

Veronica Cazares, PE
General Manager
Selma Kingsburg Fowler County Sanitation District
11301 E. Conejo Avenue
Kingsburg, CA 93631

SUBJECT: Sewer System Management Plan Audit for the 3-Year Audit Period Ending August 2, 2024

Dear Ms. Cazares:

This letter summarizes the audit that Black & Veatch (BV) and Dopudja & Wells Consulting (Dopudja & Wells) conducted of the Selma-Kingsburg -Fowler County Sanitation District's (District's) Sanitary Sewer Management Plan (SSMP) for compliance with the Statewide Waste Discharge Requirements General Order WQ 2022-0103-DWQ (General Order) that superseded the previous General Order 2006-003-DWQ and the subsequent amendments.

This objective audit of the current SSMP is intended to meet the requirements of the General Order including Specifications 5.4, documenting:

- An evaluation of the previous audit to ensure deficiencies have been rectified.
- Identified compliance gaps/deficiencies in adhering to the requirements of the reissued General Order for all elements and sub-elements, including resilience.
- Identified implementation gaps/deficiencies in performing as described in the current SSMP.
- Identified effectiveness gaps/deficiencies for all elements (and in some cases the sub-elements) using key performance indicators in preventing spills and discharges to waters of the State.
- Specific short and long-term corrective actions or enhancements needed to rectify each gap/deficiency and a schedule for each action.

1.0 Introduction

The reissued General Order includes changes and additional requirements for a District to comply with federal and state prohibitions of discharge of sewage to waters of the State; comply with specifications, notification, monitoring, reporting and recordkeeping requirements; proactively operate and maintain resilient sanitary sewer systems to prevent spills, eliminate discharges of sewage to waters of the State through effective implementation of an SSMP; monitor, track, and analyze spills for ongoing system-specific performance improvements; and report noncompliance with the reissued General Order per reporting requirements.

The District's SSMP was last updated in May 2014 and the Spill Emergency Response Plan (SERP) was updated in June 2023.

2.0 Key Regulatory Drivers

While considering that the District's collection system is relatively small with average complexities, we recommend that the District focus their regulatory compliance efforts on 1) meeting the requirements of the General Order, and 2) avoiding enforcement actions – both of which are highlighted in the following sections.

2.1 SSMP Audit Requirements

The key requirements for SSMP Audits are described in Section 5.4 of the General Order as:

5.4. Sewer System Management Plan Audits

*The Enrollee shall conduct an internal audit of its Sewer System Management Plan, and implementation of its Plan, at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the Enrollee's last required audit period. **Within six months after the end of the required 3-year audit period**, the Legally Responsible Official shall submit an audit report into the online CIWQS Sanitary Sewer System Database per the requirements in section 3.10 (Sewer System Management Plan Audit Reporting Requirements) of Attachment E1 of this General Order.*

Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff.

The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills. The Enrollee's sewer system operators must be involved in completing the audit. At minimum, the audit must:

- *Evaluate the implementation and effectiveness of the Enrollee's Sewer System Management Plan in preventing spills;*
- *Evaluate the Enrollee's compliance with this General Order;*
- *Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and*
- *Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.*

The Enrollee shall submit a complete audit report that includes:

- *Audit findings and recommended corrective actions;*
- *A statement that sewer system operators' input on the audit findings has been considered; and*
- *A proposed schedule for the Enrollee to address the identified deficiencies.*

SSMP Audit reporting and recordkeeping requirements are described in General Order Attachment E1, Section 3.10., which states:

3.10. Sewer System Management Plan Audit Reporting Requirements

The Enrollee shall submit its Sewer System Management Plan Audit and other pertinent audit information, in accordance with section 5.4 (Sewer System Management Plan Audits) of this General Order, to the online CIWQS Sanitary Sewer System Database by six (6) months after the end of the 3-year audit period.

If a Sewer System Management Plan Audit is not conducted as required: the Enrollee shall:

- *Update the online CIWQS Sanitary Sewer System Database and select the justification for not conducting the Audit; and*

- *Notify its corresponding Regional Water Board (see Attachment F (Regional Water Quality Control Board Contact Information)) of the justification for the lapsed requirements.*

The Enrollee’s reporting of a justification for not conducting a timely Audit does not justify non-compliance with this General Order. The Enrollee shall:

- *Submit the late Audit as required in this General Order; and*
- *Comply with subsequent Audit requirements and due dates corresponding with the original audit cycle.*

The State Water Board transitioned SSMP Update and Audit due dates to align with the changes in the Reissued General Order, and lists them on the State Water Board website here:

https://www.waterboards.ca.gov/water_issues/programs/ss0/lookup/. The District’s due dates are shown in the table below.

Sewer System Management Plan & Subsequent Update Due Dates					
System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
Selma-Kingsburg-Fowler CS	5SSO11466	8/2/2009	8/2/2014	8/2/2019	8/2/2025

Audit Due Dates								
System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
Selma-Kingsburg-Fowler CS	5SSO11466	8/2/2011	8/2/2013	8/2/2015	8/2/2017	8/2/2019	8/2/2021	8/2/2024

* Per Section 5.5 and Attachment E1, Section 3.11 of the General Order, Plan updates are due within six years after the required due date of the Enrollee’s last Plan Update.

** Per Section 5.4 and Attachment E1, Section 3.10 of the General Order, the Audit Report is due within six months after the end of the required 3-year audit period.

A compliance checklist is included in Attachment A of this letter, which summarizes near-term deadlines including:

DUE DATE	ACTION ITEMS
End of 3-Year Audit Period: AUG 2, 2024	SSMP 3-Year Audit (initiate audit/draft report)
Due FEB 2, 2025	SSMP 3-Year Audit (final report/certify/upload by LRO)
No hard deadline. Initiate upon completion of SSMP Audit Report.	2025 SSMP Update (initiate review/draft new SSMP)
Due AUG 2, 2025	2025 SSMP Update (final report/certify/upload by LRO)

2.2 SSMP Requirements

The following table summarizes the General Order reference location for detailed requirements for each element of the SSMP, along with a summary of key changes in the reissued General Order in 2022.

COMPONENT	GENERAL ORDER REFERENCE SECTION	KEY GENERAL ORDER CHANGES IN 2022 ¹
Element 1: Goal & Introduction	<ul style="list-style-type: none"> • Attachment D.1 • Spec. 5.2 	<ul style="list-style-type: none"> • Implementation of SSMP as “living document.” • Enforcement of development, update, and implementation. • Narratives for regulatory context, assets, updated sewer map(s).
Element 2: Organization	<ul style="list-style-type: none"> • Attachment D.2 • Spec. 5.1 	<ul style="list-style-type: none"> • Name of Legally Responsible Official. • Enhanced details on LRO training and experience requirements.
Element 3: Legal Authority	<ul style="list-style-type: none"> • Attachment D.3 	<ul style="list-style-type: none"> • Collaboration with storm drain agencies; easement accessibility agreements.
Element 4: Operations and Maintenance Program	<ul style="list-style-type: none"> • Attachment D.4 • Spec. 5.7 • Spec. 5.19 	<ul style="list-style-type: none"> • Procedures for maintaining/providing Water Board access to sewer map(s) • Enhanced training/General Order, drills/skilled vol. est., CIWQS reporting; scheduling system in place.
Element 5: Design and Performance Provisions	<ul style="list-style-type: none"> • Attachment D.5 	<ul style="list-style-type: none"> • Few changes.
Element 6: Spill Emergency Response Plan	<ul style="list-style-type: none"> • Attachment D.6 • Spec. 5.12 • Attachment E-1 	<ul style="list-style-type: none"> • Numerous upgrades to notification, monitoring, reporting, record keeping, definitions. • Staff/contractor requirements for implementation, removing/cleaning sewage from drainage conveyance systems not impacting beneficial uses/receiving waters. • Coordination/collaboration with storm drain agencies (prior, during, after) spills. • Post-spill assessments, annual assessment, implement containment tech/practices. • Requires annual certification in Annual Report that SERP is up-to-date.
Element 7: Sewer Pipe Blockage Control Program	<ul style="list-style-type: none"> • Attachment D.7 	<ul style="list-style-type: none"> • Plan/schedule for pipe-blocking substances. • Commercial controls/authority to inspect, “hot spot” program, source controls.
Element 8: System Evaluation, Capacity Assurance, Capital Improvements	<ul style="list-style-type: none"> • Attachment D.8 • Spec. 5.6 • Spec.5.10 	<ul style="list-style-type: none"> • Implementation of capital improvements. • Identify/justify and prioritize specific system areas (high env. consequences/areas, new surface waters, steep terrain, high groundwater, near surface waters), exfiltration, recordkeeping enhancements, assets vulnerable to climate impacts. • More information for capacity assessments, inspections, audits. • Capacity of flood-prone systems subject to inflow/infiltration. • Increases in erosive forces, pumping redundancy, prioritization of corrective actions. • Enhanced coordination (operations/maintenance/engineering, other utilities).
Element 9: Monitoring, Measurement,	<ul style="list-style-type: none"> • Attachment D.9 • Spec. 5.11 	<ul style="list-style-type: none"> • Adaptive management/implementation effectiveness (Key Performance Indicators). • Update procedures/activities based on monitoring/performance evaluations.

