

OJAI VALLEY SANITARY DISTRICT
SEWER SYSTEM MANAGEMENT PLAN
CALIFORNIA STATE WATER RESOURCES CONTROL BOARD
ORDER NO. 2006.0003-DWQ



HISTORY:

August 2009
Revised December 2013
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PREPARED BY:

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1072 Tico Road
Ojai, CA 93023

FINAL

OJAI VALLEY SANITARY DISTRICT

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1072 Tico Road

Ojai, California 93023

Pursuant to the provisions of the
CALIFORNIA STATE WATER RESOURCES CONTROL BOARD
ORDER NO. 2006.0003-DWQ
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS (WDR)
FOR SANITARY SEWER SYSTEMS

August 2009

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AB	Assembly Bill
BAT	Best Available Technology
BMP	Best Management Practice
Cal OES	California Office of Emergency Services
CCTV	Closed-Circuit Television
CFR	Code of Federal Regulations
CIP	Capital Improvement Plan
CIWQS	California Integrated Water Quality System
CM	Corrective Maintenance
CMMS	Computerized Maintenance Management System
CSRMA	California Sanitation Risk Management Authority
CWEA	California Water Environment Association
District	Ojai Valley Sanitary District
DOP	Disaster Operations Plan
FOG	Fats, Oils, and Grease
GIS	Geographical Information System
GPS	Global Positioning System
GWDR	General Waste Discharge Requirements also referred to as the Waste Discharge Requirements (WDR)
I&I	Inflow & Infiltration
MRP	Monitoring and Reporting Program
NPDES	National Pollutant Discharge Elimination System
NOI	Notice of Intent
O&M	Operation and Maintenance
Order	SWRCB Order No. 2006-0003-DWQ adopted May 2, 2006
PD	Predictive Maintenance
PM	Preventative Maintenance
PMP	Preventative Maintenance Program
R&R	Rehabilitation and Replacement
RWQCB	Regional Water Quality Control Board
SCADA	Supervisory Control and Data Acquisition
SOP	Standard Operating Procedure <u>or</u> Standard Maintenance Procedure
SSO	Sanitary Sewer Overflow and any sewer spill or overflow of sewage
SSMP	Sewer System Management Plan
SWRCB	State Water Resources Control Board
VC-EHD	Ventura County Environmental Health Department
WDR	Waste Discharge Requirements also referred to as the General Waste Discharge Requirements (GWDR)
WWTP	Wastewater Treatment Plant

On May 2, 2006, the SWRCB adopted Order Number 2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, that requires all publicly owned sewage collection systems having more than one mile of pipeline to develop, implement and fund a Sewer System Management Plan (SSMP). The SSMP establishes the minimum requirements under which a public collection system must be operated and maintained. The purpose of the Order is to prevent sanitary sewer overflows (SSOs) by providing a plan and schedule for measures to be implemented for SSO prevention, effective spill cleanup, and spill reporting.

The Ojai Valley Sanitary District (OVSD) operates a sanitary collection system that is comprised of 120 miles of collection pipelines ranging from 6-inch to 24-inch in size. The majority of the system is gravity with 70% of the system being comprised of VCP and 22% of the system being PVC pipe. Private laterals connect private properties to the District's collection system but are not part of the District's collection system. Maintenance and repair of all private laterals is the responsibility of the private property owner up to the point of connection to the District's collection system. To supplement the gravity system, OVSD operates and maintains five (5) sewage lift stations and 14,102 feet of associated force mains. The system also contains nine sewage siphons ranging in length from 82 feet to 3,300 feet. Line cleaning, enhanced maintenance area cleaning, response to blockages, lift station and siphon maintenance are provided by District crews and equipment. District personnel provide first response, recovery and cleanup should an SSO occur.

Sewage collected by the OVSD collection system flows to a 3.0 million gallon per day wastewater treatment facility owned and operated by the District. Tertiary treated effluent is discharged to the Ventura River under the District's NPDES permit

To develop the first SSMP in 2009, the District contracted for the services of an outside consultant to perform a detailed analysis of the District's operation and maintenance, and management, of the District's sanitary sewer collection system. The purpose of the analysis was to provide an assessment of the Ojai Valley Sanitary District's overall operation and maintenance policies and procedures and to determine if those policies and procedures were in compliance with the new Order. To provide this assessment, the consultant reviewed all pertinent District documentation and interviewed key District staff. Each element of the Order was addressed to determine District compliance. The analysis directly followed the Order and its requirements and provided a specific detailed analysis of the level of compliance that the District has achieved for every element of the Order. When compliance deficiencies were found, recommendations were included on how to rectify the deficiencies. A follow-up evaluation (update) was completed in December 2012 by District staff and the SSMP was revised by an outside consultant in December 2013. The revised 2013 SSMP was accepted by the District in January 2014. The 2013 SSMP was officially certified by the District Board in June 2018. District staff conducted an audit of the 2013 SSMP and submitted the audit report to the District Board. The 2018 SSMP Audit Report was certified by the District Board in June 2018.

The analysis found that the District had done a commendable job in managing, operating and maintaining its wastewater collection system and was very close to full compliance with the new regulation. The District pursued a very aggressive regiment to ensure that full compliance was reached by the Order's prescribed milestones. The December 2012 review noted that in April

2011 the District released an updated Strategic Plan that identifies and plans for actions necessary to assure that the District remains productive and successful. The District also updated their Operations Plan in June 2011 that covers all aspects, including the collection system, of the District's operation. Also, the District's Sewage Spill Prevention and Response Plan was updated in June 2008, February 2012, and again December 2013 to reflect improvements in the District's spill response effectiveness and spill reporting. Spill notification procedures were also revised.

At least annually the District reviews its updated Collection System Capital Improvement Plan (CIP). The CIP provides the District with a complete evaluation of its collection system infrastructure and includes a prioritized rehabilitation or replacement projects list, including budgetary projections. The District Board has authorized District staff to continue with sewer rehabilitation and replacement projects with an annual budget of approximately \$1M to address deficiencies and reduce I&I flows. To complement the initial CIP, the District commissioned a hydraulic analysis of the entire collection system to ensure the collection system has sufficient capacity. The hydraulic model was prepared and is being refined to enhance its usability by District staff.

The District has replaced its computerized maintenance management system with a new system to improve the maintenance activities, work order issuance, and maintenance record keeping. To assist with its ongoing collection system maintenance, the District has developed a written Sanitary Collection System Operations and Maintenance Program that incorporates the District's standard operating procedures (SOP) and a written Inflow and Infiltration (I&I) Program. These enhancements coupled with the practices and procedures the District has developed over the years provide the rate payers of the Ojai Valley Sanitary District with an efficient and well-run collection system.

The District's SSMP is built around the WDR with each chapter dedicated to a single element required by the Order. Each chapter, or element, has the language from the Order followed by a Compliance Summary that briefly explains how the District complies with that element of the Order. The Compliance Summary is followed by the Compliance Documents section which list the documents or programs, and their location, that the District utilizes to obtain compliance. This approach was taken to provide easier document management and to provide a plan that is easier to understand for the general public and for District staff.

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

In July 2013, the SWRCB made substantial changes to the Monitoring and Reporting requirements for sanitary sewer overflows. The District has incorporated these new requirements and they are discussed in Chapter 2 sections 2.2.1 and 2.2.2 that details how the District is organized to respond and report sanitary sewer overflows.

DEFINITIONS

1. **Sanitary sewer overflow (SSO)** - Any overflow, spill, release, discharge or diversion of untreated or partially treated wastewater from a sanitary sewer system. SSOs include:
 - a. Overflows or releases of untreated or partially treated wastewater that reach waters of the United States;
 - b. Overflows or releases of untreated or partially treated wastewater that do not reach waters of the United States; and
 - c. Wastewater backups into buildings and on private property that are caused by blockages or flow conditions within the publicly owned portion of a sanitary sewer system.

2. **Sanitary sewer system** – Any system of pipes, pump stations, sewer lines, or other conveyances, upstream of a wastewater treatment plant headworks used to collect and convey wastewater to the publicly owned treatment facility. Temporary storage and conveyance facilities (such as vaults, temporary piping, construction trenches, wet wells, impoundments, tanks, etc.) are considered to be part of the sanitary sewer system, and discharges into these temporary storage facilities are not considered to be SSOs.

For purposes of this Order, sanitary sewer systems include only those systems owned by public agencies that are comprised of more than one mile of pipes or sewer lines.

3. **Enrollee** - A federal or state agency, municipality, county, district, and other public entity that owns or operates a sanitary sewer system, as defined in the general WDRs, and that has submitted a complete and approved application for coverage under this Order.

4. **SSO Reporting System** – Online spill reporting system that is hosted, controlled, and maintained by the State Water Board. The web address for this site is <http://ciwqs.waterboards.ca.gov>. This online database is maintained on a secure site and is controlled by unique usernames and passwords.

5. **Untreated or partially treated wastewater** – Any volume of waste discharged from the sanitary sewer system upstream of a wastewater treatment plant headworks.

-
6. **Satellite collection system** – The portion, if any, of a sanitary sewer system owned or operated by a different public agency than the agency that owns and operates the wastewater treatment facility to which the sanitary sewer system is tributary.
 7. **Nuisance** - California Water Code Section 13050, subdivision (m), defines nuisance as anything which meets all of the following requirements:
 - a. Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
 - b. Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
 - c. Occurs during, or as a result of, the treatment or disposal of wastes.

PROHIBITIONS AND PROVISIONS

This section describes the sewage discharge prohibitions and thirteen provisions prescribed in the Order.

Prohibitions

To meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, the discharger is required to comply with the following prohibitions:

1. Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.
2. Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is prohibited.

Provisions

The discharger must meet the following thirteen provisions:

1. The Enrollee must comply with all conditions of this Order. Any noncompliance with this Order constitutes a violation of the California Water Code and is grounds for enforcement action.
2. It is the intent of the State Water Board that sanitary sewer systems be regulated in a manner consistent with the general WDRs. Nothing in the general WDRs shall be:
 - a. Interpreted or applied in a manner inconsistent with the Federal Clean Water Act, or supersede a more specific or more stringent state or federal requirement in an existing permit, regulation, or administrative/judicial order or Consent Decree;
 - b. Interpreted or applied to authorize an SSO that is illegal under either the Clean Water Act, an applicable Basin Plan prohibition or water quality standard, or the California Water Code;
 - c. Interpreted or applied to prohibit a Regional Water Board from issuing an individual NPDES permit or WDR, superseding this general WDR, for a sanitary sewer system, authorized under the Clean Water Act or California Water Code; or
 - d. Interpreted or applied to supersede any more specific or more stringent WDRs or enforcement order issued by a Regional Water Board.

