



**San Miguel Community Services District  
Sewer System Management Plan, Revision 0 – September 24, 2010  
Audit Report**

May 24, 2018

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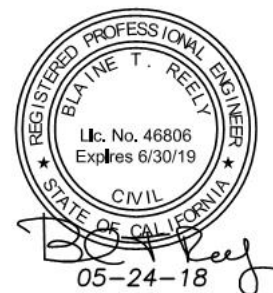
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Prepared By:



**MONSOON CONSULTANTS**

CIVIL ENGINEERING / HYDROLOGY



## **CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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Rob Roberson

Interim General Manager

San Miguel Community Services District

## **SCOPE AND PURPOSE**

The State Water Resources Control Board (SWRCB) Sanitary Sewer System Waste Discharge Requirements Order No. 2006-0003-DWQ as amended by WQ 2013-0058-EXEC (SSSWDR Orders) require the San Miguel Community Services District (District) to conduct Sewer System Management Plan (SSMP) Audits a minimum of every two years or more frequently if warranted. The District was required to conduct an audit by July 31, 2016 and file the audit report with the most current revision of the SSMP.

The District's SSMP Audit Report is required to evaluate the effectiveness of and compliance with the District's current revision of the SSMP.

The SSMP Audit Report measures compliance with section D.13 of the SSSWDR Orders and the effectiveness of the District's implementation of the current certified SSMP; Revision 0 dated September 24, 2010:

1. [SSSWDR, Sect. D.13.i]: Agency Goals
2. [SSSWDR, Sect. D.13.ii]: Agency Organization
3. [SSSWDR, Sect. D.13.iii]: Legal Authority
4. [SSSWDR, Sect. D.13.iv]: Operations and Maintenance
  - a. Sanitary System Maps
  - b. Rehabilitation and Replacement Plan
  - c. Routine Preventative Operation and Maintenance Activities
  - d. Contingency Equipment and Replacement Inventories
  - e. Employee Training
5. [SSSWDR, Sect. D.13.v]: Design and Performance Provisions
6. [SSSWDR, Sect. D.13.vi]: Overflow Emergency Response Plan
7. [SSSWDR, Sect. D.13.vii]: Fats, Oils, and Grease Control Program
8. [SSSWDR, Sect. D.13.viii]: Capacity Management
9. [SSSWDR, Sect. D.13.ix]: Monitoring, Measurement, and Program Modifications
10. [SSSWDR, Sect. D.13.x]: Sewer System Management Plan Audit
11. [SSSWDR, Sect. D.13.xi]: Communication Program

## AUDIT FORMAT

This SSMP Audit separately evaluates each SSMP Section using the following format:

- Applicable SSSWDR Section
- Audit Finding
- Ranking
- Reference Information
- Deficiencies
- Recommended steps and schedule to correct Deficiencies

The ranking criteria utilized in the Audit are provided in Table 1 below:

**Table 1: SSMP Audit Ranking Criteria**

<b>Ranking</b>	<b>Ranking Basis</b>
In Compliance	All requirements specified in the section are met.
Substantial Compliance	The majority of requirements in the section are met.
Partial Compliance	Half of the requirements in the section are met
Marginal Compliance	Less than half of the requirements in the section are met.
Out of Compliance	None of the requirements in the section are met.

## SSMP AUDIT PARTICIPANTS AND SCHEDULE

The SSMP Audit Report assesses the effectiveness of District's SSMP Revision 0, dated September 23, 2010, and compliance with the SSSWDR Section D.13 requirements. The Audit is required to identify deficiencies, if any, in the SSMP and identify steps to correct them. The Audit was conducted by:

- Blaine T. Reely, PhD, PE  
*District Engineer for the San Miguel Community Services District (contracted to Monsoon Consultants)*

District staff interviewed for the audit were:

- Kelly Dodds  
*Director of Utilities*

## 2018 San Miguel CSD Audit Meetings

SSMP Audit Date	Location	Attendees
May 10, 2018	San Miguel CSD Office	Kelly Dodds and Blaine Reely

