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Sewer System
Management Plan and
Annual Reports:
Reissued Requirements


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Sewer System Management Plan Presentation Outline

- Identify Plan related references from the Reissued Order
- Review changes and areas removed from the SSMP
- Highlight areas for possible additions
- Discuss Immediate and future schedules for compliance
- Review major Element possible additions
- Concluding observations pending future training opportunities
- Questions and Answers (thru Zoom Q&A)



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Sewer System Management Plan Reissued Waste Discharge Requirement References

- 5.2 Sewer System Management Plan Development and Implementation
- 5.3 Certification of Sewer System Management Plan and Plan Updates
- 5.4 Sewer System Management Plan Audits
- 5.5 Six-Year Sewer System Management Plan Update
- 5.6 System Resilience
- 5.7 Allocation of Resources
- 5.9 Reporting Certification
- 5.10 System Capacity
- 5.11 System Performance Analysis
- 5.13 Notification, Monitoring, Reporting and Recordkeeping Req - Annual Report, Maps
- 5.14 Electronic Sanitary Sewer System Service Area Boundary Map
- 6.3 Sewer System Management Plan Availability
- **Attachment D - Sewer System Management Plan – Required Elements**



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Sewer System Management Plan Elements that Are Generally Unchanged

- Element 2 – Organization
- Element 3 – Legal Authority
 - Only added easement accessibility agreements
- Element 5 – Design and Performance Provisions
- Element 9 – Monitoring and Program Modifications
- Element 10 – Internal Audits
 - Only schedule changes
- Element 11 – Communications Program



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Sewer System Management Plan Items Removed from the Plan

- Audit schedules changed from 2 years to 3 years
- Plan governing board adoptions from 5 years to 6 years
- Overflow Emergency Response Plan now Spill Emergency Response Plan
- Water Quality Monitoring Plan removed
- Root control moved back to Element 4 – O&M Program
- No requirement for critical supporting documents



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Sewer System Management Plan Areas for Probable Additions to a Plan

- Resiliency and climate change
- Asset management
- Publicly owned laterals
- Blockage control plan (Element 7)
- Revised audit/Plan adoption schedules
- Expanded Communications
- References to Service Area Maps
- Surface water incl Waters of US
- Exfiltration to groundwater
- Capital funding/coordination
- Change log attachment
- Spill now overflow
- Coordination with Storm/Utilities
- Requires procedures



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Sewer System Management Plan

Procedures Specifically Identified in the Reissue

- Section 5.2 - Plan Development and Implementation
- Section 5.6 – Resiliency
- Element 3 – Legal Authority
- Element 4 – Mapping, CIWQS training
- Element 5 – Inspection and testing
- Element 7 – Evaluation of sewer pipe blockages
- Element 8 – Component specific evaluation of design criteria
- Element 9 – Updating Plan procedures
- Element 10 – Internal audit



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Sewer System Management Plan

Immediate Actions by June 5, 2023

- Enrollee certification of continuation of coverage
- Upload agency Plan for continuing coverage (Section 5.2)
- Revisions to Overflow Emergency Response Plan
 - Retitled Spill Emergency Response Plan
 - New Category 4 spill
 - New sampling requirements



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Sewer System Management Plan

Long Term Actions Following June 5, 2023

- Plan Elements remain the same – 11 total Elements
- Plan Change Log must be attached (Section 5.5)
- Category 4 details reporting – February 1 starting 2024
- Annual Report – April 2024 – including 10 year performance report graphs
- Audit Report due 6 months following audit period – First April 15, 2024
- Audit report certified/submitted to CIWQS
- 6-yr Plan re-adoption based on population category – see SSO office Look-up
- Electronic Service Area Boundary Map – December 31, 2025



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Sewer System Management Plan

Element 1 – Goals and Introduction (Page D-2 & 3)

- Must include:
 - Regulatory Context
 - Plan Update Schedule
 - Sewer System Overview
 - Reference to the up-to-date system maps



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Sewer System Management Plan - Annual Reports

(Section 3.9, Page E1-17))

- Replaces Enrollee certified Collection System Questionnaire
- Due April 1st following calendar year – initial 2024
- Adds additional system asset information
- Updated service boundary area map if changed
- Must include 10-year system performance analysis (Section 5.11)
- CIWQS generated and certified graphs
- Annual Report Submitted to CIWQS
- Certified by the Legally Responsible Official



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Sewer System Management Plan Element 6 Spill Emergency Response Plan