¹ Source: BACWA Guide for Developing and Updating of SSMPs, July 2024

COMPONENT	GENERAL ORDER REFERENCE SECTION	KEY GENERAL ORDER CHANGES IN 2022 ¹
Program Modifications		
Element 10: Internal Audits	<ul style="list-style-type: none"> Attachment D.10 	<ul style="list-style-type: none"> Completed every 3 years (vs. every 2 years), input from operators, and cert/upload/LRO.
Element 11: Communication	<ul style="list-style-type: none"> Attachment D.11 	<ul style="list-style-type: none"> Enhanced communications procedures (public/owners/operators connected to sewers).
Designation of LRO	<ul style="list-style-type: none"> Spec. 5.1 	<ul style="list-style-type: none"> LRO must have authority to ensure compliance, authority over management of the entire sewer system, and authorized to make managerial decisions governing operations, capital improvements, and ensuring long-term environmental compliance. LRO must possess recognized degree/certificate for O/M of sewer systems and/or professional training and experience demonstrated through extensive knowledge, training, and experience.
SSMP Development and Implementation	<ul style="list-style-type: none"> Spec. 5.2 	<ul style="list-style-type: none"> Agencies must develop and implement an SSMP (ensuring adequate funding/management, matching size, scale and complexity, procedures for management, operation, maintenance, prioritization of system repairs and maintenance, implementation of current standard industry practices through available equipment, technologies, and strategies).
Certification of SSMP and Updates	<ul style="list-style-type: none"> Spec. 5.3 	<ul style="list-style-type: none"> Legally Responsible Official must certify/upload SSMPs to CIWQS.
SSMP Development and Update	<ul style="list-style-type: none"> Spec. 5.4 	<ul style="list-style-type: none"> Audits of SSMPs <u>every 3 years</u> (vs. every 2 years under 2006 General Order). Within 6 months after the end of the required 3- year Audit period, the agency Legally Responsible Official shall submit the Audit report into the online CIWQS database per requirements of section 3.10 of Attachment E1 of the Reissued General Order). Audit reports will only be viewable publicly in CIWQS by Water Board staff. Audits must 1) be sized/scaled to system, 2) evaluate implementation and effectiveness of SSMP in preventing spills, 3) identify necessary modifications to SSMP for correcting deficiencies, and 4) include a proposed schedule for correcting deficiencies.
Six-Year SSMP Update	<ul style="list-style-type: none"> Spec. 5.5 	<ul style="list-style-type: none"> Agencies must update their SSMPs and include a summary of revisions based on Audit findings <u>every 6 years</u> (vs. every 5 years under 2006 General Order).
System Resilience	<ul style="list-style-type: none"> Spec 5.6 	<ul style="list-style-type: none"> Agencies must include and implement system-specific procedures to proactively prioritize O/M, condition assessments, and repair/rehabilitation.
Notif, Monit, Report., Records	<ul style="list-style-type: none"> Attachment E-1 	<ul style="list-style-type: none"> Numerous changes throughout; adds one new spill category (Category 4); new reporting requirements for systems with District-owned laterals.

COMPONENT	GENERAL ORDER REFERENCE SECTION	KEY GENERAL ORDER CHANGES IN 2022 ¹
Annual Report	<ul style="list-style-type: none"> • Spec. 5.11 • Spec. 5.12 • Spec. 5.13.2 • Attachment E-1.3.9 	<ul style="list-style-type: none"> • Streamlined (fewer) reporting fields; requires uploading of spill performance charts; includes options for adding comments and/or attaching doc(s) to elaborate on answers.
Service Area Boundary Map	<ul style="list-style-type: none"> • Spec. 5.14 	<ul style="list-style-type: none"> • New requirements for uploading an electronic boundary map (required between July1 to Dec 31, 2025, for all continuing Districts).
Pre-Insp. Questionnaire	<ul style="list-style-type: none"> • Provisions 6.4.2 	<ul style="list-style-type: none"> • Requires agencies to provide pre-inspection information to State and Regional Water Board staff through the completion of a Questionnaire.

2.3 Enforcement Considerations

The District’s Legally Responsible Officials (LROs), managers, and Board of Directors should review and be aware of potential liabilities for noncompliance with the General Order. An excellent practice is to review enforcement language outlined in Specifications 5.17 and 5.18 (page 27) and Provisions 6 (pages 27-31) of the General Order. In addition, the District should also:

1. Keep abreast of the latest Water Board enforcement penalty actions in Region 5 (see [CIWQS Administrative Civil Liability ACL Report](#)) and review example enforcements to improve District understanding about the enforcement process and potential ramifications for noncompliance. Here is one example of a [Region 5: Central Valley Regional Water Board Enforcement](#).
2. Review the most current version of the Water Board Enforcement Policy to understand the specific factors considered by State/Regional Water Boards in assessing civil liabilities with formal enforcement Orders. The most recent Policy was changed in 2017 (potentially affecting the example above). As of June 2024, the State Water Board has proposed additional changes to the Policy. Visit the State Water Board’s Office of Enforcement [Water Quality Enforcement Policy Amendments](#) for the latest Policy.
3. Review the list of common violations summarized in Attachment B of this letter.
- 4.

3.0 SSMP Audit Methodology

The process used to audit the District’s 2014 SSMP is described below and aligns with the recommendations of the *Bay Area Clean Water Agencies Guide for Developing and Updating Sewer System Management Plans*.

1. Collect available background information and system performance data from the District.
2. Conduct a desktop review of information provided by the District and publicly available benchmark data.
3. Conduct staff interviews at all levels of the organization - including operations and maintenance staff.
4. Evaluate the existing SSMP for **compliance, implementation** and **effectiveness** while addressing system **resilience**.
5. Develop a draft SSMP Audit Report summarizing findings and a corrective action plan.
6. Review the draft SSMP Audit Report with District staff (including operations and maintenance staff) and document an agreed upon schedule.
7. Finalize the SSMP Audit Report and submit it to the District for certification/upload.

The General Order requires that the audit evaluate the existing SSMP for **compliance, implementation** and **effectiveness** while addressing system **resilience**. These terms are defined as:

- **Compliance** is the act of meeting regulations. Compliance is the most fundamental aspect of the SSMP as all the requirements in the individual elements must be incorporated and addressed. Attachment D of the General Order specifies “The District’s development, update, and implementation of an SSMP addressing the requirements of this Attachment is an enforceable component of this General Order.”
- **Implementation** is the actions or steps taken to accomplish tasks, goals, and objectives. There needs to be a plan and schedule to carry out these actions. To implement a plan, a goal, level of effort, resources, and timeline need to be determined.
- **Effectiveness** is the degree to which something is successful in producing a desired result. There must be a procedure or method to measure effectiveness so the degree to which something is effective can be determined. A requirement of an internal audit (Element 10 of the SSMP) is to measure the effectiveness of each SSMP element.
- **Resilience** is the ability to recover from or adjust to adversity or change and grow from disruptions and includes recovering from system failures. Resilience can be built through planning and preparation for, mitigation of, and adaptation to changing conditions.

Key Performance Indicators (KPIs) are used to evaluate the effectiveness of the program. A KPI is a measurable target that indicates how plans and processes are working in terms of obtaining desired results. KPIs provide focus for strategic and operational improvements, create an analytical basis for decision making, and help place attention on what matters most.

4.0 SSMP Audit

This section describes the SSMP audit findings and recommended corrective actions (with schedule) for the three-year audit period ending August 2, 2024.

4.1 Desktop Assessment

BV reviewed available information provided by the District including organization charts, CIWQS records, workorder data, geodatabases, maintenance and inspection record database, Master Plan, District ordinances, the existing 2014 SSMP, the 2023 SERP, and spill records. BV also conducted staff interviews with all levels of the organization to gather updated information about the District’s current wastewater collection system program.

BV reviewed the District’s previous audit from 2014, and the list of deficiencies appear to have been rectified, although the updates at this point are dated.

The information provided by the District was compiled and evaluated using a desktop assessment. This information is presented in Attachments C through F of this letter and includes:

- System Information – Attachment C
- Maintenance Records – Attachment D
- Spill Data Summary – Attachment E
- Key Performance Indicators – Attachment F