3. The Enrollee shall take all feasible steps to eliminate SSOs. In the event that an SSO does occur, the Enrollee shall take all feasible steps to contain and mitigate the impacts of an SSO.
4. In the event of an SSO, the Enrollee shall take all feasible steps to prevent untreated or partially treated wastewater from discharging from storm drains into flood control channels or waters of the United States by blocking the storm drainage system and by removing the wastewater from the storm drains.
5. All SSOs must be reported in accordance with Section G of the general WDRs.
6. In any enforcement action, the State and/or Regional Water Boards will consider the appropriate factors under the duly adopted State Water Board Enforcement Policy. Consistent with the Enforcement Policy, the State and/or Regional Water Boards must consider the Enrollee's efforts to contain, control, and mitigate SSOs when considering the California Water Code Section 13327 factors. In assessing these factors, the State and/or Regional Water Boards will also consider whether:
 - a. The Enrollee has complied with the requirements of this Order, including requirements for reporting and developing and implementing a SSMP;
 - b. The Enrollee can identify the cause or likely cause of the discharge event;
 - c. There were no feasible alternatives to the discharge, such as temporary storage or retention of untreated wastewater, reduction of inflow and infiltration, use of adequate backup equipment, collecting and hauling of untreated wastewater to a treatment facility, or an increase in the capacity of the system as necessary to contain the design storm event identified in the SSMP. It is inappropriate to consider the lack of feasible alternatives, if the Enrollee does not implement a periodic or continuing process to identify and correct problems.
 - d. The discharge was exceptional, unintentional, temporary, and caused by factors beyond the reasonable control of the Enrollee;
 - e. The discharge could have been prevented by the exercise of reasonable control described in a certified SSMP for:
 - i. Proper management, operation and maintenance;
 - ii. Adequate treatment facilities, sanitary sewer system facilities, and/or components with an appropriate design capacity, to reasonably prevent SSOs (e.g., adequately enlarging treatment or collection facilities to accommodate growth, infiltration and inflow (I&I), etc.);
 - iii. Preventive maintenance (including cleaning and fats, oils, and grease (FOG) control);
 - iv. Installation of adequate backup equipment; and

- v. Inflow and infiltration prevention and control to the extent practicable.
 - f. The sanitary sewer system design capacity is appropriate to reasonably prevent SSOs.
 - g. The Enrollee took all reasonable steps to stop and mitigate the impact of the discharge as soon as possible.
7. When a sanitary sewer overflow occurs, the Enrollee shall take all feasible steps and necessary remedial actions to: 1) control or limit the volume of untreated or partially treated wastewater discharged, 2) terminate the discharge, and 3) recover as much of the wastewater discharged as possible for proper disposal, including any wash down water.
- The Enrollee shall implement all remedial actions to the extent they may be applicable to the discharge and not inconsistent with an emergency response plan, including the following:
- a. Interception and rerouting of untreated or partially treated wastewater flows around the wastewater line failure;
 - b. Vacuum truck recovery of sanitary sewer overflows and wash down water;
 - c. Cleanup of debris at the overflow site;
 - d. System modifications to prevent another SSO at the same location;
 - e. Adequate sampling to determine the nature and impact of the release; and
 - f. Adequate public notification to protect the public from exposure to the SSO.
8. The Enrollee shall properly, manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.
9. The Enrollee shall allocate adequate resources for the operation, maintenance, and repair of its sanitary sewer system by establishing a proper rate structure, accounting mechanisms, and auditing procedures to ensure an adequate measure of revenues and expenditures. These procedures must be in compliance with applicable laws and regulations and comply with generally accepted accounting practices.
10. The Enrollee shall provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events. Capacity shall meet or exceed the design criteria as defined in the Enrollee's System Evaluation and Capacity Assurance Plan for all parts of the sanitary sewer system owned or operated by the Enrollee.

11. The Enrollee shall develop and implement a written Sewer System Management Plan (SSMP) and make it available to the State and/or Regional Water Board upon request. A copy of this document must be publicly available at the Enrollee's office and/or available on the Internet. This SSMP must be approved by the Enrollee's governing board at a public meeting.
12. In accordance with the California Business and Professions Code Sections 6735, 7835, and 7835.1, all engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. Specific elements of the SSMP that require professional evaluation and judgments shall be prepared by or under the direction of appropriately qualified professional and shall bear the professional(s)' signature and stamp.
13. The mandatory elements of the SSMP are specified in the following chapters. However, if the Enrollee believes that any element of this section is not appropriate or applicable to the Enrollee's sanitary sewer system, the SSMP program does not need to address that element. The Enrollee must justify why that element is not applicable. The SSMP must be approved by the deadlines listed in the SSMP Time Schedule.

GOALS

This chapter describes the goals of the Sewer System Management Plan (SSMP). The goal of the SSMP is to provide a documented plan that describes all collection system activities and programs employed by an Enrollee to ensure proper management of all collection system assets. Implementing an SSMP will ensure proper management, operation, and maintenance of all parts of the sanitary sewer system, ultimately helping to reduce and prevent SSOs, as well as mitigate any SSOs that do occur including meeting all applicable regulatory notification and reporting requirements. Commitment to continual improvement will ensure that the SSMP is both a living and sustainable document that is continually updated, revised, and tailored to meet the District's needs. The District is required to comply with the "State Water Resources Control Board (SWRCB), Order No. 2006-0030 DWQ" (Order) on General Waste Discharge Requirements for publicly owned sewage collection agencies having more than one mile of collection pipelines.

I.1 Purpose

This element describes the District's stated goals for its SSMP and is intended to clarify the District's desired level of service that is being provided to its customers. The purpose of the Order is to prevent sanitary sewer overflows (SSOs). The District is required to prepare and maintain the SSMP to support this purpose

I.2 Goals

Traditional goals that the District has committed to maintain that will effectively and efficiently implement and comply with the goals of the WDR include:

- a. Staff will document, integrate, and fine-tune existing collection system operation and maintenance activities as necessary into this SSMP to comply with the WDR.
- b. Staff will respond to blockages / SSO's within 30 minutes of receiving the report.
- c. Line cleaning will be conducted on all 6-inch to 12-inch diameter mainlines every two years to reduce the potential for blockages.
- d. Lines 15-inch to 24-inch diameter will be cleaned every 6 years.
- e. CCTV inspection was performed on the entire collection system during 2001 to 2004, and a second round was completed during 2006 to 2013. Staff will re-CCTV 6-inch to 18-inch diameter lines over 30 years old, every 6-10 years. In addition, staff performs CCTV for post construction, FOG program, Root Control and Enhanced Maintenance Area efforts,
- f. Problem areas identified as "Hot Spots" or "Enhanced Maintenance Areas" will be scheduled for increased cleaning frequency sufficient to prevent blockages.
- g. Staff will continue the scheduled application of chemical root inhibitors to known problem areas and use CCTV inspections to identify additional areas of concern.

The District established the above-mentioned goals to reduce and/or eliminate preventable SSOs. These goals are being accomplished through the development and implementation of this SSMP that address the specific needs of the District. Should a spill occur, the District is committed to responding to and mitigating any such event and ensuring that all required notification and reporting is completed consistent with the Order.

As required by the Order, a copy of the SSMP is maintained at the District’s Administrative Office and is available to the public, state and RWQCB via the District’s website or upon request (as discussed in, Section D, Provisions, Item 11). The SSMP is available to the District’s collection system operations and maintenance personnel at all times.

The District will also comply with the SSO “Monitoring and Reporting Program (MRP) component of Order No. 2006-0030 DWQ” and all future revisions, included by reference in the Order. A copy of the Monitoring Program is also available at the District’s Administrative Office.

I.3 About This Document

The District has prepared this SSMP to ensure compliance with the Order. To facilitate document management and to provide a program that is easier to understand for the general public and for District staff, the SSMP document is divided into chapters with each chapter dedicated to a specific element of the WDR. Each chapter contains a specific requirement taken from the WDR and the plan the District utilizes to comply with that requirement. The Compliance Summary of each chapter summarizes the programs or activities that the District utilizes for compliance. The Compliance Documents section lists the supporting documents, and their location, that the District has developed as part of its SSMP. Roles and Responsibilities (located only in Chapter 3 – Organization) contain the title and description of duties for the District staff positions responsible for developing and/or implementing the elements of the SSMP. Actual contact information for the listed job titles is maintained as a separate file available at the District’s Administrative Office. This is done to facilitate staff changes and protect staff privacy.

ORGANIZATION

This chapter describes the District’s organization and chain of communication. The Order requires the following:

- a. The name of the responsible or authorized representative as described in Section J of this Order.
- b. The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and
- c. The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, Ventura County Environmental Health Agency, Regional Water Quality Control Board, and/or California Office of Emergency Services (Cal OES)).

2.1 Name of Responsible or Authorized Representative

Operations Manager, Richard Nack, is the District’s authorized representative listed on the Notice of Intent (NOI) and to provide redundancy for reporting, the District has designated both the Operations Manager and the Collection Systems Supervisor, Mark Chauvel, as responsible representatives for the certification of SSO reports and the SSMP elements.

2.1.1 Administrative and Maintenance Positions

The Order requires the names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. Employee contact information is kept in a separate file to facilitate updating as employee positions change. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation. This information is offered in this Chapter of the SSMP.

