

September 2011 – City of Norwalk

Sewer System Management Plan Biannual Audit

In review of the adopted City Sewer System Management Plan and the maintenance records, logs, and other forms for sewer related activity in 2009, 2010, and 2011 (partial), the City has prepared its audit findings below, in accordance with WDR#2006-003-DWQ:

1. Sewer System Management Plan

a. Goal

- To prevent sewer system overflows.

This goal was not reached for the following reasons. In 2010, there were no sewer overflow/spills reported to the State; however, audit of Public Services response records show there were three such Category 2 spill incidents that should have been reported through CIWQS, along with RWQCB and LA County Department of Public Health agencies. At the time, it was staff understanding that sewer overflows/spills were to be reported only if they entered the California waterways system. However, following recent meetings with the SWRCB, staff has learned that these should have been reported at the time of occurrence, as they are classified as a reportable Category 2 spill.

City's Public Services staff have thoroughly reviewed the adopted SSMP and reviewed SWRCB Order NO. 2006-0003-DWQ to clarify the categorization of the three types of overflow/spills and the required reporting procedures/ data to be submitted via the CIWQS system.

In August 2011, a category 2 spill occurred and staff responded/documented the spill and also telephonically notified the required agencies as well as the next workday through CIWQS. See greater detail provided below.

Spills occurred from the City owned system:

In 2009, there were no spills in the City's sewer system; thus, none were reported to Regional Water Quality Control Board/LA County Department of Public Health.

In 2010, there were three spills in the City's sewer system; however, none were reported through CWIQS nor the RWQCB/LA County Department of Public Health. As earlier stated, at the time, it was staff understanding that sewer overflows/spills were to be reported only if they entered the California waterways system. However, following recent meetings with the SWRCB, staff has learned that these should have been reported at the time of occurrence, as they are classified as a reportable Category 2 spill.

One spill occurred on August 20, 2010, around 12:49 p.m., at 14852 Piuma Avenue. The City's Emergency duty staff responded. Staff protected the catch basins to prevent runoff into ocean, and contacted sewer cleaning contractor to respond to the location. There was no documented entry of spill into basins/California waterways.

The second spill occurred on September 12, 2010, around 1:15 p.m., at Norwalk Blvd and Alondra Blvd. intersection. The City's Emergency Duty staff responded. Staff protected the catch basins to prevent runoff into ocean, and also contacted the sewer cleaning contractor to respond to the location. There was no documented entry of spill into basins/California waterways.

The third spill occurred on December 11, 2010, around 3:29 p.m., at Imperial Highway and Firestone Blvd. intersection. The City's Emergency Duty staff responded. Staff protected the catch basins to prevent runoff into ocean, and also contacted the sewer cleaning contractor to respond to the location. There was no documented entry of spill into basins/California waterways. However, in recent State Water Resources Control Board review of records/pictures, it was not clearly documented whether or not some overflow entered the basin/California waterways. City staff upon reviewing the same records after the fact could not confirm for certain if in fact such waste did or did not enter basins/waterways due to the incomplete/inadequate documentation. From what responding staff recalls in recent conversations, the spill did not enter any basins or the California waterways system.

A recent spill occurred on August 6, 2011, around 5:08 p.m., at the 12000 blk of Alondra Boulevard at Norwalk Boulevard. The City's Emergency Duty staff responded. Staff protected the catch basins to prevent runoff into ocean, and also contacted the sewer cleaning contractor to respond to the location. Documentation was completed, and showed the size of spill to be approximately 200 gallons, and 180 gallons were recovered. 20 gallons were not recovered, which entered the California waterways system. The appropriate notification was made by phone, that evening, to the LA County Department of Public Health and to the Regional Water Quality Control Board. Staff was then advised to contact the State Office of Emergency Services (OES), despite reporting a spill under 1,000 gallons. Staff proceeded to make that third contact and was advised by OES that no reporting to their agency is required if under 1,000 gallons. On Monday morning, August 8, 2011, staff made additional contact with the Regional Water Quality Control Board and submitted the SSO report via CIWQS.

Causes of the spills:

It is believed the causes of the spills were due to heavy grease buildup. The City's contractor was called out to the location to perform cleanup of each of those affected mains.

