

CITY OF NORWALK

Sewer System Management Plan

CITY OF NORWALK
Norwalk, California

APRIL 2009



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SEWER SYSTEM MANAGEMENT PLAN

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**CITY OF NORWALK
SEWER SYSTEM MANAGEMENT PLAN**

Certification

I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Delfino Consunji, P.E
City Engineer

Date

SECTION 1
INTRODUCTION

Provision 11 of State Water Resources Control Board Order No. 2006-0003 (Order), Statewide General Waste Discharge Requirements for Sanitary Sewer Systems sets the requirement for the preparation of a Sewer System Management Plan:

- 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.*

The essential elements of the SSMP are detailed in Provision 13 of the Order. The City of Norwalk's Sewer System Management Plan is documented in this report, which addresses each element listed in Provision 13 of the Order.

The City of Norwalk (City) is currently conducting a financial analysis of its Sewer Utility, and will establish a sewer fund and rate structure so that sufficient revenues can be generated for proper operation and maintenance of the collection system, and funding of the capital improvement projects recommended by the System Evaluation and Capacity Assurance Plan, and the Operation and Maintenance Program.

The following sections list each essential element of the Sewer System Management Plan, and describe how the City complied with each.

SECTION 2

GOALS

The Order requires the City to identify the goal of its Sewer System Management Plan. The City must provide a plan and schedule to properly manage, and maintain all parts of the sanitary sewer system.

Compliance:

The goals of the City of Norwalk's Sewer System Management Plan are to:

1. Prevent sewer system overflows by:
 - a. Providing adequate capacity in its system in accordance with its criteria, and schedule detailed in its System Evaluation and Capacity Assurance Plan
 - b. Cost effectively minimizing the sources of inflow and infiltration
 - c. Implementing its fats, oils, and grease (FOG) control program to minimize the entry of these substances into its collection system
 - d. Inspecting its system, assessing its condition, and replacing and/or rehabilitating it as detailed and scheduled in its Operation and Maintenance Program
 - e. Establishing and implementing an operation and maintenance program with adequately trained staff to not only prevent SSO's, but also to extend the useful life of its system
 - f. Establishing proper legal authority for implementing the above
 - g. Maintaining the necessary level of funding for providing proper operation, maintenance, and repair of its system as detailed in its Operation and Maintenance Program; and providing adequate capacity as detailed in its System Evaluation and Capacity Assurance Plan through periodic reviews of its rate structure.
2. Minimize the impact of SSO's that do occur by preparing a proper Overflow Emergency Response Plan, training its staff in its implementation, and implementing the plan when needed.

The City completed and certified its schedule on July 17, 2007, and has completed all other SSMP elements in accordance with this schedule.

SECTION 3
ORGANIZATION

The Order requires that the City identify:

- (a) The name of the responsible or authorized representative as described in Section J of this Order.*
- (b) The name 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*
- (c) 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)).*

Compliance:

The City completed and certified its Organization document on October 31, 2007.

(a) Legally Responsible Official

The City of Norwalk's Legally Responsible Official is the Public Services Director.

