

**City of Hollister
Sewer System Management Plan, Revision 0 – 2007
Audit Report**

November 2, 2015

Prepared By:



WALLACE GROUP[®]

CERTIFICATION

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.

Danny Hillstock, PE

Associate Engineer: Utilities – City of Hollister

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SCOPE AND PURPOSE

The State Water Resources Control Board (SWRCB) Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003-DWQ as amended by WQ 2013-0058-EXEC (herein SSSWDR Orders) require municipalities that own or operate sanitary sewage collection systems greater than one mile in length to implement and maintain a Sewer System Management Plan (SSMP). The City of Hollister sewage collection system is greater than one mile in length and discharges to a publically owner treatment works therefore the City is required to comply with the terms of the Statewide Order.

The City has contracted with Wallace Group to complete an Audit of the City's current SSMP in order to evaluate the effectiveness of the SSMP and its implementation.

The SSMP Audit measures compliance with section D.13 of the SSSWDR Orders and the effectiveness of the City's implementation of the current certified SSMP; Revision 0 dated 2007

- 1.0 [SSSWDR, Section D.13.i]: Goals
- 2.0 [SSSWDR, Section D.13.ii]: Organization
- 3.0 [SSSWDR, Section D.13.iii]: Legal Authority
- 4.0 [SSSWDR, Section D.13.iv]: Operation and Maintenance Program
- 5.0 [SSSWDR, Section D.13.v]: Design and Performance Provisions
- 6.0 [SSSWDR, Section D.13.vi]: Overflow Emergency Response Plan
- 7.0 [SSSWDR, Section D.13.vii]: Fats, Oils, and Grease Control Program
- 8.0 [SSSWDR, Section D.13.viii]: System Evaluation and Capacity Assurance Plan
- 9.0 [SSSWDR, Section D.13.ix]: Monitoring, Measurement, and Program Modifications
- 10.0 [SSSWDR, Section D.13.x]: Sewer System Management Plan Program Audits
- 11.0 [SSSWDR, Section D.13.xi]: Communication Program

AUDIT FORMAT

This SSMP Audit separately evaluates each SSMP Section using the following format:

- Applicable SSSWDR Section
- Audit Finding
- Ranking
- Reference Information
- Deficiencies
- Recommended steps and schedule to correct Deficiencies

The ranking criteria utilized in the Audit are provided in Table 1 below:

Table 1: SSMP Audit Ranking Criteria

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

SSMP AUDIT PARTICIPANTS AND SCHEDULE

This SSMP Audit assesses the effectiveness of the City’s SSMP Revision 0, dated 2007, and compliance with the SSSWDR Section D.13 requirements. The purpose of the Audit is to recognize accomplishments, identify deficiencies, and recommend corrective actions and a schedule to complete them.

The Audit was conducted by the following Wallace Group Staff:

- Bill Callahan
Director Public Works Administration – Wallace Group

Hollister Staff participating in the SSMP Audit:

- Danny Hillstock, PE
Associate Engineer: Utilities – City of Hollister
- Lori Marra
Senior Support Services Assistant – City of Hollister
- Michael Grzan
Utilities Technician – City of Hollister

The SSMP Audit was conducted in October 2015, the following table summarizes key dates and locations:

Table 2: City of Hollister SSMP, Revision 0, 2007 Audit Key Dates

Date	Location	Topic	Staff
September 9, 2015	WG Office	Submitted Data and Records Request to City.	Bill Callahan, Danny Hillstock
October 20, 2015	City Engineering Office	SSMP Audit Kick Off, SSMP Data and Records Request reviewed and records gathered, begin drafting Audit Report.	Bill Callahan, Danny Hillstock, Lori Marra, Michael Grzan
October 29, 2015	City Engineering Office	SSMP Draft Audit Report Submitted for Review	Bill Callahan, Danny Hillstock
November 2, 2015	City Engineering Office	SSMP Audit Final Report	Bill Callahan, Danny Hillstock

CITY 2015 SSMP AUDIT RESULTS

The SSMP Audit resulted in a finding that the City of Hollister SSMP dated 2007 is in full compliance with one out of eleven subsections (elements) of SSSWDR Section D.13, partial compliance in three of the elements and marginal or out of compliance in seven of the elements. The City has been partially effective in implementation of the SSMP.

It should be noted that a formal record of SSMP adoption was not available at the time of this Audit. The City's CIWQS records show the City's effective date of enrollment with the 2006-0003-DWQ WDRs on December 28, 2006. Based on the review and audit of the City's SSMP, it appears an initial effort was made to address the requirements of the SSSWDRs by development of a "SSMP Development Guide" which outlines the general requirements for each Element of the SSMP. In addition to these guidelines, the City incorporated a brief summary on how it plans to comply with the requirements of each Element and its subsections. A complete SSMP with supporting programs and procedures has not been developed as of this date. It is important to note that the City is meeting some of these SSSWDR requirements "in practice", however the SSMP does not refer to the majority of these practices and there is minimal documentation to demonstrate a record of these activities.

