Sewer System Management Plan (SSMP)

2026 Update

Sanitary Sewer Collection System

Waste Discharge ID (WDID): #9SSO10681

PAUMA VALLEY

COMMUNITY SERVICES DISTRICT

REVIEWED AND APPROVED BY:

Eric Steinlicht

Eric Steinlicht
Legally Responsible Official
Pauma Valley Community Services District
Sanitary Sewer System Waste Discharge ID #9SSO10681

PREPARED BY:

FISCHER COMPLIANCE LLC
PRACTICES THAT COMPLY

July 28, 2026

Date Signed

THIS PAGE INTENTIONALLY LEFT BLANK

SSMP Action Items Checklist (Implementation Plans and Schedules)

The purpose of this table is to track and document the SSMP Implementation Plans and Schedules for each Element. Additional details are found in the discussions within each section of the SSMP. Abbreviations and acronyms are found on page vi.

PLAN	SCHEDULE	RESPONSIBLE STAFF
1.2 SSMP Update Schedule		
Prepare for next SSMP Audit	Begin 5/2/2027	LRO
Complete and upload the SSMP audit.	By 11/2/2027	LRO
Incorporate Audit Findings, update Change Log, and update SSMP	5/2/2026	LRO
Board Approval and LRO Certification of SSMP Updates	First update (by 8/2/2026) and next update (by 8/2/2032)	LRO
1.3 Sewer System Asset Overview		
Review District-owned asset statistics and element description; update as necessary	At the beginning of the audit cycle, and when significant changes have been made.	LRO
2. Organization		
Review names, contact information, and position responsibilities; update as necessary.	Semi-As needed	LRO
Review Chain of Communication outcomes for all spill responses	Each Spill Event	LRO
Review the Organizational Chart for any changes; update as necessary.	Semi-As needed	LRO
3. Legal Authority		
Review Ordinance(s) to confirm that all documents provide the necessary required legal authority.	Once per 6-year SSMP Update Cycle	LRO
Confer with storm drain owners to ensure current practices and contact information are up to date.	As needed	LRO
Monitor and document occasions when Ordinance(s) failed to address issues as intended.	Continuously	LRO
4.1 Updated Map of Sewer System		
Review map update procedures with all affected staff.	As needed	LRO
Review/ensure all newly installed facilities have been updated and included in the system maps	As needed	LRO

PLAN	SCHEDULE	RESPONSIBLE STAFF
4.2 Preventive Operation and Maintenance Activities		
Monitor "Past Due" work orders to ensure critical work is being completed	As needed	LRO
Review scheduled PMs to ensure the prescribed schedule remains appropriate.	As needed	LRO
4.3 Training		
Review training documentation to ensure all staff have received the required training	As needed	LRO
Review agreements with contractors and/or pre-job meeting minutes to ensure contract personnel have received instruction for responding to sewage spills	Each Contract	LRO
4.4 Equipment Inventory		
Audit inventory lists to ensure stock is adequate	As needed	LRO
Check with vendors to ensure lead times for critical parts are as expected.	As needed	LRO
Ensure contracts with emergency support services are current	As needed	LRO
5.1 Updated Design Criteria/Construction Standards/Specifications		
Ensure all project plans are approved in accordance with the District's Standard Specifications and Details.	Each Project	LRO
Verify design standards and hydraulic model previously completed are adequate and consistent with current standards of practice.	2025	LRO
5.2 Procedures and Standards		
Verify inspection procedures are adequate and consistent with current standards of practice	2017 (10-year cycle)	LRO
Verify design standards and hydraulic model previously completed are adequate and consistent with current standards of practice.	2017 (10-year cycle)	LRO
6. Spill Emergency Response Plan		
Perform SERP training, including practice drills.	As needed	LRO
Review Post Spill Assessments to ensure adherence with the SERP and to identify any trends that should be addressed.	As needed	LRO

PLAN	SCHEDULE	RESPONSIBLE STAFF
7. Sewer Pipe Blockage Program		
Review/evaluate enforcement and inspection findings and implement changes as necessary.	As needed	LRO
Review spill rates and causes and make changes to maintenance programs, as necessary.	As needed	LRO
8.1 System Evaluation and Condition Assessment		
Review/evaluate enforcement and inspection findings and implement changes as necessary.	As needed	LRO
Review spill rates and causes and make changes to maintenance programs, as necessary.	As needed	LRO
Hold meetings to discuss any issues that may result from climate change.	As needed	LRO
8.2 Capacity Assessment and Design Criteria		
Monitor/evaluate significant rain events to see if they exceed the design storm in the hydraulic model.	Each significant rain event	LRO
Identify and monitor flood-prone areas susceptible to erosion from rain events	After each significant rain event	LRO
Monitor flows in each basin and update the hydraulic model	Per the LRO's schedule	LRO
8.3 Prioritization of Corrective Action		
Utilize all available data for prioritizing corrective actions, considering the severity and consequences of potential spills.	Each CIP Update	LRO
Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities.	Continuously	LRO
8.4 Capital Improvement Plan		
Hold regular coordination meetings with all parties to help keep the projects on track and resolve issues that may arise in a timely manner.	As needed	LRO
For schedules that are not followed, justify and document the reason.	Each Delayed Project	LRO
9. Monitoring, Measurement, and Program Modifications		
Assess work programs to ensure outcomes are as intended.	As needed	LRO
Prepare updates to work programs and the SSMP based on assessments.	As Needed	LRO
Monitor and evaluate spill trends. Document efforts.	As needed	LRO

PLAN	SCHEDULE	RESPONSIBLE STAFF
10. Internal Audits		
Schedule audits in advance of due dates to ensure adequate time to complete. The District has 6 months to complete the audit from the end of the audit period.	Beginning at the end of the audit period	LRO
Ensure a plan and schedule are developed to address deficiencies.	Once the Audit is completed	LRO
11. Communication Program		
Ensure the Board of Directors approves the SSMP per schedule.	Every 6 years	LRO
Ensure the SSMP is posted on the District website and the link functions properly.	As needed	LRO
Ensure Sewage Spill Warning signs are readily available to communicate with the public when necessary	As needed	LRO

SSMP Change Log of Revisions and Completed Action Items[1]

Revision Date	SSMP Section	Approval Date	Description of Change/Revision/Activity	Initials

Table 1 – SSMP Change Log of Revisions and Completed Action Items

[1] *Use this Change Log to document any edits/changes or action items as they are identified and document when they are completed. To add additional table rows, insert your curser into the bottom right cell of the table and hit the tab button. The table will continue on the next page.*

Abbreviations and Acronyms[2]

Abbreviation/Acronym	Complete Description
DARWA	District Area Regional Wastewater Agency
BMP	Best Management Practices
CCTV	Closed Circuit Television
CIP	Capital Improvement Program
CIPP	Cured-in-Place Pipe
CIWQS	California Integrated Water Quality System (State Water Board Online Spill Database)
CMMS	Computerized Maintenance Management System
LRO	District Chief Plant Operator
CSD	Community Services District
EPA	US Environmental Protection Agency
FOG	Fats, Oils, and Grease
FSE	Food Service Establishment
GIS	Geographic Information System
I & I	Inflow and Infiltration
KPI	Key Performance Indicator
LRO	Legally Responsible Official
MRP	Monitoring and Reporting Program
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
RWQCB	Regional Water Quality Control Board
SCADA	Supervisory Control and Data Acquisition
SERP	Spill Emergency Response Plan
SOP	Standard Operating Procedure
SSMP	Sewer System Management Plan
Spill	Sanitary Sewer Spill
SWRCB	State Water Resources Control Board
WDID	Waste Discharge ID Number (CIWQS)
WDR	Sanitary Sewer Systems General Wastewater Discharge Requirements Order issued by the State Water Board (Order No. 2022-0103-DWQ)

Table 2 – Abbreviations and Acronyms

[2] *For a full list of related WDR terms, see the WDR, Attachment A (page 32)*

Pauma Valley Community Services District
Attn: Eric Steinlicht, General Manager
Legally Responsible Official (LRO)

Dear Eric,

We are pleased to present the new 2026 Sewer System Management Plan (SSMP) Update developed in partnership with the Pauma Valley Community Services District management. The 2026 Update meets and exceeds compliance with the Reissued WDR (State Water Board, Water Quality Order No. 2022-0103-DWQ, Attachment D-10 and Specifications 5.4). The 2026 SSMP has been completely revised to harmonize with industry standard guidelines and incorporates the latest SSMP Audit findings.

The 2026 SSMP is a declaration of what the District is doing to demonstrate full compliance with the Reissued WDR. Attachment A of the Reissued WDR (page A-4) states, “A sewer system management plan is a living document an Enrollee develops and implements to effectively manage its sanitary sewer system(s) in accordance with this General Order”. This requires the District to periodically review and update the SSMP as necessary until its next required 6-year SSMP Update is completed.

To support these ongoing review and update requirements, this document includes a sample change log that may be used as a reference if a system is not already in place. We anticipate the District utilizing this SSMP, incorporating management of its additional sewer system.

We look forward to assisting the District wherever necessary to fully implement the new 2026 SSMP Update.

