

**Sewer System Management  
Plan (SSMP)  
Development Guide**

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## Table of Contents

Section	Page
GENERAL INFORMATION.....	3
What is a Sewer System Management Plan? .....	3
Why are SSMP's Being Required? .....	3
What Is Required of My Agency? .....	4
Terms That Appear in This Guide .....	4
ELEMENTS OF AN SSMP .....	6
Organization .....	7
Examples of SSMP Roles .....	7
Overflow Emergency Response Plan .....	8
Fats, Oils and Grease (FOG) Control Program .....	10
CITY OF HOLLISTER SSMP PLAN 2007.....	12
Goal .....	12
Organization .....	12
Reporting Procedures .....	12
LEGAL AUTHORITY .....	13
OPERATION MAINTENANCE PROGRAM .....	14
DESIGN AND PERFORMANCE PROVISIONS .....	17
OVERFLOW EMERGENCY RESPONSE PLAN .....	18
FOG (FAT, OIL AND GREASE) CONTROL PROGRAM ...	20
SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN.....	21
MONITORING, MEASUREMENT AND PROGRAM MODIFICATIONS.....	22
SSMP AUDITS.....	22
COMMUNICATION PROGRAM .....	23

# **Sewer System Management Plan (SSMP) Development Guide**

## **GENERAL INFORMATION**

### **What is a Sewer System Management Plan?**

A Sewer System Management Plan, also called SSMP, is a document that describes the activities your agency uses to manage your wastewater collection system effectively.

Effective management of a wastewater collection system includes:

1. Maintaining or improving the condition of the collection system infrastructure in order to provide reliable service into the future.
2. Cost-effectively minimizing infiltration/inflow (I/I) and providing adequate sewer capacity to accommodate design storm flows.
3. Minimizing the number and impact of sanitary sewer overflows (SSOs) that occur;

In order to achieve the above goals it is expected that each wastewater collection system agency develop and implement an SSMP.

### **Why are SSMP's Being Required Now?**

Collection Systems are the last major component of the wastewater management system yet to be regulated. Treatment plants, including pretreatment programs, have been regulated for some time. In addition, other networks have been regulated as well, such as potable water, natural gas, electricity, and liquid fuels, among others. Yet a successful regulatory program for sanitary sewer systems has not yet been developed in the City of Hollister. While the federal government has developed unpublished draft regulations (sometimes referred to as the "CMOM" program, which stands for Capacity, Management, Operation, and Maintenance), this program has not been officially implemented for

a variety of reasons, and Regional Water Boards in California have decided to move forward and implement their own SSO control programs now due to the growing emphasis on reducing overflows.

### **What Is Required:**

**In summary, the required elements of an SSMP include:**

1. Collection system management goals
2. Organization of personnel, including the chain of command and communications
3. Overflow emergency response plan
4. Fats, oils, and grease (FOG) control program
5. Legal authority for permitting flows into the system, inflow/infiltration control as well as enforcement of proper design, installation, and testing standards, and inspection requirements for new and rehabilitated sewers
6. Measures and activities to maintain the wastewater collection system
7. Design and construction standards
8. Capacity management
9. Monitoring plan for SSMP program effectiveness
10. Periodic SSMP audits, periodic SSMP updates, and implementation of program

### **Terms That Appear in This Guide**

Infiltration/Inflow (I/I)-Infiltration is generally considered to be extraneous water that enters the sewer system over longer periods of time, such as groundwater seepage through cracks in the sewer. Inflow is generally considered to be extraneous water that enters the system as a direct result of a rain event, such as through improper connections to the sanitary sewer, through flooded manhole covers, or through defects in

the sewer. While it is impossible to control all I/I, it is certainly desirable to reduce I/I when cost-effective.

Regional Water Board- Regional Water Quality Control Board (also known as RWQCB). The mission of this state regulatory agency is to: preserve, enhance and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations. The Regional Water Board has worked in collaboration with BACWA (Bay Area Clean Water Agencies) to develop the SSMP development guide.

