Sewer System Management Plan (SSMP)

(Final Report)

December 16, 2014

City of Norwalk
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ABBREVIATIONS

BMP - Best Management Practice

CIP - Capital Improvement Program

CIWQS - California Integrated Water Quality System

CWC - California Water Code

DPS – Director of Public Services

Enrolee/Permittee/City – City of Norwalk

FOG - Fats, Oils, and Grease

FPS - Feet per Second

FSE – Food Service Establishment

GIS - Geographic Information Systems

HFI - Hall & Foreman, Inc.

I/I or (I and I) - Infiltration/Inflow

KPI - Key Performance Indicator

LACSD - Los Angeles County Sanitation Districts

LRO - Legally Responsible Official

MRP - Monitoring and Reporting Program

MMRP - Measurement, Monitoring and Reporting Procedures

NOI - Notice of Intent

NMP – Norwalk Municipal Code

NPDES - National Pollutant Discharge Elimination System

OES - Office of Emergency Services

O&M - Operations and Maintenance

PDWF - Peak Dry Weather Flow

RWQCB - Regional Water Quality Control Board

SECAP - Sewer System Evaluation and Capacity Assurance Plan

SSMP - Sanitary Sewer Management Plan

SSO - Sanitary Sewer Overflow

SWRCB - State Water Resources Control Board

UPM – Utilities & Projects Manager

VCP - Vitrified Clay Pipe

WDR - Waste Discharge Regulations

Table of Contents

Executive Summary

This plan document was initially prepared in 2009 and updated in 2014 in compliance with a formal order issued by the State Water Resources Control Board. The order requires every owner and operator of publicly owned sewer systems to develop and implement a system specific Sewer System Management Plan (SSMP). This plan sets forth goals and actions to be followed, and guidelines for various activities involved in managing, operating, maintaining, repairing, replacing and expanding the sewer system. Section 8 describes actions to follow when responding to a Sewer System Overflow (SSO) occurrence within the community, including reporting obligations. There are chapters which describe legal authorities for managing the system, and ministerial actions required in monitoring, auditing, reporting and communicating with the public and regulators. There are specific requirements for accomplishing public involvement and the reporting and modifying (changing) of the plan. These later requirements are intended to raise public awareness of the hazards associated with SSO events and to minimize the occurrence of such events.

- The City's updated plan is to be approved and certified before December 31, 2014
- The plan is to be monitored and updated no less frequent than every five years
- The plan must be periodically audited for effectiveness, a report compiled and kept on file and such audits must occur no less frequent than every two years
- There are reporting timeframes for both emergency and routine reporting events
- Copies of the approved plan must be available for public review, and when requested by the State or Local regulatory agencies copies are to be provided, including any audit reports.

Based on a comprehensive audit and overall review of our SSMP, the 2009 Sewer Master Plan (SMP), discussions with the Public Services Department staff, and a review of all other related documents, the City of Norwalk hereby certifies that all SSMP Goals are on-going and are on-track.

SECTION 1 Introduction

Gap analysis is a means of examining systemic factors that have contributed to, or caused, a gap between the current state of the system and the future and desired state outlined in the Waste Discharge Regulations (WDR) compliance requirements. The gap analysis process includes an in-depth analysis of the factors that have created the current state, laying the groundwork for improvement planning. This approach ensures that the system improvement process does not jump from identification of problem areas to proposing and implementing solutions without first understanding the conditions that created the current state.

1.1 Service Area and Sewer System

The City of Norwalk is located in Los Angeles County, California with a population of approximately 106,000. The City of Norwalk was incorporated on August 26, 1957 becoming L.A. County's 66th City. Located in the midst of some of Southern California's most accessible highways in the greater Los Angeles area, and located only 17 miles southeast of Los Angeles, the 9.35 square miles that make up the City of Norwalk have become one of the most rapidly developing and growing communities anywhere in the state of California. The City of Norwalk is approximately 95 feet above sea level, has an average temperature of 63 degrees, and averages an estimated 10 inches of rainfall per year. The City of Norwalk proudly celebrated its 50th anniversary as a city during 2007, and with a community sense of pride and accomplishment, eagerly looks forward to an even brighter future. The City is governed by five council members a year on a nonpartisan basis. The mayor and vice mayor are selected each year by the council members. The city uses the city manager form of government. Council meetings are held at 6 p.m. on the first and third Tuesdays of the month in the Council Chambers, located at City Hall. All council meetings are open to the public and members of the community are encouraged to attend and bring their views to the council.

The City of Norwalk's sewer system serves the area consisting of all lands within its corporate boundaries (9.35 square miles) as well as a portion of the City of Santa Fe Springs (approximately 0.23 square miles) at the northern and southeastern abutment to the City. The City provides sewer service to a population of approximately 106,000. The existing sewer collection system consists of about 865,000 feet (164 miles) of gravity sewers ranging in size from 6-inches to 18-inches in diameter, including 16 siphons. The City also owns three lift stations with approximately 162 feet of force main.

The City is dedicated to improving the condition and performance of its wastewater collection system and reducing the occurrences of SSOs. Development and implementation of a wastewater collection system Operations and Maintenance (O&M) program serves to ensure that the wastewater collection system is routinely and properly maintained in a manner that minimizes failures and extends the longevity of the system.

1.2 Regulatory Overview

The State Water Resources Control Board (State Water Board) adopted Water Quality Order 2006-0003, on May 2, 2006, requiring all public agencies that own sanitary sewer collection systems greater than one mile in length to comply with the Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems. All public agencies must apply for coverage by November 2, 2006, by completing the notice of intent (NOI) and legally responsible official (LRO)

forms that the State Water Board distributed. The City of Norwalk has completed the NOI and is within the regulatory time frames.

The intent of the WDR is to provide consistent statewide requirements for managing and regulating sanitary sewer systems throughout California. The State Water Board recognized a need to provide this consistent regulatory measure because many of the Regional Water Boards were beginning to implement similar measures inconsistently throughout the State, which was creating confusion in the discharger community. The State Water Board believes that providing a consistent regulatory measure that identifies regulatory expectations and comprehensive sanitary sewer overflow data will ultimately yield better collection system management and performance.

There are three major components to the WDR, including:

- Sanitary Sewer Overflow (SSO) Prohibitions;
- Sanitary Sewer Management Plan (SSMP) Elements; and
- SSO reporting.

While there are many other relevant components and findings within the WDR, the major components identified above represent most of the State Water Board's regulatory expectations for the implementation of the WDR. This regulatory audit is intended to provide an analysis of the current programs and practices within the City of Norwalk that address the above issues. This document will provide recommendations to ensure the development of appropriate SSMP programs and an appropriate time schedule necessary to comply with the WDR.

