

# Compliance with the Reissued Sanitary Sewer System WDR Beyond June 5, 2023



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# Content

- 1. Preparing for your next SSMP Audit/Update**
- 2. Preparing for an unannounced Inspection (exercise)**

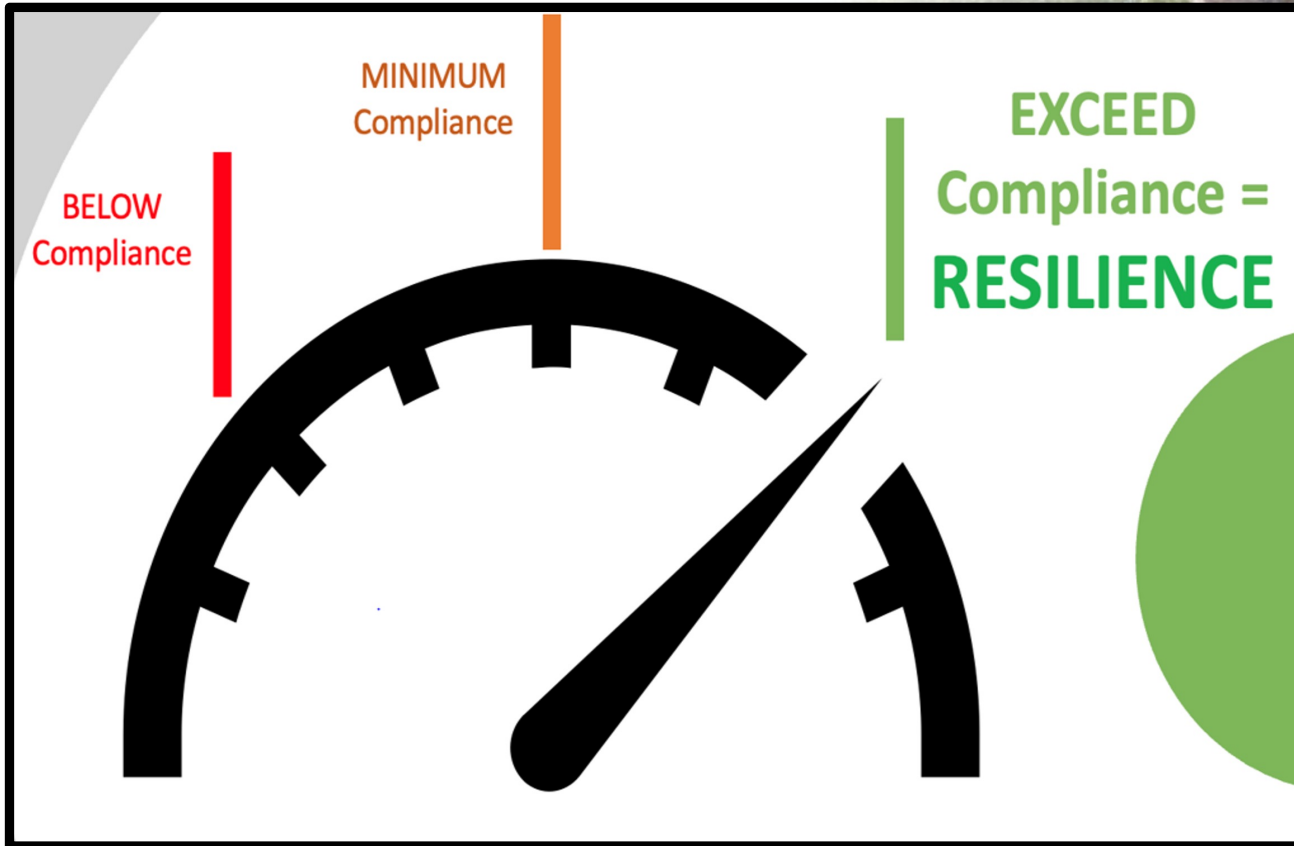


# LIVE POLLING!



# 1. Preparing for your next SSMP Audit/Update





WHERE IS YOUR AGENCY?

“Implement” (appears 52 times)

“Enforce” (appears 30 times)

“Shall”. (appears 123 times)

### Permit Expectations

- Past (“reactive”) and future (“proactive”) posture
- Notification/reporting violations need to be reduced!
- Know your potential climate vulnerabilities
- Answer questions about COVID-19/staffing/Ops
- Pre-Inspection Quest (high expectations/prepare!)

