

# Sewer System Management Plan (SSMP) Audit

(May 2021 to May 2024)



Prepared by:



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Executive Summary

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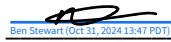
Reviewed and Approved By:

Bruce Katz  
Assistant Director, Utility Services

Benjamin Stewart  
Supervisor, Utility Services



Date: 10/31/24

  
Ben Stewart (Oct 31, 2024 13:47 PDT)

Date: 10/31/24

# CERTIFICATE

OF COMPLETION

CITY OF LANCASTER

## Sewer System Management Plan Audit

(May 2021-May 2024)

- *Regulatory review, agency expectations and compliance best practices.*
- *Regional Water Quality Control Board inspector expectations.*
- *Completion of State Water Board Pre-Inspection Questionnaire*
- *Completion of Compliance Evaluation Inspection (CEI).*
- *Findings/Best Practice Recommendations for further improving agency program effectiveness, compliance, and resilience.*



*Jim Fischer*

James Fischer, PE (NPDES Compliance Inspector)

7/11/24



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Mr. Bruce Katz  
City of Lancaster, Utility Services Department  
44933 Fern Ave  
Lancaster, CA 93534

August 21, 2024

Dear Mr. Katz,

We are pleased to present the 2021-2024 Sewer System Management Plan (SSMP) Audit Report for the City of Lancaster (see Attachment 1).

The SSMP Audit revealed that the City is in full compliance with Attachment D-10 of the Sanitary Sewer Collection System [Reissued WDR \(State Water Board, Water Quality Order No. 2022-0103-DWQ\)](#). The Audit also shed light on many existing and successful City best practices and presents additional potential areas to consider for further improvement. When comparing the City spill performance metrics with other collection systems in the Lahontan Regional Water Board area and throughout the State, the City performs near the top.

Detailed desktop and field reviews incorporating USEPA/Water Board Compliance Evaluation Inspection (CEI) procedures, including comprehensive interviews with management and field staff were relied upon for generating the Audit findings and best practice recommendations. With completion of the Audit, the City is now one of the first in the State to be comprehensively evaluated under the Reissued WDR, approximately 3 months ahead of schedule.

We look forward to supporting the City with ongoing work program optimizations to help the City remaining one of the best-in-class sanitary sewer collection systems we have assessed in the State of California.

Sincerely,

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

Attachment 1 (2021-2024 Sewer System Management Plan Audit Report)

## PART 1 (Executive Summary)

The City of Lancaster (City) is charged with complying the State Water Resources Control Board (SWRCB) General Reissued Waste Discharge Requirements (WDR) for Sanitary Sewer Systems (“Reissued WDR”, Order No. 2022-0103-DWQ). The Reissued WDR replaced the original 2006 WDR (Order No. 2006-003-DWQ and its Monitoring and Reporting Program, Order No. 2013-0058-EXEC), which became effective on June 5, 2023.

The Reissued WDR requirements are the strictest sewer regulations in the country requiring a proactive approach for operations, maintenance, and management of sanitary sewer collection system to reduce or eliminate sewer spills. Attachment D-10 of the Reissued WDR requires periodic SSMP Audits to be completed by the City at least every three years.

To comply with the SSMP Audit requirements, Fischer Compliance LLC in collaboration with City management completed a Sewer System Management Plan (SSMP) Audit covering May 2021 through May 2024.



This Audit report meets and exceeds the minimum requirements specified in the Reissued WDR (Attachment D-10 and Specifications 5.4), scaled to the size/complexity of the City’s sewer system. This includes evaluating the SSMP implementation and effectiveness, compliance with the Reissued WDR, and identifying deficiencies in addressing ongoing spills.

### Regulatory Background

The Reissued WDR requires local public sewer collection system agencies, referred to as “Enrollees,” to develop a Sewer System Management Plan (Sewer System Management Plan). Sewer System Management Plans must be audited (by City staff or outside consultants) at least every three (3) years and updated every six (6) years according to the Water Board’s regulatory schedule.

2006 WDR: To provide a consistent, statewide regulatory approach to address sewage spills, the State Water Resources Control Board (State Water Board) adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003 (SSS WDRs), on Feb 2, 2006. All public agencies that own or operate a sanitary sewer system that is comprised of more than one mile of pipes or sewer lines that convey wastewater to a publicly owned treatment facility were required to apply for coverage under the Order.

2022 WDR: The 2006 WDR was rescinded and replaced with a “Reissued WDR” (Order No. 2022-0103-DWQ), adopted on December 5, 2023 which became effective on 6/5/2023. The Reissued WDR updates many aspects of the 16-year-old Order and includes several new requirements for Sewer System Management Plans.

### SSMP Audit Procedures

A comprehensive SSMP Audit incorporating procedures developed by Fischer Compliance LLC was completed in June 2024. To complete the SSMP Audit, the following key elements were incorporated for the SSMP assessments:

- Evaluation of pre-Inspection questionnaires
- Interviews with City collection management and field including both online and onsite conferences
- Completion of a Compliance Evaluation Inspection (CEI) incorporating standards and procedures utilized by U.S. EPA and the Water Boards to evaluate sanitary sewer system compliance (see Appendix 1)
- Review of the City’s Sewer System Management Plan (SSMP)
- Review of City spill reports, system data, and other documentation

## Executive Summary

- Incorporation of guidelines and recommendations for SSMPs published by the Bay Area Clean Water Agencies (BACWA)<sup>1</sup> and available to all collection system agencies statewide as an industry standard practice publication on best practices for sanitary sewer operators.

### Collection System Information

The City owns and operates sanitary sewer collection system (collection system) serving a population of approximately 147,000. The collection system consists of approximately 439 miles of gravity sewer mains, 1 lift/pump station, and approximately 0.5 miles of pressure (“force main”) sewers. Figure 1 below provides an overview of the City’s current sanitary sewer system service area.

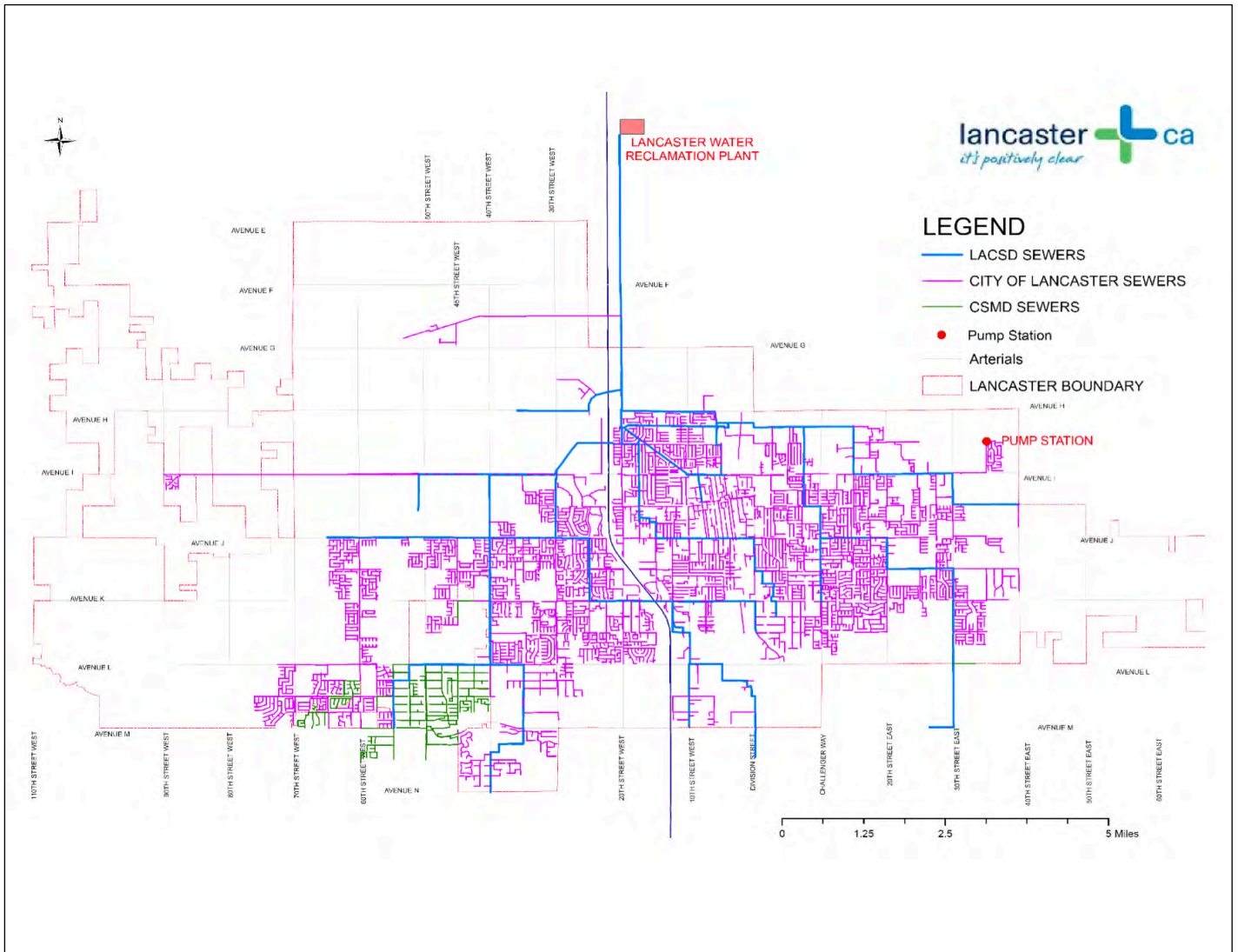


Figure 1 - City sewer map

<sup>1</sup> Available for download at: <https://bacwa.app.box.com/s/cucxst3w2c4fl53jopuyayt6b3u4xjs5/file/1489440015726>



Executive Summary

Figure 2 below provides a current Regulatory Measures report generated for the City contained in the State Water Board Database (CIWQS)<sup>2</sup>.

Related Parties						
Party	Party Type	Party Name	Role	Classification	Relationship Start Date	Relationship End Date
642970	Person	<a href="#">James LaDouceur</a>	Is A Data Submitter For		12/06/2023	
625627	Person	<a href="#">Ryan Brown</a>	Is A Data Submitter For		06/21/2021	07/22/2024
605051	Person	<a href="#">Benjamin Stewart</a>	Is Onsite Manager For		01/07/2020	
605667	Person	<a href="#">James Rush</a>	Is A Data Submitter For		01/06/2020	12/06/2023
589384	Person	<a href="#">Ryan Wesley Welch</a>	Is A Data Submitter For		11/26/2018	12/12/2019
588296	Person	<a href="#">Tim Zongker</a>	Is A Data Submitter For		11/16/2018	12/12/2019
565268	Person	<a href="#">Gabriel Nevarez</a>	Is Onsite Manager For		07/17/2017	12/13/2019
518470	Person	<a href="#">Bruce Katz</a>	Is Onsite Manager For		10/11/2016	
557041	Person	<a href="#">Steve Falcon</a>	Is A Data Submitter For		06/13/2016	09/10/2018
555549	Person	<a href="#">Mike Lazar</a>	Is A Data Submitter For		04/04/2016	06/10/2021
545632	Person	<a href="#">Jason Estavillo</a>	Is A Data Submitter For		03/11/2014	04/04/2016
531504	Person	<a href="#">Carlyle S Workman</a>	Is Onsite Manager For		01/30/2012	12/01/2016
531505	Person	<a href="#">Allen Thompson</a>	Is Onsite Manager For		01/30/2012	10/01/2016
518470	Person	<a href="#">Bruce Katz</a>	Is A Data Submitter For		11/14/2011	10/11/2016
527514	Person	<a href="#">Allen Thompson</a>	Is Onsite Manager For		06/24/2011	10/01/2016
525425	Person	<a href="#">Robert Neal</a>	Is Onsite Manager For		12/22/2010	09/16/2015
525260	Person	<a href="#">Jonathan Robnett</a>	Is A Data Submitter For		12/10/2010	10/24/2016
477544	Person	<a href="#">Donald Watkins</a>	Is A Data Submitter For		07/10/2008	11/20/2013
477543	Person	<a href="#">Kathy Renee</a>	Is Onsite Manager For		07/10/2008	12/19/2013
390931	Person	<a href="#">Peter Zorba</a>	Is A Data Submitter For		11/01/2007	11/20/2013
390583	Person	<a href="#">Steven Dassler</a>	Is Onsite Manager For		07/30/2007	01/01/2012
329626	Person	<a href="#">James Williams</a>	Is Onsite Manager For		07/13/2007	12/10/2010
26565	Organization	<a href="#">Lancaster City</a>	Owner		04/03/2006	
300466	Person	<a href="#">Robert LaSala</a>	Is Onsite Manager For		04/03/2006	01/01/2007
<b>Total Related Parties: 24</b>						

Regulatory Measures									
Reg Measure ID	Reg Measure Type	Region	Program	Order No.	WDID	Effective Date	Expiration Date	Status	Amended?
301325	Enrollee	6V	SSOMUNILRG	<a href="#">2022-0103-DWQ</a>	6SSO11136	11/21/2006		Active	N
<b>Total Reg Measures: 1</b>									

Violations							
Violation ID	Occurred Date	Violation Type	(-) Violation Description	Corrective Action	Status	Classification	Source
<b>Total Violations: 0</b>							
<b>Priority Violations: 0</b>							

Report displays most recent five years of violations. Refer to the [Interactive Violation Report](#) for more data.

\*Click the "(+/-) Violation Description" link to expand and contract the violation description.  
 \*As of 5/20/2010, the Water Board's Enforcement Policy requires that all violations be classified as 1, 2 or 3, with class 1 being the highest. Prior to this, violations were simply classified as Yes or No. If a 123 classification has been assigned to a violation that occurred before this date, that classification data will be displayed instead of the Yes/No data.

**Violation Types**

Enforcement Actions				
Enf Id	Enf Type	Enf Order No.	Effective Date	Status
427765	Oral Communication	null	11/20/2018	Historical
<b>Total Enf Actions: 1</b>				

Inspections						
Inspection ID	Inspection Type	Lead Inspector	Actual End Date	Planned	Violations	Attachment
28541531	B Type compliance inspection	Tobe Deleted	05/10/2017	N	0	<a href="#">[Attachments]</a>
6473515	Complaint inspection	Francis Michael Coony	10/31/2011	N	0	<a href="#">Download</a>
<b>Total Inspections: 2</b>						
<b>Last Inspection: 05/10/2017</b>						

The current report was generated with data as of: 08/19/2024

Figure 2 - City Regulatory Measures report (State Water Board Online Database, CIWQS)

<sup>2</sup>California Integrated Water Quality System (CIWQS), available publicly at the following link:

<https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/CiwqsReportServlet?inCommand=drilldown&reportName=facilityAtAGlance&placeID=630701&reportID=7029229>

**City SSMP/Audit Due Dates**

This section provides an overview of upcoming due dates for the City to update its SSMP and complete its next SSMP Audit. Figure 3 below displays a summary of the upcoming due dates for the City (5/2/2025 for the next SSMP Update and 11/2/2024, 6 months following the end of the Audit period for the next SSMP Audit to be uploaded to CIWQS).

