Sewer System Management Plan (SSMP) Audit Report

8/2/2021 to 8/2/2024

Sanitary Sewer Collection System

Waste Discharge ID (WDID): #2SSO10665

REVIEWED AND APPROVED BY:

Patricia Mairena

Patricia Mairena, General Manager
Legally Responsible Official

Westborough Water District
Sanitary Sewer Collection System

PREPARED BY:

October 1, 2025

Date Signed

FISCHER COMPLIANCE LLC
PRACTICES THAT COMPLY

CERTIFICATE
OF COMPLETION

August 2, 2021, to August 2, 2024

SEWER SYSTEM MANAGEMENT PLAN AUDIT

- *Regulatory review, agency expectations and compliance best practices*
- *Regional Water Quality Control Board inspector expectations*
- *Completion of State Water Board Pre-Inspection Questionnaire*
- *Completion of Compliance Evaluation Inspection (CEI)*
- *Findings/Best Practice Recommendations for further improving agency program effectiveness, compliance, and resilience*

James Fischer

James Fischer, PE
NPDES Compliance Inspector

September 10, 2025

Westborough Water District
Att: Patricia Mairena, General Manager, Legally Responsible Official (LRO)
2263 Westborough Blvd
South San Francisco, CA 94808

Dear Patricia,

We are pleased to present the 2021-2024 Sewer System Management Plan (SSMP) Audit Report for the District. The Audit meets and exceeds compliance with the Reissued WDR (State Water Board, Water Quality Order No. 2022-0103-DWQ, Attachment D-10 and Specifications 5.4). The Audit shed light on many existing and successful best practices and presents additional areas to address with the Reissued WDR.

Detailed desktop and field reviews incorporating USEPA/Water Board Compliance Evaluation Inspection (CEI) procedures, including comprehensive interviews with management and field staff were relied upon for generating the Audit findings and best practice recommendations. With completion of the Audit, the District becomes one of the few leading systems to be comprehensively evaluated under the Reissued WDR ahead of the required deadline.

We recommend utilizing the SSMP Audit developed in checklist format as a fully customized roadmap for improving SSMP compliance, implementation, and effectiveness including completion of Appendix 3 (SSMP Implementation Plan/Schedule) for addressing all necessary improvements to help reduce spills and potential enforcement exposure.

We look forward to providing ongoing Reissued WDR compliance support for the District as necessary.

Sincerely,

James Fischer

James Fischer, P.E.
Principal, Credentialed U.S. EPA NPDES Compliance Inspector

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LIST OF ACRONYMS

Acronym	Description/Reference Hyperlinks
CEI	Compliance Evaluation Inspection
CIP	System Evaluation, Capacity Assurance/Capital Improvement Program (SECAP), Att. D-8
CIWQS	California Integrated Water Quality System
DS	Data Submitter (DS) registered with State Water Board
FOG	Fats, Oils and Grease (FOG) Control Program (Reissued WDR)
LRO	Legally Responsible Official (LRO) registered with State Water Board
NMMRP	Notification, Monitoring, Reporting, Record Keeping (NMRR), Att. E-1
SECAP	System Evaluation, Capacity Assurance/Capital Improvement Program (SECAP), Att. D-8
O/M	Operations and Maintenance Program (O/M)
SERP	Spill Emergency Response Plan (SERP)
SSMP	Sewer System Management Plan (SSMP)
SWRCB	State Water Resources Control Board (SWRCB)
Waters of the State	Any water, surface or underground, including saline waters, within the boundaries of California. In case of a sewage spill, storm drains are considered to be waters of the State unless the sewage is completely contained and returned to the sewer system; Aug also be referred to as surface water(s) or State waterway

PART 1 – EXECUTIVE SUMMARY

The Westborough Water District (District) is charged with complying the State Water Resources Control Board (SWRCB) General Reissued Waste Discharge Requirements (WDR) for Sanitary Sewer Systems (“Reissued WDR”, Order No. 2022-0103-DWQ). The Reissued WDR replaced the original 2006 WDR (Order No. 2006-003-DWQ and its Monitoring and Reporting Program, Order No. 2013-0058-EXEC), which became effective on June 5, 2023.

The Reissued WDR requirements are the strictest sewer regulations in the country requiring a proactive approach for operations, maintenance, and management of sanitary sewer collection system to reduce or eliminate sewer spills. Attachment D-10 of the Reissued WDR requires periodic SSMP Audits to be completed by the District at least every three years.

To comply with the SSMP Audit requirements, Fischer Compliance LLC in collaboration with District management completed the Sewer System Management Plan (SSMP) Audit covering Aug 2, 2021, through Aug 2024 (due to CIWQS no later than 6 months, by 2/2/2025). The District missed the initial Audit deadline however alerted the San Francisco Regional Water board to inform them that the Audit is being completed by Fischer Compliance LLC which will be finalized and uploaded to CIWQS by the end of September 2025.

> This Audit report meets and exceeds the minimum requirements specified in the Reissued WDR (Attachment D-10 and Specifications 5.4), scaled to the size/complexity of the District’s sewer system. This includes evaluating the SSMP implementation and effectiveness, compliance with the Reissued WDR, and identifying deficiencies in addressing ongoing spills.

REGULATORY BACKGROUND

2006 WDR:

To provide a consistent, statewide regulatory approach to address sewage spills, the State Water Resources Control Board (State Water Board) adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003 (SSS WDRs), on Aug 2, 2006. All public agencies that own or operate a sanitary sewer system that is comprised of more than one mile of pipes or sewer lines that convey wastewater to a publicly owned treatment facility were required to apply for coverage under the Order.

2022 WDR:

The 2006 WDR was rescinded and replaced with a “Reissued WDR” (Order No. 2022-0103-DWQ), adopted on December 5, 2023 which became effective on 6/5/2023. The Reissued WDR updates many aspects of the 16-year-old Order and includes several new requirements for Sewer System Management Plans.

SSMP AUDIT REQUIREMENTS

This section provides details about the SSMP Audit requirements mandated by the Reissued WDR. An SSMP is a spill reduction/mitigation plan that lays the foundation for how an District implements its work programs, assesses effectiveness of its maintenance program, and provides resilience to bounce-back from emergencies, upsets, and scrutiny by regulators conducting a Compliance Evaluation Inspection (CEI) or formal spill investigation.
The Reissued WDR includes the following specific requirements for completion of SSMP Internal Audits:

Specifications 5.4 (Sewer System Management Plan Audits, page 19):

"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."*

Attachment D-10 (Internal Audits, page D-10):

"The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order."

SSMP AUDITING PROCEDURES

A comprehensive SSMP Audit was completed in partnership with managers responsible for providing the auditing team with all data requests and information evaluated in the project. The following key elements were reviewed for compeltion of the Audit:

- Assessment of the District's existing SSMP.
- Detailed interviews with District collection management and field staff operators.
- Completion of a Compliance Evaluation Inspection (CEI) mirroring procedures established and implemented by U.S. EPA and the Water Board staff assessing compliance and taking enforcement for noncompliance with the California Water Code, Federal Clean Water Act, and the Reissued WDR (see Appendix 1)
- Review of District spill reports, system data, and other documentation.
- Guidelines and recommendations for SSMPs (see Appendix 5, incorporated throughout the Audit Report for thoroughness) prepared and published by the Bay Area Clean Water Agencies (BACWA) posted on the SWRCB's website.

COLLECTION SYSTEM INFORMATION

The District provides sewer collection services to the community of Westborough (population approximately 13,486), with a service area of approximately one (1) square mile, located in San Mateo county (See CIWQS information displayed for the system in Figure 3 below for more detail.) The collection system consists of approximately 19 miles of gravity mains, three (3) pump stations, and 0.97 miles of force main sewers. The sewer system does not have siphons or stormwater diversion structures. Service laterals are privately owned. For additional details, see the most current Annual Report in the CIWQS database submitted by the District.

Figure 1 below provides a "Facility-At-A-Glance report providing publicly-available information from the State Water Board's database for the sytem. The purpose of the report is to convey current staffing and present the official regulatory measures information for the colleciton system including identification of historic violations determined by the Regional Water Board, list inspection data and any past enforcement actions.

[VIEW PRINTER FRIENDLY VERSION] [EXPORT THIS REPORT TO EXCEL]

SEARCH CRITERIA: [REFINE SEARCH] [NEW SEARCH] [GLOSSARY]

DRILLDOWN HISTORY: [BACK TO FACILITY LIST]
Place ID **717796**

General Information

Region	Place ID	Place Name	Place Type	Place Address	Place County
2	717796	Westborough CS	Collection_System	2263 Westborough South San Francisco, CA, 94080	San Mateo

Related Parties

Party	Party Type	Party Name	Role	Classification	Relationship Start Date	Relationship End Date
652065	Person	Carlos Arias	Is Onsite Manager For		08/13/2025	
628000	Person	Johnny Kennedy	Is Onsite Manager For		11/03/2021	06/01/2025
628000	Person	Johnny Kennedy	Is A Data Submitter For		10/04/2021	11/12/2021
626782	Person	Patricia Mairena	Is Onsite Manager For		08/16/2021	
539736	Person	Cynthia Royer	Is A Data Submitter For		07/10/2008	10/04/2021
477569	Person	Tom Piccolotti	Is A Data Submitter For		07/10/2008	
477184	Person	Mark Pappas	Is A Data Submitter For		07/09/2008	03/28/2017
374532	Person	Kevin McCarthy	Is A Data Submitter For		07/09/2008	
477192	Person	Robert Donati	Is A Data Submitter For		07/09/2008	03/28/2017
469563	Organization	Westborough Water District	Owner	Special District	05/21/2008	
469567	Person	Darryl Barrow	Is Onsite Manager For		05/21/2008	06/30/2021
Total Related Parties: 11						

Regulatory Measures

Reg Measure ID	Reg Measure Type	Region	Program	Order No.	WDID	Effective Date	Expiration Date	Status	Amended?
345699	Enrollee	2	SSOMUNISML	2022-0103-DWQ	2SSO10665	05/21/2008		Active	N
Total Reg Measures: 1									

Violations

Violation ID	Occurred Date	Violation Type	(-) Violation Description	Corrective Action	Status	Classification	Source
1133881	02/05/2024	SSOS	Type: Category 1 Spill; Pump Station Failure - Controls caused 40170 gallons of sewage to spill from Manhole, Pump Station at Rowntree Lift Station at 2201 Gellert Blvd., South San Francisco, CA 94080 to Drainage Conveyance System that discharges to surface water	Repaired Facilities or Replaced Defect. Repairs are ongoing to electrical panels at lift station. Still trying to obtain and/or update components. District contractor will provide a list of needed equipment for upgrade to be presented to Board of Directors for approval.	Violation	B	SSO
1133880	09/01/2023	SSOS	Type: Category 1 Spill; Fats, Oil and Grease (FOG), Pipe Structural Problem/Failure - Controls caused 632 gallons of sewage to spill from Lower Lateral (Private), Upper Lateral (Private) at 2301 Olympic Drive to Drainage Conveyance System, Paved Surface, Street/Curb and Gutter (2 3)	Adjusted Schedule/Method of Preventive Maintenance, Inspected Sewer Using CCTV to Determine Cause. Main line is currently on Trouble Spots List. Main line was inspected with CCTV on 9/5/23.	Violation	B	SSO

Report displays most recent five years of violations. Refer to the Interactive Violation Report for more data.

Total Violations: 2 **Priority Violations: 0**

*Click the "(+/-) Violation Description" link to expand and contract the violation description.
*As of 5/20/2010, the Water Board's Enforcement Policy requires that all violations be classified as 1, 2 or 3, with class 1 being the highest. Prior to this, violations were simply classified as Yes or No. If a 123 classification has been assigned to a violation that occurred before this date, that classification data will be displayed instead of the Yes/No data.