1.3 Prohibitions

Section C of the WDR identifies and prohibits SSOs that results in a discharge of untreated or partially treated wastewater to waters of the United States and/or creates a nuisance as defined in California Water Code (CWC) Section 13050(m) is prohibited. CWC section 13050, subdivision (m), defines nuisance as anything which meets **all** of the following requirements:

a) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
b) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
c) Occurs during, or as a result of, the treatment or disposal of wastes.

Since the State Water Board has not specifically defined SSOs that are subject to this prohibition and criteria for determining whether or not an SSO violates the above prohibition, the State and/or Regional Water Board will consider potential violations on a case-by-case basis. In general however, if an SSO results in a discharge to a surface water or drainage channel, the Water Board will consider this a discharge to Waters of the US. Additionally, if an SSO reaches an enclosed storm drainage pipe, and the SSO was not fully contained, captured, and pumped back into the sanitary sewer system, the Water Board will generally assume that the SSO reached a water of the US. In both cases the SSO will probably result in a violation of the WDR prohibition.

Determining whether an SSO created a nuisance is even more problematic and subjective. Again, since the State Water Board has not specifically defined SSOs that are subject to the nuisance

prohibition and criteria for determining whether or not an SSO is in violation of this prohibition, the State and/or Regional Water Board will consider violations on a case-by-case basis.

In both cases, while reporting SSOs, determining whether or not the SSO violated the prohibition is not up to the reporting Agency. It is the enforcement agency's responsibility to determine compliance with the WDR.

1.4 SSO Reporting

WDR finding number 9 states:

> Both uniform SSO reporting and a centralized statewide electronic database are needed to collect information to allow the State Water Board and Regional Water Quality Control Boards (Regional Water Boards) to effectively analyze the extent of SSOs statewide and their potential impacts on beneficial uses and public health. The monitoring and reporting program required by this Order and the attached Monitoring and Reporting Program No. 2006-0003-DWQ, are necessary to assure compliance with these waste discharge requirements (WDRs).

Furthermore, the State Water Board Fact Sheet states:

> SSOs can be distinguished between those that impact water quality and/or create a nuisance, and those that are indicators of collection system performance. Additionally, SSO liability is attributed to either private entities (homeowners, businesses, private communities, etc…) or public entities.
>
> Although all types of SSOs are important to track, the reporting time frames and the type of information that need to be conveyed differ. The Reporting Program and Online SSO Database clearly distinguish the type of spill (major or minor) and the type of entity that owns the portion of the collection system that experienced the SSO (public or private entity). The reason to require SSO reporting for SSOs that do not necessarily impact public health or the environment is because these types of SSOs are indicators of collection system performance and management program effectiveness, and may serve as a sign of larger and more serious problems that should be addressed. Although these types of spills are important and must be regulated by collection system owners, the information that should be tracked and the time required to get them into the online reporting system are not as stringent.
>
> Obviously, SSOs that are large in nature, affect public health, or affect the environment must be reported as soon as practicable and information associated with both the spill and efforts to mitigate the spill must be detailed. Since the Online SSO Database is a web based application requiring computer connection to the internet and is typically not as available as telephone communication would be, the Online Database will not replace emergency notification, which may be required by a Regional Water Board, Office of Emergency Services, or a County Health or Environmental Health Agency.

In order to implement the above vision, the State Water Board has developed a web based database that will be used to report all SSOs. This online spill reporting system is hosted,

controlled, and maintained by the State Water Board. The web address for this site is http://ciwqs.waterboards.ca.gov

This online database is maintained on a secure site and is controlled by unique usernames and passwords. Once the City has enrolled into the WDR, and has identified a Legally Responsible Official (LRO), the State Water Board will issue both a user name and password to the LRO and notify that individual of this information.

These accounts will allow controlled and secure entry into the SSO Database. Additionally, within thirty (30) days of receiving an account and prior to recording SSOs into the SSO Database, all Enrollees must complete the "Collection System Questionnaire", which collects pertinent information regarding an Enrollee's collection system. The "Collection System Questionnaire" must be updated at least every 12 months.

All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative. For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.

All reporting requirements are described within the Monitoring and Reporting Program (MRP) that was adopted by the State Water Board Order, along with the WDR. (See highlights of the newly revised MRP regulations below)

California Health and Safety Code section 5411.5, states that:

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

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

1. That person has knowledge of the discharge,
2. Notification is possible, and
3. Notification can be provided without substantially impeding cleanup or other emergency measures.

SECTION 2 SSO as Defined by the Revised MRP

An SSO is defined by the WDR as any overflow, spill, release, discharge, or diversion of untreated or partially treated wastewater from a sanitary sewer system, including:

Category 1 – Discharges of untreated or partially treated wastewater of any volume resulting from an enrollee's sanitary sewer system failure or flow condition that:

- Reach surface water and/or reach a drainage channel tributary to a surface water; or Reach a MS4 and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond).

Category 2 – Discharges of untreated or partially treated wastewater greater than or equal to 1,000 gallons resulting from an enrollee's sanitary sewer system failure or flow condition that does not reach a surface water, a drainage channel, or the MS4 unless the entire SSO volume discharged to the storm drain system is fully recovered and disposed of properly.

Category 3 – All other discharges of untreated or partially treated wastewater resulting from an enrollee's sanitary sewer system failure or flow condition.

SSOs may cause a public nuisance, particularly when raw wastewater is discharged to areas having high public exposure, such as streets or surface waters used for drinking, fishing, or body-contact recreation. SSOs may pollute surface or ground waters, threaten public health, adversely affect aquatic life, and impair the recreational use and aesthetic enjoyment of surface waters.

Agencies in California that own sanitary sewer systems and experience SSOs are required to enter the SSO information into California's Integrated Water Quality System (CIWQS) database—the SWRCB's information management system for regulatory and water quality data reporting. In addition, SWRCB requires that agencies notify the State Office of Emergency Services (OES) within 24 hours of any spill that exceeds 1,000 gallons.

In summary, the WDR is intended to:

- Provide a consistent and unified statewide approach for the reporting and database tracking of SSOs.
- Establish consistent and uniform requirements for SSMP development and implementation.
- Facilitate consistent enforcement of the WDR regulation and violations.

Capacity assurance is at the heart of the WDR. The SWRCB's WDR requires the preparation of SSMPs, while implementation of SSMPs is the responsibility of the nine Regional Water Quality Control Boards (RWQCBs). The SSMP consists of a set of documented plans to address how a wastewater collection system conducts business management, funding, design, operations, maintenance, and emergency response. The System Evaluation and Capacity Assurance Plan (SECAP) element of the SSMP includes evaluation of peak flows, design criteria, and capacity enhancement measures, and a schedule with planned completion dates of capital improvements.