Sincerely,

Jim Fischer

James Fischer, P.E.
Principal, Fischer Compliance LLC
Credentialed U.S. EPA NPDES Compliance Inspector

TABLE OF CONTENTS

SSMP Action Items Checklist (Implementation Plans and Schedules) i
SSMP Change Log of Revisions and Completed Action Items v
Abbreviations and Acronyms vi

INTRODUCTION 1
SSMP Organization 3

1. GOAL AND INTRODUCTION 4
1.1. Regulatory Context 4
1.2. SSMP Update Schedule 5
1.3. Sewer System Asset Overview 7
Specifications 5.2 – SSMP Development and Implementation 10
Specifications 5.7 – Allocation of Resources 11
Provisions 6.1 – Enforcement Provisions 12
Provisions 6.3 – Sewer System Management Plan Availability 13

2. ORGANIZATION 14
2.1. Organizational Chart 17
2.2. Organizational Staffing Responsibilities 18
2.3. Chain of Communication for Reporting Spills 19

3. LEGAL AUTHORITY 21

4. OPERATION AND MAINTENANCE PROGRAM 23
4.1. Updated Map of Sewer System 23
4.2. Preventive Operation and Maintenance Activities 24
4.3. Training 26
4.4. Equipment Inventory 28
Specifications 5.19 – Operations and Maintenance 29

5. DESIGN AND PERFORMANCE PROVISIONS 31
5.1. Updated Design Criteria/Construction Standards/Specifications 31
5.2. Procedures and Standards 32

6. SPILL EMERGENCY RESPONSE PLAN 33

7. SEWER PIPE BLOCKAGE PROGRAM 35

8. SYSTEM EVALUATION, CAPACITY ASSURANCE, CAPITAL IMPROVEMENTS 38
8.1. System Evaluation and Condition Assessment 38
8.2. Capacity Assessment and Design Criteria 41
8.3. Prioritization of Corrective Action 43
8.4. Capital Improvement Plan 44

9. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS 46

10. INTERNAL AUDITS 48

11. COMMUNICATION PROGRAM 50

LIST OF APPENDICES 52

REFERENCES 53

LIST OF FIGURES

Figure 1 – Collection System Operational Report – SWRCB CIWQS 2
Figure 2 – District Sewer System Management Plan, Subsequent Updates and Audit Due Dates. 5
Figure 3 – District Sewer Map 8
Figure 4 – District Organizational Chart 17
Figure 5 – Chain of Communication for Reporting Spills 19

LIST OF TABLES

Table 1 – SSMP Change Log of Revisions and Completed Action Items v
Table 2 – Abbreviations and Acronyms vi
Table 3 – District Sewer Connection Flow Classifications and Connections Data 8
Table 4 – District Implementation Responsibilities 15
Table 5 – District SSMP Responsible Position Contact Information 16
Table 6 – District Organization Positions and Responsibilities 18

Introduction

This Sewer System Management Plan (SSMP) or "Plan" has been prepared for the Pauma Valley Community Services District (District) with technical assistance from Fischer Compliance, LLC, for meeting and exceeding compliance with the State Water Resources Control Board's 2022 General Waste Discharge Requirements, Order WQ 2022-0103-DWQ for Sanitary Sewer Systems (Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D, 2022) (referred to throughout this document as the WDR). The District provided all details, information, and institutional insights for the preparation of the SSMP.

The document has been developed to meet the size, scale, and complexity, serving as a "living document" for managing and operating the District's sanitary sewer collection system. Additionally, the latest 2024 Sewer System Management Plan Guidance Manual (Bay Area Clean Water Agency (BACWA), 2024) published by the Bay Area Clean Water District (BACWA) was used as a model for developing the document to harmonize formatting/content and incorporate recommended guidance wherever possible.

The District's commitment to meeting or exceeding regulatory requirements, along with its proactive approach to operating and managing the collection system, has served it well, as evidenced by system performance relative to other agencies in the region and the state.

This SSMP reflects the ongoing day-to-day activities of the District for the management, operation, maintenance, and funding of the District's sanitary collection system. As such, this SSMP is a living document subject to constant review and revision as conditions and needs of the collection system change. This SSMP relies on numerous supporting documents, which are also subject to change, and which form the basis for how the District performs operation and maintenance of the collection system. The most current version of the SSMP, which may be updated at any time, will be posted on the District's website.

Before finalizing this SSMP, the District will incorporate additional information and details into the document and obtain approval from the District Board of Directors before uploading this publication to CIWQS.

Figure 1 – Collection System Operational Report – SWRCB CIWQS (below) provides key District spill metrics, including data comparing the District's spill record with state and regional system data from 2010 to 2026. The District consistently performs better than the statewide and regional spill rate indices and net spill volumes for all categories of spills from its sanitary sewer collection system.

SEARCH CRITERIA: [REFINE SEARCH] [NEW SEARCH] [GLOSSARY]
Date Range: Start_Date (**01/01/2010**) End_Date (**07/20/2026**)

DRILLDOWN HISTORY: [GO BACK TO LISTING OF COLLECTION SYSTEMS]
Pauma Valley Treatment Plant CS
Agency: Pauma Valley Community Services District

General Information

Region	Place ID	Place Name	CS Category	Place Address	Place County
9	631579	Pauma Valley Treatment Plant CS	Other	33129 Cole Grade Road Pauma Valley CA 92061	San Diego

Collection System Spill Summary

Operational Indices: Pauma Valley Treatment Plant CS

Spill Rate Indice (spills/100mi/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Pauma Valley Treatment Plant CS	0.0	0.0	0.0	0.75	0.0	0.75	0.0
State Other Average	1.5	2.85	0.78	2.04	1.56	5.89	1.47
Region (N/A)	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Net Volume Spills Indice (gallons/1000 Capita/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Pauma Valley Treatment Plant CS	0.0	0.0	0.0	109.54	0.0	0.0	0.0
State Other Average	517.86	0.2	343.0	519.86	1208.48	11.34	52.33
Region (N/A)	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Figure 1 – Collection System Operational Report – SWRCB CIWQS

SSMP Organization

This SSMP is organized into 11 core elements following Attachment D of the WDR, with inclusion of applicable Specifications requirements.

Each element in the SSMP includes the following technical contents.

1. Requirements – Provides the actual description of applicable requirements in the WDR.
2. Compliance – Describes the District's approach to complying with the WDR requirements.
3. Effectiveness – As measured by Key Performance Indicators (KPIs)
4. Implementation – Demonstrates how the District will ensure the SSMP will be carried out as described.
5. Resilience – Demonstrates the resilience that is addressed in the SSMP and built into the District's collection system and procedures.
6. Appendix Inclusions – List the items included in the Appendix for each SSMP Element, if any.

1. Goal and Introduction

WDR REQUIREMENTS

(Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D, 2022, pp. Attachment D-1 (pg. D-2))

> *"The goal of the Sewer System Management Plan (Plan) is to provide a plan and schedule to: (1) properly manage, operate, and maintain all parts of the Enrollee's sanitary sewer system(s), (2) reduce and prevent spills, and (3) contain and mitigate spills that do occur.*
>
> *The Plan must include a narrative Introduction section that discusses the following items:"*

1.1. Regulatory Context

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-1.1; pg. D-2)

> *"The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates".*

COMPLIANCE

The District maintains the local sanitary sewer system and is committed to protecting the public's health and the environment. Federal and State Water Quality regulations require agencies to maintain a comprehensive Sewer System Management Plan (SSMP) to prevent sewage spills.

The District is committed to fully implementing the 2022 WDR, including addressing all requirements by integrating a wide range of programs designed to ensure the integrity and efficiency of the District's sanitary sewer collection system. Moreover, the District is dedicated to maintaining its collection system systematically by implementing various work programs that focus on critical areas to prevent spills and enable a comprehensive approach to maintenance. Work programs include CCTV inspections, pipe cleaning, manhole inspections, lift station maintenance, source control, 24/7 roving security patrol services, and pipe repair, to name a few. Work programs are described in more detail in Section 4. "Operation and Maintenance Program" of this SSMP.

By prioritizing proactive measures and taking a comprehensive approach, the District is well-equipped and has a proven track record of effectively operating its sanitary sewer collection system at the highest levels of service, complying with the WDR, and reducing/eliminating sewage spills.

EFFECTIVENESS

N/A

IMPLEMENTATION PLAN/SCHEDULE

N/A

1.2. SSMP Update Schedule

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-1.2; pg. D-2)

> *"The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of sewer spills."*

COMPLIANCE

The District utilizes the *State Water Resources Control Board Lookup Tool*[3] to ensure compliance with all required due dates for updating its SSMP and completing its required SSMP Audits (see Figure 2 – District Sewer System Management Plan, Subsequent Updates and Audit Due Dates., below).

The District's most recent SSMP audit was completed for the period from May 2022 through May 2025 (see Appendix 10.1).

Sewer System Management Plan & Audit Required Due Dates
Transition from General Order 2006-0003-DWQ to Reissued General Order

Search by Waste Discharge Identification (WDID) Number

Enter your Waste Discharge Identification (WDID) number in the search field to retrieve the required Sewer System Management Plan (SSMP) Update and Audit due dates for your system.

9SSO10681

Show Update/Audit Dates

Sewer System Management Plan & Subsequent Update Due Dates

System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
Pauma Valley Treatment Plant CS	9SSO10681	8/2/2010	8/2/2015	8/2/2020	8/2/2026

Audit Due Dates

System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
Pauma Valley Treatment Plant CS	9SSO10681	8/2/2012	8/2/2014	8/2/2016	8/2/2018	8/2/2020	8/2/2022	8/2/2025

* Per Section 5.5 and Attachment E1, Section 3.11 of the General Order, Plan updates are due within six years after the required due date of the Enrollee's last Plan Update.

** Per Section 5.4 and Attachment E1, Section 3.10 of the General Order, the Audit Report is due within six months after the end of the required 3-year audit period.

Figure 2 – District Sewer System Management Plan, Subsequent Updates and Audit Due Dates.

