

CITY OF ARROYO GRANDE

Sewer System
Management Plan
Audit Report

August 2018

PREPARED BY



WALLACE GROUP®



CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Shane Taylor
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ACRONYMS AND ABBREVIATIONS

BMP	Best Management Practices
Cal EMA	California Emergency Management Agency (formerly State OES)
Cal/OSHA	California Division of Occupational Health and Safety
CCTV	Closed Circuit Television
CDFW	California Department of Fish and Wildlife
CIP	Capital Improvement Plan
City	City of Arroyo Grande
CIWQS	California Integrated Water Quality System
CWEA	California Water Environment Association
EHS	Environmental Health Services
ELAP	Environmental Laboratory Accreditation Program
EOP	Emergency Operating Procedure
EPA	Environmental Protection Agency
FOG	Fats, Oil, and Grease
FSE	Food Services Establishment
HMA	High Maintenance Area
I/I	Inflow & Infiltration
LRO	Legally Responsible Official
mgd	Million Gallons per Day
MRP	Monitoring and Reporting Program
OERP	Overflow Emergency Response Plan
OES	Office of Emergency Services
PLSD	Private Lateral Sewage Discharge
PM	Preventative Maintenance
R&R	Rehabilitation and Replacement
RWQCB	Central Coast Regional Water Quality Control Board
SCADA	Supervisory Control and Data Acquisition

ACRONYMS AND ABBREVIATIONS

SECAP	Sewer Evaluation and Capacity Assessment Plan
SOP	Standard Operating Procedure
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflow
SSOR	Sewer System Overflow Report
SSSWDR	Sanitary Sewer System Waste Discharge Requirements (Used in this SSMP Audit Report to reference WDR Order No. 2006-0003-DWQ and MRP Order No. WQ 2008-0002-EXEC)
SWRCB	State Water Resources Control Board
WDR	Waste Discharge Requirements

SCOPE AND PURPOSE

The State Water Resources Control Board (SWRCB) Sanitary Sewer System Waste Discharge Requirements Order No. 2006-0003-DWQ as amended by WQ 2008-0002-EXEC and WQ 2013-0058-EXEC (herein SSSWDR) require the City of Arroyo Grande (City) to implement and maintain a Sewer System Management Plan (SSMP).

Wallace Group was contracted by the City of Arroyo Grande to complete an audit of the City's current SSMP in order to evaluate the effectiveness of the SSMP and its implementation. The SSMP Audit measures compliance with SSSWDR Section D.13 and the effectiveness of the City's implementation of the current certified SSMP, Revision 1 dated September 2014 (2014 SSMP, Rev 01), which contains the following SSMP Elements:

- 1.0 [SSSWDR, Section D.13.i]: Goal
- 2.0 [SSSWDR, Section D.13.ii]: Organization
- 3.0 [SSSWDR, Section D.13.iii]: Legal Authority
- 4.0 [SSSWDR, Section D.13.iv]: Operation and Maintenance Program
- 5.0 [SSSWDR, Section D.13.v]: Design and Performance Provisions
- 6.0 [SSSWDR, Section D.13.vi]: Overflow Emergency Response Plan
- 7.0 [SSSWDR, Section D.13.vii]: FOG Control Program
- 8.0 [SSSWDR, Section D.13.viii]: System Evaluation and Capacity Assurance Plan
- 9.0 [SSSWDR, Section D.13.ix]: Monitoring, Measurement, and Program Modifications
- 10.0 [SSSWDR, Section D.13.x]: SSMP Program Audits
- 11.0 [SSSWDR, Section D.13.xi]: Communication Program

AUDIT FORMAT

The SSMP Audit separately evaluates each SSMP Section using the following format:

- Applicable SSSWDR Section
- Audit Finding
- Sufficiency Ranking
- Reference Information
- Deficiencies
- Recommendation of steps and schedule to correct deficiencies

The ranking criteria utilized in the SSMP Audit are provided in Table 1 below:

Table 1: SSMP Audit Ranking Criteria

Ranking	Ranking Basis
In Compliance	All requirements specified in the section are met.
Substantial Compliance	The majority of requirements in the section are met.
Partial Compliance	Half of the requirements in the section are met
Marginal Compliance	Less than half of the requirements in the section are met.
Out of Compliance	None of the requirements in the section are met.