# Reissued WDR - Takeaways

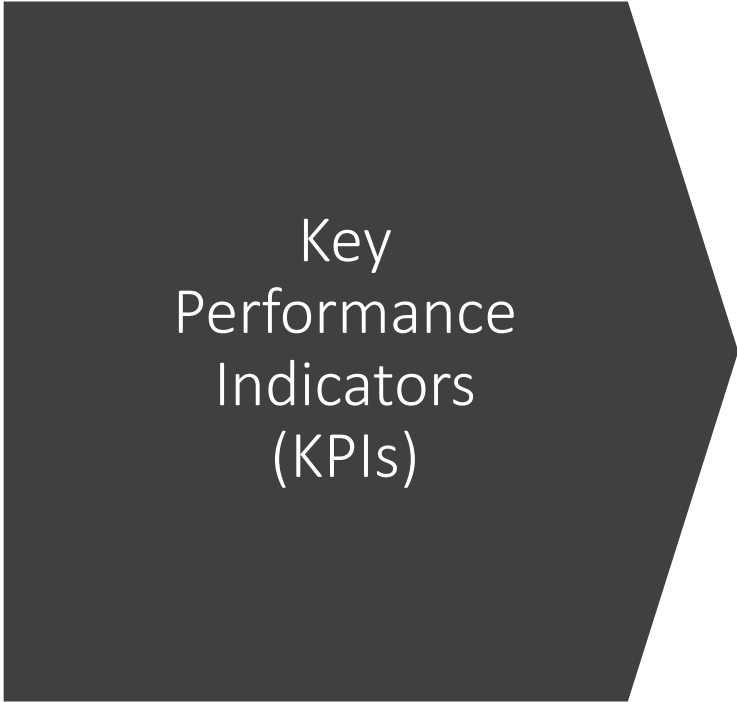
**1. Preparing for  
your next SSMP Audit/Update**

# TIPS FOR MEASURING EFFECTIVENESS



**1. Preparing for your next SSMP Audit/Update**

# TIPS FOR MEASURING EFFECTIVENESS



## List of KPIs

KPI 1.1 .....	1-2
KPI 1.2 .....	1-2
KPI 1.3 .....	1-2
KPI 1.4 .....	1-2
KPI 1.5 .....	1-3
KPI 1.6 .....	1-3
KPI 1.7 .....	1-3
KPI 1.8 .....	1-4
KPI 1.9 .....	1-4
KPI 1.10 .....	1-4
KPI 1.11 .....	1-4
KPI 1.12 .....	1-4
KPI 1.13 .....	1-5
KPI 14.1 .....	1-5

[https://westbaysanitary.org/wp-content/uploads/2022/09/WBSD\\_SSMP2022\\_Final.pdf](https://westbaysanitary.org/wp-content/uploads/2022/09/WBSD_SSMP2022_Final.pdf)

September 2022  
SSMP

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West Bay Sanitary District



# TIPS FOR MEASURING EFFECTIVENESS

Elements <sup>7</sup>	Key Performance Indicators (KPIs)		
<u>1.0 Goals</u>	<u>KPI 1.1</u>	Annual review of gallons sewage spilled vs. gallons sewage conveyed	<i>Future measurement</i>
	<u>KPI 1.2</u>	Annual review of gallons sewage spilled vs. gallons sewage recovered	<i>Future measurement</i>
	<u>KPI 1.3</u>	Annual review of # spills prevented	<i>Future measurement</i>
	<u>KPI 1.4</u>	Annual review of State Water Board/San Francisco Bay Regional Board Collection System Questionnaires to ensure compliance with all SSS WDRs elements.	<i>Future measurement</i>

# TIPS FOR MEASURING EFFECTIVENESS

<u>10.0 Audits</u>	<u>KPI 10.1</u>	Were program audits completed as required per compliance schedule?	<i>Measured by Review of audit dates to determine if audit was performed on or before required date.</i>
	<u>KPI 10.2</u>	Did the audit evaluate the effectiveness of the SSMP?	<i>Measured by Review of audit results for effectiveness.</i>
	<u>KPI 10.3</u>	Did the audit evaluate the compliance of the SSMP for all elements per SSS WDRs requirements?	<i>Measured by Review of audit results for compliance.</i>

**Notice!** As the state transitions from the COVID-19 emergency, please contact your local Water Board to arrange necessary file reviews. ✕



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## Sanitary Sewer Overflow (SSO) Reduction Program

### Available Documents

This page is intended to provide information to enrollees and the general public. If there are documents that you would like to see posted on this page please contact the [SSO Reduction Program Staff](#).

