

# SEWER SYSTEM MANAGEMENT PLAN COMPLIANCE ANALYSIS

*Prepared for:*

<<Agency Name>>

<<Agency Street Address

<<Agency City, State, ZIP>>

**DUDEK**

605 Third Street  
Encinitas, CA

*Rev 2-1/22/2007*

*Insert Table of Contents*

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## ABBREVIATIONS / ACRONYMS

AB	Assembly Bill
BAT	Best Available Technology
BMP	Best Management Practice
CCTV	Closed-Circuit Television
CFR	Code of Federal Regulations
CIP	Capital Improvement Program
CIWQS	California Integrated Water Quality System
CM	Corrective Maintenance
CMMS	Computerized Maintenance Management System
CWEA	California Water Environment Association
District	<<Agency Name>>
ERP	Emergency Response Plan
FOG	Fats, Oils, and Grease
GPS	Global Positioning System
GWDR	General Waste Discharge Requirements also referred to as the Waste Discharge Requirements (WDR)
I/I	Inflow / Infiltration
IERP	Integrated Emergency Response Plan
MRP	Monitoring and Reporting Program
O&M	Operation and Maintenance
OES	Office of Emergency Services
Order	SWRCB Order No. 2006-0003-DWQ adopted May 2, 2006
Pd	Predictive Maintenance
PM	Preventative Maintenance
PMP	Preventative Maintenance Program
R&R	Rehabilitation and Replacement
RCDEH	Riverside County Department of Environmental Health
RWQCB	Regional Water Quality Control Board
SOP	Standard Operating Procedure <u>or</u> Standard Maintenance Procedure
SSO	Sanitary Sewer Overflow and any sewer spill or overflow of sewage
SSMP	Sewer System Management Plan
SWRCB	State Water Resources Control Board
WDR	Waste Discharge Requirements also referred to as the General Waste Discharge Requirements (GWDR)
WWTP	Wastewater Treatment Plant

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## Document Intent and Structure

The intent of this document is to provide the <<Agency Name>> with an analysis and recommendations necessary to comply with the SWRCB Order Number 2006-0003-DWQ which establishes the minimum requirements for the management, operations and maintenance of all publicly owned wastewater collection systems consisting of more than one mile of pipeline within the State of California. The Order requires that each affected agency develop a written SSMP that address the eleven basic elements listed in the Order. The state has established a time schedule, based on populations served, for the development and implementation of each element. The final document due is the finished SSMP.

This SSMP analysis has been designed to accomplish two tasks. The first task is to provide an organized format to analyze the District's documents, practices and procedures relative to the management, operation, maintenance and funding of its wastewater collection system and to weigh them against the requirements of the Order. The analysis is based upon a thorough review of the District's documents, practices and procedures and interviews with key District staff. Where deficiencies are found, recommendations are made to remediate those deficiencies. The second task is to provide the District with a finished SSMP document once the recommendations have been completed.

To accomplish the above tasks the SSMP analysis is written around the actual Order, in fact the Order is imbedded within the document. The analysis document is divided into fourteen chapters, one chapter for each of the eleven basic elements of the SSMP with the remaining chapters dedicated to spill reporting and miscellaneous WDR requirements. Chapters are broken into sub parts starting with the requirements of the Order for that particular element. The Compliance Summary section is a summary of how the District complies with that specific element. Compliance Documents section lists the backup documentation and their location for that specific element. The Roles and Responsibilities section denotes the staff positions and their responsibilities for that chapter. Within the above sections <<Include text>> will be found. These are simply place holders with a brief description of the type of information that should be entered in that section. As the information is ready for entry, the place holder should be overwritten. The Compliance Analysis is a series of questions and their responses obtained from the District's documentation and interviews with key District staff. The Recommendations section details the steps the District must take to achieve full compliance with the Order and is based upon the information obtained in the Compliance Analysis section. As the recommendations are implemented the Compliance Summary, Compliance Documents and Roles and Responsibilities sections can be fill in. The Key Points section provides additional clarification on what is required by the Order, how to achieve compliance, and may also include examples.

Once the recommendations have been completed and the appropriate data entered into Compliance Summary, Compliance Documents and Roles and Responsibilities sections, the analysis can be converted into the final SSMP. To accomplish this delete all of the Compliance Analysis, Recommendations and Key Points sections. The font used in these sections is different

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than the rest of the document to facilitate this conversion. The remaining document is the final SSMP Volume I.

The last section of the SSMP Compliance Analysis is the SSMP Task Development Schedule. This schedule lists all of the elements and sub elements required to achieve compliance with the Order. Upon completion of the analysis, the District will decide how they intend to proceed to achieve compliance with each element. Data from those decisions is to be inserted into the SSMP Task Development Schedule which will then become the first deliverable required by the Order.

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## EXECUTIVE SUMMARY

On May 2, 2006 the SWRCB adopted Order Number 2006-0003-DWQ that requires all publicly owned sewage collection systems having more than one mile of pipeline develop, implement and fund a Sewer System Management Plan (SSMP) which establishes the minimum requirements under which a public collection system must be operated and maintained. The purpose of the Order is to prevent SSOs, and to provide a plan and schedule for measures to be implemented to prevent SSOs, as well as measures to effectively clean up and report the spills.

The purpose for this SSMP Compliance Analysis is to provide an assessment of the <<Agency Name>> overall operation and maintenance policies and procedures to determine if those policies and procedures are in compliance with the new Order. To provide this assessment, Dudek has reviewed all pertinent District documentation and interviewed key District staff. Each element of the Order has been addressed to determine District compliance. This analysis directly follows the Order and its requirements and provides a specific detailed analysis of the level of compliance that the District has achieved for every element of the Order. If compliance deficiencies are found, recommendations are included on how to rectify the deficiency.

The SSMP analysis is built around the WDR and in fact contains the actual Order. This approach was taken to provide the District with a finished SSMP once the recommendations are completed. This analysis also includes the SSMP Development Plan and Schedule which is the first project due under the WDR.

## DEFINITIONS

1. **Sanitary sewer overflow (SSO)** - Any overflow, spill, release, discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system. SSOs include:
    - (i) Overflows or releases of untreated or partially treated wastewater that reach waters of the United States;
    - (ii) Overflows or releases of untreated or partially treated wastewater that do not reach waters of the United States; and
    - (iii) Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.
  
  2. **Sanitary sewer system** – Any system of pipes, pump stations, sewer lines, or other conveyances, upstream of a wastewater treatment plant headworks used to collect and convey wastewater to the publicly owned treatment facility. Temporary storage and conveyance facilities (such as vaults, temporary piping, construction trenches, wet wells, impoundments, tanks, etc.) are considered to be part of the sanitary sewer system, and discharges into these temporary storage facilities are not considered to be SSOs.

For purposes of this Order, sanitary sewer systems include only those systems owned by public agencies that are comprised of more than one mile of pipes or sewer lines.
  
  3. **Enrollee** - A federal or state agency, municipality, county, district, and other public entity that owns or operates a sanitary sewer system, as defined in the general WDRs, and that has submitted a complete and approved application for coverage under this Order.
  
  4. **SSO Reporting System** – Online spill reporting system that is hosted, controlled, and maintained by the State Water Board. The web address for this site is <http://ciwqs.waterboards.ca.gov>. This online database is maintained on a secure site and is controlled by unique usernames and passwords.
  
  5. **Untreated or partially treated wastewater** – Any volume of waste discharged from the sanitary sewer system upstream of a wastewater treatment plant headworks.
  
  6. **Satellite collection system** – The portion, if any, of a sanitary sewer system owned or operated by a different public agency than the agency that owns and operates the wastewater treatment facility to which the sanitary sewer system is tributary.
  
  7. **Nuisance** - California Water Code section 13050, subdivision (m), defines nuisance as anything which meets all of the following requirements:
    - a. Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
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- b. Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
- c. Occurs during, or as a result of, the treatment or disposal of wastes.

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## CHAPTER 1 – PROHIBITIONS AND PROVISIONS

This chapter describes the sewage discharge prohibitions and thirteen provisions prescribed in the Order.

### 1.1 Prohibitions

To meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, the discharger is required to comply with the following prohibitions:

- Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.
- Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is prohibited.

### 1.2 Provisions

The discharger must meet the following thirteen provisions:

1. The Enrollee must comply with all conditions of this Order. Any noncompliance with this Order constitutes a violation of the California Water Code and is grounds for enforcement action.
2. It is the intent of the State Water Board that sanitary sewer systems be regulated in a manner consistent with the general WDRs. Nothing in the general WDRs shall be:
  - (i) Interpreted or applied in a manner inconsistent with the Federal Clean Water Act, or supersede a more specific or more stringent state or federal requirement in an existing permit, regulation, or administrative/judicial order or Consent Decree;
  - (ii) Interpreted or applied to authorize an SSO that is illegal under either the Clean Water Act, an applicable Basin Plan prohibition or water quality standard, or the California Water Code;
  - (iii) Interpreted or applied to prohibit a Regional Water Board from issuing an individual NPDES permit or WDR, superseding this general WDR, for a sanitary sewer system, authorized under the Clean Water Act or California Water Code; or
  - (iv) Interpreted or applied to supersede any more specific or more stringent WDRs or enforcement order issued by a Regional Water Board.

3. The Enrollee shall take all feasible steps to eliminate SSOs. In the event that an SSO does occur, the Enrollee shall take all feasible steps to contain and mitigate the impacts of an SSO.
  4. In the event of an SSO, the Enrollee shall take all feasible steps to prevent untreated or partially treated wastewater from discharging from storm drains into flood control channels or waters of the United States by blocking the storm drainage system and by removing the wastewater from the storm drains.
  5. All SSOs must be reported in accordance with Section G of the general WDRs.
  6. In any enforcement action, the State and/or Regional Water Boards will consider the appropriate factors under the duly adopted State Water Board Enforcement Policy. And, consistent with the Enforcement Policy, the State and/or Regional Water Boards must consider the Enrollee's efforts to contain, control, and mitigate SSOs when considering the California Water Code Section 13327 factors. In assessing these factors, the State and/or Regional Water Boards will also consider whether:
    - (i) The Enrollee has complied with the requirements of this Order, including requirements for reporting and developing and implementing a SSMP;
    - (ii) The Enrollee can identify the cause or likely cause of the discharge event;
    - (iii) There were no feasible alternatives to the discharge, such as temporary storage or retention of untreated wastewater, reduction of inflow and infiltration, use of adequate backup equipment, collecting and hauling of untreated wastewater to a treatment facility, or an increase in the capacity of the system as necessary to contain the design storm event identified in the SSMP. It is inappropriate to consider the lack of feasible alternatives, if the Enrollee does not implement a periodic or continuing process to identify and correct problems.
    - (iv) The discharge was exceptional, unintentional, temporary, and caused by factors beyond the reasonable control of the Enrollee;
    - (v) The discharge could have been prevented by the exercise of reasonable control described in a certified SSMP for:
      - Proper management, operation and maintenance;
      - Adequate treatment facilities, sanitary sewer system facilities, and/or components with an appropriate design capacity, to reasonably prevent SSOs (e.g., adequately enlarging treatment or collection facilities to accommodate growth, infiltration and inflow (I/I), etc.);
      - Preventive maintenance (including cleaning and fats, oils, and grease (FOG) control);
      - Installation of adequate backup equipment; and
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- Inflow and infiltration prevention and control to the extent practicable.