Sanitary Sewer Overflow (SSO)- For the City of Hollister SSO program, an SSO is defined as a spill, release, or unauthorized discharge of wastewater from a sanitary sewer system at any point upstream of a wastewater treatment facility that is caused by a problem in or with sewer system authorities' sewer lines including lateral owned by the authorities. For reporting purposes all overflows are to be reported electronically to the Regional Water Board.

Sewer System Agency- The legal entity that owns and is ultimately responsible for the wastewater collection system. Also called wastewater collection system agency.

Stoppage- A build up of debris in the sewer which stops the flow of wastewater and allows the water to back up behind the stoppage, sometimes causing an overflow. Also called a blockage.

Blockage- A build up of debris in the sewer, in which stops the flow of wastewater and allows the water to back up behind the stoppage, sometimes causing an overflow. Also called a stoppage.

Wastewater Collection System- All pipelines, pump stations, and other facilities upstream of the headworks of the wastewater treatment plant that transport wastewater from its source to the wastewater treatment plant.

Wastewater Collection System Agency- The legal entity that owns and is ultimately responsible for the wastewater collection system. Also called sewer system agency.

## **ELEMENTS OF AN SSMP**

### **Organization:**

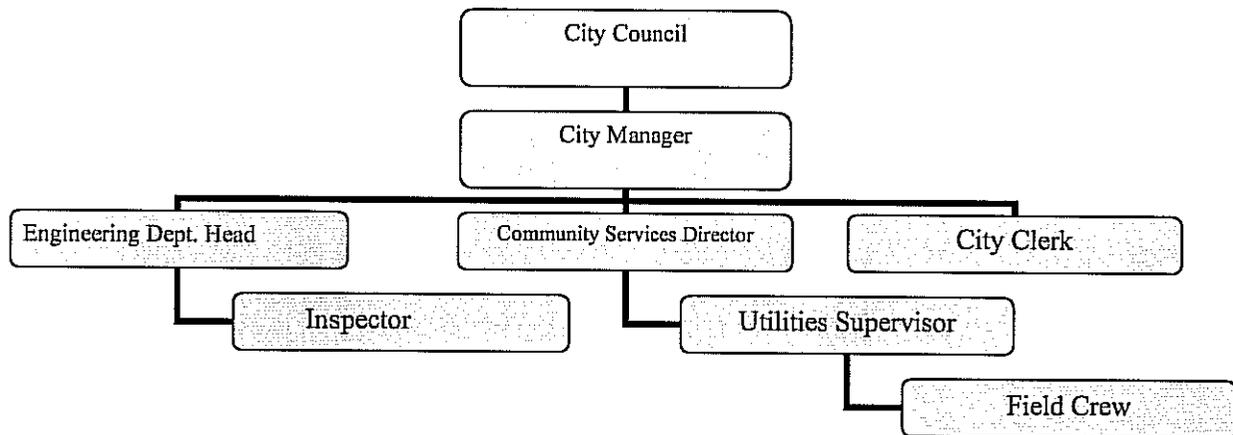
Requirement: Each wastewater collection agency shall, at a minimum, provide information regarding organization:

- Identify agency staff responsible for implementing, managing, and updating the SSMP
- Identify chain of communication for responding to SSOs
- Identify chain of communication for reporting SSOs

This section is applicable to all wastewater collection systems.

### Helpful Information

The organization identifies those agency staff responsible for implementing, managing, and updating the SSMP. The communication plan identifies agency staff responsible for managing the SSO response, investigating the cause, and reporting the SSO to the appropriate parties. It also provides a consolidated list of contact information for key agency personnel. This portion of the SSMP should also describe lines of communication by which an SSO is reported to the wastewater collection system agency (for example by members of the public); how management staff is notified; and how maintenance staff, contractors, and equipment are mobilized.



Examples of SSMP roles for wastewater collection system agency staff are:

City Manager, Community Services Director-Establishes policy, plans strategy, leads staff, allocates resources, delegates responsibility, authorizes outside contractors to perform services, and may serve as public information officer.

Engineering Dept. Head-Prepares wastewater collection system planning documents; manages capital improvement delivery system; documents new and rehabilitated assets; and coordinates development and implementation of SSMP.

Inspector-Ensures that new and rehabilitated assets meet agency standards, works with field crews to handle emergencies when contractors are involved; and provides verbal reports to District Engineer.