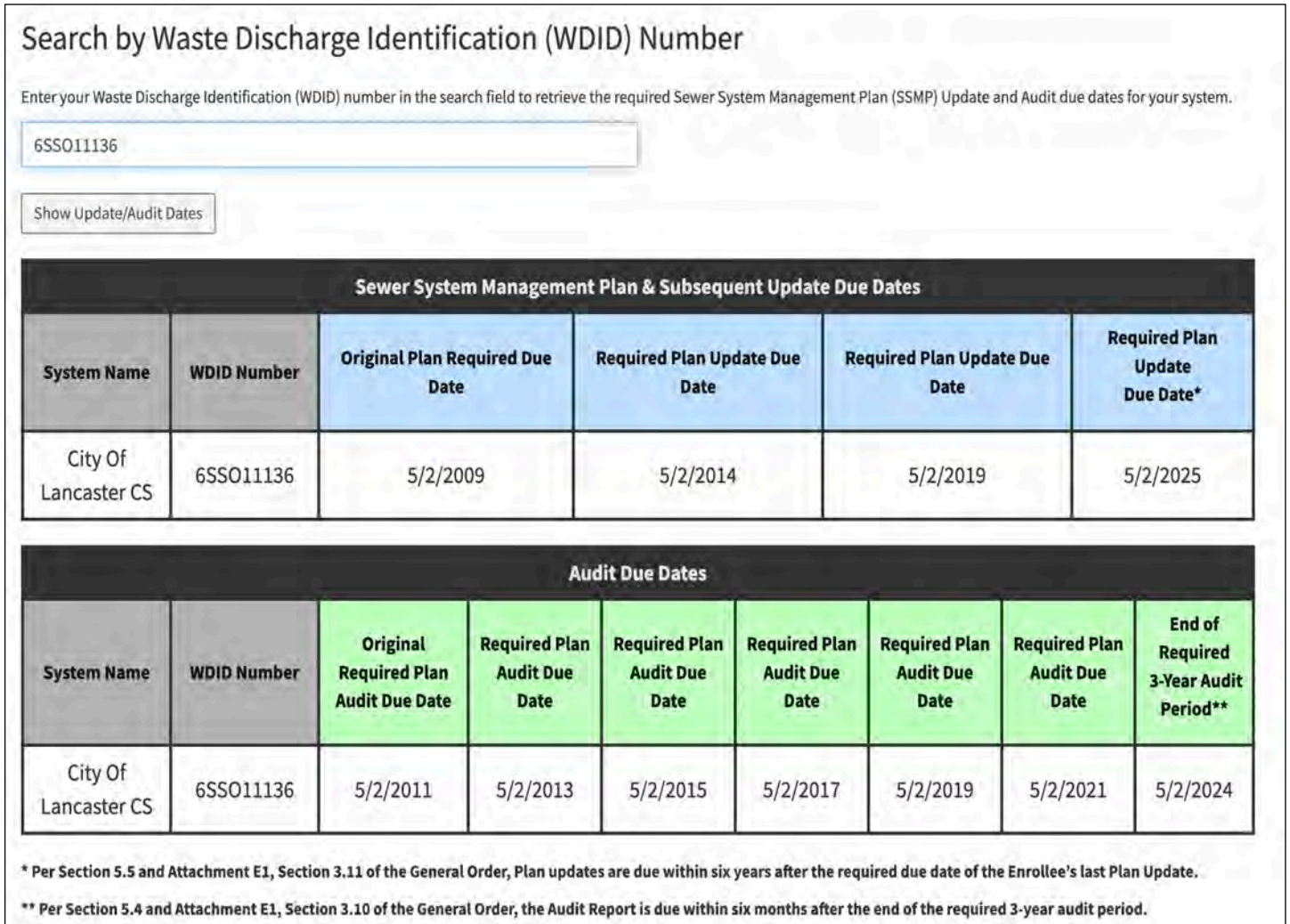


Figure 3 - SSMP and SSSM Audit required due dates for the City

### City Spill Performance

This section provides an overview to showcase City spill performance information, including trends and benchmarks to allow a comparison of the City’s performance against other collection system agencies within the Lahontan Regional Board area and State. Numerous data sets and visualizations were created (see Figures 4-5 below and Appendix 2 for more additional detailed data visualizations generated with Microsoft Power BI). As displayed in many of the visualizations, the City’s spill rates and volumes discharged during the Audit period were consistently lower than many other sanitary sewer system agencies within the Lahontan Regional Board area (see below).

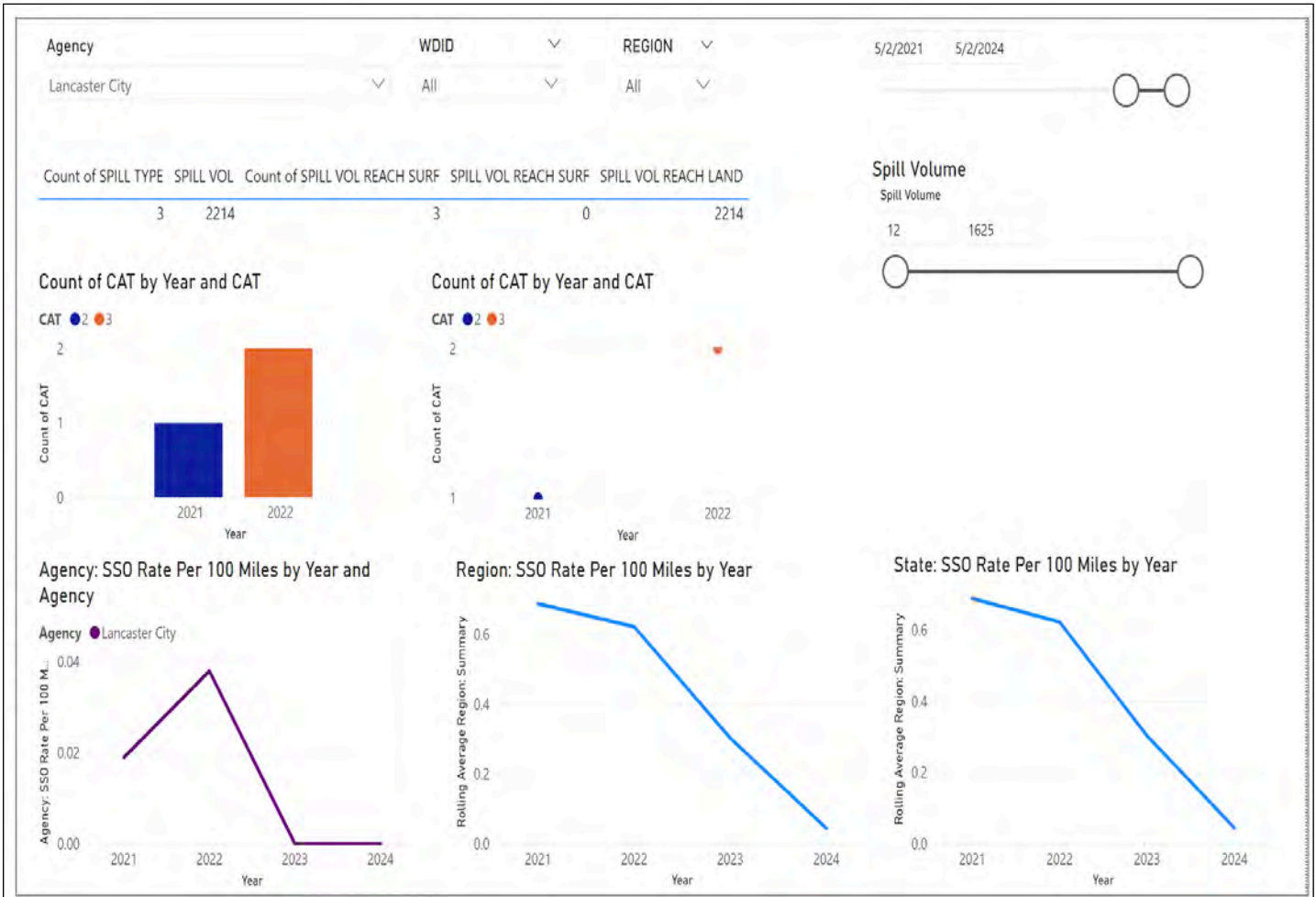


Figure 4 - City spill data dashboard during Audit period

Executive Summary

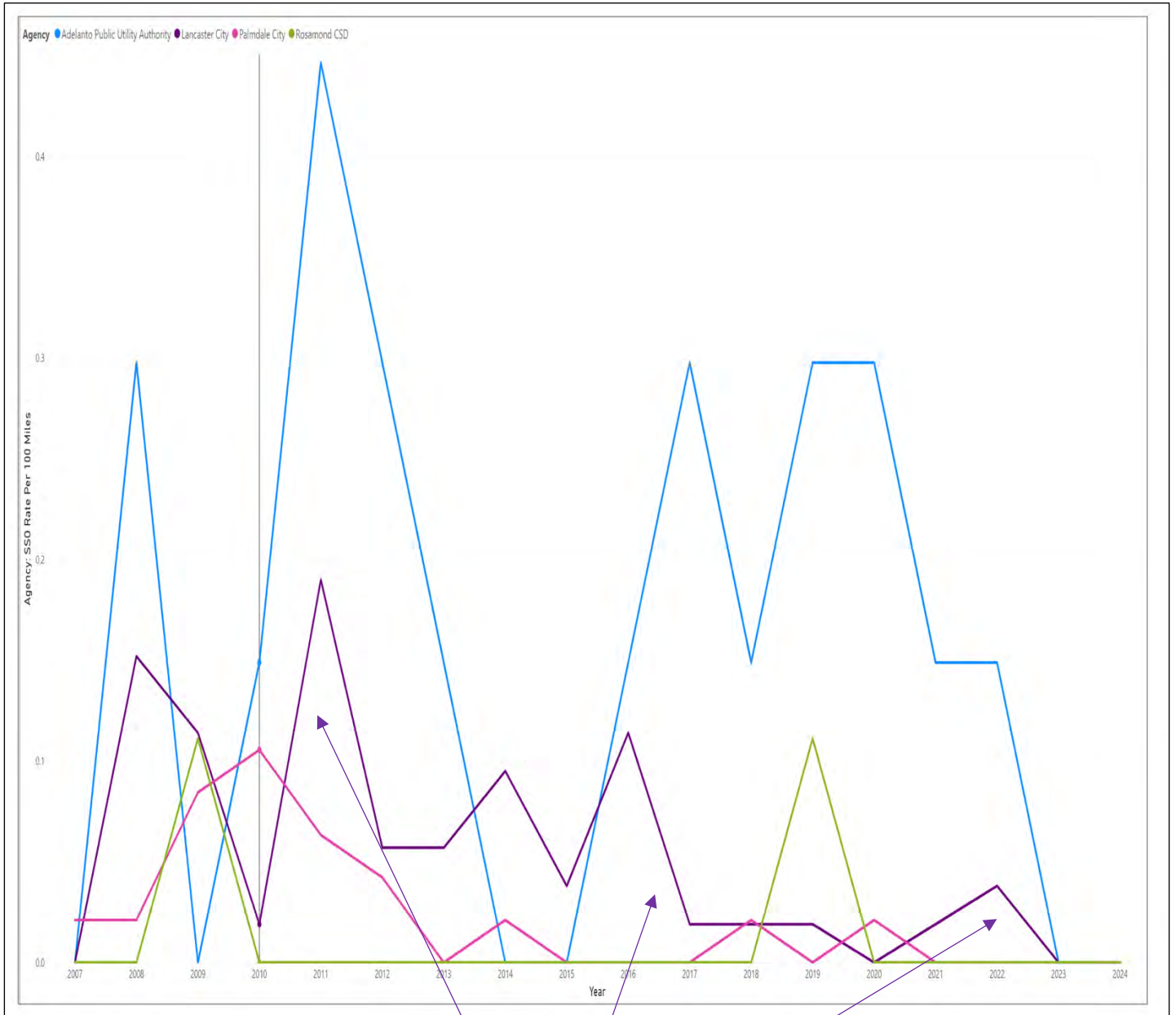


Figure 5 - City Spill Rates (# of spills/100 miles) compared with other agencies during Audit period

City spill rates trend line

**SSMP Audit Findings**

This section provides a high-level summary of the SSMP Audit findings (see Tables 2 and 3 below) to be incorporated into the City’s next SSMP Update due on or before 5/2/2025. Table 2 below provides a summary of Audit Findings for the Reissued WDR Attachments.

Table 2: Summary of City SSMP Audit Findings (Reissued WDR, ATTACHMENTS)

SSMP AUDIT FINDINGS (ATTACHMENTS)				
Requirements	Violations?	Areas of Concern?	Findings/Recommendations	
Att. D-1 Goal & Intro	No	Yes	✓ Improvements to existing SSMP Change Log – previous Audit finding	
Att. D-2 Organization	No	No	✓ Full compliance	
Att. D-3 Legal Authority	No	No	✓ Full compliance	
Att. D-4 O/M Program	No	Yes	✓ See Element 4 below for details	
Att. D-5 Design and Performance	No	No	✓ Full compliance	
Att. D-6 SERP	No	Yes	✓ Improvements to implementation including staff training/demonstration of competency ✓ Improvements to spill records	
Att. D-7 Pipe Blockage Control Program	No	Yes	✓ Improvements for assessing FOG program effectiveness – previous Audit finding	
Att. D-8 SECAP	No	Yes	✓ Improvements to budgets, spending, scheduling, and project completion with capital improvement program – previous Audit finding	
Att. D-9 Monitoring, Measurement	No	No	✓ Full compliance	
Att. D-10 Audits	No	No	✓ Full compliance	
Att. D-11 Communications	No	No	✓ Full compliance	
Att. E1 Notification, Monitoring, Reporting, Records	No	Yes	✓ See SERP above	

Table 3 below provides a summary of Audit Findings for the Reissued WDR Specifications.

Table 3: Summary of SSMP Audit Findings (Reissued WDR, SPECIFICATIONS)

SSMP AUDIT FINDINGS (SPECIFICATIONS)				
Requirements	Violations? <sup>3</sup>	Areas of Concern? <sup>4</sup>	Findings/Recommendations	
Spec. 5.1	Designation of LRO	No	No	✓ Improve LRO and Data Submitter training
Spec. 5.2	SSMP Development, Implementation	No	No	✓ Full compliance
Spec. 5.3	SSMP Updates	No	No	✓ Full compliance
Spec. 5.4	SSMP Audits	No	No	✓ Full compliance
Spec. 5.6	System Resilience	No	No	✓ Full compliance
Spec. 5.10	Resources	No	No	✓ Full compliance
Spec. 5.11	Performance Analysis	No	No	✓ Full compliance
Spec. 5.12	SERP	No	Yes	✓ Additional improvements with staff SERP training and demonstration of competency
Spec. 5.13	Notif, Monitoring, Reporting, Records	No	Yes	✓ Additional improvements to ensuring large spill monitoring program – previous Audit finding
Spec. 5.14	Notifications (private spills)	No	No	✓ Full compliance
Spec. 5.15	Failure to report	No	No	✓ Full compliance
Spec. 5.19	Proper O/M	No	No	✓ Full compliance

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<sup>3</sup> V (Violation of [REISSUED WDR](#))

<sup>4</sup> AOC (Area of Concern with [REISSUED WDR](#))

## Conclusions

The SSMP Audit completed by Fischer Compliance LLC in collaboration with City management shed light on many existing successful work programs in place. When comparing the City spill data/metrics performance with other collection systems in the Lahontan Regional Water Board area and throughout the State, the City performs near the top.

Detailed Auditing procedures incorporating review of questionnaires, the City's existing 2010 SSMP, interviews and other data were relied on for generating the detailed Audit findings for documenting the City's SSMP compliance, implementation, and effectiveness. Several recommendations along with an implementation plan/schedule were also generated to help the City get a jump start on updating its 2019 SSMP months ahead of schedule before its next required update due on or before 5/2/2025.

The Audit further revealed several areas of concern providing an advantage to help prepare the City for future regulatory compliance inspections and improve SSMP effectiveness. The audit results also help the City reflect on additional ways to improve its existing work programs and spill reduction measures including additional examples for measuring effectiveness of each SSMP element including Key performance indicators (KPIs) and additional available industry standard guidance for SSMPs posted on the State Water Board's Spill Reduction website.