4.2 SSMP Evaluation

The following table summarizes the findings and corrective actions from evaluation of the **compliance**, **implementation**, and **effectiveness** of the existing SSMP. As required by the General Order, the draft audit and corrective action plan will be distributed to operation and maintenance staff for their input.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
ELEMENT 1 – GOAL AND INTRODUCTION				
The goal of the SSMP is to provide a plan and schedule to: “Properly manage, operate, and maintain all parts of the District’s sanitary sewer system, reduce and prevent spills, contain and mitigate spills that do occur.				
1.1 REGULATORY CONTEXT				
A.	The SSMP Introduction section must provide a general description of the local sewer system management program and discuss SSMP implementation and updates.	Compliance	<ul style="list-style-type: none"> • Add this newly required subsection to the SSMP. • Provide a general description of the SSMP and how you will implement and update it. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	<ul style="list-style-type: none"> • Add a table of staff positions and roles/responsibilities for SSMP review, development, implementation, and updates for each Element. • Include the process in place for ensuring the SSMP will be fully implemented as written – including periodic review dates of the entire SSMP for ensuring continuous compliance, implementation, and striving to improve effectiveness of all elements. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Effectiveness	Review KPIs for each element; adjust element content and update the SSMP Change Log as necessary prior to completion of next audit.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
1.2 SSMP UPDATE SCHEDULE				
B.	The SSMP Introduction section must include a schedule for the District to update the SSMP, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing sewer spill prevention.	Compliance	<ul style="list-style-type: none"> • Add this newly required subsection to the SSMP. • Include a compliance plan & schedule (see Attachment A as a start): <ul style="list-style-type: none"> • Required due dates for updating the SSMP. • When you will conduct SSMP Audits, including audit period covered, start and finish dates. • Annual review of previous SSMP audit findings. • Update Element 1 whenever 1) significant work/program or organizational changes are made, 2) anytime the SSMP Implementation Team has a change of members/responsibilities, 3) when SSMP audits are completed. • List of significant milestones of spill prevention activities (cleaning, inspection, repair, etc.) that will be conducted during the six-year SSMP update cycle. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Implementation	Develop KPI's for measuring whether SSMP audits and updates were performed on schedule, and sewer program milestone dates are met.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	<ul style="list-style-type: none"> • Add reviews and deadlines to staff/District calendars to avoid missing deadlines or violating General Order requirements. • Track KPI's for measuring whether SSMP audits and updates were performed on schedule, and sewer program milestone dates (such as annual maintenance and inspection footage goals or pump station schedules) are met. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
1.3 SEWER SYSTEM ASSET OVERVIEW				
C.	<p>The District SSMP must have an Introduction section to provide a description of the District-owned assets and service area including but not limited to:</p> <ul style="list-style-type: none"> • Location, including county(ies). • Service area boundary. • Population and community served. • System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons. • Structures diverting stormwater to the sewer system. • Data management systems. • Sewer system ownership and operation responsibilities between District and private entities for upper and lower sewer laterals. • Estimated number or percent of residential, commercial, and industrial service connections. • Unique service boundary conditions and challenge(s). 	Compliance	<ul style="list-style-type: none"> • Add this newly required subsection to the SSMP including: <ul style="list-style-type: none"> • Current service area, population, and sewer assets in the map. • Include unique features or characteristics that are challenging like the highway, inaccessible areas, surface water crossings, etc. that present challenges. • Ownership and operation responsibilities with Cities. • Percent of residential, commercial, and industrial connections. • Statement confirming system maps (also required by Element 4) are up to date. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	Combine with Element 4 map requirements. Establish a schedule for GIS data review and update and assign review/update tasks to a responsible person.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Utilize vendor CalCAD to update maps and map SOPS/KPIs 6/2025.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
	Reference to the District’s up to-date map of its sanitary sewer system.	Effectiveness	Combine with Element 4 map requirements. Develop KPIs around keeping GIS up to date and in a timely manner.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Utilize vendor CalCAD to update maps and map SOPS/KPIs 6/2025.
ELEMENT 2 – ORGANIZATION				
A.	<p>The SSMP must identify organizational Staffing responsible and integral for implementing the local SSMP through an organizational chart or other similar narrative documentation that includes:</p> <ul style="list-style-type: none"> • The name of the Legally Responsible Official as required in section 5.1 (Designation of a Legally Responsible Official) of the General Order. • The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific SSMP elements. • Organizational lines of authority. • Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. 	Compliance	<ul style="list-style-type: none"> • Update names(s) and contact info for (LROs) and Data Submitters in Appendix A. • Update contact information for management, administrative, and maintenance positions. Refer to the June 2023 Sanitary Sewer Overflow Response Plan. • Develop an organization chart or update the narrative lines of authority. • Update description of the chain of communication for spills from receipt of a call reporting a spill, to the spill report certification. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	<p>Annually review to ensure:</p> <ul style="list-style-type: none"> • LRO information is current. • Contact information for management, administrative, and maintenance positions are current. • Chain of communication for spills is correct. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	<p>Develop a KPI around annually updating this Element to ensure:</p> <ul style="list-style-type: none"> • The assigned responsibilities for implementing the SSMP are updated, and all changes are documented in the SSMP change log. • Organizational chart is up to date. • All service calls and documentation are being properly routed to appropriate personnel, and all spill response activities are documented and forwarded to the LRO. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
ELEMENT 3 – LEGAL AUTHORITY				
The District SSMP must include copies or an electronic link to the District’s current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the District possesses the necessary legal authority to:				
B.	Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that may cause blockages.	Compliance	Add a hyperlink directly to the code document on the District’s website.	District Engineer – 6/2025
		Implementation	Establish and implement a procedure for updating ordinances, codes, and agreements when deficiencies are discovered by staff.	District Engineer – 6/2025
		Effectiveness	Develop KPI to determine if District codes and ordinances are adequate for fulfilling the SSMP legal requirements.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
C.	Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure.	Compliance	Add this new requirement to the SSMP.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	Ensure any agreements are up to date.	District Engineer – 12/2025
		Effectiveness	Develop KPIs to routinely collaborate with cities or other stormwater agencies.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
D.	Require that sewer system components and connections be properly designed and constructed.	Compliance	Update SSMP with reference to newly updated District code – or verify weblink is current/correct.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	Construction standards available on the District website are from 2001. Likely needs minor updates.	District Engineer – 6/2025
		Effectiveness	Develop a KPI to update codes every 10 years at a minimum.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
E.	Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the District.	Compliance Implementation Effectiveness	(No action. District has a blanket easement for access.)	-
F.	Enforce violation(s) of ordinances, service agreements, or other legally binding procedures.	Compliance	Develop standard operating procedure for record keeping and enforcement requirements.	District Engineer – 6/2025
		Implementation	Ensure ordinance/codes/service agreements are available to staff for reference when needed.	District Engineer – 6/2025
		Effectiveness	Develop a KPI to track violations and enforcement activities.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
G.	Obtain easement/accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.	Compliance	(No action. District has a blanket easement for access.)	-
		Implementation		
		Effectiveness		
ELEMENT 4 – OPERATIONS AND MAINTENANCE PROGRAM				
4.1 UPDATED MAP OF SANITARY SEWER SYSTEM				
A.	<p>The SSMP must include the items listed below that are appropriate and applicable to the District’s system:</p> <p>An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s).</p> <p>The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries.</p>	Compliance	Create a webmap and provide the State and Regional Water Board access (potentially through a hyperlink in the SSMP).	District Engineer – Utilize vendor CalCAD to update maps and map SOPS/KPIs 6/2025.
		Implementation	Establishing procedure(s) for keeping maps/webmaps current.	District Engineer – Utilize vendor CalCAD to update maps and map SOPS/KPIs 6/2025.
		Effectiveness	Develop an annual KPI to track that: <ul style="list-style-type: none"> All map updates were completed in a timely manner. Appropriate staff are trained in the procedure for providing map update information. Newly installed sewer assets are incorporated into the system maps. Terrain features are incorporated in future map book/webmap updates. 	District Engineer – Complete SSMP Master Compliance Schedule 12/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
4.2 PREVENTIVE OPERATION AND MAINTENANCE ACTIVITIES				
A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors must include:				
B.	Inspection and maintenance activities.	Compliance	<ul style="list-style-type: none"> Update Section 4.2 to reflect current activities (remove reference to Hansen, update manhole inspection program, describe the new smart covers, describe sewer inspection activities, describe dig-up repairs on sewer hot spots, etc.). Consider revising plan to delay first cleaning of new sewers until their 10th birthday (unless below minimum slope). Consider inspection-triggered cleaning cycles rather than age-based. 	Collection System Supervisor – 6/2025
		Implementation	Include the plan and schedule for completing inspection and maintenance activities.	Collection System Supervisor – 6/2025
		Effectiveness	Develop KPIs to track if the inspection and maintenance work is being completed as scheduled.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Complete SSMP Master Compliance Schedule 12/2025
C.	Higher-frequency inspections.	Compliance	Develop plan for inspecting trouble spots more frequently – including troublesome lift stations.	Collection System Supervisor – 6/2025
		Implementation	Add a plan and schedule for trouble spot/station higher-frequency inspections (potentially through a system map color coded by inspection frequency or quarterly scheduling map or table).	Collection System Supervisor – 6/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Effectiveness	Develop KPIs that track the number/volume of blockages, spills, or lift station alarms for trouble spots/stations to evaluate effectiveness.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Complete SSMP Master Compliance Schedule 12/2025
D.	Maintenance of known problem areas including areas with tree root problems.	Compliance	No action needed.	
		Implementation	Add a plan and schedule for trouble spot/station higher-frequency cleaning (potentially through a system map color coded by cleaning frequency or quarterly scheduling map or table).	Collection System Supervisor – 6/2025
		Effectiveness	Develop KPIs that track the number/volume of blockages, spills, or lift station alarms for trouble spots/stations to evaluate effectiveness.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Complete SSMP Master Compliance Schedule 12/2025
E.	Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.	Compliance	Describe the CCTV and manhole inspection cycles.	Collection System Supervisor – 6/2025
		Implementation	Identify a period where the entire system should receive inspection.	District Engineer – 6/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Effectiveness	Develop KPI to track inspection schedule compliance.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Complete SSMP Master Compliance Schedule 12/2025
F.	The data collection system must document the data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure.	Compliance	Describe DASH, the new computerized maintenance management system (CMMS) and how it tracks inspection & maintenance schedules, activities, and facilitates District review/adjustment. Describe data collection system for service calls, SSOs and blockages.	District Engineer – Utilize vendor CalCAD to update maps and map SOPS/KPIs 6/2025.
		Implementation	Add the maintenance and inspection cycle to CMMS for all key assets, periodically evaluate them, and adjust as needed.	Collection System Supervisor – 12/2025
		Effectiveness	Develop KPI to track the timeliness and accuracy of the CMMS data for analytical purposes. Refine the mandatory fields/picklists as needed to facilitate better data analysis of historical performance/results.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
4.3 TRAINING				
G.	In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors. The training must cover: <ul style="list-style-type: none"> • The requirements of the General Order; • The District’s SERP procedures and practice drills, • Skilled estimation of spill volume for field operators, and • Electronic CIWQS reporting procedures for staff submitting data. 	Compliance	Describe a training program for spill response personnel, data submitters, and LROs that meets all the requirements and list the regular training frequency (the appropriate level of training is at the District’s discretion).	District Engineer – 12/2025
		Implementation	Continue to keep consistent records of training and attendance.	District Engineer – 12/2025
		Effectiveness	Quiz staff ability and knowledge after each training event. Suggest developing a KPI to track that training has been completed at the appropriate frequency.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
4.4 EQUIPMENT INVENTORY				
H.	An inventory of sewer system equipment, including the identification of critical replacement and spare parts.	Compliance	Suggest defining critical spare parts as parts and equipment that: 1) must be operational to return a pipe/pump station to operation, or 2) should be kept on hand because they are not readily available for procurement. Maintain an inventory log and annually audit the inventory to ensure the inventory is up to date and all critical parts are available.	Collection System Supervisor – 12/2026
		Implementation	Document inventory audit efforts to include name of person, date, and changes. Clearly label critical spare parts, provide access, and make personnel aware of their location to facilitate a timely response.	Collection System Supervisor – 12/2026
		Effectiveness	Develop KPIs to identify and rectify any inventory deficiencies or omissions.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
ELEMENT 5 – DESIGN AND PERFORMANCE PROVISIONS				
5.1 UPDATED DESIGN CRITERIA AND CONSTRUCTION STANDARDS AND SPECIFICATIONS				
The SSMP must include the following items as appropriate and applicable to the District’s system:				
A.	Updated design criteria, and construction standards and specifications for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances.	Compliance	Review existing District design criteria, and construction standards and specifications every 5 years to ensure industry best practices are considered.	District Engineer – 12/2025
		Implementation	Describe how revisions/updates are documented.	District Engineer – 12/2025
		Effectiveness	Develop KPIs to ensure the District implements its current design and construction standards, specifications, and inspection procedures. Measure by annual review to ensure conformance to requirements.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
B.	If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic capacity as specified in Element 8 (System Evaluation, Capacity Assurance and Capital Improvements), the procedures must include component-specific evaluation of the design criteria.	Compliance	Update design criteria per Master Plan to address hydraulic capacity for both pipes and pump stations.	District Engineer – 12/2025
		Implementation	Revisit areas of the collection system experiencing surcharging during master plan update (every 10 years at a minimum).	District Engineer – 12/2025
		Effectiveness	Develop KPI to track Capacity-related SSOs.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
5.2 PROCEDURES AND STANDARDS				
C.	Procedures and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.	Compliance	Update procedures and standards for inspection and testing of new improvements including inspection record review to ensure adherence to standards and specifications.	District Engineer – 12/2025
		Implementation	Describe and implement a process for staying abreast of industry standards.	District Engineer – 12/2025
		Effectiveness	Potentially track when a deviation from standard procedures and/or specs is necessary.	District Engineer – 12/2025
ELEMENT 6 - SPILL EMERGENCY RESPONSE PLAN				
The SSMP must include an up-to-date SERP to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The SERP must include procedures to meet all the following:				
A.	Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner.	Compliance	Start flow charts from call to the District reporting the spill, and end flow charts with reporting to appropriate District staff, local officials, and regulatory agencies.	Collection System Supervisor – 12/2026
		Implementation	Establish realistic response time goals and monitor emergency response performance. Include a call-list for all appropriate contacts and ensure it is readily available to response staff.	Collection System Supervisor – 12/2026
		Effectiveness	Potentially develop a KPI to track notification and response times.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
B.	Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State.	Compliance	Distinguish flow charts for Category 1 spills and what triggers calls to outside agencies such as the Cities or County Health.	Collection System Supervisor – 12/2025
		Implementation	Include a call-list for all appropriate contacts and ensure it is readily available to response staff.	Collection System Supervisor – 12/2025
		Effectiveness	(No action. From SSO documents, calls to outside agencies appear to have been made appropriately.)	
C.	Comply with the notification, monitoring and reporting requirements of the General Order, State law and regulations, and applicable Regional Water Board Orders.	Compliance	Expand the “Reporting” procedures to report spill events as required in the General Order along with reporting timelines.	Collection System Supervisor – 12/2025
		Implementation	Ensure appropriate staff are familiar with reporting timelines and trained in data submitting, as required by the Reissued General Order.	Collection System Supervisor – 12/2025
		Effectiveness	(No action. Evaluate once information is updated.)	

