

Triennial Sewer System Management Plan Audit Report

Date: October 10, 2024

The purpose of the Sewer System Management Plan (SSMP) Audit is to evaluate the implementation and effectiveness of **Mt. View Sanitary District's** SSMP in preventing spills, to evaluate its compliance with State Water Resources Control Board Order No. WQ 2022-0103-DWQ, to identify SSMP deficiencies in addressing ongoing spills and discharges to waters of the State, and to identify necessary modifications to the SSMP to correct deficiencies.

This audit report is designed to meet the requirements of State Water Resources Control Board Order No. WQ 2022-0103-DWQ; namely, to document audit findings and recommended corrective actions, and to provide a schedule to address identified deficiencies. Sewer system operators' input on the audit findings has been considered throughout the preparation of the SSMP. Documentation of SSMP audits are kept on file at Mt. View Sanitary District, and audit reports are also uploaded to the California Integrated Water Quality System (CIWQS) database.

Directions: *Please update the following items in the SSMP:*

ELEMENT 1. SSMP GOALS AND INTRODUCTION

- Update the date of the last SSMP update / Board re-certification.
- Update the year of the last SSMP audit.
- Update the District population served, and number of residential and commercial connections.

ELEMENT 2. ORGANIZATION

- Update the key positions and roles as needed.
- Update the organization chart.

ELEMENT 3. LEGAL AUTHORITY

- None.

ELEMENT 4. OPERATIONS AND MAINTENANCE PROGRAM

4.A Updated Map of Sanitary Sewer System: None.

4.B Preventive Operation and Maintenance Activities: Update the number of trouble spots in the first paragraph.

4.C Training: Review and update for changes in training.

4.D Equipment Inventory: Review and update the equipment and instrumentation inventories as necessary.

ELEMENT 5. DESIGN AND PERFORMANCE PROVISIONS

- If necessary, update the most recent year of issuance by Central San of their Standard Specifications.
- If necessary, update the link to the Central San Standard Specifications.

ELEMENT 6. SPILL EMERGENCY RESPONSE PLAN

- Update Figure 2 for position and employee changes, as well as spill feedback.

ELEMENT 7. SEWER PIPE BLOCKAGE CONTROL PROGRAM

- None.

ELEMENT 8. SYSTEM EVALUATION, CAPACITY ASSURANCE, AND CAPITAL IMPROVEMENTS

- Under A, update the first paragraph to reflect the total duration in years and total cost for the collection system condition assessment program.
- Under A, update the fourth paragraph to reflect the latest status update and schedule regarding the three phases of the collection system condition assessment program.
- Under B, update to include any new information regarding capacity assessments, development-driven capacity situations, I&I investigations, etc.
- Under D, update the second paragraph to reflect the current status of the 10-year CIP update.
- If applicable, update Appendix D to replace an older 10-year CIP update with the current one.

ELEMENT 9. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

- Update the date range on the first page.
- Update all the tables, figures, and map.
- Update the narrative paragraph after each table, figure, and map.
- Update the “Digital Inspections” paragraph.
- Update the “Summary of Performance Indicators” paragraph.

ELEMENT 10. INTERNAL AUDITS

- When applicable, replace the audit report in Appendix C with a copy of the most recent audit report. Update the date in the SSMP table of contents and the Appendix D fly sheet.

ELEMENT 11. COMMUNICATION PROGRAM

- Update any changes to the District’s Communication Plan that includes the District’s newsletter, billboard, website, social media platforms, public education program, public events, collaborative groups, the Mt. Diablo Wetlands Fund, the District’s Community Advisory Group, door hangers, bill inserts, and mailers.

Directions: Please indicate **YES** or **NO** for each question. To answer the following questions, refer to the text of the SSMP Element, any referenced material in the text, all corresponding attachments, and any data collected to assist in assessing SSMP effectiveness. For any **NO** responses describe the updates or changes needed and the timeline to completion in “Description of Scheduled Updates/Changes to the SSMP” on the last page of this form.

ELEMENT 1. SSMP GOALS AND INTRODUCTION

1. Are the goals stated in the SSMP still appropriate and accurate? **YES**

ELEMENT 2. ORGANIZATION

2. Is the SSMP up-to-date with organization and staffing contact information? **NO**

ELEMENT 3. LEGAL AUTHORITY

3. Does the SSMP reference up-to-date information about legal authority? **YES**
4. Does sufficient legal authority exist to control sewer use and maintenance? **YES**

ELEMENT 4. OPERATIONS AND MAINTENANCE PROGRAM

4.A Updated Map of Sanitary Sewer System

5. Does the SSMP reference up-to-date information about maps? **YES**
6. Are collection system maps complete, up-to-date, and sufficiently detailed? **YES**