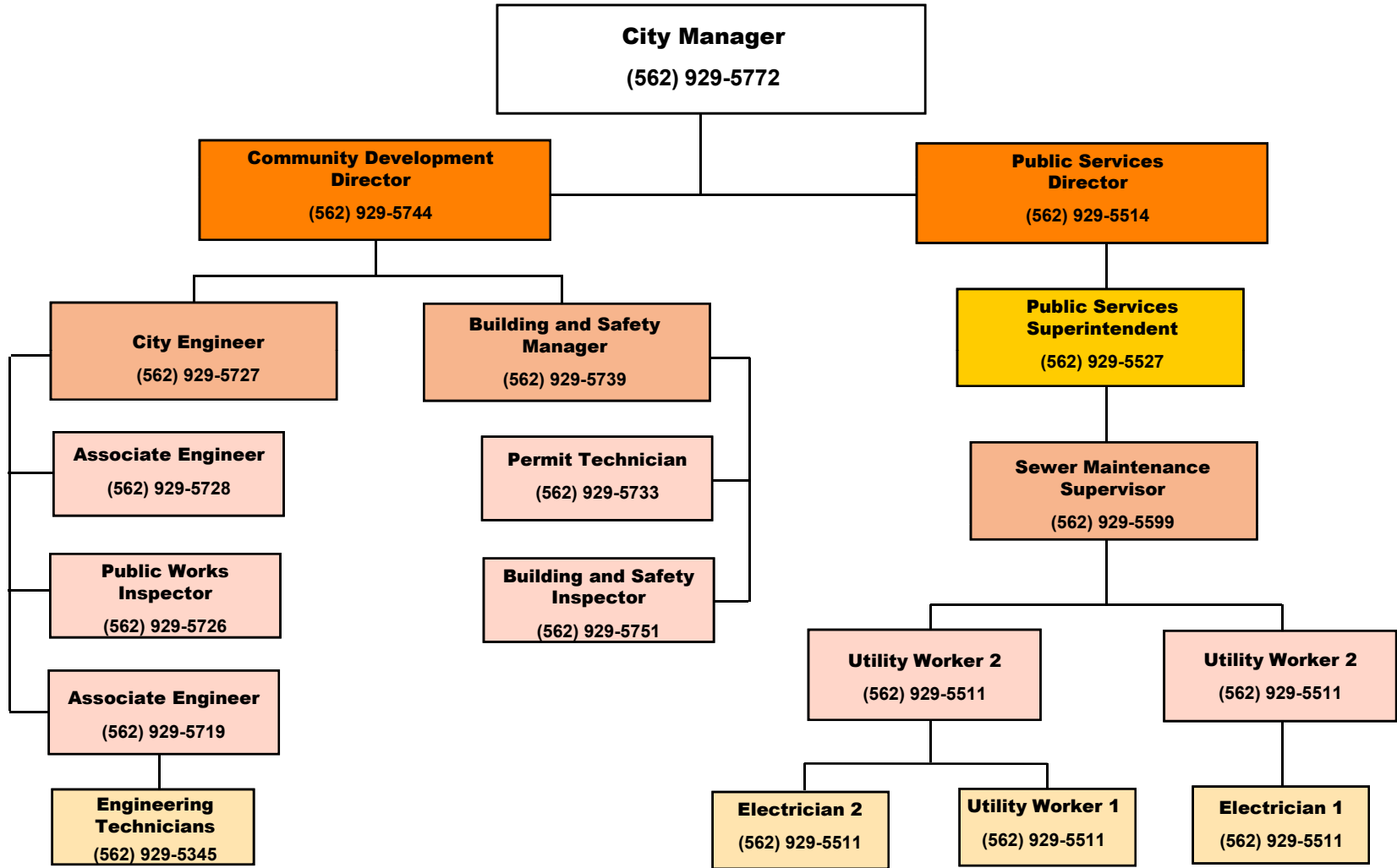
(b) Organization Chart and Explanation

The organization chart provided in the following page illustrates the lines of authority for City officials and staff responsible for implementing the SSMP measures. Specific responsibilities are described for each position as follows:

City Manager, (562) 929-5772

- Establishes policy
- Allocates resources
- Delegates responsibility
- Establishes the Organization responsible for implementing the specific measures in the SSMP
- Oversees the preparation of the sewer funding plan and rate structure for proper operation and maintenance of the collection system, and implementing the capital improvement program
- Oversees the development of Legal Authority

City of Norwalk Statewide WDR SSMP Implementation



Director of Community Development, (562) 929-5744

- Oversees the work of the Engineering staff related to SSMP

City Engineer, (562) 929-5727

- Establishes the Goals of the SSMP
- Oversees the preparation and updating of the System Evaluation and Capacity Assurance Plan, including:
 - Development of design criteria
 - Evaluation of hydraulic capacity of the gravity system and pump stations
 - Development of a short- and long-term capital improvement program to address the identified hydraulic deficiencies along with its schedule and sources of funding
- Participates in the preparation of Sewer System Rehabilitation Plan
- Oversees the preparation and maintenance of an up to date map of the collection system, pumping facilities, and the stormwater conveyance facilities
- Establishes an implementation plan and schedule for a public education outreach program that promotes proper disposal of fats, oils, and grease (FOG)
- Oversees the development and implementation of source control measures for all sources of FOG discharged to the system
- Participates in the preparation and implementation of the Emergency Overflow Response Plan
- Oversees the preparation of design and construction standards and specifications for the installation of new sewers, pump stations, and other appurtenances, and for rehabilitation and repair of the existing system
- Oversees the development of procedures and standards for inspection and testing the installation of new sewers, pump stations, and appurtenances, and for rehabilitation and repair of existing sewers
- Participates in the preparation of a sewer funding plan and rate structure
- Oversees the preparation of plans, specifications and estimates for the capital improvement projects, including rehabilitation and repair projects
- Participates in updating the SSMP elements based on monitoring and/or performance evaluations
- Oversees the periodic internal audits of the SSMP
- Oversees the communication program informing the public on the development, implementation, and performance of the SSMP