- Element re-titled Spill Emergency Response Plan
- To be available by June 5, 2023 with procedures
- New Category 4 spill definition/reporting
- Requires revisions for new category and sampling requirements
- Requires pre-planned coordination with storm/utility agencies
- New CIWQS reporting schedules – Cat 4 spills
- Sampling 12 hours potential discharge to surface waters
- No more Water Quality Monitoring Plan – included in Spill Plan
- Annual review and assess effectiveness – No Board adoption



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Sewer System Management Plan

Element 8 - System Evaluation and capacity Assurance and CIP

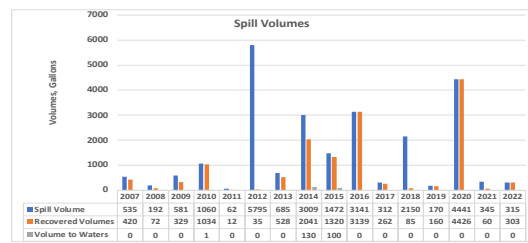
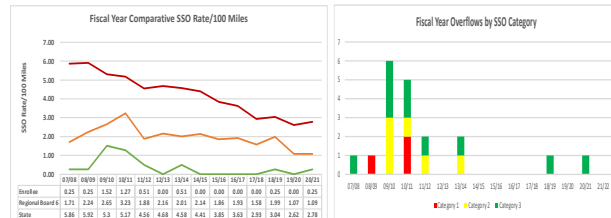
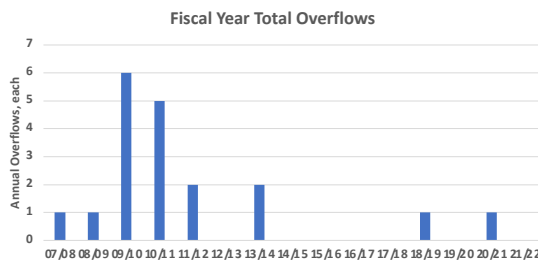
- Condition assessment schedules
- Prioritized condition assessment based upon risk
- Identify assets vulnerable to direct/indirect climate change impacts
- Capacity assessments – peaks, design storm, I/I impacts
- System specific resiliency impacts
- Prioritization of corrective actions from assessments
- Capital improvement plan – schedules, funding,
- Joint coordination - O&M staff coordination and involvement
- Interagency coordination



Sewer System Management Plan

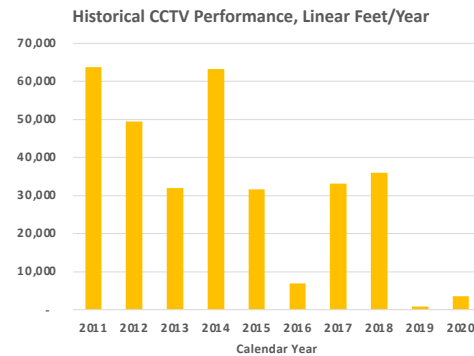
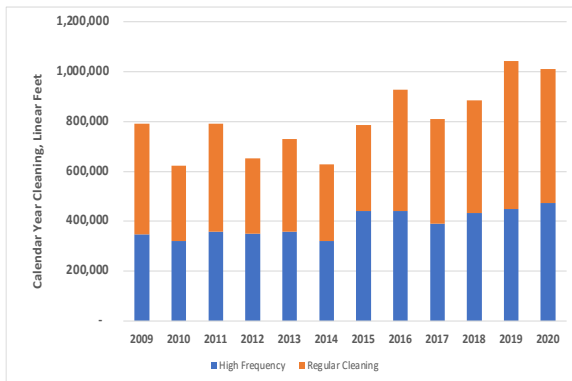
Element 9 – Monitoring, Measurement and Program Modification

- Update procedures and activities regularly
- Monitor/measure effectiveness
- Identify and illustrate spill trends



Sewer System Management Plan

Element 9 – Monitoring, Measurement and Program Modification



Sewer System Management Plan

Conclusions

- Order may require additions to Plans
- All changes and revisions based upon size and complexity
- Order has eliminated some old requirements
- Only Element 6 requires revisions by effective date
- Element 6 revisions do not require governing board adoption
- Plan changes only required following next Plan audit
- Enrollees needs to evaluate procedures needed to support Plan
- All information presented is preliminary to support future training
- Don't delay, get started!!!
- Seek clarification of any unclear areas – SWRCB staff, Summit Partners, future training



Questions

Please insert any questions into
your Zoom Q&A on your browser

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