### General Information

- [Enrollee's Guide to the SSO Database](#)
- [Guide for Developing and Updating of Sewer System Management Plans \(SSMPs\)](#)

### Outreach

#### Sewer System Management Plan (SSMP)

- [SSMP Two-Year Audit](#)
  - [USD Sewer System Management Plan 2014 SSMP Audit](#)
- [Emergency Response Plan](#)
  - [Orange County Sewer Spill Estimation Guide](#)
  - [USD SSO Response - Field Documentation](#)

#### SSO Reduction Practices

- [Final Core Attributes](#)
- [Inflow and Infiltration \(I&I\) Sanitary Sewer Fact Sheet](#)
- [SSO BMPs Reduction Strategies from Bay Area Clean Water Agencies \(BACWA\)](#)
- [Private Property Infiltration and Inflow Fact Sheet](#)

#### Data

- [List of Enrollees with no SSOs reported](#)

#### Pre-Inspection

- [Pre-Inspection Questionnaire 2.0](#)
- [Sanitary Sewer Collection System Inspection Check List](#)



**1. Preparing for your next SSMP Audit/Update**

**SSMP Auditing Tools** - Best practice tips recommended by Fischer Compliance LLC for enhancing SSMP Audits using tools for checking compliance and evaluating enforcement data customized for each regional water board.



SSMP Auditing Tools 1 1 HD 1080p WDRs

# AUDITING TOOLS

1 Share

Watch on  YouTube

FISCHER<sup>LLC</sup>  
COMPLIANCE  
REGULATORY BEST PRACTICES

AGENCY SSOs/100 miles (region) SSOs/100 miles (state) SSOs/100 miles (best practice agencies)

## Don't miss out on the latest from Fischer Compliance!

Find out when the regulations change and the best practices for staying up-to-date on wastewater compliance.

[Sign Up](#)

**1. Preparing for your next SSMP Audit/Update**

# YOUTUBE (FISCHER COMPLIANCE LLC)



## What You Will Learn

1. Understanding Enforcement
2. Auditing your SSMP
3. Avoiding Violations
4. Being Ready for Inspectors
5. Record Keeping and Training