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
D.	Ensure that appropriate staff and contractors implement the SERP and are appropriately trained.	Compliance	Set an interval (such as annually) for SERP procedure training. Add flow chart for contractor procedures.	Collection System Supervisor – 12/2025
		Implementation	Describe a training program for contractors that (at a minimum) includes requiring immediate notification to District, providing direction for containment and recovery, for securing the spill site and protecting the public, and requiring contractors stay on site until District response personnel arrive.	Collection System Supervisor – 12/2025
		Effectiveness	Develop KPI to ensure staff and contractors receive routine training.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
E.	Address emergency system operations, traffic control, and other necessary response activities.	Compliance	Update SERP to include this information along with procedures for spills at Lift/Pump Stations and/or force mains including bypass pumping.	Collection System Supervisor – 12/2025
		Implementation	Include how to coordinate with law enforcement and/or fire departments for assistance in large volume traffic areas.	Collection System Supervisor – 12/2025
		Effectiveness	(No action. Evaluate once information is updated and easily identifiable.)	
F.	Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system.	Compliance	(No action.)	
		Implementation	Train on containment and perform drills to ensure staff are competent.	Collection System Supervisor – 12/2025
		Effectiveness	Annually review potential spills reaching or nearly reaching water of the State or any drainage conveyance system. Update the procedure to include any deficiencies that allowed this to happen.	Collection System Supervisor – 12/2025
G.	Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the state.	Compliance	Update SERP to include this information.	Collection System Supervisor – 12/2025
		Implementation	Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State. Make efforts to keep the spill footprint as small as possible. Cordon off the spill site to prevent people from getting into the area.	Collection System Supervisor – 12/2025
		Effectiveness	(No action. Minimization and remediation efforts appear effective.)	
H.		Compliance	(No action.)	

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
	Remove sewage from the drainage conveyance system.	Implementation	(No action.)	
		Effectiveness	(No action. Efforts appear effective.)	
I.	Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters.	Compliance	(No action.)	
		Implementation	(No action.)	
		Effectiveness	(No action. No Cat 1 spill since 2014.)	
J.	Implement technologies, practices, equipment, and interagency coordination to expediate spill containment and recovery.	Compliance	(No action.)	
		Implementation	(No action.)	
		Effectiveness	(No action.)	
K.	Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event.	Compliance	Include pre-planned coordination procedures with the storm drain agencies.	Collection System Supervisor – 12/2026
		Implementation	(No action.)	
		Effectiveness	(No action.)	
L.	Conduct post-spill assessments of spill response activities.	Compliance	Add post-spill assessment to flow charts/procedures.	Collection System Supervisor – 12/2025
		Implementation	Involve (at the least) staff that played a role in the response. Evaluate each spill event for adherence to the SERP and for effectiveness.	Collection System Supervisor – 12/2025
		Effectiveness	Implement lessons learned prior to the next spill event.	Collection System Supervisor – 12/2025
M.	Document and report spill events as required in the General Order.	Compliance	Update flow charts and procedures to cover detailed documentation and reporting procedures.	Collection System Supervisor – 12/2025
		Implementation	(No action. Evaluate after SERP update.)	
		Effectiveness	(No action. Evaluate after SERP update.)	

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
N.	Annually, review and assess effectiveness of the SERP and update it as needed.	Compliance	Include a schedule to annually review and assess effectiveness of the SERP and update as needed.	Collection System Supervisor – 12/2025
		Implementation	Review all Post-spill evaluations for trends and instances when the procedures did not produce the desired results. Ensure all contacts and contact information is up to date. Ensure any changes made are implemented. Maintain SSMP Change Log.	Collection System Supervisor – 12/2025
		Effectiveness	Develop KPI to track SERP review/update schedule compliance.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
ELEMENT 7 – SEWER PIPE BLOCKAGE CONTROL PROGRAM				
The SSMP must include procedures for the evaluation of the District’s service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags, and debris. If the District determines that a program is not needed, the District shall provide justification in its SSMP for why a program is not needed. The procedures must include, at minimum:				
A.	An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances.	Compliance	Update this section with the new requirements by describing a pipe blockage control program (including necessary legal/enforcement authority) that addresses the system’s most common blockage-causing defects, such as roots, fats/oils/grease, wipes, etc. <ul style="list-style-type: none"> • Include door hangers, flyers, bill stuffers, newsletters, etc. with District message. • Update District message on the website. • Have a presence at community events to convey District message. 	Assistant to General Manager 12/2025
		Implementation	Establish a schedule that lists the events, actions, and timelines.	Assistant to General Manager 12/2025
		Effectiveness	Potentially develop a KPI to collect feedback on public outreach efforts and/or track compliance with the schedule.	Assistant to General Manager 12/2025
B.	A plan and schedule for the disposal of pipe-blocking substances 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 substances generated within a sanitary sewer system service area.	Compliance	Add a list of acceptable disposal facilities.	Collection System Supervisor – 12/2025
		Implementation	Add procedures in Element 4 describing the utilization of hydro-vac to return water to the sewer system; dispose of debris at the treatment plant (or other appropriate facility).	Collection System Supervisor – 12/2025
		Effectiveness	(No action.)	
C.		Compliance	(No action.)	

