



# San Miguel Community Services District Sewer System Management Plan, Revision 1 – May 24, 2018 Audit Report

July 31, 2020

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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

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 May 24, 2020 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 1 dated May 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 1, dated May 24, 2020, 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*

## 2020 San Miguel CSD Audit Meetings

| SSMP Audit Date | Location              | Attendees                    |
|-----------------|-----------------------|------------------------------|
| June 4, 2020    | 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 May 24, 2018 San Miguel CSD SSMP is in compliance with eight out of eleven subsections (elements) of SSSWDR Section D.13 and has been generally effective in the implementation of the SSMP. The District was found to be in substantial compliance with three 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><br>[SSSWDR D.13(i)]      | <b>In Compliance</b>                     | The goals stated in the May 24, 2018 San Miguel CSD SSMP, page 9. Are clearly stated and consistent with the requirements set forth in SWRCB adopted Water Quality Order No. 2006-0003-DWQ   | N/A  |
| <b>2. Organization</b><br>[SSSWDR D.13(ii)]     | <b>In 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 May 24, 2018 San Miguel CSD SSMP. Refer to Table 1. | Review and update key personnel and agency contact information as appropriate.   |
| <b>3. Legal Authority</b><br>[SSSWDR D.13(iii)] | <b>In Compliance</b>                     | The District should consider revising the “Sewer Use Ordinance” to specifically reference the legal authorities required in the WDRs.  | Revise the 1973 Sewer Use Ordinance by the end of December 2021 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, 2021.</p>   |
| <p><b>5. Design and Performance Provisions [SSSWDR D.13(v)]</b></p>             | <p><b>In Compliance</b></p>          | <p>This effectiveness of this section is clearly stated and consistent with the requirements set forth in SWRCB adopted Water Quality Order No. 2006-0003-DWQ.</p>  | <p>N/A</p>  |
| <p><b>6. Overflow Emergency Response Plan [SSSWDR D.13(vi)]</b></p>             | <p><b>Substantial Compliance</b></p> | <p>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>The District should prepare and implement a formal OERP training program to include written materials for District staff review and reference. .</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 periodically 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 2017 San Miguel CSD Water &amp; Wastewater Master Plan Update as evidence that a SECAP was completed. In November 2017, the District adopted the referenced update to the San Miguel Water &amp; 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 events</p> | <p>The District should be diligent in its efforts to fund and implement the projects identified in the 2018 Water &amp; Wastewater Masterplan Update.</p>   |
| <p><b>9. Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]</b></p> | <p><b>Substantial Compliance</b></p> | <p>Because the District’s proactive maintenance techniques have prevented any SSO since its creation in 2001, the monitoring and measurement SSO is not possible. The District continues to monitor the condition of the sanitary sewers in the HMAs and adjusts the frequency of cleanings to prevent any SSOs.</p>   | <p>The General Manager, Director of Utilities, District Engineer and other applicable utilities staff should meet periodically (minimum annually) to review the District’s need to create and implement a formal program for Monitoring, Measurement, and Program Modification.</p> |
| <p><b>10. SSMP Program Audits [SSSWDR D.13(x)]</b></p>                                | <p><b>In Compliance</b></p>          | <p>The 2020 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 June 2020 which is approximately one (1) month later than was required.</p>  | <p>Complete the next Audit prior to August 21, 2022. SSMP 5 Year Update is due May 24, 2023.)</p>   |

|  |                      |  |     |
|--|----------------------|--|-----|
| <b>11. Communication Program [SSSWDR D.13(xi)]</b> | <b>In Compliance</b> | The District posts the current SSMP and recent audits on the District website. | N/A |
|--|----------------------|--|-----|

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 May 24, 2018 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 2001). If an SSO occurs, the goal of the District is to perform a comprehensive analysis to determine 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 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:** May 24, 2018 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 the attached Figure 1; District Organization Chart; as the Director of Utilities, Kelly Dodds. 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 and included in the attached Table 1. 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 and are included in the attached Table 1.

**Sufficiency:** In Compliance

**Reference:** May 24, 2018 San Miguel CSD SSMP and attached Figures 1 and Table Nos. 1 and 2.

**Deficiencies:** None. The Organization element meets the requirements of the SSSWDR as specified above. District Organizational Chart (Figure 1) and Chain of Communication for Reporting SSOs (Table 2) has been updated and is included as an attachment to this document.

**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 May 24, 2018 San Miguel CSD SSMP states on page nineteen (19), that sewers and connections are required to be designed and constructed in accordance with the 2011 version of the San Luis Obispo County Department of Public Works Standard Improvement Specifications and Drawings. However, 2011 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 2019. The District updated it's "Additions and Modifications" to the

2019 SLO County Department of Public Works Standard Improvement Specifications and Drawing in May 2020.

This section is in substantial compliance with the requirement.