Engineering Staff

- Participates in the development of:
 - Emergency Overflow Response Plan
 - Preventive Maintenance Plan
 - Fats, Oils, and Grease Program
 - System Evaluation and Capacity Assurance Plan

- Sewer System Rehabilitation Plan
- Design and construction standards and specifications
- Procedures and standards for inspection and testing
- Construction inspection of new sewers and pump stations, and rehabilitation projects

Director of Public Services, (562) 929-5514

- Establishes policy
- Allocates resources
- Delegates responsibility
- Manages the FOG program
- Participates in the preparation of the funding plan and rate structure for proper operation and maintenance of the collection system, and implementing the capital improvement program

Public Services Superintendent, (562) 929-5527

- Oversees the preparation of the Sewer System Management Plan
- Participates in establishing the Organization responsible for implementing the specific measures in the SSMP
- Oversees the preparation and implementation of the routine preventive operation and maintenance of the system and equipment through the Public Services Department and contractors, including:
 - Regular cleaning of the system
 - Scheduled cleaning of known problem areas
 - Pump station maintenance
- Oversees the CCTV inspection and condition assessment of the system and identification of system sections subject to FOG blockages
- Oversees the preparation of the Operation and Maintenance Program
- Participates in the development of, and implements source control measures for all sources of FOG discharged to the system as identified above
- Oversees the development of the Sewer System Rehabilitation Plan with its prioritized short- and long-term capital improvement projects based on visual and CCTV inspections of the collection system, and visual inspection of pump stations
- Oversees the preparation of Emergency Overflow Response Plan
- Oversees the collection and maintenance of relevant information for establishing and prioritizing appropriate SSMP activities
- Oversees the illustration of SSO trends including frequency, location and volume
- Schedules training for staff in sanitary sewer system operations and maintenance
- Oversees the preparation and maintenance of equipment and replacement part inventories; identifies critical replacement parts
- Assesses the success of the Preventive Maintenance Program

- Participates in monitoring the implementation, and measuring the effectiveness of SSMP elements
- Participates in updating the SSMP elements based on monitoring and/or performance evaluations
- Participates in the periodic SSMP program audits

Utilities/Sewer Maintenance Supervisor, (562) 929-5599

- Participates in:
 - Implementing the routine preventive operation and maintenance of the system and equipment
 - The CCTV inspection and condition assessment
 - The preparation of a plan and schedule for the disposal of FOG generated within the sanitary sewer system service area
 - The development of, and implements, source control measures for all sources of FOG discharged to the system
 - The Sewer System Rehabilitation Plan
 - The Emergency Overflow Response Plan
 - The collection and maintenance of relevant information for establishing and prioritizing appropriate SSMP activities
 - The illustration of SSO trends including frequency, location and volume
 - Scheduling training for staff in sanitary sewer system operations and maintenance
 - The preparation and maintenance of equipment and replacement part inventories; identification of critical replacement parts
 - Assessing the success of the preventive maintenance program
 - Monitoring the implementation, and measuring the effectiveness of SSMP elements
 - Updating the SSMP elements based on monitoring and/or performance evaluations
 - The periodic SSMP program audits
 - Reports SSOs

Maintenance Workers

- Participate in:
 - Routine preventive operation and maintenance work along with contractors
 - The CCTV inspection and condition assessment
 - The collection and maintenance of relevant information for establishing and prioritizing appropriate SSMP activities
 - The illustration of SSO trends including frequency, location and volume
 - Training in sanitary sewer system operations and maintenance

- The preparation and maintenance of equipment and replacement part inventories; identifies critical replacement parts
- The implementation of the Emergency Overflow Response Plan in response to SSOs

Building and Safety Manager

- Oversees the implementation of the Fats, Oils, and Grease (FOG) Program, including inspection of FOG producing facilities, and enforcement of the FOG Ordinance

