

**Appendix N.**  
**Standard Operating Procedure for SSMP Audit Procedures**

Reviewed by: _____
Approved by: _____
Date: _____

Environmental & Regulatory Compliance  
Standard Operating Procedure

SUBJECT: **AUDIT AND CONTINUOUS IMPROVEMENT OF SANITARY SEWER MANAGEMENT PLAN**

**1. Purpose**

- 1.1 To provide clear and complete instructions for auditing EMWD Sanitary Sewer Audit Plan (SSMP).

**2. Authority**

- 2.1 General Manager
- 2.2 Director of Environmental and Regulatory Compliance (ERC)

**3. Policy**

- 3.1 It is the policy of the District to comply with all environmental and regulatory agency requirements including conducting internal audits of SSMP every two years, and comprehensive review and recertification of SSMP every five years.
- 3.2 It is the policy of the District to ensure that reasonable and effective corrective actions are implemented to prevent or minimize the potential for future occurrences of spills which result from sanitary sewer overflows.

**4. Governing Directive**

- 4.1 State of California Regional WaterQuality Control Boards Order No. 2006-0003-DWQ.

**5. Definitions**

- 5.1 **Sanitary Sewer Overflow (SSO):** Any overflow, spill, release discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system. SSOs include:
  - (i) Overflows or releases of untreated or partially treated wastewater that reach waters of the United States;
  - (ii) Overflows or releases of untreated or partially treated wastewater that do not reach waters of the United Sates; and
  - (iii) Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.
- 5.2 **Sanitary Sewer Management Plan (SSMP):** State mandated plan to provide proper

and efficient management, operation, and maintenance of sanitary sewer systems. The overall goal is to minimize water quality impact and potential nuisance conditions of SSO.

**6. Audit Procedures** – Attachment A contains audit report template to be utilized

- 6.1 Every two years, review and update SSMP elements, including but not limited to, Organizational and Contact Information, Legal Authority, FOG Control Program, Capital Improvement Budget, Standard Operating Procedures or Overflow Emergency Response Plan.
- 6.2 Review SSMP implementation efforts over the past two years. Identify any trends in SSO data monitored as described in Section 9 of SSMP.
- 6.3 Prepare draft report documenting audit and review.
  - 6.3.1 Clearly identify any deficiencies, if any.
- 6.4 Meet with responsible divisions and review draft report.
  - 6.4.1 Develop strategies to correct any deficiencies with plan.
- 6.5 Finalize draft report with strategies for responsible divisions to correct any identified deficiencies or trends.
- 6.6 If there are significant changes that need to be made to SSMP, then SSMP is required to go before Board of Directors at a public meeting to be re-certified. If changes are only minor (i.e. update of organizational/contact information, budget information, etc.) then SSMP does not need to be re-certified by the Board of Directors.
- 6.7 File and store audit report on network drive: \\Hawaii\j\ENVIRONMENTAL\Waste Water Program\SSMP\Audits.

**7. Comprehensive Review Procedures**

- 7.1 Every five years, all past audit reports should be reviewed and any significant changes to SSMP elements and program, as identified as recommendation in the audits or otherwise made, should be incorporated into the SSMP.
- 7.2 Whether the SSMP is revised or not, it is required to be re-certified by the Board of Directors at a public meeting every five years.

SUBJECT:

**SANITARY SEWER OVERFLOWS**

**ATTACHMENT A**

## Introduction

Eastern Municipal Water District (EMWD) is an enrollee under the Statewide General Waste Discharge Requirement for Sanitary Sewer Systems (WDR SSS), Order No. 2006-0003-DWQ that was adopted by the State Water Resources Control Board (SWRCB) on May 2, 2006. The purpose of the WDR SSS is to provide a consistent, statewide regulatory approach to address sanitary sewer overflows (SSOs) and to prevent, where possible, and be prepared to respond to, SSOs. The WDR SSS requires EMWD to report all SSOs to the SWRCB's online database called the California Integrated Water Quality System (CIWQS), and to develop and implement a Sewer System Management Plan (SSMP). The purpose of the SSMP is to document EMWD's program to properly operate and maintain its sanitary sewer system. Due to EMWD's service area being split between the authority of the Santa Ana Regional Water Quality Control Board, or Region 8, and the San Diego Regional Water Quality Control Board, or Region 9, the District has two separate enrollments under the WDR SSS, EMWD CS and Temecula Valley RCS, respectively. However, because the sewer systems are interconnected and managed as one asset, the District only has one SSMP that covers its entire service area.

Per Section D.13(x) of the WDR SSS, EMWD must, *"...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....including identification of any deficiencies in the SSMP and steps to correct them."* Additionally, per Section D.14 of the WDR SSS, EMWD is required to undergo a comprehensive review every two years and update its SSMP and have it re-certified by its Board of Directors every five years. The SSMP must also be re-certified by its Board of Directors anytime significant changes are made. Table 1.1 depicts EMWD's SSMP Audit/Certification activity.