Steps need to be added to SSMP to prevent re-occurrence:

The City finds that at this time no additional steps/action needs to be added to the existing SSMP. However, to prevent re-occurrence of any deficiencies/noncompliance, the City's Public Services/Engineering/Building & Safety staff began quarterly meetings in August 2011, to discuss questions/issues/clarification concerning the SSMP. These meetings are currently chaired by the City Engineer, who will provide direction to City staff as needed. Continuous review and refresher training of the SSMP will help ensure staff follow the processes/requirements at all times.

- To minimize the impact of SSO's that do occur by preparing a proper Overflow Emergency Response Plan, training its staff, and implementing the plan

Public Services Emergency responder staff was not properly documenting the extensive detail needed to demonstrate response/cleanup activities resulting from the overflow/spill.

To ensure improved complete documentation in the future as it relates to sewer spills/overflows, Public Services staff has revised the existing work log forms. The new forms will be used by City first responder staff in the field. The contractor already provides the City with a detailed daily cleaning log that states location, manhole numbers, footage, size of trunk, and conditions found at time of cleaning (i.e. grease and debris, roots,etc). Lastly, a third form completed by office staff (attached) to track information reported has been modified to provide greater detail that will help responding field staff to follow-up more thoroughly.

Additional training of Public Services emergency responders, combined with Engineering staff, has taken place. This included re-review of the SSMP plan, particularly the Operations and Maintenance and Sanitary Sewer Overflow Emergency Response Plan. All forms have been discussed in detail as well as notification procedures to the proper agencies. Only those selected trained personnel are able to respond to sewer spills occurring in the future.

Additional training of Citywide office staff was also scheduled and completed. A detailed review of the revised form was given, along with reemphasis of immediate notification to the Public Services Department (working hours/after hours) of any information received through phone calls/walk-in relating to any sewer overflow/spill matter.

b. Organization

- Establishing authorized official/representative.

As indicated in the plan, the City's Legally Responsible Official is the Public Services Director.

- Establishing names and phone numbers of different positions responsible for implementing specific SSMP measures, as identified through an organizational chart.

This objective was fulfilled, as shown pages 4-9 of the Sewer System Management Plan booklet. A chart was developed as well as names of designated positions and their responsibilities relating to plan implementation.

However, Public Services and Engineering staff were accessing the CIWQS system to report spill activity on a monthly/annual basis as well as completing certification statements, although the designated legal responsible official was the City Manager.

Corrective action has been taken, and Public Services and Engineering staff have now been authorized as Legal Responsible Officials (LRO) to lawfully submit monthly/annual spill reporting data via CIWQS. Those Officials no longer with the City have been removed from the system as LROs.

- Establish chain of communication for reporting SSO's.

Detailed procedures were established in the SSO Emergency Response plan. The flow of communication remains the same as outlined in the flow chart provided following page 9 of the Sewer System Management Plan.

Reports of overflows are to be documented by office staff in a special tracking sheet, which was created in the initial 2009 adopted plan. As earlier indicated, since then, that form has been revised to provide better detail and to add language reminding staff of the importance of proper documentation and immediate reporting to the Public Services Department for a field response.

The City had not continued annual ongoing training for office staff or responder staff, to help ensure new employees follow correct procedures when receiving information from the public or field response. Corrective action has been taken and a refresher training was conducted in September 2011, with all City Departments' key clerical/office staff. This type of training will continue to be scheduled at least once annually.

At the time of this audit, there was no separate shared database for tracking of sewer related system overflows/spills. This information was only being centrally tracked in a Public Services database combined with all other type of requests/calls, such as tree trimming, sidewalk hazards, etc. Corrective action has been taken and there is now a separate database solely for tracking of sewer system overflow/spill activity. This database is centrally located on the City's shared computer W drives so both Engineering and Public Services Departments can access at any time.

c. Legal Authority

The City is in compliance and has established legal authority by adopting the below listed City and LA County codes, in order to prevent illicit discharges into sanitary sewers system; require sewers and connections be properly designed and constructed; ensure access for maintenance, inspection or repairs for portions of the City's lateral; limit the discharge of fats, oils, and grease/debris that may cause blockage; and enforce any violation of the sewer ordinance.