Utilities Supervisor-Manages field operation and maintenance activities, provides relevant information to agency management, prepares and implements contingency plans, leads emergency response, investigates and reports SSOs, and trains field crew.

Field Crew-Staff preventive maintenance activities, mobilize and respond to notification of stoppages and SSOs (mobilize sewer cleaning equipment and portable generators).

City Clerk-Provides information updates to Board or City Council. Arranges for emergency meetings if necessary.

It is suggested that job titles be used instead of individual names, in order to accommodate staff changes.

## **Overflow Emergency Response Plan**

Requirement: Each wastewater collection system agency shall develop an overflow emergency response plan with the following elements:

- Notification- Override SSO notification procedures.
- Response- Develop and implement a plan to responds to SSOs.
- Reporting- Develop procedures to report and notify SSOs per SSO Monitoring and Reporting Program.

Impact Mitigation- Develop steps to contain wastewater, to prevent overflows from reaching surface waters, and to minimize or correct any adverse impact from SSOs.

This section is applicable to all wastewater collection systems.

### Key point

The response plan should be developed as a stand-alone document and summarized in the SSMP, and updated as necessary to reflect any changes in staffing or notification requirements, including contact numbers.

### Helpful Information

An overflow emergency response plan provides a standardized course of action for wastewater collection system personnel to follow in the event of an SSO, and ensures that the sewer system agency is adequately prepared to respond to SSO events. The plan does not need to be organized specifically into sections corresponding to the required elements, but the plan should address each of the required elements.

Further information on each of the required elements of an emergency response plan is shown below:

Notification- This element includes information on how the agency could be notified of an SSO through a complaint or a report from outside the agency or within the agency, and also the internal agency chain of communication leading up to the response to the overflow. Internal communication responsibilities during and after the overflow should also be included.

Response- The plan for responding to SSOs should describe the staff and expected response time for SSOs, and any details associated with mobilizing for the response.

Reporting- This Element includes a procedure for evaluating whether an overflow event triggers 24-hour reporting (such as in the case of an SSO that is 1,000 gallon or more; if the SSO may imminently and substantially endanger human health, or if the SSO causes a fish kill). This element would also include the individuals expected to do the reporting and identify the external agencies receiving the reports. The transmission media options should also be identified. Impact

Mitigation- The plan should describe potential system failures in order to be prepared for potential overflow situations, and strategies and emergency operation for responding to these potential system failures.

Many sewer system agencies may already have an overflow emergency response plan in place. If the existing overflow emergency response plan contains all the elements required by the SSMP, the wastewater water collection agencies can just refer to the documentation that already exists. If a plan does not currently exist for your sewer system agency, you may wish to consult a publication by the American Public works Association (APWA), Preparing Sewer Overflow Response Plans: A Guidebook for Local governments, published in 1998. This 55-page document is a step-by-step guide to developing a plan, including agency coordination strategies, strategies for minimizing private property damage, public notification, and follow-up cleaning and reporting. Training of agency personnel on the emergency response plan in

important. Conducting periodic exercises to ensure that both training and emergency equipment are relevant and functional is important.

## **Fats, Oils and Grease (FOG) Control Program**

Requirement: Each wastewater collection system agency shall evaluate its service area to determine whether a FOG control program is needed. If so, FOG control program shall be developed as part of the SSMP. If an agency determines that a FOG program is not needed, the agency must provide justification for why it is not needed.

This section is applicable to all wastewater collection systems.

### Key Point

A FOG control program should identify sections of the sewer system subject to grease blockages and establish a cleaning maintenance schedule for each section. Identification of these blockages “hot spots” and their causes is usually based on blockage history, line investigation, and inspection of FOG dischargers (such as restaurants). Hot spots can then be addressed through more frequent cleaning, targeted outreach, and additional regulation on FOG discharges.

### Helpful Information

Grease can be a significant source of sewer blockages in some communities potentially leading to SSOs. If grease is a source of SSOs in your community, recommended elements of a FOG control program include the following:

- Identification & Sewer Cleaning – Identify areas or line segments of the wastewater collection system subject to grease stoppages and establish a prioritized preventive cleaning schedule for each area or line segment.

