

**EL TORO WATER DISTRICT**

**SEWER SYSTEM MANAGEMENT PLAN**

**STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS  
FOR  
SANITARY SEWER SYSTEMS**

**STATE WATER RESOURCES CONTROL BOARD  
ORDER NO. 2006-0003-DWQ**



**JANUARY 2017**

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- Appendix A State Water Resources Control Board Order No. 2006-0003-DWQ  
Statewide General Waste Discharge Requirements for Wastewater Collection  
Agencies
- Appendix B Order No. 2006-0003 - Fact Sheet
- Appendix C State of California Water Resources Control Board Order No. WQ2013-0058  
EXEC. - Monitoring & Reporting Program For Statewide General Waste Discharge  
Requirements for Sanitary Sewer Systems

**ABBREVIATIONS / ACRONYMS**

AB	Assembly Bill
BMP	Best Management Practice
CCTV	Closed-Circuit Television
CFR	Code of Federal Regulations
CFRRP	Capital Facilities Replacement and Refurbishment Plan
CIWQS	California Integrated Water Quality System
CWEA	California Water Environment Association
ERP	Emergency Response Plan
ETWD	El Toro Water District
FOG	Fats, Oils, and Grease
I/I	Infiltration and Intrusion
MRP	Monitoring and Reporting Program
O&M	Operation and Maintenance
OCHCA	Orange County Health Care Agency
OES	Office of Emergency Services
Order	SWRCB Order No. 2006-0003-DWQ
Order (MRP)	California Integrated Water Quality System W.Q. 2013-0058-EXEC
PM	Preventative Maintenance
RWQCB	Regional Water Quality Control Board
SCADA	Supervisory Control and Data Acquisition
SOP	Standard Operating Procedure <u>or</u> Standard Maintenance Procedure
SSO	Sanitary Sewer Overflow and any sewer spill or overflow of sewage
SSMP	Sewer System Management Plan
SSRP	Sewer Spill Response Plan
SSOPP	Sanitary Sewer Overflow Prevention Plan
SWRCB	State Water Resources Control Board
WDR	Waste Discharge Requirements
WRP	Wastewater Recycling Plant

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## EXECUTIVE SUMMARY

This Sewer System Management Plan (SSMP) addresses the prevention and cleanup of sanitary sewer overflows (SSOs). All sewage collection agencies are required to comply with the “, State Water Resources Control Board (SWRCB) Order No. 2006-0003-DWQ (Order) on Statewide General Waste Discharge Requirements for Wastewater Collection Agencies. The purpose of the Order is to prevent SSOs, and to provide a plan and schedule for measures to be implemented to prevent SSOs, as well as measures to effectively clean up and report any spills.

The Order requires that each agency properly fund, manage, operate, and maintain the sewage collection system for which it is responsible. The El Toro Water District (ETWD) is required as an “Enrollee” by the Order to use trained staff (and/or contractors) possessing adequate knowledge, skills, and abilities to complete necessary collection system work and maintenance.

The essence of this Order is:

- ETWD must proactively manage the sanitary sewer system it operates in a way that prevents SSOs.
- To facilitate proper funding and management of sanitary sewer systems, each Enrollee must develop and implement a system-specific Sewer System Management Plan (SSMP) in compliance with the Order.
- The Enrollee must comply with all conditions of the Order. Any noncompliance with the Order constitutes a violation of the California Water Code and is grounds for SWRCB enforcement action.

This SSMP report is organized to correspond to the sections of the Order. The report consists of 12 chapters. In general, each chapter begins with a summary of Order requirements, followed, where appropriate, by these subsections:

- Compliance Summary – A description of how compliance was achieved
- Compliance Documents – A listing of source documents that support compliance
- Roles and Responsibilities – A listing of relevant staff roles and responsibilities

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## CHAPTER 1 – PROHIBITIONS AND PROVISIONS

This chapter describes the sewage discharge prohibitions and fifteen provisions prescribed in the Order.

### 1.1 Prohibitions

The Order provides that:

- Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.
- Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is grounds for enforcement action.

### 1.2 Provisions

The Enrollee must meet the following fifteen provisions:

1. The Enrollee must comply with all conditions in the Order. Any noncompliance with the Order constitutes a violation of the California Water Code and is grounds for enforcement action.
2. It is the intent of the State Water Board that sanitary sewer systems be regulated in a manner consistent with the general WDRs. Nothing in the general WDRs shall be:
  - (i) Interpreted or applied in a manner inconsistent with the Federal Clean Water Act, or supersede a more specific or more stringent state or federal requirement in an existing permit, regulation, or administrative/judicial order or Consent Decree;
  - (ii) Interpreted or applied to authorize an SSO that is illegal under either the Clean Water Act, an applicable Basin Plan prohibition or water quality standard, or the California Water Code;
  - (iii) Interpreted or applied to prohibit a Regional Water Board from issuing an individual NPDES permit or WDR, superseding this general WDR, for a sanitary sewer system, authorized under the Clean Water Act or California Water Code; or
  - (iv) Interpreted or applied to supersede any more specific or more stringent WDRs or enforcement order issued by a Regional Water Board.
3. The Enrollee shall take all feasible steps to eliminate SSOs. In the event that an SSO does occur, the Enrollee shall take all feasible steps to contain and mitigate the impacts of an SSO.