2.1.2 Compliance Summary

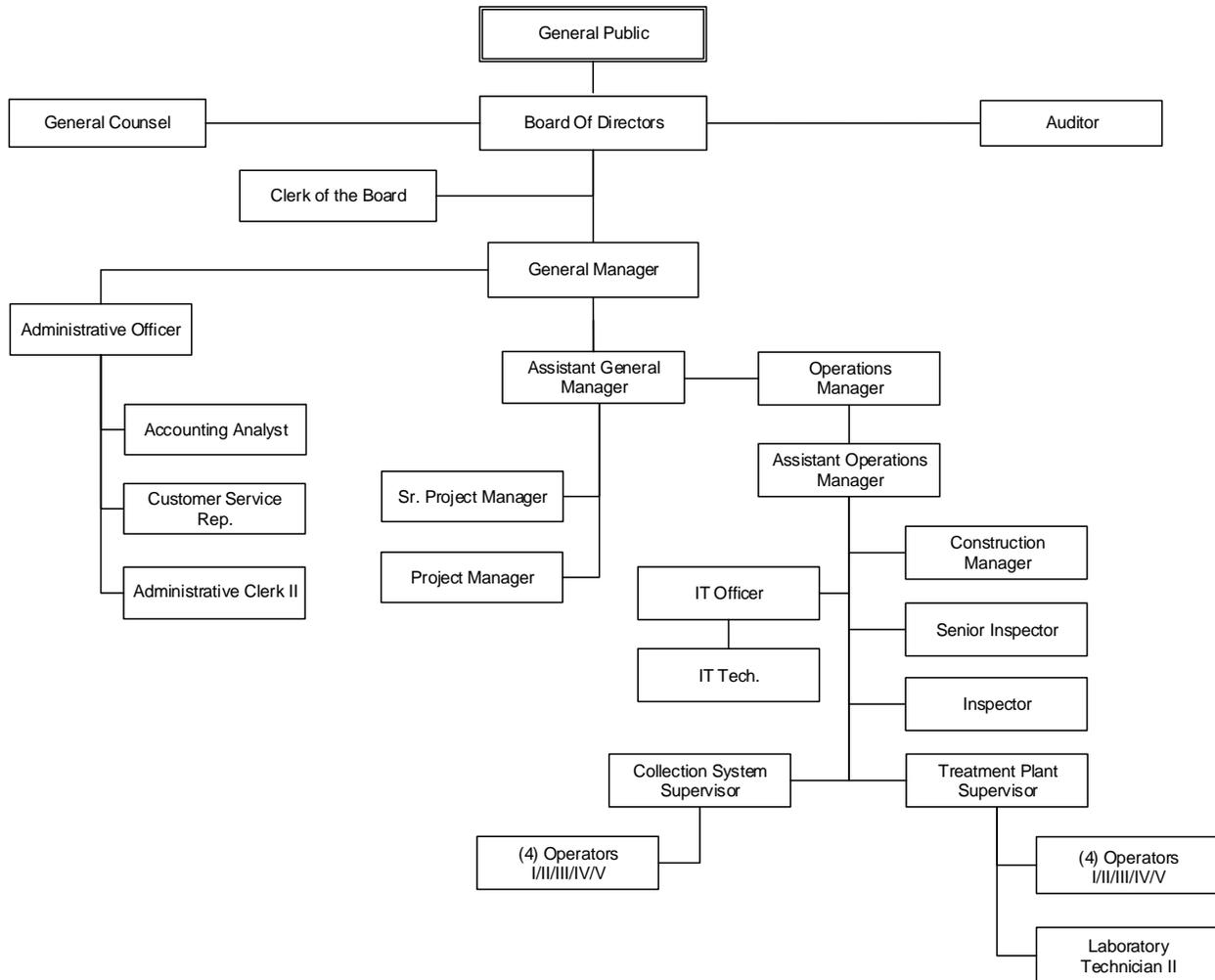
The Operations Manager, under the direction of the General Manager, administers the District’s sanitary collection system. The District operates and maintains approximately 120 miles of sanitary sewer and 5 lift stations within the collection system, and a 3 mgd advanced tertiary wastewater treatment plant with effluent discharge to the Ventura River. The District maintains adequate staff and equipment to maintain all of its collection system facilities. The Operations Manager is also responsible for the development and implementation of the various elements of the SSMP and reviews of efficiency of each of the SSMP’s components. The Collection Systems Supervisor is responsible for overseeing the operation of the maintenance crews, including their training, and reports to the Operations Manager. The Collection Systems Supervisor assists the Operations Manager with the field implementation of the SSMP components.

2.1.3 Compliance Documents

The following detailed organizational chart shows the structure and relationship of all current District positions involved with the development or implementation of the SSMP. The identified positions in the organizational chart provide sufficient staffing to operate and maintain the Districts' sewer system on a sustainable basis, and to comply with all requirements of the Order. Updated organizational charts, staff titles, and staff contact information are maintained at the District's Administrative Office.

SSMP IMPLEMENTATION

Organizational Chart



2.1.4 Roles and Responsibilities

The roles and responsibilities of each position in the organization chart are listed here. These are District employees who have some responsibility with the development or implementation of the SSMP.

Board of Directors:

Establishes policies, reviews and accepts formal plans, sets overall District direction, authorizes funds for projects/plans/programs, general overview of management personnel, conducts public meetings and hearings, approves SSMP.

CHAPTER 2 – DESCRIPTION OF ORGANIZATION

CONTINUED

<u>District Counsel:</u>	Develops and approves legal documents, provides legal advice, conducts litigation, and attends public meetings.
<u>General Manager:</u>	Responsible for the management and operation of the District under the direction of the Board. Plans, organizes, directs, and controls the activities and operations of the District. Develops and oversees projects and programs, strategic planning issues, short and long term financial planning, allocation of resources, contracts administration, establishes policy, and serves as public information officer.
<u>Operations Manager:</u>	Directs and manages the day-to-day operations of the wastewater Collection System and Treatment Plant facilities of the District. Develops and monitors the programs, guidelines, organizational, and individual goals to ensure compliance with local, state, and federal rules and regulations. Review and evaluate facility operations and improvements to ensure optimal performance and consistent regulatory compliance. Reports to the General Manager.
<u>Construction Inspector:</u>	Performs plan reviews and inspections for new and rehabilitation construction activities to ensure compliance with District specifications and standards. Assists in the planning and preparation of construction projects, and coordinates construction activities and inspection with vendors, property owners, and regulatory agencies and personnel.
<u>Collection System Supervisor:</u>	Responsible for the field operation and maintenance activities of the collection system. Exercises technical and functional supervision over collection system staff, trains and evaluates personnel in safe operation and maintenance procedures. Prepares reports and maintains maintenance documentation. Prepares and implements contingency plans, leads emergency response, investigates and reports SSOs. Reports to the Operations Manager.
<u>CS Operators:</u>	Staff the preventive maintenance activities to include line cleaning and CCTV activities, lift stations operation and maintenance, mobilize and respond to notification of blockages and SSOs. An advanced operator performs more complex and difficult operations required to operate and maintain the collection system; monitors and assist operators in the completion of O&M tasks; provides on-the-job training and leads field activities associated with SSO emergency response.

Administration/Office Staff: Receive and relay telephone notifications of blockages and SSOs to collection system personnel.

2.2 Chain of Communication

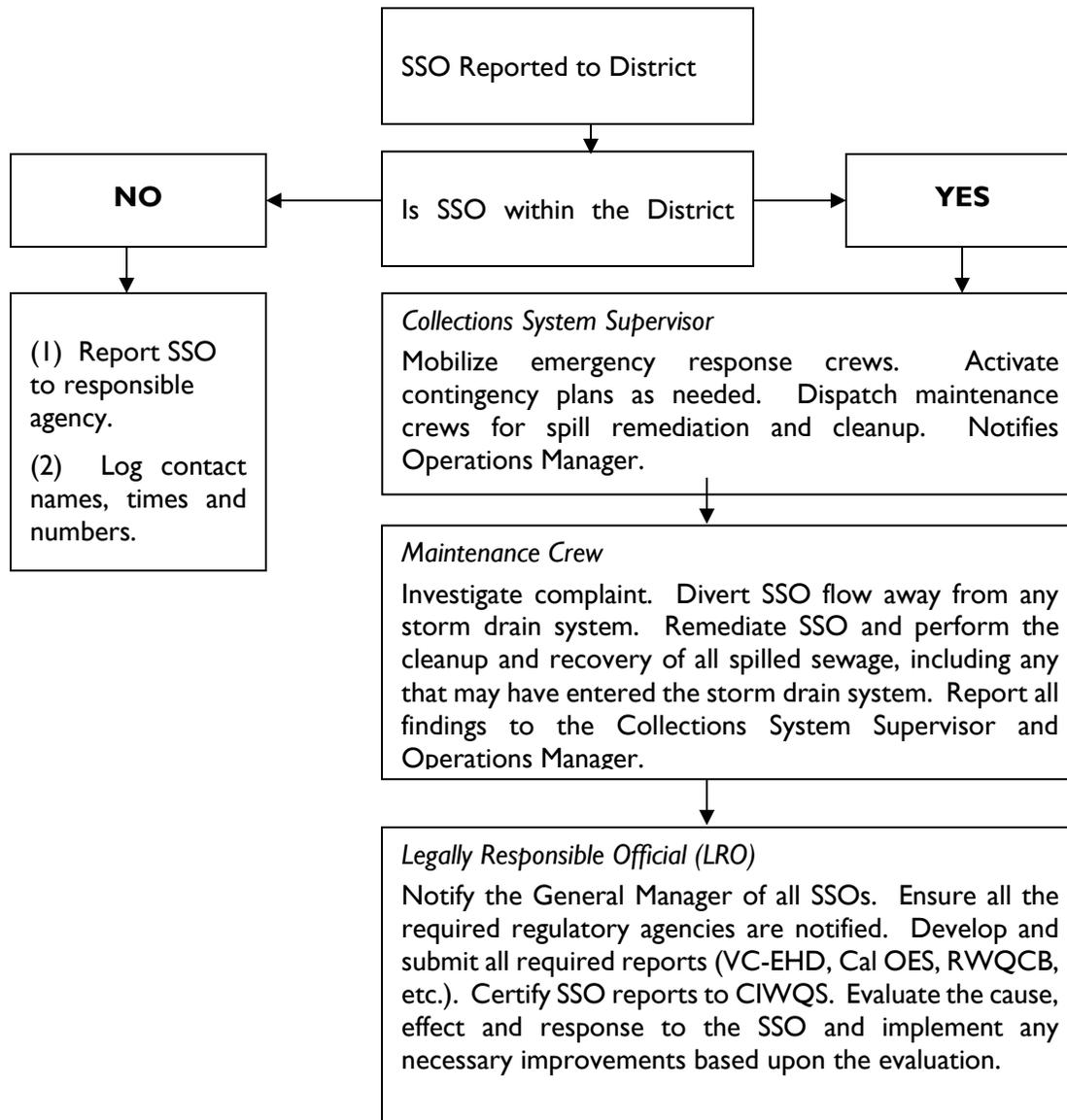
The Order requires the chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, Ventura County Environmental Health Agency, Regional Water Quality Control Board, and/or California Office of Emergency Services (Cal OES)).