Goals of City's SSMP are to:

1. Prevent sewer system overflows by:
    a. Providing adequate capacity in its system in accordance with its criteria, and schedule detailed in its System Evaluation and Capacity Assurance Plan
    b. Cost effectively minimizing the sources of inflow and infiltration
    c. Implementing its fats, oils, and grease (FOG) control program to minimize the entry of these substances into its collection system
    d. Inspecting its system, assessing its condition, and replacing and/or rehabilitating it as detailed and scheduled in its Operation and Maintenance Program
    e. Establishing and implementing an operation and maintenance program with adequately trained staff to not only prevent SSO's, but also to extend the useful life of its system
    f. Establishing proper legal authority for implementing the above
    g. Maintaining the necessary level of funding for providing proper operation, maintenance, and repair of its system as detailed in its Operation and Maintenance Program; and providing adequate capacity as detailed in its System Evaluation and Capacity Assurance Plan through periodic reviews of its rate structure.
2. Minimize the impact of SSO's that do occur by preparing a proper Overflow Emergency Response Plan, training its staff in its implementation, and implementing the plan when needed.

The SSMP prescribes specific milestones that relate to the specific elements required in the WDR:

1. Goals,
2. Organization,
3. Legal Authority,
4. Operations and Maintenance Program,
5. Design and Performance Provisions,
6. Overflow Emergency Response Plan,
7. Fats, Oil and Grease (FOG) Control Program,
8. System Evaluation and Capacity Assurance Plan (SECAP),
9. Monitoring, Management, and Plan Modifications,
10. SSMP Program Audits, and
11. Communication Program.

An SSMP program audit must be conducted at least every two years, and the audit report must be kept on file by the City staff. Successful implementation of an SSMP and compliance with the WDR could result in significant cost-savings to the City and its residents.

In compliance with the WDR Order, the City did file its application form with the SWRCB on October 30, 2006. As a result, the City received its Username and Password for accessing the California Integrated Water Quality System (CIWQS) database. Within the database reporting program, the City completed its "collection system questionnaire" and will file all subsequent updates and all required SSO reporting.

Additionally, this document has been prepared to meet the objectives contained in the WDR Order. The document is divided into 13 sections, which closely align with the respective provisions contained in the WDR. Every section or subsection of each chapter addresses one of the key elements of the SSMP directive.

This document, plus other existing agency programs referenced herein constitute the SSMP for the City of Norwalk. By implementing the procedures contained in this SSMP, the occurrence of SSO should decrease or possibly be avoided throughout the City's sanitary sewer collection system.

SECTION 3 - Goals

> **Section D.13(i) - Goal**: 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.

3.1 Overview

This section describes the goals of the Sewer System Management Plan (SSMP), which is to provide a documented plan that describes all collection system activities and programs employed by an agency to ensure proper management of all collection system assets. Implementing an SSMP will ensure proper management, operation, and maintenance of all parts of the sanitary sewer system, ultimately helping to reduce and prevent SSOs, as well as mitigate any SSOs that do occur including meeting all applicable regulatory notification and reporting requirements.

Commitment to continual improvement will also ensure that the SSMP is both a living and sustainable document that is continually updated, revised, and tailored towards the City's needs. The City is required to comply with the "State Water Resources Control Board (SWRCB), Order No. 2006-0030 DWQ" (Order) on General Waste Discharge Requirements for publicly owned sewage collection agencies having more than one mile of collection pipelines.

3.2 Purpose

This element describes the City's stated goals of the SSMP and is intended to clarify the City's desired level of service that it is providing to its customers. Typically, high level statements regarding the overall management of a system includes a vision and mission statement, as well as a statement of short and long term goals.

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

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

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

Minimum Requirements

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

1. Create/develop a management, operation and maintenance plan and schedule to reduce preventable SSOs.
2. Respond to and mitigate all SSOs discharging from the City's collection system.
3. Ensure adequate system capacity for the current and future needs of the City's service area.
4. Establish measurable performance indicators and manage assets at lowest life cycle costs.
5. Provide accurate reporting of all SSOs as described by the Order.
6. Properly fund, manage, operate, and maintain, with adequately trained staff and/or contractors.
7. All parties involved, shall possess adequate knowledge skills and abilities necessary to ensure the proper management, operation, and maintenance of all parts of the sewage collection system owned and/or operated by the City of Norwalk.

The State Water Board also expects both a plan and schedule to be created by the City to ensure that an SSMP is developed in accordance with the time schedule identified in the WDR and will facilitate proper sanitary sewer system management, operation, and maintenance.

The **goals** of this SSMP are:

1. Prevent sewer system overflows by:
    a. Providing adequate capacity in its system in accordance with its criteria, and schedule detailed in its System Evaluation and Capacity Assurance Plan
    b. Cost effectively minimizing the sources of inflow and infiltration
    c. Implementing its fats, oils, and grease (FOG) control program to minimize the entry of these substances into its collection system
    d. Inspecting its system, assessing its condition, and replacing and/or rehabilitating it as detailed and scheduled in its Operation and Maintenance Program
    e. Establishing and implementing an operation and maintenance program with adequately trained staff to not only prevent SSO's, but also to extend the useful life of its system
    f. Establishing proper legal authority for implementing the above
    g. Maintaining the necessary level of funding for providing proper operation, maintenance, and repair of its system as detailed in its Operation and Maintenance Program; and providing adequate capacity as detailed in its System Evaluation and Capacity Assurance Plan through periodic reviews of its rate structure.

2. Minimize the impact of SSO's that do occur by preparing a proper Overflow Emergency Response Plan, training its staff in its implementation, and implementing the plan when needed.

The **actions** to be taken under the SSMP are:

1. Developing a 5-year cycle for cleaning and CCTV inspection of the entire sewer system
2. More inspection resources for the FOG control program;
3. When SSO's do occur, respond to the reported site in a timely manner and undertake feasible remedial actions to contain overflow impacts, including stopping the flow from reaching the storm drain or water course, if possible; and,
4. Stop the overflow as soon as possible and limit public access into the overflow area to prevent public contact with any wastewater contamination; and,
5. Completely recover the overflow and return it to the sewer system, and clean up the contaminated area; and,
6. Gather and compile all pertinent information regarding the overflow event, investigate as necessary to determine probable cause, document findings, report to the appropriate regulatory agencies in a timely manner, and file the completed report; and,
7. Condition all development and capital projects to evaluate, design and construct sewer facilities to the city approved standards and criteria.

SECTION 4 - Organization

D.13 (ii) - **Organization**: The SSMP must identify:

(a) The name of the responsible or authorized representative as described in Section J of this Order.

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

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

4.1 Overview

This element of the WDR describes both the organizational structure of the City as well as activities, duties, and responsibilities for individuals and positions associated with the sanitary sewer system. This section should include typical positions and their associated activities, duties, and responsibilities.

4.2 Purpose

Clearly identifying specific roles and responsibilities within an organization will ensure an a clear understanding of duties that must be performed, as well as training and skill sets that are associated with specific jobs throughout the agency.