Violation Types
SSOS = Sanitary Sewer Overflow/Spill/

Enforcement Actions

Enf Id	Enf Type	Enf Order No.	Effective Date	Status
412547	Notice of Violation		01/11/2017	Historical
362625	13267 Letter		12/01/2004	Historical
Total Enf Actions: 2				

Inspections

Inspection ID	Inspection Type	Lead Inspector	Actual End Date	Planned	Violations	Attachment
Total Inspections: 0			**Last Inspection: None**			

Figure 1 – District Facility At-A-Glance report (downloaded from CIWQS on 8/27/25)

SSMP/AUDIT DUE DATES

This section provides an overview of upcoming due dates for the District to update its SSMP and complete its next SSMP Audit. Figure 4 below displays a summary of the upcoming due dates for the District posted on the State Water Board's online Lookup Tool (due 8/2/2025 for its 2025 SSMP Update and by 2/2/25 for its next required SSMP Audit, 6 months after the end of the Audit period shown in the table).

Figure 2 displays the District's upcoming due dates using the State Water Board's lookup tool for required due dates for its next SSMP Update and SSMP Audit as required by the Reissued WDR.

Sewer System Management Plan & Audit Required Due Dates
Transition from General Order 2006-0003-DWQ to Reissued General Order

Search by Waste Discharge Identification (WDID) Number

Enter your Waste Discharge Identification (WDID) number in the search field to retrieve the required Sewer System Management Plan (SSMP) Update and Audit due dates for your system.

2SSO10665

Show Update/Audit Dates

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*
Westborough CS	2SSO10665	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**
Westborough CS	2SSO10665	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.

SPILL PERFORMANCE

This section provides an overview to showcase District spill performance information including trends and benchmarks to allow a comparison of the District's performance against other collection system agencies within the Regional Water Board area and State.

Certified Spills (2007-2024)

- Figure 3 below and Appendix 2A-2C provides information for sewer managers to view their current and historical spill performance and help them compare how they compare with the regional and state spill rates and other collection systems in the region.

SEARCH CRITERIA: [REFINE SEARCH] [NEW SEARCH] [GLOSSARY]
WDID (**2SSO10665**)
Date Range: Start_Date (**08/02/2024**) End_Date (**08/02/2025**)

DRILLDOWN HISTORY: [GO BACK TO LISTING OF COLLECTION SYSTEMS]
Westborough CS
Agency: Westborough Water District

General Information

Region	Place ID	Place Name	CS Category	Place Address	Place County
2	717796	Westborough CS	Municipal(Public)	2263 Westborough South San Francisco CA 94080	San Mateo

Collection System Spill Summary

Operational Indices: Westborough CS

Spill Rate Indice (spills/100mi/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Westborough CS	0.0	0.0	0.0	0.0	0.0	15.0	0.0
State Municipal(Public) Average	3.47	20.38	6.57	2.91	0.57	3.15	0.5
Region Municipal Average	2.24	1.36	0.74	1.59	0.45	3.12	0.25

Net Volume Spills Indice (gallons/1000 Capita/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Westborough CS	0.0	0.0	0.0	0.0	0.0	0.0	0.0
State Municipal(Public) Average	3525.83	17.66	3418.94	798.48	0.19	25.01	7.49
Region Municipal Average	4285.53	56.3	577.14	299.92	0.0	8.49	0.72

Figure 3 - District historic spill performance (2021-2024)

SSMP AUDIT FINDINGS

This section provides a high-level summary of the SSMP Audit findings (see Tables 1 and 2 below) for incorporation into the District's 2025 SSMP Update. The summary provides quick-rererence details to all key Audit findings for management and staff to facilitate implementation for addressing all identified violations and areas of concern with the Reissued WDR.

SSMP AUDIT FINDINGS (ATTACHMENTS)							
WDR Reqs.	**Best Practices?**		**Violations?**		**Areas of Concern?**		**Findings** (see Analysis/Findings below)
Att. D-1 (Goals)	0	0		2		0	• 2 Class B violations (Regional Board).
Att. D-2 (Org.)		1	0	0		2	• Competent outside contracted service provider (Daly City). • Improve existing contract agreement (organizational responsibilities/duties).
Att. D-3 (Legal)	0	0	0	0		1	• Improve easement agreement/enforceability.
Att. D-4 (O/M)	0	0	0	0		4	• Complete periodic updates to governing board on performance of outside contract agreement/services. • Improve training/inspection documentation. • Improve safety railings at Rowntree Pump station.
Att. D-5 (Design)	0	0	0	0		0	• None.
Att. D-6 (SERP)	0	0	0	0		2	• Improve outside contract agreement/update Spill Emergency Response Plan (SERP) & procedures. • Modify SERP to require outside contracted services to perform required Cal/OES notifications for spills.
Att. D-7 (Blockage)	0	0	0	0		1	• Improve outside contract agreement for FOG services/inspection documentation.
Att. D-8 (SECAP)	0	0	0	0		1	• Improve outside contract agreement for CCTV. • Consider new Climate Resilience Plan.
Att. D-9 (Monitoring)	0	0	0	0	0	0	• None.
Att. D-10 (Audits)	0	0		1	0	0	• Failure to complete last SSMP Audit.
Att. D-11 (Comm.)	0	0	0	0		1	• Improve mutual assistance efforts/documentation.
Att. E1 (NMRR)	0	0	0	0		0	• Require outside contracted services to perform required Cal/OES notifications for spills.
Totals		1		3		13	See all Individual Elements below for details

Table 1 - Summary of SSMP Audit Findings (Reissued WDR, ATTACHMENTS)

AUDIT CONCLUSIONS

The SSMP Audit completed by Fischer Compliance LLC in collaboration with District management and field operations staff shed light on many existing successful work programs in place and includes identified violations and areas of concern with the Reissued WDR which must be addressed to reduce potential enforcement liability/exposure for the District. When comparing the District spill data/metrics performance with other collection systems in the region, the District performs well.

Detailed Auditing procedures incorporating review of questionnaires, the District's existing SSMP, interviews and other data were relied on for generating the detailed Audit findings for documenting the District's SSMP compliance, implementation, and effectiveness. To facilitate the project and improve effectiveness of the Audit process, the District dedicated an internal staff person for managing the project, responding to questions/data requests, and provide regular communications to auditors in every phase of the project.

Several specific technical recommendations along with an implementation plan/schedule were generated for helping the District improve its adopted 2025 SSMP Update. The Audit also revealed several areas to provide an advantage to help prepare the District for regulatory compliance inspections by the Water Boards and also continue improving SSMP effectiveness throughout the next several years to prepare for the next requried internal SSMP Audit due in 2027.

Appendix 1 serves as the heart of the Audit containing a detailed Compliance Evaluation Inspection (CEI) report for supporting all findings and conclusions.

POST-AUDIT RECOMMENDATIONS

The District should complete Appendix 3 (SSMP Audit Findings, Implementation Plan/Schedule) as soon as practical to improve the District's 2025 SSMP Update and help reduce potential enforcement liability exposure for noncompliance with the Reissued WDR.

PART 2 (DETAILED AUDIT FINDINGS)

This section presents each of the major SSMP requirements required in the WDR along with an assessment in a checklist format of the District's compliance, implementation, effectiveness, and resilience. Detailed findings presented were derived from assessing the District's SSMP efforts against the WDR requirements.

The Audit Findings include the following determinations:

- WDR Conformance (Violations)
    - Required items for review/resolution for SSMP Update to avoid potential enforcment
- WDR Conformance (Areas of Concern)
    - Strongly recommended for review/resolution for SSMP Update to avoid future violation(s) and potential enforcement
- Recommendations
    - Suggestions for improving SSMP Update and adding resilience[1] for improving sytsem operations, maintenance, and holding up to outside scrutiny by regulators

This section is intended to be utilized as a checklist by the District to ensure all findings are addressed and incorporated as necessary prior to adoption of the next SSMP Update. This includes a completed checklist of "Violations or Areas of Concern" of the Reissued WDR at the conclusion of each SSMP Element Analysis/Findings in the document. This provides management with a summary of key compliance information specific to each Element distilled from the Appendix 5, including "Yes/No" answers applicable to the District findings for the Audit.

[1] *"Definitions" in section Attachment A of the Reissued WDR (page A-4): "Resilience is the ability to recover from or adjust to adversity or change, and grow from disruptions. Resilience can be built through planning, preparing for, mitigating, and adapting to changing conditions."*

ELEMENT 1 – GOAL AND INTRODUCTION

1.1. REGULATORY CONTEXT REQUIREMENTS[2]

"The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates."

1.2. SSMP UPDATE SCHEDULE REQUIREMENTS

"The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of sewer spills."

1.3. SEWER SYSTEM ASSET OVERVIEW

"The District Sewer System Management Plan must have an Introduction section to provide a description of the District-owned assets and service area including but not limited to.

- *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 Enrollee 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).*
- *Reference to the Enrollee's up to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment."*

[2] *Required under Specification 5.4 of the Reissued WDR (see pages 19-20)*

ANALYSIS AND FINDINGS – ELEMENT 1

SSMP Element - Att. D-1

COMPLIANCE

To improve compliance, the District should address the following key findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE – VIOLATIONS

- ❑ Failure to prevent discharges of sewage to surface waters of the State (2 violations for Category 1 spills, 40,792 gallons reaching surface waters during Audit period, determined to be Class B violations by San Francisco Regional Water Board, defined as not causing immediate or substantial threats to water quality – see State Water Board's 2017 Enforcement Policy for details (page 6).

IMPLEMENTATION

- ❑ Address WDR Conformance above by adjusting goals and improving SSMP implementation to reduce future spills.

WDR RECOMMENDATION

To assess implementation, the District should

- ❑ Annually review Element 1 entirely for ensuring all information is accurate and up to date.

EFFECTIVENESS

WDR RECOMMENDATION

To help measure effectiveness and align with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Has the schedule for conducting audits been adhered to?
- ❑ Has the schedule for updating the Sewer System Management Plan been adhered to?
- ❑ Are established milestones being Monitored?
- ❑ Is the sewer system management program description up to date?
- ❑ Have audits been performed on schedule?
- ❑ Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)?
- ❑ Is asset data kept in the computerized maintenance management system, GIS, etc., programs up to date?
- ❑ Does the sewer system asset overview reference up to date maps?

RESILIENCE

WDR RECOMMENDATION

To help provide resilience, the District should:

- ❑ If not already in place, create a work order report for auditing open work orders and assets for any repeat spill locations.
- ❑ Implement a formal schedule for ensuring all WDR compliance deadlines are logged into management calendars.

ELEMENT 2 – ORGANIZATION

REQUIREMENTS

"The Plan must identify organizational responsible and integral for implementing the local Sewer System Management Plan through an organizational chart of other similar narrative documentation that includes:

- *The name of the Legally Responsible Official as required in section 5.1 (Designation of a Legally Responsible Official) of this General Order.*
- *The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan 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. (For example, county health officer, county environmental health District, and State Office of Emergency Services)."*

ANALYSIS AND FINDINGS (ELEMENT 2)

SSMP Element Att. D-2

COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE (AREAS OF CONCERN):

- ❑ The inspection revealed the District has competent outside contracted services in place (Daly City).
- ❑ The inspection revealed the District should Improve existing contract agreement (organizational responsibilities/duties).
- ❑ The District should The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address findings.

IMPLEMENTATION

- ❑ Address WDR Conformance above to improve current SSMP implementation deficiencies.

EFFECTIVENESS

WDR RECOMMENDATION

Improve testing (at least annually) and documentation for after-hours spill notification system for 2025 SSMP Update

To help measure effectiveness and align with available industry standard guidance, the District should check/verify the following, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Have there been instances when a service call for a spill was not properly routed to response personnel?
- ❑ Was all spill response activity documented/prepared for LRO?
- ❑ Have there been any changes in assigned responsibilities for implementing the Sewer System Management Plan?
- ❑ Is there a process in place for ensuring all contact information remains up to date?
- ❑ Is a process established for ensuring that org. chart is current?

RESILIENCE

WDR RECOMMENDATION

To provide resilience and align with available industry standard guidance, the District should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Designate more than one LRO to help ensure full and continuous coverage of duties.
- ❑ Ensure more than one staff member can implement and be responsible for specific Sewer System Management Plan elements.
- ❑ Periodically review contact information throughout this element for ensuring data is up to date.

ELEMENT 3 – LEGAL AUTHORITY

REQUIREMENTS [3]

"The District Sewer System Management Plan must include copies or an electronic link to the Enrollee's current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority."