## AUDIT DEFICIENCIES

The SSMP Audit results in a finding that the San Miguel CSD SSMP dated September 24, 2010 is in compliance with two out of eleven subsections (elements) of SSSWDR Section D.13 and has been mostly ineffective in implementation of the SSMP. The District was found to be in substantial compliance with one element, partial compliance with four elements, in marginal compliance with one element, and out of compliance with 3 elements of SSSWDR Section D.13. A summary of these findings is presented in the table below:

SSSWDR Section D.13	SSMP Compliance with Required Subsection	District Effectiveness in Implementation of SSMP Subsections	Schedule
<b>1. Agency Goals</b> [SSSWDR D.13(i)]	<b>In Compliance</b>	The goals provided were not all measurable due to the lack of records pertaining to the goals stated. District was ineffective in the implementation of this section.	District Goals were reviewed and updated as appropriate in the 2018 Plan Update
<b>2. Organization</b> [SSSWDR D.13(ii)]	<b>Substantial Compliance</b>	The District is required to keep the chain of communication for reporting SSOs current and is required to update the State Water Resources Control Board when persons having the legal responsibility leave the District and new authorized legal representatives are hired. The District has updated relevant information in conjunction with the 2018 Plan Update.	Review and update key personnel and agency contact information as appropriate in 2018 Plan Update
<b>3. Legal Authority</b> [SSSWDR D.13(iii)]	<b>Substantial Compliance</b>	The District Sewer User Ordinance, dated June 1973, requires revision to obtain all of the legal authorities required by the section D.13(iii).	Revise the 1973 Sewer Use Ordinance by the end of December 2018 and then update this section of the SSMP to reflect the changes.

<p><b>4. Operation and Maintenance Program [SSSWDR D.13(iv)]</b></p>	<p><b>Substantial Compliance</b></p>	<p>The District should provide and document training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained. In addition, the District should develop and maintain a list of equipment and replacement part inventories, including identification of critical replacement parts and qualified service providers.</p>	<p>Develop and implement a formal training program for wastewater staff by December 31, 2018.</p>
<p><b>5. Design and Performance Provisions [SSSWDR D.13(v)]</b></p>	<p><b>In Compliance</b></p>	<p>This section is required to be updated to reflect that the District uses the most current San Luis Obispo County Public Works Standards and/or other recognized standards such as the Public Works Green Book for design, installation, repair, and inspection of all sewer systems.</p>	<p>Update this subsection by the end of December 2018.</p>
<p><b>6. Overflow Emergency Response Plan [SSSWDR D.13(vi)]</b></p>	<p><b>Marginal Compliance</b></p>	<p>This section should be revised to include updates required in the Revised 2013 SSWDR Monitoring and Reporting Program. The effectiveness of implementation of the existing OERP was not able to be measured as the District has not experience an SSO since District formation in 2000.</p>	<p>Prepare an updated OERP which includes a Monitoring and Reporting Program (MRP) consistent with the 2013 MRP, and associated emergency response procedures, forms, and training program by the end of December 2018.</p>
<p><b>7. Fats, Oils and Grease (FOG) Control Program [SSSWDR D.13(vii)]</b></p>	<p><b>In Compliance</b></p>	<p>The District has not experienced a FOG related SSO since its formation in 2000 to the date of this Audit. The District SSMP does state that the need for a FOG Program will be evaluated annually.</p>	<p>Evaluate the need for a FOG Program by the end of December 2018 and proceed as appropriate based on findings. Update SSMP to reflect findings.</p>

