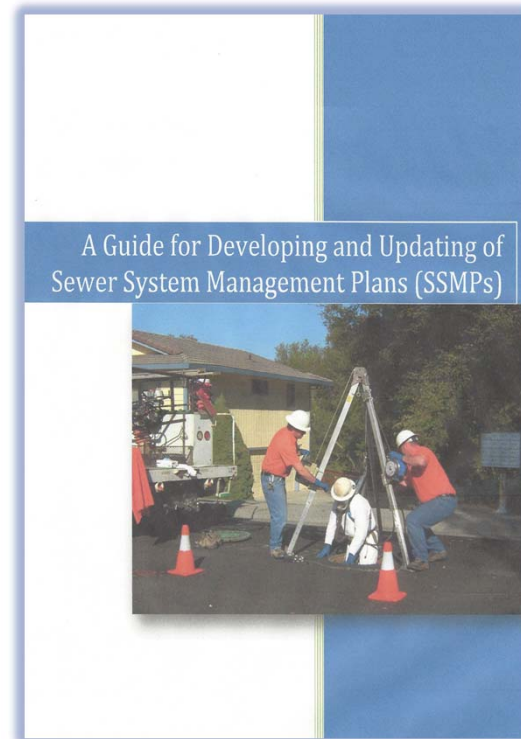


Guide for the Development and Updating of Sewer System Management Plans

Track I: Infrastructure Management

*Sewer Summit 2015
Crowne Plaza
Union City, CA
October 15, 2015*

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Presentation Agenda

- History/Background of SSMP Guidance
- New Guide Overview
 - Current Drivers
 - Development Team
 - Guide Development
 - Purpose and Uses
 - Frequent Questions
 - Endorsements
- SSO Reduction Program Library
- Review of Element suggestions/considerations
- Questions and Comments



2005 SSMP Development Guide

- SFRWQCB required SSMPs in early 2000
- Available July 2005 in Region 2
- Developed by BACWA with the SFRWQCB
- Applied only to Region 2 initially
- Used Statewide after 2006 WDR adoption
- Does not match Element outline in WDR D.13
- No longer appropriate per SWRCB for compliance

2005 Development Guide Outline

1. Goals
2. Organization
3. OERP
4. FOG Control Program
5. Legal Authority
6. Measures and Activities
7. Design and Construction Standards
8. Capacity Management
9. Monitoring, Measurement and Program Modification
10. SSMP Audits





Drivers for a New Guide

- 2005 Guidance - Region 2 SSMP Outline
- 2005 Guidance prior to the WDR
- Included information not required by WDR
- WDR required 11 Elements not 10 (*WDR D13*)
- 2013 MRP Revisions made substantive changes
- 5 Year Agency reviews/recertification
- Field inspection expectations and results past five years
- Past Enforcement Actions especially in California
- Past Legal Settlements across the state



Guide Development Team

- Carolyn Geisler Balazs, Sacramento Sewer
- Marcie Bodeaux, Fairfield Suisun
- Ned Borglin, Lawrence Laboratory
- Dindo Carrillo, Orange County SD
- Paul H. Causey, Causey Consulting
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- Javad Ghaffari, City of Palo Alto
- Douglas C. Humphrey, Humphrey Cons
- Dante Marchetti, Central San
- Juan Martinez, Coachella Valley WVD
- David Meier, Sacramento Sewer
- Terrie Mitchell, Sacramento Sewer
- Andy Morrison, Union Sanitary District
- Mary Phelps, City of Richmond
- Jerry Rodriguez, Coachella Valley WVD
- Eddie Salinas, City of San Diego
- Steve Sauter, Central San
- Paul Seitz, Central San
- Dan Stevenson, Sunnyvale/Emeryville
- Jennifer Swinney, Sacramento Sewer
- Warren Tellefson, CVCWA
- Melissa Thorne, Downey Brand LLP
- Victor Lopez, SWRCB



Guide Development Process

- LROs notified 2005 Guide not acceptable
- Follows WDR D.13 Element Outline and MRP updates
- Confirmed by the SWRCB SSO Office
- Intended as a “Guide” for all agencies
- Suggests information of agency operations
- Anything added is expected by regulators
- Regulators will review SSMP prior to inspection – may not need field inspection
- http://www.waterboards.ca.gov/water_issues/programs/sso/docs/ssmp_guidance_091015.pdf