A summary of the results is presented in Table 3 below:

Table 3: City of Hollister SSMP 2007 - Audit Results 2015

SSSWDR Section D.13	SSMP Compliance with Required Subsection	City Effectiveness in the Implementation of SSMP Subsections	Schedule
1.0 Goals [SSSWDR D.13(i)]	In Compliance	The goals provided were not all measurable due to the lack of records pertaining to the goals stated. The City can improve its effectiveness in implementing this section.	Develop new Goals specific to the City's system that are measurable and achievable by January 2016.
2.0 Organization [SSSWDR D.13(ii)]	Out of Compliance	The City has been ineffective in implementing this section as it is out of date and incomplete. This Element does not include the necessary information required for compliance with SWRCB 2013 Monitoring and Reporting Requirements.	Update the Organization Section by February 2016.
3.0 Legal Authority	In Partial Compliance	The City Municipal Code currently contains the required	Update this section of the

SSSWDR Section D.13	SSMP Compliance with Required Subsection	City Effectiveness in the Implementation of SSMP Subsections	Schedule
[SSSWDR D.13(iii)]		legal authorities to manage discharges to the Public Sewers. Staff utilizes these Codes to manage the City's system. These Code sections are not comprehensively identified in the City SSMP.	SSMP to incorporate specific sections of the Municipal Code as they pertain to subsections of this Element by February 2016.
4.0 Operation and Maintenance Program [SSSWDR D.13(iv)]	Marginal Compliance	<p>The City was partially effective in implementing this section.</p> <p>Updates are required to incorporate a formal plan and schedule for sewer line cleaning, manhole inspections, CCTV inspections, staff training, and rehabilitation and repair activities. A Capital Improvement Plan (CIP) and critical parts inventories are required to be developed and included in this section.</p>	Update the Operations and Maintenance Program Section by February 2016
5.0 Design and Performance Provisions [SSSWDR D.13(v)]	Partial Compliance	<p>The City has been effective in implementing these standards; however the 2013 Design Standards, Standard Specifications and Standard Plans should be incorporated into the SSMP with a reference to their electronic location or book location.</p>	Include the 2013 City Design Standards, Standard Specifications and Standard Plans in the next Update to the SSMP by February 2016.
6.0 Overflow Emergency Response Plan [SSSWDR D.13(vi)]	Out of Compliance	<p>The City has been ineffective at developing and implementing a comprehensive Overflow Emergency Response Program (OERP). Currently only portions of a program exist and this program requires</p>	Develop a comprehensive OERP with supporting procedures by February 2016. Train staff on this program

SSSWDR Section D.13	SSMP Compliance with Required Subsection	City Effectiveness in the Implementation of SSMP Subsections	Schedule
		significant updating to comply with current regulations.	and associated procedures. Document all staff training by March 2016.
<p>7.0 Fats, Oils and Grease (FOG) Control Program [SSSWDR D.13(vii)]</p>	<p>Marginal Compliance</p>	<p>The City has been ineffective in implementing the FOG Program identified in the 2007 SSMP. FOG accounts for 81% of the City's SSOs.</p>	<p>Conduct an assessment of FOG Program needs and develop a plan to move forward with a comprehensive FOG Control Program by February 2016. Include program in the SSMP Update.</p>
<p>8.0 System Evaluation and Capacity Assurance Plan (SECAP) [SSSWDR D.13(viii)]</p>	<p>Partial Compliance</p>	<p>The City was only partially effective at implementing this section as identified in the 2007 SSMP</p>	<p>Incorporate a summary of results found in the Sewer Collection System Master Plan (SCSMP) in the update to the SSMP. Include a schedule and plan for implementation of the projects listed in the SCSMP along with sources of funding by February 2016.</p>
<p>9.0 Monitoring, Measurement, and Program Modifications</p>	<p>Out of Compliance</p>	<p>The City was ineffective at implementing this section as identified in the 2007 SSMP</p>	<p>Develop an assessment matrix and incorporate the</p>



SSSWDR Section D.13	SSMP Compliance with Required Subsection	City Effectiveness in the Implementation of SSMP Subsections	Schedule
[SSSWDR D.13(ix)]			Annual SSMP Assessment into the Appendix of this SSMP by February 2016.
10.0 SSMP Program Audits [SSSWDR D.13(x)]	Marginal Compliance	The City has been marginally effective at implementing this section. The first SSMP Audit was due on or before August 2, 2011, with subsequent 2 year Audits due in 2011 and 2013. The first Audit was completed in October 2015. Wallace Group recommends that the City use a maintenance calendar to schedule the next SSMP Audit which will be due on or before August 2, 2017.	Update SSMP Program Audits Section by February 2017.
11.0 Communication Program [SSSWDR D.13(xi)]	Out of Compliance	The City was ineffective in implementing this section of the SSMP. Future SSMP revisions should develop and document Communication Program efforts conducted in 2015 in the appendix for this section of the SSMP. Identify systems that are satellite to your collection system and document any communications conducted with them relevant to the City's SSMP and supporting programs.	Update Communication Program by February 2016.

The following sections describe these observations in detail and address future additions and updates the City is required to make to its SSMP. The table provided above is a summary and is not intended to replace the detailed deficiencies identified in the SSMP Audit Report. These SSMP Audit Report recommendations should be implemented in a reasonable time frame, and should be included in the next SSMP Update to ensure compliance with the SSS WDR Orders.



It is important to note that moving forward the City must adhere to the schedules identified in the SSSWDRs for completion of bi-annual SSMP Audits and SSMP 5-Year Updates. 5-Year Updates are required to be re-certified by the City Council when significant changes are made to this document.

Based on the City's population and the schedule identified in the 2006 SSSWDRs, the City is required to conduct their next Audit on or before August 2, 2017. The SSMP 5-Year Update was required to be completed on or before August 2, 2014. The City should develop a complete SSMP and certify with the City Council as soon as possible and complete the next 5-Year Update and re-certify on or before August 2, 2019.

1.0 Goal [SSSWDR D.13(i)]

SSSWDR D.13(i) states:

The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

Section D.13(i): The City of Hollister (City) SSMP, Revision 0 dated 2007 includes one (1) goal listed below.

- The goal of the City of Hollister SSMP is to prevent overflows and to implement a response plan to scheduling preventative measures for the elimination of future overflows.

Element 1 Sufficiency: Substantial Compliance

Reference: City SSMP, Revision 0, 2007 Page 6.