[3] *State Water Resources Control Board Lookup Tool: https://www.waterboards.ca.gov/water_issues/programs/sso/lookup/*

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Are SSMP Audits and SSMP Updates being performed as scheduled?
- Has the SSMP been approved by the governing board on the required schedule (i.e., every six years)?
- Are specific internally established sewer program milestones being monitored?

IMPLEMENTATION PLAN/SCHEDULE

See "1.2 SSMP Update Schedule“ in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

1.3. Sewer System Asset Overview

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-1.3 (pg. D-3)

"The Plan Introduction section must provide a description of the Enrollee-owned assets and service area, including but not limited to:

- *Location, including county(ies);*
- *Service area boundary;*
- *Population and community served;*
- *System size, including total information in miles, information of gravity mainlines, information of pressurized (force) mains, and number of pump stations and siphons;*
- *Structures diverting stormwater to the sewer system;*
- *Data management systems;*
- *Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals;*
- *Estimated number or percentage of residential, commercial, and industrial service connections; and*
- *Unique service boundary conditions and challenge(s).*

Additionally, the Plan Introduction section must provide reference to the Enrollee's up-to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment".

COMPLIANCE

The District is located in San Diego County.

The District is located in an unincorporated area and originally developed in the 1960s with approximately 60 percent of the existing sanitary sewer system installed between the 1960s and 1980s. The District provides wastewater collection, treatment and disposal services to approximately 408 residential properties, as well as a country club, school, and a small number of agricultural users within its 1,445 acres, as shown in Figure ES-1. Sewage is conveyed to the District's wastewater treatment plant, located southeast of the corner of Spring Valley Road and Cole Grade Road.

The District's wastewater collection system includes approximately 8.2 miles of pipeline, 7.85 miles of gravity sewer and 0.35 miles of force main pipeline, as well as three lift stations. In 2020, the District's system conveys approximately 45,000 gallons per day of average dry weather flow to the District's wastewater treatment plant. The sewer collection system has no stormwater diversion structures.

The District has an updated sewer maps in GIS (see Figure 3 below).

The District does not own or maintain sewer service laterals or have any unique challenges for operating the collection system.

Estimated customer connection flow classifications and connection data are presented in Table 3, below, for residential, commercial, industrial, and institutional data.

Use Type	Number or % of Connections
Residential	< 95%
Commercial	~ 5%
Industrial/Institutional	None

Table 3 – District Sewer Connection Flow Classifications and Connections Data

The District's service area (satellite photo/map) is shown in Figure 3 below.

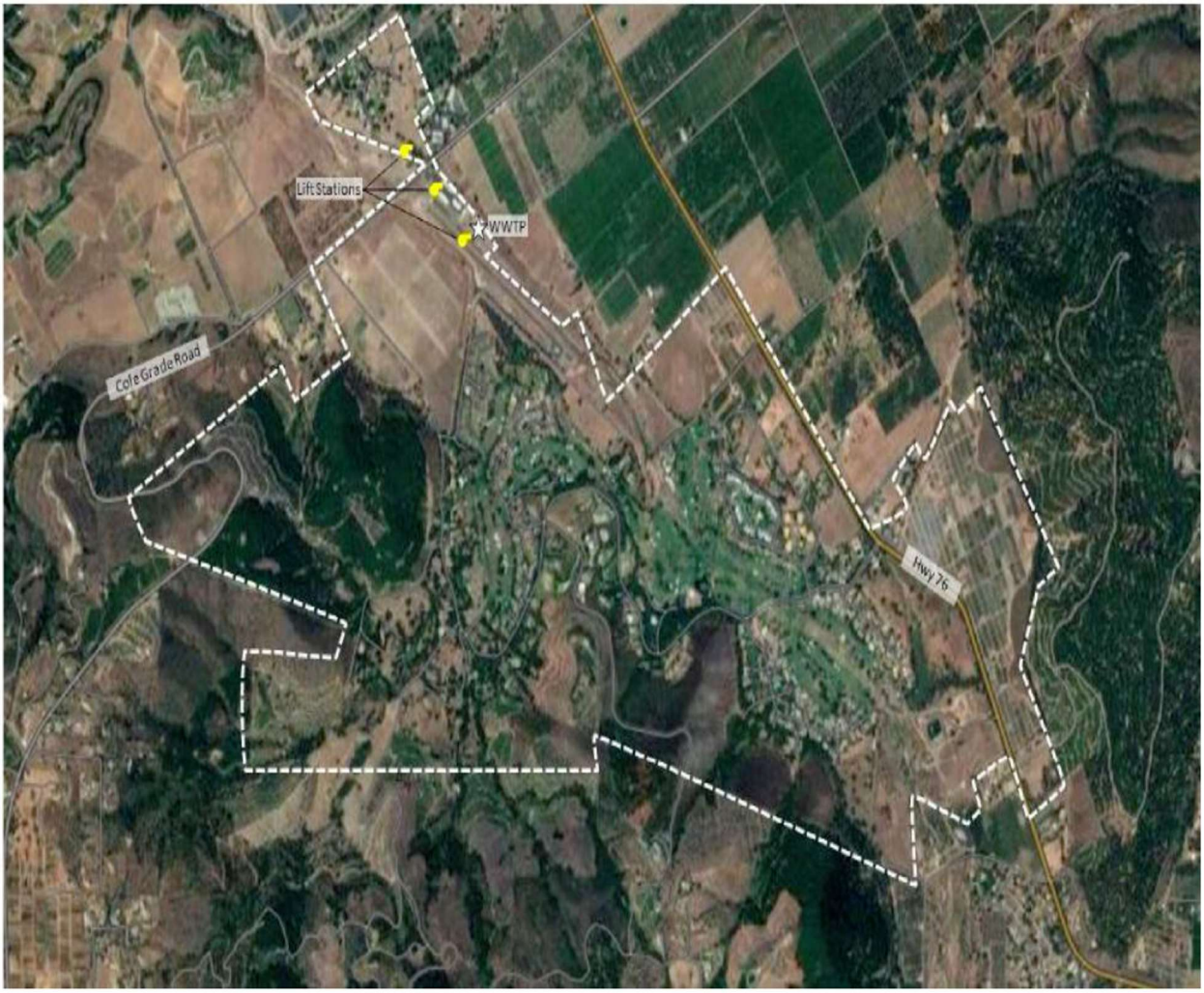

Figure 3 – District Sewer Map

Overall, the District is in a good position to maintain its collection system and has no operational or maintenance issues within its service area. The District maintains up-to-date system maps. The District does not own or maintain sewer service laterals as of 05/27/2025 via District Ordinance Number Fifty-Four (54).

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Are asset statistics periodically reviewed and updated as necessary?
- Are omissions or errors addressed promptly?
- Are system maps up to date?

IMPLEMENTATION PLAN/SCHEDULE

See "1.3 Sewer System Asset Overview" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 1 by:

- Adhering to an SOP for collecting and managing asset data.
- Redundancy: More than one member of staff is trained and able to retrieve and manage the data.
- Implementing a QA/QC process to help ensure information is accurate.
- Using Calendar Reminders to ensure compliance deadlines are met.

APPENDIX 1 INCLUSIONS

- None

Specifications 5.2 – SSMP Development and Implementation

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Specification 5.2; pg. 18)

> *"To facilitate adequate local funding and management of its sanitary sewer system(s), the Enrollee shall develop and implement an updated Sewer System Management Plan. The scale and complexity of the Sewer System Management Plan, and specific elements of the Plan, must match the size, scale, and complexity of the Enrollee's sanitary sewer system(s). The Sewer System Management Plan must address, at minimum, the required Plan elements in Attachment D (Sewer System Management Plan – Required Elements) of this General Order. To be effective, the Sewer System Management Plan must include procedures for the management, operation, and maintenance of the sanitary sewer system(s). The procedures must: (1) incorporate the prioritization of system repairs and maintenance to proactively prevent spills, and (2) address the implementation of current standard industry practices through available equipment, technologies, and strategies."*

COMPLIANCE

This SSMP has been completely updated to meet the requirements of Order WQ 2022-0103-DWQ and address all required Elements and Specifications required by the Order. The SSMP addresses management, operations, and maintenance procedures specific to the District's collection system. The District maintains a proactive O&M program to operate its system and identify defects, which are then prioritized for repair, replacement, rehabilitation, or placed on modified maintenance schedules. (See Elements 4 and 8 and Specifications 5.19 of this SSMP for more details).

The District keeps up with current industry standards, technology, and best practices by reviewing industry periodicals, networking, and attending industry conferences and workshops. The District also continuously evaluates emerging practices, equipment, and technologies for possible implementation to enhance operations.

Specifications 5.7 – Allocation of Resources

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Specification 5.7; pg. 22)

"The Enrollee shall comply with the following requirements:

- *Establish and maintain a means to manage all necessary revenues and expenditures related to the sanitary sewer system; and*
- *Allocate the necessary resources to its sewer system management program for:*
  - *Compliance with this General Order,*
  - *Full implementation of its updated Sewer System Management Plan,*
  - *System operation, maintenance, and repair, and*
  - *Spill responses."*

COMPLIANCE

The District maintains various revenue sources to ensure financial stability, meet its operational needs, and manage all necessary expenditures for operating its sewer system. The District equipment inventory and staffing levels are adequate to effectively implement this SSMP, properly manage the collection system, and respond to emergencies.

Provisions 6.1 – Enforcement Provisions

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Provision 6.1; pg. 27)

> *"The following enforcement provisions are based on existing federal and state regulations, laws and policies, including the federal Clean Water Act, the state Water Code and the State Water Board Enforcement Policy."*

COMPLIANCE

The District is aware of the consequences for non-compliance, including associated penalties for violations. The District maintains a proactive stance by fully implementing its SSMP.