Additionally on page nineteen (19), the May 24, 2018 San Miguel CSD 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 May 24, 2018 San Miguel CSD SSMP, on page nineteen (19), 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 May 24, 2018 San Miguel CSD SSMP, on page nineteen (19), 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.

*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 May 24, 2018 San Miguel CSD SSMP, on page nineteen (19), references a Sewer Code.

**Sufficiency:** In 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 District should consider revising “Sewer Use Ordinance” specifically reference the above described legal authorities required in the WDRs, and should also be revised to reference the most current design standards to be adopted the District, since these standards can be modified by the District from time to time.

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

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

### **a. Collection System Map**

Each wastewater collection system agency shall maintain up to date maps of its wastewater collection system facilities, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable storm water pumping and piping facilities.

### **b. Preventive Operation and Maintenance**

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 Preventive Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders.

### **c. Rehabilitation and Replacement Plan**

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 system of ranking the conditions 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. Training**

Provide training on a regular basis for staff in sanitary sewer system operations and maintenance and require contractors to be appropriately trained.

### **e. Critical Parts Inventory**

Provide equipment and replacement part inventories, including identification of critical replacement parts.

*Section D.13(iv)(a):* The May 24, 2018 San Miguel CSD SSMP, on page twenty-one (21) states that "The District Engineer has developed atlas maps of the sewer collection system. The maps show manholes, cleanouts, and gravity lines with pipe diameter and material where known. These maps are updated on an as needed basis". The District Engineer has the responsibility to periodically update the Sewer Atlas as required to reflect expansions and changes to the sanitary sewer system. During this audit, it was confirmed that the sanitary sewer atlas maps have been

routinely updated since the May 24, 2018 San Miguel CSD SSMP was adopted by the Board. The sanitary sewer atlas maps were most recently updated in July 2020.

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-one of the May 24, 2018 San Miguel CSD SSMP, states that “each year all sanitary sewer pipelines are cleaned. Video inspection (CCTV) of the entire sanitary sewer system is programmed to be performed at 10-year intervals, based on available funds. The last full system video inspection performed was in 2002. Additional video inspection is to be performed as required on HMAs. There are several HMAs that require more frequent cleaning due primarily to proximity to local restaurants. The location and cleaning schedule of these areas is summarized as follows:

- The alley located west of Mission Street, between 12th Street and 14th Street. This segment is cleaned on an “as needed” basis, but typically at least twice per year.
- “N” Street, between 11th Street and 14th Street. This segment is cleaned on an “as-needed” basis, but typically at least twice per year.

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. The Director of Utilities confirmed that all sanitary sewer lines were cleaned in 2020.

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. The Director of Utilities indicated that the District plans to CCTV inspect all sanitary sewer lines prior to December 31, 2020.

*Section D.13(iv)(c):* The May 24, 2018 San Miguel CSD SSMP, Section 4.4 on page twenty-two, is entitled “Rehabilitation and Replacement Plan”. 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 2017 Update to the Water & 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 May 24, 2018 San Miguel CSD SSMP states, on page twenty-two, that District Staff who perform operations receive training as needed. The District does not have a

formalized training program. Additional training is provided to the operations staff on an as needed basis. Contract operations firms are chosen on the basis of expertise in specific areas and the District's past experience in working successfully with such firms. These specially chosen contract operators can bolster the District's operations in any areas the District lacks expertise.

The District training activities 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 in the past two years District Staff has undergone various training. Examples of this training included:

- Safety training
  - Confined space operations
  - Fall protection
  - First aide
  - Respiratory protection
  - Electrical safety
  - Traffic safety
- Operational training
  - Proper cleaning and maintenance of sewer lines and manholes
  - Training in procedures for SSOs
  - Identification of FOG and potential mitigation measures

*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:** May 24, 2018 San Miguel CSD SSMP, page 20 – 23, interview on June 4, 2020 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)]**

The District is responsible for reviewing and the following design and construction documents to ensure that all construction projects meet the District standards: The District is also responsible for updating standards for installation, rehabilitation and repair, as needed. The District retains the responsibility for inspections of construction projects to ensure District standards have been followed. Specifically, the following documents, standards and procedures shall apply for this Section.

- 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, pumps, and other appurtenances and for rehabilitation and repair projects.