(vi) The sanitary sewer system design capacity is appropriate to reasonably prevent SSOs.

(vi) The Enrollee took all reasonable steps to stop and mitigate the impact of the discharge as soon as possible.

7. When a sanitary sewer overflow occurs, the Enrollee shall take all feasible steps and necessary remedial actions to 1) control or limit the volume of untreated or partially treated wastewater discharged, 2) terminate the discharge, and 3) recover as much of the wastewater discharged as possible for proper disposal, including any wash down water.

The Enrollee shall implement all remedial actions to the extent they may be applicable to the discharge and not inconsistent with an emergency response plan, including the following:

- Interception and rerouting of untreated or partially treated wastewater flows around the wastewater line failure;
- Vacuum truck recovery of sanitary sewer overflows and wash down water;
- Cleanup of debris at the overflow site;
- System modifications to prevent another SSO at the same location;
- Adequate sampling to determine the nature and impact of the release; and
- Adequate public notification to protect the public from exposure to the SSO.

8. The Enrollee shall properly, manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.

9. The Enrollee shall allocate adequate resources for the operation, maintenance, and repair of its sanitary sewer system, by establishing a proper rate structure, accounting mechanisms, and auditing procedures to ensure an adequate measure of revenues and expenditures. These procedures must be in compliance with applicable laws and regulations and comply with generally acceptable accounting practices.

10. The Enrollee shall provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events. Capacity shall meet or exceed the design criteria as defined in the Enrollee's System Evaluation and Capacity Assurance Plan for all parts of the sanitary sewer system owned or operated by the Enrollee.

11. The Enrollee shall develop and implement a written Sewer System Management Plan (SSMP) and make it available to the State and/or Regional Water Board
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upon request. A copy of this document must be publicly available at the Enrollee's office and/or available on the Internet. This SSMP must be approved by the Enrollee's governing board at a public meeting.

12. In accordance with the California Business and Professions Code sections 6735, 7835, and 7835.1, all engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. Specific elements of the SSMP that require professional evaluation and judgments shall be prepared by or under the direction of appropriately qualified professionals, and shall bear the professional(s)' signature and stamp.
13. The mandatory elements of the SSMP are specified below. However, if the Enrollee believes that any element of this section is not appropriate or applicable to the Enrollee's sanitary sewer system, the SSMP program does not need to address that element. The Enrollee must justify why that element is not applicable. The SSMP must be approved by the deadlines listed in the SSMP Time Schedule below.

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## CHAPTER 2 – GOALS

This chapter describes the goals of the Sewer System Management Plan (SSMP). The goal of the SSMP is to provide a documented plan that describes all collection system activities and programs employed by an agency to ensure proper management of all collection system assets. Implementing an SSMP will ensure proper management, operation, and maintenance of all parts of the sanitary sewer system, ultimately helping to reduce and prevent SSOs, as well as mitigate any SSOs that do occur including meeting all applicable regulatory notification and reporting requirements. Commitment to continual improvement will also ensure that the SSMP is both a living and sustainable document that is continually updated, revised, and tailored towards the District's needs. The District is required to comply with the "State Water Resources Control Board (SWRCB), Order No. 2006-0030 DWQ" (Order) on General Waste Discharge Requirements for publicly owned sewage collection agencies having more than one mile of collection pipelines.

### 2.1 Purpose

This element describes the District's stated goals of the SSMP and is intended to clarify the District's desired level of service that it is providing to its customers. The purpose of the Order is to prevent sanitary sewer overflows (SSOs). The District is required to prepare and maintain the SSMP to support this purpose

### 2.2 Goals

Goals that the District must commit to and are identified in the WDR include:

- a. Create/develop a management, operation and maintenance plan and schedule to reduce preventable SSOs.
- b. Respond to and mitigate all SSOs discharging from the District's collection system.
- c. Ensure adequate system capacity for the current and future needs of the District's service area.
- e. Establish measurable performance indicators and manage assets at lowest life cycle costs.
- f. Provide accurate reporting of all SSOs as described by the Order.
- g. Properly fund, manage, operate, and maintain, with adequately trained staff and/or contractors.
- h. All parties involved, shall possess adequate knowledge skills and abilities necessary to ensure the proper management, operation, and maintenance of all parts of the sewage collection system owned and/or operated by the <<Agency Name>>.

As required by the Order, a copy of the SSMP is maintained at the District's Administrative Office (or on the Internet) and is available to the public, state and RWQCB upon request (as discussed in, Section D, Provisions, Item 11) and is available to sanitary sewer system operating and maintenance personnel at all times.

A copy of the Order is included in Volume II of this SSMP. The District will also comply with the SSO "Monitoring and Reporting Program (MRP) component of Order No. 2006-0030 DWQ"

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and all future revisions, included by reference in the Order. A copy of the Monitoring Program is included in Volume II of this SSMP.

### **2.3 About This Document**

The District has prepared this SSMP to ensure compliance with the Order. For ease of use the District has divided its SSMP into two volumes. Volume I contains the actual SSMP (this document) with Volume II containing, where practical, the supporting documentation summarized in the SSMP. The SSMP document is divided into chapters with each chapter dedicated to a specific element of the WDR. Each chapter contains the requirement taken from the WDR and the plan the District utilizes to comply with that requirement. The Compliance Summary of each chapter summarizes the program or activities the District utilizes for compliance. The Compliance Documents section lists the supporting documents, and their location, the District has developed as part of its SSMP. Roles and Responsibilities contain the title and description of duties of the District staff responsible for developing and/or implementing that particular element of the SSMP. A master list including job titles, and job descriptions is maintained in Chapter 3, Description of Organization, of the SSMP. Actual contact information for the listed job titles is maintained in a separate appendix in Volume II of the SSMP. This is done to facilitate staff changes and protect staff privacy.

### **Compliance Analysis**

*Has the agency established its goals consistent with the Order?*

### **Recommendation:**

By developing and implementing programs and procedures to fulfill the above stated goals, the District is in compliance with this element of the WDR. The stated goals meet the minimum requirements of the Order although the District may desire to include additional goals to continue to improve the overall efficiency and operation of the Organization.

### **Key Points**

- Goals are intended to reduce or eliminate SSOs through the proper management, operation, maintenance and funding of the agency. At a minimum the goals should:
- a. Create/develop a management, operation and maintenance plan and schedule to reduce preventable SSOs.
  - b. Respond to and mitigate all SSOs discharging from the District's collection system.
  - c. Ensure adequate system capacity for the current and future needs of the District's service area.
  - d. Establish measurable performance indicators and manage assets at lowest life cycle costs.
  - e. Provide accurate reporting of all SSOs as described by the Order.

The agency may also include additional goals aimed at enhancing overall performance of the organization. Typically, high level statements regarding the overall management

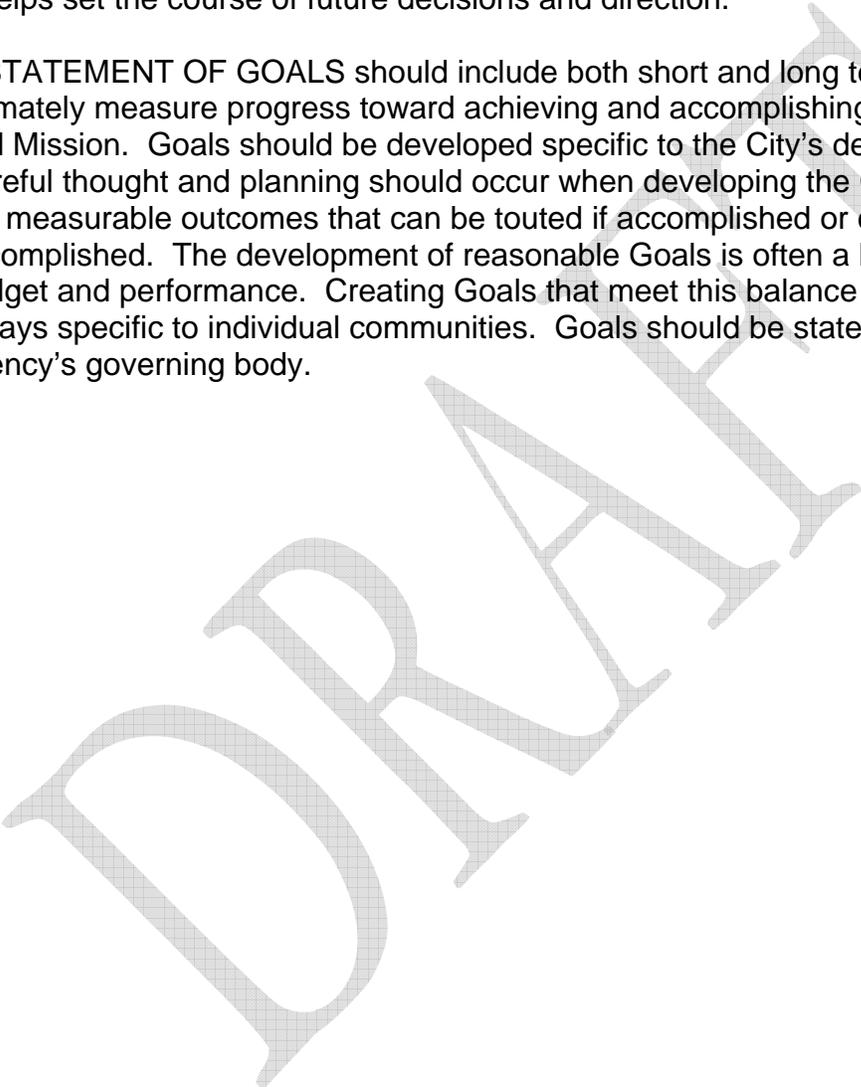
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of a system includes a vision and mission statement, as well as a statement of short and long term goals.