Non-compliance with the requirements of this General Order, or discharging sewage without enrolling in this General Order, constitutes a violation of the Water Code and a potential violation of the Clean Water Act, and is grounds for an enforcement action by the State Water Board or the applicable Regional Water Board. Failure to comply with the notification, monitoring, inspection, entry, reporting, and recordkeeping requirements may subject the District to administrative civil liabilities of up to $10,000 a day per violation pursuant to Water Code section 13385; up to $1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement. Discharging waste not in compliance with the requirements of this General Order or the Clean Water Act may subject the District to administrative civil liabilities up to $10,000 a day per violation and additional liability up to $10 per gallon of discharge not cleaned up after the first 1,000 gallons of discharge; up to $5,000 a day per violation pursuant to Water Code section 13350 or up to $20 per gallon of waste discharged; or referral to the Attorney General for judicial civil enforcement.

Provisions 6.3 – Sewer System Management Plan Availability

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Provision 6.3; pg. 31)

> *"The Enrollee's updated Sewer System Management Plan must be maintained for public inspection at the Enrollee's offices and facilities and must be available to the public through CIWQS and/or on the Enrollee's website, in accordance with section 3.8 (Sewer System Management Plan Reporting Requirements) of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirements) of this General Order."*

COMPLIANCE

After finalizing this SSMP, the District anticipates uploading the final document to the CIWQS database and publishing it on the District website. In addition, the SSMP is available for public review at District offices, by appointment, during regular business hours.

2. Organization

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-2; pg. D-3)

"The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organization chart or similar narrative documentation that includes:

- *The name of the Legally Responsible Official as required in section 5.1 (Designation of a Legally Responsible Official) of this General Order;*
- *The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan Element;*
- *Organizational lines of authority; and*
- *Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. (For example, county health officer, county environmental health District, and State Office of emergency Services.)*

COMPLIANCE

The above items are addressed below:

District Legally Responsible Official (LRO) is listed below:

- Eric Steinlicht (District General Manager)
- Todd Albert (General Services Supervisor)
- Office Manager

The District's LRO meets the requirements outlined in Specifications 5.1 of the WDR and is authorized to submit verbal, electronic, and written spill reports to the RWQCB, SWRCB, Tuolumne County Health Department, and County and State OES. The LRO, as the District's designated LRO, is authorized to certify electronic spill reports submitted to the State Water Board.

Specific SSMP responsibilities for the core WDR requirements are presented in Table 4 – District Implementation Responsibilities (below), followed by Table 5 – District SSMP Responsible Position Contact Information. Figure 4 – District Organizational Chart (below) summarizes appropriate SSMP organizational staffing responsibilities for the District. And finally, Figure 5 – Chain of Communication for Reporting Spills (below) presents the overarching chain of communication for reporting sewage spills.

IMPLEMENTATION RESPONSIBILITIES

Sewer System Management Plan Elements	Responsible Position
1. SSMP Plan, Goal, and Introduction	District LRO
1.1. Regulatory Context	District LRO
1.2. SSMP Update Schedule	District LRO
1.3. Sewer System Asset Overview	District LRO
2. Organization	District LRO
3. Legal Authority	District LRO
4. Operations and Maintenance Program	District LRO
4.1. Updated maps of the Sanitary Sewer System	District LRO
4.2. Preventive Operation & Maintenance	District LRO
4.3. Training	District LRO
4.4. Equipment Inventory	District LRO
5. Design/Performance	District LRO
5.1. Updated Design Criteria & Construction Standards	District LRO
5.2. Procedures and Standards	District LRO
6. Spill Emergency Response Plan	District LRO
7. Sewer Pipe Blockage Program	District LRO
8. System Eval, Capacity Assurance, Capital Imp.	District LRO
8.1. System Evaluation and Condition Assessment	District LRO
8.2. Capacity Assessment and Design Criteria	District LRO
8.3. Prioritization of Corrective Action	District LRO
8.4. Capital Improvement Plan	District LRO
9. Monitoring, Measurement & Program Modifications	District LRO
10. Internal Audits	District LRO
11. Communication Program	District LRO

Table 4 – District Implementation Responsibilities

RESPONSIBLE POSITION CONTACT INFORMATION

Name	Title	Phone	Email
Eric Steinlicht	General Manager/LRO	(760) 742-1909	eric.steinlicht@paumavalleycsd.ca.gov

Table 5 – District SSMP Responsible Position Contact Information

2.1. Organizational Chart

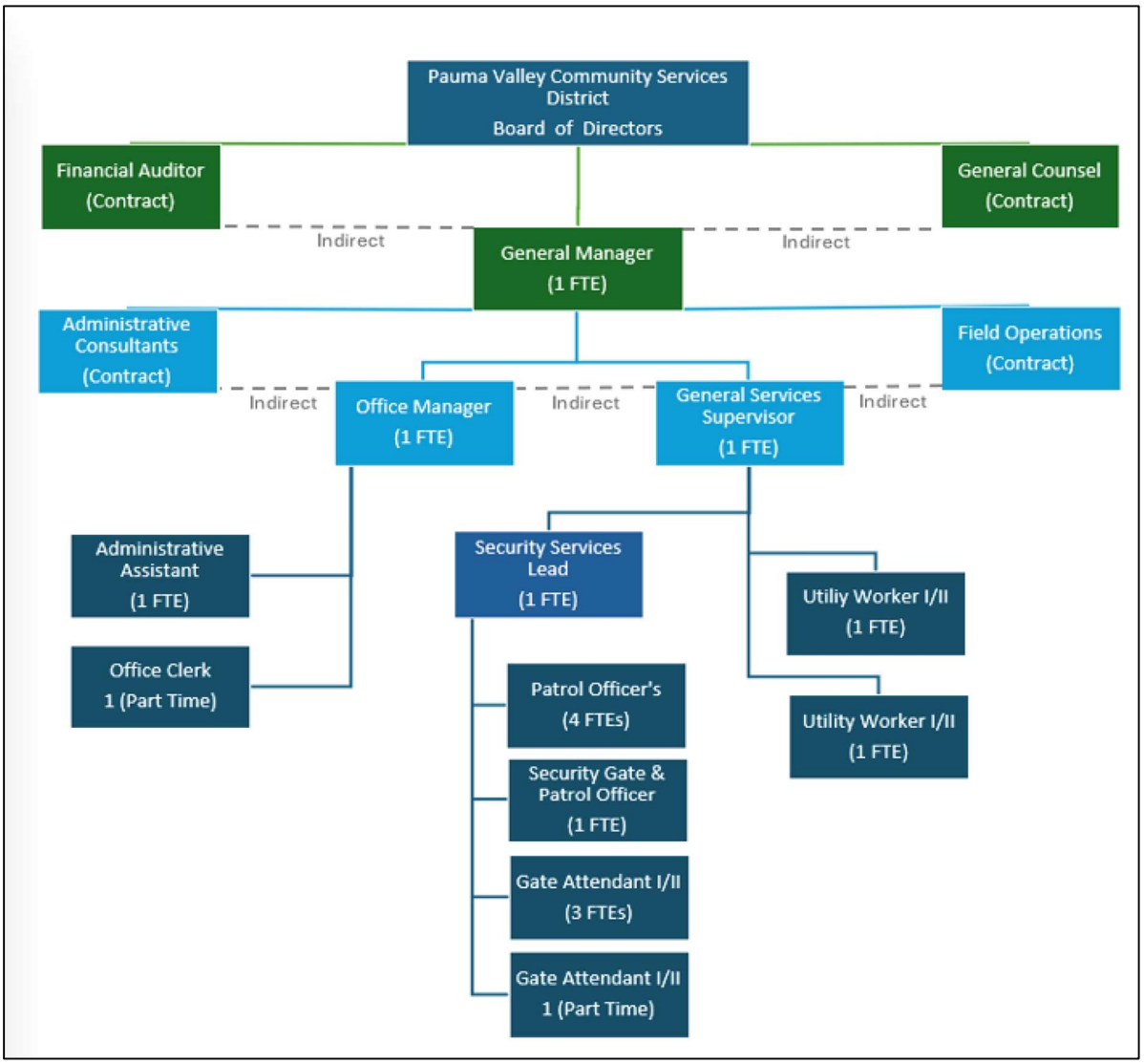

Figure 4 – District Organizational Chart

2.2. Organizational Staffing Responsibilities

Position	Narrative Explanation
Board of Directors	• Provides policy direction and appropriates funds to implement SSMP activities
LRO	• Authorized representative. • Manages day-to-day operations and maintenance. • Updates the SSMP and CMMS. • Oversee O&M staff, including spill response. • Receives and enters reports of spills in CIWQS and notifies other regulatory agencies. • Oversee SSMP training. • Manages non-routine spill response activities. • Regulatory agency liaison and acts as an LRO. • Manages and oversees the work of field staff, consultants, and contractors in the repair/rehabilitation of sewers, pump stations, and the treatment plant. • Reviews sewer plans and inspects sewer installations for conformance with the District's Design and Construction Standards. • Maintains the District's Capital Improvements Program, prioritizing work and managing budget, scope, and schedule of all projects. • Performs sewer cleaning, maintenance, and CCTV inspection services. • Supports spill containment and clean-up activities as directed by the District. • Oversee the SSMP, including performance and budget. • Supervises, administrative, and O&M functions include capital improvement activities.
Contractors	• Outside technical support for plant and sewer capital projects as directed by District LRO.

Table 6 – District Organization Positions and Responsibilities

The District is committed to continuously assessing its resources and needs for maintaining, managing, and operating its collection system.