<p><b>8. System Evaluation and Capacity Assurance Plan [SSSWDR D.13(viii)]</b></p>	<p><b>In Compliance</b></p>	<p>The 2005 San Miguel CSD Wastewater Master Plan was included in the SSMP as evidence of the SECAP. Prior audits identified a lack of information with regard to wastewater CIP project definitions and completion schedules in that document and the SSMP. The District has addressed these issues in the updated Wastewater Masterplan which was adopted by the District in November 2017</p>	<p>Include information from the Updated 2017 Wastewater Master Plan and include this updated information in this section of the 2018 SSMP Update by the end of December 2018.</p>
<p><b>9. Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]</b></p>	<p><b>Out of Compliance</b></p>	<p>The General Manager, Director of Utilities, District Engineer and other applicable utilities staff should meet quarterly to review progress towards creation of and implementation of the required sections of the District's SSMP until such time that an acceptable program for Monitoring, Measurement, and Program Modification is prepared.</p>	<p>Document quarterly meetings with an agenda and meeting record.</p>
<p><b>10. SSMP Program Audits [SSSWDR D.13(x)]</b></p>	<p><b>Marginal Compliance</b></p>	<p>The SSMP Audit Report was generated to ensure that the requirement to audit the effectiveness of and compliance with SSMP was met. The audit was conducted in May 2018 which is approximately two (2) years later than was required (i.e. August 2, 2016).</p>	<p>Complete the next Audit prior to May 24, 2020. SSMP 5 Year Update is due May 24, 2023.)</p>
<p><b>11. Communication Program [SSSWDR D.13(xi)]</b></p>	<p><b>Marginal Compliance</b></p>	<p>Update this section of the SSMP in 2018. Post the SSMP and this audit on the District website as it committed to in the SSMP.</p>	<p>. Post the SSMP and this audit on the District website by the end of December 2018.</p>

The following sections of this report describe these deficiencies in detail and address future additions and updates the District is required to make to its SSMP. The above revision list is a summary and is not intended to replace the detailed Deficiencies and Recommendations identified in the SSMP Audit Report. The entire SSMP Audit Report recommendations are

required to be implemented in a reasonable time frame to ensure compliance with the SSS Orders.

Agency SSMPs are required to be updated every five (5) years (from the date of required adoption), and must include any significant program changes. Re-certification by the governing board of the enrollee (agency) is required in accordance with SSSWDR Section D.14 when significant updates are made.



## Goal [SSSWDR D.13(i)]

The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the Sanitary Sewer System. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

*Section D.13(i):* The September 24, 2010 San Miguel CSD SSMP states that the District goals for maintaining and implementing the SSMP are to:

- 1 Continue with the proactive approach to minimize the likelihood of a SSO (current practices in place have prevented an SSO incident since the District was formed in 2000). Should an SSO occur, the goal of the District is to perform a comprehensive analysis determining if any changes to the process/management of the collection system are warranted.
- 2 Prevent public health hazards through proper notification, emergency response and spill containment and clean up procedures.
- 3 Minimize inconveniences by responsibly and quickly handling interruptions in service.
- 4 Protect large investments in collection system by maintaining adequate capacities and extending useful life.
- 5 Use available funds for sewer operations in the most efficient manner. Identify, prioritize, and continuously upgrade and replace sewer system facilities to maintain reliability and adequacy of service to customers.
- 6 Convey wastewater to the treatment facility with a minimum of infiltration and inflow.
- 7 Provide adequate capacity to convey peak flows.
- 8 Remain proactive in capacity assurance through continual system evaluations so that the District can ensure proper wastewater collection to accommodate future growth.
- 9 Perform all operations in a safe manner to avoid personal injury and/or property damage.
- 10 Be available and responsive to the needs of the public, and work cooperatively with local, state and federal agencies to reduce, mitigate and properly report SSO.
- 11 Implement regular, practical maintenance of the sewer collection system to remove roots, debris, sand, and FOG in areas prone to blockages that may cause SSO or sewer backups.
- 12 Provide high quality and cost-effective wastewater collection for customers served by meeting these goals.

The District has not experienced an SSO since records were required to be kept in 2006.

**Sufficiency:** In Compliance

**Reference:** September 24, 2010 San Miguel SSMP, Page 9 and 10.

**Deficiencies:** None Noted.

**Recommendation:** None Noted.

## **Organization [SSSWDR D.13(ii)]**

The SSMP must identify:

- a) The name of the responsible or authorized representative as described in Section J of the SSSWDR;
- 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;
- c) The chain of communication for reporting Sanitary Sewer Overflows (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 California Emergency Management Agency).

