



Changes to Sewer System Management Plan Audits

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What is the goal of the Sewer System Management Plan?

- Plan and schedule to properly operate and maintain all parts of sewer system
- Reduce and prevent spills
 - Number and volume of all events
 - Spills reaching surface waters
- Contain and mitigate impacts of spills that do occur



WAIT,
Why Are We Doing This Again?



Sewer System Management Plan Audits

- Locations of audit requirements in General Order.

5. Specifications

Attachment D – Sewer
System Management
Plan - Required Elements

Attachment E1 – Notification,
Monitoring, Reporting and
Recordkeeping Requirements

5.4 Sewer System
Management Plan Audits

D.10 – Internal Audits

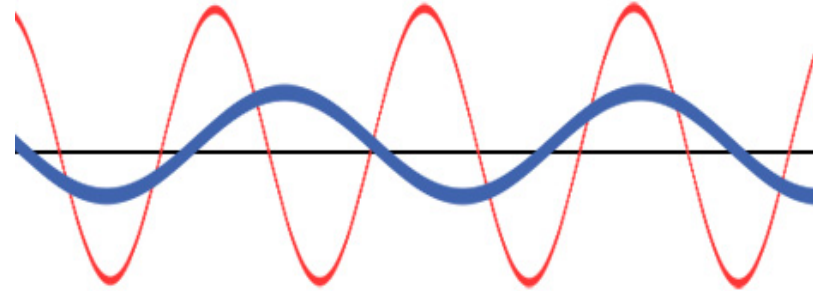
*Plan shall include internal
audit procedures,
appropriate to the size and
performance of the system*

E1.3.10 – Audit Reporting
Requirements

E1.4.7 – Audit
Recordkeeping

Specification – Sewer System Management Plan Audits (5.4)

- Conduct audit of Plan and implementation
- Minimum frequency of once every **3** years
 - For period after the end of last required audit period



Specification – Appropriately Scaled Audit (5.4)

“The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills.”



Larger system

or

More spills

deeper audit

deeper inquiry

more detail

Specification – Operator Involvement (5.4)

“The Enrollee’s sewer system operators must be involved in completing the audit.”

- *Audit report shall include a statement that sewer system operators’ input on the audit findings has been considered (5.4)*



Specification – Minimum Requirements of Audit (5.4)

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.*

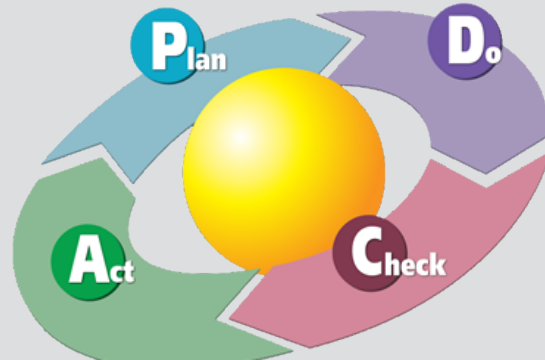


Specification – Audit Report (5.4)

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.*

- Simple “Yes/No” questionnaire not adequate
- Describes a Plan-Do-Check-Act process



Reporting Requirement - Audit Report Submission (E1.3.10)

- Submit audit report in CIWQS (E1.3.10)
 - Within 6 months of end of required 3-year audit period
- Late Audit Report
 - Update CIWQS and select the justification for not conducting the Audit
 - Notify Regional Water Board of the justification for late Audit
 - Submit late Audit as required
 - Comply with subsequent Audit requirements and due dates corresponding with the original audit cycle.



**OWN
IT.**

**KEEP IT
SIMPLE.**

**GET IT
DONE.**

Recordkeeping Requirement - Audit Records (E1.4.7)

The Enrollee shall maintain, at minimum, the following records pertaining to its Sewer System Management Plan audits, and other internal audits:

- Completed audit documents and findings;
- Name and contact information of staff and/or consultants that conducted or involved in the audit; and
- Follow-up actions based on audit findings.



Questions?

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