2.3. Chain of Communication for Reporting Spills

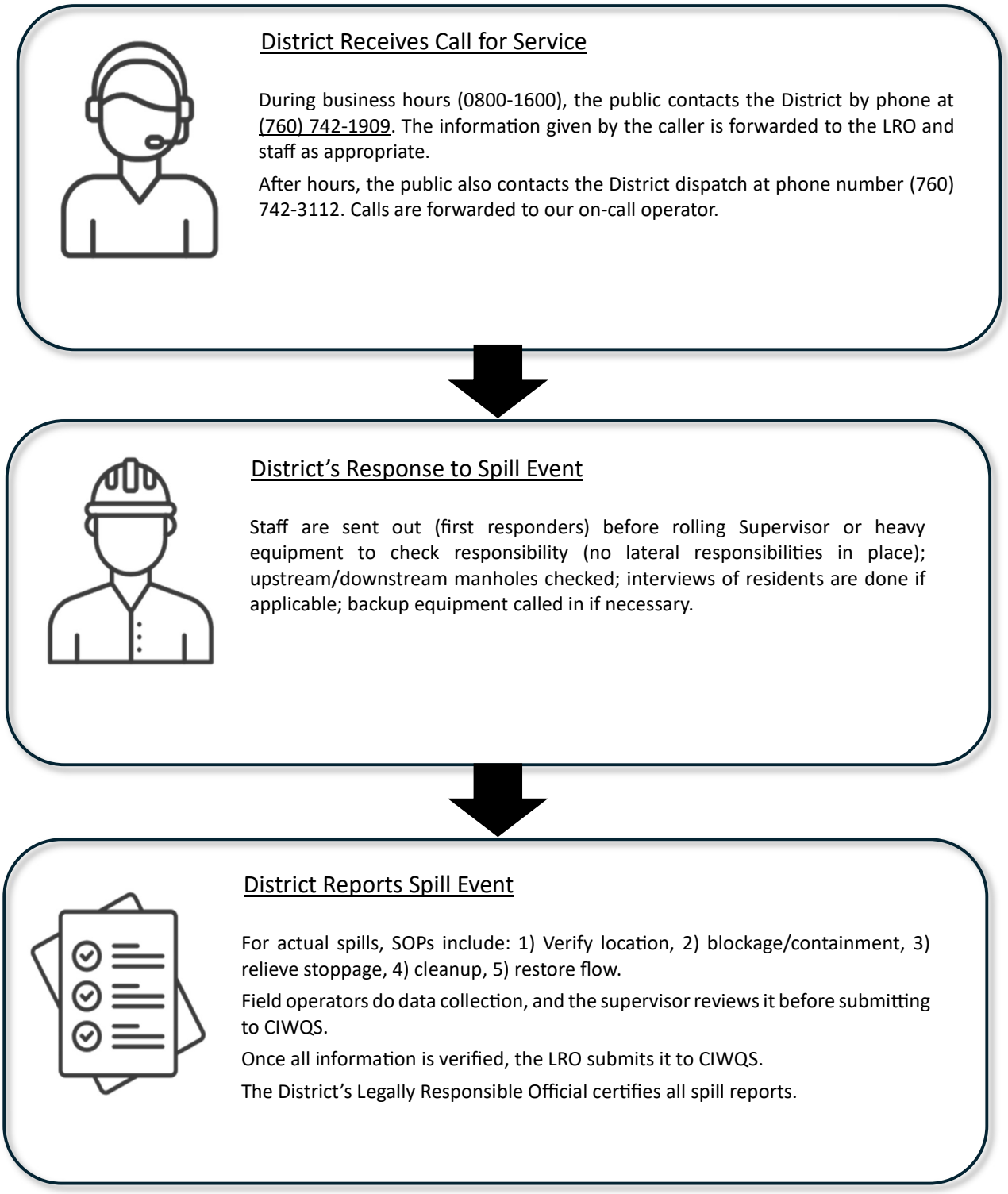

Figure 5 – Chain of Communication for Reporting Spills

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Have there been any changes requiring updates to the Organizational Chart?
- Have there been instances when a service call for a spill was not properly routed to response personnel?
- Were all spill response activities documented and forwarded to the LRO?
- Have there been any changes in assigned responsibilities for implementing the SSMP?
- Is there a process in place to ensure all contact information remains up to date?

IMPLEMENTATION PLAN/SCHEDULE

See "2. Organization" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 2 by:

- Ensuring that more than one person is capable and responsible for specific duties for SSMP implementation, e.g., back-up personnel.
- Designation of more than one LRO to help ensure full and continuous coverage of duties.
- Testing the phone notification system to ensure calls are received and routed to appropriate personnel.

APPENDIX 2 INCLUSIONS

- None

3. Legal Authority

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-3; pg. D-4)

> *"The Plan must include copies or an electronic link to the Enrollee's current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority to:*
>
> - *Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that may cause blockages;*
> - *Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure;*
> - *Require that sewer system components and connections be properly designed and constructed;*
> - *Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee;*
> - *Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures; and*
> - *Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.*

COMPLIANCE

The above items are addressed by the District in the order below.

The District has established authority to prevent illicit discharges into the District's Wastewater Collection System through:

- Ordinance No. 7 adopted 8/8/1972 and Ordinance No. 50 adopted 6/19/2008 and revised 5/29/2019.

The District collection system is stand-alone, and the District is responsible for select storm drain systems within the Pauma Valley Country Club Estates area. The District coordinates with the Pauma Valley Roadway Association and other private entities for servicing such assets.

The District requires that all sewer system components and connections be properly designed and constructed through:

- Ordinance No. 50 adopted 6/19/2008 and revised 5/29/2019, and Ordinance No. 54 adopted 03/25/2019 and amended 05/27/2025.

District facilities are accessible and located within legal easements to ensure maintenance, or coordinated with, for ensuring necessary O/M.

The District has established legal authority to enforce compliance with its sewer ordinances, service agreements, and other legally binding procedures under Ordinance No. 50.

The District does not own or maintain sewer service laterals as of 05/27/2025 via Ordinance No. 54.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Are the District ordinances and standards adequate for fulfilling the SSMP Plan legal requirements?
- Does the District have a process in place for periodic review and evaluation of ordinances?
- Have there been instances when the code or ordinance did not address a need or circumstance?

IMPLEMENTATION PLAN/SCHEDULE

See "3. Legal Authority" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 3 by:

- Keeping abreast of industry trends and local ordinances that may affect operations.

APPENDIX 3 INCLUSIONS

- None

4. Operation and Maintenance Program

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-4; pg. D-4)

> *"The Plan must include the items listed below that are appropriate and applicable to the Enrollee's system."*

4.1. Updated Map of Sewer System

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-4.1; pg. D-4)

> *"An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s). The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries."*

COMPLIANCE

The District currently maintains its sewer collection system map electronically on a geographic information system. The District also keeps maps of the sanitary sewer collection system on plat sheets at the District office as well. The plat sheets are organized in quarter sections of land, showing wastewater collection components, including lateral locations, pipeline sizes, and manholes with rim elevation, lift stations and air-vacs. Since the District is mostly built-out and there has been little to no growth in the service area, maps are updated very infrequently.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Were all map updates completed promptly?
- Are all staff trained in the procedure for providing map update information?
- Are newly installed sewer assets incorporated into the system maps?
- Are there terrain features or assets that should be incorporated in future map updates (e.g., exposed pipe, siphons, ARVs, surface water, etc.)

IMPLEMENTATION PLAN/SCHEDULE

See "4.1 Updated Map of Sewer System" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

4.2. Preventive Operation and Maintenance Activities

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-4.2; pg. D-4/D-5)

"A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors. The scheduling system must include:

- *Inspection and maintenance activities;*
- *Higher-frequency inspections and maintenance of known problem areas, including areas with tree root problems;*
- *Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.*

The data collection system must document data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure."

COMPLIANCE

The purpose of a work order system is to program and track all required inspection and maintenance activities within the collection system to help proactively prevent blockages/operational problems or spills. The District uses (email, and a service request system on the website) which enables it to make informed decisions about its assets and infrastructure by leveraging data collected from field work orders and documented inspections. The District has a full GIS system for all sewer assets.

The District's CMMS maintains historical data on all maintenance activities and provides a basis for critical analysis, data-driven planning, and decision-making today and into the future. This allows for prioritizing and planning routine activities such as CCTV inspections, pipe cleaning, and pump station maintenance activities. In addition, the CMMS is used to plan and schedule higher-frequency inspection and maintenance activities, such as Hot Spot cleanings throughout the system, and to support selective root control activities. Emergency and other reactive activities are also documented in work orders. The scheduling system allows staff to place certain activities on a preventive schedule, where the CMMS automatically creates work orders at a prescribed interval. Work orders for activities are generated by supervisory personnel as needed.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Are the District's maintenance, operations, and system work orders periodically audited for accuracy and completeness?
- Does the District monitor "open," "overdue," or "not yet completed" work orders to ensure completion of tasks?
- Are inspection and maintenance activities reducing the number and volume of spills?
- Is maintenance work being completed as scheduled?

IMPLEMENTATION PLAN/SCHEDULE

See "4.2 Preventive Operation and Maintenance Activities" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

4.3. Training

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-4.3; pg. D-5)

> *"In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors. The training must cover:*
>
> - *The requirements of this General Order;*
> - *The Enrollee's Spill Emergency Response Plan procedures and practice drills;*
> - *Skilled estimation of spill volume for field operators; and*
> - *Electronic CIWQS reporting procedures for staff submitting data."*

COMPLIANCE

The District's training program covers numerous areas related to wastewater collection systems and serves to develop and maintain highly qualified, knowledgeable, and capable staff. This training is provided through a variety of modes (self-study, seminars, conferences, on-the-job, etc.) and begins from the first day on the job and continues regularly thereafter.