LA County Code Title 20, relating to Sanitary Sewer and Industrial Waste

CA Plumbing Code related to the prohibition of illicit discharges

Title 28 of the LA County, referencing the 2007 California Plumbing Code, for the design and construction of the sewer system

LA County Code Title 20, relating to required access to sewer facility

LA County Code Title 20, relating to the legal authority to limit FOG (Fats, oils, and greases); to ensure sewers be kept free of FOG and debris blockages

Norwalk Municipal Code Chapter 13, which empowers the City to enforce Title 20, Division 2, relating to sanitary sewers and industrial waste regulating the Public Services Title 13. Additionally, the design standards for construction of sanitary sewer systems and for sewer facilities have also been developed. Lastly, the

2. Operations and Maintenance Program

Properly manage, operate, and maintain all parts of the sanitary sewer system owned by the City; and ensure system operators are properly trained

The City's sewer system is cleaned every three years (1/3 of system each year) by trained contract staff through Empire Pipe Cleaning. These staff members hold CWEA licenses as appropriate. Please note the completed SSMP indicates that the sewer system is cleaned every 2 years, as at that time, the City had funding for this cleaning schedule. Since then, the City has had to reduce funding due to financial hardship, and the cleaning is now every 3 years.

Lift station inspections are performed by City staff on a weekly basis, and they are trained in identifying items on a checklist to note when servicing/repair of equipment is needed.

Jimini Systems is hired by the City to maintain the pumps and motors for preventative maintenance needs and/or if parts break down. These staff are licensed to conduct this type of work.

If sewer replacements/repairs are needed, the City will contract out this work to a licensed contractor, such as Doty Brothers or Precision Pipeline.

Maintain up to date map of the sanitary sewer system

The City's Engineering Department maintains an updated sewer map using Autocad programming.

Maintain a system to maintain routine preventative operation and maintenance activities by staff and contractors; including a system for scheduling regular maintenance and cleaning of the system with more frequent cleaning and maintenance targeted at known problem areas. System should have documentation for such scheduled and conducted activities, such as work orders.

The current routine maintenance operation includes having the entire system cleaned once every three years, by contractor. Hotspots are cleaned twice a year, or more often if needed. Records are provided to the City to document areas cleaned.

CCTV inspections are conducted by contractor annually, for approximately 70,000 linear feet of the system. Records are provided to the City to document areas cleaned.

The existing maintenance schedule consists of staff checking the lift stations weekly, to inspect pump/motor equipment. This information is recorded on the City's preventative maintenance logs.

Staff also responds to non-overflow sewer complaints and a work order is generated to track follow-up activity. Upon the work order being completed, staff note the action taken to resolve the issue and the information is updated into the system. Work order activity is tracked in the Department shared Access drive.

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. Include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Plan should include a CIP that addresses proper management and protection of the infrastructure assets, to include a time schedule for implementing short- and long-term plans plus a schedule for developing funds needed for the CIP.

At this time, there is no scheduled plan or an established fund to address the short-term and long-term improvements that will correct the systemwide capacity and structural deficiencies found thus far. To date, the City has not completed any Capital Improvement Projects related to the sewer main replacement/repairs, as identified

through CCTV inspection results. However, the CCTV records have been reviewed annually, and placed in a database to show sewer pipelines, condition, and type/severity of damage (if any), whether cracks, root intrusion, heavy grease, etc. The City has completed three years of CCTV inspections of the system, and will continue its fourth year of inspections by year's end.

3. **Design and Performance Provisions:**

Sewer Standard Plans and Design Standards for Sewer Facilities

This SSMP Component prepared by AKM Consulting Engineers dated April 2009 appears to be adequate for the design and construction of all sanitary sewer systems in Norwalk. The standards are similar to the Standard Specifications for Public Works Construction that is an accepted standard for this region of California.

4. **Overflow Emergency Response Plan**

Ensure proper notification procedures are in place so that responders and regulatory agencies are informed of SSO's in a timely manner

The City's clerical staff who handle main public contact via answering phone calls, or walk-in activity, are trained in receiving information from any individual relating to a sewer overflow. They are trained in procedures to complete the form, and making immediate contact with the Public Services Department, during regular working hours, and after hours. They are also informed that such form must be routed to the Department for documentation tracking.

The City's Public Services water staff are trained in the notification procedures to the County and State agencies upon responding to an SSO. These contact numbers for regular work hours/after hours are kept in the City's Emergency Duty binders which they access whenever they are out in the field addressing an issue on a 24 hour basis.

Currently, the notification to the regulatory agencies would be handled by the Supervisor and/or the Superintendent, followed with the SSO report submittal via CIWQS.