2.2.1 Compliance Summary

During normal business hours, SSOs are reported to the District's Administrative Office. The District's Administrative Staff will notify the Collections Systems Supervisor who will determine if the SSO is within the District's jurisdiction and will dispatch a maintenance crew as appropriate. The maintenance crew is responsible for protecting the waters of the US by diverting flow away from any storm water facilities, remediate the SSO, and perform the cleanup and recovery of all spilled sewage including any that may have entered the storm drain system. The maintenance crew will report their findings and outcome to the Collection System Supervisor and the Operations Manager. The Operations Manager will report all SSOs to the District's General Manager. The Operations Manager documents the event, ensures the appropriate regulatory agencies are notified, and evaluates the cause, effect, and response to the SSO. The Operations Manager, in conjunction with the Collection Systems Supervisor will complete the necessary notification and reporting documentation including the online CIWQS reporting. The Operations Manager or the advanced Collections System Operator, are responsible representatives that are designated as the LRO, will certify all CIWQS reports, as required.

The following flow chart shows the chain of communication for reporting SSOs. It starts with the receipt of a complaint or other information and includes the title of the person responsible for reporting SSOs to CIWQS, SWRCB, Ventura County Environmental Health Department (VC-EHD), and California Office of Emergency Services (Cal OES). Reporting to Cal OES is required within two hours of becoming aware of any Category I SSO greater than or equal to 1,000 gallons of discharge to surface water or spilled in a location where it probably will be discharged to surface water. Reporting to CIWQS of private property spills is voluntary. This flowchart is part of the SSO Reporting Guidelines developed to manage the reporting process and is in the District's current SSO Spill Response Plan located at the District's Administrative Offices.

**Ojai Valley Sanitary District
SSO Procedures Flow Chart**



2.2.2 Compliance Documents

In September 2013 the SWRCB changed the reporting of SSOs from appearance based to event based. Under the event-based system one SSO report is required for each SSO that occurs regardless of the number of appearance points although each appearance point must be noted in the report. Previously, a separate SSO report had to be filed for each appearance point sometimes requiring numerous SSO reports for the same SSO event.

Reporting of all unauthorized discharges from the District's sanitary sewer collection systems is required by the Order. Discharges are rated by category. A Category I SSO is an SSO of any volume that reaches surface water, or a storm drain or channel that is tributary to surface water. A Category II SSO is any discharge of 1,000 gallons or greater that does not reach surface waters, a drainage channel or storm water system (MS4) and is not fully captured and properly disposed of. A Category III SSO is all other discharges from the District's collection systems. Private lateral discharges are sewage discharges that occur from private sewer lateral or other privately-owned sewer assets. The District is not responsible for private lateral discharges but may voluntarily report them as the District becomes aware of them. Updated SSO Reporting Flow Charts, staff titles, and staff contact information are maintained at the District's administrative office. Ventura County Environmental Health Department (VC-EHD) has requested to be notified of any discharge from the District's collection system or from any private lateral or other private sewer asset that the District becomes aware of. Failure to comply with the monitoring and reporting requirements of the State could result in civil liabilities of up to \$5,000 a day per violation pursuant to Water Code section 13350; up to \$1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement.

Notification Requirements. The District is required to notify Cal OES and obtain a notification control number within two hours of becoming aware of any Category I SSO greater than or equal to 1,000 gallons of discharge to surface water or spilled in a location where it probably will be discharged to surface water. Notification is to be immediate but not later than 2 hours after the District becomes, (A) aware of the SSO, (B) notification is possible, and (C) notification is possible without substantially impeding the cleanup or other emergency activities.

To satisfy the notification requirements for each applicable SSO the District must provide the information requested by Cal OES before receiving a control number. The requested spill information may include the following:

- a. Name of person notifying Cal OES and direct return phone number.
- b. Estimated SSO volume discharged (gallons).
- c. If ongoing, estimated SSO discharge rate (gallons per minute).
- d. SSO Incident Description:
 - i. Brief narrative.
 - ii. On-scene point of contact for additional information (name and cell phone number).
 - iii. Date and time enrollee became aware of the SSO.
 - iv. Name of sanitary sewer system agency causing the SSO.
 - v. SSO cause (if known).
- e. Indication of whether the SSO has been contained.

- f. Indication of whether surface water is impacted.
- g. Name of surface water impacted by the SSO, if applicable.
- h. Indication of whether a drinking water supply is or may be impacted by the SSO.
- i. Any other known SSO impacts.
- j. SSO incident location (address, city, state, and zip code).

After the initial notification to Cal OES and until the District has certified the SSO report in the CIWQS Online Database, the District is required to provide updates to Cal OES regarding substantial changes to the SSO's estimated volume or known impacts.

Reporting Requirements. All unauthorized SSOs occurring within the District's sanitary sewer collection system must be reported to the CIWQS Online SSO Database. SSOs from the District's collection system are classified as Category 1, Category 2 or Category 3 depending upon their size and whether they spilled to surface waters. A Category 1 SSO is any unauthorized volume discharge that reaches surface water or a drainage channel that is tributary to surface water or an MS4 and is not fully captured and disposed of properly. Any volume of wastewater not recovered from an MS4 is considered to have reached surface waters unless the storm drain system discharges to a dedicated storm water or ground water infiltration basin. A Category 2 SSO is any unauthorized wastewater discharge equal to or greater than 1,000 gallons and does not reach surface waters, a drainage channel, or MS4 unless the entire volume of the SSO is recovered and disposed of properly. A Category 3 SSO is any other unauthorized discharge of wastewater resulting from a failure or flow condition in the District's sanitary sewer collection system.

Category 1 and Category 2 SSOs must have a draft report submitted to the CIWQS Online Database within 3 business days of the District becoming aware of the SSO. A final SSO report must be certified within 15 calendar days to the CIWQS Online Database. A Category 3 SSO must be reported to CIWQS and be certified within 30 calendar days after the month that the SSO occurred.

At a minimum, the following mandatory information shall be reported for a *draft* **Category 1 SSO Report**:

- a. SSO Contact Information: Name and telephone number of enrollee contact person who can answer specific questions about the SSO being reported.
- b. SSO Location Name.
- c. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field.
- d. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure.
- e. Whether or not the SSO reached a municipal separate storm drain system.
- f. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.

- g. Estimate of the SSO volume, inclusive of all discharge point(s).
- h. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain.
- i. Estimate of the SSO volume recovered (if applicable).
- j. Number of SSO appearance point(s).
- k. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
- l. SSO start date and time.
- m. Date and time the enrollee was notified of, or self-discovered, the SSO.
- n. Estimated operator arrival time.
- o. For spills greater than or equal to 1,000 gallons, the date and time Cal OES was called.
- p. For spills greater than or equal to 1,000 gallons, the Cal OES control number.

At a minimum, the following mandatory information shall be reported for a *certified* **Category I SSO Report**, in addition to all fields required in the draft Category I SSO Report:

- a. Description of SSO destination(s).
- b. SSO end date and time.
- c. SSO causes (mainline blockage, roots, etc.).
- d. SSO failure point (main, lateral, etc.).
- e. Whether or not the spill was associated with a storm event.
- f. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the overflow; and a schedule of major milestones for those steps.
- g. Description of spill response activities.
- h. Spill response completion date.
- i. Whether or not there is an ongoing investigation, the reasons for the investigation and the expected date of completion.
- j. Whether or not a beach closure occurred or may have occurred as a result of the SSO.
- k. Whether or not health warnings were posted as a result of the SSO.
- l. Name of beach(es) closed and/or impacted. If no beach was impacted, NA shall be selected.
- m. Name of surface water(s) impacted.
- n. If water quality samples were collected, identify parameters the water quality samples were analyzed for. If no samples were taken, NA shall be selected.

- o. If water quality samples were taken, identify which regulatory agencies received sample results (if applicable). If no samples were taken, NA shall be selected.
- p. Description of methodology(ies) and type of data relied upon for estimations of the SSO volume discharged and recovered.
- q. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Database will issue a final SSO identification (ID) number.

At a minimum, the following mandatory information shall be reported for a *draft* **Category 2 SSO Report**:

- a. SSO Contact Information: Name and telephone number of enrollee contact person who can answer specific questions about the SSO being reported.
- b. SSO Location Name.
- c. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field.
- d. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure.
- e. Whether or not the SSO reached a municipal separate storm drain system.
- f. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.
- g. Estimate of the SSO volume, inclusive of all discharge point(s).
- h. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain.
- i. Estimate of the SSO volume recovered (if applicable).
- j. Number of SSO appearance point(s).
- k. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
- l. SSO start date and time.
- m. Date and time the enrollee was notified of, or self-discovered, the SSO.
- n. Estimated operator arrival time.

At a minimum, the following mandatory information shall be reported for a *certified* **Category 2 SSO Report**, in addition to all fields required in the draft Category 2 SSO Report:

- a. SSO Contact Information: Name and telephone number of enrollee contact person who can answer specific questions about the SSO being reported.
- b. SSO Location Name.

- c. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field.
- d. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure.
- e. Whether or not the SSO reached a municipal separate storm drain system.
- f. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.
- g. Estimate of the SSO volume, inclusive of all discharge point(s).
- h. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain.
- i. Estimate of the SSO volume recovered (if applicable).
- j. Number of SSO appearance point(s).
- k. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
- l. SSO start date and time.
- m. Date and time the enrollee was notified of, or self-discovered, the SSO.
- n. Estimated operator arrival time.
- o. Description of SSO destination(s).
- p. SSO end date and time.
- q. SSO causes (mainline blockage, roots, etc.).
- r. SSO failure point (main, lateral, etc.).
- s. Whether or not the spill was associated with a storm event.
- t. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the overflow; and a schedule of major milestones for those steps.
- u. Description of spill response activities.
- v. Spill response completion date.
- w. Whether or not there is an ongoing investigation, the reasons for the investigation and the expected date of completion
- x. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Database will issue a final SSO identification (ID) number.