THE MISSION STATEMENT is the first step in the planning process to identify overall functions or missions of the organization. This broad statement of purpose is commonly known as the mission statement.

THE VISION STATEMENT is a clarifying phrase that states where the City is heading. It helps set the course of future decisions and direction.

A STATEMENT OF GOALS should include both short and long term objectives that will ultimately measure progress toward achieving and accomplishing both the stated Vision and Mission. Goals should be developed specific to the City's desired level of service. Careful thought and planning should occur when developing the Goals, because these are measurable outcomes that can be touted if accomplished or criticized if not accomplished. The development of reasonable Goals is often a balancing act between budget and performance. Creating Goals that meet this balance is often difficult and always specific to individual communities. Goals should be stated and adopted by the agency's governing body.



## CHAPTER 3 – DESCRIPTION OF ORGANIZATION

This chapter describes the District's organization and chain of communication. The Order requires the following:

- (a) The name of the responsible or authorized representative as described in Section J of this Order.
- (b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and
- (c) The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

### 3.1 Name of Responsible or Authorized Representative

<<Insert the name of the District's authorized representative>> is the District's authorized representative listed on the Notice of Intent (NOI) and is responsible for the certification of SSO reports.

### **Compliance Analysis**

*Has the agency named a responsible party or authorized representative compliant to the Order and is that persons name and contact information available?*

### **Recommendation:**

#### 3.1.1 Administrative and Maintenance Positions

The Order requires the names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation.

#### 3.1.2 Compliance Summary

<<Insert a summary of the positions and their responsibilities for the development and implementation of the SSMP>>.

#### 3.1.3 Compliance Documents

The following lists and organizational charts detailed the filled positions of our organizational structure.

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*<< Insert or include a reference to the location of a listing including names and telephone numbers of all administrative and maintenance positions responsible for implementing the specific measures of the SSMP>>*

*<<Insert or include a reference to the location of an Organizational chart, by job title, for compliance with the order including a descriptive narrative of each positions responsibility>>*

### **3.1.4 Roles and Responsibilities**

The roles and responsibilities of each position in the organization chart are listed here.

*<< Insert a descriptive narrative of responsibilities for all administrative and maintenance positions responsible for implementing the specific measures of the SSMP>>*

### **Compliance Analysis**

*Does the agency have a listing of positions, names and phone numbers of all administrative and maintenance personnel responsible for implementing the elements of the SSMP?*

*Does the agency have an organizational chart that reflects all administrative and maintenance personnel's responsibilities including a descriptive narrative of each position's responsibilities?*

### **Recommendation:**

Prepare a listing of all employees who will have responsibility for the development and implementation of the SSMP. This would be a master listing and would include the name, title, telephone number and a brief description of their job duties. This would be the only place where an employee's name and telephone number would appear and would be the only area that would require periodic updating of employees or their job titles change. Only the position title and a brief narrative would appear under the Roles and Responsibilities section of each element.

Complete the Compliance Summary with a brief description of the District's organization. Complete Compliance Documents with a listing of appropriate supporting documents and their location.

## **3.2 Chain of Communication**

The Order requires the chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

### **3.2.1 Compliance Summary**

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The following flow chart shows the chain of communication for reporting SSOs. It starts with the receipt of a complaint or other information, and includes the name and title of the person responsible for reporting SSOs to the SWRCB, Riverside County Department of Environmental Health (RCDEH), and State Office of Emergency Services (OES). Reporting to the OES is required only if the discharge is 1,000 gallons or larger. This flowchart is part of the SSO Reporting Guidelines process developed to manage the reporting process, and exists in the District's current SSO Emergency Response Plan.

<<Insert or include a reference to the SSO Reporting Flow Chart>>

### **3.2.2 Compliance Documents**

The following organization chart provides the names, titles, and phone numbers for SSO contacts provided in the chain of communication flow chart.

<<Insert or include a reference to the SSO Reporting org. chart with names, phone numbers, and titles, as well as names/addresses/phone numbers of required agencies>>

### **3.2.3 Roles and Responsibilities**

The roles and responsibilities of each chain (position) in the line of communications are described below:

<<Identify department roles and responsibilities, related to SSOs, including receiving notification of possible SSOs; responding, handing, notifying, and reporting to the regulators;>>

### **Compliance Analysis**

*Has the agency developed a chain of communication for the reporting of SSOs including the name of the person responsible for reporting to the SWRCB and other applicable agencies?*

### **Recommendation:**

### **Key Points**

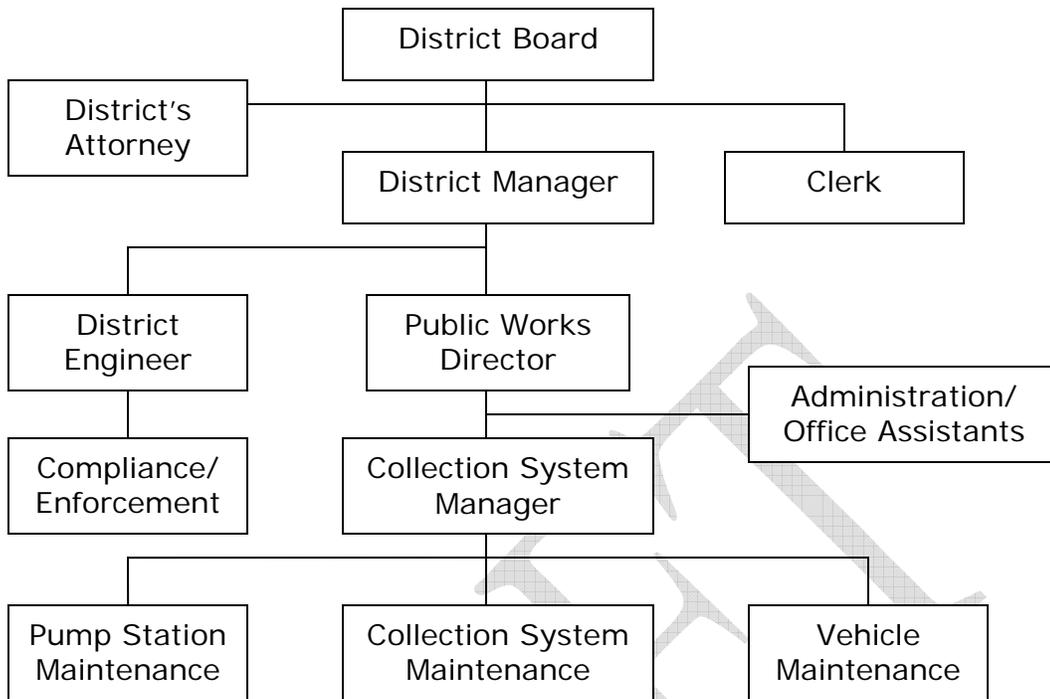
Personnel responsible for developing and implementing the agency's SSMP as well as the hierarchy for reporting SSOs can be illustrated using simple organizational charts. Required contact information can be placed in an appendix outside of the actual SSMP document so the information can be updated without having to update the actual SSMP. The following illustrates the typical positions and their associated activities, duties, and responsibilities associated with the development and implementation of the SSMP. A similar chart can depict the flow of reporting SSO and the duties of those responsible for SSO reporting.

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Organization

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**District Board**

Establishes policies, reviews and accepts formal plans, sets overall City direction, authorizes funds for projects/plans/programs, general overview of upper management (Mayor, City Manager, City Attorney), conducts public meetings and hearings, approves SSMP.

**Attorney**

The City's attorney develops and approves legal documents, provides legal advice, conducts litigation, and attends public meetings.

**District Manager**

Responsible for the day-to-day management and operation of the City under the direction of the City Council. Specifically the City Manager establishes procedures, plans strategy, leads staff, allocates resources defined in the City budget, delegates responsibility, authorizes outside contractor to perform services, and serves as overall public information officer.

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Engineer

Responsible for the development and implementation of city design and construction standards. Quite often responsible for 3<sup>rd</sup> party plan check as well as construction and building inspection. Provides engineering drawings, plans, and specifications for projects within the city. And is also responsible for developing or overseeing engineering studies such as hydraulic modeling, master planning, and CIP program development.

Utilities Director

Responsible for the management and operation of the Public Works Department, including the operation and management of the sanitary sewer system. Reports to the City Manager

Collection System Manager

Responsible for the operation and maintenance activities of the sanitary sewer system, including direct supervision and scheduling of all maintenance crews, and regular scheduling of maintenance activities. Coordinates field operations and prepares and implement overflow emergency response plan, leads emergency response, investigates and reports SSOs and trains maintenance workers and field crews.

Maintenance Workers

Office Assistants

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## CHAPTER 4 – LEGAL AUTHORITY

This chapter describes the legal authority to implement the SSMP plans and procedures.

The SSMP must include the legal authority, through sewer use ordinances, service agreements, or other legally binding procedures, to:

- (a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);
- (b) Require that sewers and connections be properly designed and constructed;
- (c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
- (d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and
- (e) Enforce any violation of its sewer ordinances.

### 4.1 Compliance Summary

*<<Insert a summary of the District's legal authorities and indicate how they address the legal authority requirements of the Order>>*

### 4.2 Compliance Documents

The legal authority for enacting the SSMP programs and policies are included in the following Ordinances. These, and other Ordinances adopted to amend existing ordinances, may be reviewed at the District's Administrative Offices located at 22646 Temescal Canyon Road Corona, CA 92883.

- *<<Insert Ordinance Reference>>*
- *<<Insert Ordinance Reference>>*
- *<<Insert Ordinance Reference>>*

### 4.3 Roles and Responsibilities

The roles and responsibilities for enforcement of the legal authority to enact the SSMP programs and policies are derived from acts of the District's governing Board. Interpretation of the enabling state legislation giving authority to the District is provided by the District's Legal Counsel.