## PART 2 (Detailed SSMP Audit Findings)

This section provides detailed information including detailed SSMP Audit findings and recommendations. The procedures employed included evaluating the City’s sewer programs against each required SSMP element required in the Reissued WDR. Requirements are presented at the beginning for each element along with an analysis of City compliance and implementation.

Additional information for helping City managers measure SSMP effectiveness and provide resilience are also included for each SSMP element in this section. This information provides a strong foundation to help the City with updating its next SSMP, due by Nov 2, 2024. Each section ends with a checklist of common potential violations/areas and a checklist of findings including determination of compliance.

### Element 1 – Goal And Introduction

#### 1.1 Regulatory Context

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

#### 1.2 SSMP Update Schedule

“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.”

#### 1.3 Sewer System Asset Overview

“The City Sewer System Management Plan must have an Introduction section to provide a description of the City-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 length in miles, length of gravity mainlines, length 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 percent of residential, commercial, and industrial service connections.
- Unique service boundary conditions and challenge(s).
- 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.”



ELEMENT 1 – GOAL AND INTRODUCTION

FINDINGS (Element 1: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City is implementing these requirements with its existing SSMP.</li> <li>The City should improve its SSMP Change Log (previous Audit findings)</li> <li>The City could also consider developing customized Key Performance Indicators (KPIs) for each of the goals listed in this section for helping measure effectiveness and supporting future SSMP Auditing tasks.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>Has the schedule for conducting audits been adhered to?</li> <li>Has the schedule for updating the Sewer System Management Plan been adhered to?</li> <li>Are established milestones being monitored?</li> <li>Is the sewer system management program description up to date?</li> <li>Have audits been performed on schedule? Measured by review of completion for audits against required timelines.</li> <li>Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)? Measured by review of historic local board adoption dates against required timelines.</li> <li>Are established milestones being monitored?</li> <li>Are the system maps up to date?</li> <li>Is asset data kept in the computerized maintenance management system, GIS, etc., programs up to date?</li> <li>Are updates to the maps performed in a timely manner?</li> </ol> </li> </ul>

ELEMENT 1 – GOAL AND INTRODUCTION

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>Create a work order report for auditing open work orders and assets any repeat spill locations.</li> <li>Implement a formal schedule to ensure all WDR compliance deadlines are logged into management calendars.</li> <li>Ensure cross-training for data submitters to ensure more than one staff member can collect/manage all required spill data and meet all required deadlines specified in Attachment E1.</li> </ol> </li> </ul>

FINDINGS (Element 1: WDR Violation/Areas of Concern Checklist<sup>5</sup>)

• Potential Violations	• Potential Violations?	• Potential Areas of Concern?	• City In Compliance?
✓ Failure to identify appropriate goals	• No	• No	• Yes
✓ Failure to update Sewer System Management Plan sub-elements	• No	• No	• Yes
✓ Failure to establish process to ensure public has access/input to Sewer System Management Plan	• No	• No	• Yes
✓ Failure to complete appropriate Sewer System Management Plan audit	• No	• No	• Yes
✓ Failure to measure effectiveness and progress	• No	• No	• Yes
✓ Failure to develop and implement procedures for updating sewer maps	• No	• No	• Yes
✓ Failure to provide appropriate narrative descriptions describing procedures for prioritization of system repairs and maintenance to prevent spills.	• No	• No	• Yes
✓ Failure to describe technologies and practices to reduce spills	• No	• No	• Yes

<sup>5</sup> See SSMP Development Guide, available for download on the State Water Board’s Spill Reduction Website, available at the following link: [https://www.waterboards.ca.gov/water\\_issues/programs/sso/](https://www.waterboards.ca.gov/water_issues/programs/sso/)

## Element 2 – Organization

### REQUIREMENTS<sup>1</sup>

“The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organizational chart of other 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 elements;
- Organizational lines of authority.
- 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 City, and State Office of Emergency Services).”

ELEMENT 2 –ORGANIZATION

FINDINGS (Element 2: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City is implementing these requirements with its existing SSMP.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>Have there been instances when a service call for a spill was not properly routed to response personnel?</li> <li>Was all spill response activity documented and forwarded to the LRO?</li> <li>Have there been any changes in assigned responsibilities for implementing the Sewer System Management Plan?</li> <li>Is there a process in place to ensure all contact information remains up to date?</li> <li>Is there a process in place to ensure the organizational chart up to date?</li> </ol> </li> </ul>
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>Ensuring more than one person is capable and responsible for specific duties for Sewer System Management Plan implementation, e.g. back-up personnel.</li> <li>Designation of more than one LRO to help ensure full and continuous coverage of duties.</li> <li>Ensuring more than one staff member can implement and be responsible for specific Sewer System Management Plan elements.</li> <li>Periodically review contact info. to ensure it is up to date.</li> </ol> </li> </ul>

ELEMENT 2 –ORGANIZATION

FINDINGS (Element 2: Common WDR Violations/Areas of Concern Evaluation)

<ul style="list-style-type: none"> <li>Potential Violations</li> </ul>	<ul style="list-style-type: none"> <li>Potential Violations?</li> </ul>	<ul style="list-style-type: none"> <li>Potential Areas of Concern?</li> </ul>	<ul style="list-style-type: none"> <li>City In Compliance?</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to properly secure Legally Responsible Official with appropriate training and experience.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to establish and update all related necessary responsible staff and lines of authority.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to establish and update City chain of communication for reporting spills.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>

## Element 3 – Legal Authority

### REQUIREMENTS<sup>6</sup>

“The City Sewer System Management 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.”

- “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 can 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 violation(s) of ordinances, service agreements, or other legally binding procedures.”
- “Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.”

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<sup>6</sup> See Attachment D-3 of [Reissued WDR](#) (page D-4)

FINDINGS (Element 3: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City complies with this element.</li> <li>• The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City is implementing these requirements with its existing SSMP.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Are the City codes and ordinances adequate for fulfilling the Sewer System Management Plan legal requirements?</li> <li>2. Have there been instances when the code or ordinance did not address a need or circumstance?</li> </ol> </li> </ul>
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Monitor performance of ordinances, codes, and agreements for deficiencies and omissions.</li> <li>2. Perform periodic review of ordinances, codes, and service agreements.</li> <li>3. Stay abreast of industry trends and local ordinances that affect operations.</li> <li>4. Check to ensure codes and ordinances periodically reviewed.</li> </ol> </li> </ul>

ELEMENT 4 – OPERATIONS & MAINTENANCE

FINDINGS (Element 3: Common WDR Violations/Areas of Concern Evaluation)

<ul style="list-style-type: none"> <li>Potential Violations</li> </ul>	<ul style="list-style-type: none"> <li>Potential Violations?</li> </ul>	<ul style="list-style-type: none"> <li>Potential Areas of Concern?</li> </ul>	<ul style="list-style-type: none"> <li>City In Compliance?</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to establish proper codes, standards, legal agreements, and procedures to ensure conformance to requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to periodically review codes, standards, legal agreements, and procedures to ensure conformance to requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>



## Element 4 – Operations and Maintenance Program

### 4.1 Updated Map of Sewer System

#### REQUIREMENTS<sup>7</sup>

“The Plan must include the items listed below that are appropriate and applicable to the Enrollee’s system.

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.”

### 4.2 Preventive Operation and Maintenance Activities

#### REQUIREMENTS<sup>1</sup>

“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
- 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 the data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure.”

### 4.3 Training

#### REQUIREMENTS

“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.”

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<sup>7</sup> See Attachment D-4.1 of [Reissued WDR](#) (page D-4)

## 4.4 Equipment Inventory

### REQUIREMENTS<sup>1</sup>

- “An inventory of sewer system equipment, including identification of critical replacement/spare parts.”

### FINDINGS (Element 4: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City should provide additional information detailing its plans/schedule for completing a new force main condition assessment project anticipated for short-term implementation (see <b>AOC A3, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
		<ul style="list-style-type: none"> <li>• The inspection revealed the City should further improve its existing its critical parts lists/inventory (see <b>AOC A5, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
		<ul style="list-style-type: none"> <li>• The inspection revealed the need for possibly evaluating the need for additional cleaning staff resources (see <b>AOC B2, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
		<ul style="list-style-type: none"> <li>• The inspection revealed the need for further improving the City’s existing records/documentation for lift station inspections and alarm testing to ensure this information adequately explained and is easily understood by compliance inspectors; the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
		<ul style="list-style-type: none"> <li>• The inspection revealed the need for further improving field staff training records/documentation (existing documentation only includes signature sheets without details of the training content, etc.); the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
		<ul style="list-style-type: none"> <li>• The inspection revealed the need to further improve documentation showcasing testing of the backup generator at its pump station, including providing details where electronic testing records are available for inspectors; the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
		<ul style="list-style-type: none"> <li>• The inspection revealed the need to further improve documentation explaining the City’s existing Hot Spot cleaning program; the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
		<ul style="list-style-type: none"> <li>• The inspection revealed the need to consider development of a stand-alone manhole inspection form to document details of completed work.</li> </ul>

ELEMENT 4 – OPERATIONS & MAINTENANCE

EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update             <ol style="list-style-type: none"> <li>1. Were all map updates completed in a timely manner?</li> <li>2. Are staff trained for providing map update information?</li> <li>3. Are newly installed assets incorporated into maps?</li> <li>4. Are City maintenance, operations, engineering work orders periodically reviewed for completeness?</li> <li>5. Does the City monitor “open” or “overdue” work orders?</li> <li>6. Are inspection and maintenance activities reducing the number and volume of spills?</li> <li>7. Is maintenance work being completed as scheduled?</li> <li>8. Are inspections of pipes, manholes, and lift completed?</li> <li>9. Does the City have a proactive root control program?</li> <li>10. Has all training been completed as scheduled?</li> <li>11. Have consistent training records been maintained?</li> <li>12. Have staff demonstrated ability/knowledge after trainings?</li> <li>13. Have contractors received, at a minimum, direction for 1) reporting spills, containment, securing sites?</li> <li>14. Has the inventory list been audited as scheduled?</li> <li>15. Have any inventory deficiencies or omissions been discovered?</li> </ol> </li> <li>• Has the City experienced failures inhibiting any spill responses?</li> </ul>
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ELEMENT 4 – OPERATIONS & MAINTENANCE

RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update             <ol style="list-style-type: none"> <li>1. Develop an SOP for updating maps when errors are discovered.</li> <li>2. Develop and use forms (paper or electronic) for data collection to help ensure all pertinent information is consistently collected.</li> <li>3. Periodically evaluate inspection intervals to help ensure they are optimized.</li> <li>4. Require staff to demonstrate ability and/or knowledge for all training activities.</li> <li>5. Monitor equipment and critical spare parts usage for and trends.</li> </ol> </li> </ul>
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FINDINGS (Element 4: Common WDR Violations/Areas of Concern Evaluation)

• Potential Violations	• Potential Violations?	• Potential Areas of Concern?	• City In Compliance?
✓ Failure to establish process to ensure sewer maps are up to date.	• No	• No	• Yes
✓ Failure to establish and review required maintenance program activities (CCTV, inspections, etc.)	• No	• No	• Yes
✓ Failure to establish adequate training program for staff and contractors.	• No	• No	• Yes
✓ Failure to establish equipment inventory including identification of critical spare parts.	• No	• No	• Yes

## Element 5 – Design and Performance Provisions

### 5.1 Updated Design Criteria and Construction Standards

REQUIREMENTS<sup>8</sup>

“The Plan must include the following items as appropriate and applicable to the Enrollee’s system”.

- “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.”

### 5.2 Procedures and Standards

REQUIREMENTS<sup>1</sup>

- “Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.”

FINDINGS (Element 5: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City is implementing these requirements with its existing SSMP.</li> </ul>

<sup>8</sup> See Attachment D-5.1 of [Reissued WDR](#) (page D-5)

ELEMENT 5 –DESIGN/PERFORMANCE PROVISIONS

EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update             <ol style="list-style-type: none"> <li>1. Does the City implement its current design and construction standards, specifications, and inspection procedures?</li> <li>2. Does the City annually review design and construction standards, specifications, and inspection procedures to ensure conformance to requirements?</li> <li>3. Does the City have a review process for its standards and procedures?</li> <li>4. Were any design or installation deficiencies found during warranty inspections?</li> <li>5. Are hydraulic model findings included in the design process?</li> <li>6. Does the City stay abreast of industry design standards?</li> </ol> </li> </ul>
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update             <ol style="list-style-type: none"> <li>1. Staying abreast of industry trends and standards.</li> <li>2. Performing warranty inspections of newly installed or repaired assets to evaluate design and installation practices.</li> <li>3. Evaluating as-built changes for trends and areas for design and performance improvements.</li> </ol> </li> </ul>

FINDINGS (Element 5: Common WDR Violations/Areas of Concern Evaluation)

• Potential Violations	• Potential Violations?	• Areas of Concern?	• City In Compliance?
✓ Failure to establish, implement, and maintain appropriate sewer standards and procedures for inspections, and testing.	• No	• No	• Yes
✓ Failure to enforce instances of noncompliance.	• No	• No	• Yes

## Element 6 – Spill Emergency Response Plan

### REQUIREMENTS<sup>9</sup>

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 meet all the following.

- *“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 interagency 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 Guidance of spill response activities.*
- *Document and report spill events as required in this General Order.*
- *Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.”*

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<sup>9</sup> See Attachment D-6 of [Reissued WDR](#) (page D-6)

ELEMENT 6 – SPILL EMERGENCY RESEPONSE PLAN

FINDINGS (Element 6: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City overall complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element (including implementation findings below), required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City should further improve implementation of its SERP including field data collection/procedures/forms and improving operator training and adherence to established procedures (see <b>AOC A1, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> <li>The inspection revealed the City should further improve implementation of its SERP with additional procedures and documentation for training activities for pump station bypassing (see <b>AOC A2, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> <li>The inspection revealed the City should further improve implementation of its SERP by improving overall operator familiarity and exposure to procedures and related WDR elements critical for operations staff (see <b>AOC B1, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City should further improve its existing procedures for field data collection for spills (see <b>AOC A8, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> <li>To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>Check to ensure the City is implementing all recommendations for spill emergency response plans incorporated in SSMP Guidance Manual (see pages 35-39)</li> <li>Does the agency implement an effective Spill Emergency Response Plan? Measured by quarterly review, training/practice drills, and completion of field data collection forms for conforming with Attachment E1 requirements.</li> </ol> </li> </ul> <p style="text-align: center;">-</p>



ELEMENT 6 – SPILL EMERGENCY RESEPNSE PLAN

RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update             <ol style="list-style-type: none"> <li>1. Provide training on a regular basis for all spill response staff. Training should include:                 <ul style="list-style-type: none"> <li>• Determining Spill Start Time</li> <li>• Determining spill volume and volume recovered.</li> <li>• Data Collection (forms)</li> <li>• Containment and clean up.</li> <li>• CIWQS Data Submitting</li> <li>• Develop a training plan for contracted services.</li> <li>• Periodically review post-spill assessments for trends and areas for improvement.</li> </ul> </li> </ol> </li> </ul>
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FINDINGS (Element 6: Common WDR Violations/Areas of Concern Evaluation)

• Potential Violations	• Potential Violations?	• Areas of Concern?	• City In Compliance?
✓ Failure to develop and implement a Spill Emergency Response Plan that meets all requirements.	• No	• No	• Yes
✓ Failure to test/evaluate emergency procedures during including deploying contracted services where necessary.	• No	• No	• Yes
✓ Failure to ensure supply of adequate critical/identified spare parts/equipment prior to spills.	• No	• No	• Yes
✓ Failure to properly notify appropriate outside agencies/officials.	• No	• No	• Yes
✓ Failure to comply with Monthly No Spill Certifications	• No	• No	• Yes

## Element 7 – Sewer Pipe Blockage Control Program

### REQUIREMENTS<sup>10</sup>

“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 prohibits discharges to the system and identifies 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.”