*Section D.13(ii)(a):* The name of the legally authorized representatives is identified in Figure 2-1; District Organization Chart; as the Utilities Supervisor, Kelly Dodds. (Mr. Dodds job title has been updated in the 2018 SSMP to be Director of Utilities) The State Water Resources Control Board requires formal written notification of persons who are currently or no longer employed with the District so the California Integrated Water Quality Information System (CIWQS) database can be updated. The District has updated CIWQS with current contact information.

*Section D.13(ii)(b):* Names and contact information are located in Appendix B of the SSMP. The names of the Board of Directors and staff titles in Appendix B have been updated in the 2018 SSMP. Current contact information has also been updated for District staff and potentially affected agencies.

*Section D.13(ii)(c):* A chain of communicating SSOs from receipt of complaint or other information to persons responsible for notifications, gathering and documentation of required information by the taking of photos and filling out forms, and final required reporting in the State's database (CIWQS) is included in the SSMP. The names and phone numbers of the regulatory agencies to be notified have been updated in the 2018 SSMP.

**Sufficiency:** Substantial Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP and May 24, 2018 SSMP Update. .

**Deficiencies:** The Organization element partially meets the requirements of the SSSWDR as specified above. Chain of Communication for Reporting SSOs (Figure 2-2) has been updated in the 2018 SSMP Update in accordance with the requirements 2013 Monitoring and Reporting Requirements.

**Recommendation:** Review and update this element of the SSMP and review update with District staff on an annual basis.

## **Legal Authority [SSSWDR D.13(iii)]**

This element requires the following:

Each Enrollee must demonstrate, through sanitary system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- a) Prevent illicit discharges into its sanitary sewer system (examples include Inflow/Infiltration (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 (FOG) in and other debris that may cause blockages; and
- e) Enforce any violations of its sewer ordinances.

The following District ordinances were referenced, but not included in the SSMP; Ordinance 1 dated June 1973, 2000-49, 2001-10, 02-01, and 02-05. All referenced ordinances and resolutions must be included in SSMP Appendices or a link for accessing the ordinances electronically must be given.

*Section D.13(iii)(a):* Illicit discharges are addressed by Ordinance 1, June 1973 in Article 3, Section 3.1 which is entitled Prohibitions and as follows:

- Illicit connections which cause I/I are indirectly prohibited under Section 3.1.(f);
- Discharge of stormwater, surface water, roof runoff, and subsurface drainage, is prohibited under Section 3.1(f);
- Discharge of waters or wastes with chemical attributes (pH lower than 5.5 and greater than 9.5, are toxic, explosive, have a temperature that exceeds 150 F, etc) and/or physical characteristics (sand, earth, cement, glass wood, rags etc.) harmful to the system are prohibited under Section 3.1(a) – (o);
- Discharge of oil, grease or petroleum greater one hundred parts per million concentration is prohibited under Section 3.1(b) and debris that cause blockages under Section 3.1(d); and
- Discharge of solid substances, such as garbage (e.g. cut roots), with the ability to cause blockages is prohibited under Section 3.1(j).

This section is in compliance with the requirement above.

*Section D.13(iii)(b):* The District SSMP states on page twenty, that sewers and connections are required to be designed and constructed in accordance with the 2008 version of the San Luis Obispo County Department of Public Works Standard Improvement Specifications and Drawings. However, 2008 SLO County Department of Public Works Standard Improvement Specifications and Drawings are not referenced in any of the District Ordinances above with regard to sewer connection design and construction which gives the District the legal authority to require these standards. Additionally, the SLO County Design Standards were updated in 2011. This reference to the 2011 SLO County Department of Public Works Standard Improvement Specifications and Drawings was updated in the 2018 Plan Update

This section is in substantial compliance with the requirement.

Additionally on page twenty, the District SSMP references Ordinance 1, June 1973, Article 4, Sewer Connections Required, and Section 4.4 which states, “Connections shall be made of materials and in a manner approved by the General Manager, who shall inspect all connections.” This section of the ordinance should be specific and identify the District standards used to approve the design and construction of connections. It is recommended at the Ordinance be updated to reference the general design standards used by the District.