- *"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 cause blockages."*
- *"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."*
- *"Require that sewer system components and connections be properly designed and constructed."*
- *"Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee."*
- *"Enforce violation(s) of ordinances, service agreements, or other legally binding procedures."*
- *"Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable."*

[3] *See Attachment D-3 of* Reissued WDR *(page D-4)*

ANALYSIS/FINDINGS (ELEMENT 3)

SSMP Element - Att. D-3

COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE (AREAS OF CONCERN):

- ❑ The inspection revealed the District should Improve easement agreements/enforceability.
- ❑ The District should The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address finding.

IMPLEMENTATION

- ❑ Address WDR Conformance above to improve current SSMP implementation deficiencies.

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Periodically review District codes and ordinances to ensure they are adequate in fulfilling all required legal requirements.
- ❑ Check for instances when the code/ordinance did not address a specific need/circumstance.

RESILIENCE

WDR RECOMMENDATION

To provide resilience and align with available industry standard guidance, the District should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Monitor performance of ordinances, codes, and agreements for deficiencies and omissions.
- ❑ Perform periodic review of ordinances, codes, and service agreements.
- ❑ Stay abreast of industry trends and local ordinances that Aug affect operations.

ELEMENT 4 – OPERATIONS AND MAINTENANCE PROGRAM

4.1. UPDATED MAP OF SEWER SYSTEM REQUIREMENTS [4]

"The Plan must include the items listed below that are appropriate and applicable to the Enrollee's system.

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). 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."

4.2. PREVENTIVE OPERATION AND MAINTENANCE ACTIVITIES REQUIREMENTS

"A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors.

The scheduling system must include:

- *Inspection and maintenance activities, Higher-frequency inspections*
- *Maintenance of known problem areas including areas with tree root problems*
- *Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.*

The data collection system must document the data from system inspection and maintenance activities, including system areas/components prone to root-intrusion resulting in system backup and/or failure."

4.3. TRAINING REQUIREMENTS

"In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors.

The training must cover the requirements of this General Order; the Enrollee's Spill Emergency Response Plan procedures and practice drills, skilled estimation of spill volume for field operators, and electronic CIWQS reporting procedures for staff submitting data."

4.4. EQUIPMENT INVENTORY REQUIREMENTS[1]

"An inventory of sewer system equipment, including identification of critical replacement/spare parts."

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[4] *See Attachment D-4.1 of* Reissued WDR *(page D-4)*

ANALYSIS AND FINDINGS (ELEMENT 4)

SSMP Element - Att. D-4

COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE (AREAS OF CONCERN):

- ❑ The inspection revealed the District should consider completing ongoing periodic updates to governing board on performance of outside contract agreement/services.
- ❑ Improve training documentation.
- ❑ Improve manhole inspection documentation.
- ❑ Improve safety railings at Rowntree Pump station.
- ❑ The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address findings.

IMPLEMENTATION

- ❑ Address WDR Conformance above to improve current SSMP implementation deficiencies.

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Were all map updates completed in a timely manner?
- ❑ Are staff trained to provide map update information?
- ❑ Are newly installed assets incorporated into maps?
- ❑ Are District maintenance, operations, engineering work orders periodically reviewed for completeness?
- ❑ Does the District monitor "open" or "overdue" work orders?
- ❑ Are inspection and maintenance activities reducing the number and volume of spills?
- ❑ Is maintenance work being completed as scheduled?
- ❑ Are inspections of pipes, manholes, and lift stations being completed?
- ❑ Does the District have a proactive root control program?
- ❑ Has all training been completed as scheduled?
- ❑ Have consistent training records been maintained?
- ❑ Have staff demonstrated ability/knowledge after training?
- ❑ Have contractors received, at a minimum, directions for 1) reporting spills, containment, securing sites?
- ❑ Has the inventory list been audited as scheduled?
- ❑ Have any inventory deficiencies or omissions been discovered?

RESILIENCE

WDR RECOMMENDATION

To provide resilience and align with available industry standard guidance, the District should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Develop a Standard Operating Procedure (SOP) for updating maps when errors are discovered.
- ❑ Develop and use forms (paper or electronic) for data collection through inspections to ensure all pertinent information is consistently collected.
- ❑ Periodically evaluate inspection intervals to help ensure they are optimized.
- ❑ Require staff to demonstrate ability and/or knowledge for all training activities.
- ❑ Monitor equipment and critical spare parts usage for and trends.
- ❑ Ensure cross-training for CIWQS Data Submitters for ensuring more than one staff member can collect/manage all required spill data and meet all required deadlines specified in Attachment E1 of the Reissued WDR.

ELEMENT 5 – DESIGN AND PERFORMANCE PROVISIONS

5.1. UPDATED DESIGN CRITERIA AND CONSTRUCTION STANDARDS REQUIREMENTS [5]

"The Plan must include the following items as appropriate and applicable to the Enrollee's system."

"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. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic Capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria."

5.2. PROCEDURES AND STANDARDS REQUIREMENTS

"Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances."

[5] *See Attachment D-5.1 of* Reissued WDR *(page D-5)*

ANALYSIS AND FINDINGS (ELEMENT 5)

SSMP Element Att. D-5

COMPLIANCE

- ❑ None.

IMPLEMENTATION

- ❑ None

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Does the District implement its current design and construction standards, specifications, and inspection procedures?
- ❑ Does the District periodically review design and construction standards, specifications, and inspection procedures for ensuring conformance to requirements?
- ❑ Does the District have a review process for its standards and procedures?
- ❑ Were any design or installation deficiencies found during warranty inspections?
- ❑ Are hydraulic model findings included in the design process?
- ❑ Does the District stay abreast of industry design standards?

RESILIENCE

WDR RECOMMENDATION

To provide resilience and align with available industry standard guidance, the District should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Staying abreast of industry trends and standards.
- ❑ Performing warranty inspections of newly installed or repaired assets to evaluate design and installation practices.
- ❑ Evaluating as-built changes for trends and areas for design and performance improvements.

ELEMENT 6 – SPILL EMERGENCY RESPONSE PLAN

REQUIREMENTS [6]

"The Plan must include an up-to-date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to meet all the following.

- *"Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a* spill in a timely manner.
- *Notify other affected entities (for example, health agencies, water suppliers, etc.) of spills that affect public health or reach waters of the State.*
- *Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders.*
- *Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained.*
- *Address emergency system operations, traffic control and other necessary response activities.*
- *Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system.*
- *Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State.*
- *Remove sewage from the drainage conveyance system.*
- *Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters.*
- *Implement technologies, practices, equipment, and interDistrict coordination to expedite spill containment and recovery.*
- *Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event.*
- *Conduct post-spill Guidance of spill response activities.*
- *Document and report spill events as required in this General Order.*
- *Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the* Plan as needed."

[6] *See Attachment D-6 of* Reissued WDR *(page D-6)*

ANALYSIS AND FINDINGS (ELEMENT 6)

SSMP Element - Att. D-6

COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE (AREAS OF CONCERN):

- ❑ Improve outside contract agreement/update Spill Emergency Response Plan (SERP) & procedures.
- ❑ Modify SERP to require outside contracted services to perform required Cal/OES notifications for spills.
- ❑ The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address findings.

IMPLEMENTATION

- ❑ Address WDR Conformance above to improve current SSMP implementation deficiencies

WDR RECOMMENDATION

- ❑ Refer to Compliance recommendations above for further improving implementation.

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Check to ensure the District is implementing all recommendations for spill emergency response plans incorporated in SSMP Guidance Manual (see pages 35-39) including appropriate field data collection for spills to comply with Att. E1.
- ❑ Does the District implement an effective Spill Emergency Response Plan?

RESILIENCE

WDR RECOMMENDATION

To provide resilience and align with available industry standard guidance, the District should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Provide training on a regular basis for all spill response staff. Training should include:
- ❑ Determining Spill Start Time
- ❑ Determining spill volume and volume recovered.
- ❑ Data Collection (forms)
- ❑ Containment and clean up.
- ❑ CIWQS Data Submitting
- ❑ Develop a training plan for contracted services.
- ❑ Periodically review post-spill assessments/trends.

ELEMENT 7 – SEWER PIPE BLOCKAGE CONTROL PROGRAM

REQUIREMENTS [7]

"The Sewer System Management Plan must include procedures for the evaluation of the Enrollee's service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags, and debris. If the Enrollee determines that a program is not needed, the Enrollee shall provide justification in its Plan for why a program is not needed. The procedures must include, at minimum:

- *An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances.*
- *A plan and schedule for the disposal of pipe-blocking substances generated within the sanitary sewer system service area. This includes a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of substances generated within a sanitary sewer system service area.*
- *The legal authority prohibits discharges to the system and identifies measures to prevent spills and blockages.*
- *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.*
- *Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the fats, oils, and grease ordinance.*
- *An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and*
- *Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above."*

[7] *See Attachment D-7 of* Reissued WDR *(page D-7)*

ANALYSIS AND FINDINGS (ELEMENT 7)

SSMP Element - Att. D-7

COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

- ❑ Improve outside contract agreement for FOG services/inspection documentation.
- ❑ The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address finding.

IMPLEMENTATION

- ❑ None

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Have there been any blockages/spills from any identified problem area?
- ❑ Is the District receiving feedback on public outreach efforts?
- ❑ Is the debris and other sewage solids collected during cleaning activities being disposed of appropriately?
- ❑ Does the District have a plan and schedule for inspection of grease producing facilities? Was the schedule adhered to?
- ❑ Have there been spills due to excessive fats, oil, or grease in the system?
- ❑ Are Source Control staff included in the plan check process?

RESILIENCE

WDR RECOMMENDATION

To provide resilience and align with available industry standard guidance, the District should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Inspect assets directly downstream of grease producing businesses to ensure source control is effective.
- ❑ Develop outreach doorhangers or flyers to perform targeted outreach when discoveries are made in the field.
- ❑ Perform regular assessments of system assets to monitor performance.
- ❑ Establish a QA/QA process for evaluating pipe cleaning effectiveness.

ELEMENT 8 – SYSTEM EVALUATION, CAPACITY ASSURANCE, CAPITAL IMPROVEMENTS

8.1. REQUIREMENTS

"The Plan must include procedures and activities for

- *Routine evaluation and guidance of system conditions,*
- *Capacity guidance and design criteria.*
- *Prioritization of corrective actions.*
- *Capital improvement plan."*

8.2. SYSTEM EVALUATION AND CONDITION GUIDANCE REQUIREMENTS [8]

"The Plan must include procedures to:

- *Evaluate the sanitary sewer system assets utilizing the best practices and technologies available.*
- *Identify and justify the amount (percentage) of its system for its condition to be assessed each year.*
- *Prioritize the condition Guidance of system areas that:*
- *Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, Capacity issues, or other system deficiencies.*
- *Are 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.*
- *Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods.*
- *Utilize observations/Audit Findings/Recommendations of system conditions that contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State.*
- *Maintain documents and recordkeeping of system evaluation and condition Guidance inspections and activities,*
- *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."*

[8] *See Attachment D-8.1 of* Reissued WDR *(pages D-7 and D-8)*

ANALYSIS AND FINDINGS (ELEMENT 8)

SSMP Element - Att. D-8

COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE (AREAS OF CONCERN):

- ❑ Improve outside contract agreement for CCTV inspection cycle commitments covering system.
- ❑ Consider development of a system-specific Climate Resilience Plan for sewer system including but not limited addressing factors listed in Findings 3.2.3 of the Reissue WDR including:
  - Sea level rise impacts including flooding, coastal erosion, seawater intrusion, tidal inundation and submerged lands
  - Increased surface water flows due to higher intensity rain events.
  - Flooding
  - Wildfires and wildfire induced impacts
  - Earthquake induced damage
  - Landslides
  - Subsidence
- ❑ The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address finding.

IMPLEMENTATION

- ❑ Address WDR Conformance above to improve current SSMP implementation deficiencies

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Track number of Capacity-related spills or surcharge condition during the audit period?
- ❑ Has the system responded to rain events as indicated by the hydraulic model?
- ❑ Has there been any changes to zoning designations (residential, commercial, industrial)?
- ❑ Rain event trends: Has there been changes in rain event occurrences, intensity, and duration?
- ❑ Has the District's capital improvement plan been adhered to?
- ❑ Is there an annual review of the Capital Improvement Plan by all necessary individuals?
- ❑ Has the District adhered to its system evaluation/condition assessment efforts? Measured by annual review and update of system inspections/evaluations procedures.