Deficiencies: While the SSMP goal are appropriate from a programmatic standpoint, we recommend the City revise the number of goals to three (3) to five (5) goals which are specific to the City's operations and maintenance of the sewer system and develop objectives to meet these goals that are specific and can be performed in the next two (2) years. This will allow these goals to be assessed and revised as necessary. There is currently no evidence supporting the implementation or achievement of the goal identified above.

Recommendation: The City should revise the number of goals to no more than five (5). The goals should be Specific, Measureable, Attainable, Realistic, and Timely (SMART). The updated goals should be included in the SSMP Update.

2.0 Organization [SSSWDR D.13(ii)]

SSSWDR D.13(ii) states:

The SSMP must identify:

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

Finding: *Section D.13 (ii)(a):* The Collection System Supervisor: Clay Lee is the named Legally Responsible Official (LRO) for the City on the City's CIWQS Facility-At-A-Glance Report. The City's SSMP however does not identify a LRO in this section.

Conclusion: The section above is in marginal compliance with *Section D.13 (ii)(a)*.

Finding: *Section D.13(ii)(b):* The names and telephone numbers of staff holding the following positions are included in this section of the SSMP:

- Community Services Director – Clayton Lee
- City Engineer Manager – Steve Witry
- Utilities Supervisor – Henry Gonzales
- Senior Maintenance Worker – Pete Galvan

The names and positions associated with these positions require updating. There is no identification of SSMP roles and responsibilities or organizational chart associated with these individuals and their responsibilities related to SSMP management and implementation.

Conclusion: The section above is out compliance with *Section D.13(ii)(b)*.

Finding: *Section D.13(ii)(c):* A brief summary of communication for reporting sanitary sewer overflows (SSOs) is provided on Page 12 of the SSMP. The summary of communication does not incorporate the information required in the recently adopted 2013 Monitoring and Reporting amendments. These amendments identify three Categories of SSOs rather than two and now require all spill information to be reported to Cal OES. The summary lacks the detail required in this subsection for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and Cal OES.

Conclusion: The section above is out of compliance with *Section D.13(ii)(c)*. See recommendations below.

Element 2 Sufficiency: Out of Compliance

Reference: City SSMP, Revision 0, 2007, Page 12, CIWQS Facility At-A-Glance Report (October 19, 2015).

Deficiencies: Staff roles and responsibilities for the management and implementation for the SMP are not identified. A SSO Response Chain of Communication is not included in the SSMP and the summary included for notification and reporting is out of date with SWRCB 2013 Monitoring and Reporting Requirements.

Recommendation: Update this Element as identified above for compliance with 2013 Monitoring and Reporting Requirements. Update all City staff contact information on an ongoing basis so this information is current and up to date. Include all wastewater staff phone numbers in future updates to the SSMP. Develop a list of staff responsible for the management and implementation of each section of the SSMP. Identify their specific SSMP roles and responsibilities.

3.0 Legal Authority [SSSWDR D.13(iii)]

SSSWDR D.13(iii) states:

Each Enrollee must demonstrate, through sanitary system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- (a). Prevent illicit discharges into its sanitary sewer system (examples include I/I, storm water, chemical dumping, unauthorized debris and cut roots, etc.);
- (b). Require that sewers and connections be properly designed and constructed;
- (c). Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
- (d). Limit the discharge of fats, oils, and grease and other debris that may cause blockages; and
- (e). Enforce any violation of its sewer ordinances.

This section was reviewed against the following sections of the City of Hollister Municipal Code which are referenced in the City SSMP Revision 0, 2007:

- City Municipal Code:
 - Title 13.04 Articles I – IX: Sewer Service System

Finding: *Section D.13(iii)(a)*: Illicit discharges such as storm water, debris, chemicals, waste, debris that obstruct, etc. are addressed in the following sections of City Municipal Code and referenced on page 13 of the City SSMP:

- City Municipal Code Referenced in SSMP:
 - Title 13.04 Article II: 13.04.220 – Surface Runoff Prohibited in Sewer
- Portions of City Municipal Code not referenced in SSMP that meet requirements for this section:
 - Title 13.04 Article II: 13.04.070 – Certain Water Prohibited from Sanitary Sewer
 - Title 13.04 Article II: 13.04.090 - Materials Prohibited in Sewers
 - Title 13.04 Article II: 13.04.100 – Materials Director May Prohibit

Conclusion: The section above is in partial compliance with *Section D.13(iii)(a)*.

Finding: *Section D.13(iii)(b)*: Proper design and construction of private connections are addressed in the following City Municipal Code Sections:

- City Municipal Code Sections Referenced in SSMP:

- Title 13.04 Article III: 13.04.200 – Construction Codes and Standards
- Portions of City Municipal Code not referenced in SSMP that meet requirements for this section:
 - Title 13.04 Article III: 13.04.210 – Sewer Elevation: Backflow and Check Device
 - Title 13.04 Article III: 13.04.230 – Inspection of Construction
 - Title 13.04 Article III: 13.04.240 – Protective Devices During Construction

Conclusion: The section above is in partial compliance with *Section D.13(iii)(b)*.

Finding: *Section D.13(iii)(c)*: City currently does not own and therefore does not require access to maintain or repair any portion of a Lateral Sewer, House Sewer or House Drain. The City's SSMP does not refer to applicable sections of the Code that meet this requirement. Article III of Title 13.04.170 – Responsibility for Costs and Expenses summarizes the property owners responsibilities for sewer lateral ownership, maintenance and upkeep.

Conclusion: The section above is in partial compliance with *Section D.13(iii)(c)*.

Finding: *Section D.13(iii)(d)*: City has the authority to limit the discharge of FOG and other debris that may cause blockages into the system in the sections of code specified below:

- City Municipal Code Section Referenced in SSMP:
 - Title 13.04.100 - Materials Director May Prohibit
- Portions of City Municipal Code not referenced in SSMP that meet requirements for this section:
 - 13.04.120 - Grease Traps Required

Conclusion: The section above is in partial compliance with *Section D.13(iii)(d)*.