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4. In the event of an SSO, the Enrollee shall take all feasible steps to prevent untreated or partially treated wastewater from discharging from storm drains into flood control channels or waters of the United States by blocking the storm drainage system and by removing the wastewater from the storm drains.
  5. All SSOs must be reported via the California Integrated Water Quality System (CIWQS) in accordance with the SWRCB Order No. 2013-0058 EXEC.
  6. In any enforcement action, the State and/or Regional Water Boards will consider the appropriate factors under the duly adopted State Water Board Enforcement Policy. And, consistent with the Enforcement Policy, the State and/or Regional Water Boards must consider the Enrollee's efforts to contain, control and mitigate SSOs when considering the California Water Code Section 13327 factors. In assessing these factors, the State and/or Regional Water Boards will also consider whether:
    - (i) The Enrollee has complied with the requirements of this Order, including requirements for reporting and developing and implementing a SSMP;
    - (ii) The Enrollee can identify the cause or likely cause of the discharge event;
    - (iii) There were no feasible alternatives to the discharge, such as temporary storage or retention of untreated wastewater, reduction of inflow and infiltration, use of adequate backup equipment, collecting and hauling of untreated wastewater to a treatment facility, or an increase in the capacity of the system as necessary to contain the design storm event identified in the SSMP. It is inappropriate to consider the lack of feasible alternatives, if the Enrollee does not implement a periodic or continuing process to identify and correct problems;
    - (iv) The discharge was exceptional, unintentional, temporary, and caused by factors beyond the reasonable control of the Enrollee;
    - (v) The discharge could have been prevented by the exercise of reasonable control described in a certified SSMP for:
      - Proper management, operation and maintenance;
      - Adequate treatment facilities, sanitary sewer facilities, and/or components with an appropriate design capacity, to reasonably prevent SSOs (e.g., adequately enlarging treatment or collection facilities to accommodate growth, infiltration and inflow (I/I), etc);
      - Preventive maintenance (including cleaning and fats, oils, and grease (FOG) control);
      - Installation of adequate backup equipment; and
      - Inflow and infiltration prevention and control to the extent practicable.



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- (vi) The sanitary sewer system design capacity is appropriate to reasonably prevent SSOs.
  - (vii) The Enrollee took all reasonable steps to stop and mitigate the impact of the discharge as soon as possible.
7. When a sanitary sewer overflow occurs, the Enrollee shall take all feasible steps and necessary remedial actions to 1) control or limit the volume of untreated or partially treated wastewater discharged, 2) terminate the discharge, and 3) recover as much of the wastewater discharged as possible for proper disposal, including any wash down water.
- The Enrollee shall implement all remedial actions to the extent they may be applicable to the discharge and not inconsistent with an emergency response plan, including the following:
- (i) Interception and rerouting of untreated or partially treated wastewater flows around the wastewater line failure;
  - (ii) Vacuum truck recovery of sanitary sewer overflows and wash down water;
  - (iii) Cleanup of debris at the overflow site;
  - (iv) System modifications to prevent another SSO at the same location;
  - (v) Adequate sampling to determine the nature and impact of the release; and
  - (vi) Adequate public notification to protect the public from exposure to the SSO.
8. The Enrollee shall properly, manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.
9. The Enrollee shall allocate adequate resources for the operation, maintenance, and repair of its sanitary sewer system, by establishing a proper rate structure, accounting mechanisms, and auditing procedures to ensure an adequate measure of revenues and expenditures. These procedures must be in compliance with applicable laws and regulations and comply with generally acceptable accounting practices.
10. The Enrollee shall provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events. Capacity shall meet or exceed the design criteria as defined in the Enrollee's System Evaluation and Capacity Assurance Plan for all parts of the sanitary sewer system owned or operated by the Enrollee
11. The Enrollee shall develop and implement a written Sewer System Management Plan (SSMP) and make it available to the State and/or Regional Water Board upon request. A copy of this document must be publicly available at the Enrollee's office and/or available on the Internet. This SSMP must be approved by the Enrollee's governing board at a public meeting.

12. In accordance with the California Business and Professions Code sections 6735, 7835, and 7835.1, all engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. Specific elements of the SSMP that require professional evaluation and judgments shall be prepared by or under the direction of appropriately qualified professional, and shall bear the professional(s) signature and stamp.
13. The mandatory elements of the SSMP are specified below. However, if the Enrollee believes that any element of this section is not appropriate or applicable to the Enrollee's sanitary sewer system, the SSMP program does not need to address that element. The Enrollee must justify why that element is not applicable. The SSMP must be approved by the deadlines listed in the SSMP Time Schedule below.

### **Sewer System Management Plan (SSMP)**

- (i) Goals
  - (ii) Organization
  - (iii) Legal Authority
  - (iv) Operation and Maintenance Program
  - (v) Design and Performance Provisions
  - (vi) Overflow Emergency Response Plan
  - (vii) FOG Control Program
  - (viii) System Evaluation and Capacity Assurance Plan
  - (ix) Monitoring, Measurement, and Program Modifications
  - (x) SSMP Program Audits
  - (xi) Communications Program
14. Both the SSMP and the Enrollee's program to implement the SSMP must be certified by the Enrollee to be in compliance with the requirements set forth above and must be presented to the Enrollee's governing board for approval at a public meeting. The Enrollee shall certify that the SSMP, and subparts thereof, are in compliance with the general WDRs within the time frames identified in the time schedule provided in subsection D.15.

In order to complete this certification, the Enrollee's authorized representative must complete the certification portion in the Online SSO Database (CIWQS) Questionnaire by checking the appropriate milestone box, printing and signing the automated form, and sending the form to:

State Water Resources Control Board  
Division of Water Quality  
Attn: SSO Program Manager  
P.O. Box 100  
Sacramento, CA 95812

The SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification by the governing board of the Enrollee is required in accordance with D.14 when significant updates to the SSMP are made. To complete the re-certification process, the Enrollee shall enter the data in the Online (CIWQS) SSO Database and mail the form to the State Water Board, as described above.

15. The Enrollee shall comply with these requirements according to the following schedule. This time schedule does not supersede existing requirements or time schedules associated with other permits or regulatory requirements.

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## CHAPTER 2 – GOALS

This chapter describes the goals of the SSMP. The El Toro Water District is required to comply with the “State Water Resources Control Board, Order No. 2006-0003-DWQ” (Order) on General Waste Discharge Requirements for Sewage Collection Agencies. .

### 2.1 Purpose

The purpose of the Order is to prevent SSOs. ETWD is required to prepare and maintain the SSMP to support this purpose.