*Section D.13(v)(a)*: The May 24, 2018 San Miguel CSD SSMP, on page twenty-three, states that the District “generally” relies on the most current version of the San Luis Obispo County Public Works Standards. It is understood from discussions with the Director of Utilities that the District updated the SMCSA Additions & Modifications (Supplemental Provisions) to the County of San Luis Obispo Public Improvement Standards to address certain areas where the District standards vary from the County’s. Additionally, in some cases where the County standards are not followed, the District staff and District Engineer provide review and approval based on a determination that the proposed alternative is equal to or better than the comparable County standard.

*Section D.13(v)(b)*: The May 24, 2018 San Miguel CSD SSMP, on page twenty-three, states that “the District standard procedure requires that all work to be inspected by and meets with the approval of the Director of Utilities prior to being placed into service. The District’s thorough inspection of new work to ensure proper installation is a key component to maintaining a properly operating system and maximizing collection system life cycle. Currently, the District inspection procedures for new gravity sewers, manholes and other appurtenances, etc. follow those set forth in the most current version of the SLO County Public Works Standards. The Director of Utilities confirmed that the practice described above is being followed.

**Sufficiency:** In Compliance

**Reference:** May 24, 2018 San Miguel CSD SSMP, page 23. 2019 San Luis Obispo County Public Works Standards, and 2020 SMCSA Additions & Modifications (Supplemental Provisions)

**Deficiencies:** None Noted.

**Recommendation:** None.



## 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 May 24, 2018 San Miguel CSD SSMP, on pages twenty-four to thirty, include a comprehensive Overflow Emergency Response Plan (OERP) for use in the event of a SSO. The OERP Reporting procedures identify the (3) three Categories of SSOs and complies with other requirements of the 2013 Monitoring and Reporting Program (MRP). During the audit interview, which was conducted on June 4, 2020, the Director of Utilities conveyed a comprehensive understanding of the OERP and provided a clear and concise description of the procedures required to ensure District staff and contract personnel are aware of the OERP and described procedures to address emergency operations, traffic control, crowd control, spill mitigation and cleanup, and other necessary response activities.

**Sufficiency:** Substantial Compliance

**Reference:** May 24, 2018 San Miguel CSD SSMP, pages 24 – 30, Appendix D and Table 1(See attached).

**Deficiencies:** None Noted.

**Recommendation:** Formalize the OERP training program to include written materials for District staff review and reference.

## **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 May 24, 2018 San Miguel CSD SSMP, on page thirty-five, 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:** In Compliance

**Reference:** May 24, 2018 San Miguel CSD SSMP, page 35

**Deficiencies:** None Noted

**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 May 24, 2018 San Miguel CSD SSMP, on page thirty-one, references the 2017 San Miguel CSD Water & Wastewater Master Plan Update as evidence that a SECAP was completed. In November 2017, the District adopted the referenced update to the San Miguel Water & 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:** May 24, 2018 San Miguel CSD SSMP, page 37 and the referenced 2017 San Miguel CSD Water & Wastewater Master Plan Update

**Deficiencies:** None Noted.

**Recommendation:** The District should be diligent in its efforts to fund and implement the projects identified in the 2017 Water & 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.

**As stated in the** May 24, 2018 San Miguel CSD SSMP, on page 37, and reiterated by the Director of Utilities during the June 4<sup>th</sup> interview, because the District's proactive maintenance techniques have prevented any SSO since its creation in 2001, the monitoring and measurement SSO is not possible. The District continues to monitor the condition of the sanitary sewers in the HMAs and adjusts the frequency of cleanings to prevent any SSOs. The Director of Utilities confirmed that if cleaning becomes more challenging or frequent prior to the CIPs planned to address the HMA's, the approach to preventing SSO will be re-evaluated and this SSMP updated accordingly.

**Sufficiency:** Substantial Compliance

**Reference:** May 24, 2018 San Miguel CSD SSMP, page 38.

**Deficiencies:** None Noted.

**Recommendation:** The General Manager, Director of Utilities, District Engineer and other applicable utilities staff should meet periodically (minimum annually) to review the District's need to create and implement a formal program for Monitoring, Measurement, and Program Modification. If conditions warrant the preparation of a formal program for Monitoring, Measurement, and Program Modification, then the SSMP should be revised at such time.

## **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:** In Compliance

**Reference:** May 24, 2018 San Miguel CSD SSMP, page 39, and the June 2020 SSMP Audit Report (See Attached).

**Deficiencies:** The most recent SSMP Audit was conducted by the Monsoon Consultants in June 2020, which is delinquent by approximately 1 month. The delay was due in part to challenges associated with the Covid19 pandemic.