Finding: *Section D.13(iii)(e)*: City has the authority to enforce any violation of its sewer ordinances in the sections of the Municipal Code specified below, however these sections of the Code are not referenced in the City's SSMP:

- Article VII Enforcement:
 - Title 13.04.490 – Notification of Potential Problems
 - Title 13.04.500 – Notices to Employees
 - Title 13.04.520 – Issuance of Cease and Desist Orders
 - Title 13.04.530 – Harmful Contributions
 - Title 13.04.540 – Submission of Time Schedule
- Article VIII Abatement:
 - Title 13.04.560 – Public Nuisance

- Title 13.04.570 - Injunction
- Title 13.04.580 – Damage to Facilities
- Title 13.04.590 – Correction of Violations: Collection of Costs - Injunction
- Title 13.04.600 – Civil Liabilities and Penalties
- Title 13.04.610 – Falsifying Information
- Title 13.04.620 – Termination of Service

Conclusion: The section above is in marginal compliance with *Section D.13(iii)(e)*.

Element 3.0 Sufficiency: In Partial Compliance

Reference: City SSMP, Revision 0, 2007 Pages 13-14, City of Hollister Municipal Code Title 13.04 Articles I – IX: Sewer Service System.

Deficiencies: Specific applicable sections of the City Municipal Code are not included in the City's SSMP.

Recommendation: Update this section to include specific sections of the City's Municipal Code that apply to each subsection of this Element. Include associated Sections of the Code in the Appendix of the SSMP.

4.0 Operation and Maintenance Program [SSSWDR D.13(iv)]

SSSWDR D.13(iv) states:

The SSMP must include those sections listed below that are appropriate and applicable to the Enrollee's system:

- (a). Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable storm water conveyance facilities;
- (b). Describe routine preventive and operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) Program should have a system to document scheduled and conducted activities, such as work orders;
- (c). Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed to the capital improvement plan;
- (d). Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
- (e). Provide equipment and replacement part inventories, including identification of critical replacement parts.

Finding: *Section D.13(iv)(a)*: All major sewer assets and appurtenances are identified in the City's GIS Sewer Atlas Map: 2010. City staff utilizes paper sewer atlases to locate specific sewer assets and track sewer line cleaning. The City also maintains a storm water collection conveyance map for storm water assets that may be impacted by a SSO, however this is not discussed in the SSMP. There was no evidence at the time of this audit to show this map has been updated to reflect changes to the collection system since 2010.

Conclusion: The section above is in substantial compliance with *Section D.13(iv)(a)*. See recommendations section below.

Finding: *Section D.13(iv)(b)*: The 2007 City SSMP provides a brief summary of Routine Preventative Operation and Maintenance (O&M) for Pipelines, Manholes, and Lift Stations.

Sewer line cleaning and routine visual inspections are performed by City staff. There was no documentation tracking the results of these activities during the audit. The City SSMP discusses sewer line cleaning occurring on a rotational schedule with “seriously affected lines” cleaned 2 - 3 times per year and the rest of the system cleaned every 6-12 months. Staff reported that these cleaning efforts are generally tracked on a system overview map however a current cleaning map was not available during the audit.

The City should clarify its annual goals for line cleaning in the next SSMP update as the current version refers to a vague schedule without a formal means to document cleaning of the system. Areas needing more frequent cleaning, “High Maintenance Areas” are not included in the SSMP but were found in a list provided by staff and also in the 2010 SSCSMP. These Hot Spots are monitored daily according to City staff and cleaned as necessary.

The City’s SSMP reports that a CCTV is currently performed on problem lines. While City staff reports that CCTV data exists, no schedule, or criteria for conducting these inspections was located during the audit. There is not currently a plan and schedule for a formal CCTV inspection program.

Operation and Maintenance for the (4) four City Lift Stations is also conducted by City staff on a daily basis. These lift stations are inspected daily with observations logged in a “lift station log”. The City SSMP generally refers to operations and maintenance conducted at these lift stations. The next update to the SSMP should clearly define a plan and schedule for the operation and maintenance of these stations.

The City SSMP does not discuss the inspection of manholes or other assets such as manholes or other sewer related appurtenances such as force mains and air/vacuum relief valves.

The results of future sewer line cleaning and manhole inspections should be tracked and included in the SSMP on a semi-annual basis. This summary should include flow conditions, cleaning activities and their effectiveness, and the physical condition of each manhole. A summary of; visual and CCTV investigations, sewer line cleaning, manhole and other pertinent inspection records should be included in the SSMP to assist in the development of future rehabilitation and replacement projects within the collection system.

Conclusion: The section above is in marginal compliance with *Section D.13(iv)(b)*. See recommendations section below.

Finding: *Section D.13(iv)(c)*: The City SSMP does not discuss a formal Rehabilitation and Replacement Plan which is based on CCTV or other investigative efforts. There is some discussion of reactive CCTV investigations which have resulted in rehabilitation and replacement of defective sewer lines; however the SSMP does not provide the supporting information to demonstrate where and when these activities occurred. A Capital Improvement Plan is not mentioned along with methods of funding for associated capital projects.

It is important to note that the 2010 SSCSMP does identify capacity related CIPs however this report does not rely on visual observations of sewer lines in the system which are critical for the identification, analysis and prioritization of City sewer lines that may require rehabilitation and replacement.

Conclusion: The section above is out of compliance with *Section D.13(iv)(c)*. See recommendations section below.

Finding: *Section D.13(iv)(d)*: The 2007 SSMP states that staff are trained in various safety and proficiency programs and that staff are required to complete courses necessary to keep them proficient and safe in the performance of their duties.