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<sup>10</sup> See Attachment D-7 of [Reissued WDR](#) (page D-7)

FINDINGS (Element 7: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection (and previous SSMP Audit) revealed the City should further improve assessing resources and effectiveness of its Fats, Oils, and Grease (FOG) program (see <b>AOC A6, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>Have there been any blockages/spills from any identified problem area?</li> <li>Is the agency receiving feedback on public outreach efforts?</li> <li>Is the debris and other sewage solids collected during cleaning activities being disposed of appropriately?</li> <li>Does the agency have a plan and schedule for inspection of grease producing facilities? Was the schedule adhered to?</li> <li>Have there been spills due to excessive fats, oil, or grease in the system?</li> <li>Are Source Control staff included in the plan check process?</li> </ol> </li> </ul>

ELEMENT 7 – SEWER PIPE BLOCKAGE CONTROL PROGRAM

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Inspect assets directly downstream of grease producing businesses to ensure source control is effective.</li> <li>2. Develop outreach doorhangers or flyers to perform targeted outreach when discoveries are made in the field.</li> <li>3. Perform regular assessments of system assets to monitor performance.</li> <li>4. Establish a QA/QA process for evaluating pipe cleaning effectiveness.</li> </ol> </li> </ul>

FINDINGS (Element 7: Common WDR Violations/Areas of Concern Evaluation)

• Potential Violations	• Potential Violations?	• Areas of Concern?	• City In Compliance?
✓ Failure to identify appropriate needs for pipe blockage program.	• No	• No	• Yes
✓ Failure to ensure adequate pipe blockage control enforcement authority.	• No	• No	• Yes
✓ Failure to establish residential FOG outreach	• No	• No	• Yes
✓ Failure to enforce requirements for instances of noncompliance.	• No	• No	• Yes

## Element 8 – System Evaluation, Capacity Assurance, Capital Improvements

### REQUIREMENTS

“The Plan must include procedures and activities for

- Routine evaluation and guidance of system conditions,
- Capacity guidance and design criteria.
- Prioritization of corrective actions.
- Capital improvement plan.”

### 8.1. System Evaluation and Condition Guidance

#### REQUIREMENTS<sup>11</sup>

“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 Guidance of system areas that:
  - Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies.
  - Are 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 methods.
- Utilize observations/Audit Findings/Recommendations of system conditions that 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 Guidance inspections and activities,
- Identify system assets vulnerable to direct and indirect 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.”

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<sup>11</sup> See Attachment D-8.1 of [Reissued WDR](#) (pages D-7 and D-8)

FINDINGS (Element 8: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>The inspection (and previous SSMP Audit) revealed the City should consider providing additional details to explain its ongoing capital improvement projects, related maintenance records, and a plan/schedule for logging all projects and funding sources (see <b>AOC A4, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> <li>The inspection revealed the City should further have written justification for its ongoing inspection (CCTV) intervals in place (see <b>AOC A7, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>Number of capacity-related spills or surcharge condition during the audit period?</li> <li>Has the system responded to rain events as indicated by the hydraulic model?</li> <li>Has there been any changes to zoning designations (residential, commercial, industrial)?</li> <li>Rain event trends: Has there been changes in rain event occurrences, intensity, and duration?</li> <li>Has the agency’s capital improvement plan been adhered to?</li> <li>Is there an annual review of the Capital Improvement Plan by all necessary individuals?</li> <li>Has the City adhered to its system evaluation/condition assessment efforts? Measured by annual review and update of system inspections/evaluations procedures.</li> <li>Has the City adhered to its prioritization/corrective actions for sewer repair and capacity improvement projects? Measured by annual review and agency prioritization/corrective actions procedures.</li> </ol> </li> </ul>

FINDINGS (Element 8: Common WDR Violations/Areas of Concern Evaluation Evaluation)

<ul style="list-style-type: none"> <li>Potential Violations</li> </ul>	<ul style="list-style-type: none"> <li>Potential Violations?</li> </ul>	<ul style="list-style-type: none"> <li>Areas of Concern?</li> </ul>	<ul style="list-style-type: none"> <li>City In Compliance?</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to develop and implement system evaluation, capacity assurance, and capital improvement programs.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to identify sections holding high degree of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to identify sections located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to identify assets within the vicinity of receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to develop and implement capital improvement plan (CIP) for necessary sewer system repairs and improvements (short term and long-term).</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>

## Element 9 – Monitoring, Measurement, Program Modifications

### REQUIREMENTS<sup>12</sup>

“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.”

### FINDINGS (Element 9: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City is implementing these requirements with its existing SSMP.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update                             <ol style="list-style-type: none"> <li>1. Are trends being monitored and corrective action taken as necessary?</li> <li>2. Have Key Performance Indicators been developed to measure the effectiveness of each Sewer System Management Plan element?</li> <li>3. Has a plan and schedule been established to address audit findings/deficiencies?</li> <li>4. Have changes been made to work programs and procedures because of monitoring efforts?</li> </ol> </li> </ul>

<sup>12</sup> See Attachment D-9 of [Reissued WDR](#) (page D-9)



ELEMENT 9 – MONITORING, MEASUREMENT, PROGRAM MODIFICATIONS

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Develop key performance indicators to measure effectiveness of the Sewer System Management Plan.</li> <li>2. Perform periodic reviews of the Sewer System Management Plan to help ensure the plan is being properly implemented.</li> <li>3. Develop and adhere to a timeline to correct deficiencies found during the audit process.</li> <li>4. Periodically evaluate work programs to help ensure effectiveness.</li> </ol> </li> </ul>

FINDINGS (Element 9: Common WDR Violations/Areas of Concern Evaluation)

• Potential Violations	• Potential Violations	• Areas of Concern	• City in Compliance?
<ul style="list-style-type: none"> <li>✓ Failure to collect/maintain and evaluate relevant data for monitoring, measuring, and assessing preventive maintenance program effectiveness.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to update/modify agency Sewer System Management Plan based on results from audits and evaluation of data required for this element.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>

## Element 10 – Internal Audits

### REQUIREMENTS<sup>13</sup>

“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.”

- Specifications 5.4 (Sewer System Management Plan Audits)

“The Enrollee shall conduct an internal audit of its Sewer System Management Plan, and implementation of its Plan, at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the Enrollee’s last required audit period. Within six months after the end of the required 3-year audit period, the Legally Responsible Official shall submit an audit report into the online CIWQS Sanitary Sewer System Database per the requirements in section 3.10 (Sewer System Management Plan Audit Reporting Requirements) of Attachment E1 of this General Order. Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff. The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills. The Enrollee’s sewer system operators must be involved in completing the audit. At minimum, the audit must:

- Evaluate the implementation and effectiveness of the Enrollee’s Sewer System Management Plan in preventing spills.
- Evaluate the Enrollee’s compliance with this General Order.
- Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and
- Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.
- The Enrollee shall submit a complete audit report that includes:
  - Audit findings and recommended corrective actions.
  - A statement that sewer system operators’ input on the audit findings has been considered; and
  - A proposed schedule for the Enrollee to address the identified deficiencies.”

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<sup>13</sup> See Attachment D-10 of [Reissued WDR](#) (page D-10)

ELEMENT 10 – SSMP AUDITS

FINDINGS (Element 10: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City should ensure its last SSMP Audit findings are addressed (see <b>AOC, A9, Appendix 1</b>); the City SSMP and Change Log should be updated once improvements are implemented.</li> <li>• The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City is implementing these requirements with its existing SSMP.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Have audits been performed as required?</li> <li>2. Have the audits assessed compliance, implementation, and effectiveness?</li> <li>3. Have deficiencies been identified?</li> <li>4. Has a plan and schedule to rectify the deficiencies been established?</li> </ol> </li> </ul>
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Periodically evaluate key performance indicators to assess effectiveness of each Sewer System Management Plan element.</li> <li>2. Evaluate previous audit to ensure deficiencies have been rectified.</li> <li>3. Calendar the audit due dates and complete the audit on time.</li> <li>4. Prepare for announced/unannounced compliance inspections by regulators and by proactive with preparing required Audits by completing the State Water Board Pre-Inspection Questionnaire (see Appendix 1).</li> </ol> </li> </ul>

ELEMENT 10 – SSMP AUDITS

FINDINGS (Element 10: Common WDR Violations/Areas of Concern Evaluation)

<ul style="list-style-type: none"> <li>Potential Violations</li> </ul>	<ul style="list-style-type: none"> <li>Potential Violations</li> </ul>	<ul style="list-style-type: none"> <li>Areas of Concern</li> </ul>	<ul style="list-style-type: none"> <li>City in Compliance?</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to conduct routine Sewer System Management Plan audits.</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to measure Sewer System Management Plan element effectiveness (a simple checklist will not fulfill this obligation).</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>
<ul style="list-style-type: none"> <li>✓ Failure to implement identified deficiencies/recommendations and commit to new enhancements via a plan/schedule (short and long-term).</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• No</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> </ul>

## Element 11 – Communication Program

### REQUIREMENTS<sup>14</sup>

“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, 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.”

### FINDINGS (Element 11: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City complies with this element. The City should utilize its SSMP Audit implementation plan/schedule (see Appendix 3) to support updating this element, required on or before May 2, 2025.</li> </ul>
IMPLEMENTATION	2019 SSMP	<ul style="list-style-type: none"> <li>• The inspection revealed the City is implementing these requirements with its existing SSMP.</li> </ul>
EFFECTIVENESS	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Does the agency place all Sewer System Management Plan action items on the agenda for regular counsel/board meetings?</li> <li>2. Does the agency have signage, or other means, readily available to notify the public of environmental or public risk factors related to a sewage spill?</li> <li>3. Does the agency regularly communicate with other systems connected to the system?</li> <li>4. Was the public afforded the opportunity to provide input as the program was being implemented?</li> <li>5. Does the agency perform outreach to residential customers?</li> </ol> </li> </ul>
RESILIENCE	2019 SSMP	<ul style="list-style-type: none"> <li>• To ensure alignment with <a href="#">available industry standard guidance</a>, the City should check/verify the following data for inclusion in its next required SSMP update               <ol style="list-style-type: none"> <li>1. Use the Sewer System Management Plan as a tool to communicate to the public how the agency is managing the system.</li> <li>2. Maintain a consistent presence in the service area by attending community events or issuing periodic newsletters or other communications to the public.</li> <li>3. Make it clear and easy for the public to contact the agency.</li> </ol> </li> </ul>

<sup>14</sup> See Attachment D-11 of [Reissued WDR](#) (page D-10)

ELEMENT 11 – COMMUNICATION PROGRAM

FINDINGS (Element 11: Common WDR Violations/Areas of Concern Evaluation)

• Potential Violations	• Potential Violations	• Areas of Concern	• City in Compliance?
✓ Failure to develop and implement a public communication program, especially during emergencies.	• No	• No	• Yes
✓ Failure to solicit input on Sewer System Management Plan content.	• No	• No	• Yes
✓ Failure to communicate with owners/operators of sewer system(s) connected to the agency’s sewer system.	• No	• No	• Yes

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## **LIST OF APPENDICIES**

- APPENDIX 1 – Compliance Evaluation Inspection (CEI) Report
- APPENDIX 2 – City Spill Performance Benchmark Report
- APPENDIX 3 – City SSMP Audit Implementation Plan and Schedule (2024-2026)
- APPENDIX 4 – City List of Spills (2007-2024)



# COMPLIANCE EVALUATION INSPECTION REPORT

Prepared by:



Sanitary Sewer  
Collection System  
WDID=6SSO11136



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## 1. Introduction

On May 8, 2024, James Fischer (Fischer Compliance LLC) and Sam Rose (Sam Rose Consulting) conducted a Compliance Evaluation Inspection (CEI) for the City of Lancaster (City) to evaluate compliance with the Statewide Sanitary Sewer Systems General Order ([Order No. 2022-0103-DWQ](#)), hereafter “Reissued WDR<sup>1</sup>”.

FACILITY INSPECTED:	INSPECTED BY:  James Fischer, P.E. NPDES Compliance Inspector <sup>2</sup> Principal, FISCHER COMPLIANCE, LLC  <i>James Fischer</i> Date: 5/8/2024	
SANITARY SEWER COLLECTION SYSTEM (WASTEWATER)	Waste Discharge ID (WDID): 6SSO11136	
Water Quality Order(s)	<b>2022-0103-DWQ (Reissued WDR)</b>	
Regional Water Boards	6V	
County	Los Angeles	
Population/Area	163,950	
Miles of Sewers (gravity)	439	
Miles of Sewers (force mains)	0.5	
Sewer Connections (#)	36,248	
Lift/Pump Stations (#)	1	
Above pipelines (#)	0	
Air release valves (force mains, #)	0	
Sewer siphons (#)	0	
CWEA Maintenance Certifications (#)	16	
Sewer lower later responsibility (Y/N)	N	
Final wastewater disposal	LA County Sanitation District WWTP WDID #6SSO011393	
FACILITY REPRESENTATIVE	TITLE	CONTACT
Bruce Katz	Assistant Director, Utility Services	(661) 723-6000
Ben Stewart	Supervisor	(661) 723-6000

<sup>1</sup> See [https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2022/wqo\\_2022-0103-dwq.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0103-dwq.pdf)

<sup>2</sup> Credentialed, U.S EPA (2017)

## 2. Inspection Summary

The inspection incorporated both pre-inspection meetings for comprehensively assessing the City's SSMP compliance, implementation, and effectiveness with the Reissued WDR (see Tables 1-2 below). This information provides a key advantage for helping City managers proactively reflect on ways for further improving its and implementing necessary adjustments to existing programs for preparing for its required SSMP Audit due to be uploaded to CIWQS<sup>3</sup> by November 2, 2024.

A summary of the overall inspection areas assessed and scores for the City are provided in Table 1 below.

### **Table 1 – Inspection Summary**

## 3. Inspection Procedures

The inspection incorporated the following procedures:

1. Desktop Review (review of City SSMP, previous regional board enforcement, benchmarks)
2. Pre-Inspection Meetings
3. Data Review (City answers to completed SWRCB Questionnaire, spill reports, work program review)
4. Compliance Evaluation Inspection
5. Post-Inspection Review

## 4. Inspection Tasks

The inspection incorporated several key tasks for further evaluating the City's SSMP compliance, implementation, and effectiveness with the Reissued WDR (see Table 2 below). This included both interviews with City management and field staff to help assess the City's overall implementation of its Sewer System Management Plan (SSMP) to be incorporated into the SSMP Audit report. A post-inspection assessment is also included (see section 9) incorporating specific responses from the City to each of the inspection findings.