- [ ] Has the District adhered to its prioritization/corrective actions for sewer repair and Capacity improvement projects? Measured by annual review and District prioritization/corrective actions procedures.

ELEMENT 9 – MONITORING, MEASUREMENT, PROGRAM MODIFICATIONS

REQUIREMENTS [9]

"The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:

- *Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities.*
- *Monitoring the implementation and measuring the effectiveness of each Plan Element.*
- *Assessing the success of the preventive operation and maintenance activities.*
- *Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and*
- *Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes."*

[9] *See Attachment D-9 of* Reissued WDR *(page D-9)*

ANALYSIS AND FINDINGS (ELEMENT 9)

SSMP Element - Att. D-9

COMPLIANCE

- ❑ None.

IMPLEMENTATION

- ❑ None

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Are trends being monitored and corrective action taken as necessary?
- ❑ Have Key Performance Indicators been developed to measure the effectiveness of each Sewer System Management Plan element?
- ❑ Has a plan and schedule been established to address audit findings/deficiencies?
- ❑ Have changes been made to work programs and procedures because of monitoring efforts?

RESILIENCE

WDR RECOMMENDATION

To provide resilience and align with available industry standard guidance, the District should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update:

- ❑ Develop key performance indicators to measure effectiveness of the Sewer System Management Plan.
- ❑ Perform periodic reviews of the Sewer System Management Plan to help ensure the plan is being properly implemented.
- ❑ Develop and adhere to a timeline to correct deficiencies found during the audit process.
- ❑ Periodically evaluate work programs to help ensure effectiveness.

ELEMENT 10 – INTERNAL AUDITS

10.1. REQUIREMENTS [10]

"The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order."

10.2. SPECIFICATIONS (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."*

[10] *See Attachment D-10 of* Reissued WDR *(page D-10)*

ANALYSIS AND FINDINGS (ELEMENT 10)

SSMP Element - Att. D-10

COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE (VIOLATION):

- ❑ Failure to complete last SSMP Audit (2021-2024 by 2/2/2025).
- ❑ The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address finding and add attach Audit report when available.

IMPLEMENTATION

- ❑ The District should assess element narrative and improve as necessary for 2025 SSMP Update

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Have audits been performed as required?
- ❑ Have the audits assessed compliance, implementation, and effectiveness?
- ❑ Have deficiencies been identified?
- ❑ Has a plan and schedule to rectify the deficiencies been established?

RESILIENCE

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Periodically evaluate key performance indicators to assess effectiveness of each Sewer System Management Plan element.
- ❑ Evaluate previous audit findings for ensuring deficiencies have all been addressed/rectified.
- ❑ Calendar the audit due dates and complete the audit on time.
- ❑ Prepare for announced/unannounced compliance inspections by regulators and be proactive with preparing required Audits by completing the State Water Board Pre-Inspection Questionnaire (see Appendix 1).

ELEMENT 11 – COMMUNICATION PROGRAM

REQUIREMENTS [11]

"The Plan must include procedures for the Enrollee to communicate with:

- *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 Plan, including opportunities for public input to Plan implementation and updates.*
- *Owners/operators of systems that connect into the Enrollee's system, including satellite systems, for system operation, maintenance, and capital improvement-related activities."*

[11] *See Attachment D-11 of* Reissued WDR *(page D-10)*

ANALYSIS AND FINDINGS (ELEMENT 11)

SSMP Element - Att. D-11

COMPLIANCE

- ❑ Improve mutual assistance efforts/documentation.
- ❑ The District should assess element narrative in 2025 SSMP Update and adjust as necessary to address finding.

IMPLEMENTATION

WDR RECOMMENDATION

- ❑ None

EFFECTIVENESS

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Does the District place all Sewer System Management Plan action items on the agenda for regular counsel/board meetings?
- ❑ Does the District have signage, or other means, readily available to notify the public of env. or public risk factors related to a sewage spill?
- ❑ Does the District regularly communicate with other systems connected to the system?
- ❑ Was the public afforded the opportunity to provide input as the program was being implemented?
- ❑ Does the District perform outreach to residential customers?

RESILIENCE

WDR RECOMMENDATION

To measure effectiveness and ensure alignment with available industry standard guidance, the District should check/verify the following data for inclusion in its next required SSMP update:

- ❑ Maintain a consistent presence in the service area by attending community events or issuing periodic newsletters or other communications to the public.
- ❑ Make it clear and easy for the public to contact the District.

ATTACHMENT E1 – NOTIFICATION, MONITORING, REPORTING, RECORD KEEPING

REQUIREMENTS [12]

"The Notification Requirements (section 1), Spill-specific Monitoring Requirements (section 2), Reporting Requirements (section 3) and Recordkeeping Requirements (section 4) in this Attachment are pursuant to Water Code section 13267 and section 13383 and are an enforceable component of this General Order.

For the purpose of this General Order, the term:

- *Notification means the notifying of appropriate parties of a spill event or other activity.*
- *Spill-specific Monitoring means the gathering of information and data for a specific spill event to be reported or kept as records.*
- *Reporting means the reporting of information and data into the online California Integrated Water Quality System (CIWQS) Sanitary Sewer System Database.*
- *Recordkeeping means the maintaining of information and data in an official records storage system. Failure to comply with the notification, monitoring, reporting and recordkeeping requirements in this General Order Aug subject the Enrollee to civil liabilities of up to $10,000 a day per violation pursuant to Water Code section 13385; up to $1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement. Water Code section 13193 et seq. requires the Regional Water Quality Control Boards (Regional Water Boards) and the State Water Resources Control Board (State Water Board) to collect sanitary sewer spill information for each spill event and make this information available to the public. Sanitary sewer spill information for each spill event includes but is not limited to: Enrollee contact information for each spill event, spill cause, estimated spill volume and factors used for estimation, location, date, time, duration, amount discharged to waters of the State, response and corrective action(s) taken."*

[12] *See Attachment D-11 of* Reissued WDR *(page D-10)*

ANALYSIS AND FINDINGS (ATTACHMENT E1)

SPILL NOTIFICATION/REPORTING COMPLIANCE

To improve compliance, the District should address the following findings revealed during the Audit prior to completing its 2025 SSMP Update (see Appendix 1).

WDR CONFORMANCE (VIOLATIONS AND AREAS OF CONCERN): Since there is no established legal statute of limitations for sewage spills/enforcement, the Audit incorporates a comprehensive review of all available spill data for the District since the collection system was originally enrolled for coverage by the State Water Board.

<u>The Audit revealed the following specific VIOLATIONS for the District:</u>

- ❑ <u>1 violation</u> (2007-2024) for missing required timelines for 2-hour notification to Cal-OES for Category 1 spills greater than or equal to 1,000 gallons to surface waters.
- ❑ <u>0 violations</u> (2007-2024) for missing required timelines for Certified Spill Reports in CIWQS within 15 calendar days.
- ❑ <u>1 violation</u> for missing month for Spill/No Spill reporting (2007-2024).

<u>The Audit revealed the following specific AREAS OF CONCERN for the District</u>:

- ❑ The District could further improve field documentation including additional details for determination of spill start time, spill volume calculations, and amounts recovered to ensure full compliance with Att. E1 requirements.

<u>Recommendations:</u>

- ❑ To improve compliance, the District should establish/implement customized internal procedures specific to the District for avoiding future notification/reporting violations of the WDR.
- ❑ All improvements to these procedures should be narrated and entered into the District's 2025 SSMP Update.

LIST OF APPENDICES

Westborough Water District

COMPLIANCE EVALUATION INSPECTION (5/28/25)

Prepared by:

FISCHER LLC COMPLIANCE
PRACTICES THAT COMPLY

Sanitary Sewer Collection System

Waste Discharge ID=2SSO10665

Table of Contents

Acronyms

Acronym	Description/Reference Hyperlinks
CEI	Compliance Evaluation Inspection
CIP	System Evaluation, Capacity Assurance/Capital Improvement Program (SECAP), Att. D-8
CIWQS	California Integrated Water Quality System
DS	Data Submitter (DS) registered with State Water Board
FOG	Fats, Oils and Grease (FOG) Control Program (Reissued WDR)
LRO	Legally Responsible Official (LRO) registered with State Water Board
NMMRP	Notification, Monitoring, Reporting, Record Keeping (NMRR), Att. E-1
SECAP	System Evaluation, Capacity Assurance/Capital Improvement Program (SECAP), Att. D-8
O/M	Operations and Maintenance Program (O/M)
SERP	Spill Emergency Response Plan (SERP)
SSMP	Sewer System Management Plan (SSMP)
SWRCB	State Water Resources Control Board (SWRCB)
Waters of the State	Any water, surface or underground, including saline waters, within the boundaries of California. In case of a sewage spill, storm drains are considered to be waters of the State unless the sewage is completely contained and returned to the sewer system; Aug also be referred to as surface water(s) or State waterway

1. FIELD INSPECTIONS (DALY CITY – CONTRACT OPERATIONS)

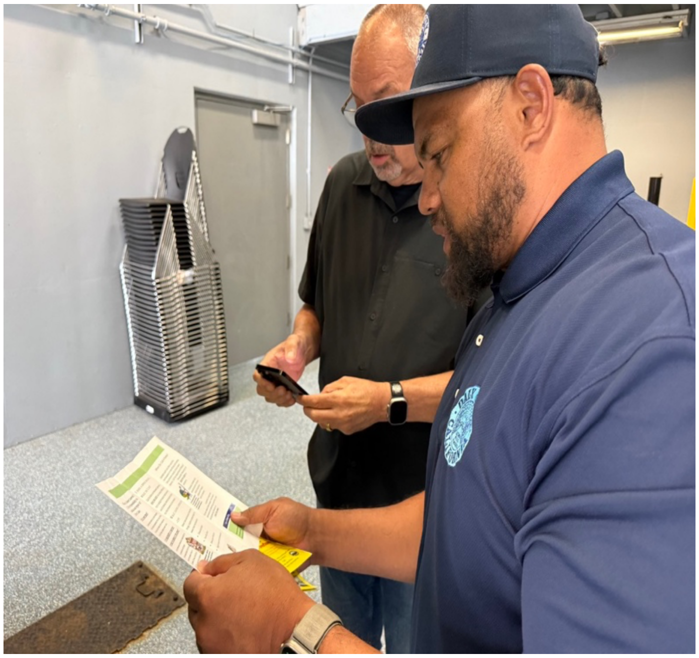


Photo 1: Inspection of Daly City (contracted operations) O/M program.

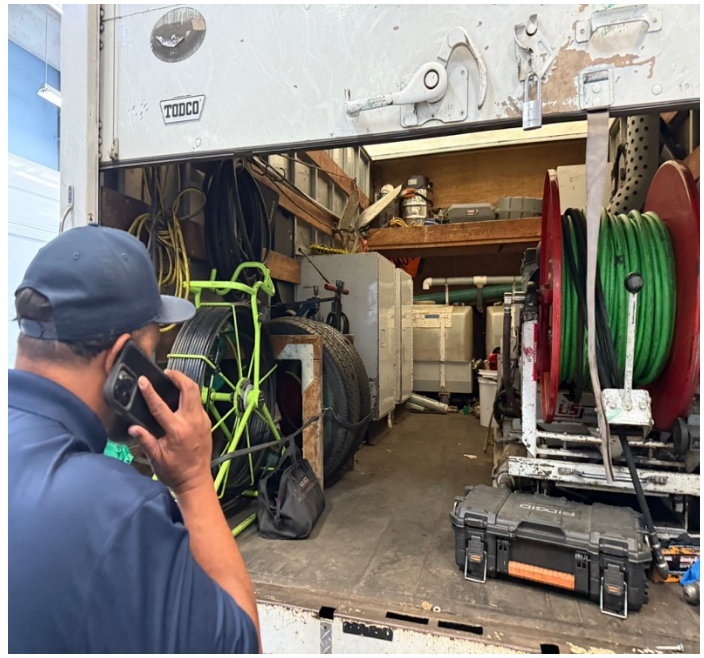


Photo 2: Inspection of Daly City (contracted operations) equipment, backup supplies, and critical part inventory.

