potential modifications.

It must be noted that responses to Question 20 revealed that there was some awkwardness to the forced ranking in Question 19. This question may need to be revised in format if used in any future surveys.

19. Please rank these 10 areas in order of importance for potential modifications to the GWDR-SSO and the processes around it. 1 being most important to address and 10 being least important to address.

Top number is the count of respondents selecting the option. Bottom % is percent of the total respondents selecting the option.	Most Important (rated 1-3)	1	2	3	4	5	6	7	8	9	10	Least Important (rated 8-10)	Don't know
CIWQS Reporting (data, online issues)	56 35%	31 15%	39 9%	29 11%	29 8%	21 8%	31 6%	27 9%	22 7%	13 6%	66 4%	17%	18%
Audits (what to expect, how to do internal)	35 32%	29 10%	50 8%	38 14%	29 10%	26 8%	24 7%	24 7%	22 7%	13 6%	74 4%	17%	20%
Monitoring and Reporting Program Requirements	31 31%	40 9%	39 11%	35 11%	34 10%	31 9%	30 9%	25 8%	19 7%	23 5%	57 6%	18%	16%
Collection Systems Certification & Training Requirements	49 30%	35 13%	25 10%	30 7%	29 8%	31 8%	21 9%	21 6%	31 9%	24 7%	26 7%	23%	63 17%
Policy (interpretation, revisions)	41 27%	37 11%	23 10%	33 6%	31 9%	29 9%	25 8%	25 7%	22 6%	25 7%	24 7%	20%	74 20%
Enforcement (order only)	31 27%	32 9%	33 9%	29 9%	27 8%	27 7%	29 7%	22 8%	31 6%	27 9%	76 7%	22%	21%
SSMP (elements, timeline)	22 26%	39 6%	31 11%	30 9%	47 8%	38 13%	30 10%	22 8%	25 6%	16 7%	64 4%	17%	18%
Collection Systems Questionnaire (content)	11 15%	25 3%	18 7%	30 5%	30 8%	28 8%	41 8%	34 11%	43 9%	36 12%	68 10%	31%	19%
General Comments (how the order was written)	12 13%	15 3%	23 4%	18 6%	20 5%	25 5%	22 7%	43 6%	31 12%	50 9%	105 14%	35%	29%
Enrollment Process for the Order	9 12%	16 2%	21 4%	20 6%	17 5%	33 5%	36 9%	32 10%	38 9%	51 10%	91 14%	33%	25%

Question 20: Any other general comments, questions, or suggestions?

Aside from the comments in regards to technical issues with Question 19 of the survey, many of the smaller agencies again voiced the desire for modifications/adjustments to the program so that the burden on them would not be as large. Others also requested integration and collaboration between the regulatory agencies so reporting can be completed on one site, mandatory certification for collection system operators, and ideas on how to deal with funding issues to support the program at the individual agencies.

Conclusion

It must be noted that a large number of respondents had less than 50 miles of pipeline, and many of the responses asking for "modifications/adjustments" to make the program less rigorous/burdensome specifically mentioned that collection systems with less than 50 to 100 miles of pipeline should be given such a break.

On the other hand, it was apparent from the survey responses that the majority of respondents realized many of the benefits of the program, but if they had a deeper understanding of the purpose and intent behind this program, they would be more willing to take the extra effort to complete all this "paperwork." Many of the respondents felt that they were simply creating all these reports and notifications with no real purpose behind them. There were several suggestions for improving the understanding and clarifying the purpose behind this program, including one that recommended a page on the website that showed an updated graph or chart showing the trend in SSO events in various regions. This would show the agencies that their data is indeed being utilized and monitored, and then they will feel like their efforts are not necessarily for naught.

In addition, many agencies wanted to ensure that they were not penalized or "punished" for reporting SSOs. There was a lot of concern voiced over the fact that any private lateral overflows reported in their area were counted as part of the agency's SSOs rather than counted separately. Others also felt that the more they disclosed on the reporting system, the more vulnerable they were to potential lawsuits from third parties misinterpreting the SSO data.

Lastly, a vast majority of respondents either felt the electronic reporting system was very user-unfriendly and/or they had a number of specific suggestions that they felt would help streamline the process a bit more. They also felt that integration with other regulatory agencies to minimize duplicate reporting would help them on their end, as well.