At a minimum, the following mandatory information shall be reported for a *certified* **Category 3 SSO Report**, in addition to all fields required in the draft Category 2 SSO Report:

- a. SSO Contact Information: Name and telephone number of enrollee contact person who can answer specific questions about the SSO being reported.
- b. SSO Location Name.
- c. Location of the overflow event (SSO) by entering GPS coordinates. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the SSO appearance point explanation field.
- d. Whether or not the SSO reached surface water, a drainage channel, or entered and was discharged from a drainage structure.
- e. Whether or not the SSO reached a municipal separate storm drain system.
- f. Whether or not the total SSO volume that reached a municipal separate storm drain system was fully recovered.
- g. Estimate of the SSO volume, inclusive of all discharge point(s).
- h. Estimate of the SSO volume that reached surface water, a drainage channel, or was not recovered from a storm drain.
- i. Estimate of the SSO volume recovered (if applicable).
- j. Number of SSO appearance point(s).
- k. Description and location of SSO appearance point(s). If a single sanitary sewer system failure results in multiple SSO appearance points, each appearance point must be described.
- l. SSO start date and time.
- m. Date and time the enrollee was notified of, or self-discovered, the SSO.
- n. Estimated operator arrival time.
- o. Description of SSO destination(s).
- p. SSO end date and time.
- q. SSO causes (mainline blockage, roots, etc.).
- r. SSO failure point (main, lateral, etc.).
- s. Whether or not the spill was associated with a storm event.
- t. SSO Certification: Upon SSO Certification, the CIWQS Online SSO Database will issue a final SSO identification (ID) number.

SSO Technical Report. The District must submit an SSO Technical Report to the CIWQS Online SSO Database within 45 calendar days of the end date for any SSO of 50,000 gallons or greater that was spilled to surface waters. The Technical Report shall include:

Causes and Circumstances of the SSO:

- a. Complete and detailed explanation of how and when the SSO was discovered.

- b. Diagram showing the SSO failure point, appearance point(s), and final destination(s).
- c. Detailed description of the methodology employed, and available data used to calculate the volume of the SSO and, if applicable, the SSO volume recovered.
- d. Detailed description of the cause(s) of the SSO.
- e. Copies of original field crew records used to document the SSO.
- f. Historical maintenance records for the failure location.

Enrollee's Response to SSO:

- a. Chronological narrative description of all actions taken by enrollee to terminate the spill.
- b. Explanation of how the SSMP Overflow Emergency Response Plan was implemented to respond to and mitigate the SSO.
- c. Final corrective action(s) completed and/or planned to be completed, including a schedule for action not yet completed.

Water Quality Monitoring:

- a. Description of all water quality sampling activities conducted including analytical results and evaluation of the results.
- b. Detailed location map illustrating all water quality sampling points.

Water Quality Monitoring Requirements. To comply with subsection D.7(v) of the SSS WDRs, the District shall develop and implement an SSO Water Quality Monitoring Program to assess impacts from SSOs to surface waters in which 50,000 gallons or greater are spilled to surface waters. The SSO Water Quality Monitoring Program, shall, at a minimum:

- a. Contain protocols for water quality monitoring.
- b. Account for spill travel time in the surface water and scenarios where monitoring may not be possible (e.g. safety, access restrictions, etc.).
- c. Require water quality analyses for ammonia and bacterial indicators to be performed by an accredited or certified laboratory.
- d. Require monitoring instruments and devices used to implement the SSO Water Quality Monitoring Program to be properly maintained and calibrated, including any records to document maintenance and calibration, as necessary, to ensure their continued accuracy.
- e. Within 48 hours of the District becoming aware of the SSO, require water quality sampling for, at a minimum, the following constituents:
 - i. Ammonia
 - ii. Appropriate Bacterial indicator(s) per the applicable Basin Plan water quality objective or Regional Board direction which may include total and fecal coliform, enterococcus, and e-coli.

Within 48 hours of an SSO that enters a surface water body experienced District personnel shall take water samples, using the District's established protocols for surface water sampling, at or downstream from where the SSO entered the water body. Samples shall be taken to the

District's lab to be analyzed. The District shall maintain the water sampling results as part of the records keeping for the SSO.

No spill certification. If no spills occurred during a calendar month the District must 1) certify, within 30 calendar days after the end of the month that no spills occurred that there were no spills during that designated month or 2) certify quarterly, within 30 calendar days of the end of the quarter, that there were no spills during that quarter. Quarters are Q1-January/February/March, Q2-April/May/June, Q3-July/August/September, Q4-October/November/December. If the District reports a private property sewage discharge during a month (or quarter) that no spills occurred from the District's system, the District is still required to file a no spill certification.

Amended SSO Reports. The District may update or add additional information to a certified SSO report within 120 calendar days after the SSO end date by amending the report or adding an attachment to the SSO report in the CIWQS Online SSO Database.

Updated SSO Reporting Flow Charts, staff titles, and staff contact information are maintained at the District administrative office. VC-EHD has requested to be notified of any discharge from the District's collection system or from any private lateral or other private sewer asset that the District become aware of.

CIWQS Online Database Unavailability. Should the CIWQS Online Database be unavailable, the District is to fax or e-mail the required spill information to the Region 4 Water Quality Control Board. The District must also enter all required spill information into the CIWQS Online Database once it becomes available.

Collection System Questionnaire. Every twelve months the District must complete and certify their Collection System Questionnaire.

Record Keeping. The District is to maintain records for a minimum of five (5) years and shall make them available for review by the Water Boards during an onsite inspection or an information request.

- a. General records shall document the District's compliance with the provisions of the SSS WDRs and any MRPs.
- b. SSO records shall be maintained for each SSO event and shall at a minimum include:
 - i. Complaint records documenting how the District responded to all notifications of possible or actual SSOs, both during and after business hours, including complaints that do not result in SSOs. Each complaint record shall, at a minimum, include the following:
 - ii. Date, time, and method of notification.
 - iii. Date and time the complainant or informant first noticed the SSO.
 - iv. Narrative description of the complaint, including any information the caller can provide regarding whether or not the complainant or informant

- reporting the potential SSO knows if the SSO has reached surface waters, drainage channels or storm drains.
- v. Follow-up return contact information for complainant or informant for each complaint received, if not reported anonymously.
 - vi. Final resolution of the complaint.
- c. Records documenting steps and/or remedial actions undertaken by enrollee, using all available information, to comply with section D.7 of the SSS WDRs.
 - d. Records documenting how all estimate(s) of volume(s) discharged and, if applicable, volume(s) recovered were calculated.
 - e. Records documenting all changes made to the SSMP since its last certification indicating when a subsection(s) of the SSMP was changed and/or updated and who authorized the change or update. These records shall be attached to the SSMP.
 - f. Electronic monitoring records relied upon for documenting SSO events and/or estimating the SSO volume discharged, including, but not limited to records from:
 - i. Supervisory Control and Data Acquisition (SCADA) systems
 - ii. Alarm system(s)
 - iii. Flow monitoring device(s) or other instrument(s) used to estimate wastewater levels, flow rates and/or volumes.

CHAPTER 2 – DESCRIPTION OF ORGANIZATION

CONTINUED

The following table summarizes the required reporting and reporting time frames the District utilizes to comply with the Order.

Type of Spill	Agency(s) to notify	Notification Timeframe	Report Timeframe
<p>Category 1 – any volume discharge of sewage resulting from a failure or flow condition in the District’s sanitary sewer collection system that:</p> <p>A. Reach surface waters and/or reach a drainage channel tributary to a surface water; or</p> <p>B. Reach a Municipal Separate Storm Sewer System (MS4) and are not fully captured and disposed of properly. (Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g. infiltration pit, percolation pond).)</p>	<p>Cal OES RWQCB per staff request. VC-EHD per staff request.</p>	<p>Within 2 hours of District staff becoming aware of any Category 1 SSO greater than or equal to 1,000 gallons, notify the Cal OES and obtain a notification control number.</p>	<p>Submit draft report on CIWQS within 3 business days of becoming aware of the SSO.</p> <p>Certify within 15 calendar days of the SSO end date.</p> <p>SSO Technical Report: Submit within 45 calendar days after the end date of any Category 1 SSO in which 50,000 gallons or greater is spilled to surface waters.</p>
<p>Category 2 – Discharges of untreated or partially treated wastewater of 1,000 gallons or greater that do not reach surface water, a drainage channel, or MS4 unless the entire SSO discharged to the storm drain system is fully recovered and disposed of properly.</p>	<p>RWQCB per staff request. VC-EHD Any discharge regardless of size.</p>	<p>Immediate</p>	<p>Submit draft report on CIWQS within 3 business days of becoming aware of the SSO.</p> <p>Certify within 15 calendar days of the SSO end date.</p>
<p>Category 3 – All other discharges of untreated or partially treated wastewater resulting from a flow condition or failure in the sanitary collection system.</p>	<p>RWQCB per staff request. VC-EHD Any discharge regardless of size.</p>	<p>Immediate</p>	<p>Must report and certify on CIWQS within 30 days after the end of the calendar month in which the SSO occurred.</p>
<p>Private lateral sewage discharges (PLSD) that are caused by blockages or other problems within a privately owned lateral or other private sewer assets.</p>	<p>RWQCB per staff request. VC-EHD Any discharge regardless of size if sewage leaves the property.</p>	<p>Immediate as the District becomes aware.</p>	<p>Private lateral sewage discharges may be voluntarily reported to the Online SSO Database based upon Order NO. WQ 2013-0058-EXEC. If PLSD is reported the Enrollee must identify the sewage discharge as occurring and caused by a private lateral, and a responsible party should be identified, if known.</p>
<p>No Spill Report</p>	<p>CIWQS</p>		<p>“No Spill” Certification: Certify that no SSOs occurred within 30 calendar days of the end of the month.</p>

The following table lists the contact information for the various agencies requiring notification of an SSO.

Normal Hours	After Hours
VC-EHD (1) Regular hours: 1-(805)-654-2813 – (If you get the message center, Press 0, or hold for live person) (2) Send a Fax of the Proposition 65 Report to 1-(805)-654-2480 (3) After hours: Call (805) 320-6244	VC-EHD’s On-call person, or Call 911 – Request VC-EHD’s Sewage Discharge Response
RWQCB – Los Angeles Region 213-576-6657 or Fax 213-620-6140 After hours – 213-305-2284 or 213-305-2253	24 hours
Cal OES (California Office of Emergency Services) (800) 852-7550	24 hours
City of Ventura, Avenue Water Treatment Plant 1-(805)-652-4548 7 days/week 7am-3:30pm 1-(805)-652-4500 Mon-Friday 8am-5pm	After hours: 1-(805)-339-4399 Police & Fire Dispatch
California Highway Patrol 911	24 hours

2.2.3 Roles and Responsibilities

The roles and responsibilities of each chain (position) in the line of communications are described below:

Administrative Staff: Receive and relay telephone notifications of blockages and SSOs to collection system supervisor, construction inspector, or directly to collection system personnel.

