

# City of Tracy

## Sewer System Management Plan

### Internal Audit

Evaluation Period  
from 2009 to 2022

**FINAL**

JUNE 2023

Prepared for:

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**ABBREVIATIONS**

BMP	Best Management Practices
CCTV	Closed-Circuit Television
CIP	Capital Improvement Plan
City	City of Tracy
CIWQS	California Integrated Water Quality System
CMOM	Capacity, Management, Operation, and Maintenance
CWA	Clean Water Act
EPA	Environmental Protection Agency
FOG	Fats, Oil, and Grease
I/I	Inflow/Infiltration
MRP	Monitoring Report Program
NPDES	National Pollutant Discharge Elimination System
OES	Office of Emergency Services
PM	Preventative Maintenance
R&R	Rehabilitation and Replacement
SSO	Sanitary Sewer Overflow
SWRCB	State Water Resources Control Board
WDRs	Waste Discharge Requirements

## 1 Introduction

On May 2, 2006, the State Water Resources Control Board (SWRCB) adopted Order No. 2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. Under Order No. 2006-0003-DWQ, the City of Tracy (City) shall conduct periodic internal audits, appropriate to the size of the system and the number of sanitary sewer overflows (SSOs). At a minimum, these audits should occur every two years and a report must be prepared and kept on file.

In 2009, the City prepared a Sewer System Management Plan (2009 SSMP) to satisfy the requirements of Order No. 2006-0003-DWQ. No internal audits have been prepared for the City since Order No. 2006-0003-DWQ was adopted.

On December 6, 2022, the SWRCB adopted the Order WQ 2022-0103-DWQ, Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems. This new General Order becomes effective on June 5, 2023, and supersedes Order No. 2006-003-DWQ and amendments thereafter. Under Order WQ 2022-0103-DWQ, the City shall conduct an internal program audit at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the City's last audit period.

This internal audit was developed for the City to comply with the requirements in Order No. 2006-0003-DWQ and Order WQ 2022-0103-DWQ's requirement to update and implementation of a Spill Emergency Response Plan within six months of the adoption date of the order. The Spill Emergency Response Plan update was considered in this audit because it will apply soon. A copy of Order No. 2006-0003-DWQ and the Order WQ 2022-0103-DWQ are included in **Appendix A**.

### 1.1 Purpose

The purpose of this internal audit is to evaluate the effectiveness of the 2009 SSMP and the City's compliance with the SSMP requirements, including identification of any deficiencies in the SSMP and steps to correct them. This internal audit was prepared to make any corrections necessary for the SSMP Update. Because there are no audits completed for the City, the evaluation period for this internal audit begins on January 1, 2009, to December 31, 2022. The City's operator was involved in completing this internal audit.

At minimum, the audit must:

- Evaluate the implementation and effectiveness of the City's SSMP in preventing spills;
- Evaluate the City's compliance with the Order No. 2006-003-DWQ and Order WQ 2022-0103-DWQ ;
- Identify SSMP deficiencies in addressing ongoing spills and discharges to waters of the State; and
- Identify necessary modifications to the SSMP to correct deficiencies.

The City shall submit a complete audit report that includes:

- Audit findings and recommended corrective actions;
- A statement that sewer system operators' input on the audit findings has been considered; and
- A proposed schedule for the City to address the identified deficiencies.

## 1.2 Background

The requirements for the SSMP are closely related to the Environmental Protection Agency (EPA) Capacity, Management, Operation, and Maintenance (CMOM) rule and constitute a best management practices (BMP) approach to the regulation of collection systems. The SSMP elements are:

- Goals
- Organization
- Legal Authority
- Operation and Maintenance Program
- Design and Performance Provisions
- Spill Emergency Response Plan
- Sewer Pipe Blockage Control Program
- System Evaluation and Capacity Assurance and Capital Improvements
- Monitoring, Measurement, and Program Modifications
- Internal Program Audits
- Communication Program

## 2 SSO Trends and Patterns

### 2.1 Historical SSO Data

Order No. 2006-0003 requires that the City report all SSOs to the California Integrated Water Quality System (CIWQS) online SSO database. Historical records for the City from the online SSO database were reviewed and provided in **Appendix B**. A summary of the SSO reported on the CIWQS online database is shown in **Table 2-1**. The City has reported a total of 46 SSOs and approximately 18,215 gallons of wastewater spill from 2009 to 2022.