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<sup>3</sup> California Integrated Water Quality System (CIWQS), available at:

[https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso\\_operation\\_report](https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_operation_report)

**Table 2 – Summary of inspection Tasks**

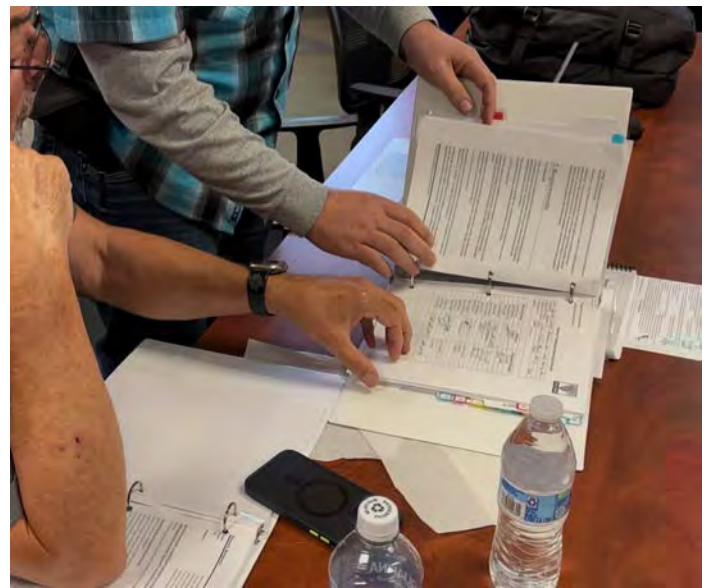
<b>Task</b>	<b>Description</b>	<b>Areas Assessed</b>	<b>WDR Citations</b>
<b>A</b>	<b>Pre-Inspection Conf.</b> (System Managers) 615 W Avenue H Lancaster, CA 93534	<ul style="list-style-type: none"> <li>• Pre-Inspection Questionnaire (version 4)</li> <li>• Asset/system information</li> <li>• Alarm notifications (lift/pump station) and bypass pumping capabilities and training</li> <li>• Field staff training program and competency, spill emergency response training/implementation, pipeline cleaning/inspection maintenance programs, lift/pump station maintenance, emergency response, and improvements, capital improvement program/collaboration between engineering and collections staff/sewer rates/increases, FOG control program and staffing, critical spare part inventory, standard operating procedures (SOPs), mutual assistance, new enhancements for improving compliance with Reissued WDR</li> </ul>	<ul style="list-style-type: none"> <li>• Spec. 5.19</li> <li>• Att. D-4</li> <li>• Att. D-6</li> <li>• Att. D-8</li> <li>• Att. E1</li> <li>• Att. D-11</li> <li>• Att. D-5</li> <li>• Att. D-2</li> <li>• Att. D-8</li> <li>• Att. D-9</li> </ul>
<b>B</b>	<b>Field Staff Interview #1</b> 615 W Avenue H Lancaster, CA 93534	<ul style="list-style-type: none"> <li>• Operator interview (1): City O/M activities, training, equipment, standard operating procedures (SOPs)</li> </ul>	<ul style="list-style-type: none"> <li>• Spec. 5.19</li> <li>• Att. D-4</li> </ul>
<b>C</b>	<b>Field Staff Interview #2</b> 12 <sup>th</sup> Street East at E Lingard Street Lancaster, CA 93534	<ul style="list-style-type: none"> <li>• Operator interviews (2): City O/M activities, training, equipment, standard operating procedures (SOPs)</li> </ul>	<ul style="list-style-type: none"> <li>• Spec. 5.19</li> <li>• Att. D-4</li> </ul>

## 5. TASK A (Pre-Inspection Conference – System Managers)

This task included detailed interviews with the City's Collection System management (Mr. Bruce Katz and Mr. Ben Stewart) who were very knowledgeable and instrumental in providing clear answers to all questions asked during the inspection (see Photos A1-A4 below). Key areas reviewed included field staff training, lift/pump station O/M and emergency response, field spill documentation, system cleaning/inspection programs and maintenance efforts, capital improvements/sewer rates, FOG control program, and critical spare parts inventory.



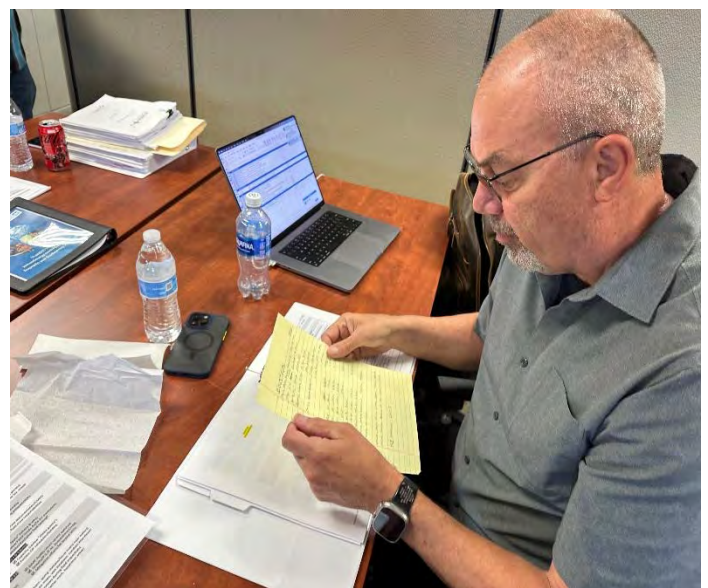
**Task A (Photo A1):** Pre-Inspection Conference with City management.



**Task A (Photo A2):** Pre-Inspection Conference (review of City training records and safety program – VIEW 1).



**Task A (Photo A3):** Pre-Inspection Conference (review of City training records and safety program – VIEW 2).



**Task A (Photo A4):** Pre-Inspection Conference (review of City field data collection records completed by staff).

A list of Best Practices (BPs) identified during Task A of the inspection is presented in Table 3 below.

**Table 3 – TASK A (Best practices identified)**

<b>TASK B</b>	<b>Best Practices (BPs)</b>	<b>WDR Citations</b>
<b>Pre-Inspection Conf.</b> (System Managers)	<ul style="list-style-type: none"> <li>BP A1: Tenured senior management with &gt;40 years of combined collection system operations, maintenance and management experience</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.19</li> <li>Att. D-4</li> </ul>
	<ul style="list-style-type: none"> <li>BP A2: High quality maintenance equipment, safety training program including coordination with local fire department, and implementation of many best practice technologies</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.2,</li> <li>Att. D-6, Prov. 6.1.6</li> </ul>
	<ul style="list-style-type: none"> <li>BP A3: Extensive routine cleaning/inspection programs in place with demonstrated successful outcomes</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.19, Att. D-4</li> </ul>
	<ul style="list-style-type: none"> <li>BP A4: Extensive improvements to work order system including auditing and Q/A of completed past work orders</li> </ul>	<ul style="list-style-type: none"> <li>Att. D-4</li> </ul>
	<ul style="list-style-type: none"> <li>BP A5: Implementation of Key Performance Indicators (KPIs) to measure inspection/cleaning program effectiveness</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.2, Att. D-4</li> </ul>
	<ul style="list-style-type: none"> <li>BP A6: Continuity of Operations tracking</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.2, Att. D-6</li> </ul>

The following Areas of Concern (AOC) were identified for Task A during the inspection (see Table 5 below).

**Table 4 – TASK A (Areas of Concern identified)**

<b>Task A</b>	<b>Areas of Concern (AOC)</b>	<b>WDR Citations</b>
<b>Pre-Inspection Conf.</b> (System Managers)	<ul style="list-style-type: none"> <li>AOC A1: Field staff SOPs, training/drills</li> </ul>	<ul style="list-style-type: none"> <li>Att. E1</li> <li>Spec. 5.2, 5.6, 5.19</li> <li>Att. D-4</li> </ul>
	<ul style="list-style-type: none"> <li>AOC A2: Lift/pump station + force main bypassing procedures incorporated into spill emergency response plan</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.19, Att. D-4</li> <li>Att. D-6</li> </ul>
	<ul style="list-style-type: none"> <li>AOC A3: Force main corrosion/rehabilitation</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.19, Att. D-8</li> </ul>
	<ul style="list-style-type: none"> <li>AOC A4: Capital improvements, Masterplan update, sewer rates/funding update</li> </ul>	<ul style="list-style-type: none"> <li>Att. 8.1-8.3</li> </ul>
	<ul style="list-style-type: none"> <li>AOC A5: Maintenance of critical spare part/inventory including backup/repair parts for force main</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.19, Att. D-4</li> </ul>
	<ul style="list-style-type: none"> <li>AOC A6: FOG program resources covering both commercial and residential efforts</li> </ul>	<ul style="list-style-type: none"> <li>Att. D-7</li> </ul>
	<ul style="list-style-type: none"> <li>AOC A7: Justification for identification system areas for condition assessments</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.2, 5.6</li> <li>Att. D-4, D-8.1-8.3</li> </ul>
	<ul style="list-style-type: none"> <li>AOC A8: Field data collection</li> </ul>	<ul style="list-style-type: none"> <li>Att. E1</li> </ul>
		<ul style="list-style-type: none"> <li>AOC A9: Implementation of all past SSMP Audit findings</li> </ul>

## 6. TASK B (Staff Interview #1 – Lead Operator)

This task included an interview with the City’s current collection system lead operator to further assess the City’s SSMP compliance, implementation, and effectiveness against several key Reissued WDR requirements (see Photo B1 below).



**Task B (Photo B1):** Interview with City lead collection system operator, Mr. Sean Floto.

A list of Best Practices (BPs) identified during Task A of the inspection is presented in Table 5 below.

**Table 5 – TASK A (Best practices identified)**

TASK B	Best Practices (BPs)	WDR Citations
Staff Interview #1 (Lead Operator)	<ul style="list-style-type: none"> <li>BP A1: Tenured and trained lead operations staff</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.19</li> <li>Att. D</li> </ul>

The following Areas of Concern (AOC) were identified for Task B during the inspection (see Table 5 below).

**Table 6 – Task B (Areas of Concern identified)**

TASK B	Areas of Concern (AOC)	WDR Citations
Staff Interview #1 (Lead Operator)	<ul style="list-style-type: none"> <li>AOC B1: Spill emergency response plan (SERP) implementation and SSMP familiarity</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.12</li> <li>Att. D-6</li> </ul>
	<ul style="list-style-type: none"> <li>AOC B2: Additional resources for expanding existing cleaning and field inspection activities</li> </ul>	<ul style="list-style-type: none"> <li>Spec. 5.12, 5.19</li> <li>Att. D-4</li> </ul>

## 7. TASK C (Staff Interview #2 – Field Operators)

This task included an interview with two of the City’s collection system field operators to further assess the City’s SSMP compliance, implementation, and effectiveness against several key Reissued WDR requirements (see Photo C1-C4 below).



**Task C (Photo C1):** Field operator interviews (add names and titles here including Cert levels).



**Task C (Photo C2):** Inspection of field operator vehicle and equipment (view 1).



**Task C (Photo C3):** Inspection of field operator vehicle and equipment (view 2).



**Task C (Photo C4):** Inspection field operations maps.



A list of Best Practices (BPs) identified during Task C of the inspection is presented in Table 7 below.

**Table 7 – TASK C (Best practices identified)**

TASK B	Best Practices (BPs)	WDR Citations
<b>Staff Interview #2</b> (Field Operators)	<ul style="list-style-type: none"> <li>• BP C1: Competent field staff with strong understanding of duties and responsibilities; comprehensive O/M and emergency field equipment</li> </ul>	<ul style="list-style-type: none"> <li>• Spec. 5.19</li> <li>• Att. D</li> </ul>

A list of Areas of Concern (AOC) identified for Task C during the inspection are presented in Table 8 below.

**Table 8 – Task C (Areas of Concern identified)**

TASK C	Areas of Concern (AOC)	WDR Citations
<b>Staff Interview #2</b> (Field Operators)	<ul style="list-style-type: none"> <li>• AOC C1: None</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

## 8. Findings and Recommendations

To meet/exceed the requirements of the Reissued WDR, the Agency should address all findings including potential violations and areas of concerns identified in Table 9 below prior to completion of its next required SSMP Audit.

**Table 9 – Findings and Recommendations**

Areas of Concern (AOC)	Recommendations
<ul style="list-style-type: none"> <li>AOC A1: Field staff SOPs, training/drills</li> </ul>	<ul style="list-style-type: none"> <li>Improve operator training program covering SERP/lift/pump stations; ensure adherence to established procedures; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A2: Lift/pump station + force main bypassing procedures incorporated into spill emergency response plan</li> </ul>	<ul style="list-style-type: none"> <li>Improve procedures, training, and incorporate procedures into current SERP; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A3: Force main corrosion/rehabilitation</li> </ul>	<ul style="list-style-type: none"> <li>Provide narrative for completion of SSMP Audit; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A4: Capital improvements and sewer rates/funding</li> </ul>	<ul style="list-style-type: none"> <li>Provide narrative for completion of SSMP Audit detailing programs, rates and funding schedule (short/long-term); update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A5: Maintenance of critical spare part/inventory including backup/repair parts for force main</li> </ul>	<ul style="list-style-type: none"> <li>Improve existing critical parts lists/inventory for completion of SSMP Audit; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A6: FOG program resources covering both commercial and residential efforts;</li> </ul>	<ul style="list-style-type: none"> <li>Improve program implementation for completion of SSMP Audit; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A7: Justification for identification system areas for condition assessments</li> </ul>	<ul style="list-style-type: none"> <li>Provide narrative for justification for intervals/schedule for completion of SSMP Audit; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A8: Field data collection</li> </ul>	<ul style="list-style-type: none"> <li>Improve existing operator field data collection efforts to fully comply with SERP/documentation requirements; ensure adherence to established procedures; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC A9: Implementation of all past SSMP Audit findings</li> </ul>	<ul style="list-style-type: none"> <li>Address all past SSMP Audit findings (completed, carry-overs) for completion of SSMP Audit and for next (2025) required SSMP Update; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC B1: Spill emergency response plan (SERP) implementation and SSMP familiarity</li> </ul>	<ul style="list-style-type: none"> <li>Improve overall operator familiarity and exposure to both SERP and related SSMP elements; update SSMP and change log when implemented.</li> </ul>
<ul style="list-style-type: none"> <li>AOC B2: Additional resources for expanding existing cleaning and field inspection activities</li> </ul>	<ul style="list-style-type: none"> <li>Evaluate need for additional resources for completion of SSMP Audit; update SSMP and change log when implemented.</li> </ul>

## 9. Post-Inspection Requests

The following additional items required for completing the SSMP Audit were identified during the inspection.

1. Lift/Pump station alarm testing records (one year).
2. Lift/Pump station field staff completed training records covering bypassing operations (one year).
3. Force main conveyance system corrosion report and details for rehabilitation
4. Portable pump/backup generator testing records (one year).
5. List of new equipment acquired since last SSMP Audit.
6. Narrative describing new manhole inspection program.
7. Narrative describing past 3 years (planned/completed) for all identified sewer capital improvement projects and schedule (next 3-5 years).
8. List of outstanding open work orders.
9. Updated organizational chart (including any vacant position(s) and time positions open.
10. Sewer rate study (plan/schedule)
11. Sewer Master Plan update (plan/schedule)
12. Spill records (completed City files including all documentation for the following spills):
  - a. CIWQS spill ID#894530
  - b. CIWQS spill ID#876795
  - c. CIWQS spill ID#852885

On August 1, 2024, the City provided documentation to address all of the above requests. Comments, suggestions, and recommendations based on review of the above information provided by the City is incorporated into the SSMP Audit report.

## 10. Conclusions

The City should develop a specific plan and schedule for addressing all identified area of concern shown in Tables 9 and 10 above. Upon resolution of the potential violations/areas of concern, the City should update its SSMP change log and narratives describing its proactive measures taken for addressing all identified outstanding deficiencies. The City should incorporate the inspection findings and develop an implementation plan/schedule to address all findings to support completion of the City's next required SSMP Audit required per Attachment D-10 and Specifications 5.4 of the Reissued WDR, due to be uploaded to CIWQS by the City on or before 11/2/2024.