Collection System Supervisor: Receives the notification and contacts collection system personnel to respond and investigate complaint. Prepares and implements contingency plans, leads emergency response, investigates and reports SSOs. Reports crew findings to Operations Superintendent. Contacts CIWQS and local VC-EHD for SSO’s. Backup to Operations Superintendent for regulatory notifications.

Maintenance Crew: Crew responds to and investigates complaint. Reports findings to Supervisor. Mobilize appropriate equipment and personnel for stoppages and SSOs.

Legally Responsible Official: Notifies General Manager of all SSO’s. SSO’s that reach a waterway or are greater than 1,000 gallons trigger notification to Cal OES, RWQCB. Certifies CIWQS SSO’s, and provides detailed reports to RWQCB for all SSO’s that reach waterways.

LEGAL AUTHORITY

This chapter describes the legal authority required to implement the SSMP plans and procedures.

The SSMP must include the legal authority, through sewer use ordinances, service agreements, or other legally binding procedures, to:

- a. Prevent illicit discharges into its sanitary sewer system (examples may include I&I, stormwater, chemical dumping, unauthorized debris and cut roots, etc.);
- b. Require that sewers and connections be properly designed and constructed;
- c. Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
- d. Limit the discharge of fats, oils, and grease and other debris that may cause blockages; and
- e. Enforce any violation of its sewer ordinances.

3.1 Compliance Summary

Ordinance No. 64, adopted by the Ojai Valley Sanitary District's Board of Directors on April 25, 2011, established the Ojai Valley Sanitary District's Code of Regulations which superseded District Ordinance Nos. 1, 2 and 3. Ordinance No. 64, District Code of Regulations, fulfills the legal requirements of the Order.

In general and specific terms, Ordinance 64 addresses items (a), (b), (c) (d) and (e).

District Code of Regulations requires that all dischargers to the public sewer system comply with the District's provisions, regulations and terms. Chapter 5 requires connection to the public system where the public system is available. Chapter 5 also establishes the specific use of the public sewer including what types of discharges are prohibited. Chapter 9 establishes the legal authority for the District to enforce its Ordinance's rules and regulations.

Chapter 3 of the Code of Regulations establishes the legal authority for the District to create rates and fees necessary to fund the operation and maintenance requirements, including capital improvement programs, necessary for compliance with the WDR.

Chapter 8 of the Code of Regulations establishes the District's design and construction standards for the construction of its wastewater mains and other appurtenances. Ordinance 64 also adopted, and incorporated into the Code of Regulations, the County of Ventura Public Works Agency Sewerage Manual; Ventura County Waterworks District No. 1, 16, 17 & 19 Rules and Regulations, Part 10, Section H – Design of Sewer Systems; Standard Plans for Public Works Construction; and Standard Specifications for Public Works Construction. Chapter 4 of the Code of Regulations provides for the construction, operation and maintenance of laterals and lateral connections.

Chapter 11 of the Code of Regulations establishes the District's fats, oils and grease (FOG) program. The FOG Program, discussed in detail in Chapter 7 of the District's SSMP, regulates

the discharge of FOG into the District's wastewater collection system. Chapter 11 of the Code of Regulations specifically addresses what can and cannot be discharged into the District's wastewater collection system and establishes penalties for violations.

3.2 Compliance Documents

The legal authority for enacting the SSMP programs and policies are included in the following ordinances. These, and other ordinances adopted to amend existing ordinances, may be reviewed at the District's Administrative Offices located at 1072 Tico Road, Ojai, California 93023.

- a. Ordinance 64 District Code of Regulations - located at the District Administrative Office.
- b. Ordinance 49 – Pretreatment (Fats, Oils and Grease Program) - located at the District Administrative Office.

OPERATIONS AND MAINTENANCE

The Enrollee shall properly, manage, operate, and maintain all parts of the sanitary sewer system owned or operated by the Enrollee, and shall ensure that the system operators (including employees, contractors, or other agents) are adequately trained and possess adequate knowledge, skills, and abilities.

The SSMP must include those elements listed below that are appropriate and applicable to the Enrollee's system:

- a. Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities;
- b. Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders;
- c. Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan;
- d. Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
- e. Provide equipment and replacement part inventories, including identification of critical replacement parts.

4.1 Mapping

The requirement for this section is to maintain an up-to-date map of the collection system showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and stormwater conveyance facilities.

4.1.1 Compliance Summary

The District maintains a Geographical Information System (GIS) that provides up-to-date mapping of all of the District's facilities. This system currently contains multiple layers including parcel maps, Atlas of the entire collection system, as-built drawings, root control areas, roach control

areas, and manhole lid liner locations. The District's Computer Maintenance Management System Program (CMMS) program is linked to the GIS to assist with the operation and maintenance of the system. As-built and Atlas grid maps are available in hard copy or via-computers that provide maintenance crews with the most up to date maps.

Maintenance of the system is performed primarily in-house and is ongoing with new map layers being developed as needed. As-built's for new facilities are added to the system as they come online, as are the atlas updates, both of which are currently outsourced.

Much of the storm water conveyance system in the area is open trench or curb and gutter, although some of the newer developed areas utilize catch basins and storm water piping. The storm water conveyance system is owned and maintained by either the City of Ojai or the County of Ventura. The District works closely with both the City and County for mapping and assistance should a spill enter the storm water system.

4.1.2 Compliance Documents

The documents supporting compliance with the requirements for mapping are as follows:

- a. GIS – located at the District's Administrative Office.
- b. Hard copy maps produced from the GIS.
- c. Storm water maps provided by City and County.

4.2 Preventive Maintenance Program

The Order requires the District to describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventive Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders.

4.2.1 Compliance Summary

The District utilizes a comprehensive needs-based maintenance program for its sanitary collection system that includes the cleaning of its 12-inch and smaller lines every 2 years and 15-inch and larger trunk lines every 6 years. The District's maintenance program includes preventive, predictive and corrective maintenance procedures for all of the District's facilities including pipelines, lift stations, siphons, etc. The District has both a Root Control Program and a FOG Control Program. The FOG Control Program is operated in conjunction with the City of Ojai and the County of Ventura for the unincorporated areas of the District. Infiltration and Inflow (I&I) are being reduced through an active I&I Reduction Program.

The District uses the CMMS to schedule and track the maintenance activities for its sanitary collection system. This system assists the District by tracking or producing work orders, assets, preventive maintenance schedules, inspections, inventories, parts, customer service, addresses, projects and reports.

The District owns its own CCTV equipment and performs CCTV inspections of its pipelines using digital video capture and storage. This video provides baseline information which is being updated as they continue their annual CCTV program. CCTV inspection records and a modified version of the NASSCO's Pipeline Assessment and Certification Program (PACP) are utilized to evaluate, categorize and prioritize pipeline deficiencies.

4.2.2 Compliance Documents

Documents which support compliance of this section include the following:

- a. OVSD Sanitary Collections System Operations and Maintenance Program – located at the District Administrative Office.
- b. Computer Maintenance Management System (CMMS) – located at the District Administrative Office.
- c. CCTV inspection records – located at the District Administrative Office.

4.3 Rehabilitation and Replacement Plan

Every Enrollee is responsible to develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and CCTV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. The rehabilitation and replacement plan should include a capital improvement plan (CIP) that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan.

4.3.1 Compliance Summary

In 2007 the District completed a comprehensive collection system capital improvement plan (CIP). While the District has been proactive in maintaining its collection system and maintaining reliable performance, it must consider the long-term costs of rehabilitating and replacing these assets as they age or become technically obsolete. All assets eventually reach the end of their useful life where:

- a. condition and risk of failure is unacceptable,
- b. can no longer provide required capacity or performance,
- c. become technically obsolete, or
- d. become financially inefficient to operate and maintain.

The goal of this CIP is to provide reasonable estimates and predictions of the timing and cost of future capital investments based on the best information currently available. Using this information, the District can ensure that financial and funding plans are in place to meet expected future collection system capital needs.

The District currently utilizes a modified CIP program that includes an in-depth assessment of all of the District collection system assets including all gravity pipelines, force mains and lift stations. Replacement and rehabilitation are prioritized based on current condition with assets in the poorest condition being scheduled for the earliest rehabilitation or replacement. To provide funding for current and future rehabilitation or replacement projects the District has established and funds short and long term dedicated reserves.

The District continues its CCTV inspection and assessment program for its gravity pipelines. Each year as new inspection videos are produced, they are evaluated and compared to the baseline inspection videos to ensure the serviceability of the collection system.

4.3.2 Compliance Documents

The documents supporting compliance with the rehabilitation and replacement plan requirements are as follows:

- a. CCTV Inspection Program Videos – located at the District’s Administrative Office.
- b. CCTV records and PACP condition assessments – located at the District’s Administrative Office.
- c. Collection System Capital Improvement Plan (CIP) – located at the District’s Administrative Office.
- d. Current Year Budget – located at the District’s Administrative Office.

4.4 Training Program

The District is required to and does provide training on a regular basis for staff in sanitary sewer system operations and maintenance.

4.4.1 Compliance Summary

The District has an ongoing job skills training program including participation in outside training programs and seminars. The District trains its employees in all aspects of the collection system’s operation and maintenance, including line cleaning and CCTV operations and lift station maintenance procedures. Training is conducted in spill response and remediation. The District fully endorses CWEA Certification for its employees and utilizes CWEA certification as a basis for promotion within the District. In addition to job skills training, the District has an active safety training program. Safety training is provided in-house and through outside programs and seminars.

Should the services of an outside contractor be required, the District only does business with a pre-approved list of outside contractors. The District verifies any contractor is licensed and bonded prior to being awarded a contract. This policy ensures the contractor is qualified as being capable of performing to District standards.

4.4.2 Compliance Documents

The following documents demonstrate the type of training provided to staff:

- a. Training Records – located at the District’s Administrative Office

4.5 Equipment and Parts Inventories

Each Enrollee is required to provide equipment and replacement part inventories, including identification of critical replacement parts for the operation and maintenance of its sewer collection system.