**1. Preparing for  
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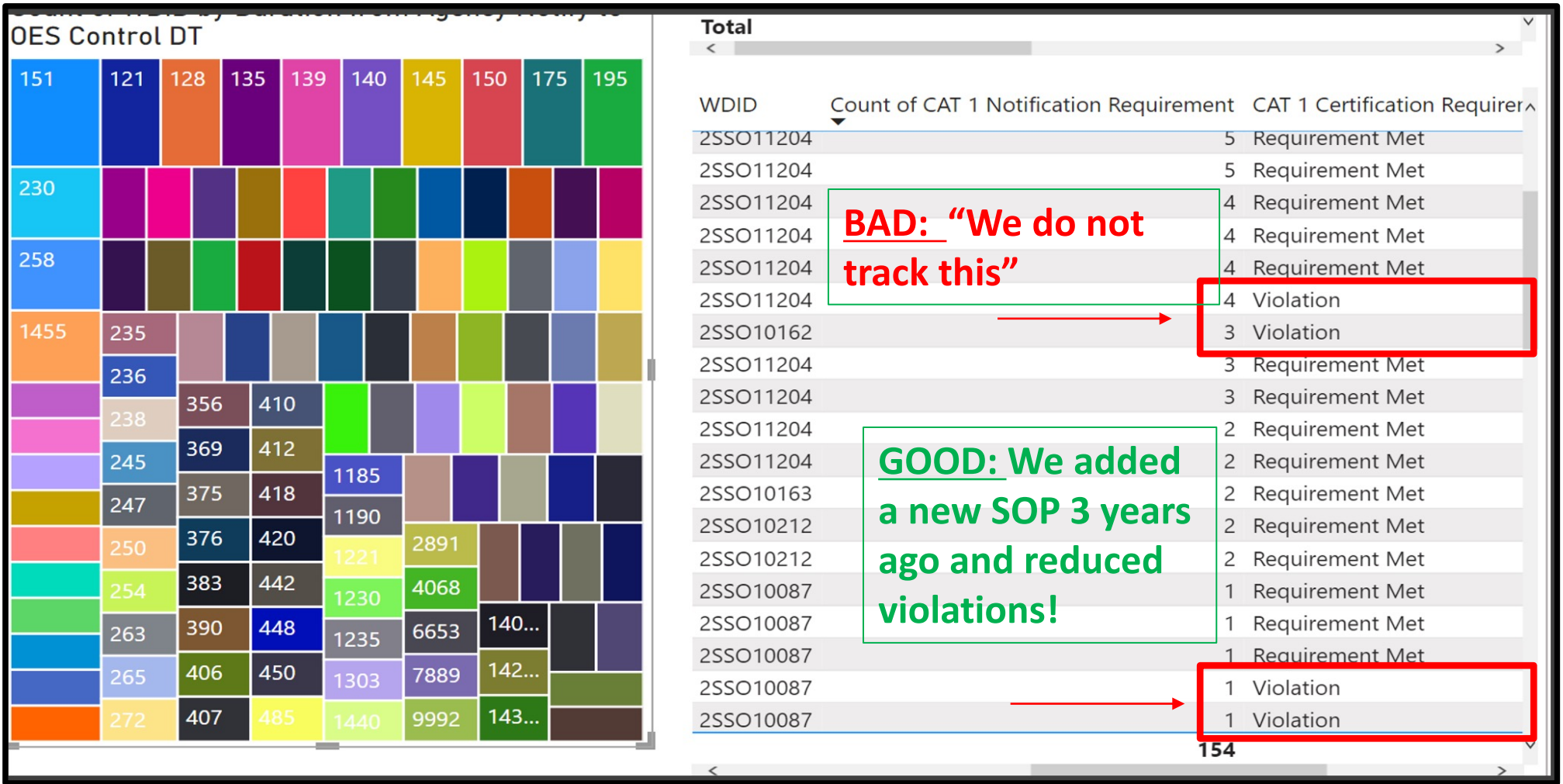
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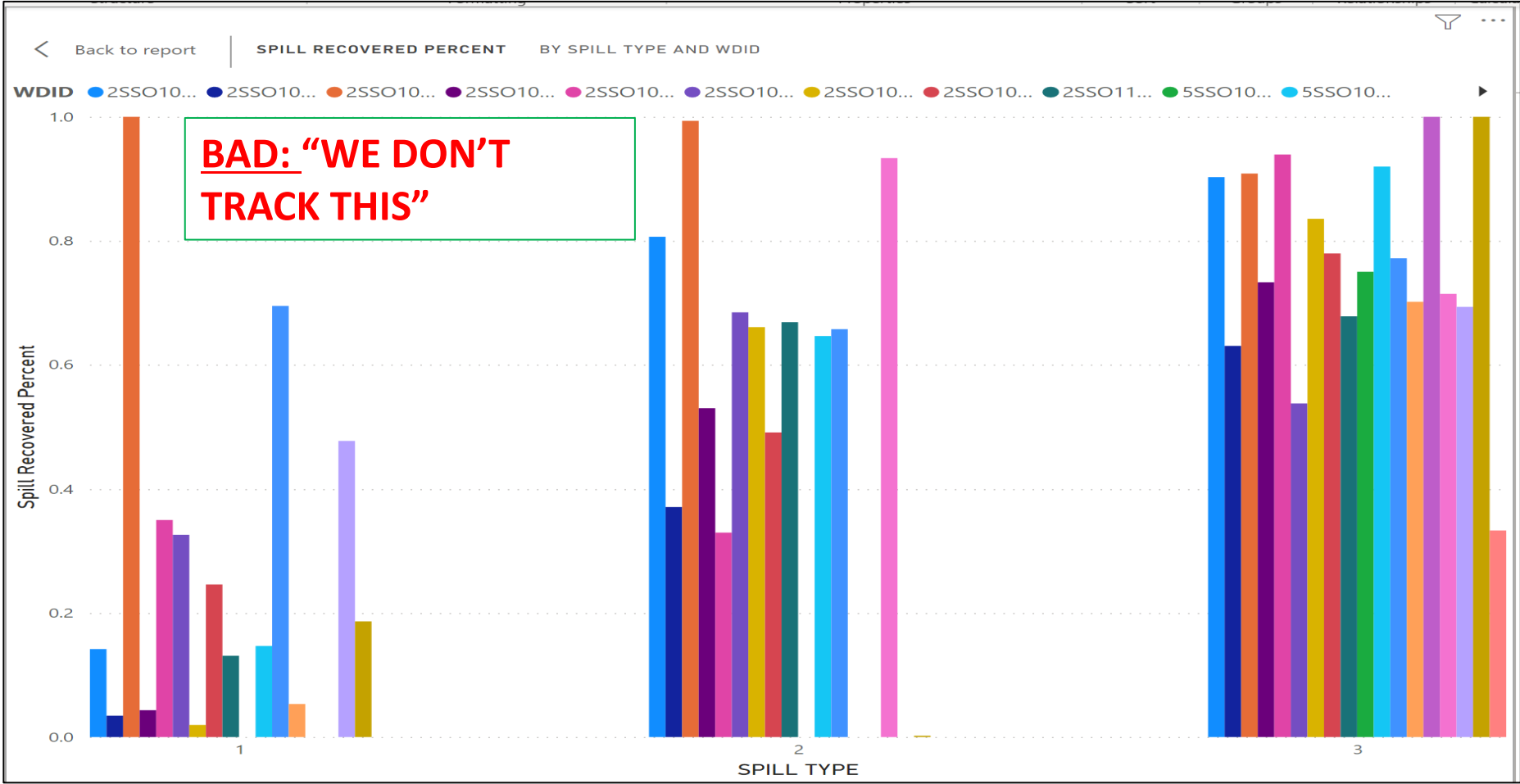
## 2. Preparing for an unannounced Inspection (exercise)