*Section D.13(iii)(c):* The District SSMP, on page twenty, references Ordinance 1, June 1973, Article 13, Right of Inspection, Section 13.1 (1973 Ordinance) which states, “The officers, employees, and inspectors of the District have the right to enter upon the premises of any person at reasonable hours to inspect and to determine whether this ordinance is being violated.” The District does not own or maintain any portion of the systems sewer laterals and therefore does not need the legal authority to access them as found in; Ord. 1 Article: 6 Sewer Extensions, Part 6.6.

*Section D.13(iii)(d):* The District SSMP, on page twenty, references Ordinance 02-01 Section 3 which requires the installation of grease trapping devices. The requirement is met by Ordinance 1, June 1973 in Article 3, Section 3.1(b) which does prohibit the discharge of oil, grease or petroleum greater one hundred parts per million concentration. The SSMP requires updating to add that the 1973 Ordinance prohibits the discharge of oil, grease, or petroleum.

*Section D.13(iii)(e):* The section of Ordinance 1, June 1973, Article 14, and entitled Penalties adequately addresses the requirement to enforce violations of the ordinances. The sections of California Health and Safety Code referenced (6523.01 or 6523.3) are accurate. The District SSMP, on page twenty references a Sewer Code. For clarity, this reference should be made to District Sanitary Sewer and Ordinances.

**Sufficiency:** Substantial Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 19 – 20. San Miguel Ordinance 1, June 1973, 2000-49, 2001-10, 02-01, and 02-05.

**Deficiencies:** The Legal Authority element substantially meets the requirements of the SSSWDR as specified above.

**Recommendation:** The Sewer Use Ordinance must be revised to obtain the above described legal authorities required in the WDRs, and should also be revised to reference the appropriate design standards to be used by the District. The schedule for completion of these tasks should be by the end of December 2018.

## **Operations and Maintenance Program [SSSWDR D.13(iv)]**

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 and 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 to 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.

*Section D.13(iv)(a):* The District SSMP, on page twenty-one and twenty-two describe the thirteen maps which were compiled into a Sewer Atlas and created by the District and Wallace Group on June 14, 2004. These maps were subsequently updated in 2015 by the Wallace Group, utilizing GIS technology, to correct discrepancies, modifications to the system, and to account for new development. The District Engineer has the responsibility to periodically update the Sewer Atlas as required to reflect expansions and changes to the sanitary sewer system.

The SSMP states on page twenty-two that "The system atlas maps highlight any High Maintenance Areas (HMA)." High Maintenance Areas are not currently shown on the maps prov. The documentation of HMAs on a District map is not a specific requirement identified in the WDRs however these areas are required to be identified in some format if they exist. It is understood that the District has directed the District Engineer to identify the HMAs on the Sewer Atlas maps in the future when the Sewer Atlas maps are next updated.

This subsection is in compliance with the requirement to maintain an up-to-date map of the sanitary sewer system.

*Section D.13(iv)(b):* The District SSMP, on page twenty-two, presents a schedule for the cleaning of the District’s system. The interval is required to be updated to represent annual cleaning of the entire system rather than “half of sewer lines cleaned” annually. Two High Maintenance Areas (HMAs) are identified; but the cleaning schedule for the sewer line servicing Verde Place is not given. Based on discussions with the Director of Utilities it is understood that the cleaning schedule has been revised to provide for annual cleaning of all lines in the system. The Director of Utilities also indicated that the cleaning schedule for the HMS’s is on an “as-needed” basis, but typically at least twice per year. District staff was unable to produce work orders and operator logs during the audit that are described in the SSMP; as the system used to document the activities.

System-wide CCTV inspections are referenced in the O&M section of the SSMP as occurring on “ten year intervals”. The last CCTV inspections were conducted in 2002 with the District missing the target date of 2012 for the next round of CCTV. A plan to conduct system-wide CCTV inspections is included in the 2018 Update to the Water & Wastewater Masterplan and is programmed in the CIP to be completed in conjunction with a city-wide sanitary sewer lining project on or before December 31, 2023.