SSMP AUDIT PARTICIPANTS AND SCHEDULE

The SSMP Audit assesses the effectiveness of the City’s 2014 SSMP, Rev 01, and compliance with the SSSWDR Section D.13 requirements. The first purpose of the SSMP Audit is to provide information about successes and challenges in implementing the City SSMP. The second purpose is to identify program or policy changes that may be needed for effective SSMP implementation. This audit report then proposes corrective actions and a schedule to complete them. The SSMP Audit was conducted by the following Wallace Group Staff:

- Bill Callahan
Senior Environmental Compliance Specialist

City of Arroyo Grande Staff participating in the SSMP Audit were:

- Shane Taylor
Utilities Manager
- Tim Schmidt
Water Services Worker

The SSMP Audit was conducted in July 2018. The following table summarizes key dates and locations:

Table 2: SSMP Audit Key Dates

Date	Location	Topic	Participants
July 03, 2018	WG Office and City Office	SSMP Data and Records Request Emailed	S. Taylor, B. Callahan
July 19, 2018	City PW Office	SSMP Audit Kick-off Meeting and Records Retrieval	S. Taylor, T. Schmidt, B. Callahan
July 19 – July 24, 2018	WG Office	Review records and draft Audit Report	B. Callahan
July 24, 2018	City Office	Draft SSMP Audit Report Submission by e-mail to City	S. Taylor, B. Callahan
August 17, 2018	WG Office and City Office	City Comments on Draft SSMP Audit Report Submission	S. Taylor, B. Callahan
August 17, 2018	WG Office and City Office	Finalize Audit Report and Certify	S. Taylor, B. Callahan

SSMP AUDIT RESULTS

The SSMP Audit resulted in a finding that the City’s 2014 SSMP, Rev. 01 is in compliance with five out of eleven subsections of SSSWDR Section D.13, in substantial compliance with six of the subsections and in partial compliance with one subsection. The City has been substantially effective in implementing the SSMP. A summary of these results is presented in Table 3 below:

Table 3: 2018 SSMP Audit Results

SSSWDR Section D.13	SSMP Compliance with Required Subsection	City Effectiveness in the Implementation of SSMP Subsections	Schedule
1. Goal [SSSWDR D.13(i)]	In Compliance	In Compliance	N/A
2. Organization [SSSWDR D.13(ii)]	In Compliance	In Compliance	N/A
3. Legal Authority [SSSWDR D.13(iii)]	In Compliance	In Compliance	N/A
4. Operation and Maintenance Program [SSSWDR D.13(iv)]	Substantial Compliance	Substantial Compliance	Develop, train, and implement Collection System Standard Operating Procedures (SOPs) as soon as possible.
5. Design and Performance Provisions [SSSWDR D.13(v)]	In Compliance	In Compliance	N/A
6. Overflow Emergency Response Plan [SSSWDR D.13(vi)]	Partial Compliance	Partial Compliance	Develop, train and implement Emergency Operating Procedures (EOPs) as soon as possible.

SSSWDR Section D.13	SSMP Compliance with Required Subsection	City Effectiveness in the Implementation of SSMP Subsections	Schedule
7. FOG Control Program [SSSWDR D.13(vii)]	Substantial Compliance	Substantial Compliance	Add SSLOCSD 2008 FOG Ordinance, include City Municipal Code sections and 2018 FSE List
8. System Evaluation and Capacity Assurance Plan [SSSWDR D.13(viii)]	Substantial Compliance	Substantial Compliance	Attach 2012 Wastewater Master Plan and 2017/18 CIP to this Element.
9. Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]	Substantial Compliance	Substantial Compliance	Trend SSOs and Update SSO Monitoring Table in this section.
10. SSMP Program Audits [SSSWDR D.13(x)]	Substantial Compliance	Substantial Compliance	Complete next SSMP Audit by City internal audit schedule (August 2, 2020)
11. Communication Program [SSSWDR D.13(xi)]	Substantial Compliance	Substantial Compliance	Re-create a communication plan for City of Grover Beach, Oceano CSD and SSLOCSD which are satellite and tributary to one another. Include new methods of communication with the public regarding SSMP related activities (ex: website & facebook)