- Source Control – Develop and implement source control measures for each area of the wastewater collection system identified, for all sources of grease that may be discharged.
- Facility Inspection- Inspect grease-producing facilities, with priority given to previously identified problem areas.
- Legal Authority- Ensure legal authority to prohibit discharges to collection system, as appropriate.

Some communities already have a FOG control program in place, and in that case, the SSMP can refer to the documentation that already exists. If a sewer system agency is developing a FOG control program for the first time, several resources exist, and neighboring agencies with existing programs can provide information for consideration in developing a program that meets the specific needs of your sewer system agency.

Another resource is the California FOG Work Group, a special group organized within Tri-TAC (Tri-TAC is a technical advisory committee representing municipal wastewater management agencies. Members include the California Association of Sanitation Agencies, the League of California Cities, and the California Water and Environment Association). CalFOG works to compile information about FOG for sewer system authorities. CalFOG also works on specific FOG issues of interest to the wastewater industry. Information compiled by CalFOG includes best management practices for restaurants and residents, public information and outreach materials, technical guides, laws and regulations, and technology resources. This information can be found at [www.calfog.org](http://www.calfog.org).

If discharger-specific blockages or permit violations persist, additional source control or installation of grease removal devices may be warranted. Outreach to residences can also be helpful in reducing the total FOG load to the collection system.

**CITY OF HOLLISTER  
SEWER SYSTEM MANAGEMENT PLAN 2007**

**I. GOAL:**

The goal of the City of Hollister SSMP (Sewer System Management Plan) is to prevent overflows and to implement a response plan for scheduling preventive measures for the elimination of future overflows.

**II. ORGANIZATION:**

Community Services Director: Clayton Lee (831)636-4370  
City Engineer Manager: Steve Witry (831)636-4340  
Utilities Supervisor: Henry Gonzales (831)636-4377  
Senior Maintenance Worker: Pete Galvan (831)636-4377

**Reporting Procedures:** All discharges which are greater than 1,000 gallons in volume or any size discharge that is likely to come into contact with surface or groundwater or any discharge where contact with the public is likely, the City shall notify the RWQCB within 24 hours of the discharge.

- Telephone notification shall occur within 24 hours of the discharge occurrence to the RWQCB at (805)543-0397.
- A Field Overflow Report shall be written immediately after cleanup procedures have been completed and shall be sent to the Utilities Supervisor.
- A final written report shall be written and filed with RWQCB within 5 working days after the occurrence. All other agencies shall be notified as necessary and as required.

### III. LEGAL AUTHORITY:

- A. Regarding I/I (Inflow and Infiltration), the City of Hollister Municipal Code, Title 13, Chapter 13.04.220 state “No person shall make any connection of roof downspouts, exterior foundation drains, carry-away drains or other sources of surface runoff or groundwater to a building sewer or building drain which, in turn, is connected directly or indirectly to the public sanitary sewer”. Individual site inspections conducted by City personnel throughout the construction process insure that this Chapter is enforced.
- B. The City of Hollister Municipal Code, Title 13, Chapter 13.04.200, Sewer Connection Design and Construction, Section A, Building Sewer, states in essence, the size, slope, alignment, construction materials, methods of excavation, placing of pipe, joining, testing and backfilling of the trench, shall conform to current plumbing codes, as well as City of Hollister standards and specifications.
- C. The City of Hollister Municipal Code, Title 13, Chapter 13.04.200 Section B, Sewer Connections, states that building sewer connections to the public sewer shall conform to the City building and plumbing requirements and City standards and specifications at the time of connection. Any deviations from these standards and specifications shall be approved by the Community Services Director or City Engineers.
- D. The City of Hollister Municipal Code, Title 13, Chapter 13.04.230 states that all permittees shall notify Public Works whenever a building sewer is ready for inspection prior to connection to the public sewer. No connection shall be made without prior inspection or without approval of a City Inspector. The inspection shall cover all aspects of the requirements under Chapter 13.04.200, Sections A and B.
- E. The City of Hollister Municipal Code, Title 13, Chapter 13.04.100 states that no person may discharge any water or

waste containing fat, wax, grease, or oils in excess of 100 ml/L into the public sewer. This section also addresses other prohibited substances, chemicals or materials that may block damage or injure the sewer, treatment facilities, or related equipment; have an adverse affect on the collection system or receiving stream; or which may cause harm to the public.