Table 1.1

<b>WDR SSS Adopted by SWRCT</b>	<b>May 2006</b>
<b>EMWD Board of Directors Certified SSMP</b>	<b>April 2009</b>
<b>WDR SSS Deadline for Certifying SSMP</b>	<b>May 2009</b>
<b>Biennial Audit Completed</b>	<b>May 2011</b>
<b>EMWD adopted changes to SSMP and Certified SSMP</b>	<b>December 2011</b>
<b>Biennial Audit Completed</b>	<b>October 2013</b>
<b>Biennial Audit Completed</b>	<b>October 2015</b>
<b>Comprehensive Review – SSMP Recertification</b>	<b>December 2016</b>
<b>Began Audit (Pending State Frequency Changes)</b>	<b>October 2018</b>
<b>EMWD adopted changes to SSMP and Certified SSMP</b>	<b>September 2019</b>

Eastern Municipal Water District  
Sewer System Management Plant (SSMP)  
(Audit Template)



[Date]

## Audit of Section I. Goals

*Review the stated goals of the SSMP. Are the goals stated in the SSMP appropriate and accurate? Do they demonstrate that EMWD is properly managing, operating and maintaining its collection system to reduce and prevent SSOs, as well as mitigate any SSOs that do occur?*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## Audit of Section II. Organization

*Does the SSMP identify current responsible or authorized representatives, including names and contact information for EMWD staff responsible for implementing specific measures in the SSMP program? Is the organizational chart updated and lines of authority accurately explained? Is the chain of communication for reporting SSOs up-to-date?*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## Audit of Section III. Legal Authority

*Does the SSMP demonstrate EMWD's legal authority to prevent illicit discharges, ensure proper sewer construction, access for maintenance & inspection of sewer facilities, limit FOG or debris that cause blockages and enforce violations via ordinances and interagency agreements?*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## Audit of Section IV. Operation and Maintenance

*Does the SSMP demonstrate that EMWD has the procedures, tools and resources to properly operate and maintain its collection system by (a) maintaining up-to-date maps of the sanitary sewer system, showing applicable sewer attributes, (b) has an effective routine preventative maintenance program in place, including a description of its computerized maintenance management system (CMMS) to generate and track work orders, (c) describes its rehabilitation and replacement program, (d) has trained operations and maintenance staff and (e) has appropriate emergency equipment and replacement part inventories for its sewer facilities.*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## Audit of Section V. Design and Performance Provisions

*Does the SSMP demonstrate that EMWD has design and construction standards and specifications for installation of sewer system facilities as well as procedures and standards for inspection and testing of newly installed and/or rehabilitated and repaired sewer system facilities?*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## Audit of Section VI. Overflow Emergency Response Plan

*Does the SSMP demonstrate that EMWD has developed and implemented an overflow response emergency plan that identifies (a) notification procedures, (b) appropriate response to all overflows including emergency operations measures that may need to be taken, and mitigation efforts (c) procedures for notification to regulatory agencies, including online reporting to CIWQS, and (d) staff trained on all procedures for overflow response? Procedures up-to-date?*



**Compliance Status**

**Findings**

**References**

**Recommendations**

**Audit of Section VII. Fats, Oils and Grease (FOG) Control Program**

*Does the SSMP include a FOG Control Implementation Plan that includes public education outreach efforts, and list acceptable disposal facilities or grease haulers? Does this section describe EMWD’s legal authority to prohibit discharges of FOG to its sewer system, interceptor installation, maintenance and inspection requirements, and any other source control measures developed to control FOG? Does the SSMP clearly identify the responsible Division’s within EMWD who are responsible for implementing the FOG control program, including identification of areas that are subject to FOG blockages and procedures for establishment of areas that require more frequent cleaning?*

**Compliance Status**

**Findings**

**References**

**Recommendations**

**Audit of Section VIII. System Evaluation & Capacity Assurance Plan**

*Does the SSMP demonstrate that EMWD has developed and implements a capital improvement plan (CIP) that provides hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event? Does the SSMP contain the updated wastewater and collection system CIP budget?*

**Compliance Status**

**Findings**

**References**

**Recommendations**

## **Audit of Section IX. Monitoring, Measurement, and Program Modifications**

*Does the SSMP demonstrate how EMWD can identify and illustrate SSO trends? Does the SSMP address how EMWD assess' the success of its Preventative Maintenance Program and effectiveness of the SSMP? Are any performance metrics identified?*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## **Audit of Section X. SSMP Audits**

*Is EMWD conducting internal audits of its SSMP in accordance with the requirements in the WDR SSS? Has EMWD established, and is following, a process and procedure for internal audits of its SSMP?*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## **Audit of Section XI. Communication Program**

*How is EMWD staff communicating elements of its SSMP program with the public? Is there a plan of communication with its satellite agencies?*

### **Compliance Status**

### **Findings**

### **References**

### **Recommendations**

## Summary of Audit

*[Summarize overall results of audit/comprehensive review. Note if action by the Board of Directors is needed.]*