**Recommendation:** Perform the next SSMP Audit no later than June 2022.

## **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 Board meets the 4th Thursday of each month at 1150 Mission (fire station) at 7:00 PM. These meetings are open to the public. The Director of Utilities and the District Engineer each provide written reports to the Board for each of these meeting. These reports are included in the Board packet which are posted on the District website and available for public access. These reports contain information regarding the status of the sanitary sewer system, including any failures or problems, a description of any impacts to customer service or the environment, and any repairs or construction projects that are associated with the system. Should the public have any further comments they are encouraged to provide it at any time. In addition to discussion at the public meetings the Sewer System Management Plan (SSMP) and recent audits are posted on the District's website: [www.sanmiguelcsd.org](http://www.sanmiguelcsd.org).

Annual reports are generated in January of each year. The annual report refers to the SSMP and any changes that have been made over the last year. These reports are submitted to the Regional Water Quality Control Board.

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:** In Compliance

**Reference:** May 24, 2018 San Miguel CSD SSMP, page 40.

**Deficiencies:** None Noted.

**Recommendation:** None.

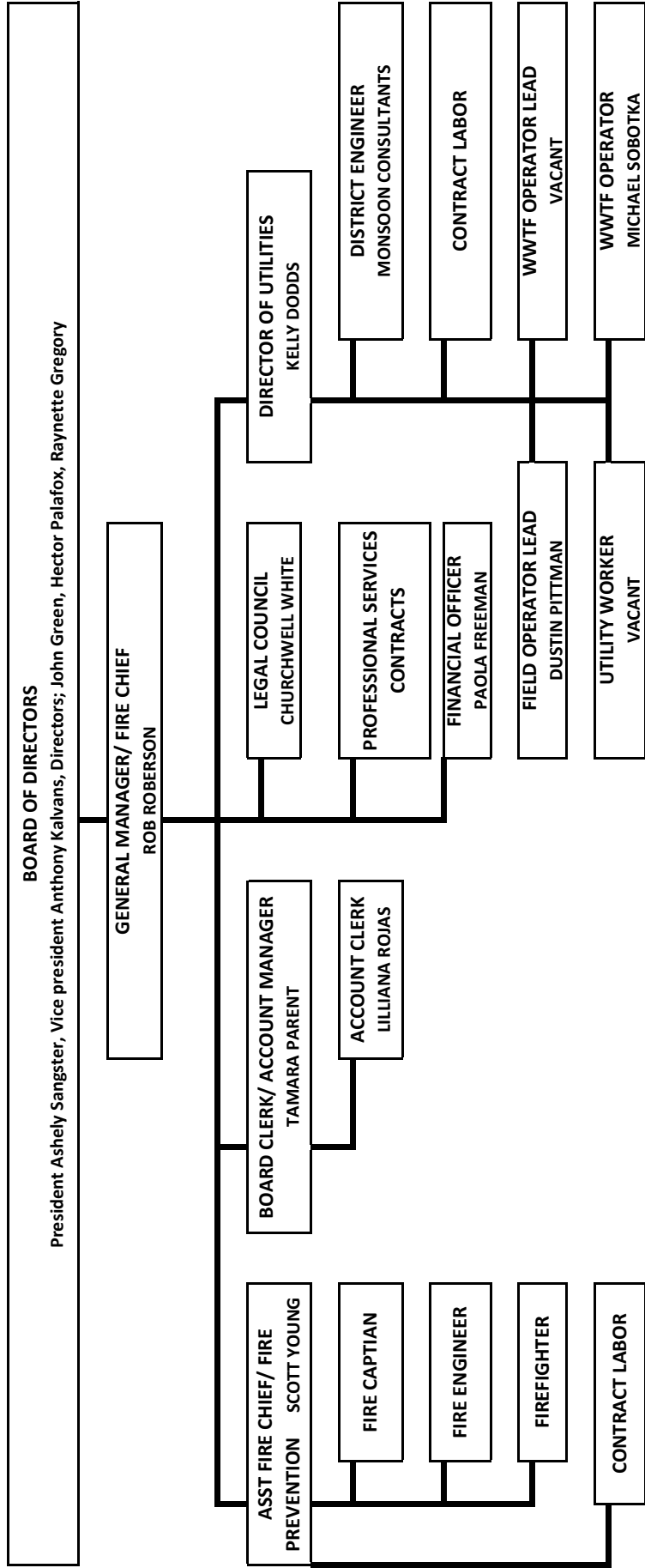
# **ATTACHMENTS**



**FIGURE 1  
DISTRICT ORGANIZATIONAL CHART**



**SAN MIGUEL COMMUNITY SERVICE DISTRICT  
ORGANIZATIONAL CHART**



Revised 7-20-2020

# TABLE 1 SSMP CONTACT INFORMATION

## ELEMENT 2 - ORGANIZATION

### Current Board Members

| Title          | Board Member     |
|----------------|------------------|
| President      | Ashley Sangster  |
| Vice President | Anthony Kalvans  |
| Director       | John Green       |
| Director       | Hector Palafox   |
| Director       | Raynette Gregory |