4.5.1 Compliance Summary

The District’s CMMS contains a complete inventory of the District’s collection system assets. The maintenance program provides an inventory of parts needed to support the District’s maintenance activities.

4.5.2 Compliance Documents

The documents supporting compliance with the requirement to maintain an inventory of equipment and parts including identification of critical parts are as follows:

- a. Inventory Records – located at the District’s Administrative Office.

DESIGN AND PERFORMANCE PROVISIONS

This chapter references the design and construction standards & specifications for new sewer systems, pump stations, and other appurtenances, and for the rehabilitation and repair of existing sewer systems. Also included are the procedures and standards for the inspection and testing of these facilities. The Order requires the following:

- a. Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and
- b. Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

5.1 Compliance Summary

To ensure consistency in the design and construction of collection system facilities within the Ojai Valley Sanitary District, the District has developed and adopted Ordinance 64. Referred to as the Wastewater Design and Construction Standards, this ordinance is used in conjunction with the latest edition of the Standard Specification for Public Works Construction (Greenbook), as prepared and published by Public Works Standards, Inc. Ordinance 64 provides the specifications to be used to establish standards of work, material and construction procedures for improvements to the District's sanitary collection system. The District also utilizes the most current Uniform Plumbing Code. All construction and repair or rehabilitation projects must be completed in accordance to Ordinance 64 prior to dedication or acceptance by the District. Detailed instructions and methodologies for the testing and inspection of construction, repair, and rehabilitation projects are provided in Ordinance 64. Testing and inspection of new or rehabilitated construction projects is performed by the District's Construction Inspector. The Construction Inspector's duties include performing plan reviews and inspections for construction activities to ensure compliance with District specifications and standards.

All design work for the District must be conducted by a professional California registered engineer and all contractors must be licensed and insured.

5.2 Compliance Documents

The documents used for design and performance evaluations include the following:

- a. Ordinance 64 - located at the District's Administrative Office.
- b. Standard Specification for Public Works Construction (Greenbook) – located at the District's Administrative Office.
- c. Uniform Plumbing Code with amendments - located at the District's Administrative Office.

OVERFLOW EMERGENCY RESPONSE PLAN

Under the Order, each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

- a. Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- b. A program to ensure an appropriate response to all overflows;
- c. Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification;
- d. Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- e. Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- f. A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

6.1 Compliance Summary

The District has a responsibility to respond to and mitigate sewage overflows that occur within their sanitary sewer collection system and to report their occurrence. To assist in this effort and to ensure compliance with the WDR the District has developed a Sanitary Sewer Overflow and Backup Response Plan. This plan is regularly reviewed and updated as necessary.

The District's Sanitary Sewer Overflow and Backup Response Plan stresses spill containment to reduce the impact on the environment while protecting the public and employee health. Depending upon the location and type of SSO District employees will employ the use of sandbags, earthen berms, or other devices to contain the spill and protect surface waters or the storm water system. Employees are required to wear personal protective equipment, cordon off the spill area, and provide traffic control as needed. As requested by VC-EHD any spill occurring on hardscape is disinfected with a hospital grade disinfectant taking care not to allow any of the disinfectant to enter the storm water system. The District's Sanitary Sewer Overflow and Backup Response Plan provides detailed information to assist employees in responding to blockages, line failures, and SSOs within a structure. The plan gives details on SSO reporting and notification including appropriate contact information. As part of the District's NPDES permit, the District is required to provide sampling for any SSO that enters a stream or waterway with flowing water. Detailed instructions for both sampling and posting are included in the District's plan.

The District operates five (5) lift stations all equipped with radio-based telemetry to provide notification of abnormalities in real time. Four (4) of these pump stations are equipped or have available standby generators to provide power in case of commercial power failures. The District also requires sewage backflow prevention devices for commercial and residential properties located at a lower elevation than the closest up stream manhole.

In addition to the District's Sanitary Sewer Overflow and Backup Response Plan, the District has developed a Disaster Operations Plan (DOP). The DOP provides District employees with information and instruction in the event of a local disaster that impacts the treatment plant, lift stations, metering sites, and other District facilities.

The District endorses the voluntary CWEA certification program and encourages its employees to seek and maintain collection systems operator certification. The District also conducts in-house training of its employees for safety, operations and spill response.

6.2 Compliance Documents

The compliance documents that detail the Enrollee's Overflow Emergency Response Plan are as follows:

- a. Sewage Spill Prevention and Response Plan – located at the District's Administrative Offices and the District's treatment plant
- b. Disaster Operations Plan – located at the District's Administrative Offices and the District's treatment plant.
- c. Training Records - located at the District's Administrative Offices.

FATS, OILS, AND GREASE CONTROL PROGRAM

Under the Order, each Enrollee is required to evaluate its service area to determine whether a FOG control program is needed. If the Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- a. An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- b. A plan and schedule for the disposal of FOG 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 FOG generated within a sanitary sewer system service area;
- c. The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- d. Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- e. Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;
- f. An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- g. Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

7.1 Compliance Summary

The District's Pretreatment Program Procedures includes an Oil and Grease Control Program which is the District's FOG Control Program. Food service establishments (FSEs) who discharge or have the potential to discharge FOG into the District's sanitary collection system are required to obtain an Oil and Grease Control Program Permit from the District. On a case-by-case basis, new or remodeled FSEs may be required install a grease removal device. Grease removal devices are typically gravity grease interceptors, or may be hydro-mechanical grease interceptors, and must be sized according to the most current version of the Uniform Plumbing Code (UPC) and concurrent with the Plumbing and Drain Institute (PDI) Standard PDI-101. All grease removal devices must be properly installed and maintained and not allowed to accumulate solids greater than 25% of the device's fluid capacity. Kitchen best management practices (BMPs) are prescribed as part of the FOG source control. BMPs are listed on each issued Oil and Grease Control Program Permit and are available as a separate handout. Permits are renewed every 5 years and are incentive based. Those FSEs who fail to reduce their FOG discharge may be required to install additional grease removal devices and reimburse the District for all costs incurred correcting the problem.

The District conducts inspections of FOG producing facilities. FOG inspections are normally scheduled annually but can be more frequent if problems or compliance issues arise. FSEs are required to maintain accurate records of their FOG reduction practices as well as the maintenance of their grease removal devices. The District strives to work closely with the City and County for building permits for new or remodeled construction. This interaction is critical for the efficient operation of the FOG reduction program as the District may not be aware of new or remodeled construction occurring. Both can trigger the need for an Oil and Grease Control Program Permit issued by the District.

The District maintains an ongoing list of grease prone areas for additional cleaning and performs CCTV inspections of upstream laterals to determine the source of FOG contributions. The District will also photograph laterals that show evidence of excessive FOG discharge and notify the property owner of the violation.

The District's Pretreatment Program Enforcement Procedures provides the structure for enforcing its FOG reduction program. Spill reports along with FSE on-site inspections are utilized to monitor the progress of the District's FOG Reduction Program. Enforcement can range from a warning letter to the discontinuance of service and/or civil or criminal action.

As part of the District's community outreach program, the District utilizes its newsletter, the *Pipeline*, to disseminate information and tips for District residents to help keep the District's collection system pipelines FOG-free. Pamphlets and other handouts from the Water Environment Federation and other sources are made available at the District office and are available at the several community events the District participates in.

7.2 Compliance Documents

The FOG control program activities are documented under the following ordinances, reports, and studies:

- a. OVSD District Code Regulations (Ordinance No. OVSD-64 – located at the District's Administrative Office.
- b. Pipeline Newsletter – available at the District's Administrative Office.

SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

The Order requires that each Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

- a. **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
- b. **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in Chapter 5 above to establish appropriate design criteria;
- c. **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I&I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding; and
- d. **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a-c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section 10 – Monitoring, Measurement and Program Modifications.

8.1 Compliance Summary

Evaluation: Historically, the District has had a few areas where capacity has become an issue during extremely heavy rainfall events (Inflow). The District has also had some issues with groundwater infiltration during times when the water table was high. Due to the geography that the District serves there have been some issues with pipelines potentially being washed or flooded out during heavy rainfall events. To ensure the integrity of the collection system, the District has invoked several aggressive maintenance practices that includes an Inflow and Infiltration (I&I) reduction program. The I&I program is designed to identify and eliminate sources of I&I within the District's sanitary collection system through the selective use of smoke testing, flow monitoring, and CCTV. Those areas suspected of providing potential I&I will be subject to additional evaluation, such as smoke testing, to determine the extent of their I&I potential. Areas of the District's collection system requiring an engineering solution to I&I will be added to the District's modified CIP program list.

The District owns its CCTV equipment with CCTV inspections being an ongoing part of the District's preventative maintenance program. The CCTV inspection program and the I&I Reduction Program are documented in the District's Sanitary Collections System Operations and Maintenance Program manual.

The District continuously updates its modified Capital Improvement Plan (CIP). To assist with the 2007 CIP and to evaluate the condition of the system the District hired an outside consultant to perform a complete third-party review of all of the District's collection system facilities. The modified CIP provides the District with projected 25-year capital expenditures for the collection system. The previous CIP, maintenance and repair records, CCTV inspection videos, spill reports, age, staff interviews, and field site visits were all used to provide data on the current condition of the collection system. Based on the collected data, facilities were graded on both their physical condition and process condition. Asset values were assigned, and rehabilitation or replacement targets were established based upon projected life cycles. Rehabilitation or replacement budgetary costs are currently reviewed annually.

In addition to the CIP that was prepared for the District, the District has contracted with an outside consultant to provide a hydraulic analysis of the District's collection system. This analysis will model the collection system and predict areas of capacity deficiencies. The analysis was completed in 2014. Data from the analysis was reviewed by District staff and the consultant with areas of deficiency being added to the CIP as appropriate. At the conclusion of the analysis, the District successfully completed a physical and hydraulic evaluation of the entire sanitary collection system including a plan for the rehabilitation or replacement of critical facilities.

Design Criteria: The District utilizes industry standards as the design criteria for its collection system. The Uniform Plumbing Code and the Standard Specification for Public Works Construction (Greenbook) are supplemented by the District's Ordinance 64 that provides the specifications to be used to establish standards of work, material and construction procedures for improvements to the District's sanitary collection system. The system is designed to handle projected dry and wet weather peak flows. As requirements and standards change, these changes are incorporated into the District's design standard. All design work for the District must be conducted by a professional California registered engineer and all contractors must be licensed and insured.