**Table 2-1 – SSO Historical Trends**

Year	Reported Total Number of SSO	Reported Total SSO Volume (gallons)
2009	8	1,885
2010	0	0
2011	0	0
2012	14	830
2013	4	820
2014	1	50
2015	1	1,700
2016	1	30
2017	6	4,600
2018	2	3,500
2019	0	0
2020	1	650
2021	2	1,200
2022	6	2,950
<b>Total</b>	<b>46</b>	<b>18,215</b>

### 2.2 Discharges to Waters of the State

The Federal Clean Water Act (CWA) largely prohibits any discharge of pollutants from a point source to waters of the United States except as authorized under a National Pollutant Discharge Elimination System (NPDES) permit. In general, any point source discharge of sewage effluent to waters of the United States must comply with technology-based, secondary treatment standards, at a minimum, and any more stringent requirements necessary to meet applicable water quality standards and other requirements. Unpermitted discharge of wastewater from a sanitary sewer system to waters of the United States is illegal under the CWA.

#### 2.2.1 SSO Categories

For the purposes of reporting, SSOs fall into one of the four categories as defined in the General Order 2022-0103-DWQ. The definitions for each category are listed in **Table 2-2**.

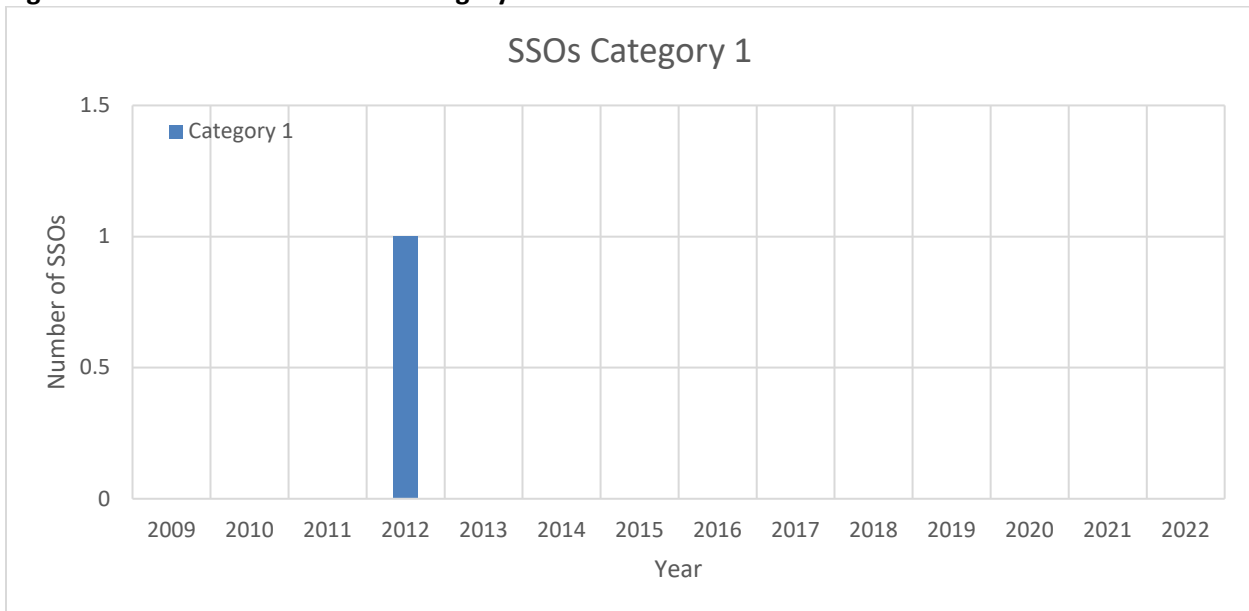
**Table 2-2 – Category Definitions**

Spill Category	Description
Category 1	Spills to surface waters.
Category 2	Spills of 1,000 gallons or greater that do not discharge to surface waters.
Category 3	Spills of equal or greater than 50 gallons and less than 1,000 gallons that do not discharge to surface waters.
Category 4 <sup>1</sup>	Spills less than 50 gallons that do not discharge to surface waters.

<sup>1</sup>Category 4 is a new category that was added to the General Order 2022-0103-DWQ. The historical SSO data on the CIWQS database only shows Categories 1, 2, and 3, where Category 3 was defined as all other spills less than 1,000 gallons.

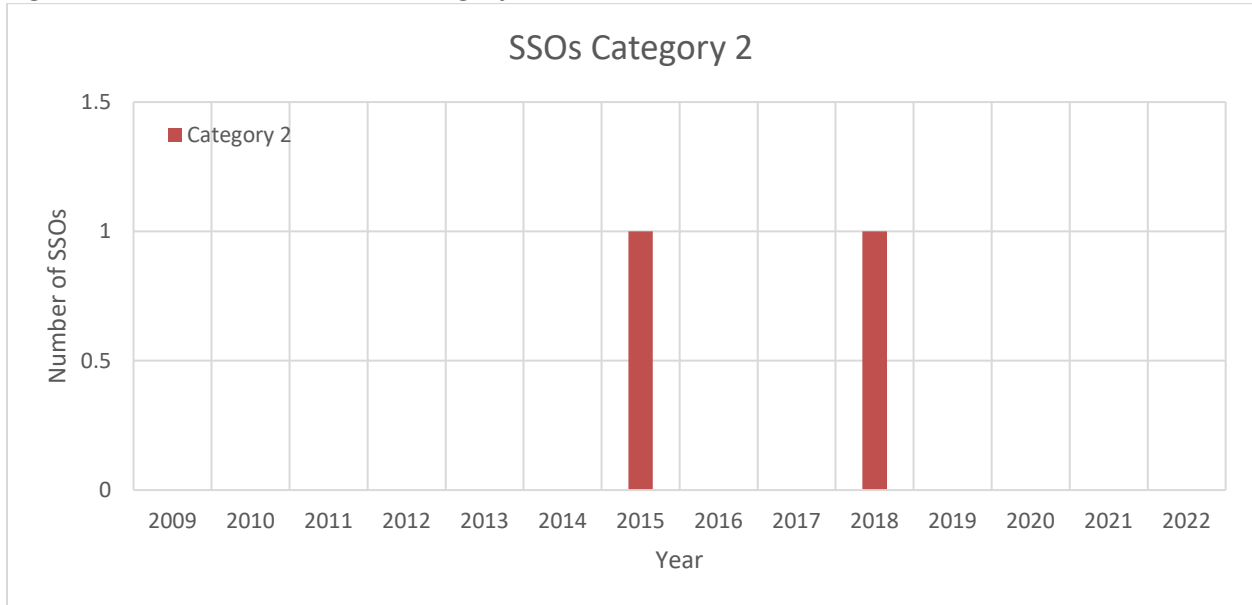
The City’s historical SSO data was analyzed to provide insight into measuring the effectiveness of the 2009 SSMP. There is approximately one reported SSO under Category 1, two reported SSOs under Category 2, and 43 reported SSOs under Category 3 from 2009 to 2022. Refer to **Figures 2-1, 2-2, and 2-3.**