4.3 Minimum Requirements

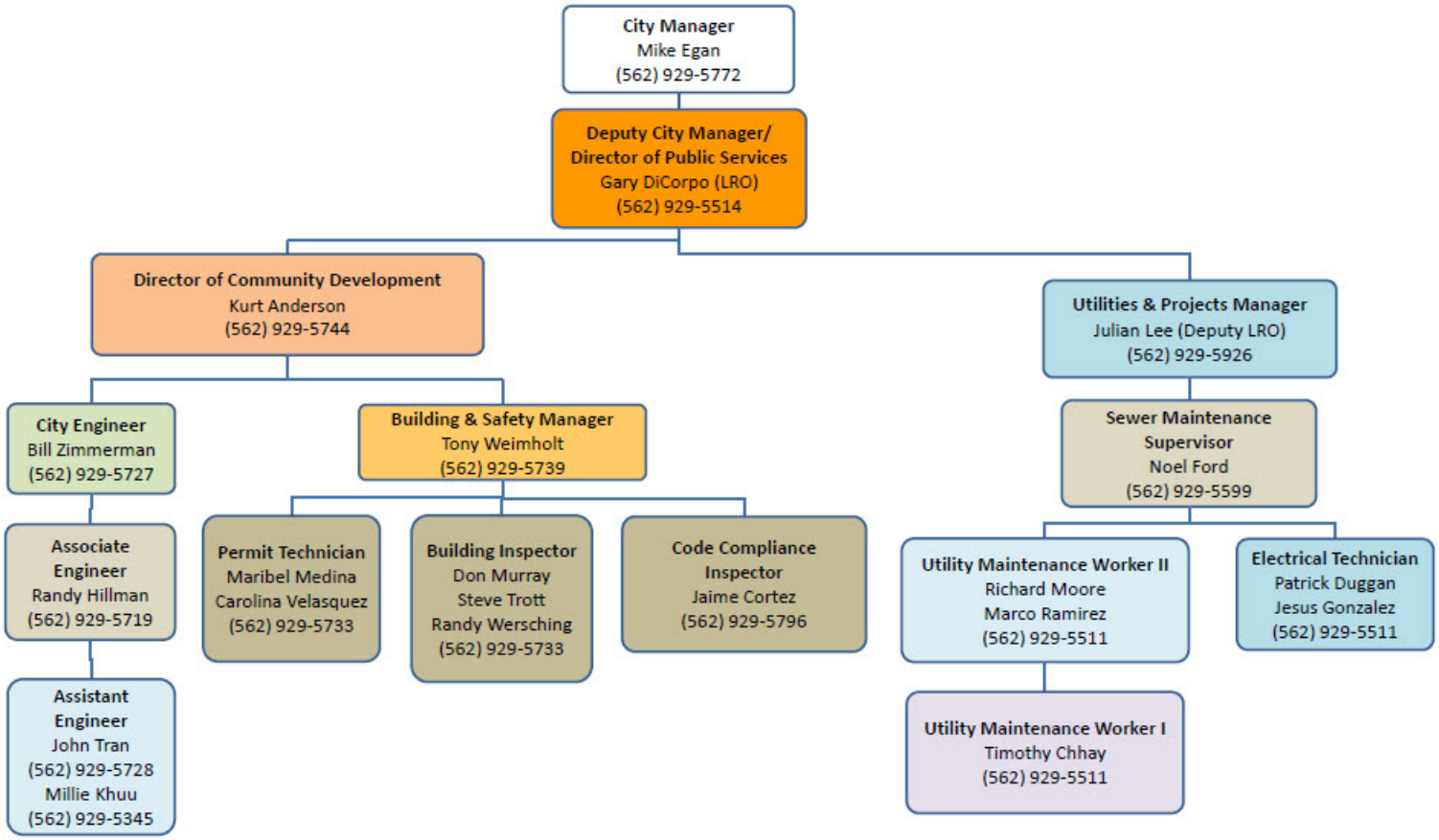
1. The name of the responsible or authorized representative as described in Section J of this Order.
2. The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority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

4.4 Compliance

The City's organizational chart is shown in the next exhibit. The City of Norwalk's Legally Responsible Official is the Director of Public Services (DPS). The City's Deputy LRO is the Utilities and Projects Manager (UPM). Specific responsibilities are described for each position following the organizational chart below.