*<<Insert Title>>*

*<<Insert description of responsibilities>>*

*<<Insert Title>>*

*<<Insert description of responsibilities>>*

### Compliance Analysis

*Does the agency have in place the necessary legal authorities to satisfy the required legal authorities and where are they located?*

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***Recommendation:***

***Key Points***

Some agencies may refer to or have adopted the Uniform Plumbing Code (UPC) or the California Plumbing Code (CPC), which may satisfy the necessary legal authorities for acceptable plumbing design criteria. Other agencies may have the necessary legal authorities spread throughout their municipal codes, ordinances, and/ or resolutions. Item C above also refers to easements and the ability of the agency to have access to all of its collection system assets. If any part of the legal authority does not exist or needs to be updated, describe the approach and time schedule that will be utilized to comply with this section.

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## CHAPTER 5 – OPERATIONS AND MAINTENANCE

The agency shall properly, manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the agency, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.

The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:

- (A) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities;
- (B) Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;
- (C) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;
- (D) Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
- (E) Provide equipment and replacement part inventories, including identification of critical replacement parts.

### 5.1 Mapping

The requirement for this section is to maintain an up-to-date map of the collection system showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and stormwater conveyance facilities.

#### 5.1.2 Compliance Summary

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*<<Insert a narrative summary of the agency's activities to maintain and update their mapping of their collection system assets including pipelines, manholes, pumping facilities and other collection system appurtenances, also include storm drain (MS4) facilities>>*

### **5.1.1 Compliance Documents**

The documents supporting compliance with the requirements for mapping are as follows:

- *<<Map Books>>*
- *<<GIS system?>>*
- *<<Storm water mapping system>>*

### **5.1.2 Roles and Responsibilities**

The roles and responsibilities of staff supporting compliance with the mapping requirement of the Operations and Maintenance Program are as follows:

*<<List positions, roles, and responsibilities for maintaining system mapping>>*

### **Compliance Analysis**

*Does the agency have up-to-date mapping of their facilities including storm water system within their jurisdiction even if they do not own the storm water facilities?*

*Does the agency have a program in place to ensure that its mapping remains up-to-date?*

### **Recommendation:**

Complete the Compliance Summary with a brief description of the District's mapping capabilities. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for developing and implementing the program.

### **Key Points**

Describe the mapping system that the agency utilizes (GIS, electronic, paper, etc.) and how maps are kept up to date including how mapping for storm water facilities not owned or operated but within the agency's geographical boundaries is obtained and updated. If no maps or mapping system is in place, describe what approach and time schedule will be utilized to prepare mapping for the collection system that will provide adequate support for the management, planning, operation and maintenance of the system.

## **5.2 Preventive Maintenance Program**

The Order requires the District to describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and

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cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders.

### **5.2.2 Compliance Summary**

*<<Insert a narrative describing the agency's preventive maintenance program including how problem areas are handled. Description should include activities that are performed by agency staff as well as activities that are provided under contract. Also include a description of how maintenance is scheduled and maintenance records maintained.>>*

### **5.2.3 Compliance Documents**

Documents which support compliance of this section include the following:

- *<<Written Preventive Maintenance Program>>*
- *<<Work Orders or other tracking system and their location>>*
- *<<...>>*

### **5.2.4 Roles and Responsibilities**

The staff positions and their responsibilities for the agency's Preventive Maintenance Program are as follows:

*<< Insert the positions and their responsibilities for the Preventive Maintenance Program and maintenance scheduling record keeping.>>*

### **Compliance Analysis**

*Does the agency have a comprehensive written Preventive Maintenance Program?*

*Does the agency have a method of scheduling and tracking maintenance on the collection system asset?*

*Other District maintenance activities.*

### **Recommendation:**

Complete the Compliance Summary with a brief description of the District's O&M and related programs. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for developing and implementing the program.

### **Key Points**

An agency's maintenance program should consist of the O&M practices the agency utilizes to maintain all of its facilities including routine line cleaning and inspection

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(CCTV and visual), pump or lift station maintenance and inspection, hot spot or trouble spot identification and maintenance. The maintenance program should also describe how complaints, service calls and alarm conditions are responded too. Additionally, the maintenance program should have a means of scheduling and tracking maintenance needs and activities as well as evaluating the effectiveness of the maintenance performed.

### **5.3 Rehabilitation and Replacement Plan**

Every agency must develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. The rehabilitation and replacement plan should include a capital improvement plan (CIP) that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan

#### **5.3.1 Compliance Summary**

*<<Insert a description on how the agency has complied with all of the minimum requirements of the rehabilitation and replacement segment of the operations and maintenance program. Include a description of the frequency and methods used for pipeline and manhole inspections (CCTV) and condition assessment. Discuss the methods used to prioritize deficiencies and the implementation of short and long-term rehabilitation strategies to address the deficiencies. Also discuss the agency's CIP, scheduling for R&R, and funding sources for R&R.>>*

#### **5.3.2 Compliance Documents**

The documents supporting compliance with the rehabilitation and replacement plan requirements are as follows:

- *<<CCTV Inspection Program>>*
- *<<Condition Assessment and Defect Prioritization>>*
- *<<Capital Improvement Plan and Schedule>>*
- *<<Funding Sources>>*
- *<<....>>*

#### **5.3.3 Roles and Responsibilities**

The staffed positions and their roles and responsibilities in supporting compliance with the rehabilitation and replacement plan requirements are as follows:

*<<Insert information on rehabilitation and replacement plan Roles and Responsibilities>>*

### **Compliance Analysis**

*Does the agency have a comprehensive inspection and condition assessment program?*

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*Does the agency have an up to date CIP that addresses system deficiencies and provides a schedule for the short and long term remediation of the deficiencies?*

*Does the agency have a funding mechanism in place that will provide adequate funding (reserves) for the short and long term R&R through the CIP?*

**Recommendation:**

Complete the Compliance Summary with a brief description of the District's rehabilitation and replacement programs. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for developing and implementing the program.

**Key Points**

An agency's rehabilitation and replacement (R&R) plan should describe how the agency inspects and evaluates the condition of its collection system assets. As information on the condition of these assets is obtained, the plan should describe how this information is utilized to develop a CIP program to prioritize, schedule and fund rehabilitation or replacement projects. The R&R plan needs to include immediate as well as long range (multi-year) projects.

**5.4 Training Program**

The District is required to provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and to require contractors to be appropriately trained.

**5.4.1 Compliance Summary**

*<<Insert a description of how the agency provides training for its staff to provide for the operations and maintenance of the system. Also include a description of what procedures the agency utilizes to ensure that any contractors used are adequately trained for the agencies needs.>>*

**5.4.2 Compliance Documents**

The following documents demonstrate they type of training provided to staff and what training requirements are required of contractors:

- *<<Type of Training Records and their location>>*
- *<<Documentation for contractors requirements and location>>*
- *<<...>>*

**5.4.3 Roles and Responsibilities**

The staffed positions and their roles and responsibilities in supporting compliance with the staff and contractor training requirements are as follows:

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<<Insert information on positions for training roles, and responsibilities>>

### **Compliance Analysis**

*Does the agency have a program for the ongoing training of its staff compliant with the Order?*

*Does the agency require or endorse CWEA Operator Certification?*

*Does the agency have a method or standard for ensuring that any contractors that are utilized have the appropriate training and skill level to provide service to the agency?*

### **Recommendation:**

Complete the Compliance Summary with a brief description of how the District's provides training of its staff including CWEA certification. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for training District staff.

### **Key Points**

Training is a key component to an effective O&M program. How and to what level the agency provides or requires training for its staff should be described. This should include whether the agency requires or encourages CWEA certification. Include measures the agency utilizes to ensure that contractors are adequately trained. If no training exists, describe how the agency intends to develop and implement (including a time schedule for implementation) a training program. All training must be documented and should include at least the training date, training topic with a brief description, name of trainer, and names of attendees.

## **5.5 Equipment and Parts Inventories**

Each agency is required to provide equipment and replacement part inventories, including identification of critical replacement parts for the operation and maintenance of its sewer collection system.

### **5.5.1 Compliance Summary**

<<Insert a description of how the agency maintains an inventory of equipment and parts, including identification of critical replacement parts, to adequately maintain its collection system.>>

### **5.5.2 Compliance Documents**

The documents supporting compliance with the requirement to maintain an inventory of equipment and parts including identification of critical parts, are as follows:

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- <<Equipment Inventory>>
- <<Parts Inventory>>
- <<Identification of Critical Parts>>

### **5.5.3 Roles and Responsibilities**

The staffed positions and their roles and responsibilities in supporting compliance with maintaining an inventory of equipment and parts, including critical parts, are as follows:  
<<Insert information on positions for inventory control roles, and responsibilities>>

#### **Compliance Analysis**

*Does the agency maintain an inventory of its equipment and replacement parts?*

*Has the agency identified any critical replacement parts?*

*What method does the agency use to ensure critical replacement parts availability?)*

#### **Recommendation:**

Complete the Compliance Summary with a brief description of how the District's develops and maintains its inventory system. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff to develop and maintain the District's inventory.

#### **Key Points**

The agency must develop and maintain an inventory of equipment and replacement parts necessary to properly operate and maintain the collection system. Included should be an inventory of any critical replacement parts including parts that traditionally have a long lead time. If parts are not on hand, what strategy does the agency have to acquire necessary parts or equipment in a timely manner i.e. mutual assistance programs with neighboring agencies, standing agreements with contractors or vendors, etc.

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## CHAPTER 6 – DESIGN AND PERFORMANCE PROVISIONS

This chapter references the design and construction standards & specifications for new sewer systems, pump stations, and other appurtenances, and for the rehabilitation and repair of existing sewer systems. Also included are the procedures and standards for the inspection and testing of these facilities. The Order requires the following:

- (b) Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and
- (c) Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

### 6.1 Compliance Summary

*<<Insert a description of how the agency provides construction standards and specifications for the installation of new sewers and for the rehabilitation and repair of existing collection system infrastructure. Include a description of what procedures and standards are utilized for the inspection and testing of new and rehabilitated facilities.>>*

### 6.2 Compliance Documents

The documents used for design and performance evaluations include the following:

- *<<Standard specifications and their location>>*
- *<<Green Book or other documents and their location>>*

### 6.3 Roles and Responsibilities

The positions, roles, and responsibilities of the Design and Performance staff are as follows:

*<<Insert information on positions for design and testing, roles, and responsibilities>>*

#### **Compliance Analysis**

*Does the agency have an up to date set of standards or specifications for the construction, repair and testing of its sewer collection system infrastructure?*

*Does the agency utilize the services of a professional California registered engineer for its design, construction and repair?*

*Does the agency utilize the Green Book?*

**Recommendation:**

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Complete the Compliance Summary with a brief description of how the District provides the proper design and performance of its collection system. This should also include a summary of how the District completes its acceptance testing and how the District ensures adequate downstream capacity as new facilities or developments are completed. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities of the District's staff for the proper design and performance of the collection system.