END OF REPORT

## **Appendix 2 — District Spill Performance Benchmark Report**

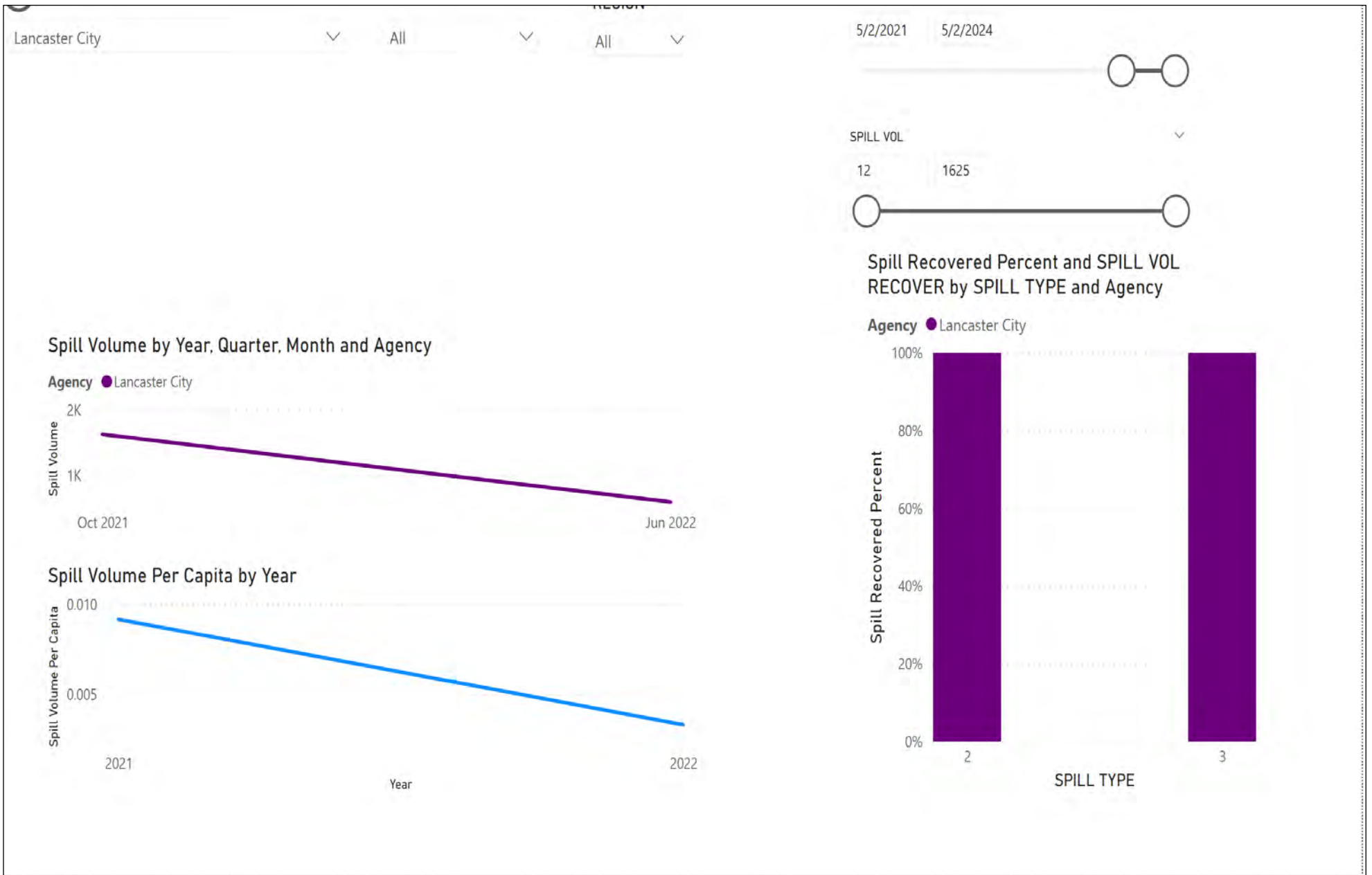
*The purpose of this Appendix is to provide a spill performance report for assisting the City evaluate its existing spill benchmarking/performance, including comparisons with other collection system agencies within the Lahontan Regional Board area.*

Figure 1 – City Spill Dashboard during SSMP Audit Period (May 2021-May 2024) .....	3
Figure 2 - City Spill Dashboard (volume of spills by year and recovery metrics during SSMP Audit Period (May 2021-May 2024) .....	4
Figure 3 - City causes of spills during SSMP Audit Period (May 2021-May 2024).....	5
Figure 4 - City trends of spills by number (2007-2024).....	6
Figure 5 - City trends of spills by volume (2007-2024) .....	7
Figure 6 - City trends of spills by cause (2007-2024) .....	8
Figure 7 – City locations of where failures occurred (2007-2024) .....	9
Figure 8 - City Spill rates (# of spills/100 miles of sewer) compared to other agencies during Audit Period (2007-2024) .....	10
Figure 9 – City spill volumes discharged compared with other agencies during (2007-2024) .....	11
Figure 10 – City spill recoveries (%) compared with other agencies (2021-2024) .....	12
Figure 11 – City Spill Causes compared with other agencies (2007-2024) .....	13



**Figure 1 – City Spill Dashboard during SSMP Audit Period (May 2021-May 2024)**

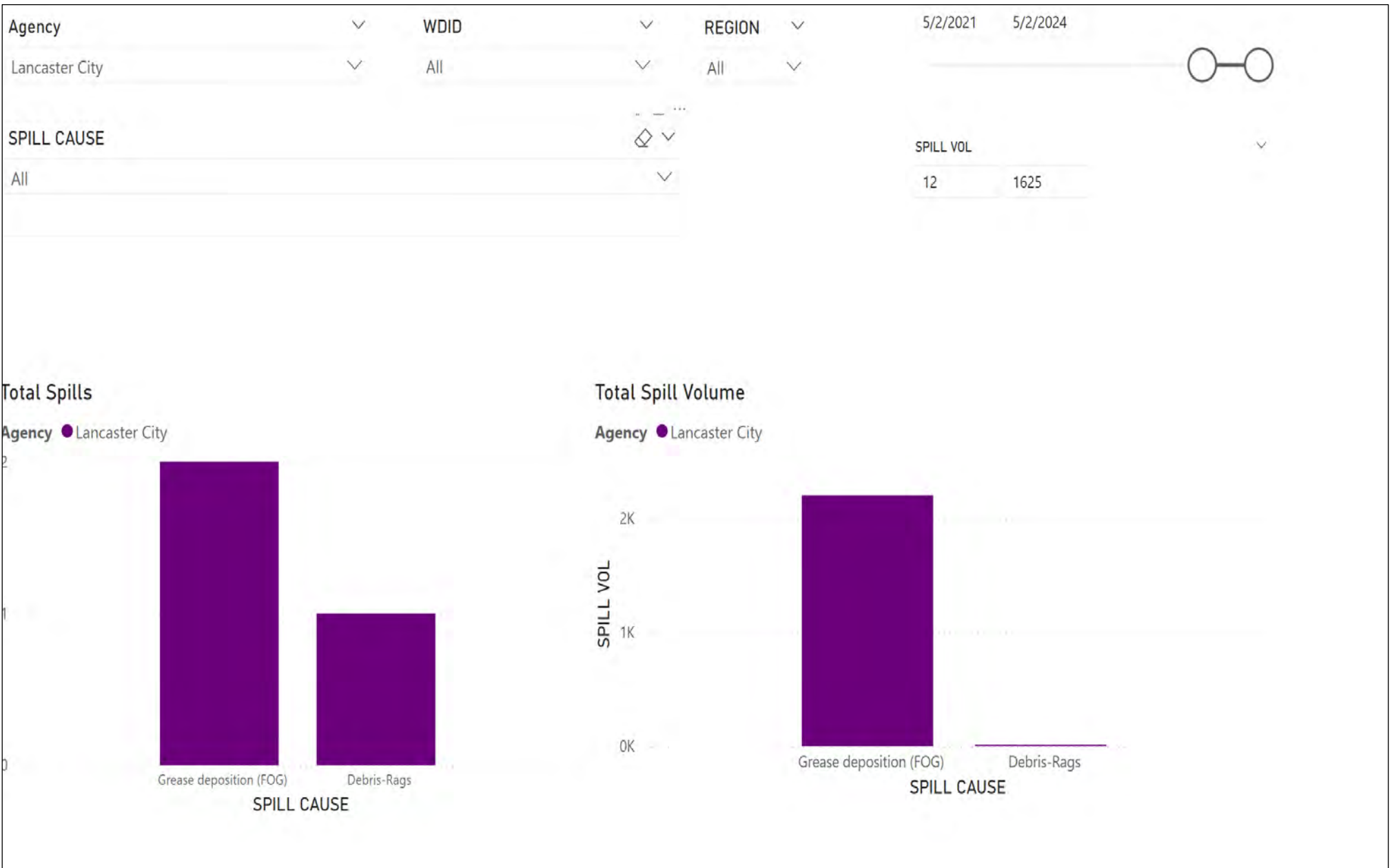
**Observation:** The City rolling average spill rate per year during the SSMP Audit period decreased significantly during Audit period.



**Figure 3 - City Spill Dashboard (volume of spills by year and recovery metrics during SSMP Audit Period (May 2021-May 2024))**

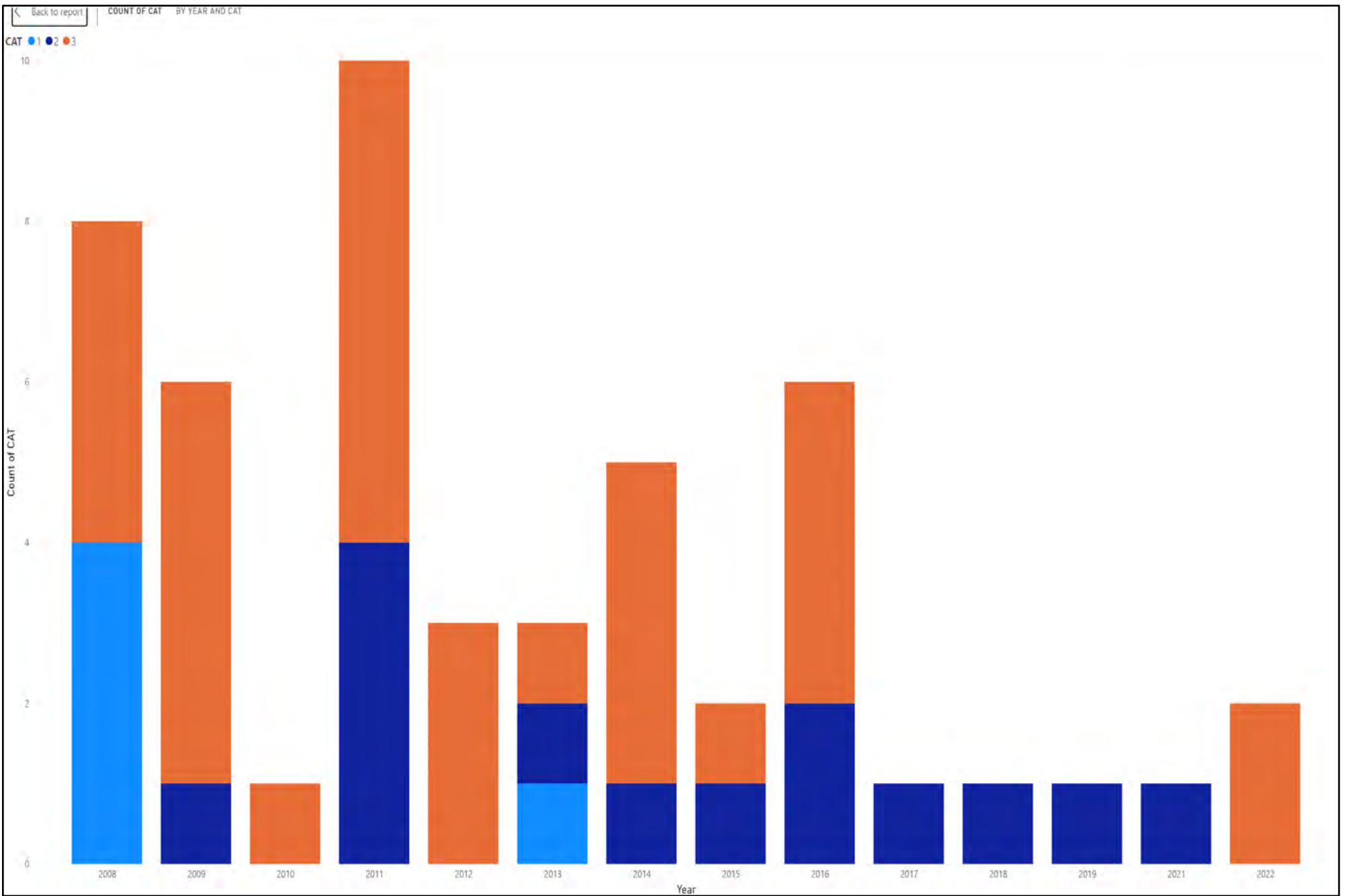
**Observations:** The City volume of spills per capita (population) decreased during the SSMP Audit period; the District’s spill recovery metrics were 100% (Category 2 and Category 3 spills) during Audit period.





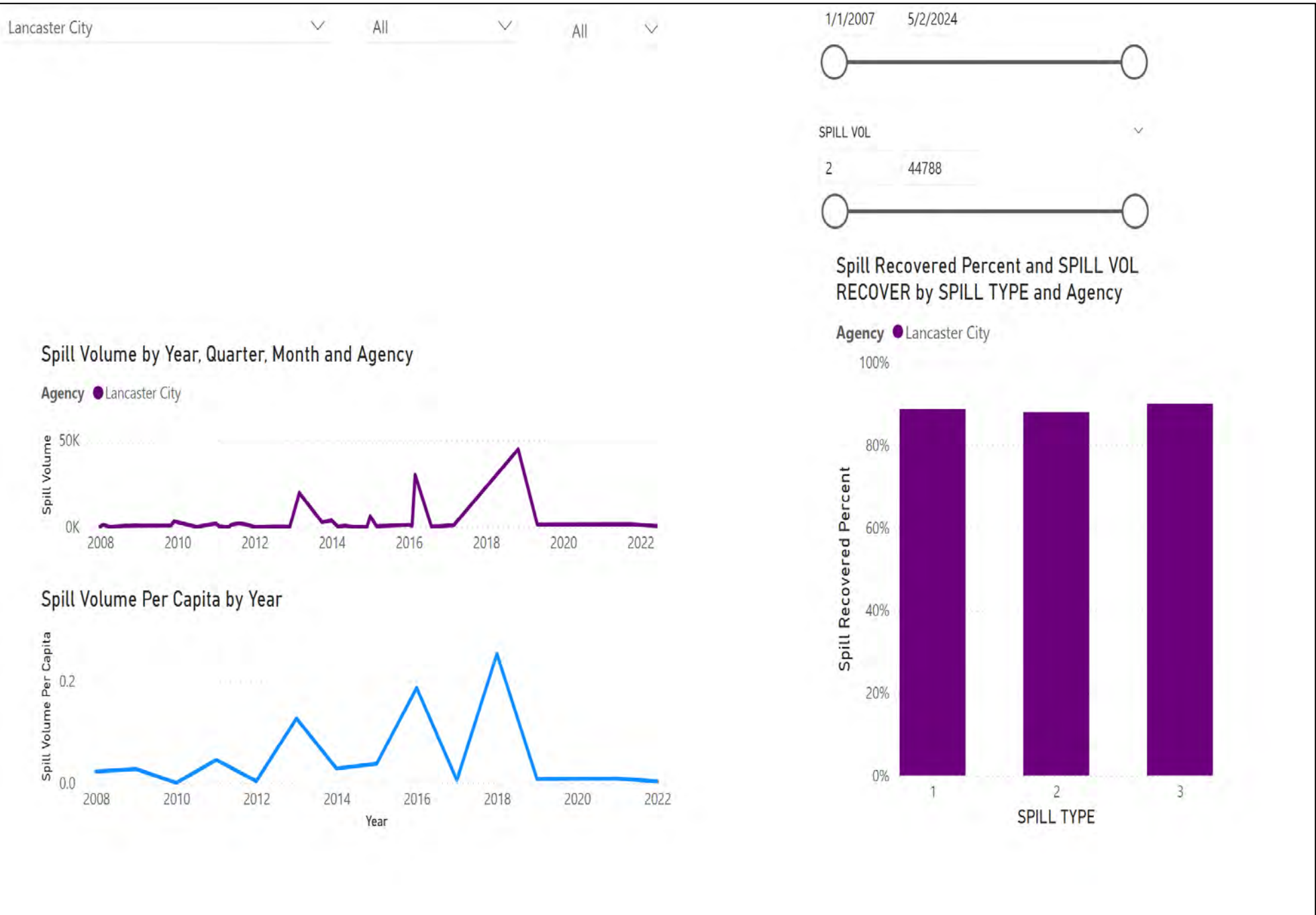
**Figure 3 - City causes of spills during SSMP Audit Period (May 2021-May 2024)**

Observations: The City main spill causes were grease (Fats, Oils and Grease, FOG) during Audit period.



