



## **ELEMENT 10 - SEWER SYSTEM MANAGEMENT PLAN PROGRAM AUDITS**

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SSMP Audits are required to identify and correct deficiencies in the most current revision of the City's SSMP and provide a schedule to correct identified deficiencies. This SSMP Element outlines the audit process and identifies City Staff responsible for conducting or participating in SSMP Audits and generating the required SSMP Audit Report.

### **10.1 Regulatory Requirements**

WDR Order No. 2006-0003-DWQ Section D.13(x) requires:

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

### **10.2 SSMP Program Audits [WDR D.13(x)]**

The Associate Engineer (Utilities) or their designee is responsible for assuring the next SSMP Audit is conducted and complete prior to the **August 2, 2017** deadline and continuously on a two year interval following this date. Audits should be conducted with cooperation of the Utilities, Community Services, and Engineering Department Staff.

When conducting the SSMP Audit, City Staff must evaluate the effectiveness of each SSMP Element. A comprehensive, effective review of the City's SSMP must be documented in a SSMP Audit Report.

#### **10.2.1 Summary of Procedure:**

1. Gather appropriate documents using the SSMP Data & Records Request, which is provided in Appendix 10A.
2. Write Audit Report referencing all documents reviewed and used as evidence of compliance with the WDR. Create a implementation plan for revisions to the SSMP based on changes in operational strategies or deficiencies found in the SSMP.
3. Evaluate the effectiveness of the City's SSMP and compliance with each WDR requirement using the ranking methodology outlined in Table 10-1.

**Table 10-1: SSMP Audit Ranking Criteria**

<b>Ranking</b>	<b>Ranking Basis</b>
In Compliance	All requirements specified in the element are met.
Substantial Compliance	The majority of requirements in the element are met.
Partial Compliance	Half of the requirements in the element are met.
Marginal Compliance	Less than half of the requirements in the element are met.
Out of Compliance	None of the requirements in the element are met.

The next SSMP Audit Report must be signed and certified by a person designated as described in WDR Section J.1.(i) before August 2, 2017. WDR Section J states:

All applications, reports, or information shall be signed and certified as follows:

- (i) All reports required by this Order and other information required by the State or Regional Water Council shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.)
- (ii) An individual is a duly authorized representative only if:
  - (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and
  - (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

The SSMP Audit Report must be hand signed and certified using the language provided below:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Subsequent SSMP Audits and Management must be conducted continuously on a two year interval following the schedule outlined in Table 10-2 below.

**Table 10-2: SSMP Management Schedule**

Schedule	Activity	Completed
1. August 2, 2009	SSMP Adoption	A SSMP Development Plan was completed in 2007; a SSMP does not appear to have been created or adopted by the City Council
2. August 2, 2011	SSMP Audit	Not Completed
3. August 2, 2013	SSMP Audit	Not Completed
4. August 2, 2014	SSMP 5-Year Update	Not Completed
5. August 2, 2015	SSMP Audit	November 2, 2015
6. September 2016	SSMP Adoption and Revision	February 2017
7. August 2, 2017	SSMP Audit	
8. August 2, 2019	SSMP 5-Year Update	
9. August 2, 2021	SSMP Audit	

To assist in the audit process, the City should consider quarterly or semiannual reviews and revisions to specific SSMP Elements and associated supporting documents. These reviews and revisions will help ensure current operational practices and procedures are reflected in the SSMP and documentation of these activities is readily available during an audit by the Regional Water Quality Control Board, State Water Resources Control Board, or United States Environmental Protection Agency.

SSMP Audit Reports must be kept on file with the SSMP and available to regulators and the public upon request. City SSMP Audit Reports are included in Appendix 10B.

## **APPENDIX 10A**

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City of Hollister

*SSMP Data & Records Request*

## SSMP DATA & RECORDS REQUEST

A. SSMP ADMINISTRATIVE		YES	LOCATED WHERE?	NO	N/A	COMMENTS
A1	a. Has your agency enrolled in the State-wide GWDR and designated the responsible or authorized representative (LRO)?					
	b. Provide a copy of the SSMP Certification in CIWQS.					
	c. Provide a copy of the CIWQS print-out for all LROs and Data Submitters.					
	d. Provide a copy of your Operational Report from CIWQS.					
A2	a. Has your agency adopted a SSMP?					
	b. Provide a copy of the SSMP.					
	c. Provide a copy of the Meeting Minutes for the agency governing body's meeting during which the SSMP was adopted.					
A3	a. Does your agency have a copy of the GWDRs available to agency staff? Where is it kept?					
B. GOALS		YES	LOCATED WHERE?	NO	N/A	COMMENTS
B1	a. Has your agency developed SSMP and SSO reduction goals?					
	b. Provide documentation that your agency has made progress toward meeting these goals.					
C. ORGANIZATION		YES	LOCATED WHERE?	NO	N/A	COMMENTS

**SSMP DATA & RECORDS REQUEST**

C1	a.	Does your SSMP clearly identify the names and job titles the LROs?					
C2	a.	Does your SSMP have an organizational chart or table showing individual roles and responsibilities for implementation of the SSMP?					
	b.	Are names, titles, and telephone numbers provided in this chart or table?					
C3	a.	Is the chain of communication for reporting SSOs included in the SSMP?					
	b.	Are names, titles, and telephone numbers provided in this chain of communication?					