Capacity Enhancement Measures: The District has incorporated several capacity enhancement measures into its collection system. All of the District's lift stations are built with fully redundant pumping capacity. Standby pumps are not needed for peak shaving but can handle the lift station's full pumping capacity. By practice, the District has relocated several at-risk pipelines that were prone to flooding or washout. The remaining at-risk pipelines are closely monitored or scheduled for relocation. The District is considering creating additional retention basins for emergency storage during heavy rainfall events. The primary site would be at the District's treatment plant and would prevent backups into the collection system due to extremely heavy flows. The District has an aggressive I&I program to reduce stormwater or groundwater from entering the system. Since the District began an I&I reduction program in 2015, the I&I flows have dropped significantly in comparison to historical wet weather events. The District's CCTV inspection program and proactive line cleaning program help to ensure the collection system can handle designed flows. The CCTV inspection program provides the District with visual data on internal deficiencies while

the line cleaning program keeps the collection lines free of accumulations of FOG, roots, and other debris. The District has also recently established a minimum size of 8-inch diameter pipe for collection mains.

Schedule: Within the District's modified CIP are tables and lists that schedule rehabilitation and replacement projects. Each of these projects has the anticipated start year for the project. The modified CIP is regularly reviewed with changes being made to the project list and start dates to meet the changing needs of the District. The modified CIP also contains budgetary cost projections for the listed projects. The District maintains a Collection System Replacement Reserve and a Collection System Capacity Reserve as financial vehicles to fund its CIP projects. These reserves are funded by the revenue generated from the District's user fees. Grants and bond sales are additional means the District can utilize to fund its CIP projects.

8.2 Compliance Documents

The documents used for system evaluation and capacity assurance are as follows:

- a. Modified Capital Improvement Plan – located at the District's Administrative Office
- b. Hydraulic Analysis – located at the District's Administrative Office.
- c. Ordinance 64 – located at the District's Administrative Office
- d. Standard Specification for Public Works Construction (Greenbook) – located at the District's Administrative Office.
- e. OVSD Sanitary Collection System Operations and Maintenance Program – located at the District's Administrative Office.
- f. Collection System Replacement Reserve – located in the annual budget report.
- g. Collection System Capacity Reserve – located in the annual budget report.

MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

The Enrollee shall monitor and measure the effectiveness of the SSMP and shall make modifications as necessary to maintain the program’s effectiveness. Under the Order, the Enrollee shall:

- a. Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
- b. Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;
- c. Assess the success of the preventative maintenance program;
- d. Update program elements, as appropriate, based on monitoring or performance evaluations; and
- e. Identify and illustrate SSO trends, including: frequency, location, and volume.

9.1 Compliance Summary

The District has a number of tools available to monitor and measure the progress of its SSMP. Data is housed and tracked in the GIS-integrated database that can be analyzed as needed for ongoing system management. The District’s computerized maintenance management system is used to manage and document work orders for cleaning, maintenance, and inspection. Included are specialized reports that document the maintenance activities for enhanced maintenance areas. Enhanced maintenance areas are areas that require more frequent maintenance due to FOG accumulations or root intrusion. Records of callouts from customers and the District’s SCADA system are maintained and reviewed to determine trends and to adjust maintenance activities. Analysis of all this information indicates the effectiveness of the District’s operational and maintenance practices.

District staff performs an in-house critique after spills or other major events. The District also maintains technical work reviews of its maintenance events. This information is utilized to determine the effectiveness of its SOPs, Disaster Operations Plan (DOP), and other elements of the District’s operations and maintenance program. Records of callouts from customers and the District’s SCADA system are maintained and reviewed to determine trends and to adjust maintenance activities. An annual report summarizing the District’s operation and maintenance practices is prepared and submitted to CSRMA, the District’s insurance carrier.

The District utilizes ongoing CCTV inspection to determine the internal condition of the collection system pipelines. CCTV inspection uses digital video capture and storage which provides easy access for data analysis. The video inspection program provides the District with current and historical visual condition assessments that assist District staff in assessing the effectiveness of line cleaning operations, grease and root control efforts, and predicting when and what type of repair or rehabilitation is required to keep the collection system functioning at the highest level of efficiency.

The District reports all public spills in compliance with the Orders’ Monitoring and Reporting Program. Spill reports are maintained at the District and on the California Integrated Water

Quality System's (CIWQS) online SSO database. Spill reports are analyzed by supervisory staff to determine strategies to prevent future occurrences. Spill response efforts are also analyzed by supervisory staff to determine their efficiency and effectiveness.

9.2 Compliance Documents

The compliance documents are as follows:

- a. Maintenance records and reports from the computerized maintenance management system – located at the District's Administrative Office.
- b. Spill reports – located on the CIWQS online data base or at the District's Administrative Offices.
- c. District's GIS system.
- d. CSRMA Annual Report – located at the District's Administrative Office.

PROGRAM AUDITS

As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements identified in subsection D.13 of the SWRCB Order No. 2006-0003-DWQ, including identification of any deficiencies in the SSMP and steps to correct them.

10.1 Compliance Summary

The Ojai Valley Sanitary District will audit its SSMP on a two-year cycle from the date of initial Board approval of the SSMP. If conditions change that warrant increased audit frequency, the District will adjust its audit cycle accordingly. Audits will review the District's SSMP activities from the time of the last audit and will summarize the data accumulated through its monitoring, measuring, and program modification efforts. Particular attention will be paid to each program's effectiveness in meeting its goals, objectives, and priorities while ultimately being tied into the budgetary process.

The audit process will include the review of additions or improvements made to the collection system during the current audit period and describe planned additions and improvements for the upcoming audit period. Supporting documents will be reviewed to ensure they are up to date and the most recent documents are available and referenced. This process will also ensure that historical documents are kept for future reference.

Data acquired for compliance with Chapter 9 – Monitoring, Measuring and Program Modifications of the SSMP will be summarized every two years to assist with the audit process. Special reports such as the District's annual report to CSRMA, the District's insurance carrier, will also provide data for the audits. Spill information and spill reports are maintained at the District's Administrative Office and on the California Integrated Water Quality Systems (CIWQS) online database. CIWQS data, operations and maintenance records from the Districts computerized maintenance management system, and the District's GIS system will be reviewed, analyzed and summarized for audit purposes.

Employee training is reviewed to ensure programs and mechanisms are in place to provide necessary training, and that all staff is up to date with required training. Training includes on the job requirements, SSMP awareness, safety, required licenses and/or certificates, and professional development.

Completed audits will be retained on file by the District.

10.2 Compliance Documents

The documents used for audit evaluations include the following:

- a. Maintenance records and reports from the computerized maintenance management system – located at the District’s Administrative Office.
- b. Spill reports – located on the CIWQS online data base or at the District’s Administrative Offices.
- c. District’s GIS system
- d. CSRMA Annual Report – located at the District’s Administrative Office.

COMMUNICATIONS

The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented. The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

11.1 Compliance Summary

The District has several active public outreach activities and the District Board encourages public participation in District activities. Time is allowed at each open District Board meeting for public comment. The District maintains a website where information about the collection and treatment systems are publicly available. The District posts documents, such as rates and the current year budget information, for public review. The District also posts information about current and future projects within the District. The “contact us” link on the website is used to solicit feedback from the public. Customer Service Representatives are used by the District to interface with the District's customers, disseminating information and receiving customer feedback on District policies, programs and projects.

The District utilizes its semi-annual newsletter, The Pipeline, specialized publications, and participation in community events and local community groups to disseminate information and solicit feedback on its programs. The Pipeline contains timely information on District programs and projects. District programs are highlighted to explain why they are needed and also offer homeowner tips on how the general public can assist the District with compliance. Current and future CIP projects are explained to make the public aware of what the District is doing to operate, maintain and continually improve the sanitary treatment and collection systems. Past issues of the Pipeline are available on the District's website.

Due to the District's environmentally sensitive location, the District is an active member of Ventura River Habitat Conservation Plan and the Ventura River Watershed Management Plan. By partnering with other local agencies, the District is able to help preserve vital natural resources within the Ojai Valley and the Ventura River. Cooperation and coordination are essential in meeting the goals of restoration and enhancement of the Ventura River and its watershed.

Wastewater flows in the Ojai Valley Sanitary District are generated within the District's jurisdiction. No outside flows are transported into the District's collection system.

11.2 Compliance Documents

The documents used for the communications program include the following:

- a. Ojai Valley Sanitary District's website at <http://ojaisan.org/>.
- b. Pipeline newsletter – available on the District's website and at the District's Administrative Office.
- c. Various specialized publications for public outreach – available at the District's Administrative Office.

GENERAL COMPLIANCE

SSMP and Program Certification

Both the SSMP and the District's program to implement the SSMP must be certified by the District to be in compliance with the requirements set forth above and must be presented to the District's governing board for approval at a public meeting. The District shall certify that the SSMP, and subparts thereof, are in compliance with the general WDRs within the time frames identified in the time schedule provided in subsection D.15 of the SWRCB Order No. 2006-0003-DWQ.

In order to complete this certification, the District's authorized representative must complete the certification portion in the Online SSO Database Questionnaire by checking the appropriate milestone box, printing and signing the automated form, and sending the form to:

State Water Resources Control Board
Division of Water Quality
Attn: SSO Program Manager
P.O. Box 100
Sacramento, CA 95812

The SSMP must be updated every five (5) years and must include any significant program changes. Re-certification by the governing board of the District is required in accordance with D.14 of the SWRCB Order No. 2006-0003-DWQ when significant updates to the SSMP are made. To complete the re-certification process, the District shall enter the data in the Online SSO Database and mail the form to the State Water Board, as described above.

Compliance Summary

The SSMP was presented to the Ojai Valley Sanitary District's Board of Directors for approval on July 27, 2009. The SSMP was next revised in December 2013 and accepted by the Board in January 2014. The revised SSMP was certified by the Board in June 2018. Re-certification of the SSMP will occur every five (5) years from the date of the initial SSMP approval. The next Board re-certification of the SSMP is due in August 2019.

Compliance Documents

The following documents provide the legal basis for the Ojai Valley Sanitary District's approval of the SSMP.

- a. Ojai Valley Sanitary District's Board of Director's meeting minutes from July 27, 2009 – located at the District's Administrative Offices.
- b. Certified SSMP – located at the District's Administrative Offices.
- c. State Water Resources Control Board Order Number 2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems – located at the District's Administrative Offices.