*Section D.13(iv)(c):* The District SSMP, on page twenty-two, is entitled Rehabilitation and Replacement Program, and should be updated to read “Rehabilitation and Replacement Plan” per the WDR in the 2018 Plan Update. The Rehabilitation and Replacement (R&R) Plan is generally described in the District’s recommendations for Capital Improvement Projects for the wastewater system which are summarized in the Wastewater Masterplan. The masterplan was updated in November 2017. Based on conversations with the Director of Utilities, the schedule of implementation for the R&R related CIP projects in the future will be dependent on available funding, but are currently planned to be completed on or before December 31, 2023. The District Wastewater Masterplan (Updated and Adopted by District in November 2017) is available on the San Miguel Community Services Website – [www.sanmiguelcsd.org](http://www.sanmiguelcsd.org)).

*Section D.13(iv)(d):* The District SSMP states on page 23 that it does not have a formal training program. The District is therefore out of compliance with this requirement. A training program for this subsection is generally expected to include training on; SSSWDR Orders, the District’s SSMP, associated O&M procedures, and associated on the job collection system maintenance activities (*Examples: manhole inspections, response to sewer line service connection requests, routine traffic and crowd control, and customer complaint response*). Lastly, the District’s procedure or requirement for ensuring that Contractors working on the District’s collection system are trained to perform work on the collection system is required to be included in the SSMP. It is understood through discussions with the Director of Utilities that a formal training program is planned for development in 2018 and will be implemented immediately after its adoption by the District.

*Section D.13(iv)(e):* The list of equipment available to District staff is located in Appendix C of the SSMP and discussed on page 23. The list is out of date and will be revised in conjunction with the 2018 Plan update. A list of vendors and or contractors for parts and equipment not readily kept in stock should also be included in future updates to the SSMP.

**Sufficiency:** Substantial Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 19 – 20, interview on May 10, 2018 with the Director of Utilities.

**Deficiencies:** The Operation and Maintenance Program subsection substantially meets the requirements of the SSSWDR section D.13(iv) as specified above.

**Recommendation:** The District should consider implementing a O&M system which includes a system for scheduling and tracking maintenance activities, O&M procedures, work order forms and written inspection reports for sewer cleaning and manhole inspection activities. This program will then be utilized in updating and managing the Rehabilitation and Replacement Plan which shall include a schedule for completing short and long term projects, and a plan and schedule to obtain funds for identified projects. In addition, the District should implement a formal training program for all staff that work on the wastewater system and maintain a list of list of qualified vendors and or contractors for parts and equipment not readily kept in stock.

## Design and Performance Provisions [SSSWDR D.13(v)]

- a) 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
- b) Procedures and standards for inspecting and testing the installation of new sewers, pimps, and other appurtenances and for rehabilitation and repair projects.

*Section D.13(v)(a):* The District SSMP, on page twenty-four, states that the District “generally” follows the 2008 San Luis Obispo County Public Works Standards. It is understood from discussions with the Director of Utilities that in some cases where the County standards are not followed, the District staff and Engineer provide review and approval based on a determination that the proposed alternative is equal to or better than the comparable County standard.

It is recommended that this section be updated to state that the “most current version of the SLO County Public Works Standards are used.” The most current version is either to be printed out and included as an appendix to the SSMP or a working link must be provided. The current link is: <http://www.slocounty.ca.gov/PW/DevServ/PublicImprovementStandards.htm>.

*Section D.13(v)(b):* The District SSMP, on page twenty-four, states that the District Utility Supervisor inspects installations of all work in accordance with District standard procedures. In 2018, the position of Utility Supervisor was changed and the current position is the Director of Utilities. When requested by the auditor, the District Director of Utilities was not able to produce written standard procedures to be used during installation inspections, although he did indicate that the District inspection procedures for new gravity sewers, manholes and other appurtenances, etc. those set forth in the most current version of the SLO County Public Works Standards.

**Sufficiency:** In Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 24. 2008, 2011 San Luis Obispo County Public Works Standards.