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
	The legal authority prohibits discharges to the system and identifies measures to prevent spills and blockages.	Implementation	(No action.)	
		Effectiveness	(No action.)	
D.	Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping and reporting requirements.	Compliance	Update SSMP to include specifications on grease removal devices, standard drawings, maintenance requirements, and BMP requirements.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Implementation	Ensure requirements are in place for grease handling recordkeeping and reporting requirements.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025. District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	Develop KPI around inspecting device maintenance and enforcing reporting requirements.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
E.	Authority to inspect grease producing facilities, enforcement authorities, and whether the District has sufficient staff to inspect and enforce the fats, oils, and grease ordinance.	Compliance	Update this section with whether the District has sufficient staff to inspect and enforce the fats, oils, and grease ordinance.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Implementation	(No action.)	

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Effectiveness	Develop KPI to ensure there is adequate staff availability and training to perform inspections/enforcement.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
F.	An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section.	Compliance	(No action.)	
		Implementation	(No action.)	
		Effectiveness	Develop KPI to track repeat blockages and overflows.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
G.	Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above.	Compliance	Implement control measures to minimize blockages.	District Engineer – 12/2026
		Implementation	Ensure the District public outreach programs address pipe blocking items.	Assistant to General Manager 12/2025
		Effectiveness	Develop KPI to track repeat blockages and overflows and their causes.	
ELEMENT 8 – SYSTEM EVALUATION, CAPACITY ASSURANCE, AND CAPITAL IMPROVEMENTS				
The SSMP must include procedures and activities for: Routine evaluation and assessment of system conditions, Capacity assessment and design criteria, Prioritization of corrective actions, and capital improvement plan.				
8.1 SYSTEM EVALUATION AND CONDITION ASSESSMENT				
The SSMP must include procedures to:				
A.	Evaluate the sanitary sewer system assets utilizing the best practices and technologies available.	Compliance	Perform and document systematic inspections on all gravity pipes, manholes and lift/pump stations (including sub-assets of lift/pump stations), including force mains/ siphons, etc. Include historic inspection records when performing the evaluation.	Collection System Supervisor – 12/2025
		Implementation	Determine an inspection frequency for each asset.	Collection System Supervisor – 12/2025
		Effectiveness	Develop KPIs to measure the annual review of all inspection data (CCTV) including spill events where there was evidence of capacity issues, including periodic reviews of visual manhole inspection and flow/level sensor data during wet weather events.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
B.	Identify and justify the amount (percentage) of its system for its condition to be assessed each year.	Compliance	Evaluate past performance, maintenance and repair efforts, and the risk levels from the Master Plan to determine an inspection frequency for each part of the system and describe in this Element of the SSMP.	District Engineer 12/2026
		Implementation	Develop an inspection plan and schedule.	District Engineer 12/2026
		Effectiveness	Develop KPIs to annually review inspection data and initiate the contract or workorders for the next year of inspection locations.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
C.	Prioritize the condition assessment of system areas that: <ul style="list-style-type: none"> • Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies. • Are located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas. • Are within the vicinity of a receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List (check with your local Regional Water Quality Control Board for their latest lists). 	Compliance	Prioritize condition assessment based on the risk levels determined in the Master Plan and add assets nearest to the Kings River, which is on the Clean Water Act section 303(d) List.	District Engineer 12/2026
		Implementation	Inspect high risk assets according to the frequency determined above.	District Engineer 12/2026
		Effectiveness	Develop KPIs to ensure all high priority locations are receiving inspections as planned.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
D.	Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods.	Compliance	Determine an inspection frequency for each asset including lift/pump stations, air release valves, and force mains - including alignment inspections/route walks.	Collection System Supervisor – 12/2026
		Implementation	Identify the portions of the collection system with evidence of infiltration. If ground water is infiltrating the pipe, when the water table recedes, it is possible for sewage to exfiltrate (see Section 3.24 of Reissued General Order for more information on exfiltration).	District Engineer – 12/2026
		Effectiveness	Develop KPIs to annually determine high priority areas that should receive more frequent inspections.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
E.	Utilize observations/evidence of system conditions that may contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State.	Compliance	Update SSMP to include this new requirement.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Implementation	Identify the portions of the collection system with evidence of infiltration. If ground water is infiltrating the pipe, when the water table recedes, it is possible for sewage to exfiltrate (see section 3.24 of Reissued General Order for more information on exfiltration).	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	Develop KPIs to limit the possibility of sewage being discharged into a water of the State.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
F.	Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities.	Compliance	Maintain records of condition assessment and inspections. No records were provided by the District for this audit.	District Engineer – 12/2026
		Implementation	Annually review inspection data to track any major or minor changes in the system. All changes should be tracked in a change log.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	Develop a KPI to track that inspection records are readily available and reviewed annually.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
G.	Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to sea level rise; flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions.	Compliance	Update SSMP to include this new requirement.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Implementation	Maintain a list of vulnerable assets and their hazards.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Effectiveness	Coordinate any major risk mitigation needs with your Local Hazard Mitigation Plan, since its projects may be eligible for FEMA funding.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
8.2 CAPACITY ASSESSMENT AND DESIGN CRITERIA				
H.	The SSMP must include procedures to identify system components that are experiencing or contributing to spills caused by hydraulic deficiency and/or limited capacity, including procedures to identify the appropriate hydraulic capacity of key system elements for: <ul style="list-style-type: none"> • Dry-weather peak flow conditions that cause or contribute to spill events. • The appropriate design storm(s) or wet weather events that causes or contributes to spill events. • The capacity of key system components. • Identify the major sources that contribute to the peak flows associated with sewer spills. 	Compliance	Include the Collection System Master Plan as an Appendix.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	Develop and implement a system evaluation procedure.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Effectiveness	Develop a KPI target for updating the hydraulic model to identify the major sources that contribute to the peak flows associated with sewer spills.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
I.	The capacity assessment must consider condition assessments, inspections, audits, spill history, capacity of flood-prone systems under storm conditions, increased inflow and infiltration due to larger/higher intensity storms due to climate	Compliance	Include the Collection System Master Plan as an Appendix.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
	change, updated design storm, and necessary redundancy in pumping and storage.	Implementation	Develop and implement a system evaluation procedure.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Effectiveness	Develop a KPI target for updating the Master Plan to incorporate these resilience elements.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
8.3 PRIORITIZATION OF CORRECTIVE ACTIONS				
J.	The findings of the condition assessments and capacity assessments must be used to prioritize corrective actions. Prioritization must consider the severity of the consequences of potential spills.	Compliance	Include the Collection System Master Plan as an Appendix. Incorporate any available condition assessment information for gravity sewers and force mains that may be available.	District Engineer – 12/2026
		Implementation	<ul style="list-style-type: none"> Utilize all available data for prioritizing corrective actions considering severity/consequences of potential spills. Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities. Documentation may include CCTV records, manhole inspection records, lift/pump station inspection records, hydraulic model updates. 	District Engineer – 12/2026
		Effectiveness	Develop KPIs to assess annual review and update of system inspection/evaluation and prioritization/corrective actions procedures.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
8.4 CAPITAL IMPROVEMENT PLAN				
The capital improvement plan must include the following items:				
K.	Project schedules include completion dates for all portions of the capital improvement program.	Compliance	Include the Collection System Master Plan as an Appendix, and a fly-sheet of the CIP schedule (with anticipated completion dates) that can be updated easily.	District Engineer – 12/2025
		Implementation	Timelines can and should be adjusted based on changing priorities. However, reasons for deviation from the plan should be documented.	District Engineer – 12/2026