The City's Lead Worker for the sewer system holds a certification with the California Water Environment Association (CWEA) Technical Certification Program for Collection System Maintenance. Training procedures and records for O&M related activities were not available at the time of this Audit.

Conclusion: The section above is out of compliance with *Section D.13(iv)(d)*. See recommendations section below.

Finding: *Section D.13(iv)(e)*: A list of collection system critical equipment is discussed in the City's SSMP. The City describes the maintenance of critical parts and equipment as a "use and reorder" system where parts and equipment are kept in sufficient quantity to allow for "multiple emergency and routine usages". A critical parts and equipment list, as described in the SSMP was not available at the time of this audit. The City did produce a Public Works Equipment Vehicle List which shows vehicles and some equipment used to maintain the City's system. This list does not fulfill the requirements of this section of the SSMP which requires the identification and listing of all critical parts and equipment that may be used in an emergency and for the general maintenance of the sewer system.

This list should be updated to identify specific parts and equipment that may be necessary in an emergency and include critical parts necessary to repair specific pieces of critical equipment. If mutual aid agreements exist with neighboring agencies for assistance with emergency response, those agreements should be identified in the SSMP. If contractors and/or spare parts and equipment are not retained by the City on call or as inventory, a list of contractors and/or parts and equipment suppliers should be identified with associated contracts and contact information.

Conclusion: The section above is out of compliance with *Section D.13(iv)(e)*. See recommendations section below.

Sufficiency: Marginal Compliance

Reference: City SSMP Rev 0, 2007, CWEA Certificate: Henry Gonzalez, Public Works Vehicle List, Hot Spot List, Lift Station Logs.

Deficiencies: A sewer and storm water atlas is not included in the City's SSMP. A sewer and storm water atlas would allow operations staff to quickly identify portions of the storm water system that may be impacted by a SSO. Changes to the City's sewer atlas are not documented and there is no formal process to track these changes. The City has not conducted CCTV investigations or completed Rehabilitation Projects identified in the SCSMP. A formal program for O&M activities and the development of Rehabilitation and Replacement Projects is not included in the SSMP. A mechanism for funding Rehabilitation and Replacement Projects is not found in the SSMP. A critical parts and equipment list has not been updated for City owned assets. An updated formal training program and training records are not available reflecting the City's current SSMP and O&M staff training efforts.

Recommendation: Sections of the O&M Program to be created and documented in the next SSMP revision include:

- Future updates to the City's GIS Mapping System should be referenced and integrated into revisions to this SSMP. This update should include a map of the City's storm water system. A formal process for updating these maps should be developed.
- Develop a formal O&M Program that identifies all sewer assets and appurtenances and create a plan and schedule to maintain these assets. Keep a work history record of these activities.
- Develop a program for implementing a CCTV and manhole assessment program. Include documentation and a summary of CCTV, and manhole inspection results as they occur over the course of future Fiscal Years.
- Develop a formal Rehabilitation and Replacement (R&R) plan that incorporates CCTV sewer line condition assessments and future manhole inspection data. Develop a short- and long-term CIP completion schedule based on the results of these inspections along with methods to fund these projects.
- The results of future sewer line cleaning and manhole inspections should be tracked and included in the SSMP on a semi-annual basis.
- The FY 2015/16 and future Budgets should be included in future revisions of the SSMP to identify pending projects for this Fiscal Year.
- Update lists associated with critical parts and equipment necessary for the operation and maintenance of City assets. If parts and equipment are not planned to be stocked by the City, document the vendors for these items, contact information, and lead time for parts not in stock. If mutual aid agreements exist for assistance with emergency response, they should be included in the SSMP.
- Develop training procedures specific to City O&M activities and train on these procedures annually. Maintain documentation of this training.

5.0 Design and Performance Provisions [SSSWDR D.13(v)]

SSSWDR D.13(v) states:

- (a). Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations, and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and
- (b). Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

Finding: *Section D.13(v)(a)*: The City states in the SSMP that it utilizes the following for design and construction standards:

- Standard Specifications for Public Works Construction: 2003 Edition
- City Engineering Department Design Standards, Standard Specifications, Standard Plans: 1992
- Uniform Plumbing Code
- Title 13.04.200 of the City Municipal Code

Design and construction provisions for buildings and public sewers are discussed in the City Design Standards, Standard Specifications, and Standard Plans: as referred to above, however these Plans and Specifications were updated in 2013.

Conclusion: The section above is in substantial compliance with *Section D.13(v)(a)*.

Finding: *Section D.13(v)(b)*: Procedures and standards for the acceptance testing and inspection of new and repaired sewer main and appurtenances are also found in the previously mentioned; Design Standards, Standard Specifications, and Standard Plans: Section 306-Underground Conduit Construction. Testing methods for additional sewer appurtenances are developed on a case by case basis and incorporated into individual plan sets for each project. This section of the SSMP should be updated to match current Design Standards, Specifications and Testing Methods.

Conclusion: The section above is in partial compliance with *Section D.13(v)(b)*.

Element 5.0 Sufficiency: Partial Compliance

Reference: City SSMP, Revision 0, 2007, City of Hollister Design Standards, Standard Specifications and Standard Plans: 2013, City of Hollister Municipal Code Chapter 13.04.

Deficiencies: References to the City's Design Standards, Standard Specifications and Standard Plans: 2013 are not included in the SSMP.

Recommendation: The City's Design Standards, Standard Specifications and Standard Plans: 2013 should be included by reference in the next update to the SSMP for compliance with this

section. These standards should be incorporated into the Appendix of the SSMP during the next update.

6.0 Overflow Emergency Response Plan (OERP) [SSSWDR D.13(vi)]

SSSWDR D.13(vi) states:

Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, the plan must include the following:

- (a). Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- (b). A program to ensure appropriate response to all overflows;
- (c). Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP identifies the officials who will receive immediate notification;
- (d). Procedures to ensure that appropriate staff and contract personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (e). Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (f). A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated or partially treated wastewater to waters of the United States and 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.