4.B Preventive Operation and Maintenance Activities

7. Does the SSMP contain up-to-date information about preventive operations and maintenance activities? **YES**
8. Are preventive maintenance activities sufficient and effective in reducing and preventing spills and blockages? **YES**

4.C Training

9. Does the SSMP contain up-to-date information about existing training programs? **YES**
10. Do supervisors believe their staff are sufficiently trained? **YES**
11. Are staff satisfied with the training opportunities and support offered to them? **YES**

4.D Equipment Inventory

12. Does the SSMP reference up-to-date information about equipment and replacement part inventories? **YES**

ELEMENT 5. DESIGN AND PERFORMANCE PROVISIONS

13. Does the SSMP contain up-to-date information about design and construction standards? **YES**

ELEMENT 6. SPILL EMERGENCY RESPONSE PLAN

- | | |
|---|------------|
| 14. Does the SSMP contain an up-to-date version of Spill Emergency Response Plan (SERP)? | NO |
| 15. Is the SERP effective in handling spills? (if YES , indicate specific information under the “Evaluation of the Effectiveness of the SSMP” section below) | YES |

ELEMENT 7. SEWER PIPE BLOCKAGE CONTROL PROGRAM

- | | |
|--|------------|
| 16. Does the SSMP reference or contain up-to-date information about the FOG control program? | YES |
| 17. Is the current FOG program effective in documenting and controlling FOG sources? | YES |
| 18. Are all public outreach materials for the FOG program current? | YES |

ELEMENT 8. SYSTEM EVALUATION, CAPACITY ASSURANCE, AND CAPITAL IMPROVEMENTS

- | | |
|--|------------|
| 19. Does the SSMP contain up-to-date information about Closed Circuit Television (CCTV) inspections? | YES |
| 20. Are scheduled inspections and the condition assessment system effective in identifying, prioritizing, and addressing deficiencies? | YES |
| 21. Does the SSMP reference or contain up-to-date information about capacity assessment activities and documentation? | YES |
| 22. Are hydraulic deficiencies being sufficiently addressed? | YES |
| 23. Does the SSMP contain up-to-date information about the rehabilitation and replacement program? | YES |
| 24. Does the Capital Improvement Plan (CIP) address prioritized projects for collection system assets? | YES |

ELEMENT 9. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

- | | |
|---|------------|
| 25. Does the SSMP reference up-to-date information about data collection and organization (e.g. use of CMMS, performance indicators, etc.)? | YES |
| 26. Is the data collection and organization sufficient to evaluate the effectiveness of the SSMP? | YES |

ELEMENT 10. INTERNAL AUDITS

- | | |
|--|------------|
| 27. Is an internal SSMP Audit completed every three years? | YES |
|--|------------|

ELEMENT 11. COMMUNICATION PROGRAM

- | | |
|---|------------|
| 28. Is the website up-to-date, including information related to the SSMP? | YES |
|---|------------|

EVALUATION OF THE EFFECTIVENESS OF THE SSMP

ELEMENT 1. SSMP GOALS AND INTRODUCTION

- The SSMP continues to be effective to meet or exceed its three goals.

ELEMENT 2. ORGANIZATION

- The District's organization, staff positions, and roles continue to effectively administer and implement all SSMP elements.

ELEMENT 3. LEGAL AUTHORITY

- The District Code continues to be effective in providing the legal authority to enact and enforce the SSMP.

ELEMENT 4. OPERATIONS AND MAINTENANCE PROGRAM

4.A Updated Map of Sanitary Sewer System: The Geographic Information System (GIS) continues to be a very effective tool for collection system asset mapping.

4.B Preventive Operation and Maintenance Activities: The prioritized preventive maintenance list continues to be an effective tool for collection system maintenance. This list is reviewed often and adjusted as needed. Sanitary sewer spills in the District's collection system are down over a 5-year span.

4.C Training: All collection system staff continue to receive training in the field.

4.D Equipment Inventory: The contingency equipment on hand has proven to be adequate, and serves the District well during spill events. As items in the current inventory break, they are replaced or repaired.

ELEMENT 5. DESIGN AND PERFORMANCE PROVISIONS

- The Central San Standard Specifications continue to be excellent standards to govern the design, construction, testing, and inspection of all public and private collection system facilities.
- The District Code continues to adequately govern the proper design, permitting, construction, testing, and inspection of all wastewater facilities.

ELEMENT 6. SPILL EMERGENCY RESPONSE PLAN

- The SERP continues to be an effective field tool during spill events. Telephone numbers continue to be updated as needed and forms are replaced as used.

ELEMENT 7. SEWER PIPE BLOCKAGE CONTROL PROGRAM

- The FOG program remains unchanged yet effective. Our neighboring sanitary sewer agency's source control inspection staff continues to perform source control inspections under contract on the District's behalf, and provides the District with inspection reports

and notice of violations immediately. Violations are also followed up by the neighboring sanitary sewer agency's staff and monitored by District staff.