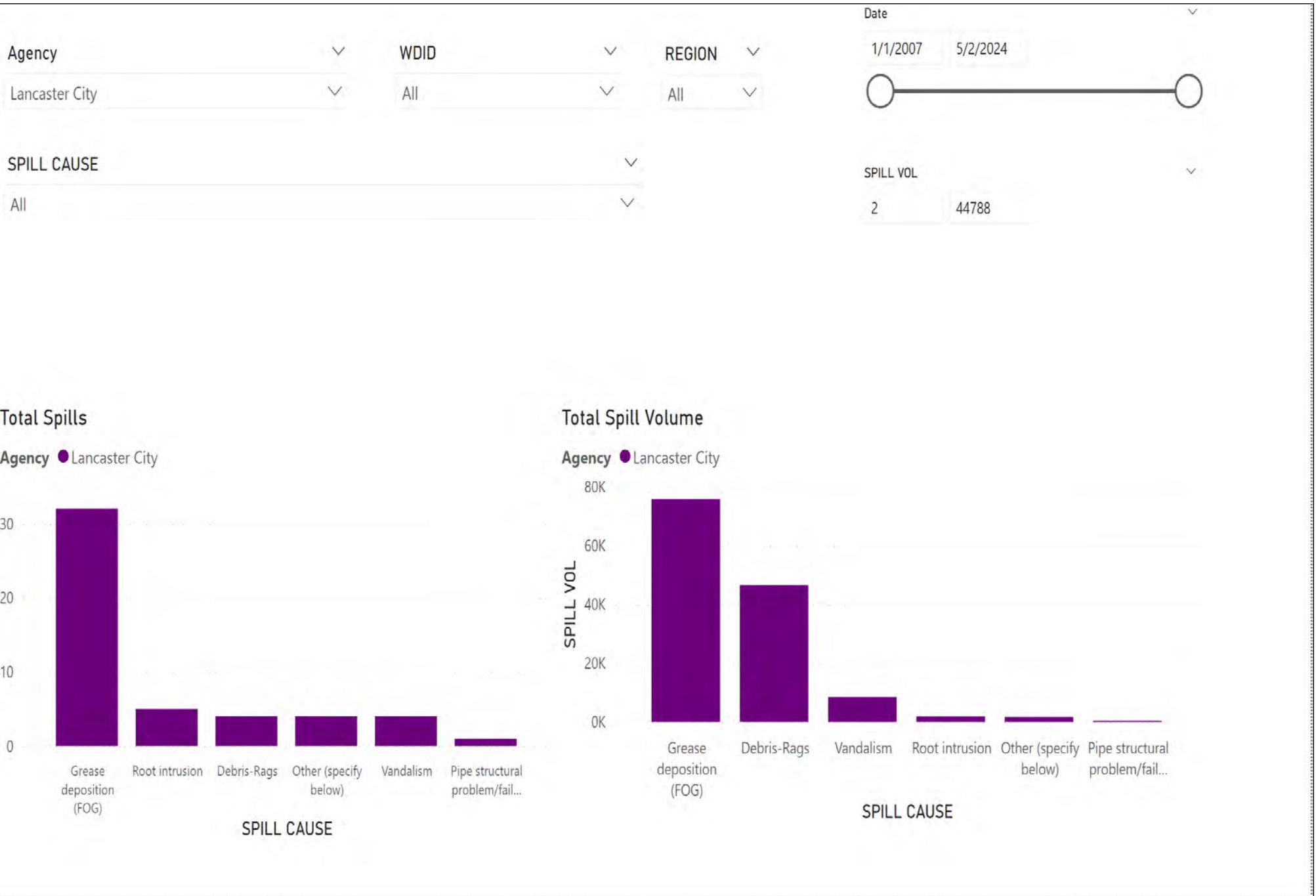
**Figure 4 - City trends of spills by number (2007-2024)**

Observations: City total number of spills reported since 2007 has significantly decreased.



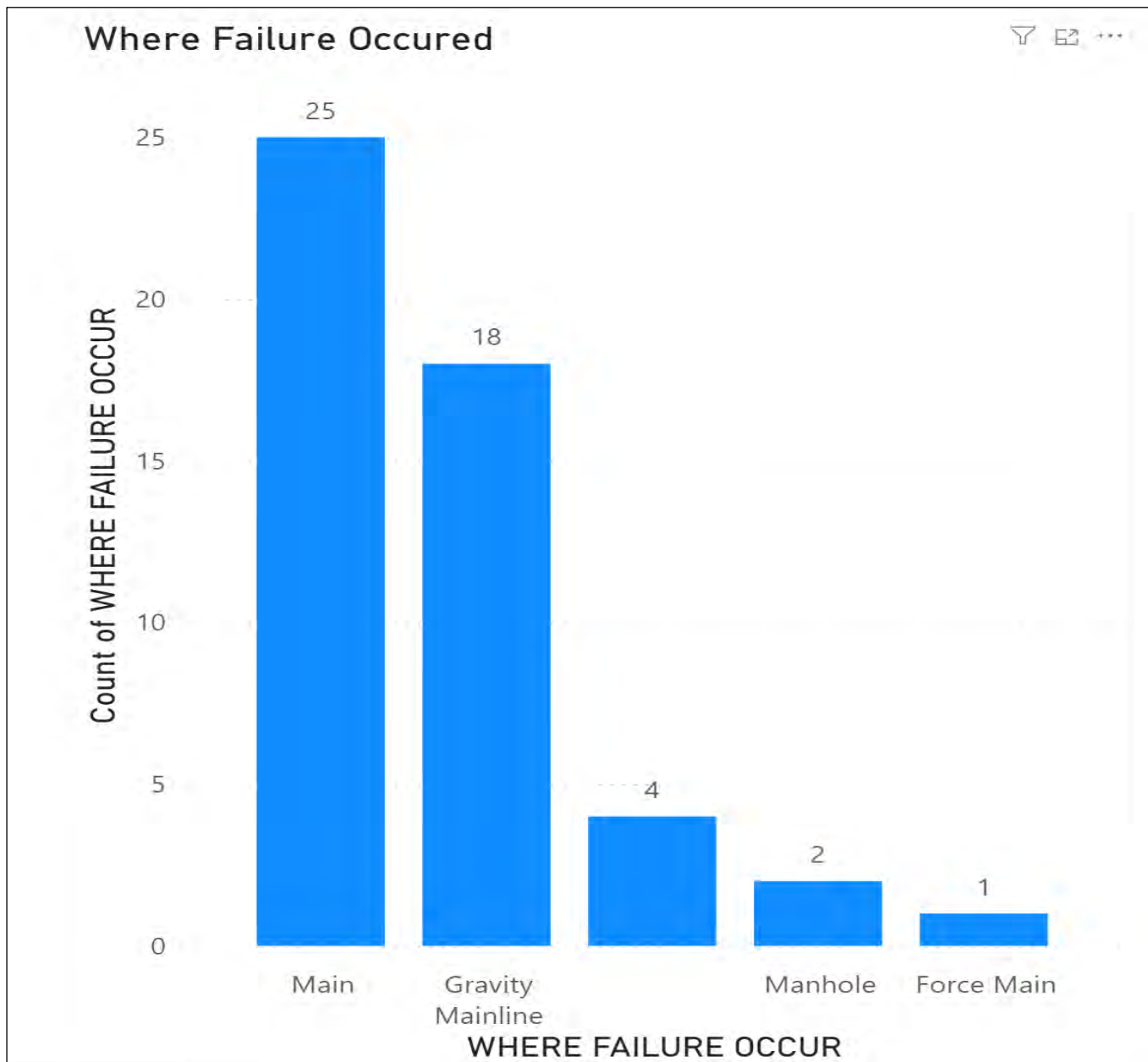
**Figure 5 - City trends of spills by volume (2007-2024)**

Observations: City spill volumes discharged have significantly decreased; volumes recoveries average 89% (Cat 1), 88% (Cat 2), and 90% (Cat 3)



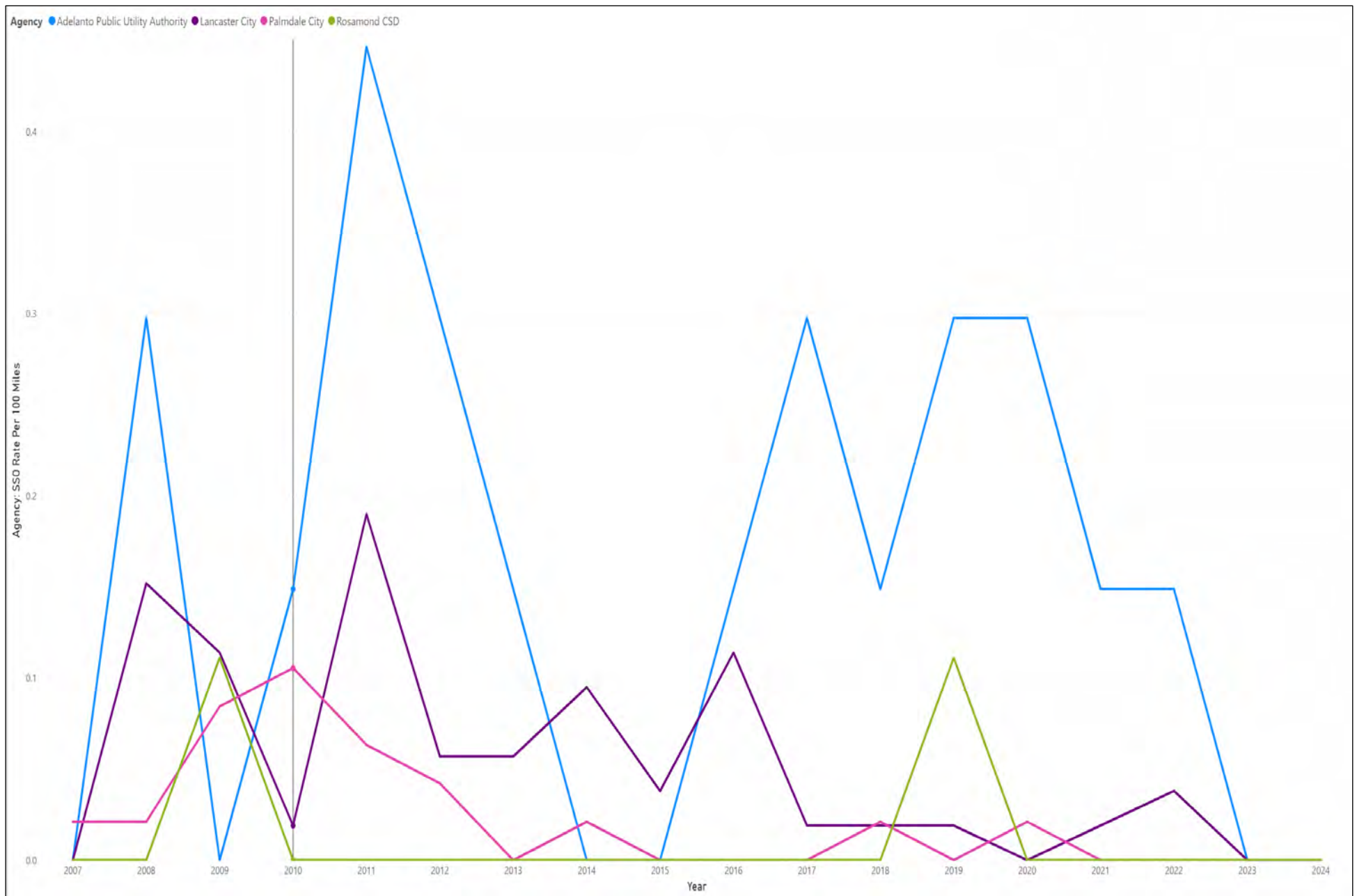
**Figure 6 - City trends of spills by cause (2007-2024)**

Observations: The City main spill causes were grease (Fats, Oils and Grease, FOG).



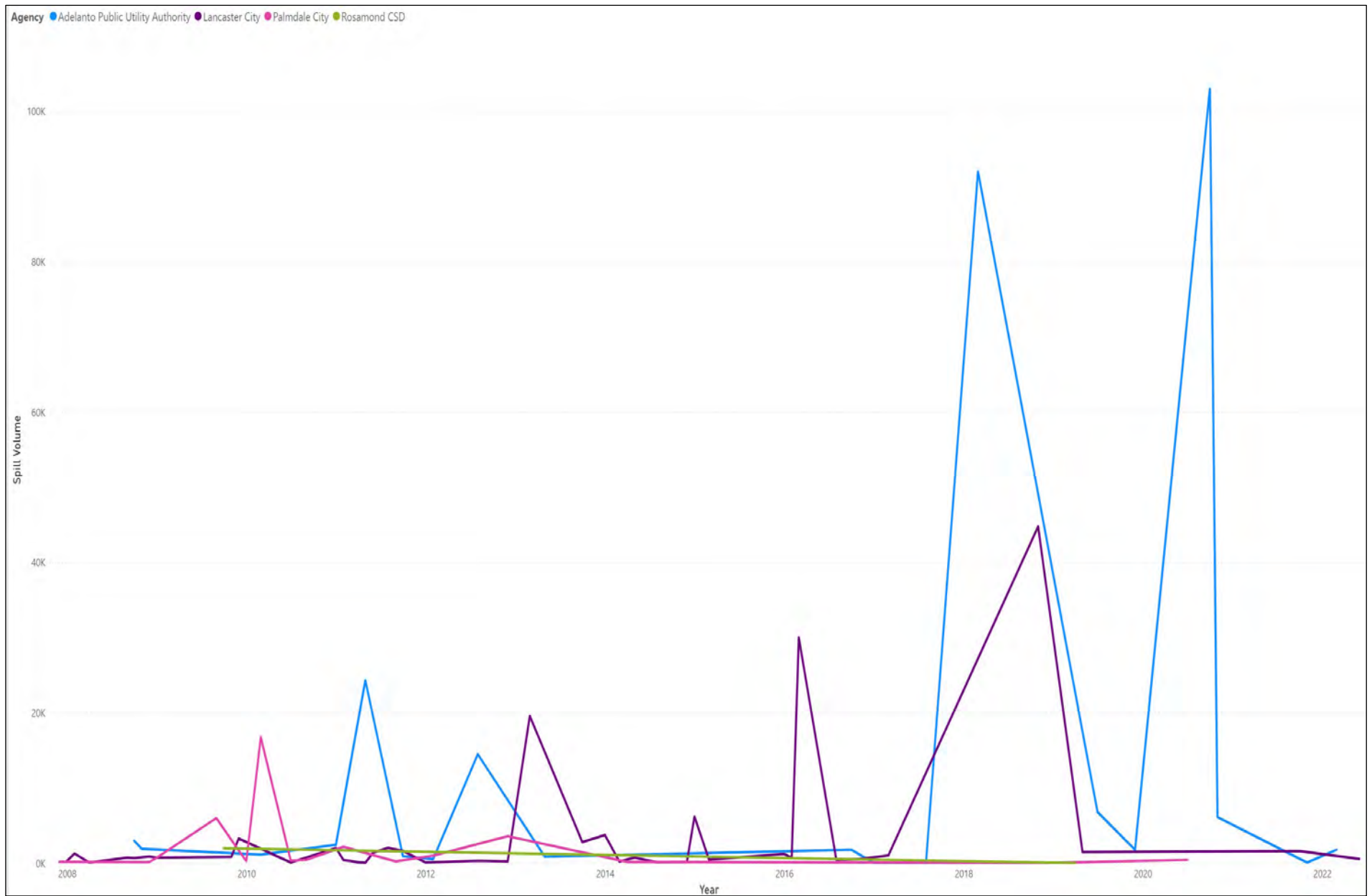
*Figure 7 – City locations of where failures occurred (2007-2024)*

Observations: The City main spill locations were mainline sewers.