Finding: *Section D.13 (vi)(a):* The City's SSMP provides a generic overview of the notification process to allow primary responders and regulatory agencies are informed of a SSO in a timely manner. Specific procedures related to primary response and regulatory notifications are not referred to in the SSMP.

Finding: *Section D.13 (vi)(b):* A general description of equipment necessary to respond to a SSO is included in the 2007 SSMP. A program and associated organizational flow chart or summary showing key positions and their responsibility to ensure appropriate response to all overflows is not included in the OERP.

Finding: *Section D.13 (vi)(c):* A general description of the current notification process is included in this section of the SSMP. It has not been updated to comply with State Board Order 2013-0058-EXEC adopted in July 2013 (2013 Monitoring and Reporting Requirements). Specific procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities were not available at the time of this audit. Individual emergency

operating procedures identified below should be developed for compliance with this section of the SSMP:

- SS-EOP: SSO Notification
- SS-EOP: SSO Reporting

Finding: *Section D.13 (vi)(d):* The SSMP did not include specific procedures to ensure appropriate staff and contractor personnel are trained on the OERP. This section does not discuss SSO response procedures and reporting that are up to date and compliant with the 2006 SSSWDRs and 2013 Monitoring and Reporting Requirements. A formal program consisting of specific emergency response procedures was not identified during the Audit.

Finding: *Section D.13 (vi)(e-f):* Procedures to address emergency operations, such as emergency traffic and crowd control, surface water quality monitoring, and other necessary response activities were not identified in the 2007 SSMP. An example of the City's Spill Contingency Response Plan was provided during the Audit however it does not meet the requirements listed above for compliance with the 2006 SSSWDRs and 2013 Monitoring and Reporting Requirements. A formal program consisting of specific emergency response procedures was not identified. Formal procedures that are specific to the City of Hollister should be developed, adopted, and incorporated into the City's Emergency Response Program and referenced in the SSMP. Examples of these procedures are as follows:

- SS-EOP: Overflow Emergency Response Plan
- SS-EOP: SSO Traffic and Crowd Control
- SS-EOP: SSO Volume Estimation
- SS-EOP: SSO Mitigation and Cleanup
- SS-EOP: SSO Response Documentation and Records
- SS-EOP: SSO Water Quality Monitoring
- SS-EOP: SSO Surface Water Body Closure
- SS-EOP: SSO Records and Training Requirements

The City should also consider the development of additional procedures specific to the collection and conveyance system to assist in SSO response and staff training.

Conclusions: The sections above are out of compliance with *Sections D.13 (vi)(a-f)*. See recommendations below.

Element 6.0 Sufficiency: Out of Compliance

Reference: City 2007 SSMP Revision 0, City of Hollister Spill Contingency Response Plan.

Deficiencies: An emergency response program with associated procedures is not included as part of the SSMP. Monitoring and reporting requirements are not in compliance with Monitoring and Reporting Requirements adopted in by the State Water Board in 2013.

Recommendation: Develop a formal emergency response program with supporting SSO response procedures and incorporate into the SSMP. Update the OERP for compliance with the State Water Board 2013 Monitoring and Reporting Program. Train staff annually on this OERP and the associated procedures. Document all staff training. Update each Emergency Operating Procedure and the OERP as conditions warrant.

7.0 Fats, Oils, and Grease (FOG) Control Program [SSSWDR D.13(vii)]

SSSWDR D.13(vii) states:

Each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- (a). An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- (b). A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;
- (c). The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- (d). Requirements to install grease removal devices (such as traps or interceptors) and the development of design standards for such devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- (e). Authority to inspect grease producing facilities, enforcement authorities, and whether the City has sufficient staff to inspect and enforce the FOG ordinance;
- (f). An identification of sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- (g). Development and implementation of source control measures for all sources of FOG discharged to the sewer system for each section identified in (f) above.

After the issuance of the Statewide General WDRs in 2006, the City determined that FOG is an on-going problem in the sewer collection system and a FOG Program was needed. The City estimates there are over (30) thirty Food Service Establishments (FSEs) in its service area. A *review of City SSOs in CIWQS between 2008 and 2015 shows 81% of SSOs have been caused by FOG.*

Finding: *Section D.13(vii)(a):* The City SSMP Revision 0, 2007, page 20, discusses a draft plan to conduct a FOG control program “Sewer Protection and Grease Abatement Work Plan”. At the time of this Audit there was no evidence that this plan has been adopted or implemented. A copy of the plan was not available.

Conclusion: The section above is out of compliance with *Section D.13(vii)(a)*. See recommendations below.

Finding: *Section D.13(vii)(b):* The City SSMP Revision 0, 2007, does not provide a plan and schedule for the disposal of FOG generated within the sanitary sewer system service area or a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area.

Conclusion: The section above is out of compliance with *Section D.13(vii)(b)*.

Finding: *Section D.13(vii)(c):* The legal authority to prohibit discharges to the collection system and identify measures to prevent FOG-caused SSOs is located in Titles; *13.04.100 Materials Director May Prohibit* and *13.04.120 Grease Traps Required* of the City Municipal Code. References to these Codes are not included in the City's SSMP.

Conclusion: The section above is in substantial compliance with *Section D.13(vii)(c)*.

Finding: *Section D.13(vii)(d):* The City Municipal Code Section 13.04.120 *Grease Traps Required*, requires FSEs to install a Fats, Oils, and Grease Control Device when it is determined by the Director of Public Works a trap or interceptor is necessary. There was no evidence at the time of this Audit that development of design standards for such devices, maintenance requirements, BMP requirements, record keeping and reporting requirements have been developed or implemented.

Conclusion: The section above is out of compliance with *Section D.13(vii)(d)*.