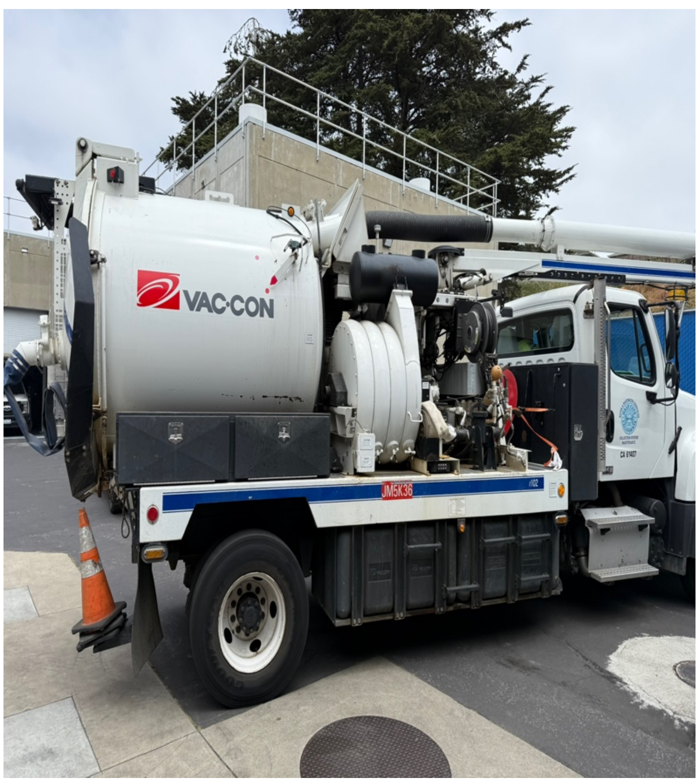


Photo 3: Inspection of Daly City (contracted operations) combination vehicle.

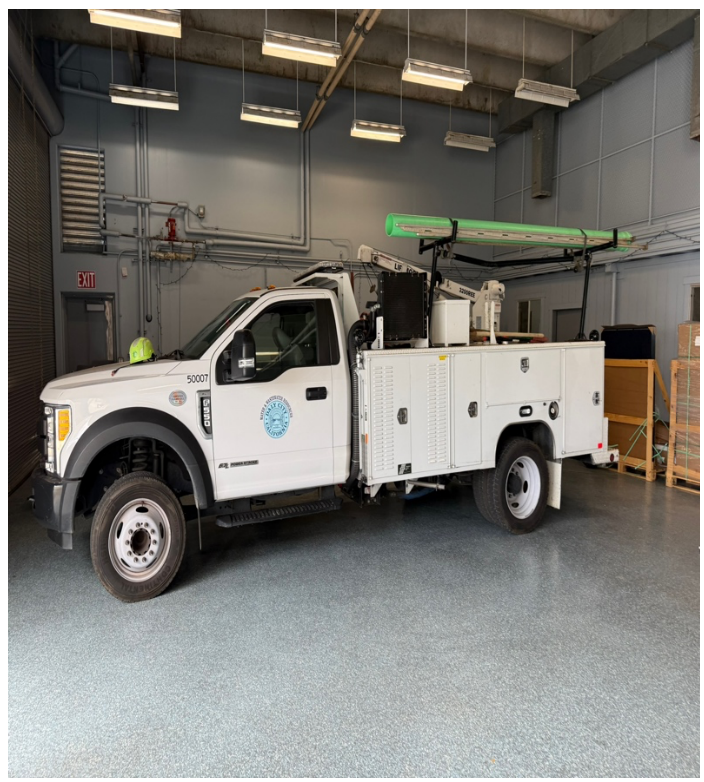


Photo 4: Inspection of Daly City (contracted operations) utility truck.

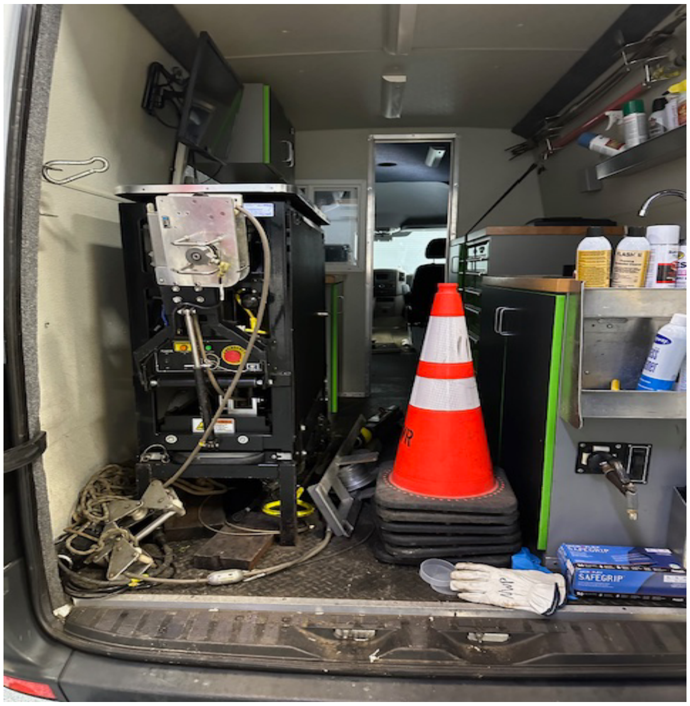


Photo 5: Inspection of Daly City CCTV equipment (view 1).

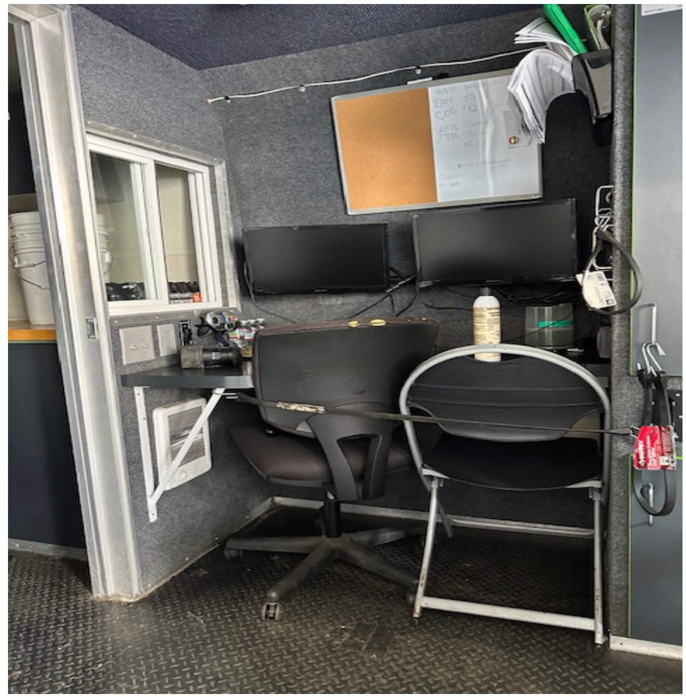


Photo 6: Inspection of of Daly City CCTV equipment (view 2).

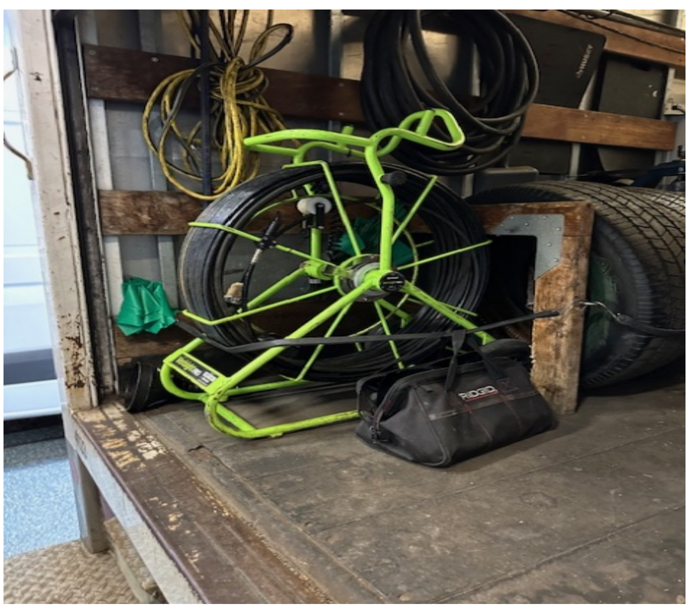


Photo 7: Inspection of of Daly City customer service truck equipped for providing lateral services as a courtesy to ratepayers including lateral jetter, push camera, and pipe locating equipment. Each customer that contacts the City for problems receives this service once and are informed of what the crew's findings are to help resolve problem.

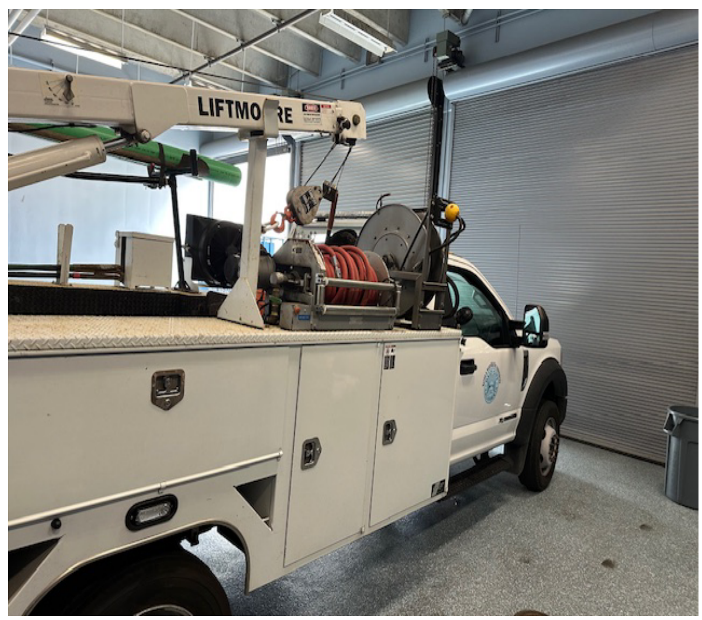


Photo 8: Inspection of of Daly City utility truck.

2. FIELD INSPECTIONS (ROUNDTREE LIFT STATION)

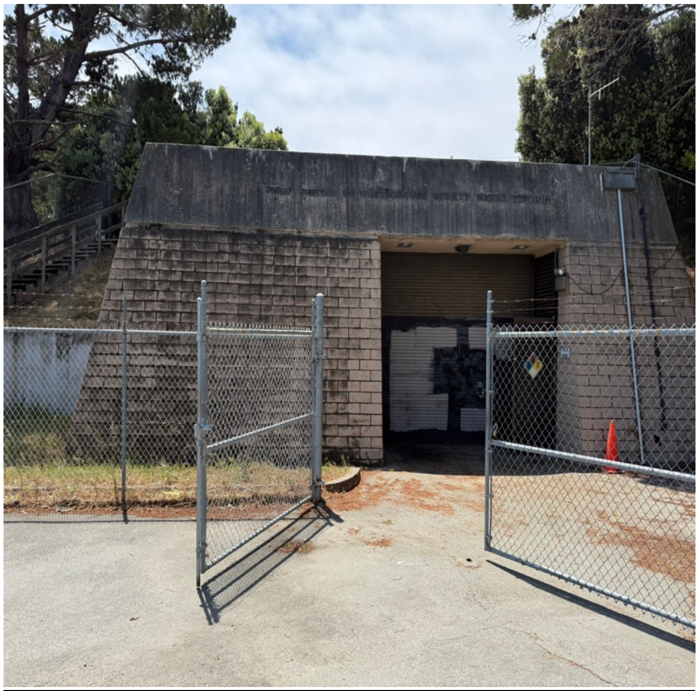


Photo 5: Inspection of Roundtree Lift Station (view 1).

Photo 6: Inspection of Roundtree Lift Station (view 2).