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Effectiveness	Develop KPI to determine if the capital improvement plan has been adhered to.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
L.	Internal and external project funding sources for each project.	Compliance	Include financing and timing for projects within both the short-term (within the next 2-3 years) and long-term (within the next 5-10 years).	District Engineer – 12/2026
		Implementation	For unfunded projects, list the plan to secure funding for the 10-year CIP.	District Engineer – 12/2026
		Effectiveness	Track lesson learned for successful and unsuccessful funding opportunities.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
M.	Joint coordination between operation and maintenance staff, and engineering staff/consultants during planning, design, and construction of capital improvement projects; and Interagency coordination with other impacted utility agencies.	Compliance	Update the SSMP to include discussion regarding CIP coordination efforts.	District Engineer – 12/2026
		Implementation	Holding regular coordination meetings that include all providers and stakeholders helps to keep the project on track and resolve issues that may arise in a timely manner.	District Engineer – 12/2026
		Effectiveness	Develop KPI to ensure there is an annual review of the Capital Improvement Plan by all necessary individuals including both Engineering and Operations.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
SECTION 9 – MONITORING, MEASUREMENT AND PROGRAM MODIFICATIONS				
The SSMP must include an Adaptive Management section that addresses SSMP implementation, effectiveness, and the steps for necessary SSMP improvement, including:				
A.	Maintaining relevant information, including audit findings, to establish and prioritize appropriate activities.	Compliance	Retroactively audit the SSMP for periods ending 8/2/2015, 8/2/2019, and 8/2/2021 keep them on-hand as required.	District Engineer – 12/2027
		Implementation	Systematic collection of data and storage of data in a manner that it is readily available for analysis is paramount. Storing data in a database is optimal for reporting and data analysis. Storing the data on paper in large volume is cumbersome and difficult to analyze.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Effectiveness	Develop KPI to ensure all relevant information is being organized and easily accessible.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
B.	Monitoring the implementation and measuring the effectiveness of each SSMP element.	Compliance	Develop a consolidated list of KPIs that meet the objectives listed for each Element above. This Audit Corrective Action Plan addresses necessary improvements needed before the next SSMP audit and update are due.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Implementation	<ul style="list-style-type: none"> Periodic SSMP review meetings to ensure that the SSMP is being carried out, ensuring staff specified in Element 2 are included/documented in reviews. Graphing historical system performance and spill performance results to assist with evaluating effectiveness (and comply with Attachment D, Section 9). 	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	Develop KPI to track addressing audit findings/deficiencies.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
C.	Assessing the success of the preventive operation and maintenance activities.	Compliance	Describe measuring <u>actual</u> outcomes against <u>intended</u> outcomes by annually reviewing the SSMP goals and objectives.	Collection System Supervisor – 12/2026
		Implementation	(No action.)	
		Effectiveness	Develop KPIs that monitor trends and corrective actions taken.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
D.	Updating SSMP procedures and activities, as appropriate, based on results of monitoring and performance evaluations.	Compliance	Monitor work program effectiveness and adapt or adjust as necessary, document changes in most recent District internal audit.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Implementation	The SSMP is required in Attachment D to be a “living document,” which means it is continually edited and updated (and edits maintained/included in the Change Log). Periodic review is the key. Periodic SSMP review meetings are recommended for ensuring the SSMP is being implemented and carried out.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
		Effectiveness	Develop KPIs to make changes to work programs and procedures as a result of program assessments.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
E.	Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes.	Compliance	Maintain relevant system performance and spill information at all levels of the sewer program in a way that can be practically evaluated. Monitor historic spill and system performance trends.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Implementation	Maintain data in a manner that can be reviewed and evaluated makes the data more valuable.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	Develop KPIs to ensure spill trends are being properly managed.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
ELEMENT 10 – INTERNAL AUDITS				
<p>The SSMP shall include internal audit procedures, appropriate to the size and performance of the system, for the District to comply with section 5.4 (SSMP Audits) of the General Order. The District shall conduct an internal audit of its SSMP, and implementation of its SSMP, at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the District’s last required audit period. Within six months after the end of the required 3-year audit period, the Legally Responsible official shall submit an audit report into the online CIWQS Sanitary Sewer System Database per the requirements in section 3.10 (SSMP Audit Reporting Requirements) of Attachment E1 of the General Order. Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff. The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills. The District’s sewer system operators must be involved in completing the audit.</p>				
A.	<p>At minimum, the audit must:</p> <ul style="list-style-type: none"> Evaluate the implementation and effectiveness of the District’s SSMP in preventing spills. Evaluate the District’s compliance with the General Order. 	Compliance	Attach this Audit as an Appendix to the SSMP.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
	<ul style="list-style-type: none"> Identify SSMP deficiencies in addressing ongoing spills and discharges to waters of the State. Identify necessary modifications to the SSMP to correct deficiencies. 	Implementation	<ul style="list-style-type: none"> Include findings, recommended corrective actions, input from collection system operations staff, and a proposed schedule to address identified deficiencies. If established goals are not being met and outcomes are not as intended (or if there are no established goals), then the SSMP is deficient, at least in part. Once the audit findings have been determined, distribute findings to operations staff; allow ample time for review; and hold a meeting to discuss and document outcomes of discussion. Regularly maintain SSMP Change Log based on modifications necessary to address deficiencies. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Effectiveness	At a minimum, focus KPIs on measuring each Elements effectiveness in preventing spills and compliance with the General Order.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
B.	<p>The District shall submit a complete audit report that includes:</p> <ul style="list-style-type: none"> Audit findings and recommended corrective actions. A statement that sewer system operators’ input on the audit findings has been considered. A proposed schedule for the District to address the identified deficiencies. 	Compliance	Routinely schedule audits every 3 years.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Implementation	<p>Submit complete audit report in CIWQS that includes:</p> <ul style="list-style-type: none"> District SSMP audit findings and recommended corrective actions. Findings and recommended corrective actions should be formalized in a table or report. A statement that sewer system operators’ input on the audit findings has been considered. 	District Engineer – Complete SSMP Master Compliance Schedule 12/2025
		Effectiveness	Develop KPIs to ensure all past SSMP internal audit findings and schedules are met and incorporated into the SSMP update.	District Engineer – Complete SSMP Master Compliance Schedule 12/2025

REQUIREMENT		CORRECTIVE ACTION PLAN		
		FACTOR	ACTION	NAME/SCHEDULE
ELEMENT 11 – COMMUNICATION PROGRAM				
The SSMP must include procedures for the District to communicate with:				
A.	The public for spills and discharges resulting in closures of public areas, or that enter a source of drinking water, and the development, implementation, update of its SSMP, including opportunities for public input to SSMP implementation and updates.	Compliance	Describe communication procedures to ensure adequate public communication for sewage spills that resulted in closure of public areas or impacted drinking water sources. Develop a plan for ensuring regular public communication during the SSMP development, implementation, and updates – potentially through a standing monthly/quarterly Board update on SSMP implementation activities.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	When the SSMP is updated and approved by the Board, there will be an opportunity for public comment. Issue newsletters or mailers informing the public anytime an action is taken, it is a public record. KPI dashboards may help if monthly or quarterly public/Board updates are needed.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Effectiveness	Develop KPIs to determine if: <ul style="list-style-type: none"> All SSMP action items are placed on the agenda for regular counsel/board meetings. Readily available signage, or other means, to notify the public of environmental or public risk factors related to a sewage spill. 	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
B.	Owners/operators of systems that connect into the District’s system, including satellite systems, for system operation, maintenance, and capital improvement-related activities.	Compliance	Describe communication protocols with system owners/operators connecting to the District’s collection system for related operations, maintenance, and capital improvement activities.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.
		Implementation	(No action.)	
		Effectiveness	Document and track communications.	General Manager – Solicit proposals for SSMP Update 2/2025. Complete SSMP Update 8/2025.

4.3 Disclaimer

BV and Dopudja & Wells are providing professional judgement as to the compliance of the District's Wastewater Collection System Program and are not providing legal assurance of compliance with regulations and requirements. The District is responsible for legal review and compliance of the District's program and documents with State and Federal requirements.

It was a pleasure working with you on this audit. Please contact me at (925) 949-5989 if you have any questions or need additional clarification.

Sincerely,

Dopudja & Wells Consulting



Jon Wells, P.E.

Principal and Project Manager

JMW

Attachments



Sewer System Management Plan Audit

Attachment A. Annual General Order Compliance Checklist

Target Date	Due Date	Action Items (CY2024-2025)	Completion Date
Jan 2024	Due FEB 1, 2024	Cat 4 / Non-Cat 1 Laterals Spills (<50 gallons)	
March 2024	Due APRIL 1, 2024	SERP (review/update prior to completing Annual Report)	
March 2024	Due APRIL 1, 2024	Annual Report (draft/final/ upload by LRO)	
May 2024	Due JUNE 5, 2024	SERP (annual review/assess effectiveness/update)	
August 2024	End of 3-Year Audit Period: AUGUST 2, 2024	SSMP 3-Year Audit (initiate audit/draft report)	
January 2025	Due FEBRUARY 2, 2025	SSMP 3-Year Audit (final report/certify/upload by LRO)	
October 2024	No deadline. Initiate at Audit report completion.	2025 SSMP Update (initiate review/draft new SSMP)	
July 2025	Due AUGUST 2, 2025	2025 SSMP Update (final report/certify/upload by LRO)	
Jan 2025	Due FEB 1, 2025	Cat 4 / non-Cat 1 Laterals Spills (<50 gallons)	
March 2025	Due APRIL 1, 2025	SERP (review/update prior to completing Annual Report)	
March 2025	Due APRIL 1 2025	Annual Report (draft/final/ upload by LRO)	
May 2025	Due JUNE 5, 2025	SERP Annual Review/assess effectiveness/update	
July 2025 – Dec 2025	Due DEC 31, 2025	Electronic Sanitary Sewer System Service Area Boundary Map	



Sewer System Management Plan Audit

Attachment B. Common General Order Violations

COMPONENT	GENERAL ORDER REFERENCE SECTION	COMMON VIOLATIONS ¹
Element 1: Goal & Introduction	<ul style="list-style-type: none"> • Attachment D.1 • Spec. 5.2 	<ul style="list-style-type: none"> • Failure to identify appropriate goals. • Failure to establish necessary funding, staffing, capital resources for sewer program. • Failure to update SSMP sub-elements. • Failure to maintain SSMP Change Log. • Failure to establish process to ensure public has access/input to SSMP. • Failure to complete appropriate SSMP audits. • Failure to measure effectiveness and progress. • Failure to develop and implement procedures for updating sewer maps. • Failure to provide appropriate narrative descriptions describing procedures for prioritization of system repairs and maintenance to prevent spills. • Failure to describe technologies and practices to reduce spills.
Element 2: Organization	<ul style="list-style-type: none"> • Attachment D.2 • Spec. 5.1 	<ul style="list-style-type: none"> • Failure to designate a qualified Legally Responsible Official with appropriate training and experience. • Failure to establish and update all related necessary responsible staff and lines of authority. • Failure to establish and update agency chain of communication for reporting spills. • Failure to reflect changes in the SSMP Change Log.
Element 3: Legal Authority	<ul style="list-style-type: none"> • Attachment D.3 	<ul style="list-style-type: none"> • Failure to establish proper agency codes, standards, legal agreements, including but not limited to failure to exercise necessary fats, oils, and grease (FOG) control authority for regulating discharges from Food Service Establishments (FSEs), multifamily housing, and residential homes. • Failure to ensure necessary legal authority for accessing flood control channels and easements for ensuring adequate access for spill response and cleanup operations within service area. • Failure to periodically review agency codes, standards, legal agreements, and procedures for ensuring conformance to requirements.
Element 4: Operations and Maintenance Program	<ul style="list-style-type: none"> • Attachment D.4 • Spec. 5.7 • Spec. 5.19 	<ul style="list-style-type: none"> • Failure to establish process to ensure sewer maps are up to date. • Failure to establish and review required maintenance program activities (CCTV, inspections, etc.) • Failure to establish adequate training program for staff and contractors. • Failure to establish equipment inventory including identification of critical spare part(s), including failure to update SSMP Change Log. • Failure to change/adapt operations/maintenance program based on actual results/experience.