2014 City Organization Chart

City of Norwalk
Statewide WDR SSMP Implementation

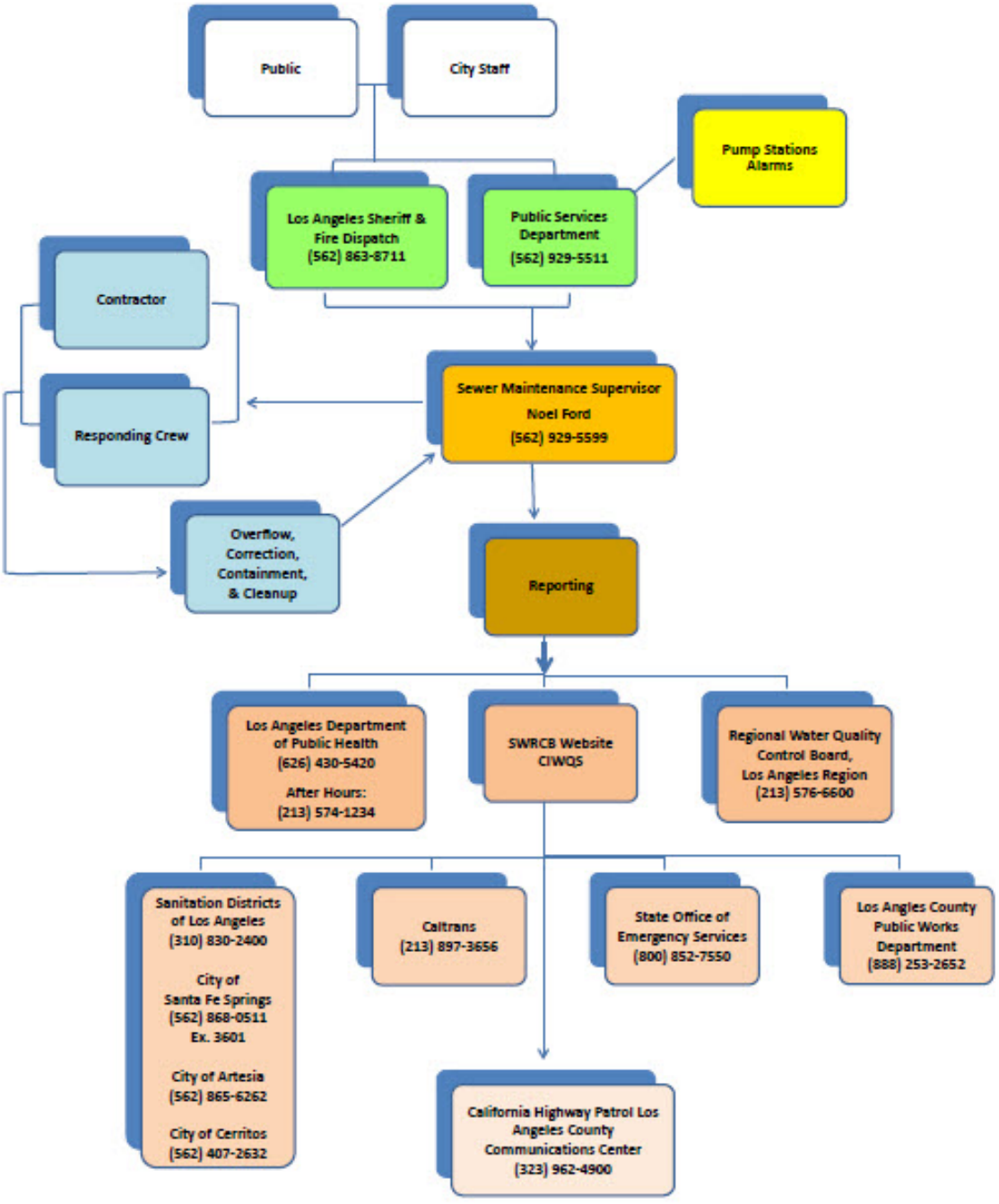


Communication Plan for SSMP Implementation

Position	*City Council Members*
Responsibilities	*Develop and adopt policies* *Certify SSMP*
Position	*City Manager*
Responsibilities	*Ensure policies are appropriate* *Ensure policies can be implemented Ensure regulatory compliance*
Position	*Director of Public Services*
Responsibilities	*Direct implementation and upgrades of policies* *Allocate funding for resources* *Approve CIP contracts* *Approve additional resources* *Manage policy implementation* *Manage SSMP implementation* *Monitor SSMP implementation and effectiveness*
Position	*Utilities & Projects Manager*
Responsibilities	*Initiate SSMP updates* *Implement SSMP* *Measure SSMP effectiveness* *Oversee field operations* *Communicate SSMP effectiveness to DPS* *Ensure adequate resources are available for policy and SSMP activities* *Provide updates on policy and SSMP effectiveness*
Position	*Sewer Maintenance Supervisor*
Responsibilities	*Monitor SSMP plans and procedures* *Facilitate field operations* *Assess SSMP plans and procedures* *Solicit & provide feedback on effectiveness of plans* *Coordinate and schedule field activities* *Communicate SSMP effectiveness to UPM* *Recommend improvements to SSMP procedures*
Position	*Building & Safety Manager*
Responsibilities	*Implement FOG program* *Monitor FOG program*
Position	*Utility Maintenance Workers*
Responsibilities	*Perform daily activities* *Execute plans and procedures* *Provide feedback on effectiveness of plans*

The City of Norwalk has developed and implemented a chain of communication or protocol for who receives initial notification of collection system issues, transmits that information to field crews, or who are responsible for notifying and implementing reporting procedures as shown in the exhibit below.

City of Norwalk
Statewide WDR - SSMP
Sanitary Sewer Overflow Reporting



SECTION 5 - Legal Authority

D.13 (iii) **Legal Authority:** Each Enrollee must demonstrate, through sanitary sewer 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 may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);
(b) Require that sewers and connections be properly designed and constructed;
(c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
(d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and
(e) Enforce any violation of its sewer ordinances

5.1 Overview

This chapter is intended to identify and describe the necessary legal authority that an agency must have in order to implement SSMP plans, programs, and procedures. Regulatory mechanisms that are used by cities quite often include City Ordinances, Codes, and Resolutions, State and Federal Laws, Licensing and Permitting Processes, Memorandum of Agreements, Contractual Agreements, as well as other programmatic mechanisms necessary to carry out asset management activities.

5.2 Purpose

The basis of all authority to manage, operate, and maintain agency's infrastructure is derived from documents adopted by its elected board or council. In order to ensure that the City has the proper legal authority established to implement and enforce all of the programs required by the WDR, the City must first establish necessary legal authority to do so.

5.3 Minimum Requirements

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

a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);

b) Require that sewers and connections be properly designed and constructed;

c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;

d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and

e) Enforce any violation of its sewer ordinances.

5.4 Compliance

The City has established legal authority by:

- Adopting the Los Angeles County Code, Division 2 of Title 20, Sanitary Sewer and Industrial Waste Ordinance. Title 20 references Title 28 which includes the adoption of the 2007 California Plumbing Code.
- Adopting the City of Norwalk Municipal Code Title 13 Public Services Chapter 12
- Developing its Standard Drawings for Construction of Sanitary Sewers
- Developing Design Standards for Sewer Facilities
- Adopting a Fats, Oil and Grease Program

SECTION 6 - Operation and Maintenance Program

D.13 (iv) **Operation and Maintenance Program:** The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:

(a) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities;

(b) Describe routine preventative operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;

(c) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;

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

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

6.1 Overview

This section of the SSMP describes how the City will operate and maintain the sanitary sewer system within its jurisdiction. It will involve the development and implementation of several major programs and activities including the production of maps, maintenance and cleaning schedules, and a comprehensive rehabilitation and replacement plan.

6.2 Purpose

Thorough assessment of the present condition of the sanitary sewer system, deficiencies and defects within the system can be identified so that these issues can be targeted and prioritized for rehabilitation. This program of preventative maintenance will help to ensure that costly catastrophic system failures are preempted and will serve to reduce the amount of SSOs to be reported within the City.

6.3 Minimum Requirements

At a minimum, each enrollee must:

1) Create and maintain an up-to-date map of the sanitary sewer system within an Enrollee's jurisdiction;
2) Develop and implement a Preventative Maintenance program that describes preventative operation and maintenance activities and a system to document scheduled and conducted activities;
3) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and rehabilitation actions, including regular inspections of the conditions within the system.
4) Provide regular training for staff and contractors
5) Provide equipment and replacement part inventories.

6.4 Compliance

(a) The City will be developing a GIS map of its sanitary sewer system, showing all sewer facilities as part of its current Sewer Master Plan. It will be included in the Operation and Maintenance Program document as well as the Overflow Emergency Response Plan.

(b) The City performs routine operation and maintenance activities in order to provide a high level of service to its customers, extend the useful life of its assets, and prevent overflows. These activities are described in the Operation and Maintenance Program document and include a cleaning program, a CCTV inspection program, pump station maintenance, equipment maintenance, and repair and replacement. The City's entire sewer collection lines are cleaned every two years and frequent maintenance areas are cleaned once every 180 days or twice per year. Pump stations are inspected twice weekly.

(c) The City has completed CCTV inspection of approximately 75 percent of its gravity system. The condition of the inspected system was evaluated to identify the structural deficiencies, as well as operation and maintenance deficiencies. The structural

deficiencies have been prioritized and a structural replacement and rehabilitation program will be developed on an on-going basis.