#### **IV. OPERATION AND MAINTENANCE PROGRAM:**

- A. The City operates and maintains the sanitation system using scheduled cleaning intervals. Inspections are performed seven days per week to insure the lift stations are functioning properly and that all electrical controls are in good working order. Every two weeks, or more often as needed, maintenance staff removes grease and debris from the lift stations. Pumps are repaired as needed and are replaced when warranted. Maintenance staff is scheduled for specialized maintenance and operation classes when available either to refresh current skills or to learn new O & M techniques. Each maintenance staff person has an assigned vehicle with tools and supplies carried on the vehicle in order to expedite response-time equipment adjustments or repairs. Maintenance staff is assigned to rotating standby duty after normal work hours to provide year-round responses to emergency situations and to conduct routine inspections.
- B. The City has a map indicating sizes and locations of gravity mains and force mains, lift stations, manholes, and other appurtenances. The map was updated in November 2002 and we continue to include structures as they constructed.
- C. The City of Hollister Community Services Department, Utility Section maintains records and reports of all overflows affecting the public sewer and lateral problems that our clients request our maintenance staff respond to for assistance. We track individual addresses in order to identify problematic areas within definitive

boundaries or vicinities that may benefit from increased surveillance and maintenance, such as more frequent line cleaning and inspections. The current program was updated in October 2002 and has resulted in a significant reduction in overflows of 1,000 gallons or more, as well as a reduction in the overall number of smaller overflows.

- D. Individual lift station cleaning and maintenance occurs approximately every two to three weeks, depending upon the amount of debris noted during our daily inspections. Line cleanings occur on a rotational schedule, with the most seriously affected lines cleaned approximately two to three times per year with the remaining lines cleaned every 6-12 months. We have targeted those particular areas and neighborhoods that are most prone to blockages and overflows through our reporting and tracking system in order to minimize overflows.
- E. The City has instituted a program to identify those areas most prone to overflows and blockages. We have videoed approximately 8,000 feet of lines to date and shall continue this program as one of the most useful tools at our disposal for identifying problematic areas. We have collected our video tapes into a reference library with documentation and narrative indicating whether problem areas are in need of immediate corrective action versus minor problems that we can continue to monitor for future repairs. We schedule video taping approximately every other month with a local vendor and commences repairs within 1-2 weeks after finding areas in need of immediate repair or replacement. We began videoing taping the older sections of the City as they appear to be the most troublesome and in need of scheduled maintenance and cleaning. Our Sanitation Division maintenance staff provides the labor while utilizing a wide variety of Utility Section equipment for the repair and replacement projects. We use outside contractors and vendors whenever we encounter those types of repairs that are beyond the scope of our abilities and when it is more efficient to use outside resources.

- F. Maintenance staff receives specialized training by the VacCon manufacturer on proper maintenance and operation of the vehicle and the various functions of the equipment and devices. We also have the maintenance staff work with our Fleet Division personnel when some vehicle or equipment repairs occur in order to have our personnel attain a better understanding of how the equipment operates, the inherent limits of the devices and how to recognize hazardous situations or pending breakdowns. We have various vendors that sell us replacement equipment and devices for the VacCon on an ongoing basis. These vendors spend time onsite with the maintenance staff demonstrating how the devices operate. We have several experienced independent contractors that have assisted us in the past with repair projects, including Don Chapin Construction, Granite Construction, and Mark Nicholson Construction.
- G. We have a dedicated storage facility where we maintain an inventory of replacement parts and equipment. We have a system of “use and reorder”, when one part is used in the field we take inventory of remaining stock and order additional parts as needed. The vast majority of our in-ground pipes, valves, and related operational equipment are standard stock or sizes, which allows us to use a variety of vendors for reordering and restocking. Parts and equipment are kept in sufficient quantities to allow for multiple emergency and routine usages.
- H. The City is currently finalizing a “Sewer Protection and Grease Abatement Program Work Plan” to satisfy requirements for the Sanitation and Wastewater Treatment Facilities programs. The final plan shall be brought to the City of Hollister council for approval and acceptance. We are also in contact with outside independent firms who have expertise in promoting public awareness in preventing individuals and businesses from pouring grease and oils down the sanitary sewer and placing those substances instead in containers for transportation to authorized disposal sites. The plan shall include alternative disposal methods

for residential, commercial and industrial grease and oils, as well as an implementation plan and schedule.