### District Contact Information

| District Office Telephone No. | 805-467-3388   |                     |
|-------------------------------|----------------|---------------------|
| Title                         | Staff Member   | Mobile Phone Number |
| General Manager               | Rob Roberson   | 805-441-4725        |
| Director of Utilities         | Kelly Dodds    | 805-291-0815        |
| WWTF Operator - Lead          | Vacant         | N/A                 |
| WWTF Operator                 | Mike Sobotka   | 805-674-9183        |
| Field Operator-Lead           | Dustin Pittman | 805-909-0417        |
| Utility Worker                | Vacant         | N/A                 |
| District Engineer             | Blaine Reely   | 805-280-1051        |
| District Legal Counsel        | Doug White     | 916-468-0950        |

### Agency Contact Information

| Title   | Office Phone Number |
|---|---------------------|
| CA Regional Water Quality Control Board               | 805-549-3689        |
| San Luis Obispo County Environmental Division         | 805-781-5544        |
| San Luis Obispo County Office of Emergency Services   | 805-781-5011        |
| Sherriff Watch Comander                               | 805-781-4553        |
| CAL EMA Warning Center                                | 1-800-852-7550      |
| Sherriff Watch Comander                               | 805-781-4553        |
| CA Department of Fish & Game (San Luis Obispo County) | 805-649-2817        |

**TABLE 2**  
**CHAIN OF COMMUNICATION FOR REPORTING SSO's**  
**SAN MIGUEL COMMUNITY SERVICES DISTRICT**

| SPILL NOTIFICATION CHART |   |  |  |
|--------------------------|---|--|--|
| SSO Category             | Reporting   | Notification   | CIWQS Regulatory Requirements  |
| Category - 1             | All SSO that reaches surface water <u>or</u> any SSO that reaches a drainage channel (MS4) and is not fully captured and returned to the sewer system.  | <ol style="list-style-type: none"> <li>1. Director of Utilities</li> <li>2. Cal OES - ASAP no later 2 hrs</li> <li>3. CCWQCB -ASAP no later 2 hrs. <i>Fax letter within 24hrs/follow up letter within 5 days</i></li> <li>4. SR Police/Environ Crime Unit</li> <li>5. County Environmental Health</li> <li>6. Fish &amp;Wildlife</li> <li>7. StormWater</li> </ol> | <p><b>Category 1 &amp; 2</b></p> <p>Draft reports for Category 1 &amp; 2 SSO shall be submitted to the CIWQS Online SSO Database <u>within three (3) business days</u> of the enrollee becoming aware of the SSO.</p> <p>A final Category 1 or 2 SSO report shall be certified through the CIWQS Online SSO Database <u>within 15 calendar days</u> of the end date of the SSO.</p> <p>Technical Report within 45 days of the SSO end date for any SSO in which 50,000 gallons or greater are spilled to surface waters.</p> |
| Category - 2             | All SSO greater than or equal to 1,000 gallons that do not reach a surface water <u>or</u> drainage channel (MS4) unless the entire SSO discharge to the storm drain system is fully recovered and disposed of properly | <ol style="list-style-type: none"> <li>1. Director of Utilities</li> <li>2. Cal OES - ASAP no later 2 hrs</li> <li>3. <b>C</b> CWQCB - ASAP no later 2 hrs. <i>Fax letter within 24hrs/follow up letter within 5 days</i></li> <li>4. SR Police/Environ Crime Unit</li> <li>5. County Environmental Health</li> </ol>  |  |
| Category - 3             | All other SSO less than 999 gallons   | <ol style="list-style-type: none"> <li>1. Director of Utilities</li> <li>2. Cal OES – ASAP no later 2hrs</li> <li>3. CCWQCB - 100 to 999 gal -no later than 2 hrs.</li> <li>4. SR Police/Environ CrimeUnit (if enters storm drain)</li> <li>5. County Environmental Health – ASAP no later 2 hrs.</li> </ol>   | All Category 3 SSO shall be reported to the CIWQS Online SSO Database and certified within 30 calendar days after the end of the calendar month in which the SSO occurs.   |
| Private Spill            | All Private Spills  | Director of Utilities  | Any spill resulting from a blockage or other problems within a privately-owned sewer connection may be <u>voluntarily</u> reported to the CIWQS Online SSO Database.   |
|                          | 5 Gallons or greater  | In addition - County Environmental Health  |  |
|                          | Enters Storm Drain & recovered  | In addition – Cal OES & SR Police  |  |
|                          | 100 to 999 Gallons  | In addition - CCWQCB – ASAP no later than 2 hrs.   |  |
|                          | >1000 gal/no surface water  | Refer to category 2 notification   |  |
|                          | Reaches surface water   | Refer to category 1 notification   |  |