***Key Points***

This section is to ensure the agency has in place adequate design and construction standards and specifications for the construction, inspection and testing of new collection system pipelines, pump or lift stations and other appurtenances and for the rehabilitation or repair of existing facilities. Some agencies may have their own standards and specification while others may rely on the current additions of Standard Publication for Public Works Construction (Green Book), Standard Plans for Public Works Construction and the California Plumbing Code. It should also be noted that the agency utilizes the services of a professional California registered engineer for the design of its construction or R&R projects. If design and construction standards are in place, a statement to that effect and a documented review will meet the requirement. If design and construction standards are not in place, the agency should how they intend to comply including a timetable for compliance. The agency's procedures for acceptance testing of new, rehabilitated, or repair projects as well as how the agency ensures adequate capacity (including treatment) downstream of new facilities or development should be noted.

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## CHAPTER 7 – OVERFLOW EMERGENCY RESPONSE PLAN

Under the Order, each agency shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

- a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- b) A program to ensure an appropriate response to all overflows;
- c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification;
- d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

### 7.1 Compliance Summary

*<<Insert a description of the agency's Overflow Emergency Response Plan that summarizes the minimum requirements (a – f) above.>>*

### 7.2 Compliance Documents

The compliance documents that detail the agency's Overflow Emergency Response Plan are as follows:

- Sewage Spill Prevention and Response Plans - located
- <<...>>

### 7.3 Roles and Responsibilities

The staff positions, roles, and responsibilities for the Overflow Emergency Response Plan are as follows:

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<<Insert information on positions, roles, and responsibilities>>

### **Compliance Analysis**

*Does the agency have a written Overflow Emergency Response Plan(OERP)?*

*Does the OERP address the proper notification procedures to ensure all required first responders, including contractors, and regulatory agencies are notified in a timely manner?*

*Does the OERP ensure an appropriate response to all overflow events?*

*Does the OERP provide for adequate and proper notification to the regulatory agencies when a potential threat to public health or the waters of the U.S. is involved?*

*Does the OERP require reporting in accordance with the MRP?*

*Does the OERP identify the officials who will receive immediate notification?*

*Does the OERP provide for adequate staff and contractor training to deal with SSOs?*

*Does the OERP include a plan for traffic, crowd or other control mechanisms that may be required when responding to an SSO?*

*Does the OERP ensure that all reasonable steps will be taken to protect the waters of the U.S. including monitoring to determine the impact of the SSO?*

### **Recommendation:**

Complete the Compliance Summary with a brief description of the District's Overflow Emergency Response Plan. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for developing and implementing the Overflow Emergency Response Plan.

### **Key Points**

The Overflow Emergency Response Plan is simply how the agency responds to SSOs. It may be a stand alone plan or part of the agency's overall emergency program.

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Should the agency not have a written response plan start by documenting the procedures that are currently utilized when an SSO occurs. To be effective and compliant the Overflow Emergency Response Plan should include:

- Means of overflow detection
- Procedures for first responders
- Mitigation procedures including steps to prevent the spill from entering the waters of the United States, spill recovery and cleanup
- Emergency procedures including crowd and traffic control to limit public access
- Documentation of all activities related to an SSO including investigation of cause
- Notification procedures to all appropriate regulatory agencies i.e. local health department, regional board, fish and game, OES, etc.
- Reporting procedures consistent with the MRP
- Listing of equipment and contact information for contractors or local suppliers
- Spill response training for staff and contractors

Contact information should be kept in an appendix and not the SSMP document to allow for easy updating without having to update the SSMP. If the agency does not have an Overflow Emergency Response Plan, document the process the agency will utilize to formulate a plan and a time schedule for its implementation.

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## CHAPTER 8 – FATS, OILS, AND GREASE CONTROL PROGRAM

Under the Order, each *agency* is required to evaluate its service area to determine whether a FOG control program is needed. If the *agency* determines that a FOG program is not needed, the *agency* must provide justification for why it is not needed. If FOG is found to be a problem, the *agency* must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;
- c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;
- f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

### 8.1 Compliance Summary

*<<Insert a description of the District's FOG program including a summary of its provisions and how it is implemented. Include any studies (i.e. FOG Characterization) that have been completed or pending and any funding source for the program. >>*

### 8.2 Compliance Documents

The FOG control program activities are documented under the following ordinances, reports, and studies:

- *<<Insert Ordinances or other compliance documents>>*

### 8.3 Roles and Responsibilities

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The positions, roles, and responsibilities of the staff in the FOG control program are as follows:  
<<Insert information on the staff roles and responsibilities for the development and implementation of the FOG control program. >>

### **Compliance Analysis**

*Does the agency have a FOG problem? If not document the reasons why the agency does not need to comply with this requirement.*

*If the Agency has a FOG problem:*

*Does the FOG control program have a plan and schedule for public education to promote the proper disposal of FOG?*

*Does the FOG control program provide for the proper disposal of FOG generated within the Agency's jurisdiction including a list of acceptable disposal sites?*

*Is there a FOG ordinance or other legal authority that prohibits the discharge of FOG into collection system?*

*Does the FOG control program require the installation of grease removal devices including design standards and maintenance requirements for grease removal devices?*

*Does the FOG control program require the use of BMPs including record keeping and reporting requirements?*

*If required, what are the minimum required BMPs?*

*Does the FOG control program or ordinance provide the authority to inspect grease producing facilities?*

*Does the FOG control program provide the legal authority and ability to enforce the FOG program?*

*Does the Agency have sufficient staff to inspect and enforce the FOG program or does the agency utilize a contractor for assistance?*

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*Has the Agency identified segments of the collection system that are prone to FOG blockages and has an enhanced cleaning program been established for these trouble areas?*

*Has the Agency developed source control measures for all sources of FOG that discharge into known trouble areas?*

**Recommendation:**

Complete the Compliance Summary with a brief description of the District's FOG program. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for developing, updating and implementing the District's FOG program.

**Key Points**

To determine if the agency has a FOG problem a FOG Characterization Study can be performed. To perform this study, analyze the agency's hot or trouble spots, SSO reports and line cleaning and inspection reports to determine if FOG is an issue. Determine if there are food service establishments in the area where hot spots or SSOs occur. CCTV can be useful in determining if FOG is being discharged from laterals in the areas of concern. If the analysis determines that FOG is not a problem, this should be documented and stated in the SSMP as to why the agency does not need to implement a FOG control program.

If FOG generated from commercial food service establishments is negatively impacting the agency's collection system by causing or having the potential to cause SSOs, a FOG control program must be developed and implemented. An effective FOG control program should:

- Identify hot spots or area requiring additional maintenance due to FOG
  - Identify which food service establishments are discharging into hot spot or increased maintenance areas
  - Establish some means of administrative control for food service establishments such as requiring FOG discharge permits
  - Establish and require kitchen best management practices (i.e. removal of garbage grinders, installation of drain screens, scraping off plates of food waste into garbage containers, rendering recyclable cooking oils, dry wiping of pots, pans and utensils, training of employees in FOG reduction practices, etc.)
  - Require the installation of grease removal devices
  - Develop an inspection program to ensure that grease removal devices are being properly maintained and FOG reduction practices are being utilized
  - Provide for enforcement actions (legal authority) for food service establishments that fail to comply
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For residential FOG concerns an educational outreach may be established to inform residents of the proper methods of handling FOG.

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## CHAPTER 9 – SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

The Order requires that each agency shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

- a) **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
- b) **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and
- c) **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.
- d) **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14.

### 9.1 Compliance Summary

*<<Insert a description of how the agency ensures that sufficient capacity exists for dry and wet weather peak flows. Include what steps the agency takes to ensure proper design and how hydraulic deficiencies are remedied. Discuss the CIP program and how the agency prioritizes and schedules CIP projects.>>*

### 9.2 Compliance Documents

The documents used for system evaluation and capacity assurance are as follows:

- *<<Insert compliance documents and their location>>*

### 9.3 Roles and Responsibilities

*<<Insert information on the staff roles and responsibilities for the development and implementation of the capacity assurance and CIP programs. >>*

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### **Compliance Analysis**

*Does the agency have a capacity problem?*

*Has the agency isolated areas of capacity concerns?*

*Is the system designed to handle dry and wet weather peak flows?*

*Has the system been designed for a specified storm event?*

*Has the system been modeled?*

*How often is the model updated?*

*Does the agency have an I&I problem or program?*

*How are deficiencies analyzed and prioritized?*

*What types of procedures are in place to enhance capacity?*

*Does the agency have an up to date CIP?*

*How is the CIP funded, prioritized and scheduled?*

*Is there a current CIP schedule that includes anticipate completion dates?*

### **Recommendation:**

Complete the Compliance Summary with a brief description of how the District provides its system evaluation and how capacities are determined and evaluated including a summary of the updated CIP process. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for evaluating the District's collection system assets and making recommendations for the CIP.

### **Key Points**

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The majority of the requirements of this element are normally addressed in the sewer master plan. System evaluation is critical in determining areas of hydraulic deficiency. The evaluation should at least include visual and CCTV inspections, maintenance practices and history, estimations of peak dry and wet weather flows (including flows from SSOs that escaped the system), flow and rainfall monitoring, infiltration/inflow (I&I) issues, current and future land use projections, and system design criteria. Data from the evaluation can be used to assist in the development of a system model. Models can be as simple as spreadsheet models (small systems) or comprehensive computer based models (larger systems). A properly designed and accurately calibrated model will assist the agency in pinpointing capacity or other hydraulic deficiencies, and assist in establishing the necessary design criteria for the system. As deficiencies become known, they should be prioritized and included in the CIP. The CIP is required to include a schedule of completion dates and funding sources for all projects.