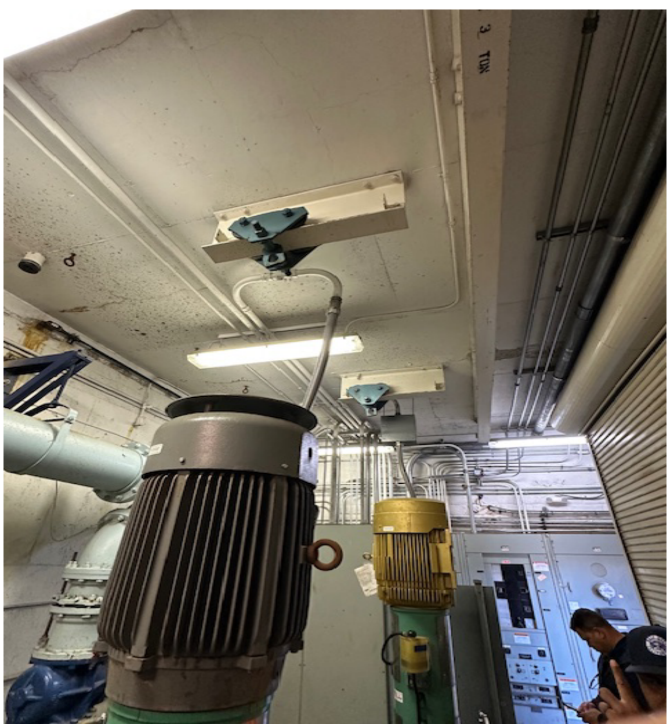


Photo 7: Inspection of Roundtree Lift Station (view 3).

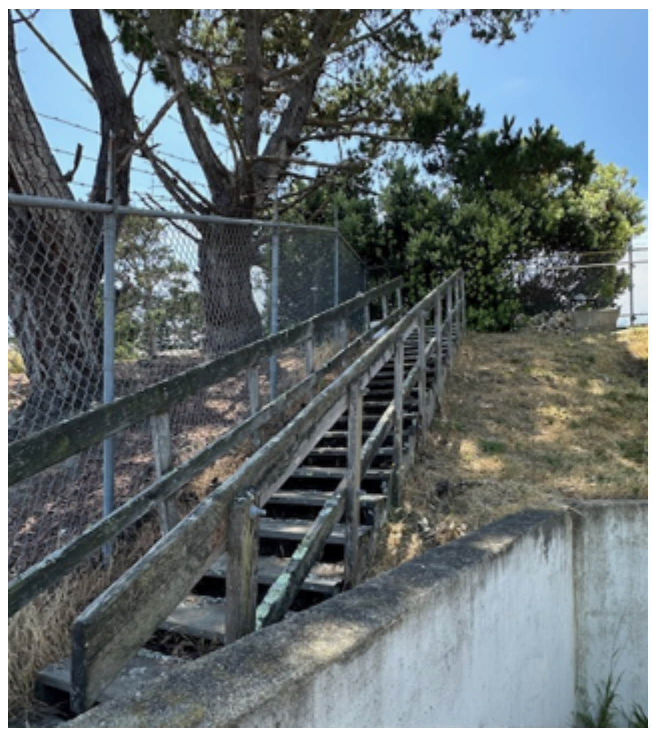


Photo 8: Inspection of Roundtree Lift Station (view 3).

Spill Public Report – Spill Event ID(s) Page

Here is the detail page of your Sanitary Sewer System Spill Report search for selected Regional Board, county, responsible agency, or sanitary sewer system. These results correspond to the following search criteria:

SEARCH CRITERIA: [REFINE SEARCH]

- WDID (**2SSO10665**)
- Spill Type **(Category 1; Category 2; Category 3)**)
- Agency (**Westborough Water District**)
- Agency (**Westborough Water District**)

The table below presents important details from Enrollee-submitted certified spill events, as submitted through individual spill reports, which meet the search criteria selected on the Sanitary Sewer System (SSS) Spill Report Form. If data is not shown for a particular field, it means the Enrollee did not provide the information and was not required to do so. To view the entire spill report, select the corresponding "Spill Event ID".

DRILLDOWN HISTORY:

REGION: **2**

Event ID	Region	Responsible Agency	Sewer System	WDID	Spill Category	Spill Start Date	Spill Vol (gal)	Spill Vol Recovered (gal)	Spill Vol Reached Surface Water (gal)	System Failure Location	Spill Appearance Point
729375	2	Westborough Water District	Westborough CS	2SSO10665	Category 3	2008-11-17 15:30	385	0	0		Manhole
738991	2	Westborough Water District	Westborough CS	2SSO10665	Category 3	2009-06-10 13:10	600	600	0	Pump station failure	Pump station
759562	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2007-09-03 09:11	1,225	125	1,100	SSO coming from two cleanouts. Crew responded, relieved blockage and clean sidewalk, gutter, and catch basin	Other (specify)
759564	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2007-05-21 16:20	385	65	320	Behind sidewalk on Eastbound side of Westborough Blvd. Manhole on side of landscaped hill.	Manhole
801052	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2013-11-21 11:15	5,396	2,000	3,396	Pump Station-Power	Manhole
836016	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2017-06-22 08:30	495	0	495	Gravity Mainline	Manhole
849911	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2018-08-05 22:20	1,453	0	1,453	Gravity Mainline	Gravity Mainline
869879	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2020-10-21 19:22	6,500	5,080	1,945	Gravity Mainline	Gravity Mainline
875694	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2021-08-06 11:14	361	0	361	Manhole	Manhole;Other sewer system structure
878432	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2021-12-28 08:37	1,395	0	1,395	Gravity Mainline	Manhole
881316	2	Westborough Water District	Westborough CS	2SSO10665	Category 1	2022-05-18 13:25	2,470	140	2,330	Gravity Mainline	Gravity Mainline
890146	2	Westborough Water District	Westborough CS	2SSO10665	Category 1 Spill	2023-09-01 16:30	632	432	200	Lower Lateral,Upper Lateral	Lower Lateral (Private),Upper Lateral (Private)
893360	2	Westborough Water District	Westborough CS	2SSO10665	Category 1 Spill	2024-02-05 20:44	40,170	4,375	35,795	Pump Station - Controls	Manhole,Pump Station
897250	2	Westborough Water District	Westborough CS	2SSO10665	Monthly Category 3 Spill	2024-10-16 11:00	50	50		Gravity Mainline	Lateral Clean Out (Private)

899678	2	Westborough Water District	Westborough CS	2SSO10665	Monthly Category 3 Spill	2025-01-14 08:55	266	266	Gravity Mainline,Manhole	Manhole
902345	2	Westborough Water District	Westborough CS	2SSO10665	Monthly Category 3 Spill	2025-06-29 08:50	82	82	Manhole	Lateral Clean Out (Private)

The current report was generated with data as of: Monday, September 29, 2025

APPENDIX 3 – SSMP Audit Implementation Plan and Schedule

The agency is currently working on addressing all identified deficiencies in this Audit and completing a customized Implementation Plan/Schedule for its SSMP update.

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-1						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-2						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-3						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-4						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-5						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-6						

REISSUED WDR (<u>ATT D:</u> IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-7						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-8						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-9						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-10						

REISSUED WDR (ATT D: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Att. D-11						

REISSUED WDR (SPECIFICATIONS: IMPLEMENTATION PLAN/SCHEDULE LOG – 2024 to 2027)						
Requirement	Finding	Agree? (Yes/No)	Proposed Schedule	Date Completed	Implementation Notes	LRO Initials
Spec 5.1 through Spec. 5-15						

Key Performance Indicators (KPIs)

This document provides a list of additional Key Performance Indicators (KPIs) to facilitate review of the Agency's SSMP for compliance and effectiveness required for SSMP Audits.

Table of Contents

1. ELEMENT I (Goal and Introduction)

Attach. D-1 (SSMP Goal and Introduction)

SSMP Implementation

○ KPI D-1(a)	○ Are the Agencys goals adequate in maintaining the sewer system, including O&M and spill reduction and response? ○ Does the Agency have established response time goals for customer service response?	Action: ○ Annual review

SSMP Effectiveness

○ KPI D-1(b)	○ Are the Agency's Preventative Maintenance work plans being Implemented?	Element Review Frequency/Tasks: ○ Annual review
○ KPI D-1(c)	○ Are Agency spill Reduction Goals being met?	○ Annual review
	○ What is the Agencys average response time for response?	○ Annual review
	○ Total number of spills prevented (plugged mains that were discovered while doing routine PM)	○ Annual review
○ KPI D-1(e)	○ Are Agency spill event responses effective?	Element Review Frequency/Tasks: ○ Annual review
○ KPI D-1(f)	○ Annual review/update of Agency goals and narrative descriptions	Element Review Frequency/Tasks: ○ Annual review
○ KPI D-1(g)	○ Annual review/update of system performance (wet weather spill/surcharge events).	Element Review Frequency/Tasks: ○ Annual review
○ KPI D-1(h)	○ Does the Agency update its sewer system asset inventory annually?	○ Annual review

SSMP Resilience

○ KPI D-1(h)	○ None	○ None

2. ELEMENT 2 (Organization)

Attach. D-2 (Organization)		
SSMP Implementation		
○ KPI D-2(a)	○ Are the Agency's organizational procedures adequate for ensuring full SSMP compliance?	Element Review Frequency/Tasks: ○ Annual review
SSMP Effectiveness		
○ KPI D-2(b)	○ Does the Agency SSMP adequately describe SSMP Responsibilities/Tasks for all staffing?	Element Review Frequency/Tasks: ○ Annual review
○ KPI D-2(c)	○ Is Agency Chain of Communication effective and updated?	○ Annual review
SSMP Resilience		
○ KPI D-2(d)	○ None	○ None

3. ELEMENT 3 (Legal Authority)

Attach. D-3 (Legal Authority)		
SSMP Implementation		
○ KPI D-3(a)	○ Does the Agency implement its existing codes and ordinances?	Element Review Frequency/Tasks: ○ Periodic review of sewer use ordinance implementation to ensure adequate required legal authority
SSMP Effectiveness		
○ KPI D-3(a)	○ Are the Agency codes and ordinances adequate for fulfilling the SSMP legal requirements?	Element Review Frequency/Tasks: ○ Annual review/update of review of completed work orders and customer complaints to ensure adequacy of authority ○ Annual review/update of any encounters by staff for circumstances where sewer use ordinance was inadequate
SSMP Resilience		
○ KPI D-3(d)	○ None	○ None

4. ELEMENT 4 (Operations and Maintenance Program)

Attach. D-4 (Operations and Maintenance)		
SSMP Implementation		
KPI D-4(a)	Are the Agency's organizational procedures adequate for ensuring full SSMP compliance? Are Agency preventative maintenance programs implemented and effective? Is Agency tracking metrics for miles of pipe cleaned, CCTV-inspected, and pump station inspections performed in system?	Element Review Frequency/Tasks: Annual review/update of Agency organizational staffing, contacts, and responsibilities Annual review of O/M program Annual review of program metrics
SSMP Effectiveness		
KPI D-4(b)	Are Agency maps up to date?	Element Review Frequency/Tasks: Annual review/update to ensure all system maps are up to date per change requests submitted by field staff
KPI D-4(c)	% of new assets added to Agencys sewer mapping system	Element Review Frequency/Tasks: Annual review/update of requirements to ensure compliance conformance. Annual review/update of current maps to ensure new construction project assets have been added.
KPI D-4(d)	Does Capital Improvement Plan (CIP) properly address Agency needs? Annual Agency Capital budget for rehabilitation or replacement?	Element Review Frequency/Tasks: Is each segment evaluated for capaAgency deficiencies based on projected growth Are system assets evaluated for remaining useful life Is existing CIP plan and schedule being implemented as intended?
KPI D-4(e)	Are Agency complete maintenance, operations, engineering work orders reviewed for accuracy and completeness? Number of annual PM work orders completed?	Element Review Frequency/Tasks: Annual review
KPI D-4(f)	Is Agency Rehabilitation and Replacement (R/R) plan being implemented?	Element Review Frequency/Tasks: Annual review/update of R/R plan to ensure adherence to plan and schedule
KPI D-4(g)	% of Agencys CCTV goal completed Number of annual CCTV work orders completed?	Element Review Frequency/Tasks:
KPI D-4(h)	Is Agency critical spare parts adequate and up-to-date.	Element Review Frequency/Tasks: Bi-annual review