The City adopted a sewer fund and rate structure in 2014 so that sufficient revenues can be generated for proper operation and maintenance of the collection system, and funding of the capital improvement projects recommended by the Capacity Assurance Plan and the Operation and Maintenance Program. Funds will also support the continuation of the CCTV inspection plan. The City plans to complete the inspection of the entire sewer system within the next 10 years.

(d) Currently, the City maintenance staff receives on the job training that includes training for safety, lockout-tag out, traffic control, confined space entry, and driver safety. In the future, the City intends to supplement this training with the California Water Environment Association's (CWEA) training program.

The City will require contract staff and contractor staff who will perform flow monitoring, CCTV inspection, maintenance, repair, or replacement on the collection system, including the pump stations and force mains, to possess adequate level of training and certifications appropriate for their duties.

(e) The City has an up-to-date equipment and replacement parts inventory list included in the Operation and Maintenance Program document.

SECTION 7 - Design and Performance Provisions

D.13 (v) **Design and Performance Provisions:** :

(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 resting the installation of new sewers, pumps and other appurtenances and for rehabilitation and repair projects.

7.1 Overview

Development of standards for the design, construction, inspection, testing and acceptance of new, rehabilitated, or repaired portions for the collection system is key in ensuring a safe, and reliable collection system. Even if the City has existing standards in place a comprehensive review of these is required to establish meeting the SSMP criterion.

7.2 Purpose

This requirement will create continuity within the system, preventing inconsistencies from leading to hydraulic deficiencies which can result in a sanitary sewer overflow.

7.3 Minimum Requirements

At a minimum, each enrollee must:

1) Develop and implement consistent design and construction standards 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
2) Develop and implement procedures and standards for inspecting and resting the installation of new sewers, pumps and other appurtenances and for rehabilitation and repair projects.

7.4 Compliance

(a) The City has adopted:

- Sewer Standard Plans
- Standard Plans (Sewer) for Public Works Construction (latest edition)
- The Los Angeles County Code, Division 2 of Title 20, Sanitary Sewer and Industrial Waste Ordinance. Title 20 references Title 28 which includes the adoption of the 2007 California Plumbing Code.
- Los Angeles County Sanitation District Standard Drawings

The City has also developed its own Design Standards for Sewer Facilities document.

(b) The City has adopted:

- The Los Angeles County Code, Division 2 of Title 20, Sanitary Sewer and Industrial Waste Ordinance. Title 20 references Title 28 which includes the adoption of the 2007 California Plumbing Code.

The City has also developed its own Design Standards for Sewer Facilities document.

Project specific plans and technical specifications are required for each project, which are prepared by California Registered Civil Engineers. Testing and inspection requirements are detailed in the project specifications, in addition to the City's Design Standards for Sewer Facilities.

SECTION 8 - Overflow and Emergency Response Plan

D. 13 (vi) Overflow Emergency Response Plan - Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

(a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;

(b) A program to ensure an appropriate response to all overflows;

(c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification;

(d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;

(e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and

(f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

8.1 Overview

This element of the SSMP consists of both the contingency plan and the procedures for responding to an overflow event.

8.2 Purpose

Proper procedures must be established and put into practice in order to minimize the negative effects of an SSO. This section requires the implementation of a concise set of procedures that will seek to ensure that all negative effects of an SSO on public health and the environment are minimized. Proper overflow response procedures are one of the main reasons for the development of the WDRs for SSOs.

8.3 Minimum Requirements

At a minimum, each enrollee must include in its overflow emergency response plan:

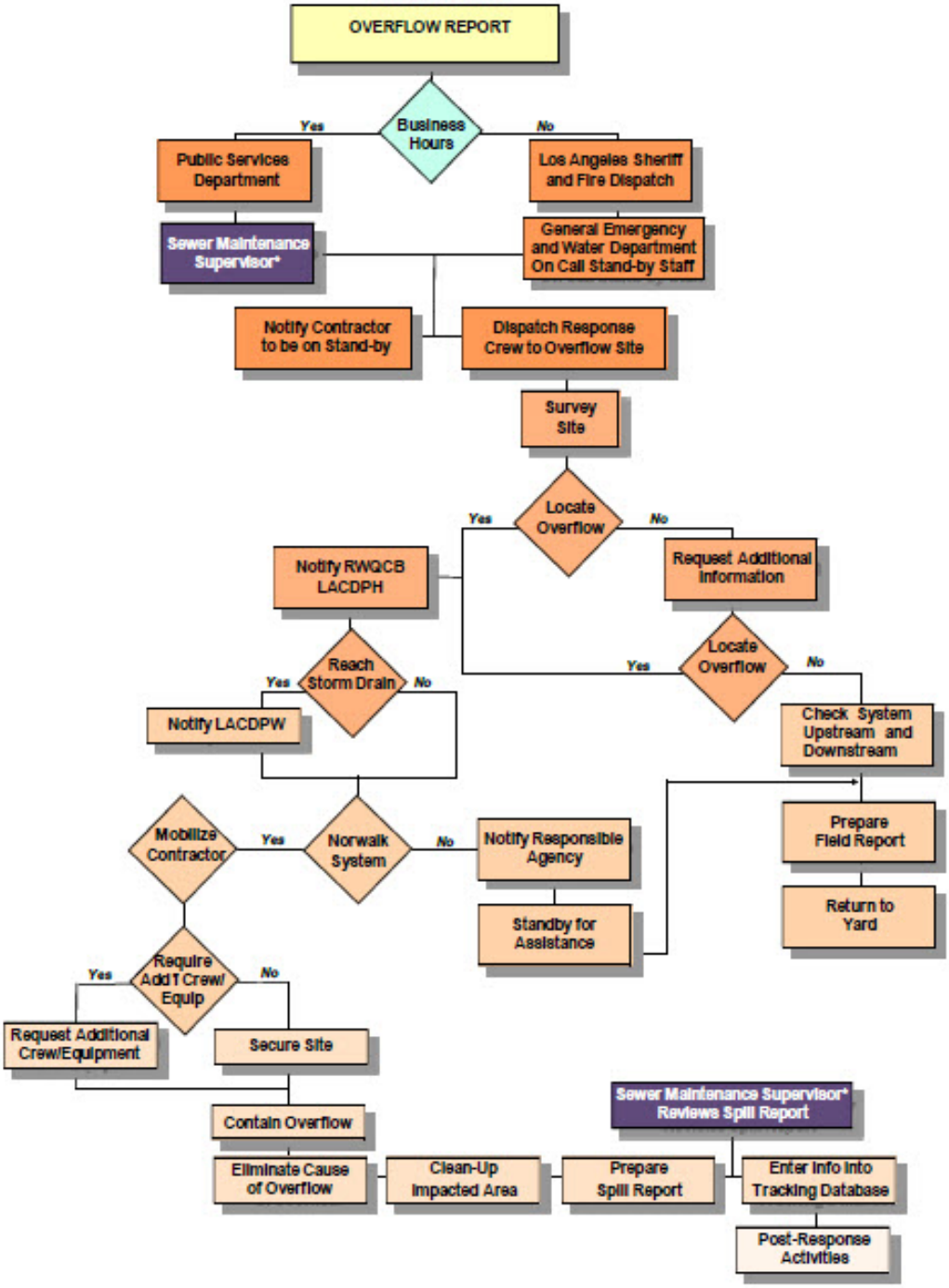
1) Proper notification procedures for primary responders and regulatory agencies;
2) A program to ensure appropriate response to all overflows;
3) Procedures to ensure prompt notification of appropriate officials or other potentially affected agencies for reporting purposes;
4) Procedures to ensure that all appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are properly trained;
5) Procedures to address emergency operations
6) A program to ensure all steps are taken to contain untreated wastewater and prevent discharge of untreated wastewater to waters of the United States.