Staff involved in responding to customer service calls, including sewage spills, receive annual training on the District's Spill Emergency Response Plan and trainings, to be completed by Fischer Compliance LLC. This training is part classroom and part hands-on exercises and drills for responding to spill events, including containment, restoring flow, spill volume, volume recovered, spill start-time estimation, cleanup, and completing spill-event data-collection forms.

The District utilizes Fischer Compliance, LLC for providing spill response training guidance and is developing new spill response procedures for Contract Service personnel who perform work for the District, requiring them to:

- Immediately notify the District of any sewage spill they encounter.
- Make attempts to contain the spill.
- Cordon off the area to keep the public safe; and
- Remain on-site until District staff arrives and relieves them.

In addition to the above, the District holds internal training sessions on dozens of topics, including, but not limited to, safety, fieldwork, first aid, spill response, and CWEA certification. Training occurs on an annual, biannual, triannual, or as-needed basis, depending on the training subject or District staff certification requirements. The District maintains a record of formal training sessions and documents staff attendance. In addition, the District operators hold weekly safety meetings to discuss safety procedures for miscellaneous job-related topics.

The LRO, with outside support from Fischer Compliance, attends Legally Responsible Official (LRO) related trainings and Spill Emergency Response Plan (SERP trainings). This includes internal and external mock spill drills to help the sewer crew evaluate their preparedness to respond to spills and practice response procedures. Spill drills focus on having the sewer crew record the appropriate information about the spill as if they were in the field and require the LRO and LRO to walk through the regulatory agency notification

procedures. District staff also participate in continuing education trainings, including but not limited to California Water Environment (CWEA) local sections and the California Special District's Associations (CSDA).

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Has all training been completed as scheduled?
- Have records of training and attendance been documented and maintained?
- Have all staff demonstrated ability and knowledge after each training event?
- Have contractors received, at a minimum, training for reporting and responding to spills?

IMPLEMENTATION PLAN/SCHEDULE

See "4.3 Training" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

4.4. Equipment Inventory

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-4.4; pg. D-5)

> *"An inventory of sewer system equipment, including the identification of critical replacement and spare parts".*

COMPLIANCE

The District maintains a host of equipment for both routine maintenance and for contingency or emergency operations. The District maintains a spare parts inventory and has identified "critical" parts, enabling the District to respond to and resolve issues promptly. This includes up-to-date equipment and replacement parts inventory maintained in District files. The District maintains equipment used for emergency operations in the event of a collection system failure, as well as replacement parts to repair facilities that are failing or at risk of failure.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Have inventory lists been audited as scheduled?
- Have any inventory deficiencies or omissions been discovered and rectified?
- Has the District experienced any equipment failure that inhibited a spill response?

IMPLEMENTATION PLAN/SCHEDULE

See "4.4 Equipment Inventory" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 4 by:

- Developing an SOP for updating maps when errors are discovered.
- Developing and using forms (paper or electronic) for data collection to help ensure all pertinent information is consistently collected.
- Periodically evaluating inspection cycle intervals to help ensure they are optimized.
- Requiring staff to demonstrate ability and/or knowledge for all training activities.
- Monitoring equipment and critical spare parts usage for trends.
- Performing periodic audits of the vehicle and equipment inventory List.

APPENDIX 4 INCLUSIONS

- Appendix 4.1 (Detailed District Sewer Map)

Specifications 5.19 – Operations and Maintenance

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Specification 5.19; pg. 27)

> *"To prevent discharges to the environment, the Enrollee shall maintain in good working order, and operate as designed, any facility or treatment and control system designed to contain sewage and convey it to a treatment plant."*

COMPLIANCE

To comply with these requirements, the District has established work programs for the operation and maintenance of its sanitary sewer collection system.

Gravity Main Cleaning

The goal is to clean all gravity mains approximately every 10 years. Each year, one section of the 10-year cleaning program is cleaned and inspected. Hot Spot areas are identified and scheduled for cleaning at established frequencies (bi-annually) based on pipe condition severity and the risk of pipe failure.

The District's sewer maintenance staff and contractors collect all observations made during sewer cleaning operations regarding the extent and nature of materials removed. The matrix below provides guidance for any changes to be made to the frequency of the "hot spot" pipes based on cleaning results and/or CCTV data.

Gravity Main inspection (CCTV)

CCTV inspections are completed on an ongoing basis as part of the 10-year cleaning and inspection program. The District also recently completed CCTV inspection via outside contracting covering the entire gravity sewer system network. Pipelines with issues found during sewer cleaning are also followed up with CCTV to assess the condition of the pipe. If a spill occurs, the area of the blockage will be monitored by CCTV as part of a routine follow-up procedure.

The District implements an inspection program that consists of both visual inspections and video inspections. The visual inspections consist of frequent examination of known problem areas. District staff open manholes and visually inspect flow levels, structural condition and other possible operating issues and report any necessary work to the CPO.

The District inspects its pipes post the annual cleaning, in tandem. The inspections would review the entire system approximately every 10 years. The program would utilize National Association of Sewer Services Companies (NASSCO) Pipeline Assessment Certification Program (PACP) standards for the coding and ranking of defects. Findings would be stored in an excel spreadsheet and would be used to inform the District on necessary or immediate maintenance or structural repairs.

Manhole Inspections

The District anticipates implementing a system-wide manhole inspection program before completion of its next required SSMP Audit in 2028.

Easement Maintenance

Easement areas are inspected As needed to confirm access and manage vegetation growth. The District anticipates further review and updating of its existing easement program, specific to this requirement, prior to completion of its next required SSMP Audit, due in 2028.

Root Control

Currently, the District does not have an established chemical root-control application program. The District is committed to further assessing its existing O/M program for maintaining managing and operating its collection system.

5. Design and Performance Provisions

5.1. Updated Design Criteria/Construction Standards/Specifications

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-5.1; pg. D-5)

> *"Updated design criteria, and construction standards and specifications, for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic Capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria".*

COMPLIANCE

The District utliizes the County of San Diego's current standard design standards for its sewer system.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Is plan checking QA/QC processes helping to ensure adherence to the standards?

IMPLEMENTATION PLAN/SCHEDULE

See "5.1 Updated Design Criteria/Construction Standards/Specifications" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

5.2. Procedures and Standards

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-5.2; pg. D-5)

> *"Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances".*

COMPLIANCE

The District utliizes the County of San Diego's current standard design procedures and standards for its sewer system.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Were any design or installation deficiencies found during warranty inspections?
- Are deviations from standard procedures and/or specs, testing, etc., justified and documented?
- Does the District stay abreast of industry design standards and technical advances in the industry?

IMPLEMENTATION PLAN/SCHEDULE

See "5.2 Procedures and Standards" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 5 by:

- Staying abreast of industry trends and standards.
- Performing warranty inspections of newly installed or repaired assets to evaluate design and installation practices.
- Evaluating as-built changes for trends and areas for design and performance improvements.

APPENDIX 5 INCLUSIONS

- None

6. Spill Emergency Response Plan

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-6; pg. D-6)

"The Plan must include an up-to-date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to:

- *Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;*
- *Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;*
- *Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders;*
- *Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained;*
- *Address emergency system operations, traffic control and other necessary response activities;*
- *Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;*
- *Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;*
- *Remove sewage from the drainage conveyance system;*
- *Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;*
- *Implement technologies, practices, equipment, and inter-District coordination to expedite spill containment and recovery;*
- *Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;*
- *Conduct post-spill assessments of spill response activities;*
- *Document and report spill events as required in this General Order; and*
- *As needed, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed."*

COMPLIANCE

The District's Spill Emergency Response Plan (SERP) is a stand-alone document that contains all the key elements necessary for an appropriate spill response: notification, emergency incident response, reporting, and impact mitigation. The current plan, prepared by Fischer Compliance LLC, meets and exceeds all requirements of the WDR, which became effective on June 5, 2023. The District anticipates completing Initial training on the SERP As needed. A copy of the SERP is available for viewing at the District office upon request.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Have staff's spill response efforts helped to prevent the discharge of sewage to surface waters?
- Do post-spill assessments indicate staff are following the procedures outlined in the SERP?
- Is SERP training effective, and are trainees demonstrating adequate knowledge and abilities?

IMPLEMENTATION PLAN/SCHEDULE

See "6. Spill Emergency Response Plan" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 6 by:

- Multiple staff are trained to respond to spill events.
- Post-spill assessments are conducted to evaluate staff's adherence to the SERP and to identify areas for improvement.
- Data collection forms are used by field staff to collect all the required data to be submitted to CIWQS and are designed as a guide to a proper spill event response.
- The District employs several different spill volume estimation methods to account for different circumstances.

APPENDIX 6 INCLUSIONS

- None

7. Sewer Pipe Blockage Program

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-7; pg. D-7)

"The Sewer System Management Plan must include procedures for the evaluation of the Enrollee's service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags and debris. If the Enrollee determines that a program is not needed, the Enrollee shall provide justification in its Plan for why a program is not needed.