## SSMP DATA & RECORDS REQUEST

D. LEGAL AUTHORITY		YES	LOCATED WHERE?	NO	N/A	COMMENTS
D1 a.	Provide the sanitary sewer system use ordinances, service agreements, or other legally binding procedures or documents, which demonstrates the agency's legal authority:					
b.	Prohibit illicit discharges					
c.	Require that sewers and connections be properly designed and constructed					
d.	Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency					
e.	Limit the discharge of fats, oils, and grease and other debris that may cause blockages					
f.	Enforce any violation of its sewer ordinances					
E. OPERATIONS AND MAINTENANCE (O&M)		YES	LOCATED WHERE?	NO	N/A	COMMENTS
E1 a.	Provide the following documents:					
b.	An updated map of the agency's sanitary sewer system					
c.	A schedule for maintenance and cleaning of the sanitary sewer system.					
d.	Documentation for maintenance and cleaning of the sanitary sewer system.					
e.	Documentation for scheduled and conducted activities, such as work orders and/or reports and invoices from contractors.					



**SSMP DATA & RECORDS REQUEST**

f.	The O&M contract if the agency's collection system is operated and maintained by a contract operations firm.					
g.	The agency's Rehabilitation and Replacement Plan					
h.	» Summary of the agency's CCTV program and schedule. Include samples of inspections and summary of findings.					
i.	» List of current and planned projects					
j.	» Time schedule for planned projects					
k.	» Schedule for developing the funds needed for the capital improvement plan					
l.	Training records for staff operations and maintenance activities and contractor operations and maintenance activities.					
m.	» All applicable licenses and certifications required for agency or contract staff. Provide documents stating this requirement.					

## SSMP DATA & RECORDS REQUEST

E. OPERATIONS AND MAINTENANCE (O&M) [CONTINUED]						
		YES	LOCATED WHERE?	NO	N/A	COMMENTS
n.	Equipment and replacement part inventories, including identification of critical replacement parts.					
o.	» If critical replacement parts are not kept in stock, identify and provide method in which these parts are acquired when needed.					
p.	» If critical replacement parts are not kept in stock, provide applicable mutual aid agreements.					
F. DESIGN & PERFORMANCE STANDARDS						
		YES	LOCATED WHERE?	NO	N/A	COMMENTS
F1 a.	Provide the following documents:					
b.	Design and construction standards and specifications for:					
c.	» the installation of new sanitary sewer systems					
d.	» pump stations and other appurtenances specific to the agency's collection and conveyance system					
e.	» the rehabilitation and repair of existing sanitary sewer systems					
f.	Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances specific to the agency's collection and conveyance system and for rehabilitation and repair projects.					
G. OVERFLOW EMERGENCY RESPONSE PLAN						
		YES	LOCATED WHERE?	NO	N/A	COMMENTS
G1 a.	Provide the agency's Overflow Emergency Response Plan					

### SSMP DATA & RECORDS REQUEST

b.	Notification procedures ensuring that the primary responders and regulatory agencies are informed of all SSOs in accordance with the Monitoring and Reporting Program, Order No. 2008-0002-EXEC.					
c.	A program to ensure an appropriate response to all overflows.					
d.	Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained.					
e.	Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities.					
f.	A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States.					
g.	A program to ensure that all reasonable steps are taken to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.					

## SSMP DATA & RECORDS REQUEST

H. FOG CONTROL PROGRAM		YES	LOCATED WHERE?	NO	N/A	COMMENTS
H1 a.	Provide the agency's Fats, Oils, and Grease (FOG) Control Program.					
b.	Justification for why the agency does not have a FOG Control Program, because one is not needed.					
c.	Evidence of the agency's public education outreach program that promotes proper disposal of FOG.					
d.	List of acceptable FOG disposal facilities.					
e.	Ordinance demonstrating the agency's legal authority to prohibit FOG discharges to the system and inspect FOG producing facilities.					
f.	Evidence of FOG Control Program inspection and enforcement activities.					
g.	Documentation of hot spots in the collection system, which are caused by FOG.					
I. SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN		YES	LOCATED WHERE?	NO	N/A	COMMENTS
I1 a.	Provide the agency's System Evaluation and Capacity Assurance Plan (SECAP).					
b.	Evaluation determining whether the SECAP is necessary.					
c.	The agency's capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event.					

**SSMP DATA & RECORDS REQUEST**

d.	Program for the evaluation of system hydraulic deficiencies.					
e.	Evidence of design criteria utilized to address hydraulic deficiencies.					
f.	Short- and long-term CIP schedule necessary to address hydraulic deficiencies.					

## SSMP DATA & RECORDS REQUEST

SSMP DATA & RECORDS REQUEST						
J. MONITORING, MEASUREMENT & PROGRAM MODIFICATION:		YES	LOCATED WHERE?	NO	N/A	COMMENTS
J1 a.	Provide the following documentation, which demonstrates the following:					
b.	Prioritization of appropriate SSMP activities.					
c.	Efforts to monitor implementation and measure the effectiveness of the SSMP.					
d.	Assessment of the preventative maintenance program.					
e.	Updates to program elements.					
f.	Identification of SSO trends.					
g.	Evidence of mandatory information required by the Monitoring and Reporting Program, Order No. 2008-0002-EXEC, such as the CIWQS SSO supporting documentation.					
K. SSMP PROGRAM AUDITS		YES	LOCATED WHERE?	NO	N/A	COMMENTS
K1 a.	Provide historical SSMP Program Audit Reports.					
L. COMMUNICATION PROGRAM		YES	LOCATED WHERE?	NO	N/A	COMMENTS
L1 a.	Provide the agency's Communication Program and evidence of its implementation.					