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## CHAPTER 10 – MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

Under the Order, there are three key monitoring, measurement, and program modification requirements. They are to:

- a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
- b) Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;
- c) Assess the success of the preventative maintenance program;
- d) Update program elements, as appropriate, based on monitoring or performance evaluations; and
- e) Identify and illustrate SSO trends, including: frequency, location, and volume.

### 10.1 Compliance Summary

*<<Discuss how the agency developed appropriate methods to monitor and measure the effectiveness of the SSMP and its implementation. Also discuss how the program is modified based upon its performance evaluation.>>*

### 10.2 Compliance Documents

The compliance documents are as follows:

- *<<insert list of documents, checklists, etc.>>*
- *<<Spill reports>>*
- *<<...>>*

### 10.3 Roles and Responsibilities

The positions, roles, and responsibilities are as follows:

*<<insert information on positions, roles, and responsibilities>>*

### **Compliance Analysis**

*Does the agency have a program in place for monitoring the effectiveness of a given program?*

*Does the agency have a procedure for up dating its documentation?*

*Does the agency analyze its spill reports and spill history?*

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*How does the agency evaluate the effectiveness of its preventive maintenance program, EORP, and other SSMP elements?*

***Recommendation:***

Complete the Compliance Summary with a brief description of how the District monitors and makes adjustments to its programs. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for monitoring the effectiveness of the SSMP and recommending changes to enhance its effectiveness.

***Key Points***

This section is intended to be an ongoing evaluation of how well your SSMP is performing in achieving the goals established by the agency. To accomplish this, the agency needs to develop a process that will ensure that the SSMP remains current and effective. This will require staff to analyze the effectiveness of the SSMP by establishing and monitoring performance indicators for the agency's maintenance program, SSO frequency and history (including cause), FOG program, CIP progress, funding and other programs. Reports from a CMMS can be very useful in analyzing the programs effectiveness. Peer review by another agency may also be helpful. Modifications to improve the SSMP should be based upon this ongoing analysis to improve the effectiveness of the collection system operation. Management should be kept informed of the effectiveness of the SSMP and major revisions to the SSMP may require the approval of the agency's elected officials.

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## CHAPTER 11 – PROGRAM AUDITS

As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

### 11.1 Compliance Summary

*<<Insert a statement of what procedures the Agency utilizes to review all of the SSMP elements, how they have been implemented and their level of effectiveness. The audit should be a summary of the Monitoring, Measurement, and Modifications element of the SSMP over the past audit period. Deficiencies should be noted and include corrective actions schedules.>>*

### 11.2 Compliance Documents

The documents used for audit evaluations include the following:

- *<<insert list of documents, checklists, etc.>>*
- *<<...>>*

### 11.3 Roles and Responsibilities

The positions, roles, and responsibilities of the audit staff are as follows:  
*<<insert information on positions, roles, and responsibilities>>*

#### **Compliance Analysis**

*Does the agency have a program in place for conducting a program audit?*

*Does the agency have a procedure for up dating its documentation?*

*Does the agency analyze its spill reports and spill history?*

*Has the agency created a list of SSMP deficiencies?*

*Has the agency established a means and a schedule for correcting outstanding SSMP deficiencies?*

#### **Recommendation:**

Complete the Compliance Summary with a brief description of how the District will perform SSMP audits. Complete Compliance Documents with a listing of appropriate

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supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for performing the SSMP audits.

### **Key Points**

Information obtained from the monitoring, measurement and program modifications section of the SSMP can be summarized to assist in perform the SSMP audit. Revisions should be identified along with improvements to the system's operation. The SSMP implementation process should be included and justification presented for any delay in the development or implementation of any SSMP element or elements. Review additions or improvements made to the collection system during the current audit period and describe planned additions and improvements for the upcoming audit period.

An SSMP audit program should be specific to the sanitary sewer system but agency-wide procedures should be incorporated to ensure program sustainability. Consideration of the following program elements will help the Agency develop a comprehensive audit program to ensure agency-wide compliance

Document Control – procedures to ensure that all documents are up to date and the most recent documents are available and referenced. This process will also ensure that historical documents are kept for future reference.

Training – programs and mechanisms in place to ensure necessary training is specifically identified and all staff is up to date with required training. Processes needed to ensure that required expertise and skills are captured in the duty statement and assurances that they are accurate and up to date. Training should include on the job requirements, safety, required licenses and/or certificates, and professional development.

Targets and Objectives – Developing targets and objectives necessary to measure performance and gauge efficiency should be developed and used in the audit process.

Data Management – Based upon the measures identified in the Measurement, Monitoring and program modification section described in chapter 10, ensure that there is a formal program in place to measure effective implementation of this program at all levels of the organization. Make sure that all decisions are tied to both defined levels of service and relayed through priorities and ultimately tied into the budgetary process.

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## CHAPTER 12 – COMMUNICATIONS

The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.

The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

### 12.1 Compliance Summary

*<<Describe what efforts the agency has made to include the public and other interested parties in the development and implementation of the SSMP. Describe the agency's communication plan for any satellite collection system that discharges into the agency's collection system.>>*

### 12.2 Compliance Documents

The documents used for the communications program include the following:

- *<<Public educational outreach programs>>*
- *<<Agency's website address if used>>*
- *<<Listing of satellite dischargers>>*

### 12.3 Roles and Responsibilities

The positions, roles, and responsibilities of the communications staff are as follows:

*<<Insert information on positions, roles, and responsibilities>>*

### **Compliance Analysis**

*Does the agency have a program in place for educational public outreach?*

*Does the agency have a procedure for allowing public comment or participation during the development and implementation of a program?*

*Does the agency have a newsletter or other means of communicating with the public that could be utilized with the SSMP effort?*

*Does the agency have a list of all satellite systems (a satellite system could be a private development, mobile home park, shopping mall, etc.) that discharge to them?*

### **Recommendation:**

Complete the Compliance Summary with a brief description of the District's communication and outreach program. Complete Compliance Documents with a listing

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of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for communication and outreach.

***Key Points***

A good communications program should keep the agency's constituents informed about the agency's progress in developing and implementing the SSMP while encouraging public participation. The program should demonstrate the short and long term benefits of implementing the SSMP by providing effective asset management to the publicly owned system while protecting the health and welfare of all who utilize it.

Communication programs are a perfect opportunity to show the public what they are getting for their money and can include reports on performance and may be related to other communities, awards, CIP projects, justification for expenditures, talk about consequences, etc. Newsletters, public service announcements, involvement in community events, bill stuffers, meetings with homeowners and service groups, and the agency's website are all effective means of communicating with the public the agency serves. It is also important to establish a communications bridge with satellite systems that discharge to the public system. Satellite systems may be developments that are not dedicated to the public agency, mobile home parks, apartment complexes, shopping malls, etc.

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## CHAPTER 13 – GENERAL COMPLIANCE REQUIREMENTS

### 13.1 SSMP and Program Certification

Both the SSMP and the District's program to implement the SSMP must be certified by the District to be in compliance with the requirements set forth above and must be presented to the District's governing board for approval at a public meeting. The District shall certify that the SSMP, and subparts thereof, are in compliance with the general WDRs within the time frames identified in the time schedule provided in subsection D.15.

In order to complete this certification, the District's authorized representative must complete the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form, and sending the form to:

State Water Resources Control Board  
Division of Water Quality  
Attn: SSO Program Manager  
P.O. Box 100  
Sacramento, CA 95812

The SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification by the governing board of the District is required in accordance with D.14 when significant updates to the SSMP are made. To complete the re-certification process, the District shall enter the data in the Online SSO Database and mail the form to the State Water Board, as described above.

#### 13.1.1 Compliance Summary

*<<Describe the SSMP and implementation program adoption process including the number of the adopting legal document and the date of adoption. Include dates of Public Hearing or other means utilized during the adoption process.>>*

#### 13.1.2 Compliance Documents

The following documents provide the legal basis for the <<Agency Name>> adoption of the SSMP and implementation program.

- *<<Resolution, Ordinance, etc utilized for adopting SSMP>>*

#### 13.2.3 Roles and Responsibilities

The positions, roles, and responsibilities for adopting the SSMP and the program to implement the SSMP are as follows:

*<<Insert list of positions responsible for the adoption process>>*

### Compliance Analysis

*How will the agency adopt the SSMP and implementation program?*

*Will the SSMP and implementation program have to be reviewed by legal council?*

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**Recommendation:**

Prepare a document (SSMP Development Plan and Schedule) for presentation to the District Board of Directors outlining the WDR/SSMP process including a schedule of required of the deadlines for completion of the various SSMP elements.

Complete the Compliance Summary with a brief description of how the District certified (re-certified) the SSMP and what type of legal method is/was used. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible for certifying (re-certifying) the SSMP.

**Key Points**

The Order allows the agency to certify that its SSMP is in compliance and meets the requirements set forth in the Order. This is done through the adoption of the SSMP by the agency's governing body at a public meeting. The SSMP must be updated and re-certified every five years after the initial certification. The agency's SSMP Development Plan and Schedule (the first required SSMP component) must be presented to the agency's governing body for certification at the start of the SSMP development process.

**13.2 WDRs, and SSMP Availability, Records Maintenance and Access.**

A copy of the general WDRs and the certified SSMP shall be maintained at appropriate locations (such as the Enrollee's offices, facilities, and/or Internet homepage) and shall be available to sanitary sewer system operating and maintenance personnel at all times.

The Enrollee shall allow the State or Regional Water Boards or their authorized representative, upon presentation of credentials and other documents as may be required by law, to:

- a) Enter upon the Enrollee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order;
- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
- c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
- d) Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order or as otherwise authorized by the California Water Code, any substances or parameters at any location.

This Order is not transferable to any person or party, except after notice to the Executive Director. The Enrollee shall submit this notice in writing at least 30 days in advance of any proposed transfer. The notice must include a written agreement between the existing and new Enrollee containing a specific date for the transfer of this Order's responsibility and coverage between the existing Enrollee and the new Enrollee. This agreement shall include an

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acknowledgement that the existing Enrollee is liable for violations up to the transfer date and that the new Enrollee is liable from the transfer date forward.

### **13.2.1 Compliance Summary**

As required, a copy of the Order is maintained at the District's administrative offices and <<Name of additional locations>> where it is available to the sanitary sewer O&M and other personnel at all times. A copy of the Order is included as an appendix to the District's Sewer System Management Plan (SSMP). The <<Agency Name>> is prepared to comply with the above listed requirements and to provide required access and documents to authorized personnel upon request.