The procedures must include, at minimum:

- *An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances;*
- *A plan and schedule for the disposal of pipe-blocking substances 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 substances generated within a sanitary sewer system service area;*
- *The legal authority to prohibit discharges to the system and identify measures to prevent spills and blockages.*
- *Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping and reporting requirements;*
- *Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the fats, oils, and grease ordinance;*
- *An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and*
- *Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above."*

COMPLIANCE

In many sanitary sewer collection systems, Fats, Oils, and Grease (FOG) is a significant cause of sewer blockages in pipes, as well as a contributor to operational disruptions and damage to sewage pump stations. Although service areas that include commercial and institutional food service establishments (FSEs) are obvious sources of FOG, residential communities, especially those with medium- and high-density multi-family residences, can also be significant sources of FOG. The purpose of the FOG Control Program is to ensure that all customers in our service area comply with the District Ordinance and state and federal requirements, and to prevent sewage overflows caused by FOG-related blockages in our sewer collection system.

To implement the above requirements the District complies with this requirement through the following measures:

Public Outreach:

Public education for this effort is primarily implemented through restaurant inspections. The District conducts periodic inspections on a biannual cycle and provides outreach materials to residences and businesses.

Pipe Blocking Substances:

The District has legal authority to limit fats, oils, and grease under the District Code No 50. Currently, 2 Food Service Establishments are connected to the District's collection system.

Grease Control Devices:

The District does not have legal authority to require installation of grease interceptors to limit fats, oils, and grease. However, the District relies on its authority granted in District Code No. 50 for control measures to limit grease and FOG discharges into the sanitary sewer system. Via Ordinance No. 50, for establishments that do not install a grease interceptor, the District maintains the authority to pass enhanced cleaning costs onto the customer when applicable.

Inspections:

The District has established legal authority requiring inspections via District Code No. 50 to limit grease-producing facilities.

Portions of Sewers Subject to FOG:

The District maintains a list of Hot Spot cleaning program locations, including sections subject to FOG build-up and blockages. The “Areas of Interest” or Hot Spots are scheduled for more frequent cleanings and monitoring and are available on request.

Source Control Measures:

- The District does not have a formal established source control program for its wastewater facility at this time.
- The District is committed to monitoring causes of spills caused by FOG sources.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Have there been any blockages/spills from any identified problem area?
- Is the District receiving feedback on public outreach efforts?
- Are the debris and other sewage solids collected during cleaning activities being disposed of appropriately?
- Have there been spills due to excessive fats, oils, grease, roots, or non-disposable wipes discovered in the sewer system during the audit period?
- Are there repeat offenders among FSEs?
- Are enforcement trends decreasing?
- Are Source Control and Collection staff included in the plan check process?

IMPLEMENTATION PLAN/SCHEDULE

See "7. Sewer Pipe Blockage Program" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 7 by:

- Inspection of select assets directly downstream of grease-producing businesses to ensure source control is effective.
- Residential FOG outreach and education program.
- Performance of regular assessments of system assets to monitor performance.
- QA/QA process for evaluating pipe cleaning effectiveness.
- Daily disposal of pipe blocking materials retrieved during maintenance activities.

APPENDIX 7 INCLUSIONS

- None.

8. System Evaluation, Capacity Assurance, Capital Improvements

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-8; pg. D-7)

"The Plan must include procedures and activities for:

- *Routine evaluation and assessment of system conditions;*
- *Capacity assessment and design criteria;*
- *Prioritization of corrective actions; and*
- *A capital improvement plan."*

8.1. System Evaluation and Condition Assessment

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-8.1; pg. D-7/D-8)

"The Plan must include procedures to:

- *Evaluate the sanitary sewer system assets utilizing the best practices and technologies available;*
- *Identify and justify the amount (percentage) of its system for its condition to be assessed each year;*
- *Prioritize the condition assessment of system areas that:*
    - *Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, Capacity issues, or other system deficiencies;*
    - *Are located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas;*
    - *Are within the vicinity of a receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List.*
- *Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection method;*
- *Utilize observations/evidence of system conditions that may contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State;*
- *Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities; and*
- *Identify system assets vulnerable to potential impacts of climate change, including but not limited to: sea level rise; flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions."*

COMPLIANCE

Assessments:

The assessment of a collection system includes all components of the District collection system, including gravity mains, laterals, manholes, and pump stations. It is of key importance to regularly conduct condition assessments to establish a baseline and monitor changes over time. Gravity pipes are CCTV inspected, and manholes and pump stations are visually inspected.

The District implements an inspection program that consists of both visual inspections and video inspections. The visual inspections consist of frequent examination of known problem areas. District staff open manholes and visually inspect flow levels, structural condition and other possible operating issues and report any necessary work to the CPO.

Pipeline Replacements:

Approximately XXX linear feet of deteriorated vitrified clay (VC) pipe has been identified for full replacement due to significant structural degradation and reduced service reliability.

Pipeline Rehabilitation (CIPP):

Approximately 500 linear feet of existing pipeline at the minimum is anticipated to be rehabilitated prior to 2032, as resources allow.

These improvements are intended to enhance overall system performance, reduce ongoing maintenance costs, and mitigate risks associated with pipeline failure and sanitary sewer overflows.

CCTV:

The CCTV inspections review the entire system approximately every 10 years, in tandem with the cleaning program. The program would utilize National Association of Sewer Services Companies (NASSCO) Pipeline Assessment Certification Program (PACP) standards for the coding and ranking of defects. Findings would be stored in an excel spreadsheet and would be used to inform the District on necessary or immediate maintenance or structural repairs.

Repairs:

The District makes consistent efforts to repair and seal segments of sewer pipe to prevent spills from breakages and reduce I & I into the collection system.

Manholes:

The District does not currently have a formal manhole inspection program but anticipates having a systematic program in place by 2028.

Exfiltration:

The District is not aware of any sewage exiting from the system. Any observation(s) within the District's sewer system that indicate imminent failure warrant an immediate response.

Documentation:

Documents related to system evaluation and condition assessment are maintained on the District's intranet and are available on request.

Climate Planning:

The District has evaluated its collection system for potential climate impacts and has determined that it is not susceptible to, and has mitigated, any such impacts. The District will re-evaluate these factors before its next SSMP audit cycle in 2028.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Has the District maintained its schedule for (information needed), and is data being reviewed promptly?
  - CCTV Gravity Mains
  - Laterals
  - Manholes
  - Pump Stations
- Are inspection efforts discovering deficiencies promptly?
- Are maintenance and inspection activities being properly documented?

IMPLEMENTATION PLAN/SCHEDULE

See "8.1 System Evaluation and Condition Assessment" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

8.2. Capacity Assessment and Design Criteria

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-8.2; pg. D-8/D-9)

"The Plan must include procedures to identify system components that are experiencing or contributing to spills caused by hydraulic deficiency and/or limited Capacity, including procedures to identify the appropriate hydraulic Capacity of key system elements for:

- *Dry-weather peak flow conditions that cause or contributes to spill events;*
- *The appropriate design storm(s) or wet weather events that causes or contributes to spill events.*
- *The Capacity of key system components; and*
- *Identify the major sources that contribute to the peak flows associated with sewer spills.*

The Capacity assessment must consider:

- *Data from existing system condition assessments, system inspections, system audits, spill history, and other available information;*
- *Capacity of flood-prone systems subject to increased infiltration and inflow, under normal local and regional storm conditions;*
- *Capacity of systems subject to increased infiltration and inflow due to larger and/or higher-intensity storm events as a result of climate change;*
- *Increases of erosive forces in canyons and streams near underground and above-ground system components due to larger and/or higher-intensity storm events;*
- *Capacity of major system elements to accommodate dry weather peak flow conditions, and updated design storm and wet weather events; and*
- *Necessary redundancy in pumping and storage capacities."*

COMPLIANCE

No portion of the District's sanitary sewer system has historically or is currently experiencing spills caused by hydraulic deficiencies. The District does not currently implement complex hydraulic modeling for the sewer system and continues to monitor this requirement. Should hydraulic deficiencies be predicted or experienced, the District will design and implement necessary capacity enhancement measures as appropriate.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Number of Capacity-related spills or surcharge conditions during the audit period.
- Has the system responded to rain events as indicated by the hydraulic model?
- Have there been any changes to zoning designations (residential, commercial, industrial)?

IMPLEMENTATION PLAN/SCHEDULE

See "8.2 Capacity Assessment and Design Criteria" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

8.3. Prioritization of Corrective Action

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-8.3; pg. D-9)

> *The findings of the condition assessments and Capacity assessments must be used to prioritize corrective actions. Prioritization must consider the severity of the consequences of potential spills."*

COMPLIANCE

(see information outlined in section 8.1 above)

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Has the District adhered to its system evaluation/condition assessment schedule?
- Has the District adhered to its prioritization/corrective procedures for sewer repair and Capacity improvement projects?
- Have projects been completed before deficiencies caused failures?

IMPLEMENTATION PLAN/SCHEDULE

See "8.3 Prioritization of Corrective Action" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

8.4. Capital Improvement Plan

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-8.4; pg. D-9)

"The capital improvement plan must include the following items:

- *Project schedules include completion dates for all portions of the capital improvement program;*
- *Internal and external project funding sources for each project; and*
- *Joint coordination between operation and maintenance staff, and staff/consultants during planning, design, and construction of capital improvement projects; and Inter-District coordination with other impacted utility agencies."*

COMPLIANCE

The District is in full compliance with Section 8.4 of its Sewer System Management Plan (SSMP) and the associated Waste Discharge Requirements (WDR) Order.

The District does not have capacity-related system constraints, and therefore has not identified capacity-related projects in the Capital Improvement Program. However, the District does produce a Capital Expenditure Plan (CEP) every fiscal year that includes funds for updates and modifications to its system, as well as for sewer cleaning. The Capital Expenditure Plan includes a 5-year budgeting outlook. The FY2020-21 Plan dedicates $30,000 to Lift Station Repairs in the 2020-21 budget, as well as $60,000 for sewer line jetting in 2021-22. The District's Capital Improvement Program (CIP) provides a structured, ongoing framework for identifying infrastructure needs, establishing project schedules, and securing internal and external funding. The program ensures coordination among Operations, Maintenance, and other managers.