The District shall properly fund, manage, operate and maintain, with adequately trained staff and/or contractors possessing adequate knowledge skills and abilities as demonstrated through a validated program at all times, all parts of the sewage collection system owned and/or operated by the discharger.

### 2.2 Goals

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.

As required by the SWRCB, a copy of the Order is maintained at appropriate locations (including the office of the Operations Superintendent, Compliance Program Coordinator, Collection System Manager and the Collection System Supervisor and is available to sanitary sewer system operating and maintenance personnel at all times. A copy of the Order is included as **Appendix A** of this SSMP.

### 2.3 About This Document

The El Toro Water District has prepared and revised this SSMP to ensure compliance with the State Order. The SSMP provides a general description of how ETWD complies with the various provisions of the Order and provides references to supporting documents. Generally the support materials are not physically included in the SSMP. References will be provided within the SSMP that identifies the appropriate support materials.

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## CHAPTER 3 – ORGANIZATION

This chapter describes El Toro Water District’s organization and chain of communication.

### 3.1 Authorized Representative

The Order requires the SSMP identify the name of the responsible or authorized representative as described in Section J of the Order. Section J requires:

- (i) All reports required by the Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described below.
- (ii) An individual is a duly authorized representative only if:
  - a) The authorization is made in writing by a person described in paragraph (i) of this provision; and
  - b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

The authorized representative for the El Toro Water District, in compliance with the requirements of the Order, is the District’s General Manager, Robert Hill.

### 3.2 Management, Administrative and Maintenance Positions

The Order requires that the SSMP include 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.

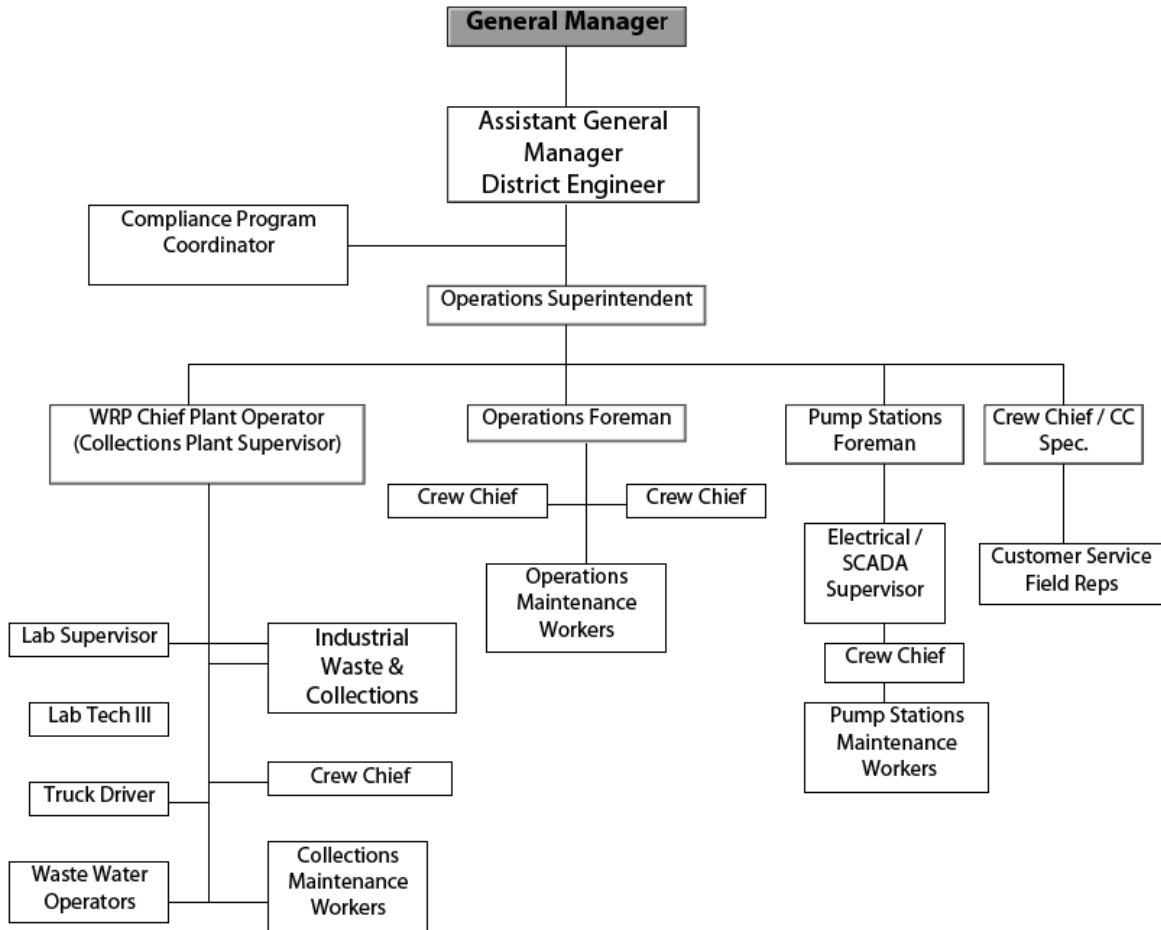
**3.2.1 Compliance Summary.** The currently staffed positions are described in this section. The positions described provide sufficient staffing to operate the sanitary sewer system on a sustainable basis, and to comply with all requirements of this Order.

**3.2.2 Compliance Documents.** The organization chart described in Figure 3-1 details the filled positions of the ETWD organizational structure.

**3.2.3 Roles and Responsibilities.** The high maintenance standards imposed on each of the various components of the ETWD collection system are fulfilled by several departments within the ETWD Operations Department. The Operations Superintendent oversees the cooperative efforts of each of the following departments:

FIGURE 3-1

**EL TORO WATER DISTRICT  
2016 / 2017 ORGANIZATIONAL CHART**



**Collections System Maintenance Department:** The Collections System Maintenance Department, headed by the Collection System Supervisor, reports to the Collections System Manager/Waste Recycling Plant, Chief Plant Operator (WRP CPO). The Collections System Maintenance Department performs the actual maintenance of the sewer collection system including line cleaning, CCTV inspection, root abatement and response to customer sewer complaints.