**Figure 2-1 – Number of SSOs for Category 1**

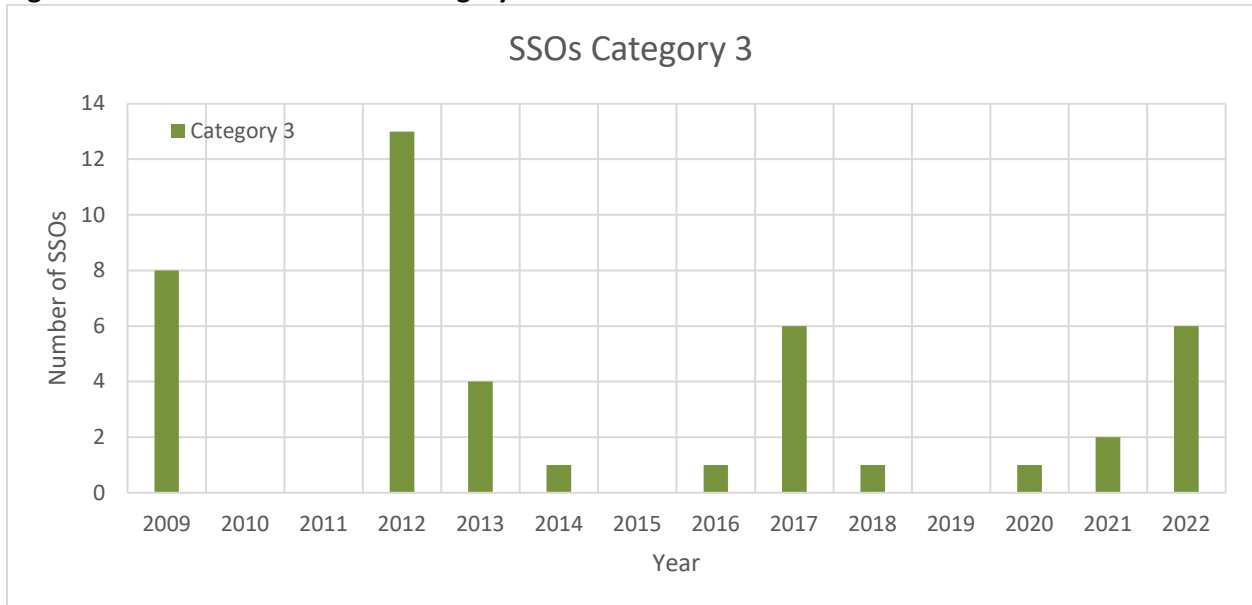




**Figure 2-2 – Number of SSOs for Category 2**



**Figure 2-3 – Number of SSOs for Category 3**



Since 2009, the City has recorded one SSO under Category 1, meaning that discharges from the SSO reached surface water. The Category 1 SSO for the City is summarized in **Table 2-3**.

**Table 2-3 – Volume of Spills Recorded that Reached Surface Water**

Date	Time	Spill Reached Surface Water Volume (gallons)
6/14/2012	4:00 PM	5

The City recorded approximately 1,700 gallons of spill from untreated wastewater on February 16, 2015 and approximately 3,300 gallons of spill on September 6, 2018. These spills are classified under Category 2 because the spills were greater than 1,000 gallons and have not reached surface water. All other SSOs recorded have a spill volume of less than 1,000 gallons.

### 2.3 Environmental and Climate Change

A review of the historical SSO data from 2009 to 2022 shows the spills vary throughout the summer and winter times. Most of the spills occur during the months of February, June, and September. The highest annual SSO recorded is in 2012 with a total of 14 spills for that year. Refer to **Table 2-4** for a summary of the total number of SSOs recorded per month from 2009 to 2022.

**Table 2-4 – Total Number of SSOs per Month from 2009 to 2022**

Year	Month												Annual SSO Total
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
2009	1				1	1		1	2	2			8
2010													0
2011													0
2012		2	1	3		4	3	1					14
2013	1	2		1									4
2014								1					1
2015		1											1
2016											1		1
2017		1				2					1	2	6
2018									2				2
2019													0
2020								1					1
2021												2	2
2022						1			2		3		6
<b>Total</b>	<b>2</b>	<b>6</b>	<b>1</b>	<b>4</b>	<b>1</b>	<b>8</b>	<b>3</b>	<b>4</b>	<b>6</b>	<b>2</b>	<b>5</b>	<b>4</b>	<b>46</b>

### 2.4 Causes and Prevention of Spills

Based on historical SSO data, the most common cause of SSOs were caused by grease deposition. The City is aware of these issues and has adjusted their operation and maintenance practices to address locations which tend to accumulate grease depositions.