Implement a program to ensure appropriate response to all overflows.

The Public Services Water staff are trained to respond to SSO's on a 24 hour basis. They assigned to 24 hour overtime duty 365 days a year. They have the proper tools and equipment to respond to location and prevent overflows from entering the drains/waterways. They also have the 24 hour number for the City's contractor to respond and address the manholes in the area on an emergency/immediate basis.

Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities

As earlier stated, the City's Public Services water staff are trained in the notification procedures to the County and State agencies upon responding to an SSO. They are trained to respond to emergencies and are assigned 24 hour overtime duty 365 days a year. These contact numbers for regular work hours/after hours are kept in the City's Emergency Duty binders which they access whenever they are out in the field addressing an issue on a 24 hour basis.

Currently, the notification to the regulatory agencies is handled by the Supervisor and/or the Superintendent, followed with the SSO report submittal via CIWQS.

Procedures to ensure appropriate staff/contractors follow the Emergency Response Plan and are appropriately trained

Staff are following the Emergency Response Plan, from responding immediately to the location of the spill, to making the proper notifications to the LA County Public Health Department, Regional Water Quality Control Board, and Office of Emergency Services.

The contractor has also been provided a copy of the City's Sewer System Management Plan.

Procedures to address emergency operations, such as traffic/crowd control and other response activities

The Public Services Water staff are trained, and assigned 365 days a year, to respond to SSO's on a 24 hour basis. They have the proper tools and equipment to respond to location and prevent overflows from entering the drains/waterways.

They also have the 24 hour number for the City's contractor to respond and address the manholes in the area on an emergency/immediate basis.

Whenever a contractor responds to the location, the initially responding City staff stays on the scene until the contractor is finished with any cleanup/pumping activity. Through this time, City staff assist with conducting any needed traffic control, via use of delineation, arrow boards, or contacting Public Safety/Sheriff Department to assist. City staff are trained in conducting traffic control following the State WATCH guidelines.

Ensure all reasonable steps are taken to contain and prevent the discharge of untreated wastewaters to waters of the United States and to minimize/correct any adverse impact on the environment resulting from the SSO's including accelerated monitoring needed to determine nature/impact of discharge

The City takes a proactive effort in cleaning its sewer system on a regularly scheduled basis as the current budget allows. This means cleaning one-third of the system every year, and the hot spots twice a year. Although there have been overflows in the past years, the City believes this cleaning schedule has been effective in controlling blockages and preventing overflows citywide. The City will make adjustments to the cleaning schedule once deemed necessary, if overflow/blockage activity citywide were to increase, both inside and outside hot spot areas.

The City's trained staff are assigned to respond to any sewer spill/blockage issue on a 24 hour basis, to ensure that no matter what day of the year, or time of the day, that action is taken immediately to prevent any resulting SSO from entering the water system.

Once an overflow incident has occurred, the City's staff monitor that area to inspect for any build-up of grease/blockages that could potentially result in another overflow.

5. FOG Control Program

Implement a program and schedule for public education outreach program that promotes proper disposal of FOG

Due to the City's contracting of industrial waste inspection/enforcement services, the County conducts this educational outreach component. County provides food

service establishments (FSE's) with signage and literature promoting proper best management practices to operate in the kitchen. Additionally, each FSE is expected to properly train its employees as to BMP's to limit FOG discharges, and are required to maintain training schedule and logs. The City can inspect these upon a visit to the FSE.

The City, through a Property Maintenance Inspector, also provides the FSE with educational literature upon inspecting the FSE's randomly through the year. The City conduct inspection of FSE's to investigate information/complaints received relating to improper FOG disposal, and or as part of routine inspection procedures.

Develop a plan and schedule for the disposal of the FOG generated within the sanitary sewer service area. May include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer service area

Depending on the type of FSE and type of grease removal device, the FSE's are expected to privately contract with an appropriate waste disposal company to have the FOG waste disposed of. They are made aware that they cannot dispose of this type of FOG waste into the regular sewer system. This information on proper FOG disposal and facilities is provided to the FSE by the County.

The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG.

The City has established legal authority through adoption of title 20 LA County code relating to sanitary sewers and industrial waste. The County is the enforcement/inspection agency as contracted by the City to conduct annual inspections. County may impose additional measures on the FSE, such as more stringent kitchen BMP's or installation of larger OFG disposal facilities.