**Industrial Waste/FOG Control Department:** The Industrial Waste Inspector/FOG Control Manager reports to the Collection System Manager. The Industrial Waste Inspector/FOG Control Manager is charged with the maintenance and enforcement of the ETWD Pretreatment program, the ETWD Fats, Oils and Grease (FOG) program and ETWD standards.

**Pump Stations Department:** The Pump Stations Department, headed by the Pump Stations Foreman, reports directly to the Operations Superintendent. The Pump Stations Department performs all preventative and corrective maintenance on the ETWD sewage lift stations.

**Operations Department:** The Operations Department, headed by the Operations Foreman, reports directly to the Operations Superintendent. The Operations department performs all repair work on sewer force mains, gravity collection system piping and sewer laterals.

**Standby Personnel:** The District maintains a system of standby or “On-Call” personnel to deal with collection system issues after normal business hours. At all times four trained ETWD personnel are on call to provide 24 hour response to any collection system or Water Recycling Plant problem. The first of the four is a representative from the Collections System Maintenance Department who is “On-Call” primarily to respond to SSOs. Two other “On-Call” personnel include the “Primary” On-Call person and the “Secondary” On-Call person. The person serving as the Primary is a representative from either the Pump Stations Department or the Operations Department. The ETWD SCADA System is capable of immediate notification of the Primary On-Call person in the event of an alarm at any of the District’s sewer lift Stations. The Primary is responsible to respond to any SCADA generated alarm or customer complaint after normal business hours. The Secondary On-Call person is a supervisor from either the Pump Stations Department or the Operations Department. The Secondary serves as a backup to the Primary and will respond either to assist the Primary or in the unlikely event the Primary is unable to respond. The final On-Call Person is a certified operator on standby to respond to problems or alarms generated at the Water Recycling Plant.

**3.2.3.1 Contact Information.** The Order requires the SSMP identify names and telephone numbers for management, administrative and maintenance positions responsible for implementing specific measures in the SSMP Program. The names and phone numbers for the positions identified above are:

<b>Position</b>	<b>Name</b>	<b>Telephone Number</b>
General Manager	Robert Hill	(949) 837-7050, ext. 219
Asst. General Manager & Dist. Engineer	Dennis Cafferty	(949) 837-7050, ext. 223
Operations Superintendent	Rick Olsen	(949) 837-7050, ext. 217
Compliance Program Coordinator	Nadia Reesman	(949) 837-7050, ext. 248
Collections System Manager, WRP CPO	Mark Pade	(949) 837-7050, ext. 103
Collection System Supervisor	Ralph Palomares	(949) 837-7050, ext. 104
FOG Control Manager	Ralph Palomares	(949) 837-7050, ext. 104
Foreman – Pump Stations	Troy Davis	(949) 837-7050, ext. 226
Foreman – Operations	Ron Hightower	(949) 837-7050, ext. 218

### **3.3 Chain of Communication**

The SWRCB Order No. W.Q. 2013-0058-EXEC requires a specified chain of communications for all Categories of SSO reporting, 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.

**3.3.1 Compliance Summary.** The following describes the chain of communication for reporting SSOs. It starts with the receipt of a complaint or other information, and includes the name and title of the person responsible for reporting SSOs to the SWRCB, RWQCB, Orange County Health Care Agency (OCHCA), and State Office of Emergency Services (OES). Reporting to the OES is required for all discharges that could potentially reach any storm drain conveyance system and Waters of the State.

The following description is an excerpt from the ETWD Sewer Spill Response Plan.

*When the District is notified of a possible sewage spill of any size it is imperative that all information known about the spill and any potential impacts is communicated to the Operations Superintendent, Assistant General Manager and the Compliance Program Coordinator as soon as possible. The Field Supervisor Spill Report Form should be used to record information regarding a spill as soon as the information is received by the District. The Assistant General Manager shall notify the General Manager of all sewer spills as soon as possible.*

*During normal work hours the On-Site Supervisor shall complete the Field Spill Report and submit it to the Compliance Program Coordinator on the same day as the*



*occurrence. The Field Spill Report for spills which occur after normal work hours or on weekends shall be submitted to the Compliance Program Coordinator on the day after the occurrence or on the first scheduled workday immediately following the occurrence.*

*The On-Site Supervisor must contact, or one individual should be delegated by the On-Site Supervisor to be responsible for contacting, all necessary District personnel.*

*Once the essential District personnel have been contacted, the On-Site Supervisor is responsible for verifying that the appropriate regulatory agencies have been immediately contacted by either calling them himself, or by delegating the task to someone else. In the event the spill exceeds 1,000 gallons of estimated volume or the spill enters any storm drain the following agencies shall also be contacted immediately:*

*California Office of Emergency Services (OES)*

*Orange County Health Department (OCHD)*

*Regional Water Quality Control Board (RWQCB) - Santa Ana (R8) or San Diego (R9)*

*County Flood Control*

*City*

*South Orange County Wastewater Authority (SOCWA)*

It is ultimately the responsibility of the Compliance Program Coordinator to ensure and verify the above described and any other appropriate contacts and notifications are made in a timely manner. The Compliance Program Coordinator is also responsible for the preparation and submittal of the ensuing written report via the CIWQS online database.

**3.3.2 Compliance Documents.** The chain of communication as well as all applicable contact information is defined in the ETWD Sewer Spill Response Plan.

**3.3.3 Roles and Responsibilities.** The roles and responsibilities of each chain (position) in the line of communications are described in detail in the ETWD Sewer Spill Response Plan.

## CHAPTER 4 – LEGAL AUTHORITY

This chapter describes the legal authority to implement the SSMP plans and procedures.

The Order requires that each Enrollee must demonstrate, through sanitary sewer 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;
- (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 District;
- (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.