- I. The City responds in matters of mutual aid to neighboring agencies in the event of overflows on private, commercial and governmental properties. We are in the process of purchasing containment booms, pumps, hoses and related equipment to prevent or lessen the amount of untreated wastewater from reaching storm drains, ditches, streams and bodies of water. We meet on a monthly basis with other local water/wastewater agencies to discuss methods of response, areas of concerns, availability of equipment and other beneficial topics between our agencies.

## **V. DESIGN AND PERFORMANCE PROVISIONS:**

- A. The City uses “Standard Specifications for Public works Construction” 2003 edition; “Engineering Department Design Standards, Standard Specifications, Standard Plans” dated 1992 and the UPC (Uniform Plumbing Codes) for the majority of our design criteria. The City Ordinance lists standard specifications for construction and installation of sewers and collection systems under Chapter 13.04.200. We are also in the process of assembling additional standards and specifications for construction of lift stations, lift station pumps, controls, and related appurtenances for incorporation into the City’s Ordinance and Design Specification standards.
- B. The City has Public Works Inspectors in the Engineering Department assigned to individual projects that are experienced with all phases of construction, including design and installation of sanitation systems, lift stations, valves, piping, and related appurtenances.

We are training our Utility Section personnel to be familiar with all phases and types of sanitation system construction and installation projects in order to assist the Engineering Department with their inspections. We will also be providing comments and conditions to our Development Services Department to be adopted into each individual project submitted to the City for approval.

## **VI. OVERFLOW EMERGENCY RESPONSE PLAN:**

- A. Our Sanitation Maintenance staff that is on standby duty (after normal duty hours, weekends, and holidays) is required to carry cellular phones throughout the standby period. They are required to make use of a City vehicle equipped with a mobile radio, as well as having handheld radios while on standby. In addition, the Utility Supervisor and Water System Maintenance staffs have assigned vehicles, cellular phones, mobile and handheld radios they are required to have with them while on standby and they can respond in emergency situations to assist Sanitation standby personnel.
- B. Our Maintenance staff has forms with local and state agencies contact information printed on the sheets in order to notify the appropriate agencies in an overflow event. Maintenance staff responding to overflows contacts either the Utility Supervisor or Community Services Director whenever an overflow occurs. The decision is then made as to what agencies should be notified according to current RWQCB. Reports are filed with the necessary agencies according to the components of the overflow, whether the water reached a body of water or the overflow is equal to or exceeds 1, 000 gallons. Our local San Benito Health and Human Services contact is Robert Shingai, RPHS, and our local EOS representative is Brian Temper.

- C. Sanitation maintenance staff as well as water system maintenance staff is trained in overflows containment. The two crews have assisted each other in past emergency situations following training and in the field hands on experiences for both water and wastewater. All crew members have been cross trained in the use of our VacCon vehicle, as well as pumps, heavy equipment, portable generators and other related emergency response equipment. We have also worked with local contractors in the past where those contractors have responded and collaborated with Utility Section personnel in various emergency situations.
- D. The first concern with every situation is the safety of our maintenance staff and the public at large. The crew members address the potential dangers upon arrival at the site and take appropriate actions to establish safety perimeters around and near our vehicles and equipment, the overflow site and any other areas that could cause an unsafe condition to develop. Additional personnel, either other Utility Division or other Public Works personnel, can be contacted to assist with traffic or bystander control in order to maintain these safety perimeters.
- E. Our Sanitation Crew Members place sandbags around storm drains in the event of overflows. We then vacuum the accumulated water from the overflow into our VacCon vehicle to prevent water from entering the storm drains. We also have portable pumps and discharge hoses available to remove large amounts of standing water back into a downstream manhole should the event warrant such action.
- F. There are no existing surface waters within the city limits or in close proximity to our sanitation system. However, we have surface aerators available at our Industrial and Domestic WWTP's that can be transported to a specific site and connected to our large portable generators to provide oxygenation in the event of an overflow that could reach an extremely remote surface water body.