	○ % if required critical spare parts in stock?	○ Bi-annual review
○ KPI D-4(i)	○ Has all required Agency staff training been completed?	Element Review Frequency/Tasks: ○ Bi-annual review
	○ % of required training completed for wastewater collection staff	○ Bi-annual review
SSMP Resilience		
○ KPI D-2j)	○ None	○ None

5. ELEMENT 5 (Design and Performance Provisions)

Attach. D-5 (Design and Performance Provisions)		
SSMP Implementation		
○ KPI D-5(a)	○ Does the Agency implement its current design and construction standards, specifications, and inspection procedures?	Element Review Frequency/Tasks: ○ Annual review
SSMP Effectiveness		
○ KPI D-5(b)	○ Are existing Agency design and construction standards, specifications, and inspection procedures adequate for the collection system?	Element Review Frequency/Tasks: ○ Annual review
	○ Annual review of the Agencys standards and procedures for acceptance and testing of new infrastructure?	○ Annual review
	○ % of new infrastructure accepted vs inspected	○ Annual review
SSMP Resilience		
○ KPI D-5(c)	○ None	○ None

6. ELEMENT 6 (Spill Emergency Response Plan)

Attach. D-6 (Spill Emergency Response Plan)

SSMP Implementation

KPI D-6(a)	Develop and implement a Spill Emergency Response Plan	Element Review Frequency/Tasks: ○ Quarterly review and training on SERP ○ Quarterly training/drills on SERP including practice drills with completing field data collection form

SSMP Effectiveness

KPI D-6(b)	Were Agency notification procedures outlined in the SERP adhered to for each spill event?	Element Review Frequency/Tasks: ○ Annual review
KPI D-6(c)	Procedures reviewed to provide prompt notification to appropriate Agency parties for a spill event?	Element Review Frequency/Tasks: ○ Annual review
KPI D-6(d)	○ Was Agency SERP training performed as prescribed in SSMP? ○ % of employees that completed annual training on SERP versus total field staff	Element Review Frequency/Tasks: Element Review Frequency/Tasks: ○ Annual review of completed checklists for all Category 1 spills >1,000 gallons reaching surface waters
KPI D-6(e)	Did the Agency complete a Category 1 spill assessment checklist for all large spills?	

SSMP Resilience

KPI D-6(f)	○ ○ Coordinate meetings to improve mapping and Spill response activities with Kern County ○ % of Bi-annual meetings with Kern County completed	○ None

7. ELEMENT 7 (Sewer Pipe Blockage Control Program)

Attach. D-7 (Sewer Pipe Blockage Control Program)

SSMP Implementation

		Element Review Frequency/Tasks:
○ KPI D-7(a)	○ Is Agency commercial FOG program being implemented and are goals being achieved?	○ Annual review of goals

SSMP Effectiveness

○ KPI D-7(b)	○ Is Agency residential FOG and root programs being administered and are goals being achieved?	○ Annual review
	○ Number of spills caused by hot spots or FOG	○ Annual review
	○ % of spills caused by FOG	○ Annual review
	○ % of spills caused by Roots	○ Annual review
	○ % of spills caused by debris/rags (non-Dispersables)	○ Annual review ○
	○ % of hot spots inspected annually	○ Annual review
	○ Number of hot spots removed from Hot Spot list annually?	○ Annual review

SSMP Resilience

○ KPI D-7(c)	○ None	○ None

8. ELEMENT 8 (System Eval./CapaAgency/Cap. Improvements)

Attach. D-7 (Sewer Pipe Blockage Control Program)

SSMP Implementation

- KPI D-8(a)
  - Has the Agency been adhered to its system evaluation/condition assessment efforts?

Element Review Frequency/Tasks:
- Annual review/update of system inspections/evaluations

SSMP Effectiveness

- % of sewer system condition assessment completed annually
- # of flowmeters installed to evaluate system capaAgency

KPI	Question	Element Review Frequency
KPI D-8(b)	Has the Agency experienced any capaAgency-related spills or surcharge events?	Annual review
KPI D-8(c)	Have any changes occurred within the Agency service area that might affect the hydraulic model?	Annual review
KPI D-8(d)	Has CIP capaAgency-related projects/schedule been adhered to?	Annual review
KPI D-8(e)	Has the prioritization/corrective actions for sewer repairs been adhered to?	Annual review
KPI D-8(f)	Has the capital improvement plan been adhered to?	Annual review

SSMP Resilience

- KPI D-8(g)
  - Improve capaAgency-related investigations and inspections

Element Review Frequency/Tasks:
- Periodic review of flow/level sensor data (wet weather months)
- Periodic review of goals and KPIs (wet weather months)

9. ELEMENT 9 (Monitoring, Measurement, Program Modifications)

Att. D-9 (Monitoring, Measurement. Program Modifications)		
SSMP Implementation		
○ KPI D-9(a)	○ Were Agency KPIs reviewed and evaluated for each element of the SSMP efforts?	Element Review Frequency/Tasks: ○ Annual review
SSMP Effectiveness		
○ KPI D-9(b)	○ Were annual Agency maintenance/repair activities including Performance Measures evaluated/updated?	Element Review Frequency/Tasks: ○ Annual review
○ KPI D-9(c)	○ Were any Agency SSMP program compliance point(s) corrected and/or updated based on results of performance measures? ○ Spills per 100 miles of pipe ○ Volume of spills per 100 miles of pipe ○ Number of Category 1 spills ○ Number of spills caused by lift station failure ○ Number of repeat spills from same location	Element Review Frequency/Tasks: ○ Annual review
SSMP Resilience		
○ KPI D-9(d)	○ None	○ None

10. ELEMENT 10 (Internal Audits)

Att. D-10 (SSMP Internal Audits)		
SSMP Implementation		
KPI D-10(a)	Were SSMP internal program audits completed?	Element Review Frequency/Tasks: ○ Review of Audit reports
SSMP Effectiveness		
KPI D-10(b)	Did the SSMP internal audit evaluate the SSMP for compliance?	Element Review Frequency/Tasks: ○ Review of completed SSMP internal audits
KPI D-10(c)	Did the SSMP internal audit evaluate the SSMP for effectiveness?	Element Review Frequency/Tasks: ○ Review of completed SSMP internal audits
KPI D-10(d)	Were all past SSMP internal audit findings and schedule met for incorporating new changes into SSMP?	Element Review Frequency/Tasks: ○ Review of past SSMP internal audit commitments and priorities, including any outstanding items not captured in SSMP/change log to be flagged for carry-over for next SSMP update
KPI D-10(e)	Were any upgrades made to enhance SSMP work programs?	Element Review Frequency/Tasks: ○ Review of SSMP/change log
SSMP Resilience		
KPI D-10(f)	None	None

11. ELEMENT 11 (Communication Program)

Att. D-11 (Communication Program)

SSMP Implementation

- KPI D-10(a)
  - Was the public afforded the opportunity to provide input as the program is being implemented?

Element Review Frequency/Tasks:
- Periodic review to ensure board has approved latest SSMP.
- Periodic review to verify latest SSMP/docs are posted on website.
- Periodic review of any public comments received via website or direct contact with Agency staff annual review/update of KPIs

SSMP Effectiveness

- KPI D-10(b)
  - Were all outside agency/communications documented?
  - Number of annual public outreach events
  - Number of Regional Partner meetings
  - % of customers receiving public outreach information

Element Review Frequency/Tasks:
- Element Review Frequency periodic review of outside agency/satellite meetings/emails/notices of communications.

SSMP Resilience

- KPI D-10(c)
  - External communications verifications

Element Review Frequency/Tasks:
- Annual review/update to ensure the general public has access to the Agency SSMP via website with a mechanism to provide input/comments

12. SPEC. 5.2 (Designation of LRO)

Spec. 5.1 (Designation of Legally Responsible Official)

SSMP Implementation

KPI 5.1(a)	Does the Agency LRO and supporting staff possess adequate knowledgeable, training, skills, and abilities for implementing all Reissued WDR requirements?	Element Review Frequency/Tasks: ○ Annual review/update of staff competency checks/tests

SSMP Effectiveness

KPI 5.1(b)	Are Agency LRO policies in place adequate, including authorization for making managerial decisions governing operation of the sanitary sewer system, including having the explicit or implicit duty of making major capital improvement recommendations to ensure long-term environmental compliance?	Element Review Frequency/Tasks: ○ Annual review/update of any issues arisen attributable to inadequate LRO oversight, training/competency ○ Annual review/update of KPI frequency and success rate/adjust as necessary
KPI 5.1(c)	Has the Agency complied with all the ongoing WDR deadlines?	Annual review/update of Agency compliance performance with spill notification, monitoring, reporting, recordkeeping
KPI 5.1(d)	Has the Agency complied with the change notification requirements for its LROs?	Review of any change(s) in LRO designation(s) and meeting compliance deadlines specified in Attachment E1
KPI 5.1(e)	Compliance with SWRCB pre-inspection questionnaire	Annual review/update of questionnaire, document changes to work programs/accomplishments
KPI 5.1(f)	Compliance with internal SSMP Audit findings and recommendations	Annual review/update of past SSMP Audit findings and recommendations for improving compliance, implementation, and spill reduction performance

13. SPEC. 5.2 (Develop/Implement SSMP)

Spec. 5.2 (Development and Implementation of SSMP)		
SSMP Implementation		
○ KPI 5.2(a)	○ Are the Agency's existing work programs effective in reducing spills to meet SSMP goals and objectives?	Element Review Frequency/Tasks: ○ Annual review/update of exiting work programs to ensure conformance with SSMP goals and objectives
SSMP Effectiveness		
○ KPI 5.2(b)	○ Does the Agency implement standard operator procedures (SOPs) to measure and support improving SSMP effectiveness?	Element Review Frequency/Tasks: ○ Annual review/update of Agency SOPs
○ KPI 5.2(c)	○ Does the Agency implement standard operator procedures (SOPs) to measure and support improving SSMP effectiveness?	Element Review Frequency/Tasks: ○ Annual review/update of all related SSMP procedures and work programs
○ KPI 5.2(d)	○ Does the Agency's existing data collection and work order system adequately allow analysis of potential impacts that could cause spills?	Element Review Frequency/Tasks: ○ Annual review/update data collection methods and work orders and documentation of accomplishments, including instances where spills were eliminated
○ KPI 5.2(e)	○ Do the Agency work programs include procedures for spill containment/recovery, sewer mapping, work order system/tracking, emergency responses, and operator training?	Element Review Frequency/Tasks: ○ Annual review/update of Agency work programs
○ KPI 5.2(f)	○ Does the Agency meet its proposed objectives with improving its SSMP ranking >80% by October 2024?	Element Review Frequency/Tasks: ○ Annual review/update and assessment/ranking of all SSMP requirements
SSMP Resilience		
○ KPI 5.2(g)	○ Collection system certification (CWEA)	Element Review Frequency/Tasks: ○ Annual survey of line staff resources

14. SPEC. 5.6 (System Resilience)

Spec. 5.6 (Sewer System Resilience)		
SSMP Implementation		
○ KPI 5.6(a)	○ Are the Agency's existing efforts in identifying possible spill vulnerabilities effective?	Element Review Frequency/Tasks: ○ Annual review/update/update of historic spill causes and vulnerabilities
SSMP Effectiveness		
○ KPI 5.6(b)	○ Does the Agency proactively prioritize its operation and maintenance, condition assessments, and repair, and rehabilitation efforts to help further reduce vulnerabilities for spills??	Element Review Frequency/Tasks: ○ Annual review/update of Agency CCTV records and data
○ KPI 5.6(c)	○ Does the Agency assess/review its ongoing historic spills, causes, and vulnerabilities?	Element Review Frequency/Tasks: ○ Annual review/update/update of historic spill causes and vulnerabilities; adjust resilience matrix as necessary
○ KPI 5.6(d)	○ Does the Agency implement a program to address existing "Hot Spots" to help further reduce vulnerabilities for spills?	Element Review Frequency/Tasks: ○ Annual review/update/update of "hot spot" implementation plan/schedule conformance
○ KPI 5.6(e)	○ Does the Agency have a "Hot Spot" reduction program to help further reduce vulnerabilities for spills??	Element Review Frequency/Tasks: ○ Annual review/update of specific "hot spot" resources (time/labor/materials) spent on cleaning all locations and list of locations repaired, resolved, and eliminated
SSMP Resilience		
○ KPI 5.6(f)	○ Collection system electronic monitoring	Element Review Frequency/Tasks: ○ Evaluation for installation of flow/level sensors in system areas necessary for further reducing risks for future spills and improve monitoring
	○ Collection system resilience	○ Development of Agency "resilience indicators" for measuring how well the collection system can withstand and recovery quickly from real-world stresses, setbacks and /or difficulties including major infrastructure failures