**Appendix F – Element 10 – Sanitary Sewer Management Plan Audits  
SSMP Audit Form**

**Sewer System Management Plan Audit Report**

|  |  |
|--|--|
| Name of Agency   | SAN MIGUEL COMMUNITY SERVICES DISTRICT |
| Date of Audit  | 6/4/2020                               |
| Name of Auditor  | BLAINE REELY                           |
| <i>System Overview</i>                                       |  |
| LF of gravity sewer mains                                    | 45730                                  |
| LF of Public force mains                                     | 1229                                   |
| Total LF of all Public sewer lines                           | 46959                                  |
| Number of pump stations                                      | 1                                      |
| LF of private sewer mains, excl. laterals                    | *                                      |
| LF of private sewer laterals                                 | * Unknown                              |
| Population served  | <del>2000</del> (Approx) 2300          |
| Current average monthly single family residential sewer rate | \$98.75                                |

\*Source:

**I. GOALS**

- 1 Are the goals stated in the SSMP still appropriate and accurate? (Yes) / No
- 2 If you answered No to question 1, describe content and schedule for updates, or provide additional comments for Yes response at end of report.

**II. ORGANIZATION**

REFERENCE MATERIAL

- Organization chart
- Phone list

- 3 Is the SSMP up to date with agency organization and staffing contact information? (Yes) / No
- 4 If you answered No to question 3, describe content and schedule for updates, or provide additional comments for Yes response at end of report.

**LEGAL AUTHORITY**

REFERENCE MATERIAL

- Ordinances
- Enforcement actions

- 5 Does the SSMP contain up-to-date information about your agency's legal authority? (Yes) / No

## Sewer System Management Plan Audit Report

- 6 Does your agency have sufficient legal authority to control sewer use and maintenance? Yes / No
- 7 If you answered No to question 5 or 6 describe content and schedule for necessary changes, or provide additional comments for Yes response at end of report.

### IV. OPERATIONS AND MAINTENANCE

#### a. COLLECTION SYSTEM MAPS

##### REFERENCE MATERIAL

- Summary of information included in mapping system

- 8 Does the SSMP contain up-to-date information about your agency's maps? Yes / No
- 9 Are your agency's collection system maps complete, up-to-date, and sufficiently detailed? Yes / No
- 10 If you answered No to question 8 or 9, describe content and schedule for necessary changes, or provide additional comments for Yes response at end of report.

#### b. RESOURCES AND BUDGET

##### REFERENCE MATERIAL

- Current Capital Improvement Plan (CIP)
- Current operating budget

- 11 Does the SSMP contain up-to-date information about your agency's resources and budget? Yes / No
- 12 Are your agency's resources and budget sufficient to support effective sewer system management? Yes / No
- 13 Do your agency's planning efforts support long-term goals? Yes / No
- 14 If you answered No to questions 11, 12 or 13, describe content and schedule for necessary changes, or provide additional comments for Yes response at end of report.

## Sewer System Management Plan Audit Report

**c. PRIORITIZED PREVENTIVE MAINTENANCE**

REFERENCE MATERIAL

- Cleaning schedules
- List or map of hotspots
- Work orders
- Incidence Reports
- Customer feedback

**Table 1. Anticipated Annual Preventive Maintenance Activities**

| Maintenance activities (lineal ft/yr) | <del>2018</del> | <del>2019</del> | <del>2020</del> | <del>2021</del> | <del>2022</del> |
|---------------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| CCTV (video inspection)               | Y               |                 |                 |                 |                 |
| Cleaning with CCTV                    |                 |                 |                 |                 |                 |
| Cleaning                              | Y               | Y               | Y               | Y               | Y               |
| Smoke testing                         |                 |                 |                 |                 |                 |
|                                       |                 |                 |                 |                 |                 |
|                                       |                 |                 |                 |                 |                 |

- 15 Does the SSMP contain up-to-date information about your agency's preventive maintenance activities?  Yes /  No
- 16 Based on O & M history are your agency's preventive maintenance activities sufficient and effective in reducing and preventing SSO's and blockages?  Yes /  No
- 17 If you answered No to questions 15 or 16, describe content and schedule for necessary changes, or provide additional comments for Yes response at end of report.