As of April 2026, the District has nearly completed the latest package of pipeline replacement and rehabilitation projects in critical portions of the sewer system, with the work scheduled to be completed by the fall of 2026. Additional future capital improvement projects are assessed, programmed, and funded as needed to address problem areas and spills.

In 2021, completed a comprehensive condition assessment of its sewer collection system. The purpose of this assessment was to evaluate the structural integrity and operational condition of existing infrastructure, identify deficiencies, and prioritize necessary improvements to ensure continued reliable service. The assessment included detailed pipeline inspections, condition ratings, and the identification of areas exhibiting deterioration, structural failure, root intrusion, and inflow and infiltration concerns.

The results of the condition assessment identified multiple segments of the sewer system requiring repair or replacement. Based on these findings, the District developed a targeted rehabilitation program to address the most critical deficiencies.
Key components of the project include:

Pipeline Replacement

Approximately 2,000 linear feet of deteriorated vitrified clay (VC) pipe have been identified for full replacement due to significant structural degradation and reduced service reliability.

Pipeline Rehabilitation (CIPP)

Approximately 9,792 linear feet of existing pipeline will be rehabilitated using the Cured-In-Place Pipe (CIPP) method, or equivalent modern day lining method. This trenchless technology enables structural renewal of pipelines while minimizing surface disrup on, reducing construc on impacts, and extending the service life of existing infrastructure.

These improvements are intended to enhance overall system performance, reduce ongoing maintenance costs, and mitigate risks associated with pipeline failure and sanitary sewer overflows.

Portions of rehabilitative work is currently underway and is scheduled to be completed by 2028, as resources allow.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Has the District's capital improvement plan schedule been adhered to?

IMPLEMENTATION PLAN/SCHEDULE

See "8.4 Capital Improvement Plan" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 8 by:

- Is there an annual review of the Capital Improvement Plan by all appropriate individuals?

APPENDIX 8 INCLUSIONS

- None

9. Monitoring, Measurement, and Program Modifications

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-9; pg. D-9)

"The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:

- *Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities;*
- *Monitoring the implementation and measuring the effectiveness of each Plan element;*
- *Assessing the success of the preventive operation and maintenance activities:*
- *Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and*
- *Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes."*

COMPLIANCE

The above requirements are addressed below. Further, before finalizing this SSMP, the District anticipates updating this element to include additional information and details to address all requirements specified in this section above.

- The District maintains accurate and relevant inspection and maintenance records for the collection system. Much of the documentation today is maintained electronically, which allows for ease of access and analysis. This helps District staff make sound decisions and prioritize activities when dealing with routine and unexpected situations.
- Monitoring of the District's SSMP focuses on each element in terms of its implementation and effectiveness. The SSMP has been designed to include key performance indicators for each element, which are used to measure effectiveness. In addition, implementation responsibilities are included for each element to help ensure the SSMP is being implemented as intended.
- The District assesses the success of maintenance and operation activities by ensuring activities are being performed as expected, by monitoring actual outcomes compared to intended outcomes, and by monitoring spill trends.
- The District is committed to continuous improvement and monitors and evaluates performance of work programs and SSMP elements to ensure intended outcomes are achieved while looking for areas for improvement. Although the SWRCB requires that the SSMP be updated every six years, it should be considered a dynamic document and may require more frequent updates. Routine changes to administrative information notwithstanding, minor changes will likely be required to address improvements identified through the SSMP Audit or to implement modifications as conditions change.
- The District monitors spill trends, at a minimum every three years during required audits, utilizing the CMMS database, inspection records, SCADA trends, and CIWQS data. These resources are helpful in

planning and programming work and in adjusting as needed, enabling the District to be adaptive and to capitalize on lessons learned.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Are SSMP Elements being periodically evaluated for effectiveness?
- Are work activities and spill events being documented?
- Has a plan and schedule been established to address audit findings/deficiencies from the last audit?
- Is Trend Analysis being performed on spill causes?
- Have work programs been assessed and updated as necessary?

IMPLEMENTATION PLAN/SCHEDULE

See "9. Monitoring, Measurement, and Program Modifications" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 9 by:

- Development of key performance indicators to measure the effectiveness of the SSMP.
- Performing periodic reviews of the SSMP to help ensure it is being properly implemented.
- Developing and adhering to a timeline to correct deficiencies found during the audit process.
- Periodically evaluating work programs to help ensure effectiveness.

APPENDIX 9 INCLUSIONS

- None

10. Internal Audits

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-10; pg. D-10)

> *"The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order."*

COMPLIANCE

The District completed its last audit with Fischer Compliance LLC in 2026 (see Appendix 10.1) and will complete the required audits every three (3) years moving forward. The objective of the audit is to evaluate compliance, implementation, and effectiveness of the SSMP. Additionally, the SSMP includes a description of how the District will comply with each Element's requirements. The audit review includes an evaluation to determine if compliance has been met.

Implementation is evaluated by determining if the District is executing the SSMP as stated.

Effectiveness is evaluated using key performance indicators developed specifically for each element. An additional evaluation is performed to comply with Specifications 5.6, which addresses resilience.

Resilience is addressed for each Element and is built into the Agency's collection systems, procedures, and practices.

Any deficiencies discovered during the audit process are noted, and a plan and schedule for implementing corrective measures are established.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Have audits been performed as required?
- Have the audits assessed compliance, implementation, and effectiveness?
- Have deficiencies been identified?
- Has a plan and schedule to rectify the deficiencies been established?

IMPLEMENTATION PLAN/SCHEDULE

See "10. Internal Audits" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 10 by:

- Periodically evaluating key performance indicators during the audit period to assess effectiveness and make corrections, if necessary, prior to the audit.
- Evaluating previous audits to ensure deficiencies have been rectified.
- Scheduling the audit due dates and completing the audit on time.

APPENDIX 10 INCLUSIONS

- 10.1. 2022-2025 SSMP Audit Report

11. Communication Program

WDR REQUIREMENTS

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D-11; pg. D-10)

"The Plan must include procedures for the Enrollee to communicate with:

- *The public for:*
  - *Spills and discharges resulting in closures of public areas, or that enter a source of drinking water; and*
  - *The development, implementation, and update of its Plan, including opportunities for public input to Plan implementation and updates.*
- *Owners/operators of systems that connect into the Enrollee's system, including satellite systems, for:*
  - *System operation, maintenance, and capital improvement-related activities."*

COMPLIANCE

When the District experiences a spill, it is standard procedure to secure the affected area and keep the public away. This is generally done using barricades, cones, and caution tape. Should the District experience a spill that may require the closure of public areas, signs will be placed immediately to indicate the issue and provide contact information. Staff will remain on site to provide an additional safety factor until appropriate authorities respond and direct staff otherwise. In all cases, the District will follow the advice of higher authorities, such as the local environmental health department and other regulatory authorities.

The District regularly communicates with the public about the development, implementation, and performance of its SSMP. The communication system allows the public to submit input to the District's SSMP and its implementation. This communication is provided through notices in the newsletter and on the District website. The SSMP and SSMP Audits are posted on the District website. Public comments are accepted at all monthly District Board meetings, and the District evaluates public input when provided and addresses questions and comments as appropriate.

To supplement resources, the District also has an established mutual assistance agreement with Yuima Municipal Water District to provide emergency assistance in the event of a major sanitary sewer spill. The District also has an ongoing agreement with contractor resources for both routine and emergency operations.

EFFECTIVENESS

The District utilizes the following Key Performance Indicators for measuring the effectiveness of this Element:

- Does the District place all SSMP action items on the agenda for regular counsel/board meetings?
- Does the District have signage or other means readily available to notify the public of environmental or public risk factors related to a sewage spill?
- Does the District perform outreach to residential customers?

IMPLEMENTATION PLAN/SCHEDULE

See "11. Communication Program" in the SSMP Action Items Checklist (Implementation Plans and Schedules) at the beginning of this document.

RESILIENCE

Resilience is addressed in Element 11 by:

- Use the SSMP as a tool to communicate to the public how the District is managing the system.
- Maintain a consistent presence in the service area by attending community events or issuing periodic newsletters or other communications to the public.
- Make it clear and easy for the public to contact the District.

APPENDIX 11 INCLUSIONS

- None

List of Appendices

APPENDIX 1	• None
APPENDIX 2	• None
APPENDIX 3	• None
APPENDIX 4	• None
APPENDIX 5	• None
APPENDIX 6	• None
APPENDIX 7	• None
APPENDIX 8	• None
APPENDIX 9	• None
APPENDIX 10	• 2022-2025 SSMP Audit Report
APPENDIX 11	• None

References

Bay Area Clean Water Agency (BACWA). (2024, July). *2024 Sewer System Management Plan Guidance Manual.* Retrieved from Bay Area Clean Water Agency (BACWA): https://bacwa.org/wp-content/uploads/2024/07/Guide-for-Developing-and-Updating-SSMPs-July-2024-1.pdf

State Water Resources Control Board. (2025). *SSMP & Audit Required Dates SSO Lookup Tool*. Retrieved from State Water Resources Control Board: https://www.waterboards.ca.gov/water_issues/programs/sso/lookup/

Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Attachment D., 2022, December 6). *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems.* Retrieved from State Water Resources Control Board, Water Quality Order No. 2022-0103-DWQ (Attachment D): https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0103-dwq.pdf