### 4.1 Compliance Summary

This SSMP complies with the Order requirements for legal authority under the following enacted ordinances/resolutions or agency policies defined below.

The control of infiltration, the requirement that sewers and connections be properly designed and constructed and the requirement for testing and inspection of new lateral connections and bypass piping facilities are each legally enforced through Ordinance No. 2004-1 adopted by the El Toro Water District Board of Directors on April 22, 2004. Standards for construction and inspection of sewer facilities are maintained in the El Toro Water District Standard Specifications for Construction of Water and Sewer System Facilities.

Legal authority for control of fats, oil and grease was enhanced on December 23, 2004 when the Fats, Oils & Grease Control Regulations Applicable to Food Service Establishments were adopted by the Board of Directors.

Legal authority for the control of industrial waste or any wastewater discharge is provided by Ordinance 1997-1 that establishes the El Toro Water District Waste Discharge Pretreatment and Source Control Program.

### 4.2 Compliance Documents

The legal authority for enacting the SSMP programs and policies are included in the following documents:

- Ordinance No. 2004-1 adopted April 22, 2004 - Ordinance of the Board of Directors of the El Toro Water District Providing for the Adoption of Rules and Regulations in Compliance with SWRCB Order No. 2006-0003-DWQ of the California State Water Resources Control Board.

- Fats, Oils & Grease Control Regulations Applicable to Food Service Establishments, Schedule 7-S of the El Toro Water District Rules and Regulations, adopted December 23, 2004.
- Ordinance No. 1997-1 adopted in 1997 – An Ordinance of Regulations for the Discharge of Wastewater to Facilities of the El Toro Water District.

### 4.3 Roles and Responsibilities

The roles and responsibilities for enforcement of the legal authority to enact the SSMP programs and policies are derived from acts of the District's governing Board of Directors. Interpretation of the enabling state legislation giving authority to the District is provided by the District's legal Counsel.

The El Toro Water District General Manager is specifically authorized by the above described Ordinances and Regulations to review, update and revise the District's SSOPP, Standard Specifications and FOG Control Program from time to time as he deems appropriate.

The following personnel are responsible for the implementation of the Sewer System Management Plan and the Enforcement of the District's construction Standards.

Operations Superintendent – Maintains ultimate responsibility, under the oversight of the Assistant General Manager, for the maintenance of the collection system and the installation of the infrastructure.

Compliance Program Coordinator – Under the oversight of the Assistant General Manager, is responsible for the reporting requirements associated with SSOs.

Collection System Manager – The Collection System Manager reports to the Superintendent of Operations. The Collection System Manager supervises the Collection System Department and is responsible for verification that the policies and procedures defined in the District's SSOPP are implemented.

Collection System Supervisor – The Collection System Supervisor reports to the Collection System Manager. The Collection System Supervisor supervises the Collection System maintenance personnel. The Collections System Supervisor is responsible for the daily implementation of the maintenance programs defined in the SSOPP. The Collection System Supervisor also functions as the FOG Control Manager. In that capacity he is responsible for inspections and the enforcement of the District's FOG Rules and Regulations. The Collection System Supervisor further functions as the Industrial Waste Inspector performing inspections and enforcement of the pretreatment program.

Inspector – The District Inspector reports to the Operations Superintendent. The District Inspector is responsible for ensuring compliance with the District's Standard Specifications for the construction of any new sewer facilities.

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## CHAPTER 5 – OPERATION AND MAINTENANCE PROGRAM

This SSMP includes the elements listed below as required by the Order:

- (a) Maintain an up-to-date map of the sanitary sewer system showing all gravity line segments and manholes, pumping facilities, and pressure pipes and valves;
- (b) Describe routine preventive 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 for 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 parts inventories, including identification of critical replacement parts.

### 5.1 Engineering Data Management

Section (iv) (a) of the Order requires the District maintain an up-to-date map of the sanitary sewer system showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves.

**5.1.1 Compliance Summary.** The District maintains detailed sewer Atlas Maps showing the sewer collection system including pump stations, forcemains, gravity lines, manholes and other conveyance facilities and surrounding reference features. The Atlas Maps are maintained in most District operations vehicles and in a various locations in the District offices. The District also maintains a digital database of the entire collection system.

The collection system mapping data is kept current through a closed-loop detailed change management process. This process ensures that newly constructed or reconfigured facilities, as well as field-discovered items needing a drawing or record change, are updated in digital format

The District maintains record drawings of each sewer lift station in the Engineering office.

**5.1.2 Compliance Documents.** Documents which support compliance of this section include the following:

- Sewer System Atlas Map
- Sewer System Composite Map
- Pump station drawings are on file and available for staff use in the District's engineering office.

**5.1.3 Roles and Responsibilities.** Collection system maps and record drawings are owned and maintained by the District Engineering Department. The District Engineering Associate, under supervision of the Project Engineer, is responsible for electronic updates of Atlas Maps as well as maintenance of the District's record drawings.

## 5.2 Preventive Operations & Maintenance

Section (iv) (b) of the Order requires the District conduct routine preventive operation and maintenance activities.

The District uses SCADA at all lift stations with high level alarms that will contact On-Call personal to respond.

**5.2.1 Compliance Summary.** The El Toro Water District has an on-going preventive and corrective maintenance program. The maintenance programs and procedures for the El Toro Water District sanitary sewer system are described in detail in the District's Sanitary Sewer Overflow Prevention Plan (SSOPP). The SSOPP is incorporated herein by reference. The District's preventive maintenance program, as documented in the SSOPP in considerable detail, consists of, but is not limited to, the following program components.

- a. The District conducts routine line cleaning with the objective of cleaning the entire system on a rotating basis every 2 years. The District averages 300,000miles of cleaning per year.
- b. The District conducts weekly cleaning to satisfy the objectives of the High Frequency Cleaning (Hot Spots) Program.
- c. The District visually inspects the entire collection system on a rotating basis every 5 years using CCTV equipment.
- d. The District conducts an on-going root abatement program to maintain, at scheduled frequencies, sections of pipe identified as vulnerable to root intrusion.
- e. The District conducts preventive maintenance at each lift station to ensure the active and backup facilities are in good working order at all times.
- f. The District continues to repair identified structural deficiencies in the collection system on a priority basis.