15. SPEC. 5.7 (Allocate Necessary Resources)

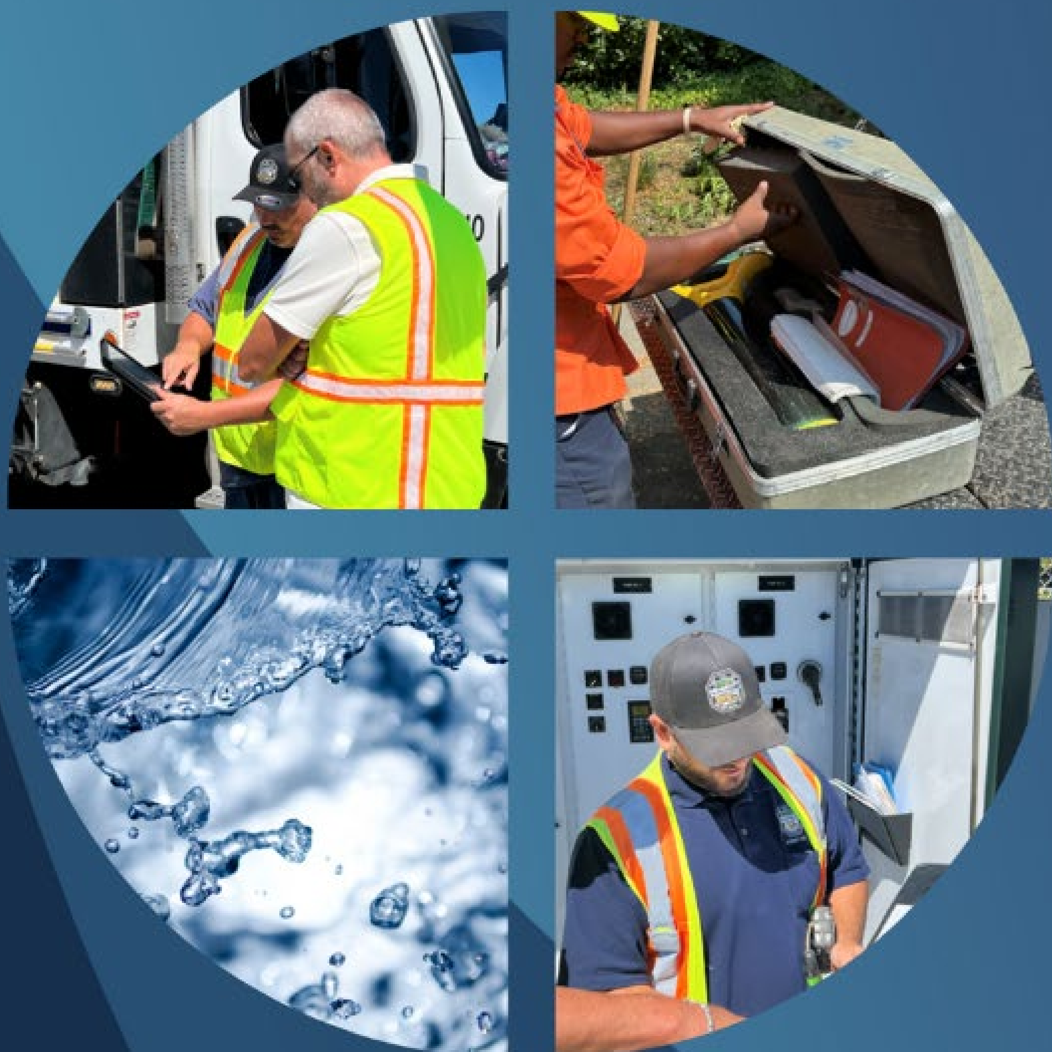
Spec. 5.7 (Allocate Necessary Resources)		
SSMP Implementation		
○ KPI 5.7(a)	○ Are the Agency's existing resources adequate?	Element Review Frequency/Tasks: ○ Annual review/update of resource allocations and budgets specific to sewer collection system operations, maintenance, and capital improvements
SSMP Effectiveness		
○ KPI 5.7(b)	○ Does the Agency maintain adequate means to manage revenues and expenditures for supporting the sewer collection system?	Element Review Frequency/Tasks: ○ Annual review/update of Agency budget allocations/funds spent on sewer system ○ Long-range review (5-10 years) of Agency financial planning for ensuring adequate budgets/allocations for sewer system operations/maintenance and capital projects
○ KPI 5.7(c)	○ Does the Agency maintain adequate sewer fees for supporting its the sewer system requirements?	Element Review Frequency/Tasks: ○ Annual review/update of Agency sewer fees
SSMP Resilience		
○ KPI 5.7(d)	○ None	○ None

16. SPEC. 5.13 (Comply with Attachment E1 Requirements)

Spec. 5.13 (Compliance with Attachment E1 Requirements)		
SSMP Implementation		
○ KPI 5.13(a)	○ Are the Agency's data collection efforts (field forms, work order system) adequate for supporting all required information required by Attachment E1?	Element Review Frequency/Tasks: ○ Annual review/update of Agency data collection and reporting efforts against Attachment E1 requirements
SSMP Effectiveness		
○ KPI 5.13(b)	○ Do Agency field data collection efforts comply with Attachment E1?	Element Review Frequency/Tasks: ○ Element Review Frequency annual review/update of all Agency field data collection forms against requirements
○ KPI 5.13(c)	○ Are required spill notification timeframes for Category 1 spills being met?	Element Review Frequency/Tasks: ○ Element Review Frequency annual review/update of all Category 1 spills against requirements for notifying Cal-OES within 2 hours
○ KPI 5.13(d)	○ Are required spill notification timeframes for Category 2 spills being met?	Element Review Frequency/Tasks: ○ Element Review Frequency annual review/update of all Category 2 spills against requirements for notifying Cal-OES
○ KPI 5.13(e)	○ Are required spill reporting timeframes for Category 3 spills being met?	Element Review Frequency/Tasks: ○ Element Review Frequency annual review/update of all Category 1 spills vs. requirements
○ KPI 5.13(f)	○ Are required spill reporting timeframes for Category 4 spills being met?	Element Review Frequency/Tasks: ○ Element Review Frequency annual review/update of all Category 1 spills vs. requirements
○ KPI 5.13(g)	○ Are the Agency field staff competent with operations, maintenance, repair, and spill response procedures?	Element Review Frequency/Tasks: ○ Assessments (every 3 years) for all Agency field staff
SSMP Resilience		
○ KPI 5.13(h)	○ Quarterly training on Agency field data collection form and required procedures	Element Review Frequency/Tasks: ○ Quarterly training to ensure consistency with staff data collection and improving procedures as necessary

APPENDIX 5 – References (Key Regulatory References for SSMP Development and Updating)

Guide for Developing and Updating of Sewer System Management Plans



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APPENDIX 5 (Page2)

Appendix 1 (Key Regulatory Changes for Sewer System Management Plan Development/Updates)

2006 WDR (rescinded)	2022 WDR (current)	2022 Changes	Summary of Key 2022 WDR Changes
1. Goal Provision D.13(i)	1. Goal and Introduction Att. D-6, Spec. 5.2	Many	• Implementation of SSMP as "living document." • Enforcement of development, update, and implementation. • Narratives for regulatory context, assets, updated sewer map(s).
2. Organization Provision D.13(ii)	2. Organization Attachment D-6, Spec. 5.1	Few	• Name of Legally Responsible Official. • Enhanced details on LRO training and experience requirements.
3. Legal Authority Provision D.13 (iii)	3. Legal Authority Attachment D-6	Few	• Collaboration with storm drain agencies; easement accessibility agreements.
4. O/M Program Provision D.13 (iv)	4. O/M Program Attachment D-6	Many	• Procedures for maintaining/providing Water Board access to sewer map(s) • Enhanced training/WDR, drills/skilled vol. est., CIWQS reporting; scheduling system in place.
5. Design and Performance Provisions Provision D.13 (v)	5. Design and Performance Provisions Attachment D-6	Few	• Few changes.
6. Overflow Emergency Response Plan Provision D.13 (vi)	6. Spill Emergency Response Plan Attachment D-6	Many	• 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 plan is up-do-date.
7. Fats, Oils, and Grease Control Program Provision D.13 (vii)	7. Sewer Pipe Blockage Control Program Attachment D-6	Few	• Plan/schedule for pipe-blocking substances. • Commercial controls/authority to inspect, "hot spot" program, source controls.
8. System Evaluation and Capacity Assurance Plan Provision D.13 (viii)	8. System Evaluation, Capacity Assurance, and Capital Improvements Attachment D-6	Many	• 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.

2006 WDR (rescinded)	2022 WDR (current)	2022 Changes	Summary of Key 2022 WDR Changes
			• Enhanced coordination (operations/maintenance/engineering, other utilities).
9. Monitoring, Measurement, and Program Modifications Provision D.13 (ix)	9. Monitoring, Measurement, and Program Modifications Attachment D-6	Few	• Adaptive management/implementation effectiveness (Key Performance Indicators) • Update plan procedures/activities based on monitoring/performance evaluations.
10. SSMP Audits	10. Internal Audits Attachment D-6	Few	• Completed every 3 years (vs. every 2 years), input from operators, and cert/upload/LRO.
11. Communication Program Provision D.13 (xi)	11. Communication Program Attachment D-6	Few	• Enhanced communications procedures (public/owners/operators connected to sewers).

2006 WDR (rescinded)	2022 WDR (current)	2022 Changes	Summary of Key 2022 WDR Changes
Legally Responsible Official	Designation of LRO Spec. 5.1 (pg. 18)	Major	• Legally Responsible Official 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. • Legally Responsible Official 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 Provision D.11 (pg. 9)	SSMP Development and Implementation Spec. 5.2 (pgs. 18-19)	Major	• 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 System Management Plan + Updates Provision D.14 (pg. 15)	Certification of SSMP and Updates Spec. 5.3 (pg. 19)	Major	• Legally Responsible Official must certify/upload SSMPs to CIWQS.
SSMP Internal Audits Provision D.13(x) (pg. 14)	SSMP Development and Update Spec. 5.4 (pgs. 19-20)	Minor	• Audits of SSMPs every 3 years (vs. every 2 years under 2006 WDR). • 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 WDR). 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

2006 WDR (rescinded)	2022 WDR (current)	2022 Changes	Summary of Key 2022 WDR Changes
			deficiencies.
SSMP Updates Provision D.14 (pg. 15)	Six-Year SSMP Update Spec. 5.5 (pgs. 21)	Minor	• Agencies must update their SSMPs and include a summary of revisions based on Audit findings every 6 years (vs. every 5 years under 2006 WDR).
N/A	System Resilience Spec 5.6 (pg. 22)	N/A	• Agencies must include and implement system-specific procedures to proactively prioritize O/M, condition assessments, and repair/rehabilitation.
Notif, Monit, Report., Records 2013-0058-EXEC	Notif, Monit, Report., Records Attachment E1	Major	• Numerous changes throughout; adds one new spill category (Category 4); new reporting requirements for systems with enrollee-owned laterals.
Collection System Questionnaire	Annual Report	Minor	• Streamlined (fewer) reporting fields; requires uploading of spill performance charts; includes options for adding comments and/or attaching doc(s) to elaborate on answers.
N/A	Sanitary Sewer System Service Area Boundary Map	Major	• New requirements (Specifications 5.14) for uploading an electronic boundary map (required between July1 to Dec 31, 2025, for all continuing enrollees).
N/A	Pre-Insp. Questionnaire	Major	• Requires agencies to provide pre-inspection information to State and Regional Water Board staff through the completion of a Questionnaire (see Provisions 6.4.2).