**Deficiencies:** Design and Performance Provisions subsection partially meets the requirements of the SSSWDR as specified above.

**Recommendation:** Update this section of the SSMP to include reference to acceptable design and construction standards and inspection procedures (e.g. the Public Works Green Book, SLO County) acceptable to the District.



## **Overflow Emergency Response Plan [SSSWDR D.13(vi)]**

Each Enrollee shall develop and implement an overflow emergency response plan (OERP) that identifies measures to protect public health and the environment. At a minimum, the 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 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 purveyors, etc.) of all SSOs that potentially affect public health or reach the waters of the State. All SSOs shall be reported in accordance with the California Water Code, other State Laws, and other applicable RWQCB WDR or permit requirements. The SSMP identifies the officials who will receive immediate notification;
- d) Procedures to ensure that appropriate staff and contract personnel are aware of and follow the OERP 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 untreated wastewater and prevent discharge of untreated wastewater to waters of the State and minimize or correct any adverse impact on the environment resulting from the SSO, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

*Section D.13(vi)(a) – (f):* The District SSMP on pages twenty-five to twenty-nine provide an Overflow Emergency Response Plan (OERP) for use in the event of a SSO. The times specified for reporting require updating, the SSS WDRs require a two hour notification time not twenty-four. The written procedures required to ensure District staff and contract personnel are aware of the OERP and written procedures to address emergency operations, traffic control, crowd control, spill mitigation and cleanup, and other necessary response activities were not provided during the audit and are not included in the SSMP. A program to inform and train District staff or contractors on how to prevent an SSO from reaching the surface water, in this case the Salinas River, were not provided during the audit and are also not included in the SSMP. Procedures to conduct training and additional surface water monitoring were not available. Reporting procedures have been updated in the 2018 Plan update to identify the (3) three Categories of SSOs (formally 2 categories) and comply with other requirements of the 2013 Monitoring and Reporting Program (MRP).

**Sufficiency:** Out of Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, pages 25 – 29, Appendix B and D.

**Deficiencies:** The Overflow Emergency Response Plan (OERP) does not meet requirements of the SSSWDR and 2013 MRP as specified above.

**Recommendation:** Prepare an updated OERP which includes a Monitoring and Reporting Program (MRP) consistent with the 2013 MRP, and associated emergency response procedures, forms, and training program.

## **Fats, Oils, and Grease Control Program [SSSWDR D.13(vii)]**

Each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee 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) An Ordinance establishing the legal authority of the District to prohibit FOG discharges to the system and identify measures to prevent SSO and blockages caused by FOG;
- d) Requirements to install grease removal devices (such as traps or interceptors) and the development of design standards for such devices, maintenance requirements, Best Management Practices (BMP) requirements, record keeping and reporting requirements;
- e) Authority to inspect grease producing facilities, enforcement authorities, and whether the District has sufficient staff to inspect and enforce the FOG ordinance;
- f) An identification of sewer system sections subject to FOG blockages and establish a cleaning maintenance schedule for each section; and
- g) Development and implementation of source control measures, for all sources of FOG discharged to the sewer system.

*Section D.13(vii)(a) – (g):* The District SSMP, on page thirty, states that the District conducted a self-evaluation and that a FOG Program was not required. The District has not experienced a FOG related SSO since its formation in 2000 to the date of this Audit. The District SSMP does state that the need for a FOG Program will be evaluated annually. Based on discussions with the Director of Utilities there continues to be no evidence that FOG is creating any operational or maintenance issues and therefore it is the District's position that a FOG Program is not required.

**Sufficiency:** Substantial Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 30

**Deficiencies:** The District established that a Fats, Oils, and Grease (FOG) Control Program was not necessary in 2010 however there has not been a formal evaluation (annually) of the status of FOG in the system per language found in this section.

**Recommendation:** If Commercial or Residential High Maintenance Areas (HMAs) are encountered in the collection system due to FOG, a program should be developed to identify and clean these areas on a more frequent basis and a public outreach and education program should

be developed to inform the public about FOG mitigation measures. If these measures do not prove to be comprehensive enough, a formal FOG Inspection Program should be developed.