- G. The City has an overflow/emergency response plan in place that outlines methods for response to the site within one hour or less after receiving the initial alert. Major components of the plan include preliminary assessment of the event, call for assistance and equipment as required, establishment of safety corridors and zones, containment at the event site and surrounding areas, restoration of normal flows within the system, decontamination of affected areas, submission of field reports to agencies and final overflow reports to state and local governmental agencies.

## **VII. FOG (FAT, OIL AND GREASE) CONTROL PROGRAM:**

- A. The City has established a tracking and mapping program to identify areas of the sanitation system that are most prone to overflows due to grease accumulations and blockages. We have also undertaken a major line videoing program to verify and assist us in identifying whether these areas may also be in need of repair or replacement maintenance. We monitor manhole flows at these targeted areas on a weekly basis and scour the lines as necessary. Areas of the City under increased scrutiny include the downtown restaurant and dining areas, the older sections of the City and various selected areas throughout the sanitation system.
- B. We have drafted a “Sewer Protection and Grease Abatement Program work Plan”. Components of the Plan include the purpose and scope of the plan, goal and program success measurement tools, use of local news media and other communication tools, proposed staffing and resources, and implementation schedules.

## **VIII. SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN:**

- A. There are no areas within the sewer system that is hydraulically overloaded at the present time to our knowledge.
- B. The City is upgrading sanitation system line in conjunction with road improvement/paving projects. We have established an ongoing priority list of those lines in need of repair or replacement and have incorporated our projects with the street repair improvements to achieve maximum results within our limited budgets. We meet regularly with our Engineering Department to plan for long term maintenance by creating a list of areas that could possibly require repair or replacement in the future, based upon our visual monitoring and video taping programs. Funds can then be set aside each year in anticipation of completing those projects in a timely manner.
- C. We shall continue to expand our project lists as we discover additional areas in need of repair/replacement. We shall continue the current video taping program to enable us to monitor lines we have determined may be in need of maintenance and extend the video program to include other areas of the City that may indicate a need for future repair and/or replacement.
- D. We shall coordinate our efforts with the Engineering and Development Services Departments in order to make changes to the proposed action and improvement schedules. We shall continue to track and evaluate our performance to insure we meet the demands of repair/replacement projects and scheduled line cleaning and maintenance.
- E. The City of Hollister is currently in the process of having a state of the art sewer treatment facility built with a 5 MGD capacity. We are also planning to install an odor control system at our San Felipe lift station and upgrade electrical panel at this location.

**IX. MONITORING, MEASUREMENT AND PROGRAM MODIFICATIONS:**

- A. We shall establish an ongoing timeline for reviewing the effectiveness of the SSMP. The team shall consist of Sanitation Maintenance staff as well as Engineering/Development Services Department personnel to assess needed modifications and changes to our program.
- B. The periodic program review process may incorporate new or modified elements after careful evaluation of existing conditions and how effective the current program has been. We shall consider such elements as response times, areas where rehabilitation is needed, areas where additional monitoring is required and areas where repetitive overflows are occurring.
- C. We shall maintain accurate records and files on our progress regarding the program. The files shall be available for review by authorized personnel and copies of pertinent data and information may be forwarded to appropriate agencies upon proper request.

**X. SSMP PROGRAM AUDITS:**

- A. We shall review our SSMP at regular intervals to determine the adequacy of the program and to make changes and modifications as needed. We shall continue to track overflows as they occur and take appropriate actions to correct or improve areas in need of repair/replacement. The results of our survey shall be conveyed to the Regional Water Quality Control Board and San Benito County Health Department as requested.

**XI. COMMUNICATION PROGRAM:**

- A. We shall send appropriate program reports to the Regional Water Quality Control Board and San Benito County Health Department as is required by all agencies, we shall seek input from both agencies and include appropriate recommendations and suggestions into the SSMP.