(C) The chain of communication for reporting SSOs

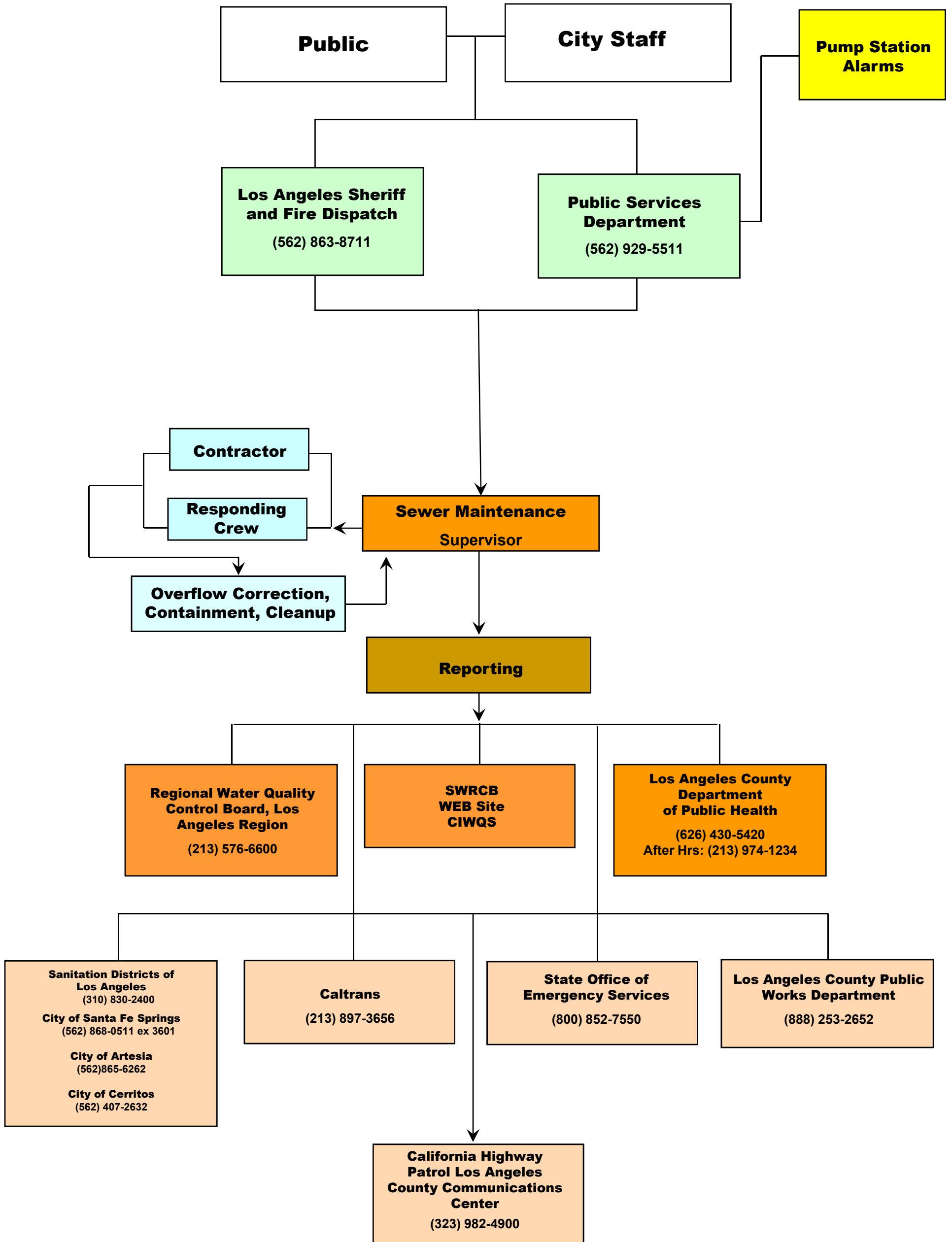
Detailed procedure for responding to an SSO is contained in the City of Norwalk's Sanitary Sewer Overflow Emergency Response Plan that was completed and certified on October 30, 2008.

The Order requires that all sanitary sewer overflows “that potentially affect public health or reach the waters of the State in accordance with the Monitoring and Reporting Program” be reported to appropriate regulatory agencies and other potentially affected entities, such as health agencies, Regional Water Quality Control Boards, water suppliers, etc.

The SSO Reporting Chart included on the next page illustrates the chain of communication for reporting SSOs from receipt of an SSO notification. The SSO reports are prepared by the **Responsible Staff Person and/or the Contractor** who responds to the SSO. The final report is reviewed by the **Utilities/Sewer Maintenance Supervisor**, who submits it to the appropriate agencies.