### 2.5 Ongoing Spills

A review of current SSO data shows that the last spill occurred on February 18, 2023. There have not been any other documented spills since then.

### 3 Goals

#### 3.1 Current Regulatory Requirements

To meet the requirements in the Order No. 2006-003-DWQ, the goal for 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.

#### 3.2 Audit Findings

**Table 3-1** shows an evaluation of the findings in Section 1 “Goal” of the 2009 SSMP.

**Table 3-1 – Evaluation of “Goal” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The goals listed in the 2009 SSMP follow the requirements in Order No. 2006-0003-DWQ.	The City could improve on minimizing the frequency of SSOs and meeting regulatory requirements related to Order No. 2006-0003-DWQ.	1) Conduct SSMP audits and SSMP updates as required in Order No. 2006-0003-DWQ and Order No. WQ 2022-0103-DWQ. 2) Regularly review operation and maintenance practices and identify potential improvements to reduce the amount and severity of the SSOs.

## 4 Organization

### 4.1 Current Regulatory Requirements

To meet the requirements in Order No. 2006-0003-DWQ, the SSMP must identify:

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

### 4.2 Audit Findings

**Table 4-1** shows an evaluation of the findings in Section 2 “Organization” of the 2009 SSMP.

**Table 4-1 – Evaluation of “Organization” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “Organization” section in the City’s 2009 SSMP complies with the requirements in Order No. 2006-0003-DWQ.	The “Organization” section follows the requirements and is broken down into responsible parties for implementation of the SSMP and broken down by task with contact information.	Update the contact information.

## 5 Legal Authority

### 5.1 Current Regulatory Requirements

To meet the requirements, the City must demonstrate, through sanitary sewer system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- (1) Prevent illicit discharges into its sanitary sewer system (examples may include inflow/infiltration (I/I), stormwater, chemical dumping, unauthorized debris and cut roots, etc.).
- (2) Require that sewers and connections be properly designed and constructed.
- (3) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency.
- (4) Limit the discharge of fats, oils, grease, and other debris that may cause blockages.
- (5) Enforce any violation of its sewer ordinances.

### 5.2 Audit Findings

**Table 5-1** shows an evaluation of the findings in Section 3 “Legal Authority” of the 2009 SSMP.

**Table 5-1 – Evaluation of “Legal Authority” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “Legal Authority” section in the 2009 SSMP complies with the requirements in the Order No. 2006-0003-DWQ.	The City’s Municipal Code, Title 5-Sanitation and Health, Chapter 5.24-Waste Disposal and Chapter 5.26-Discharge of Fats, Oils and Grease provide the necessary legal authority for the sewer collection system.	No recommended modification required.

## 6 Operations and Maintenance Program

### 6.1 Current Regulatory Requirements

To meet the requirements in the Order No. 2006-0003-DWQ, the SSMP must include those elements listed below that are appropriate and applicable to the City’s system:

- (1) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities;
- (2) 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;
- (3) Develop a rehabilitation and replacement (R&R) 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 scheduling rehabilitation. R&R should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the R&R 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;
- (4) Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
- (5) Provide equipment and replacement part inventories, including identification of critical replacement parts.

### 6.2 Audit Findings

**Table 6-1** shows an evaluation of the findings in Section 4 “Operation and Maintenance Program” of the 2009 SSMP.

**Table 6-1 – Evaluation of “Operation and Maintenance Program” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “Operation and Maintenance Program” section in the 2009 SSMP complies with the requirements in Order No. 2006-0003-DWQ.	This section is effective by providing an up-to-date map, operation and maintenance routine, an R&R plan, training, and description of equipment and replacement part inventories.	Update the ESRI maps to reflect upgrades and new development.