The City also conducts inspections to ensure removal devices remain in place and are working properly, in response to any complaints/information, or randomly through the year.

Requirements to install grease removal devices (traps/interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, recordkeeping and reporting requirements.

The City requires the FSE owner/operator to get clearance from the LA County Industrial Waste division, prior to the City issuing a permit to do any type of improvement on the interior of any business that has a freshwater supply; or connection to sewage supply. Upon reviewing FSE plans, the County inspects and determines if they are required to obtain an industrial waste permit. The County imposes the requirement to install the appropriate grease removal devices. The FSE owner/operator then has to pull a sewer permit from the City to install the removal device, and upon its installation, the City's Inspector inspects location to make sure the device is installed appropriately.

The County follows up to inspect these businesses annually as well.

Authority to inspect grease producing facilities, enforcement authorities, and whether enrollee has sufficient staff to inspect and enforce the FOG ordinance

The City has established legal authority through adoption of title 20 LA County code relating to sanitary sewers and industrial waste. At this time, the City contracts with LA County for annual inspection of businesses through the FOG program. The City also conducts inspections at random or upon complaint as earlier indicated.

Identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section

When complaints of sewer blockages take place possibly relating to any FSE, (or if the City/Contractor while conducting sewer line inspections/cleaning determines an identified blockage is likely due to an FSE), the City's Property Maintenance Inspector visits the establishment to determine if the grease removal device is properly installed. Upon detecting any change to the kitchen/food handling operation, the City will contact the County Industrial Waste Division for their inspection and to determine if additional grease removal devices (or changes to them) are necessary to limit and/or prevent resulting blockages to the sanitary sewer system.

If these type of blockages continue, the City and County will continue inspection of the FSE to resolve the issue with FOG waste handling and/or determine if improper disposal into sewer system is taking place. The appropriate enforcement action will take place if any violations are found.

Development and implementation of source control measures for all sources of FOG Discharged to the sanitary sewer system for each section identified above.

As stated above, the City and County Inspector inspect FSEs to determine if changes have been made to the handling of food/disposal measures that contribute to increased FOG deposits in the sewer system. Upon inspection, the City in coordination with the County, would require the replacement or enhancement of grease removal devices to ensure FOG waste disposal remains effective.

6. **System Evaluation and Capacity Assurance Plan:**

Evaluation

AKM Consulting Engineers prepared this component of the SSMP dated April 2009. An evaluation of this plan demonstrates the City's effort for identification of capacity improvements based on approved design criteria and it lists associated costs. It also lists specific deficiencies which is critical in improving the overall system. The evaluation provided estimates of peak flows (including flows from SSO's 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.

Design Criteria

The design criterion that AKM used appears to be an accepted standard of practice to identify deficiencies in the system and has successfully done so with the methods that they used. They used a System Hydraulic Model, Geometric Model, took into account Land Use and Flow Monitoring, Unit Flow Factors, Average Dry Weather Flows, Peaking Criteria, Trigger Depth to Diameter Ratios, Hydraulic Analysis and Lift Station capacities to arrive at their capacity enhancement recommendations.

Capacity Enhancement Measures

As a result of AKM's efforts using the design criteria mentioned above, they have listed specific deficiencies that would enhance the sewer system capacity in Table 5 and 6 of this portion of the SSMP.

Schedule

At the time of this evaluation, no funding source has been identified to address the needed improvements although general fund money has been appropriated in FY 11/12 and diverted away from other City priorities to accomplish this effort. To date, the City has not completed any Capital Improvement Projects related to the sewer main replacement/repairs to address deficiencies found in the system through CCTV inspection results. However, the CCTV records have been reviewed annually, and placed in a database to show sewer pipelines, condition, and type/severity of damage (if any), whether cracks, root intrusion, heavy grease, etc.

The City's sewer rate fee structure study has not been completed but is in progress; thus, the City still has not implemented a sewer rate fee to assist with the development of a multi-year long-term capital improvement program to replace deteriorated/damaged/undersized sewer mains. The City still did initiate the allocation of City's general fund monies (\$500,000) to initiate the first year of a sewer main replacement program, although no projects were completed to date.

The City is in the process of rehiring the consultant used to prepare the SSMP. The consultant will be tasked with completing a sewer rate fee structure study, by March 2012. By June 2011, the City Council will be presented with the results of such study for consideration of a proposed citywide sewer rate fee.