8.4 Compliance

The City of Norwalk does have a Sewer Overflow Response Plan which was developed in 2009. This plan will be updated in view of changes to the WDR regulations since then. The current flow chart is shown in the exhibit below.

Staff training in the established procedures will be conducted at least once per year.

CITY OF NORWALK
Sanitary Sewer Overflow Emergency Response Plan
Flow Chart



*Sewer Maintenance Supervisor, Noel Ford - (562) 929-5599

SECTION 9 - FOG Control

D. 13 (vii) FOG Control Program - 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. The plan shall include the following as appropriate:

(a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;

(b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;

(c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;

(d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;

(e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;

(f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and

(g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

9.1 Overview

Under the Order, the City is required to evaluate its service area to determine whether a Fats, Oils, and Grease (FOG) control program is needed. If the City determines that a FOG program is not needed, it must provide justification for why it is not needed. If FOG is found to be a problem, the City must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system.

9.2 Purpose

FOG is generated in most types of restaurants and food service establishments during food preparation, food service, and kitchen clean up. If flushed down the drain, FOG can build up in pipes, pumps, and equipment -- causing significant problems in the sanitary sewer system, including line blockages. Blockages can lead to sewer overflows, posing environmental and public health hazards. Understanding and controlling discharges of FOG will greatly reduce potential liability of SSOs and efforts required to keep lines clean. The key to reducing FOG in the sanitary sewer system includes both a good source control program, as well as preventative maintenance to ensure FOG that does build up within the system is cleaned before significant buildup can occur. Additionally, understanding your collection system and the type of discharges within the service area is paramount to the strategic implementation of a FOG program.

9.3 Minimum Requirements

At a minimum, each enrollee must:

1) Determine if FOG is (or could be) an issue within the service area. (If FOG is found not to be an issue, then justification must be provided).
2) Create a plan and schedule for a public education outreach program that promotes proper disposal of FOG;
3) Develop 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;
4) Ensure that the appropriate legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
5) Require the installation of grease removal devices (such as traps or interceptors), including design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
6) Make sure that the agency has the authority to inspect grease producing facilities, enforcement authorities, and whether the agency has sufficient staff to inspect and enforce the FOG ordinance;
7) Identify sections of the sanitary sewer system that are subject to FOG blockages and establish a cleaning maintenance schedule for each section; and
8) Develop and implement a source control and/or cleaning program for all sources of FOG discharged to the sanitary sewer system.

9.4 Compliance

The City of Norwalk has a FOG control and prevention program in place. Typically, data is provided that can prove or disprove the presence of a FOG issue.

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."

According to the same document, 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.

Additionally, information on proper disposal of FOG and other SSO prevention measures, including installation of backwater valves, house lateral maintenance, etc. disseminated through brochures, articles in the City newsletter, and individual notices to property owners should be utilized. Expanded use of the City's home web page, use of radio and television announcements and other aggressive means should also be explored.

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 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 FOG 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.

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.

SECTION 10 - System Evaluation and Capacity Assurance

D. 13 (viii) System Evaluation and Capacity Assurance Plan: 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 an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;

(b) **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and

(c) **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.

(d) **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14.

10.1 Overview

This element of the SSMP includes several major programs and activities regarding development of a capital improvement plan and hydraulic analysis. Most of the requirements would be satisfied by a recent collection system master plan.

10.2 Purpose

An important step in attempting to minimize the amount of SSOs in a given system, one must determine how the system will react to different conditions and stresses. Once this is achieved, City officials can identify areas in need of improvement and prioritize projects for a capital improvement program.

10.3 Minimum Requirements

At a minimum, each enrollee must:

1) Describe the methods used to identify areas of the sanitary sewer system that lack the sufficient capacity to convey an appropriate peak flow;
2) Establish consistent design criteria;
3) The identification of capacity needs and the approach used to take the results of the capacity evaluation to produce a prioritized list of capacity improvement projects; and
4) The development of a project schedule that addresses both condition-related and capacity-related projects.

10.4 Compliance

The City has hired an outside consultant who is in the process of updating its 2009 Sewer Master Plan. This report will be completed in first quarter of 2015.

The City has adopted a CIP that is based on the 2009 sanitary sewer master plan and has embarked on implementing some of the recommended elements of CIP from this report. The City will adopt the updated 2015 CIP resulting from the current Sewer Master Plan and move forward with its implementation.

SECTION 11 - Monitoring, Measurement, and Program Modification

D.13 (ix) Monitoring, Measurement, and Program Modifications: The Enrollee shall:

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

11.1 Overview

It is critical that the City monitors implementation of the SSMP elements, and measures the effectiveness of SSMP elements in reducing SSOs. Effectiveness should be measured by developing and tracking performance indicators on a regular basis. Performance indicators should be selected to meet the goals of the wastewater collection system agency.

11.2 Purpose

In order to effectively manage programs, performance measures that gauge success should be developed and data to support the findings must be collected. To this end, accurate and consistent data keeping is extremely important for successful sewer system management. It is imperative that the correct data is captured, in a format that is easily extractable, and that operations personnel understand their role in this process. Focus should be placed on performance metrics, components of trend tracking, and bench-marking procedures both internally and externally. Based upon data collected decisions can be made as to changes that may be warranted and needed in order to maximize program efficiencies. Setting up a Monitoring, Measurement, and Program Modification program will allow a community to better manage and implement SSMP programs.

11.3 Minimum Requirements

At a minimum, the enrollee must:

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

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

c. Assess the success of the preventative maintenance program;

d. Update program elements, as appropriate, based on monitoring or performance evaluations; and

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

11.4 Compliance

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 tri-annual cleaning schedule of system, as well as address hotspot cleaning as needed.

Additionally, the City has established the preventive maintenance sewer metrics that are shown in table below for use in monitoring, measuring and adjusting sewer maintenance activities. After these metrics are included in the City's work order system, they will be monitored on a regular basis. Until this time, City staff will compile and monitor the most relevant indicators, which include the number and causes of SSOs, length of pipes cleaned, length of pipes televised and length of pipes repaired.