## 7 Design and Performance Provisions

### 7.1 Current Regulatory Requirements

To meet the requirements in Order No. 2006-0003-DWQ, the SSMP must include the following:

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

### 7.2 Audit Findings

**Table 7-1** shows an evaluation of the findings in Section 5 “Design and Performance Provisions” of the 2009 SSMP.

**Table 7-1 – Evaluation of “Design and Performance Provisions” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “Design and Performance Provisions” section in the 2009 SSMP complies with the requirements in the Order No. 2006-0003-DWQ.	This section is effective by providing calculations, designs, standard plans, and inspecting testing.	The City’s design standards have been updated since the 2009 SSMP was prepared. Reference the most current design standards in the SSMP Update.

## 8 Overflow Emergency Response Plan

### 8.1 Current Regulatory Requirements

To meet the requirements in the Order No. 2006-0003-DWQ, the City shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

- (1) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- (2) A program to ensure an appropriate response to all overflows;
- (3) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g., health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the monitoring report program (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;
- (4) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (5) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (6) 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.

Order 2006-003-DWQ required that the SSMP include an Overflow Emergency Response Plan. Under Order WQ 2022-0103-DWQ, this requirement was changed to a Spill Emergency Response Plan and existing enrollees with regulatory coverage under Order 2006-003-DWQ are required to update and implement its Spill Emergency Response Plan by June 5 (within six months of the adoption date). The updates required the plan to include the procedures listed above.

### 8.2 Audit Findings

**Table 8-1** shows an evaluation of the findings in Section 6 “Overflow Emergency Response Plan” of the 2009 SSMP.



**Table 8-1 – Evaluation of “Overflow Emergency Response Plan” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “Overflow Emergency Response Plan” section in the 2009 SSMP complies with the requirements in the Order No. 2006-0003-DWQ.	The SSMP is effective in meeting the requirements as it includes the required procedures and responses to SSOs.	Update the stand-alone Spill Emergency Response Plan to address any changes in staffing or notification requirements and complies with the requirements of Order WQ 2022-0103-DWQ.

## 9 Fats, Oils, and Grease (FOG) Control Program

### 9.1 Current Regulatory Requirements

To meet the requirements in Order No. 2006-0003-DWQ, the City shall evaluate its service area to determine whether a FOG control program is needed. If the City determines that a FOG program is needed, the City must provide justification for why it is not needed. If the FOG is found to be a problem, the City must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- (1) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- (2) 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;
- (3) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- (4) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping, and reporting requirements;
- (5) Authority to inspect grease producing facilities, enforcement authorities, and whether the City has sufficient staff to inspect and enforce the FOG ordinance;
- (6) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- (7) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (6) above.

### 9.2 Audit Findings

**Table 9-1** shows an evaluation of the findings in Section 7 “FOG Control Program” of the 2009 SSMP.

**Table 9-1 – Evaluation of “FOG Control Program” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “FOG Control Program” section in the 2009 SSMP complies with the regulatory requirements in Order No. 2006-0003-DWQ.	Although this section is in compliance, it could be improved given that 80% of all SSOs in the sanitary sewer system were caused by grease depositions.	Re-evaluate the FOG program in Chapter 5.26 of the Municipal Code and develop potential updates which could lead to reduction of SSOs associated with FOG.

## 10 System Evaluation and Capacity Assurance Plan

### 10.1 Current Regulatory Requirements

To meet the requirements in Order No. 2006-0003-DWQ, the City shall prepare and implement a capital improvement plan (CIP) 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:

- (1) **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;
- (2) **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (1) above to establish appropriate design criteria;
- (3) **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding; and
- (4) **Schedule:** The City shall develop a schedule of completion dates for all portions of the capital improvement program developed in (1)-(3) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14 of the Order No. 2006-0003-DWQ.