¹ Source: BACWA Guide for Developing and Updating of SSMPs, July 2024



Sewer System Management Plan Audit

COMPONENT	GENERAL ORDER REFERENCE SECTION	COMMON VIOLATIONS ¹
Element 5: Design and Performance Provisions	<ul style="list-style-type: none"> Attachment D.5 	<ul style="list-style-type: none"> Failure to establish, implement, and maintain appropriate sewer standards and procedures for inspections, and testing. Failure to enforce instances of noncompliance. Failure to document and substantiate deviations from standards and procedures.
Element 6: Spill Emergency Response Plan	<ul style="list-style-type: none"> Attachment D.6 Spec. 5.12 Attachment E-1 	<ul style="list-style-type: none"> Failure to develop and adapt a Spill Emergency Response Plan that meets all requirements. Failure to test/evaluate emergency procedures including deploying contracted services where necessary. Failure to adequately recover wastewater following a spill event. Failure to ensure supply of adequate critical/identified spare parts/equipment prior to spills. Failure to properly notify appropriate outside agencies/officials. Failure to conduct training/drills/skilled volume estimations for operators required in Attachment D.4.3 Failure to maintain Spill Emergency Response Plan (annually) and note change in the SSMP Change Log.
Element 7: Sewer Pipe Blockage Control Program	<ul style="list-style-type: none"> Attachment D.7 	<ul style="list-style-type: none"> Failure to identify appropriate needs for pipe blockage program. Failure to ensure adequate pipe blockage control enforcement authority. Failure to enforce requirements for instances of noncompliance.
Element 8: System Evaluation, Capacity Assurance, Capital Improvements	<ul style="list-style-type: none"> Attachment D.8 Spec. 5.6 Spec.5.10 	<ul style="list-style-type: none"> Failure to develop and implement system evaluation, capacity assurance, and capital improvement programs. Failure to identify sections holding high degree of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies. Failure to identify system sections located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas. Failure to identify assets within the vicinity of receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List. Failure to develop and implement capital improvement plan (CIP) for necessary sewer system repairs and improvements (short term and long-term). Failure to include input from field staff regarding known system problems. Failure to document changes and reason(s) for changes in SSMP Change Log.
Element 9: Monitoring, Measurement, Program Modifications	<ul style="list-style-type: none"> Attachment D.9 Spec. 5.11 	<ul style="list-style-type: none"> Failure to collect/maintain and evaluate relevant data for monitoring, measuring, and assessing preventive maintenance program effectiveness. Failure to update/modify agency SSMP based on results from internal audits and evaluate/adapt data required for this element. Failure to document changes in SSMP Change Log.
Element 10: Internal Audits	<ul style="list-style-type: none"> Attachment D.10 	<ul style="list-style-type: none"> Failure to conduct routine SSMP audits at a minimum frequency of every three years.



Sewer System Management Plan Audit

COMPONENT	GENERAL ORDER REFERENCE SECTION	COMMON VIOLATIONS ¹
		<ul style="list-style-type: none"> • Failure to measure SSMP element effectiveness (a simple checklist will not fulfill this obligation). (For specific examples of self-audit compliance/noncompliance, visit the following link: https://bacwa.org/wp-content/uploads/2011/12/BACWA_SSMP-Audits_OE_ppt-12-08-11.pdf) • Failure to implement identified deficiencies/recommendations and commit to new enhancements via a plan/schedule (short and long-term). • Failure to upload and certify the audit report in CIWQS, notify the appropriate Regional Water Board for instances where Audits were not performed, or timelines met, or certify/upload an Audit Report as required.
Element 11: Communication	<ul style="list-style-type: none"> • Attachment D.11 	<ul style="list-style-type: none"> • Failure to develop and implement a public communication program, especially during emergencies. • Failure to solicit input on SSMP content. • Failure to communicate with owners/operators of sewer system(s) connected to the agency's sewer system. • Failure to document how communications were performed. • Failure to regulatory communicate and document communications with stormwater conveyance system owners within agency service area.



Sewer System Management Plan Audit

Attachment C. System Information

Item	Information/Quantity					Comments
WDID	5SSO11466					
Miles of gravity sewer	174 miles					
Miles of force main	3.5 miles					
Total miles of sewer	177.5 miles					
Number of lift stations	24					
Number of manholes, cleanouts, and lampholes	6,190					
Population (US Census 2022 Estimate)	Total	S	K	F		
	44,197	24,430	12,613	7,154		
Service Connections	11,870					
Residential	11,395					96%
Commercial	475					4%
Industrial	< 1%					Count is included in Commercial



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Attachment D. Maintenance Records

SSOs per year	Total	S	K	F	PLSD	Comments
2014	2	1	0	0	*1	* Foster Farms Kingsburg PLSD
2015	1	1	0	0	0	LIFT STATION FORCE MAIN /CONTRACTOR ERROR
2016	1	1	0	0	0	INTERCEPTOR / CONTRACTOR ERROR
2017	2	*1	1	0	0	*SEWER PLANT HEADWORKS ARCHIMEDEAN SCREWS FAIL
2018	2	1	1	0	0	ONE SSO SEWER PLANT HEADWORKS GATE VALVE FAIL
2019	0	0	0	0	0	ZERO SSOs
2020	1	0	0	1	0	Three Crowns Industrial Park Fresno/Fowler MAIN LINE
2021	2	1	0	*1	0	*Lift Station Force Main Broken by contractor
2022	3	*1	1	*1	0	*Lift Station Force Main failures
2023**	2	*1	0	1	0	*Lift Station Force Main Broken by Selma Unified Ag Field ** Through June
Total	16	9	2	4	1	
Number of SSO/100 Mile of Pipe	Total					Comments
2014	0.56					Does not include PLSD
2015	0.56					
2016	0.56					
2017	1.13					
2018	1.13					
2019	0					
2020	0.56					
2021	1.13					
2022	1.69					
2023**	1.13					** Through June



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SSO Volume	Volume Spilled (gal)	Volume Recovered (gal)	Volume That Reached Storm Drains (gal)	Volume That Reached Surface Water (gal)	per 1,000 People Served (gal/1,000 capita/yr)	Comments
2014	575	575	250	250	13	
2015	500	500	500	0	11	
2016	100	75	0	0	2	
2017	71,523	60,818	0	0	1,618	
2018	501	143	0	0	11	
2019	0	0	0	0	0	
2020	193	193	0	0	4	
2021	154	154	0	0	3	
2022	1,249	1,249	0	0	28	
2023**	3,919	3,919	0	0	0	** Through June
Total	78,714	67,626	750	250		



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Service Call Information	Total	S	K	F	PLSD	Comments
2014	153	99	28	26	*47	*PLSD included in the total count of service calls
2015	138	67	35	36	*40	*PLSD included in the total count of service calls
2016	152	90	27	35	*45	*PLSD included in the total count of service calls
2017	161	76	38	47	*36	*PLSD included in the total count of service calls
2018	130	89	19	22	*31	*PLSD included in the total count of service calls
2019	132	89	20	23	*26	*PLSD included in the total count of service calls
2020	144	99	18	27	*41	*PLSD included in the total count of service calls
2021	130	69	28	33	*30	*PLSD included in the total count of service calls
2022	93	60	10	23	*30	*PLSD included in the total count of service calls
2023**	73	38	21	14	*18	*PLSD included in the total count of service calls ** Through June
Total	1,306	776	244	286	344	
Odor Complaints	Total	S	K	F		Comments
2014	4	3	0	1		
2015	10	3	4	3		
2016	4	3	0	1		
2017	3	2	0	1		
2018	2	2	0	0		
2019	6	3	1	2		
2020	1	0	0	1		
2021	3	3	0	0		
2022	3	1	0	2		
2023**	1	0	0	1		** Through June
Total	37	20	5	12		



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Hydro Cleaning (LF)	Total	S	K	F	SKF	Comments
2014	439,869	132,014	88,902	97,496	*121,457	* SKF trouble spot HC
2015	457,288	188,314	118,383	14,477	*136,114	* SKF trouble spot HC
2016	483,188	157,593	90,212	103,248	*132,135	* SKF trouble spot HC
2017	480,969	190,847	122,955	14,477	* 152,690	* SKF trouble spot HC
2018	488,284	158,443	90,212	77,331	*162,298	* SKF trouble spot HC
2019	480,638	182,785	107,102	15,116	*175,635	* SKF trouble spot HC
2020	524,296	166,559	91,626	103,248	*162,863	Hansen Offline June 2020
2021	560,614	213,645	132,882	35,008	*179,079	* SKF trouble spot HC
2022	607,831	209,694	100,493	111,966	*185,678	* SKF trouble spot HC
2023**	432,443	156,399	94,910	47,734	*133,400	* SKF trouble spot HC ** Through June
Total	4,955,420	1,756,293	1,037,677	620,101	1,541,349	