The District documents the progress of the sanitary sewer maintenance activities as described in Chapter 10.

**5.2.2 Compliance Documents.** Documents which support compliance of this section include the following:

- Sanitary Sewer Overflow Prevention Plan
- Hot Spots Program Manual

**5.2.3 Roles and Responsibilities.** The Collection System Maintenance staff inclusive of the Collection System Manager, the Collection System Supervisor and the Collection System Crew Chief and staff are responsible for the daily implementation of the collection system preventive maintenance programs as defined herein and further described in the SSOPP. The Pump Stations Department is responsible for the preventive and corrective maintenance of all sewer lift station facilities.

### 5.3 Sewer Rehabilitation and Replacement Plan

Section (iv) (c) of the Order requires the District 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.

**5.3.1 Compliance Summary.** The District performs on-going CCTV inspection of the collection system as described herein and in the SSOPP. The CCTV program has inspected the entire sewer system and is now working on a third cycle through the system. Structural deficiencies identified in the CCTV program are assigned to the Operations Department for repair as part of the District's Sewer System Repair Project. The repairs are prioritized based on severity on a scale of 1 – 4. The Operations Department schedules repairs according to the assigned priority. The District has dedicated manpower to continuing the repairs on a priority basis.

Nothing in the existing CCTV inspections would lead the District to believe any of the system is approaching the end of its useful service life. Only the oldest portions of the ETWD service area were built in the 1960's. It is typically expected that vitrified clay pipe, which comprises the majority of the ETWD collection system infrastructure, should provide in excess of 100 years of useful life. No part of the system is approaching this age nor shall it for many years. It is the District's intent to perform an asset management evaluation in the near future to project long-range replacement programs and costs. This analysis will be used to develop financial plans to accommodate the costs of future, long term, infrastructure rehabilitation needs.

Certain upgrade or rehabilitation projects at select sewer lift stations have been completed, while others are already identified in the District's 5-year and 10-year Capital Facility Replacement and Refurbishment Plans (CFRRP). These projects are typically intended to replace aging mechanical or electrical facilities. The asset management analysis will consider the lift station facilities in addition to the collection system piping.

The District maintains adequate capital reserves to fund the Capital Facility Replacement and Refurbishment Plan. In addition the District has a dedicated revenue source to fund capital projects in the form of the Capital Surcharge on the monthly customer bills.

**5.3.2 Compliance Documents.** The documents supporting compliance with the sewer system rehabilitation requirements are as follows:

- Sanitary Sewer Overflow Prevention Plan
- ETWD Mainline and Lateral Repair Log
- Operation and Maintenance Activities
- CFRRP 5-Year Plans

#### 5.4 Training Program

Section (iv) (d) of the Order requires the El Toro Water District to provide training on a regular basis for staff in sanitary system operations and maintenance, and require contractors to be appropriately trained.

**5.4.1 Compliance Summary.** ETWD's collection system maintenance staff currently participates in the CWEA certification program for collection workers, Grades I through IV.

All of the District's field operations staff is regularly trained on the guidelines and principles described in the Districts Sewer Spill Response Plan.

#### 5.5 Inventories

Section (iv) (e) of the order requires the District provide equipment and replacement part inventories, including identification of critical replacement parts.

**5.5.1 Compliance Summary.** The District maintains adequate inventory of repair parts for the collection system piping. These parts typically include, pipe of various sizes and materials, repair clamps and other miscellaneous material necessary to position the District to effect immediate scheduled or emergency repairs.

The District also maintains an inventory of spare parts for each sewer lift station. The critical spare parts inventory includes one spare pump and motor for each lift station, spare flexible discharge piping and clamps for the submersible lift stations and spare drive shafts for the lift stations with drive shafts.

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## CHAPTER 6 – DESIGN AND PERFORMANCE PROVISIONS

The Order requires the Enrollee to maintain

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

### 6.1 Compliance Summary

The standards, specifications and procedures exist and are available for review at the District's Engineering office. All past and current work has been guided by these various standards and specifications that are on file now and subject to change as needed. Major projects are guided and defined by specific project plans and specifications developed by design engineers under contract to the District.

### 6.2 Compliance Documents

The documents used for design and performance evaluations include the following:

- Standard Specifications for Construction of Water and Sewer System Facilities

### 6.3 Roles and Responsibilities

The positions, roles, and responsibilities of the Design and Performance staff are as follows:

**Inspector** – The District Inspector reports to the Operations Superintendent. The District Inspector is responsible for ensuring compliance with the District's Standard Specifications for the construction of any new sewer facilities.

**Project Engineering** – The Project Engineer is responsible for any appropriate updates to the Standard Specifications and in coordination with the District Inspector oversees any contractual work by engineering consultants or outsourced inspectors.

**Engineering Associate** – The Engineering Associate, under the direction of the Project Engineer, prepares updates to the text or drawings that comprise the Standard Specifications.



## CHAPTER 7 – OVERFLOW EMERGENCY RESPONSE PLAN

Under the Order, each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan shall 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 an appropriate response to all overflows;
- (c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities 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 should identify the officials who will receive immediate notification;
- (d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

### 7.1 Compliance Summary

The El Toro Water District response to SSOs is guided and defined by the existing ETWD Sewer Spill Response Plan (SSRP). The SSRP is updated periodically as necessary with the most recent update occurring in February 2017.

The SSRP includes detailed notification and response procedures. A copy of the SSRP has been distributed to each District employee that has the potential to participate in the response to an SSO. ETWD staff are trained on the policies and procedures described in the SSRP when they are hired. On-going training of all staff is conducted whenever the SSRP is updated. The SSRP is generally updated on an annual basis or more frequently as necessary.