**d. SCHEDULED INSPECTIONS AND CONDITION ASSESSMENT**

REFERENCE MATERIAL

- Inspection reports
- Infiltration and Inflow (I/I) monitoring studies and reports
- Pipe and manhole condition data

- 18 Does the SSMP contain up-to-date information about your agency's inspections and condition assessment?  Yes /  No
- 19 Are your agency's scheduled inspections and condition assessment system effective in locating, identifying, and addressing deficiencies?  Yes /  No

## Sewer System Management Plan Audit Report

20 If you answered No to questions 18 or 19, describe content and schedule for necessary changes, or provide additional comments for Yes response at end of report.

### e. CONTINGENCY EQUIPMENT AND REPLACEMENT INVENTORIES

#### REFERENCE MATERIAL

- Funds spent on equipment and materials
- Equipment and parts inventory

21 Does the SSMP contain up-to-date information about equipment and replacement inventories?

Yes/No

22 Are contingency equipment and replacement parts sufficient to respond to emergencies and properly conduct regular maintenance?

Yes/No

23 If you answered NO to question 21 and/or 22, describe content and schedule for necessary arrangements, or provide additional comments for Yes response at end of report.

### f. TRAINING

#### REFERENCE MATERIAL

- Employee training records

24 Does the SSMP contain up-to-date information about your agency's training expectations and programs?

Yes/No

25 Do supervisors believe that their staff is sufficiently trained?

Yes/No

26 Are staff satisfied with the training opportunities and support offered to them?

Yes/No

27 If you answered NO to questions 24, 25 and/or 26, describe content and schedule for necessary improvements, or provide additional comments for Yes response at end of report.

### g. OUTREACH TO PLUMBERS AND BUILDING CONTRACTORS

#### REFERENCE MATERIAL

- Flyers/mailings
- Mailing lists

## Sewer System Management Plan Audit Report

- 28 Does the SSMP contain up-to-date information about your agency's outreach to plumbers and building contractors?  Yes /  No
- 29 Has your agency conducted or participated in any outreach activities to plumbers and building contractors?  Yes /  No
- 30 If you answered NO to questions 28 and/or 29, describe content and schedule for future activities, or provide additional comments for Yes response at end of report.

**Table 2. Number of Permits issued to plumbers for work that could impact District facilities:**

|       |    |       |  |       |  |
|-------|----|-------|--|-------|--|
| 2018: | 20 | 2022: |  | 2026: |  |
| 2019: | 40 | 2023: |  | 2027: |  |
| 2020: | 9  | 2024: |  | 2028: |  |
| 2021: |    | 2025: |  | 2029: |  |

Permit process includes inspection by District staff.

### V. DESIGN AND CONSTRUCTION STANDARDS

REFERENCE MATERIAL

- Design and construction standards
- Ordinances

- 31 Does the SSMP contain up-to-date information about your agency's maps?  Yes /  No
- 32 Are design and construction standards, as well as standards for inspection and testing of new and rehabilitated facilities, sufficiently comprehensive and up-to-date?  Yes /  No
- 33 If you answered NO to questions 31 and/or 32, describe content and schedule for necessary revisions, or provide additional comments for Yes response at end of report.