Finding: *Section D.13(vii)(e):* The City Municipal Code Title 8.32.070 gives the City the authority to inspect and enforce violations of its Municipal Code. Applicable conditions specific to FOG control are included in Title 13.04. It was unclear at the time of this Audit if the City has sufficient staff to develop and implement a comprehensive FOG Control Program. A program has not been developed as of the date of this Audit. The City's SSMP does not reference "inspection rights" or staffing of a FOG Control Program.

Conclusion: The section above is out of compliance with *Section D.13(vii)(e)*.

Finding: *Section D.13(vii)(f):* The City SSMP, Revision 0, 2007 discusses a "tracking and mapping program" to identify and inspect areas of the collection system ("Hot Spots") which are subject to grease blockages. An interview of City staff produced a list of (45) forty five areas of the collection system that are inspected daily for potential restrictions due to FOG or other issues such as roots. Staff records conditions daily and addresses any conditions that may cause or contribute to a SSO when observed.

Conclusion: The section above is in compliance with *Section D.13(vii)(f)*.

Finding: *Section D.13(vii)(g):* The City SSMP Revision 0, 2007, does not provide information regarding the development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each FOG induced HMA. The City did provide information to demonstrate that these areas were cleaned/inspected as part of regular HMA cleaning and also provided a public outreach and education flyer used to educate commercial and residential customers on proper FOG disposal.

Conclusion: The section above is in marginal compliance with *Section D.13(vii)(g)*.

Sufficiency: Marginal Compliance

Reference:

- SSMP Revision 0, 2007 p. 20;
- City Municipal Code Chapter 13.04 and 8.32.070
- CIWQS SSO Public Report – City of Hollister: Detail Page

Deficiencies: The 2007 SSMP does not include the following:

- Information regarding the development and implementation of a formal FOG Control Program,
- A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area or a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area,
- Design standards for FOG Control Devices, maintenance requirements, BMP requirements, record keeping and reporting requirements have been developed or implemented,
- References to applicable portions of the City Municipal Code relevant to FOG Control
- Evidence that demonstrates sections of the City's Municipal Code have been enforced and or source control measures have been implemented when FOG related SSOs or heavy FOG discoveries have occurred in the collection system.

Recommendation: Current CIWQS data shows that FOG has contributed to approximately 81% of the SSOs experienced by the City between 2008 and 2015. *It should be noted that additional SSOs have been recorded as being caused by "debris" which may include FOG as part of the contributing factor in a SSO.*

The City should develop a formal FOG Control Program and summarize this program in applicable subsections of this SSMP Element. Components of this program should:

- Give a comprehensive overview of FOG Control Requirements for FSEs,
- Develop a program for the regular inspection of FSEs
- Clearly state FOG specific enforcement measures when necessary,
- Include a control mechanism such as a FOG discharge permit,
- Develop a comprehensive education and outreach program,
- Adopt design standards for FOG Control Devices such as Grease Traps and Interceptors
- Provide a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area.

8.0 System Evaluation and Capacity Assurance Plan [SSSWDR D.13(viii)]

SSSWDR D.13(viii) states:

The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system sections for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

- (a). **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to a SSO discharge deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
- (b). **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and
- (c). **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.
- (d). **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D.14.

Findings: *Section D.13(viii)(a-d):* The City SSMP states that there are “no areas within the sewer system that are hydraulically overloaded at the present time”. It does not provide a plan to evaluate portions of the sanitary sewer system that are experiencing or contributing to a SSO discharge deficiency that provide estimates of peak flows associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events. Projects related to capacity deficient areas of the system requiring rehabilitation or replacement are not identified in the SSMP.

The City has completed a Sanitary Sewer Collection System Master Plan (SSCSMP) in 2010 which provides an analysis of existing and future dry weather flow conditions for sewer lines and lift stations. Wet weather flow conditions were not included as part of this analysis as the City has not observed any significant Inflow and Infiltration in their system. Current wet weather

estimates gathered from the City WWTP show a 2% increase in flows due to Inflow and Infiltration which has not had a negative effect on the collection and conveyance system.

Lift Stations

The analysis concludes that all (4) four City owned lift stations are adequate to meet existing capacity needs and (3) three of the (4) will require capacity related upgrades to meet future development demands.

Sewer Lines

The City SSCSMP identifies (9) nine areas of the existing collection and conveyance system that are capacity deficient under existing maximum flow conditions and (12) twelve areas of the existing collection and conveyance system that will be capacity deficient under future build out conditions.

The City SSCSMP also includes design criteria, and capital projects which are ranked to determine priority for future construction. The SSCSMP also recommends a Rate Analysis be performed to support both short and long term projects identified in this report.

Conclusion: The section above is in partial compliance with *Section D.13(viii)(a-d)*. See recommendations below.

Sufficiency: Partial Compliance

Reference: City 2007 SSMP Rev 0; City of Hollister Sanitary Sewer Collection System Master Plan 2010.

Deficiencies: There is no reference to the SSCSMP in the City's SSMP. An updated plan and schedule for completion long and short term CIP is not included in the SSMP, sources of funding for the completion of these CIPs are not included in the SSMP. The status of these CIP was unclear at the time of the Audit. An updated schedule summarizing the status of these projects should be included in the next update to the SSMP.

Recommendation: Incorporate a summary of results found in the SSCSMP in the next update to the SSMP. Also include an updated plan and schedule for completion of the City's long and short term CIP and reference sources of funding for these projects.

9.0 Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]

SSSWDR D.13(ix) states:

The Enrollee shall:

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

Finding: *Section D.13(ix)(a):* The City does not maintain relevant information necessary to establish and prioritized SSMP activities in the SSMP and does not maintain and assess records associated with O&M activities, such as sewer cleaning records, emergency callout records, and emergency work reports. The City should consider developing a plan and schedule to further assess the condition of the collection system and to help evaluate the effectiveness of SSMP related activities.