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CCTV (LF)	Total	Comments
2014	Limited CCTV, District does not keep statistics	
2015	Limited CCTV, District does not keep statistics	
2016	Limited CCTV, District does not keep statistics	
2017	Limited CCTV, District does not keep statistics	
2018	Limited CCTV, District does not keep statistics	
2019	Limited CCTV, District does not keep statistics	
2020	Limited CCTV, District does not keep statistics	Estimated 9 miles from 2020-2022
2021	Limited CCTV, District does not keep statistics	
2022	Limited CCTV, District does not keep statistics	
2023**	Limited CCTV, District does not keep statistics	** Through June
Total		
FOG Inspections	Total	Comments
2014-2023	District does not have a FOG inspection program	



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Attachment E. Spill Data Summary 2014 - 2022

SPILL ID	CERT PERSON NAME	SPILL CREATED DATE	SPILL TYPE	SPILL VOL REACH LAND	SPILL VOL	SPILL VOL RECOVER	SPILL VOL REACH SURF	REACH_SURFACE	REACH STORM DRAINPIPE	RETURN TO SSS	SPILL LOC NAME
802545	Rafael Gonzales	1/8/2014	Category 3	75	75	75	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	2860 Logan Street
803743	Rafael Gonzales	2/11/2014	Category 1	0	500	500	250	Yes	Yes	Yes	1200 Kern Kingsburg, Ca 93631
815356	Rafael Gonzales	5/20/2015	Category 3	0	500	500	0	No	Yes	Yes	Dockery & Betty In Selma
821673	Rafael Gonzales	2/2/2016	Category 3	100	100	75	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	McCall and Kamm in Selma
839738	Rafael Gonzales	9/7/2017	Category 2	71423	71423	60718	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	15511 S McCall Ave
843246	Rafael Gonzales	12/28/2017	Category 3	100	100	100	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	1780 1/2 20th Ave
845763	Rafael Gonzales	3/16/2018	Category 3	256	256	143	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	15998 S McCall Ave
845972	Jimmy Floyd	3/28/2018	Category 3	245	245	0	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	2025 Grant St. Selma CA 93662
869357	Rafael Gonzales	10/1/2020	Category 3	193	193	193	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	4065 E. Therese Fowler CA.
877120	Rafael Gonzales	10/26/2021	Category 3	50	50	50	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	2711 Logan between Stillman & Merced Selma
877648	Rafael Gonzales	11/19/2021	Category 3	104	104	104	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	990 Adams Avenue Fowler, Ca 93625
880652	Rafael Gonzales	4/14/2022	Category 3	171	171	171	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	3005 McCall Avenue / Selma, Ca
881188	Rafael Gonzales	5/12/2022	Category 3	946	946	946	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Clarkson Ave.
881343	Rafael Gonzales	5/24/2022	Category 3	132	132	132	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Peach Street Lift Station, 301 West Peach St.
888291	Rafael Gonzales	5/17/2023	Category 3	429	429	429	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	Selma Unified Ag, Feild
888629	Rafael Gonzales	6/5/2023	Category 2	3490	3490	3490	0	No	No	Not Applicable - Spill did not reach a separate storm drainpipe	4065 Therese



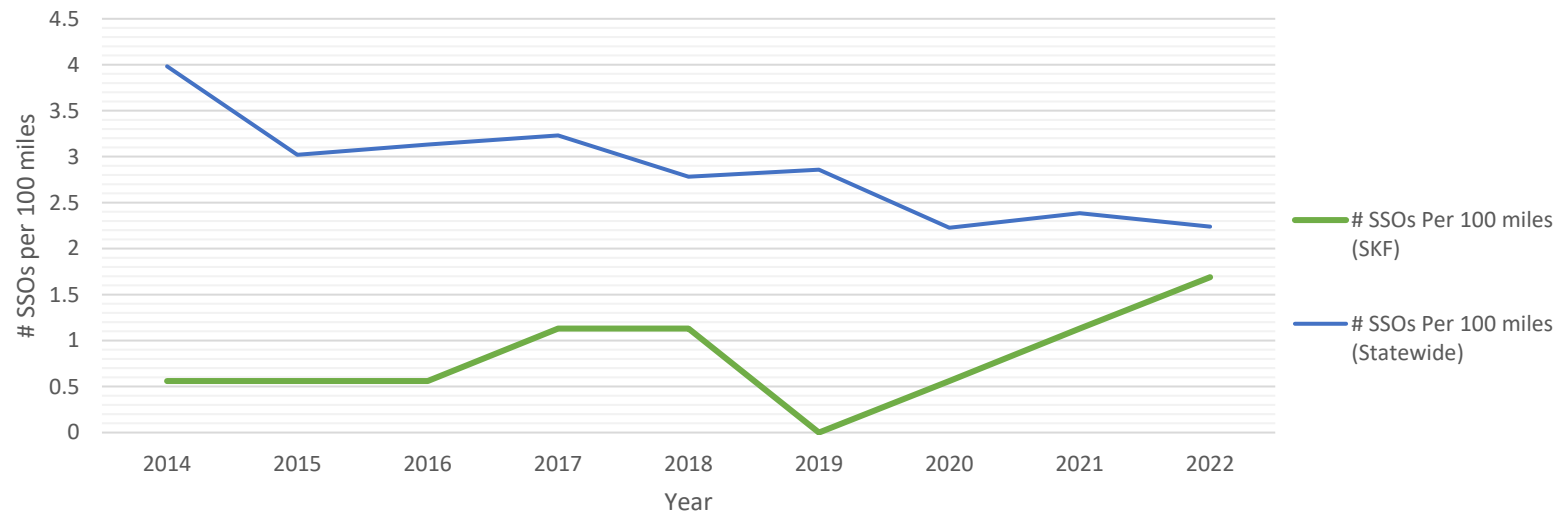
Sewer System Management Plan Audit

Attachment F. Key Performance Indicators

SSO Data, District compared to Statewide data for similar size districts (100-199 miles of sewer)

Category	Years	State (100-199 miles of sewer)	District	% District Relative to State	Comments
SSOs per 100 miles	2022	2.2	1.7	75%	
	2014-2022 Annual Average	2.9	0.8	28%	
SSO Volume Spilled per 1,000 people (gal/1,000 capita/yr)	2022	55	28	50%	
	2014-2022 Annual Average	184	188*	102%*	* 90.7% of all spill volume from a single spill

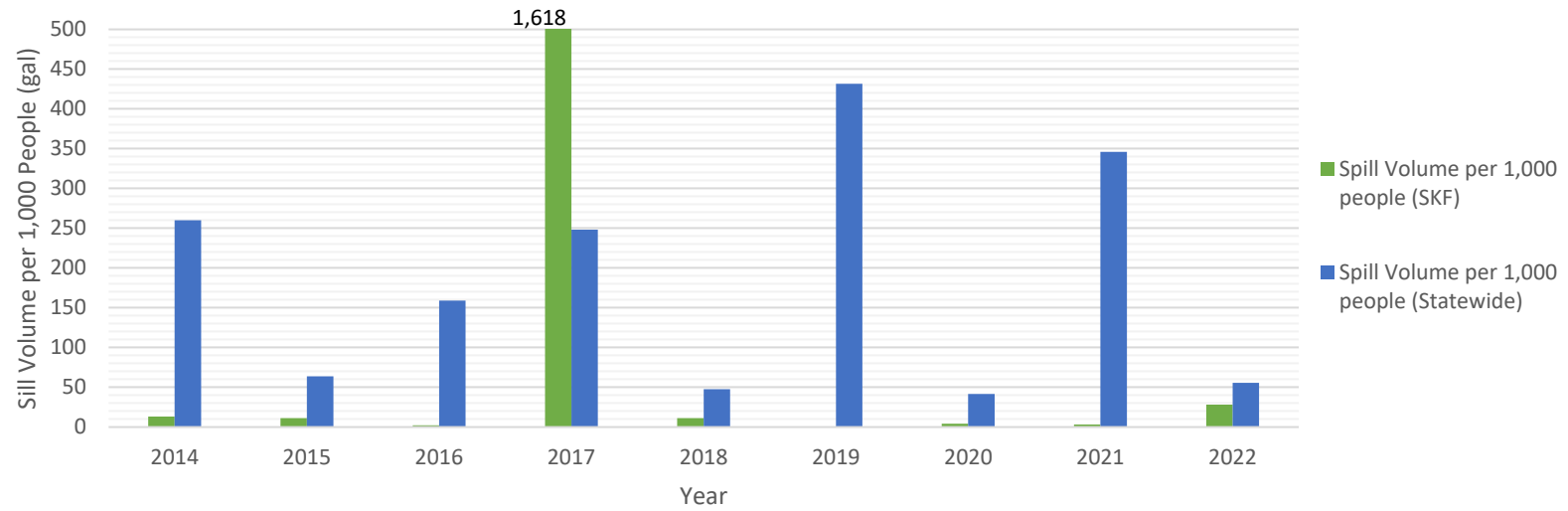
District and State, number of SSOs per 100 miles, 2014-2022





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District and State, spill volume per 1,000 people, 2014-2022





Sewer System Management Plan Audit