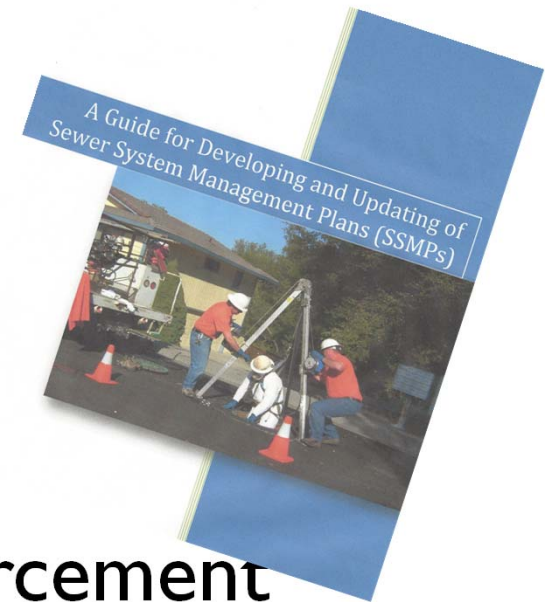


Purpose of the Guidance

- Assist initial SSMP preparation
 - Required inclusions
 - Suggested information
 - Inspection expectations
 - MRP required changes
- Assist with SSMP effectiveness reviews and revisions
- Provide audit considerations and suggestions
- Includes sample forms, graphs and guides
- Not a “One size fits all document or checklist”
- Includes references and answers questions

Guide Section (Element) Outlines

- WDR Requirements
- Things to Think About
- Helpful Hints
- MRP Requirements
- Issues from Inspections/Enforcement
- References
- Attachments/Samples





Frequently Asked Questions

- General questions and answers
 - Effectiveness
 - Update schedules – 2 and 5 year from adoption
 - Governing Board Approvals
 - LRO requirements/certifications
 - Handling of reference materials
 - Audit scheduling and requirements
 - Recertification requirements

Guide Endorsers



California
Water
Environment
Association



B A C W A
B A Y A R E A
C L E A N W A T E R
A G E N C I E S





New SSO Reduction Program Library

- Intended to include:
 - Regulations
 - Reference documents
 - Sample collection system documents/reports
 - Enforcement actions
 - Settlement documents
 - Sample collection system forms
 - SWRCB Presentations
 - Technical Reports
- http://www.waterboards.ca.gov/water_issues/programs/sso/docs/ssm_p_guidance_091015.pdf
- Agencies can submit documents to SSO Office

The screenshot shows a web browser window displaying the State Water Resources Control Board website. The page title is "Sanitary Sewer Overflow Reduction Program". The browser address bar shows the URL: www.waterboards.ca.gov/water_issues/programs/sso/#plan. The page features a navigation menu at the top with options like Home, About Us, Public Notices, Board Info, Board Decisions, Water Issues, Publications/Forms, and Press Room. A sidebar on the left includes information about the Board Chair, Felicia Marcus, and various links such as Cal/EPA, State and Regional Water Boards' Map, Board Priorities, Laws/Regulations, Plans/Policies, Programs, Decisions Pending and Opportunities for Public Participation, and a "CONNECT WITH US" section with Agendas in English and Spanish. The main content area includes a "QUICK LINKS" box with links to SSO Reduction Program Review and Update, General Order Information, SSO Compliance & Enforcement Information Annual Compliance Report, Interactive SSO Report, Sewage Spill Incident Maps, Online SSO Database Access and Use, SSO Data, Sewer System Management Plan Development/Implementation, Sanitary Sewer Systems WDR Training, Historical Information, and SSO Program Contacts. Below this is an "Announcements" section with a link to "FY 13/14 SSO Reduction Program Report" and a "General Order Information" section with a detailed paragraph about the Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems, Water Quality Order No. 2006-0003, and a list of resources including a Glossary of Terms, Statewide General WDRs, Revised Monitoring and Reporting Program, and various forms like NOI Form, Instructions for Completing the NOI Form, LRO Form, and Data Submitter Form.

Browser Address: SWRCB SSO

http://www.waterboards.ca.gov/water_issues/programs/sso/#plan

The screenshot shows a Safari browser window displaying the website for the State Water Resources Control Board. The page title is "Sanitary Sewer Overflow (SSO) Reduction Program". The navigation menu includes Home, About Us, Public Notices, Board Info, Board Decisions, Water Issues, Publications/Forms, and Press Room. The main content area is titled "Available Documents" and contains a paragraph: "This page is intended to provide information to enrollees and the general public. If there are documents that you would like to see posted on this page please contact the SSO Reduction Program Staff." Below this, there are sections for "GENERAL INFORMATION", "OUTREACH", and "ENFORCEMENT ACTIONS". The "OUTREACH" section includes links for "Sewer System Management Plan (SSMP)", "SSMP Two-Year Audit", "Emergency Response Plan", and "USD SSO Response - Field Documentation". The "ENFORCEMENT ACTIONS" section is currently empty. A sidebar on the left contains links to various resources, including Cal/EPA, State and Regional Water Boards' Map, Board Priorities, Laws/Regulations, Plans/Policies, Programs, Decisions Pending and Opportunities for Public Participation, and a "CONNECT WITH US" section with links to Agendas, Water Quality, and Performance Report. The footer of the page indicates the page was last updated on 9/10/15.