Success Factors and Metrics

Sewer Maintenance Success Factors	Metric
System Pipes	Miles
Sewer Maintenance Field Staff	Full Time Equivalents (FTE)
Pipes Cleaned	Miles/Year
Pipes Inspected (CCTV)	Miles/Year
Manholes Inspected	Number/Year
Hot Spots Cleaned	Number by Underlying Cause (Roots, Debris, FOG, Structural)
SSOs	Number by Underlying Cause per 100 Miles
Repeat SSOs	Number by Address
Response Time	Minutes per SSO
FSE Inspections	Number/Year
Pipe Replaced	Miles/Year

SECTION 12 - Program Audit Procedures

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

12.1 Overview

Audit programs are intended to provide controls for ensuring that all programs associated with the SSMP are being implemented as planned and managed appropriately. Audit outcomes should provide information about challenges and successes in implementing the SSMP by evaluating work practices and operations, documentation, procedures records and staff for implementation effectiveness and consistency. The audit will identify any program or policy changes that may be needed to continually improve effective implementation. Information collected as part of an audit should be used in to plan program or procedure revisions necessary to improve program performance.

12.2 Purpose

SSMP audit program development should be developed specifically for the sanitary sewer system, but agency-wide procedures should be incorporated to ensure program sustainability. The audit can contain information about successes in implementing the most recent version of the SSMP, and identify revisions that may be needed for a more effective program. Information collected as part of the Monitoring, Measurement, and Program Modifications program should be used in preparing the audit. Quite often, performance measures and other management indicators are developed, providing a baseline that performance can be measured against. Tables, figures, and charts can be used to summarize information about these indicators. An explanation of the SSMP development and accomplishments in improving the sewer system should be included in the audit, including:

- Progress made on development of SSMP elements, and if the sewer system agency is on schedule in developing all elements of the SSMP;
- SSMP implementation efforts over the timeframe in question;
- The effectiveness of implementing SSMP elements;
- A description of the additions and improvements made to the sanitary sewer collection system in the past reporting year; and
- A description of the additions and improvements planned for the upcoming reporting year with an estimated schedule for implementation.

12.3 Minimum Requirements

The WDR requires that all agencies develop appropriate audit procedures necessary to evaluate the effectiveness of the SSMP, as well as the agency's compliance with all requirements identified in the WDR. The audit must identify any deficiencies in an agency's SSMP programs and include

steps to correct these issues. At a minimum, audits must be conducted every two years and a report of the findings must be prepared and kept on file.

12.4 Compliance

The City has been performing its bi-annual audit in both 2011 and 2013. The 2011 audit did identify some of the elements that still need to be implemented, however, not all of these elements were addressed by the time 2013 audit was done and they were carried forward.

For the 2014 Audit, the City hired an outside consultant to conduct a comprehensive audit and gap analysis. The results and recommendations of this audit were used to update the SSMP document. All audits including the 2014 audit and gap analysis will be kept on file in the Office of the City Clerk, the DPS office and at the field maintenance yard.

12.5 SSMP Certification

The SSMP will be presented to the City Council. Subsequent SSMP approval must also be considered and acted upon at a public meeting. Once it is approved, the Director of Public Services must certify its approval in compliance with the WDR requirements, including completion of the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form and sending the signed form to:

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

12.6 SSMP Modification and Re-certification

The SSMP must be updated every five years to keep it current. When significant amendments are made to any portion or portions of the SSMP, it must be noticed and resubmitted to the City Council for approval and re-certification. The re-certification shall be in accordance with the certification process described in section 12.2 above.

SECTION 13 - Communication Program

(xi) **Communication Program** – The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented. The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

13.1 Overview

Communication programs are often underrated and overlooked. However, an effective communication program may end up being the key element that keeps your organization from missing critical SSMP deadlines. Involving the public early and at appropriate times will help your organization avoid last minute comments that delay approval of your SSMP by your governing body. A quality communication program with satellite agencies will help to minimize negative operational impacts on your plant or collection system.

It is important to identify an individual who will be responsible for development of your communication program. Larger agencies will typically have Communications and Media Officers or Public Information Officers who are appropriate to lead the development of the communication program. Smaller agencies who don't have these staff in-house should look to those within the agency who have exhibited strong writing skills, public speaking skills, experience with customer interface, or have successfully completed controversial projects. A self-assessment and rough timeline follow to help you on your way to a successful communication program!

13.2 Purpose

Identifying key stakeholders and key issues, and thinking about how various stakeholders might react is the first step to developing a communication plan. Understanding what elements of an SSMP they will be most concerned with, is one of the many potential considerations that an agency may identify. Involving the right stakeholders on potentially controversial issues as early as possible is important to the success of any new program. Emphasizing collaboration and shared goals to reach a workable solution will not always ensure buy off, but will promote ownership and understanding. These issues should be considered when developing a communication program

13.3 Minimum Requirements

a) 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.

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

13.4 Compliance

The City will provide all stakeholders and interested parties, the general public and other agencies, with status updates on the development and implementation of the SSMP and consider comments received from them. The City will utilize media such as quarterly newsletter, billing insert, special brochures, annual reports, notices in newspapers, and the City's home web page for conveying this information. Additionally, the City will:

- Identify an individual within your organization who is responsible for development, implementation, and interface for the communication program.
- Identify resources necessary to solicit and incorporate input on each phase of your SSMP (development, implementation, and performance), as well as document your outreach efforts.
- Identify key community stakeholders and key issues that various stakeholders may be interested in and/or concerned with.
- Make sure to involve the right stakeholders on potentially controversial issues as early as possible. Emphasize collaboration and shared goals to reach a workable solution.
- Create a list of key milestones in each phase of your SSMP when stakeholder input would be most useful and effective.
- Create a convenient mechanism for stakeholder input. Additionally, key considerations, while developing a communication program include:
- Consider the development of a variety of communication methods, including newsletters, public meetings, web pages, and public service announcements. Different agencies will find that different communication methods are effective. Look for a method that reaches the desired audience at a reasonable cost.
- Consider joint efforts to develop a website with other agencies or professional organizations and share costs. The website could contain general information about the new Water Discharge Requirements and SSMP components provide space to make documents available for public review, and contain contact, meeting times and locations, and other agency-specific information.
- For communication with other satellite agencies, consider regular coordination meetings, annual surveys for changes in their system, and/or web pages devoted to satellite agency issues.
- Make sure you have identified a staff person responsible for satellite agency coordination. This person will ensure that the program is sustained, and your agency's efforts to get the program up and running aren't wasted once the SSMP is complete.

13.5 SSMP Availability

Copies of the SSMP will be maintained in the City offices of the Library, City Clerk, the City Engineer and the Director of Public Services and at each maintenance field yard sites, with applicable summaries, reports and notices posted on the City's home web page. The adopted document shall also be made readily available to the Regional Water Quality Control Board (Region No. 4) representatives upon request and to the operators of any collection system or treatment facility downstream of the City's sanitary sewer system.