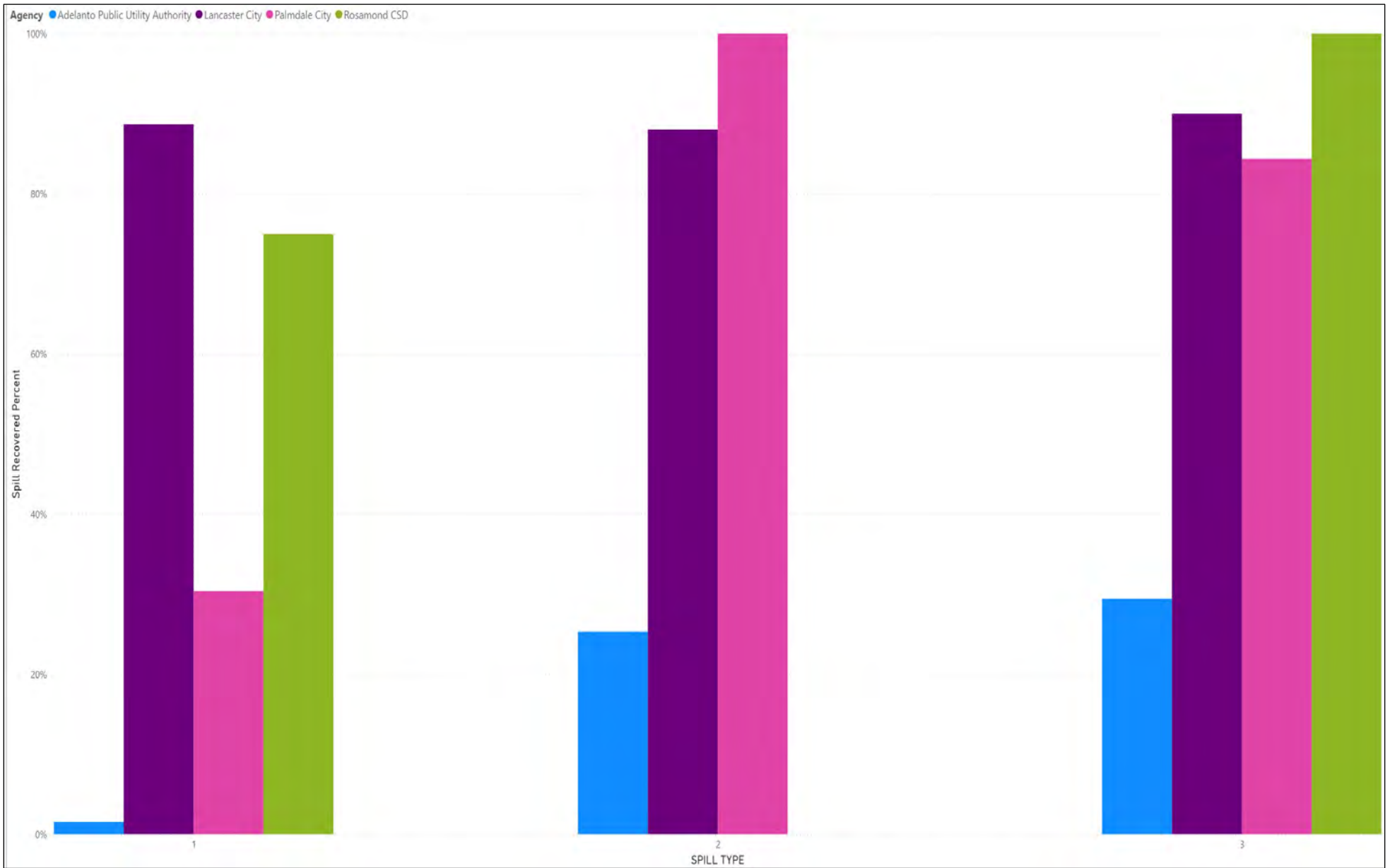
**Figure 8 - City Spill rates (# of spills/100 miles of sewer) compared to other agencies during Audit Period (2007-2024)**

Observations: The District's net spill volume for spills were lower than other agencies during Audit period.



**Figure 9 – City spill volumes discharged compared with other agencies during (2007-2024)**

Observation: The District’s spill main causes (by number of spills) was root intrusion during Audit period.



**Figure 10 – City spill recoveries (%) compared with other agencies (2021-2024)**

Observation: The City spill recovery percentages were higher than most other agencies.





**Figure 11 – City Spill Causes compared with other agencies (2007-2024)**

**Observation:** The City’s main spill causes by number of spills (32 spills) was higher for grease (Fats, Oils and Grease) than other agencies by number of spills; the City reported totals for grease discharges of ~75,000 gallons.

## **Appendix 3 — City SSMP Audit Implementation Plan and Schedule**

*The purpose of this Appendix is to provide a plan/schedule to address SSMP Audit findings, recommendations, and corrective actions for utilization with updating the City's next required SSMP update (due on or before May 2, 2025).*

## FINDINGS (WDR ATTACHMENTS)

Requirements		Start Date	End Date	Findings/Recommendations
Att. D-1	Goal & Intro	Sept 2024	Oct 2024	✓ Improve SSMP Change Log
Att. D-2	Organization	Sept 2024	Oct 2024	✓ Improve LRO and Data Submitter training
Att. D-3	Legal Authority	N/A	N/A	✓ None
Att. D-4	O/M Program	Sept 2024	Dec 2024	<ul style="list-style-type: none"> <li>✓ Improve Capital Improvement Plan details</li> <li>✓ Improve critical parts/inventory</li> <li>✓ Assess need for additional cleaning resources</li> <li>✓ Improve spill records and inspection field data collection/forms</li> <li>✓ Improve staff training</li> <li>✓ Improve documentations for testing backup generator at pump station</li> <li>✓ Improve Hot Spot description</li> <li>✓ Improve manhole inspection form</li> </ul>
Att. D-5	Design and Performance	N/A	N/A	✓ None
Att. D-6	SERP	Sept 2024	Dec 2024	<ul style="list-style-type: none"> <li>✓ Improvements to implementation including staff training/demonstration of competency</li> <li>✓ Improvements to spill records</li> </ul>
Att. D-7	Pipe Blockage Control Program	Sept 2024	Dec 2024	✓ Improvements for assessing FOG program effectiveness
Att. D-8	SECAP	Sept 2024	Dec 2024	✓ Improvements to budgets, spending, scheduling, and project completion with capital improvement program
Att. D-9	Monitoring, Measurement	N/A	N/A	✓ None
Att. D-10	Audits	Next Audit	Next Audit	✓ Solicit input from field staff for future Audits
Att. D-11	Communications	N/A	N/A	✓ None

## FINDINGS (WDR SPECIFICATIONS)

Requirements		Start Date	End Date	Findings/Recommendations
Spec. 5.1	Designation of LRO	Sept 2024	Oct 2024	✓ Improve LRO and Data Submitter training
Spec. 5.2	SSMP Development, Implementation	N/A	N/A	✓ None
Spec. 5.3	SSMP Updates	N/A	N/A	✓ None
Spec. 5.4	SSMP Audits	Sept 2024	Dec 2024	✓ Solicit input from field staff for future Audits
Spec. 5.6	System Resilience	Sept 2024	Dec 2024	✓ Consider recommendations outlined in each element of SSMP Guidance Manual
Spec. 5.10	Resources	Sept 2024	Dec 2024	✓ Improve evaluating allocation of collection system resources for cleaning
Spec. 5.11	Performance Analysis	N/A	N/A	✓ None
Spec. 5.12	SERP	Sept 2024	Dec 2024	✓ Additional improvements with staff SERP training and demonstration of competency
Spec. 5.13	Notif, Monitoring, Reporting, Records	Sept 2024	Dec 2024	✓ Additional improvements to ensuring large spill monitoring program – previous Audit finding
Spec. 5.14	Notifications (private spills)	N/A	N/A	✓ None
Spec. 5.15	Failure to report	N/A	N/A	✓ None

## **Appendix 4 — List of City Historic Spills (2007-2024)**

## Spill Public Report – Spill Event ID(s) Page

Here is the detail page of your Sanitary Sewer System Spill Report search for selected Regional Board, county, responsible agency, or sanitary sewer system. These results correspond to the following search criteria:

**SEARCH CRITERIA:** [\[REFINE SEARCH\]](#)

- Agency (Lancaster City)
- Spill Type (Category 1; Category 2; Category 3)
- Agency (Lancaster City)
- Agency (Lancaster City)
- Agency (Lancaster City)
- Agency (Lancaster City)
- Agency (Lancaster City)

The table below presents important details from Enrollee-submitted certified spill events, as submitted through individual spill reports, which meet the search criteria selected on the Sanitary Sewer System (SSS) Spill Report Form. If data is not shown for a particular field, it means the Enrollee did not provide the information and was not required to do so. To view the entire spill report, select the corresponding "Spill Event ID".

**DRILLDOWN HISTORY:**

REGION: 6

Event ID	Region	Responsible Agency	Sewer System	WDID	Spill Category	Spill Start Date	Spill Vol (gal)	Spill Vol Recovered (gal)	Spill Vol Reached Surface Water (gal)	System Failure Location	Spill Appearance Point
<a href="#">894530</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Monthly Category 3 Spill	2024-04-15 13:54	461	461		Gravity Mainline	Manhole,Upper Lateral (Private)
<a href="#">883416</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2022-06-19 10:00	577	577	0	Gravity Mainline	Manhole
<a href="#">881947</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2022-06-19 02:40	12	12	0	Gravity Mainline	Gravity Mainline
<a href="#">876795</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2021-10-06 11:20	1,625	1,625	0	Gravity Mainline	Manhole
<a href="#">858437</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2019-05-22 08:30	1,500	1,400	0	Gravity Mainline	Manhole
<a href="#">852885</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2018-11-08 13:00	44,788	37,366	0	Gravity Mainline	Gravity Mainline
<a href="#">833534</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2017-03-06 08:30	1,050	1,050	0	Gravity Mainline	Manhole
<a href="#">830261</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2016-11-29 02:00	548	548	0	Gravity Mainline	Manhole
<a href="#">827475</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2016-08-18 00:00	452	452	0	Force Main	Force Main
<a href="#">823322</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2016-03-20 08:30	30,000	30,000	0	Manhole	Manhole
<a href="#">822951</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2016-03-13 13:40	10	10	0	Gravity Mainline	Manhole
<a href="#">821862</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2016-02-06 09:45	750	390	0	Gravity Mainline	Lateral Clean Out (Private)
<a href="#">820929</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2016-01-12 07:00	1,250	1,250	0	Gravity Mainline	Manhole
<a href="#">815008</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2015-03-27 00:00	500	0	0	Gravity Mainline	Manhole
<a href="#">812321</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2015-01-09 14:00	6,210	1,750	0	Manhole	Manhole

<a href="#">812047</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2014-12-30 11:30	180	180	0	Gravity Mainline	Manhole
<a href="#">808726</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2014-08-20 10:30	134	0	0	Gravity Mainline	Manhole
<a href="#">806544</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2014-05-11 16:45	770	770	0	Gravity Mainline	Manhole
<a href="#">804497</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2014-03-10 13:20	226	226	0	Gravity Mainline	Manhole
<a href="#">803193</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2014-01-19 08:00	3,764	3,764	0	Gravity Mainline	Manhole
<a href="#">800408</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2013-10-29 10:30	2,000	2,000	0	Gravity Mainline	Manhole
<a href="#">799959</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2013-10-13 18:20	827	827	0	Gravity Mainline	Gravity Mainline;Manhole
<a href="#">792633</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 1	2013-03-01 21:00	19,590	18,610	980	Main	Manhole
<a href="#">788972</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2012-12-04 13:19	250	250	0	Main	Manhole
<a href="#">785599</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2012-08-23 10:30	327	327	0	Main	Manhole
<a href="#">776679</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2012-01-27 20:00	100	100	0	Main	Manhole
<a href="#">771948</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2011-10-07 04:00	1,655	1,655	0	Main	Manhole
<a href="#">769621</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2011-08-05 17:30	1,110	1,110	0	Main	Manhole
<a href="#">769617</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2011-08-08 08:00	948	948	0	Main	Manhole
<a href="#">767540</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2011-06-15 10:00	1,400	1,400	0	Main	Manhole
<a href="#">766841</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2011-05-23 08:10	75	75	0	Main	Gravity sewer;Manhole
<a href="#">765816</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2011-04-11 22:35	122	0	0	Main	Manhole
<a href="#">764158</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2011-03-06 17:30	315	315	0	Main	Manhole
<a href="#">763993</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2011-02-28 18:05	430	430	0	Main	Manhole
<a href="#">760399</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2011-01-05 13:00	1,100	1,100	0	Main	Manhole
<a href="#">760371</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2011-01-05 08:34	929	929	0	Main	Manhole
<a href="#">754698</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2010-07-02 09:00	100	100	0		Gravity sewer
<a href="#">747940</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 2	2009-12-28 13:40	2,500	2,500	0	Main	Manhole
<a href="#">747627</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2009-12-14 16:00	800	800	0		Manhole
<a href="#">747278</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2009-11-25 07:00	325	325	0	Main	Manhole

<a href="#">746680</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2009-11-09 16:30	525	525	0	Main	Manhole
<a href="#">732009</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2009-01-14 12:00	150	150	0	Main	Manhole
<a href="#">732005</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2009-01-13 11:00	600	600	0	Main	Manhole
<a href="#">731738</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2008-12-29 15:15	900	900	0	Main	Manhole
<a href="#">728120</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2008-10-17 12:00	700	650	0	Main	Other sewer system structure
<a href="#">725987</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 1	2008-09-04 19:30	750	675	75	Main	Manhole
<a href="#">716437</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2008-04-18 15:30	2	2	0		Manhole
<a href="#">716225</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 1	2008-04-15 17:45	100	25	75	Main	Manhole
<a href="#">714294</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 3	2008-02-27 18:45	100	0	0		Manhole
<a href="#">713782</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 1	2008-02-20 09:15	1,200	0	1,200	Main	Manhole
<a href="#">712313</a>	6	Lancaster City	City Of Lancaster CS	6SSO11136	Category 1	2008-01-25 13:20	300	150	150	Main	Manhole

The current report was generated with data as of: Wednesday, August 28, 2024











# Sewer System Management Plan (SSMP) Audit (May 2021 to May 2024)

Final Audit Report

2024-10-31

Created:	2024-10-31
By:	Julie Worrell (jworrell@cityoflancasterca.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAUQtJ-4yI16zan6doZziBVHBUy95J4hf2

## "Sewer System Management Plan (SSMP) Audit (May 2021 to May 2024)" History

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