http://www.waterboards.ca.gov/water_issues/programs/sso/sso_reduct_lib.shtml



SUGGESTIONS AND COMMENTS ON SSMP ELEMENTS FROM GUIDE



Regulatory Requirements

- Driver original Governing Board adoption for audit/recertification
- Update when “significant financial changes”
- Not just every five years
- Approved SSMP on website or in CIWQS
- All reports LRO certified
- Written audit reports – effectiveness
- Watch for regulatory activity
- Follow new WDR not 2005 Guide Format



General Suggestions

- Legal Disclaimer – not legal assurances
- Review by agency legal counsel
- SSMP a Living Document
- Introduction or Executive Summary
- Use of References – be careful, hyperlink
- Always review and update with SSMP
- Only include what you are or will do
- Review codes/ordinances regularly



Introduction/Executive Summary

- Description of collection system assets
- Detailed pipe information – gravity/pressure
- Lateral responsibilities
- Satellite agencies
- Service area map and statistics
- Information same as CIWQS Questionnaire
- Any unusual asset responsibilities



Element I - Goals

- Agency specific
- Reflect operating philosophy
- Broad based
- Reviewed regularly
- Realistic
- Obtainable
- Effective
- Include senior management input



Element 2 - Organization

- Add organization chart
- Add contractors/sister agencies
- Adequate LROs for 24/7/365 coverage
- No names just classifications in chart
- Add table of Element responsibilities
- Maintain CIWQS listing (30 days)



Element 3 - Legal

- Consider table format rather than narrative
- Provide ALL code references e.g. building
- Lateral definitions and responsibilities clear
- Add agreements with other agencies
- Legally enforceable settlements?
- Satellite agency agreements



Element 4 – O&M Program

- Describe mapping update process/systems
- Overview of O&M program
- Describe all maintenance frequencies
- Small and large diameter line cleaning, laterals
- CCTV, roots, vectors, etc.
- Pump station procedures
- Condition assessment procedures
- Include both short and long term R&R
- Have procedures to support
- Describe real training – SSMP, OERP specific



Element 5 - Design

- Are standards formally adopted
- Are they current
- Regularly reviewed
- If references, how are they updated
- Are they reviewed with each audit
- Technology advances handled

Element 6 - OERP

- SSMP Followed in the field
- Adopted procedures to support SSMP
- All communications recorded
- Regular training conducted and documented
- New WQMP and Technical Reports >50K gallons
- Recordkeeping audited
- Records conform with new MRP
- Are events debriefed and root cause evaluated
- Is CWIQS data correct and certified timely
- Are field exercises conducted – volume estimation



Element 7 - Fog

- Do you need a program – some don't
- FSE mapping
- Regular documented FSE inspections
- Proper training for inspectors
- Coordination with Building Departments
- Hot spot mapping utilized
- How are FSEs determined
- Any agency procedures
- Legal authority for enforcement available



Element 8 – Capacity Assurance

- How is capacity evaluated – model, other
- How are improvements prioritized
- Evaluated during wet weather conditions
- Agency design criteria established
- Evaluation of both short and long term needs
- Coordinated with Element 5
- Improvements scheduled



Element 9 – Program Modification

- Realistic performance measures used
- How do measures relate to effectiveness
- Trends noted/evaluated
- Are historical results evaluated
- Use tables and graphs for easy understanding
- Are there measures for each SSMP Elements
- Are measures fiscal or calendar year based
- Results reported to Governing Board regularly

Element 10 - Audit

- Based upon original adoption date
- Who does the audit
- Must evaluate effectiveness of program
- Written document prepared
- Explain anomalies found
- Review and conform all references
- Review all hyperlinks
- Review codes and ordinances
- LRO certifies final audit report
- Filed in SSMP appendix



Element II - Communications

- How do you promote your “great” work
- Annual reports to governing board in open session
- Newsletters, brochures, public events
- Counter handouts and information
- Satellite/tributary agency contacts
- Media spokesperson identified
- Regular media promotion of work



Conclusions

- New Guide follows WDR D13 outline
- Developed by actual collection system practitioners
- Strongly endorsed by professional organizations
- Provides suggestions for agency consideration
- Offers evaluations of legal issues up to publication
- Provides examples of forms, etc.
- Lists current references on collection systems ops
- Readily available at SWRCB Library
- New Library to provide additional references
- New library will be as current as agencies make it



Thanks for Listening

QUESTIONS AND COMMENTS?

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