## **System Evaluation and Capacity Assurance Plan (SECAP) [SSSWDR D.13(viii)]**

The Enrollee 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 a SSO discharge 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 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 agency 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 requirements as described in Section D.14.

*Section D.13(viii)(a) – (d):* The District SSMP, on page thirty-one, presents a summary of the 2005 San Miguel CSD Wastewater Master Plan as evidence that a SECAP was completed. In November 2017, the District adopted an update to the San Miguel Wastewater Masterplan which includes recommendations for 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.

**Sufficiency:** In Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 31 and Appendix E. 2005 San Miguel CSD Wastewater Master Plan

**Deficiencies:** The SECAP requirements have been addressed updating to correct the paraphrasing of the regulatory requirements for this section. The 2005 Wastewater Master Plan identifies hydraulic deficiencies in Chapter Five, but does not prioritize, summarize project progress, and include a schedule for completion of these projects as required. Appendix E includes the CIP, but not a schedule of completion dates as required by section D.13(viii)(d) or sources of funding as required by D.13(viii)(c). The CIP list also appears outdated and should be updated as necessary. Lastly, the SECAP schedule is required to be reviewed and updated in the SSMP in accordance with Section D.14.

**Recommendation:** The SECAP requirements have been addressed in the 2018 Update of the San Miguel CSD Wastewater Master Plan and the 2018 SSMP Update. The District should be diligent in its efforts to fund and implement the projects identified in the 2018 Wastewater Masterplan Update.

## **Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]**

The Enrollee shall:

- a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
- b) Monitoring 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.

**Sufficiency:** Out of Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 32.

**Deficiencies:** Monitoring, Measurement, and Program Modification activities to show that the SSMP was utilized as a tool for managing the sewer collection system were not presented during the audit. While the District to date has not experienced an SSO event, records in the form of maintenance work orders, sewer line cleaning reports, manhole inspection reports, SSO response procedures, contracts, updates to SSMP elements, etc. were not available as they have not been developed.

**Recommendation:** The General Manager, Director of Utilities, District Engineer and other applicable utilities staff should meet quarterly to review progress towards creation of and implementation of the required sections of the District's SSMP until such time that an acceptable program for Monitoring, Measurement, and Program Modification is prepared. Meeting minutes or notes should be maintained to track progress and to serve as a general record of these activities.

## **Sewer System Management Plan Audit [SSSWDR D.13(x)]**

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.

**Sufficiency:** Marginal Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 32 and Appendix F.

**Deficiencies:** The most recent SSMP Audit was conducted by the Wallace Group in 2014. The most recent audit was performed in May 2018, which is delinquent by approximately 2 years.

**Recommendation:** Perform the next SSMP Audit no later than May 2020.



## **Communication Program [SSSWDR D.13(xi)]**

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 communications with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

The District Communication Program presented in the SSMP was to post the SSMP on the District's website located at [www.sanmiguelcsd.org](http://www.sanmiguelcsd.org). The website was reviewed by the auditors during the audit and the SSMP is not posted. Adoption of the SSMP at the District Board meeting on September 24, 2010 was also presented; while this meets the requirement to communicate about the development of the SSMP, evidence of continuing to communicate with the public about the implementation and performance of the SSMP was not provided to the auditors.

The District does not have systems that are tributary to and/or satellite to the system so a communication plan for communicating with these types of entities is not required.

**Sufficiency:** Marginal Compliance

**Reference:** September 24, 2010 San Miguel CSD SSMP, page 34.

**Deficiencies:** The District Communication Program did not meet the requirement to communicate SSMP related information with the public on a regular basis.

**Recommendation:** The District is required to identify stakeholder groups in the public served and develop a communication program concerning the SSMP. Stakeholders include the commercial, industrial, and residential users within the San Miguel CSD service area boundary. Suggestions include posting the 2018 SSMP and 2018 Audit on the District's website and formal discussion of the SSMP and SSMP implementation at District Board Meetings.