The primary responders are notified immediately in the event of an SSO. Such notification typically comes from the automatic dialer component of the SCADA system for pump station failures or from customer calls. Notification of after-hours emergency customer calls is made to the on-call person immediately by the ETWD voicemail system.

## 7.2 Compliance Documents

The compliance documents are as follows:

- Sewer Spill Response Plan

## 7.3 Roles and Responsibilities

The positions, roles, and responsibilities are defined in the SSRP and are summarized as follows:

**Primary On-Call Person** – The District has four people on call at all times. The primary on-call person is typically the first to respond to an after hours SSO. The District's primary on-call personnel are trained in the tenets of the Sewer Spill Response Plan. The personnel who stand call as the Primary On-Call person are equally likely to participate in any normal hours SSO response.

**Secondary On-Call Person** – The secondary on-call person is a foreman or crew chief on-call to back up and supervise the primary on-call person. During an after-hours SSO the secondary on-call person functions as the on-site supervisor assuming primary management and coordination of all emergency response actions and reports. The foremen or crew chiefs who stand call as the secondary may also serve as the on-site supervisor during a normal hours SSO response.

**Collections System On-Call Person** – A member of the collections system maintenance department is also on-call at all times. The primary on-call person will notify the collections system on-call person in the event of an SSO. The collections system on-call person will respond with the appropriate maintenance and/or containment equipment.

**Compliance Program Coordinator** – The Compliance Program Coordinator is notified in the event of any SSO. The Compliance Program Coordinator will coordinate and verify all reporting procedures, as defined in the SSRP, are carried out and all regulatory requirements are met.

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## CHAPTER 8 – FATS, OILS, AND GREASE CONTROL PROGRAM

Under the Order, the El Toro Water District is responsible for preparing and implementing a fats, oil and grease (FOG) source control program to reduce the amount of these substances discharged to the sanitary sewer system. The plan shall include the following:

- (a) An implementation plan and schedule for a public education outreach program that promotes the 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 mechanical grease removal devices or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- (e) Authority to inspect grease-producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;
- (f) An identification of sanitary 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 sanitary sewer system for each section that is subject to FOG blockages.

### 8.1 Compliance Summary

The El Toro Water District has a long history of operating a FOG Control Program. ETWD initiated FOG Control Activities in 1991 to prevent FOG related blockages and SSOs. The District conducts annual inspections of over 190 FSEs within the District service area and requires grease interceptors, where appropriate, for new construction of FSEs.

ETWD also conducts an aggressive maintenance program of the sewer collection system in order to mitigate the impacts of FOG that does enter the system. The maintenance program, defined in more detail in SSOPP includes an extensive high frequency maintenance area cleaning program consisting of 60 different locations. .

While no SSO is acceptable, the relatively small number of FOG related SSOs experienced in the ETWD service area is a testament to the effectiveness of ETWD's existing maintenance program and the FOG Control and Source Control Programs. The District Board of Directors adopted the Fats, Oils & Grease Control Regulations Applicable to Food Service Establishments in December,

2004. At the same time, the District developed a FOG Control Program Operations Manual to serve as a guide to the implementation of the Board adopted FOG regulations.

ETWD's existing multi-faceted FOG program, including both FOG control and system maintenance, has been extremely successful in minimizing the number of FOG related SSOs as well as the associated volume of the overflows.

The FOG Control Program is based on ETWD's historical FOG control activities and the requirements of the WDR. This program integrates various elements into the program to accomplish the goal. These key elements of the program are: sewer line maintenance activities; FOG Control Regulations; a Permit and inspection process to minimize the discharge of FOG from FSEs; an educational outreach program to minimize the discharge of FOG from multi-family housing and single family homes; and the District's Waste Discharge Pretreatment and Source Control Program for discharge of FOG from the limited industrial sector served by the District. Further detail about the program may be found in the text of the regulations or in the FOG Control Program Manual.

## **8.2 Compliance Documents**

The FOG control program activities are documented under the following ordinances, reports, and studies:

- Fats, Oils & Grease Control Regulations Applicable to Food Service Establishments, Schedule 7-S of the El Toro Water District Rules and Regulations, adopted December 23, 2004.
- FOG Control Program Operations Manual
- Hot Spots Program Manual

## **8.3 Roles and Responsibilities**

The positions, roles, and responsibilities of the staff in the FOG control program are as follows:

FOG Control Program Manager – The FOG Control Program Manager bears the primary responsibility for implementation and enforcement of the FOG Control Program. The FOG Control Program Manager performs annual and semi-annual inspections of FSE's, coordinates the FSE permitting program, reviews and comments on plan check submittals to assess the need for grease control devices, coordinates public outreach and education relative to FOG and, as Collection System Supervisor, monitors the effectiveness of the Hot Spot program.

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## CHAPTER 9 – SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

As prescribed by the Order, the El Toro Water District is required to prepare and implement a capital improvement plan that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. 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 an SSO discharge caused by hydraulic 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 above to establish appropriate design criteria; and
- (c) **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term capital improvement plan to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The capital improvement plan may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The capital improvement plan 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 plan. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements.

### 9.1 Compliance Summary

The El Toro Water District has performed a detailed hydraulic analysis of the entire sewer collection system. The ETWD Master Plan analysis determined that the existing collection system has adequate capacity to accommodate existing and future flows. No capacity enhancement projects are necessary at this time. The District will continue to evaluate the system to assess capacity, development and infrastructure replacement requirements.

Compliance with the specific requirements of the Order are described as follows:

**9.1.1 Evaluation.** Other than an isolated incident resulting from a contractor flushing into a manhole, the El Toro Water District has never had an SSO resulting from I&I or insufficient capacity in the collection system. The evaluation of the ETWD collection system cannot, therefore, be based on analysis of previous SSOs. Instead, the District completed a detailed analysis of the entire collection system as part of an update to the ETWD Master Plan. A hydraulic model of the collection system was constructed and calibrated by multiple sewer flow meters to evaluate the capacity of the system and to identify any portions of the collection system that could experience or

contribute to an SSO discharge caused by hydraulic deficiency. Included in the evaluation are estimates of peak flows, flows from potential redevelopment within the ETWD service area and flows from anticipated wet weather events. The analysis concluded that the ETWD sanitary sewer system contains sufficient capacity to accommodate current and projected future average and peak flows.