ELEMENT 8. SYSTEM EVALUATION, CAPACITY ASSURANCE, AND CAPITAL IMPROVEMENTS

- Through Phases 1 and 2, the collection system condition assessment program has been effective in identifying pipeline condition defects, and the computerized risk model has been effective in prioritizing those defects for future CIP project scopes.
- The 2023 pump stations condition assessment was effective in identifying condition issues at the pump stations and prioritizing those issues into recommended, future CIP improvements.
- The 2022 capacity assessment and updated hydraulic model continue to be effective tools to assess and manage collection system capacity.
- The 10-year CIP update continues to be an effective planning and communication tool that incorporates recommendations for improvements arising from the completed condition and capacity assessments. The effectiveness of the SSMP in this area will be further evaluated once a new 10-year CIP update has been adopted sometime in 2025.

ELEMENT 9. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

- The graphs, charts, and narratives that accompany the images have all been updated. The data demonstrates that the District continues to meet its numeric targets by effectively implementing its SSMP, and that the District's Element 1 goals continue to be met or exceeded. Proactive planning, management, and maintenance of the collection system have achieved excellent results. When further analyzing the data, if the spills caused by the negligence of others outside the District were omitted, there is a noticeable decrease in spills. The total number of spills has decreased overall, also demonstrating the effectiveness of the District's SSMP.

ELEMENT 10. INTERNAL AUDITS

- An internal SSMP audit is performed at least every three years, and continues to be an effective method to evaluate the overall implementation and effectiveness of the SSMP and its compliance with State Water Resources Control Board Order No. WQ 2022-0103-DWQ, as well as to identify SSMP deficiencies and the necessary steps and timeframe to correct them.

ELEMENT 11. COMMUNICATION PROGRAM

- The District's communication program continues to be effective with engaging and informative messaging through various media.

DESCRIPTION OF SCHEDULED UPDATES / CHANGES TO THE SSMP

Unless noted otherwise, all changes are being made immediately in the SSMP.

ELEMENT 1. SSMP GOALS AND INTRODUCTION

- The goals and introduction sections were combined and expanded to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.

ELEMENT 2. ORGANIZATION

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.
- Add the Deputy General Manager / Environmental Services Manager position.
- Remove the Associate Engineer position.
- Update the organization chart.

ELEMENT 3. LEGAL AUTHORITY

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.

ELEMENT 4. OPERATIONS AND MAINTENANCE PROGRAM

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.

4.A Updated Map of Sanitary Sewer System: The GIS is kept up to date. Paper maps are generally not used by staff anymore as the District now primarily uses digital technologies to view GIS, MMS, and maps.

4.B Preventive Operation and Maintenance Activities: N/A

4.C Training: Staff are well trained, but it might be beneficial to schedule quarterly Spill Emergency Response Plan (SERP) refresher trainings.

4.D Equipment Inventory: N/A

ELEMENT 5. DESIGN AND PERFORMANCE PROVISIONS

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.
- A paragraph about the 18 District bulletins was removed. These bulletins were utilized somewhat in the past, and although they are still available, they are presently no longer used for day-to-day District operations.
- On November 17, 2021, the Board of Directors rescinded the District's Stormwater / Groundwater Disconnect Policy, which previously allowed for the issuance of temporary discharges of storm or ground water to the sanitary sewer system pursuant to the conditions of a permit. The policy was rescinded, as upon careful review and examination it was found to contradict and undermine the clear and unequivocal provisions of the District

Code, and was furthermore extraneous, unjustified, and unnecessary. Reference to the rescinded policy has been deleted from this Section. Former Appendix B, a copy of the policy, was also deleted.

ELEMENT 6. SPILL EMERGENCY RESPONSE PLAN

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.
- The District updated its SERP in 2023 to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ. The updated SERP is now attached to the SSMP as Appendix B.
- Update Figure 2 to match the information provided in Element 2.

ELEMENT 7. SEWER PIPE BLOCKAGE CONTROL PROGRAM

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.

ELEMENT 8. SYSTEM EVALUATION, CAPACITY ASSURANCE, AND CAPITAL IMPROVEMENTS

- The section was rewritten to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.
- The condition assessment program computerized risk model for the first program cycle through the District's entire collection system is anticipated to be complete by the end of 2025.
- The 10-year CIP update and planning process will ultimately culminate in a new CIP that will be presented to the Board of Directors for review, direction, approval, and adoption sometime in 2025.

ELEMENT 9. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.

ELEMENT 10. INTERNAL AUDITS

- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.

ELEMENT 11. COMMUNICATION PROGRAM

- The District's Communication Plan has been included and will be updated annually.
- The section was updated to comply with State Water Resources Control Board (SWRCB) Order WQ 2022-0103-DWQ.