### **13.2.2 Compliance Documents**

The primary document for compliance with this section is the SSMP. <<List the documents and their locations for compliance with this section>>.

- <<SSMP with location>>
- <<Spill reports and their location>>
- <<Maintenance reports and their location>>

### **13.2.3 Roles and Responsibilities**

<<Include a listing of the names/positions of all persons responsible for the maintenance of the SSMP and what those responsibilities are.>>

### **Compliance Analysis**

*Where is the WDR/SSMP to be located? Name of all locations.*

*Who will be updating and maintaining the WDR/SSMP? What are their positions and responsibilities relative to the SSMP?*

*Does the agency have a process for responding to information requested by the regulators? If so, what is that process?*

*Does the agency have a protocol for inspections from regulators? If so, what is that protocol?*

### **Recommendation:**

Complete the Compliance Summary with a brief description of how the District intends to maintain the SSMP including any protocols the District will utilize should an inspection or request for information be initiated by the State or Regional Water Board. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief

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description of related responsibilities for District staff responsible records maintenance and their accessibility.

***Key Points***

The SSMP, aside from being a requirement of GWDR, is the plan of how the agency conducts its overall operation and maintenance of its sewer collection system. The SSMP programs that have been implemented by the agency need to be available to the agency's staff for their utilization. The State or Regional Water Board has the authority to request, review, and inspect the agency's SSMP, regulated facilities, or activities including reports, documents, equipment, and practices or operations regulated or required by the Order. Unless currently in existence, the agency should establish protocols on how it will respond to inspections or requests for information from the State or Regional Water Board.

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## CHAPTER 14 – SEWER OVERFLOW REPORTING REQUIREMENTS

### 14.1 Reporting Requirements

The District shall furnish to the State or Regional Water Board, within a reasonable time, any information that the State or Regional Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The District shall also furnish to the Executive Director of the State Water Board or Executive Officer of the applicable Regional Water Board, upon request, copies of records required to be kept by this Order.

The District shall comply with the attached Monitoring and Reporting Program No. 2006-0003 and future revisions thereto, as specified by the Executive Director. Monitoring results shall be reported at the intervals specified in Monitoring and Reporting Program No. 2006-0003. Unless superseded by a specific enforcement Order for the District, these reporting requirements are intended to replace other mandatory routine written reports associated with SSOs.

The District (has) must obtain SSO Database accounts and receive(d) a “Username” and “Password” by registering through the California Integrated Water Quality System (CIWQS). These (This) account(s) will allow controlled and secure entry into the SSO Database. Additionally, within 30days of receiving an account and prior to recording spills into the SSO Database, all Enrollees must complete the “Collection System Questionnaire”, which collects pertinent information regarding a Enrollee’s collection system. The District understands that the “Collection System Questionnaire” must be updated at least every 12 months.

Pursuant to Health and Safety Code section 5411.5, any person who, without regard to intent or negligence, causes or permits any untreated wastewater or other waste to be discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State, as soon as that person has knowledge of the discharge, shall immediately notify the local health officer of the discharge. Discharges of untreated or partially treated wastewater to storm drains and drainage channels, whether man-made or natural or concrete-lined, shall be reported as required above.

Any SSO greater than 1,000 gallons discharged in or on any waters of the State, or discharged in or deposited where it is, or probably will be, discharged in or on any surface waters of the State shall also be reported to the Office of Emergency Services pursuant to California Water Code section 13271.

If the District becomes aware that it failed to submit any relevant facts in any report required under this Order, the District shall promptly submit such facts or information by formally amending the report in the Online SSO Database.

All applications, reports, or information shall be signed and certified as follows:

- (i) All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive

officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.)

- (ii) An individual is a duly authorized representative only if:
- a) The authorization is made in writing by a person described in paragraph (i) of this provision; and
  - b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

#### **14.1.1 Compliance Summary**

*<<Describe how the agency has complied with the reporting requirements of the Order. This is the general reporting to the state for compliance to the WDR. SSO reporting is in Section G and in the MRP.>>*

#### **14.1.2 Compliance Documents**

The following documents represent compliance with our reporting requirements:

- *<<SSMP Development Plan and Schedule >>*
- *<<Training records for staff having attended CWEA SSMP training>>*
- *<<SSO Reporting Guidelines>>*
- *<<WDR Awareness Training materials>>*

#### **14.1.3 Roles and Responsibilities**

The positions, roles, and responsibilities of the audit staff are as follows:

*<<Include a listing of the names/positions of all persons responsible for the reporting requirements of the SSMP and what those responsibilities are.>>*

### **Compliance Analysis**

#### **Recommendation:**

Complete the Compliance Summary with a brief description of how the District has complied with the states requirements for enrolling and completing and updating the Collection System Questionnaire. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief description of related responsibilities for District staff responsible registering and completing and updating the Collection System Questionnaire.

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### **Key Points**

The MRP requires all public spills to be reported via the California Integrated Water Quality System (CIWQS) electronic spill reporting system. Private property spills may be reported at the discretion of the agency. The SWRCB will issue each agency that completed its NOI a user name and password approximately 30 days prior to that agency's deadline for beginning its online spill reporting. Once the agency has received its user name and password they should complete the Collection System Questionnaire at the CIWQS site. This questionnaire must be updated annually and must be completed before any online spill reporting, including the monthly no spill report, can occur. The agency must also designate any additional Legally Responsible Officials (LRO) for spill certification and data submitters (for filling out spill reports) the agency intends to utilize.

### **14.2 Sanitary Sewer Overflow Reporting**

Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited as is any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is prohibited. SSOs are divided into categories and are to be reported, based upon their category to the SWRCB's statewide database via the Internet.

Category 1 - All discharges of sewage resulting from a failure in the Enrollee's sanitary sewer system that:

- A. Equal or exceed 1000 gallons, or
- B. Result in a discharge to a drainage channel and/or surface water; or
- C. Discharge to a storm drainpipe that was not fully captured and returned to the sanitary sewer system.

Category 1 SSOs – All SSOs that meet the above criteria for Category 1 SSOs must be reported as soon as: (1) the District has knowledge of the discharge, (2) reporting is possible, and (3) reporting can be provided without substantially impeding cleanup or other emergency measures. Initial reporting of Category 1 SSOs must be reported to the Online SSO System as soon as possible but no later than 3 business days after the District is made aware of the SSO. Minimum information that must be contained in the 3-day report must include all information identified in section 9, except for item 9.K, of the Monitoring and Reporting Program. A final certified report must be completed through the Online SSO System, within 15 calendar days of the conclusion of SSO response and remediation. Additional information may be added to the certified report, in the form of an attachment, at any time.

The above reporting requirements do not preclude other emergency notification requirements and timeframes mandated by other regulatory agencies (local County Health Officers, local Director of Environmental Health, Regional Water Boards, or Office of Emergency Services (OES)) or State law.

Category 2 – All other discharges of sewage resulting from a failure in the Enrollee's sanitary sewer system.

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Category 2 SSOs – All SSOs that meet the above criteria for Category 2 SSOs must be reported to the Online SSO Database within 30 days after the end of the calendar month in which the SSO occurs (e.g. all SSOs occurring in the month of January must be entered into the database by March 1st).

Private Lateral Sewage Discharges – Sewage discharges that are caused by blockages or other problems within a privately owned lateral.

Private Lateral Sewage Discharges – All sewage discharges that meet the above criteria for Private Lateral sewage discharges may be reported to the Online SSO Database based upon the District’s discretion. If a Private Lateral sewage discharge is recorded in the SSO Database, the District must identify the sewage discharge as occurring and caused by a private lateral, and a responsible party (other than the District) should be identified, if known.

If there are no SSOs during the calendar month, the District will provide, within 30 days after the end of each calendar month, a statement through the Online SSO Database certifying that there were no SSOs for the designated month.

In the event that the SSO Online Database is not available, the District must fax all required information to the appropriate Regional Water Board office in accordance with the time schedules identified above. In such event, the District must also enter all required information into the Online SSO Database as soon as practical.

#### **14.2.1 Compliance Summary**

*The District has registered and filed its Notice of Intent (NOI) with the SWRCB and has developed a reporting plan consistent with the above reporting requirements. District staff has completed SSO Reporting Training conducted by CWEA and has filed its annual questionnaire.*

If the District becomes aware that the District has failed to submit to the SWRCB any relevant facts in any report required under this Order, the District shall promptly amend the report and submit such facts or information.

#### **14.2.2 Compliance Documents**

The following documents support our reporting compliance:

- <<SSO Reporting Guidelines>>
- <<SSO Emergency Response Plan>>
- <<Other documentation>>

#### **14.2.3 Roles and Responsibilities**

The following staffed positions provide SSO reporting:

<<Insert list of positions responsible for SSO reporting including the person responsible for certifying SSO reports>>

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### **Compliance Analysis**

*Have agency personnel attended the CWEA training for the use of the SSO reporting database?*

*Do agency personnel understand the reporting categories and are SSO reports being generated?*

### **Recommendation:**

Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief related description of responsibilities for District staff responsible for SSO reporting.

### **Key Points**

CWEA has provided training specifically designed to familiarize collection system agencies with the electronic spill reporting required by the MRP. This training is offered regionally throughout the state based upon when individual regions are required to start electronic spill reporting. Agencies are encouraged to attend these training classes. Additionally, CWEA has produced a training manual in conjunction with the training as a resource.

### **14.3 Monitoring and Records Keeping**

If water quality samples are required by an environmental or health regulatory agency (Ventura County Environmental Health Department) or State law, or if voluntary monitoring is conducted by the District or its agent(s), as a result of any SSO, records of monitoring information shall include:

- a) The date, exact place, and time of sampling or measurements;
- b) The individual(s) who performed the sampling or measurements;
- c) The date(s) analyses were performed;
- d) The individual(s) who performed the analyses;
- e) The analytical technique or method used; and,
- f) The results of such analyses.