**9.1.2 Design Criteria.** The ETWD Master Plan defines design criteria for the sewer collection system including peaking factors, I&I factors, slope, depth to diameter ratios and velocity criteria.

**9.1.3 Capacity Enhancement Measures.** The El Toro Water District, after a detailed analysis of the capacity of the collection system, has identified no hydraulic deficiencies that require capacity enhancement. The District will continue to evaluate the system and potential development to ensure sufficient capacity is maintained.

**9.1.4 Schedule.** This plan will be updated as necessary. The updates will describe any significant changes in proposed development or in hydraulic capacity of the system that may generate capacity enhancement projects.

## **9.2 Compliance Documents**

The documents used for system evaluation and capacity assurance are as follows:

- Water and Sewer Master Plan, Final Report
- CFFRP 5-Year Plans

## **9.3 Roles and Responsibilities**

The on-going evaluation of system capacity and the CFFRP development, implementation, and update is the responsibility of the District Engineer.

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## CHAPTER 10 – MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

The Order requires the Enrollee to:

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

**10.1 Compliance Summary.** The El Toro Water District continues to monitor the implementation of the SSOPP and each element of the SSMP. The following mechanisms are used in various forms to document and monitor the maintenance of the sanitary sewer system:

- MMS Tickets – MMS Tickets are used by ETWD maintenance personnel to document maintenance activities in the Districts Maintenance Management System:
  - Sewer Lift Station Maintenance Activities
  - CCTV Identified Repair Sites
  - Documentation of Sewer Repairs
- TV & Mainline Repair Report – Log describing sewer repair program including:
  - Repair Locations
  - Repair Priorities
  - Date Deficiency Identified
  - Date Repair Completed
  - Overall Production Status
- CCTV Logs – Documentation of daily production for the CCTV Inspection Program
- Line Cleaning Logs – Documentation of daily production for:
  - Sewer Line Cleaning
  - High Frequency Cleaning (Hot Spots)
  - Root Abatement
- Collection System Activity Report – Provides an overall summary of the collection system maintenance program on a monthly basis.
- FOG Inspection Reports – Monthly reports of inspections conducted by the FOG Control Program Manager including individual inspection reports and monthly summary.
- Unauthorized Sewer Discharge Summary – The District maintains an on-going summary log of SSOs on a monthly basis including, but not limited to, dates, locations, causes and volumes. The summary allows the District to identify and respond to any SSO trends.

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## CHAPTER 11 – SSMP PROGRAM AUDITS

As a part of the SSMP, the El Toro Water District 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 including identification of any deficiencies in the SSMP and steps to correct them.

### 11.1 Compliance Summary

The El Toro Water District has an internal audit program that will be expanded to cover the WDR program and its elements. Internal audits were conducted prior to the final submittal of the final SSMP to ensure that it meets all requirements. The last internal audit for 2012-2013 was completed in October 2014.

The Compliance Program Coordinator will coordinate agency-wide internal audits. The audits will include evaluation of monthly production, attainment of goals and compliance with the policies and procedures defined in the SSOPP and referenced herein.

The Operations Superintendent and Collections System Manager will develop and implement strategies to correct any identified deficiencies.

### 11.2 Compliance Documents

The documents used for audit evaluations include the following:

- Month End Logs and Reports
- SSO Log

### 11.3 Roles and Responsibilities

The positions, roles, and responsibilities of the audit staff are as follows:

The Compliance Program Coordinator will work with the Operations Superintendent and Collections System Manager to coordinate audits and to verify the implementation and success of the SSMP.



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## CHAPTER 12 – COMMUNICATIONS

The Order requires the discharger to communicate on a regular basis with interested parties on the implementation and performance of the SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.

**12.1 Compliance Summary.** The El Toro Water District will communicate on a regular basis with any interested parties on the implementation and performance of this SSMP. The communication program will allow any interested parties to provide input as the program is developed and implemented.

ETWD Staff prepares and submits a monthly Collection System Activity Report to the District Board of Directors included in the Board package at monthly public meetings. The report identifies production for line cleaning, CCTV inspection and root abatement.

The El Toro Water District submits a report to the SWRCB for each occurrence of SSOs. In those months that no spill occurs the Collection System Manager generates a “No Spill Certification” on the California Integrated Water Quality System (CIWQS) website.

The SSMP will be posted on the District’s website to allow the public access for review and input of the plan documents.

### 12.2 Compliance Documents

- Collection System Activity Report
- SSO Report Form
- SSMP

### 12.3 Roles and Responsibilities

The positions, roles, and responsibilities of the communications staff are as follows:

The Collections Crew Chief prepares and submits the data included in the Collection System Activity Report to the Compliance Program Coordinator on a monthly basis.

The Compliance Program Coordinator is responsible for the reporting of SSOs or the certification that no SSO has occurred.

**APPENDIX A**

**STATE WATER RESOURCES CONTROL BOARD**  
**Order No. 2006-0003 -DWQ**

**Statewide General Waste Discharge Requirements**  
**for Wastewater Collection Agencies**

**APPENDIX B**

**STATE WATER RESOURCES CONTROL BOARD**  
**Order No. 2006-0003-DWQ**

**Statewide General Waste Discharge Requirements**  
**for Wastewater Collection Agencies**

**FACT SHEET**

**APPENDIX C**

**STATE WATER RESOURCES CONTROL BOARD**

**Order No. WQ 2013-0058-EXEC**

**Statewide General Waste Discharge Requirements  
for Sanitary Sewer Systems**

**MONITORING AND REPORTING PROGRAM (MRP)**