### VI. OVERFLOW EMERGENCY RESPONSE PLAN

REFERENCE MATERIAL

- Data submitted to CIWQS
- Service call data



## Sewer System Management Plan Audit Report

**Table 3. Annual SSO Statistics**

| Indicator   | 2018         | 2019         | 2020 | 2021 | 2021 |
|---|--------------|--------------|------|------|------|
| Number of SSO's (total)   | <del>0</del> | <del>0</del> |      |      |      |
| Wet season SSO's*   |              |              |      |      |      |
| Dry season SSO's*   |              |              |      |      |      |
| Number of SSO's (by volume range)                                   |              |              |      |      |      |
| < 10 gal  |              |              |      |      |      |
| 10 – 99 gal   |              |              |      |      |      |
| 100 – 999 gal   |              |              |      |      |      |
| 1000 – 9999 gal   |              |              |      |      |      |
| ≥ 10,000 gal  |              |              |      |      |      |
| Total SSO Volume  |              |              |      |      |      |
| Volume reaching waters of the State                                 |              |              |      |      |      |
| Volume not contained by not reaching waters of the State            |              |              |      |      |      |
| Volume recovered  |              |              |      |      |      |
| Net volume (total minus recovered)                                  |              |              |      |      |      |
| Number of SSO's per 100 mile of sewer per year                      |              |              |      |      |      |
| Volume of SSO's per 100 mile of sewer per year                      |              |              |      |      |      |
| Total Volume conveyed to the plant (million gal)                    |              |              |      |      |      |
| Total volume SSO / Total volume conveyed, gallons / million gallons |              |              |      |      |      |
| Number of SSO (by cause)  |              |              |      |      |      |
| Blockages:  |              |              |      |      |      |
| Roots   |              |              |      |      |      |
| Grease  |              |              |      |      |      |
| Debris  |              |              |      |      |      |
| Debris from Laterals  |              |              |      |      |      |
| Animal Carcass  |              |              |      |      |      |
| Construction Debris   |              |              |      |      |      |
| Multiple causes   |              |              |      |      |      |
| Infrastructure failure  |              |              |      |      |      |
| Inflow & Infiltration   |              |              |      |      |      |
| Electrical Power Failure  |              |              |      |      |      |
| Flow Capacity Deficiency  |              |              |      |      |      |
| Natural Disaster  |              |              |      |      |      |
| Bypass  |              |              |      |      |      |
| Cause Unknown   |              |              |      |      |      |
| Average Response Times, minutes                                     |              |              |      |      |      |
| Business Hours  |              |              |      |      |      |
| Notification to arrival on site                                     |              |              |      |      |      |
| Notification to complete clearance                                  |              |              |      |      |      |

Form updated: 5/16/2018

Page 6 of 10

## Sewer System Management Plan Audit Report

|   |  |  |  |  |  |
|---|--|--|--|--|--|
| Non-business hours                      |  |  |  |  |  |
| Notification to arrival on site         |  |  |  |  |  |
| Notification to complete clearance      |  |  |  |  |  |
| Number of locations with multiple SSO's |  |  |  |  |  |

\*Wet season defined as \_\_\_\_\_, dry season \_\_\_\_\_. Season does not necessarily reflect conditions at the time of the SSO.

- 34 Does the SSMP contain up-to-date information of your agency's Overflow Emergency Response Plan?  Yes  No
- 35 Considering the information in Table 3, is the Overflow Emergency Response Plan effective in handling SSO's?  Yes  No
- 36 If you answered NO to questions 34 and/or 35, describe content and schedule for necessary revisions and implementation, or provide additional comments for Yes response at end of report.

### VII. FATS, OILS, AND GREASE (FOG) CONTROL PLAN

#### REFERENCE MATERIAL

- List or map of FOG sources in service area
- List or map of hotspots
- Cleaning schedules
- Restaurant inspection reports or summaries
- Data submitted to CIWQS
- Service call data

**Table 4. FOG Control Statistics**

|  | 2018 | 2019 | 2020 | 2021 | 2022 |
|--|------|------|------|------|------|
| <b>Number of SSO's caused by FOG</b>       |      |      |      |      |      |
| <b>Number of FOG inspections completed</b> |      |      |      |      |      |

- 37 Does the SSMP contain up-to-date information about your agency's FOG control program?  Yes  No
- 38 Considering the information in Table 4, is the current FOG program effective in documenting and controlling FOG sources?  Yes  No
- 39 If you answered NO to questions 37 and/or 38, describe content and schedule for necessary changes, or provide additional comments for Yes response at end of report.

## Sewer System Management Plan Audit Report

### VIII. CAPACITY MANAGEMENT

REFERENCE MATERIAL

- Capacity assessment reports
- CIP
- SSO data

**Table 5. SSO's Caused by Hydraulic Limitations**

|  | 2018 | 2019 | 2020 | 2021 | 2022 |
|--|------|------|------|------|------|
| Number of SSO's caused by capacity limitations | 0    | 0    |      |      |      |

- 40 Does the SSMP contain up-to-date information about your agency's capacity assessment?  Yes  No
- 41 Has your agency completed a capacity assessment and identified and addressed any hydraulic deficiencies in the system?  Yes  No
- 42 If you answered NO to questions 40 and/or 41, describe content and schedule for necessary activities, or provide additional comments for Yes response at end of report.  Yes  No

### IX. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

- 43 Does the SSMP contain up-to-date information about your agency's data collection and organization?  Yes  No
- 44 Is your agency's data collection and organization sufficient to evaluate the effectiveness of your SSMP?  Yes  No
- 45 If you answered NO to questions 43 and/or 44, describe content and schedule for necessary improvements, or provide additional comments for Yes response at end of report.

### X. SSMP AUDITS

- 46 Will this SSMP Audit be submitted with the Annual Report to the Regional Water Board within the required timeframe?  Yes  No

### XI. COMMUNICATION PROGRAM

REFERENCE MATERIAL

- Mailings and mailing lists