Capital Improvement projects that have been implemented:

Since implementation of the SSMP, the City has completed capital improvement projects relating to the annual CCTV inspection of the sewer system. In FY 09/10, FY 10/11, and FY 11/12, a total of \$61,000 was budgeted annually for the ongoing CCTV work. Approximately 60,000 – 70,000 linear feet of sewer mains will continue to be CCTV'd annually. The City estimates the entire sewer system will be CCTV'd by 2016, spanning a completion timeframe of approximately 7 years since start of the program.

There have been no other completed Capital Improvement projects completed relating to the City's sewer system. In FY 09-10, the City did budget \$500,000 to initiate a multi-year sewer main replacement program in conjunction with the adopted SSMP. However, no replacement projects of that nature were completed, due to a combination of staffing shortages and the City's economic hardship.

In FY 10-11, the amount for the replacement program was reduced to \$218,500, but no projects were completed.

Again, the City's past inability to carry out these scheduled replacement projects were largely due to unexpected decreases in the City's revenues while facing increased

expenditures. Not to mention a shortage of technical staffing, particularly in the Engineering area. It should also be noted that Engineering staff was faced with completing simultaneous infrastructure grant projects that took priority due to strict funding deadlines.

In FY 11-12, \$218,500 was again budgeted for this same purpose. Currently, following the arrival of the new City Engineer in July 2011, Engineering and Public Services staff are reviewing the CCTV inspection results to prioritize damaged sewer main segments for repairs/replacement. The City expects to have Year 1 of the Sewer Main replacement program finally completed by June 30, 2012.

Next year's Capital Improvement Program:

In FY 12-13, the City expects to have additional funding allocated to continue Year 4 of the annual CCTV inspection program. The City also is expecting additional funding to complete Year 2 of the Sewer Main replacement project. Funding levels will not be approved by the City Council until May/June 2012.

7. Monitoring, Measurement, and Program Modifications

Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities

The City maintains current updated records of sewer related activity, such as routine cleaning and CCTV inspection videos. These are reviewed to make adjustments to the triannual cleaning schedule of system, as well as address hotspot cleaning as needed.

Monitor the implementation and where appropriate, measure the effectiveness of each element of the SSMP

The elements of the SSMP have been implemented, except for the Capital Improvement program activities to address capacity/condition needs. It is due to limited resources (financial and staffing) that this element has not been implemented. The remaining elements will be assessed to measure their effectiveness and make adjustments as needed.

Assess the success of the preventative maintenance program

That assessment of the preventative maintenance program is an ongoing task and will continue in an effort to meet primary goal of reducing the likelihood of SSO's. Due to the low number of SSO's the City has experienced in the last two years, the City believes that the existing scheduled routine / hot spot cleaning is adequate. Should there be an increase in SSO related activity, the City will take

action to address and prevent such occurrences, by reviewing frequency of cleaning hot spots/siphons; and/or taking emergency action to repair broken sewer lines.

Update program elements, as appropriate, based on monitoring or performance evaluations

The elements of the program have not yet been updated. Staff will continue to monitor these to determine what updates are needed.

Identify and illustrate SSO trends, including frequency, location, and volume.

The City has a tracking database to identify SSO activity. Staff will review these locations on a continuous basis to determine if any patterns exist and to take action to address these.

8. Communications

Communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. Provide the public the opportunity to provide input to the City as the program is developed and implemented

The City's SSMP plan is uploaded to the City's website where it can be more readily available to the public. The plan is also available at the City Clerk's office. At the time of the plan's adoption in 2009, a public hearing was scheduled to allow the public the opportunity to provide comment.

Create a plan of communication with systems that are tributary and/or satellite to the City's sanitary sewer system

The City is a member of the San Gabriel River Gateway Authority, which consists of cities in the adjacent geographic regions that share similar requirements/issues related to the MS4 permit and WDR order. Staff is in communication with these agencies to discuss items relating to the sewer system and State permit regulations.

Adjustments:

The SSMP will be revised in 2014 as indicated following five years from adoption. If any critical revisions need to be made prior to that timeframe, the changes will be presented to the City Council for review/implementation.

Completed by: *Grissel Chavez, Public Services Superintendent*
Dan Garcia, City Engineer

September 15, 2011