Conclusion: The section above is out of compliance with *Section D.13(ix)(a)*. See recommendations below.

Finding: *Section D.13(ix)(b) and (c):* The City does not formally evaluate on an annual basis the implementation or effectiveness of each section of the SSMP or preventative maintenance activities.

Conclusion: The section above is out of compliance with *Section D.13(ix)(b) and (c)*. See recommendations below.

Finding: *Section D.13 (ix)(d):* The City SSMP has not been revised since its original development. Revisions must be based on a formal annual monitoring or performance evaluation of each SSMP section and supporting programs.

Conclusion: The section above is out of compliance with *Section D.13 (ix)(d)*. See recommendations below.

Finding: *Section D.13(ix)(e)*: The City SSMP does not track the frequency, location, and cause, of SSOs. There was no evidence that SSO trends were evaluated since the development of the SSMP in 2007.

Conclusion: The section above is out of compliance with *Section D.13(ix)(e)*. See recommendations below.

Sufficiency: Out of Compliance

Reference: City SSMP 2007 Revision 0, Page 22.

Deficiencies: The City did not implement the plan identified in their 2007 SSMP to formally evaluate and update their SSMP based on O&M, Emergency Response and SSO data. Additionally this section requires enrollees to evaluate the implementation or effectiveness of each SSMP Section. These evaluations did not occur.

Recommendation: Implement the written program to schedule, track, and evaluate the effectiveness of preventative maintenance for the sanitary sewer system. Create a plan and schedule to review and assess the effectiveness of each SSMP section annually. Develop a written record of SSO trend evaluation and identification at the end of each calendar year. Complete these plans and records and incorporate them into the update of this SSMP Section.

10.0 Sewer System Management Plan Program Audit [SSSWDR D.13(x)]

SSSWDR D.13(x) states:

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.

Sufficiency: Marginal Compliance

Reference: City SSMP 2007, Revision 0, Page 22.

Deficiencies: The City did not conduct SSMP Audits on a (2) two year interval as required by the WDRs. Based on the City's population of approximately 34,000; the SSMP was due for adoption in August 2009. Audits should have been conducted in 2011, 2013 and 2015 based on the 2009 required adoption date. This Audit (October 2015) is the first conducted by the City to meet this requirement.

Recommendation: The next bi-annual audit is due prior to August 2, 2017, based on the August 2, 2009 required date of adoption. Schedule future SSMP Audits prior to the bi-annual date to ensure compliance with this section utilizing a format that meets the requirements found in Section D. 13 of the SSSWDRs.

11.0 Communication Program [SSSWDR D.13(xi)]

SSSWDR D.13(i) states:

The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.

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

Section D.13 (xi): The City SSMP does not contain the necessary components to ensure adequate communications with stakeholders, the general public and interested parties regarding the development and implementation of the SSMP. There was no record of communications with the City Council regarding the SSMP at the time of this Audit. Discussion at City Council meetings would provide an opportunity for the public to give feedback on the status of the SSMP, future SSMP Updates and Revisions, and its implementation. The City SSMP does not discuss the posting the SSMP on the City's website as required by the 2013 Monitoring and Reporting requirements, however the City has posted a copy of this document on the City's web site.

The City does not identify satellite systems connected to the City sewer system in the SSMP and there has been no formal program for communicating with satellite agencies regarding SSMP related issues.

Sufficiency: Out of Compliance

Reference: City SSMP 2007, Revision 0, Page 23, City of Hollister
website: www.Hollister.ca.gov.

Deficiencies: The City has not developed a formal Communication Program as required Section D13 of the WDRs. City has not identified satellite systems that discharge to the City sewer system or created mechanism for documenting communication that occurs with these satellite systems. Communication Program examples were not found during this audit.

Recommendation: Develop a plan and schedule to create and implement a Communication Program that involves the City Council and members of the public in the next update to the SSMP. Keep a record of all outreach efforts and coordination as supporting documentation for this section of the SSMP. Identify systems that are satellite to your collection system and document any communications conducted with them relevant to the City's SSMP and supporting programs. Post the City's SSMP and supporting documents on the City's web site.

Records List by SSMP Section

- 1.0 Goals – See Records under Sections 3 - 11**
- 2.0 Organization**
 - a. SWRCB CIWQS Facility at a Glance City of Hollister: October 19, 2015
- 3.0 Legal Authority**
 - a. City of Hollister Municipal Code, Chapter 13.
- 4.0 Operation and Maintenance Program**
 - a. Public Works Equipment and Vehicle List
 - b. CWEA Certificate: Henry Gonzalez,
 - c. Sewer Line Hot Spot List,
 - d. Lift Station Logs
- 5.0 Design and Performance Standards**
 - a. City of Hollister Design Standards, Standard Specifications and Standard Plans: 2013,
 - b. City Municipal Code, Chapter 13
- 6.0 Overflow Emergency Response Plan**
 - a. City of Hollister Spill Contingency Response Plan
- 7.0 Fats, Oils, and Grease Program**
 - a. City Municipal Code: Chapter 13,
 - b. CIWQS SSO Public report – City of Hollister Detail Page: October 19, 2015
- 8.0 System Evaluation and Capacity Assurance Plan (SECAP)**
 - a. City of Hollister Sanitary Sewer Collection System Master Plan 2010
- 9.0 Monitoring, Measurement, and Program Modifications**
 - a. SWRCB CIWQS Facility at a Glance and City Operational Report: October 19, 2015
- 10.0 SSMP Audits**
 - a. N/A
- 11.0 Communication Program**
 - a. City of Hollister Website: www.Hollister.ca.gov

APPENDIX 10B

City of Hollister

SSMP Audit Reports