The overflow will be reported on the Sanitary Sewer Overflow Report Form, which is included in the Overflow Emergency Response Plan and requires the same information that will need to be entered into the Online SSO Database through California Integrated Water Quality System (CIWQS).

City of Norwalk Statewide WDR – SSMP Sanitary Sewer Overflow Reporting



SECTION 4

LEGAL AUTHORITY

The Order requires that:

Each Enrollee must demonstrate, through sanitary sewer system use ordinance, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- (a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, stormwater, chemical dumping, unauthorized debris and cut roots, etc);*
- (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 Public Agency;*
- (d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and*
- (e) Enforce any violation of its sewer ordinance.*

The Order prohibits any SSO that results in a discharge of untreated or partially treated wastewater to the waters of the United States or that creates a nuisance as defined in California Water Code Section 13050(m).

Legal Authority is a very important component of a sewage collection agency's responsibility in regulating the usage of the sanitary sewer system.

Compliance:

The City has established legal authority by:

- Adopting the Los Angeles County Code, Division 2 of Title 20, Sanitary Sewer and Industrial Waste Ordinance. Title 20 references Title 28 which includes the adoption of the 2007 California Plumbing Code.
- Adopting the City of Norwalk Municipal Code Title 13 Public Services Chapter 12
- Developing its Standard Drawings for Construction of Sanitary Sewers
- Developing Design Standards for Sewer Facilities
- Adopting a Fats, Oil and Grease Program

The City completed and certified its Legal Authority document on October 29, 2008.

SECTION 5

OPERATION AND MAINTENANCE PROGRAM

The Order requires that:

The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system

- (a) 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.*
- (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.*
- (e) Provide equipment and replacement part inventories, including identification of critical replacement parts.*

Compliance:

The City completed and certified its Operation and Maintenance Program document on October 30, 2008.

- (a) The City has developed a GIS map of its sanitary sewer system, showing all sewer facilities and stormwater conveyance facilities. It is included in the Operation and Maintenance Program document as well as the Overflow Emergency Response Plan.
- (b) The City performs routine operation and maintenance activities in order to provide a high level of service to its customers, extend the useful life of its assets, and prevent overflows. These activities are described in the Operation and Maintenance Program document and include a cleaning program, a CCTV inspection program, pump station maintenance, equipment maintenance, and repair and replacement. The City's entire

sewer collection lines are cleaned every two years and frequent maintenance areas are cleaned once every 180 days or twice per year. Pump stations are inspected twice weekly.

- (c) The City has completed CCTV inspection of approximately 100,154 feet or 12.6 percent of the gravity system. The condition of the inspected system was evaluated to identify the structural deficiencies, as well as operation and maintenance deficiencies. The structural deficiencies have been prioritized and a structural replacement and rehabilitation program has been developed.

The City is currently conducting a financial analysis of its Sewer Utility, and will establish a sewer fund and rate structure so that sufficient revenues can be generated for proper operation and maintenance of the collection system, and funding of the capital improvement projects recommended by the Capacity Assurance Plan and the Operation and Maintenance Program. Funds will also support the continuation of the CCTV inspection plan. The City plans to complete the inspection of the entire sewer system within the next 10 years.

- (d) Currently, the City maintenance staff receives on the job training that includes training for safety, lockout-tag out, traffic control, confined space entry, and driver safety. In the future, the City intends to supplement this training with the California Water Environment Association's (CWEA) training program.

The City will require contract staff and contractor staff who will perform flow monitoring, CCTV inspection, maintenance, repair, or replacement on the collection system, including the pump stations and force mains, to possess adequate level of training and certifications appropriate for their duties.

- (e) The City has an up-to-date equipment and replacement parts inventory list included in the Operation and Maintenance Program document.

SECTION 6

DESIGN AND PERFORMANCE PROVISIONS

The Order requires that the City has:

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

Compliance:

(a) The City has adopted:

- Sewer Standard Plans
- Standard Plans (Sewer) for Public Works Construction (latest edition)
- The Los Angeles County Code, Division 2 of Title 20, Sanitary Sewer and Industrial Waste Ordinance. Title 20 references Title 28 which includes the adoption of the 2007 California Plumbing Code.
- Los Angeles County Sanitation District Standard Drawings

The City has also developed its own Design Standards for Sewer Facilities document.