# Notification/Certification Compliance



# Agency Spill Recovery Compliance (%)



**BAD: "WE DON'T TRACK THIS"**

**GOOD: "WE CHECK THIS DATA FOR OUR SSMP AUDITS"!**

**2. Preparing for an unannounced Inspection (exercise)**





**EXAMPLE ENFORCMENT FACTORS (Scale, 0-5)**

1. SPILL PREVENTION

2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION

PRE-SPILL

SPILL



**2. Preparing for an unannounced Inspection (exercise)**



**EXAMPLE ENFORCMENT FACTORS (Scale, 0-5)**

1. SPILL PREVENTION

2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION

1.1 (Inspections, gravity)  
1.2 (Inspections, pump stations)  
1.3 (Inspections, force mains)

**5**

PRE-SPILL

SPILL



2. Preparing for an unannounced Inspection (exercise)



**EXAMPLE ENFORCMENT FACTORS (Scale, 0-5)**

1. SPILL PREVENTION

2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION

PRE-SPILL

1.1 (Inspections, gravity)  
1.2 (Inspections, pump stations)  
1.3 (Inspections, force mains)

5

1.4 (Cleaning, gravity)  
1.5 (Cleaning, pump stations)  
1.6 (Cleaning, force mains)

5

SPILL

2. Preparing for an unannounced  
Inspection (exercise)



**EXAMPLE ENFORCMENT FACTORS (Scale, 0-5)**

1. SPILL PREVENTION

2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION

PRE-SPILL

1.1 (Inspections, gravity)  
1.2 (Inspections, pump stations)  
1.3 (Inspections, force mains)

5

1.4 (Cleaning, gravity)  
1.5 (Cleaning, pump stations)  
1.6 (Cleaning, force mains)

5

1.7 (Critical parts, gravity)  
1.8 (Critical parts, pump stations)  
1.9 (Critical parts, force mains)

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SPILL

2. Preparing for an unannounced  
Inspection (exercise)



Thank you  
CVVCA....and

Thank you all for  
attending!



CONTACTS:

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