All monitoring instruments and devices that are used by the <<Agency Name>> to fulfill the prescribed monitoring and reporting program shall be properly maintained and calibrated as necessary to ensure their continued accuracy. Individual SSO records shall be maintained by the District for a minimum of five years from the date of the SSO. This period may be extended when requested by a Regional Water Board Executive Officer. All records shall be made available for review upon State or Regional Water Board staff's request. The District shall retain records of all SSOs, such as, but not limited to and when applicable:

- a) Record of Certified report, as submitted to the online SSO database;
  - b) All original recordings for continuous monitoring instrumentation;
  - c) Service call records and complaint logs of calls received by the Enrollee;
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- d) SSO calls;
- e) SSO records;
- f) Steps that have been and will be taken to prevent the SSO from recurring and a schedule to implement those steps.
- g) Work orders, work completed, and any other maintenance records from the previous 5 years which are associated with responses and investigations of system problems related to SSOs;
- h) A list and description of complaints from customers or others from the previous 5 years; and
- i) Documentation of performance and implementation measures for the previous 5 years.

### **14.3.1 Compliance Summary**

*<<Insert statement describing how the agency handles requests for monitoring and how SSO, monitoring and other related records are retained.>>*

### **14.3.2 Compliance Documents**

The compliance documents include the following:

- *<<SSO Reporting Guidelines>>*
- *<<Agency's record retention policy>>*
- *<<Agency's sampling program or procedures>>*

### **14.3.3 Roles and Responsibilities**

The positions, roles, and responsibilities for SSO monitoring and records keeping and retention are as follows:

*<<Insert list of positions responsible for SSO monitoring and records keeping>>*

### **Compliance Analysis**

*If sampling is required, does the agency maintain appropriate sample kits and have employees been trained in proper sampling techniques?*

*Does the agency have a written procedure for sampling?*

*If the agency does not do its own sampling, does the agency have a contact that can provide that function? If so, who is it and what is the procedure?*

*Does the agency have a records retention policy?*

*How does the agency maintain records of SSOs?*

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**Recommendation:**

Complete the Compliance Summary with a brief description of how the District keeps records of any required monitoring. Complete Compliance Documents with a listing of appropriate supporting documents and their location. Complete Roles and Responsibilities listing the titles and a brief related description of responsibilities for District staff responsible for required record keeping.

**Key Points**

Regulators may require sampling after an SSO. If the agency possesses the required sampling equipment and have trained personnel sampling may be done by the agency, otherwise sampling should be conducted by a qualified lab. Sampling and other spill related records must be maintained and made available to the State or Regional Water Board upon request based upon the requirements of the Order. This also applies to any voluntary monitoring the agency conducts as a result of an SSO.

**14.4 Other Information**

<<Insert additional information such as special requirements imposed by the RWQCB for this agency>>

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## SSMP Task Development Schedule

Main Task/Sub-Task	Comments	Start Date	Budget	Status/Due Date	Responsible Party
<b>Application for coverage</b>	Submit Notice of Intent (NOI) to the state identifying the agency's authorized representative including required permit fee.			November 2, 2006	
<b>SSO electronic reporting program</b>	District must report all SSOs to the statewide SSO database via the Internet.	January 2, 2007		January 2, 2007	
CWEA training for electronic spill reporting.	CWEA sponsored training for the CIWQS spill reporting database.	November 2006		January 2, 2007	
LRO Identification	Identify and notify state of all District Legally Responsible Official(s).				
Register Data Submitter(s)	Register all staff data submitters for SSO reporting with the state (continual).			Continual	
Completion of Collection System Questionnaire.	Questionnaire must be completed before spill reporting can be conducted.			January 2, 2007	
<b>SSMP Development Plan and Schedule</b>	Initial plan on how the agency intends of developing and implementing their SSMP.				
Board approval of Development Plan and Schedule.	Present SSMP Development plan to the Board of Directors for approval.				
<b>Goal and Organizational Structure</b>					
SSMP Goals	Stated goals for the SSMP				
Agency Organizational Structure	Names and staff positions responsible for developing and implementing the SSMP.				
Organizational Chart for	Develop organization chart of				

SSMP Development and Implementation	management, admin, and maintenance personnel.				
SSO Chain of Communications	Develop the internal chain of communications for reporting SSOs.				
<b>Overflow Emergency Response Plan</b>	Written procedures defining how the agency responds to SSOs.				
Overflow Response Procedures	Develop standard operating procedures for SSO response.				
Notification Procedures	Develop notification procedures to ensure all required regulators (and others) are properly and timely notified of an SSO event.				
Emergency Response Training	Develop and implement Emergency Response Training Program for staff or contractors if utilized.				
Traffic and Crowd Control	Develop procedures for traffic and crowd control to be utilized during an SSO event.				
Monitoring and Sampling	Develop procedures for monitoring and sampling, if required, for an SSO event.				
Follow-up	Develop procedures for following up an SSO event including investigation for cause.				
<b>Legal Authority</b>	Agency's legal authority to operate and maintain its sewage collection system.				
Ordinance Development for Preventing Illicit Discharges	Develop/amend required ordinance to comply with Order.				
Ordinance Legal Review	Ordinances developed, amended, reviewed by District's legal counsel				
Ordinance Adoption	Adoption of required ordinances by the District's governing body.				
Ordinance Development Requiring Proper Design and Construction	Develop/amend required ordinance to comply with Order.				

Ordinance Legal Review	Ordinances developed, amended, reviewed by District's legal counsel				
Ordinance Adoption	Adoption of required ordinances by the District's governing body.				
Ordinance Development to Provide Adequate Access to the System	Develop/amend required ordinance to comply with Order.				
Ordinance Legal Review	Ordinances developed, amended, reviewed by District's legal counsel				
Ordinance Adoption	Adoption of required ordinances by the District's governing body.				
Ordinance Development for the Limiting of the Discharge of Fats, Oils and Grease	Develop/amend required ordinance to comply with Order.				
Ordinance Legal Review	Ordinances developed, amended, reviewed by District's legal counsel				
Ordinance Adoption	Adoption of required ordinances by the District's governing body.				
Ordinance Development to Enforce Violations	Develop/amend required ordinance to comply with Order.				
Ordinance Legal Review	Ordinances developed, amended, reviewed by District's legal counsel				
Ordinance Adoption	Adoption of required ordinances by the District's governing body.				
<b>Operation and Maintenance</b>					
Mapping	Up to date mapping of the sewage collection system facilities including appropriate stormwater systems.				
Mapping Updates	Develop procedures for maintaining mapping data.				
Preventive maintenance program	Develop a written description of the preventative maintenance activities the agency employs.				
Pipeline Maintenance	Develop schedule for line cleaning and maintenance.				
Pumping and Other Facilities	Develop schedule for maintenance of pumping and other facilities				

Problem Areas	Identify problem areas and develop procedures for their maintenance.				
Rehabilitation and replacement program	Develop a short and long term plan for the rehabilitation or replacement due to system deficiencies including funding (CIP).				
Inspection program	Develop a program for the regular visual and CCTV inspection of the system.				
Inspection Schedule	Develop a schedule for the ongoing inspection of the entire system.				
Work Orders	Develop system to track and schedule all maintenance activities.				
Staff training	Develop staff O&M training and assurance that contractors are adequately trained.				
Equipment and parts inventory	Develop an inventory of equipment and parts.				
Critical Parts	Develop an inventory of critical replacement parts including procedures for acquisition.				
<b>Grease Control Program</b>					
Determination of FOG Problems	Evaluate system to determine if FOG related problems exist.				
FOG Characterization Study	If FOG problems are present perform a FOG Characterization Study to determine the location and extent of problems.				
FOG ordinance	Legal authority to prevent the discharge of FOG into the system.				
FOG program	Program to reduce or eliminate FOG related SSOs.				
Develop FOG Source Control Program	Establish an appropriate FOG source control program.				
Public Outreach	Develop an appropriate public education and outreach program.				
FOG Disposal	Develop a list of authorized FOG disposal sites.				

FOG Inspections	Develop and implement a FOG inspection program.				
<b>Design and Performance</b>					
Design standards	Develop design standards for new and rehabilitated systems including procedures to ensure capacity in existing system due to new or remodel construction.				
Inspection and testing standards	Develop inspection and testing standards for new and rehabilitated systems including acceptance testing procedures.				
<b>System Evaluation and Capacity Assurance Plan</b>	Evaluate those portions of the system that are experiencing capacity related overflow. Establish steps to eliminate capacity related overflows including I&I program, and short and long term CIP for capacity issues				
Inflow and Infiltration	Develop procedures to detect and remediate I&I problems.				
Hydraulic Model	Develop hydraulic model of the system.				
Identify Deficiencies	Identify areas of the system that exhibit capacity deficiencies.				
Analyze Defects	Analyze and prioritize pipeline defects.				
Capital Improvement Projects	Develop a prioritized CIP for with a schedule of completion dates.				
<b>Monitoring, Measurements and Plan Modifications</b>	The ongoing evaluation of the performance of the SSMP and its ability to achieve its stated goals.				
Data Management	Develop procedures for accumulating and analyzing system maintenance and other pertinent data.				
Program Effectiveness	Develop procedures, reports, etc. to measure the effectiveness of the				

	SSMP				
Program Changes	Develop procedures to initiate changes, enhancements, or correct deficiencies in the SSMP.				
<b>SSMP Program Audits</b>	Program audits are required every two years and document the success of the SSMP and improvements made to it. The first audit is due 2 years after adoption date of final SSMP				
Document Control	Develop procedures for SSMP document control.				
Key Individual(s)	Identify key individual(s) responsible for the SSMP audit (every 2 years).				
Checklist	Develop a checklist to assist to ensure the SSMP is compliant and effective.				
Reports	Develop reports to assist with analyzing the effectiveness of the SSMP.				
Milestones	Develop milestones (time, events, etc.) that denote program review.				
<b>Communications Program</b>	The communications program is the agency's outreach to the community and satellite contributors to the public collection system.				
Satellite(s)	Develop a list of satellites contributing to the system.				
Satellite Protocol	Develop a communications protocol satellites contributing to the system.				
Public Outreach	Develop protocol for soliciting and responding to public input.				
Staff SSMP Awareness	Develop program to ensure staff awareness of SSMP.				
<b>Final SSMP</b>	Final SSMP document after all elements have been developed and				

	implemented.				
Review by counsel	Review of completed SSMP by the District's legal counsel.				
Approval/certification of SSMP by District's Governing Board	Approval/certification of final SSMP document by District's governing body.				
<b>Recertification of SSMP</b>	The SSMP must be re-approved by the Board and recertified to the State every five years.				

Notes:<<Add any notes that pertain to the schedule or its implementation>>

DRAFT