(b) The City has adopted:

- The Los Angeles County Code, Division 2 of Title 20, Sanitary Sewer and Industrial Waste Ordinance. Title 20 references Title 28 which includes the adoption of the 2007 California Plumbing Code.

The City has also developed its own Design Standards for Sewer Facilities document.

Project specific plans and technical specifications are required for each project, which are prepared by California Registered Civil Engineers. Testing and inspection requirements are detailed in the project specifications, in addition to the City's Design Standards for Sewer Facilities.

SECTION 7

OVERFLOW EMERGENCY RESPONSE PLAN

The Order requires that at a minimum Overflow Response Plan must include:

- (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 appropriate response to all overflows;*
- (c) *Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially effected 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 MRP (Monitoring and Reporting Program). 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 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 wastewaters 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 the impact of the discharge.*

Compliance:

The City completed and certified its Overflow Emergency Response Plan document on October 30, 2008.

Staff training in the established procedures will be conducted at least once per year.

SECTION 8

FATS, OILS, AND GREASE CONTROL PROGRAM

The Order requires:

Each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee 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:

- (a) An implementation program and schedule for a public education outreach program that promotes proper disposal of FOG;*
- (b) A plan and a 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 traps 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 identified in (F) above.*

Compliance:

The City complied with this requirement by:

- Establishing legal authority through adopting Division 2, Sanitary Sewers and Industrial Waste, of Title 20 of the Los Angeles County Code, and all corresponding amendments.
- Preparing a Fats, Oils, and Grease Control Program.
- Identifying sections of the sewer system subject to grease blockages and including these sections in its Hot Spot cleaning program

The City completed and certified its FOG Control Program on October 30, 2008.

SECTION 9

SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

The Order requires:

The Enrollee 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:

- (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 the 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, under take the evaluation identified in (a) above to establish appropriate design criteria; and*
- (c) **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.*
- (d) **Schedule:** The enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (A)-(C) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D.14.*

Compliance:

The City complied with this requirement by developing a hydraulic model of the entire sewer system and preparing its System Evaluation and Capacity Assurance Plan (SECAP). The SECAP Plan will be updated as additional information is developed.

The SECAP includes a capital improvement program with an implementation cost of \$1,724,000 (April 2009 dollars) to eliminate the capacity deficiencies in the existing system. It identifies future capacity deficiencies due to upcoming development with an estimated implementation cost of \$1,115,000 (April 2009 dollars).

The City of Norwalk (City) is currently conducting a financial analysis of its Sewer Utility, and will establish a sewer fund and rate structure so that sufficient revenues can be generated for proper operation and maintenance of the collection system, and funding of the capital improvement projects recommended by the Capacity Assurance Plan and the Operation and Maintenance Program.

All future sewer system design and construction work shall conform with the City of Norwalk Design Standards for Sewer Facilities, the Los Angeles County Code, Division 2 of Title 20, Sanitary Sewer and Industrial Waste Ordinance, and the standard plans discussed in Section 6 (Design and Performance Provisions).

SECTION 10

MONITORING, MEASUREMENT AND PROGRAM MODIFICATIONS

The Order requires:

- (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.*

Compliance:

The City will monitor the effectiveness of its program continuously in order to minimize the possibility of SSO's. Where appropriate, the City may:

- Adjust its Hot Spot cleaning program
- Revise its criteria
- Expand the scope of its FOG Program
- Modify its design and construction standards
- Revise its Capital Improvement Program
- Adjust its rate structure

SECTION 11

SSMP PROGRAM AUDITS

The Order requires:

As part of the SSMP, the Enrollee 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 this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

Compliance:

The City will audit its Sewer System Management Plan bi-annually in the month of July, (starting in 2011) identify any deficiencies, and make appropriate adjustments. The audit will examine the following:

- Whether any spill occurred from its system
- Cause of the spill
- Steps needed to be added to the SSMP to prevent re-occurrence
- Capital improvement projects that have been implemented
- Next year's capital improvement program

The SSMP audit will be completed by City staff as directed by the City Engineer.

SECTION 12
COMMUNICATIONS

The Order requires that:

The Enrollee 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 Enrollee as the program is developed and implemented.

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

Compliance:

The City will communicate on a regular basis with interested parties on the implementation and performance of its Sewer System Management Plan.

The City will place the SSMP related documents on its Web site, allowing interested parties easy access to the program.