### 10.2 Audit Findings

**Table 10-1** shows an evaluation of the findings in Section 8 “System Evaluation and Capacity Assurance Plan” of the 2009 SSMP.

**Table 10-1 – Evaluation of “System Evaluation and Capacity Assurance Plan” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “System Evaluation and Capacity Assurance Plan” section in the 2009 SSMP complies with the requirements in Order No. 2006-0003-DWQ.	The SSMP was effective since there have not been any SSOs related to insufficient hydraulic capacity of the key sewer system elements.	No recommended modification required.

## 11 Monitoring, Measurement, and Program Modifications

### 11.1 Current Regulatory Requirements

To meet the requirements in the Order No. 2006-0003-DWQ, the City shall:

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

### 11.2 Audit Findings

**Table 11-1** shows an evaluation of the findings in Section 9 “Monitoring, Measurement, and Program Modifications” of the 2009 SSMP.

**Table 11-1 – Evaluation of “Monitoring, Measurement, and Program Modifications” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “Monitoring, Measurement, and Program Modifications” section in the 2009 SSMP complies with the requirements in the Order No. 2006-0003-DWQ.	The City is making current updates that will make section more effective.	No recommended modification required.

## 12 Program Audits

### 12.1 Current Regulatory Requirements

As part of the SSMP, the City shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee’s compliance with the SSMP requirements identified in Order No. 2006-0003-DWQ including identification of any deficiencies in the SSMP and steps to correct them.

### 12.2 Audit Findings

**Table 12-1** shows an evaluation of the findings in Section 10 “SSMP Program Audits” of the 2009 SSMP.

**Table 12-1 – Evaluation of “SSMP Program Audits” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “SSMP Program Audits” section in the 2009 SSMP complies with the requirements in the Order No. 2006-0003-DWQ.	Although this section is in compliance, this section is not effective. The City has not prepared an SSMP internal audit since Order No. 2006-0003-DWQ has been adopted.	Complete SSMP Audits as required.

## 13 Communication Program

### 13.1 Current Regulatory Requirements

To meet the requirements in the Order No. 2006-0003-DWQ, the City shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the City as the program is developed and implemented.

The City shall also create a plan of communication with systems that are tributary and/or satellite to the City’s sanitary sewer system.

### 13.2 Audit Findings

**Table 13-1** shows an evaluation of the findings in Section 11 “Communication Program” of the 2009 SSMP.

**Table 13-1 – Evaluation of “Communication Program” Section in the 2009 SSMP**

Compliance	Level of Effectiveness	Recommended Corrective Actions
The “Communication Program” section in the 2009 SSMP complies with the requirements in the Order No. 2006-0003-DWQ.	The level of communication appears to have been sufficient.	No recommended modification required.

## 14 Operators' Input on Audit Findings

The City's operator staff and the utility line superintendent, Wayne Bogart, have reviewed the audit findings and conclude that the City needs to review the age of the pipes and create a lateral replacement program to reduce the number of SSOs. Due to the age of the sewer collection system, the City has experienced lateral failures in the older part of town. The City's employees allocated to manage the sewer collection system are understaffed and unable to keep up with the maintenance and closed-circuit television (CCTV) of the sewer system. The City is currently conducting a rate study to improve the City's sewer system which includes increasing the City's staff for routine maintenance and providing more CIPs for sewer main and lateral replacements.

## 15 Proposed Schedule

Under Order No. 2006-0003-DWQ, an internal program audit should be conducted at a minimum frequency of once every two years. Under the General Order 2022-0103-DWQ, the City shall conduct an internal program audit at a minimum frequency of once every three years. The audits are due within six months after the end of the 3-year Audit Period. The audit periods are established by the SWRCB based on the schedule requirements in Order No. 2006-003-DWQ and General Order 2022-0103-DWQ and are not based on the date that the last audit was completed. According to the SWRCB, the next audit should be completed by August 2, 2024.