The following sections of this report describe these deficiencies in detail and address future additions and updates the City is required to make to its SSMP. The above list of updates is a summary and is not intended to replace the detailed deficiencies identified in the SSMP Audit Report. The recommendations of the entire SSMP Audit Report should be implemented in a reasonable time frame to ensure compliance with the SSSWDR. The City is due to complete their SSMP 5-Year Update with recertification by the City Council prior to August 2, 2019. It should be noted that the City is doing a good job with their Sewer System Overflow (SSO) reduction efforts when compared to State and Regional municipalities as shown in the tables below:

Comparison to Municipal Agencies 2010-2017

Spill Rate: Number of Spills per 100 miles of Pipe per Year			
	Category 1	Category 2	Category 3
City of Arroyo Grande	.62	0	1.85
State Municipal Average	2.45	1.06	4.35
Region Municipal Average	2.82	1.28	4.86

Category 1 = Spills of any volume that reach surface water.

Category 2 = Spills greater than or equal to 1,000 gallons that do not reach surface water.

Category 3 = Spills less than 1,000 gallons that do not reach surface water.

Comparison to Municipal Agencies 2010-2017

Net Volume of Spills in gallons per Capita per Year			
<i>Net Volume (volume spilled minus volume recovered) of SSOs, for which the reporting Enrollee is responsible, per capita (i.e. the population served by your agency's sanitary sewer system), per year.</i>			
	Category 1	Category 2	Category 3
City of Arroyo Grande	14.45	0	24.73
State Municipal Average	1784.11	408.85	34.72
Region Municipal Average	1572.4	248.75	38.04

1.0 Goal [SSSWDR D.13(i)]

SSSWDR D.13(i) states:

The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

Section D.13(i): The City 2014 SSMP, Rev. 01 includes five (5) goals which were revised to be specific and measurable:

The City of Arroyo Grande seeks to provide a dependable and properly maintained system for wastewater collection for its customers by meeting the following goals:

1. Be available and responsive to the needs of the public, and work cooperatively with local, state and federal agencies to reduce, mitigate, properly report, and respond to SSOs.
2. Properly manage and maintain the City of Arroyo Grande public sewer system mains and lift stations to minimize SSOs.
3. Identify, prioritize, and continuously renew and replace sewer system mains and lift stations to maintain reliability.
4. Implement regular, proactive maintenance of the sewer system to remove roots, debris, sand, and Fats, Oils and Grease (FOG) in areas prone to blockages that may cause SSOs or sewer backups.
5. Coordinate with South San Luis Obispo County Sanitation District (SSLOCSD) to manage and implement the SSLOCSD Pretreatment Program to protect the treatment plant and the environment.

Finding: *Section D.13(i):*

Goal #1 – The City is properly reporting SSOs and corresponding to the State using CIWQS (California Integrated Water Quality System). SSO records were available during the Audit include photos of staff disinfecting sewer spills (mitigate) and documentation was included with response times.

Goal #2 – At the time of the last audit in 2016, the City had four (4) SSOs in 2015 and one (1) SSO to in 2016. Three out of the five SSOs were Category 3 or low threat and not to surface water. Two out of the seven SSOs were Category 1, to a surface water but were less than 1,000 gallons. By comparison, at the time of this Audit, the City experienced one (1) SSO between the 01/10/2017 and 07/19/2019 which was a Category 3, low threat SSO totaling 100 gallons. This shows an 80% reduction in SSOs over a 19-month period.

Goal #3 – The City adopted and is in the process of implementing the projects identified in the December 2012 Wastewater Master Plan. Element 4 contains a discussion and documentation

of projects (sewer pipe re-lining, sewer line replacements, manhole rehabilitation and Lift Station #1 Force Main replacement).

Goal #4 – The City continues to be proactive in several Preventative Maintenance Activities such as Root Treatment in root prone lines, annual system wide line cleaning schedules and hot spot cleaning and a proactive FOG Control program. All of these PM activities are proving to be valuable techniques to reduce the number of SSOs in the system.

Goal #5 – The City continues to identify businesses that are discharging process wastewater or have the potential to discharge chemicals to the City of AG sewer collection system however staff reports that the SSLOCSD Pretreatment Program is no longer actively being implemented.

Element 1 Sufficiency: In Compliance

Reference: 2014 SSMP, Rev. 01. Page 1-1.

Deficiencies: There are no deficiencies.

Recommendation: The City updated its goals in 2014. Records reviewed demonstrate that the City is continuing to work towards achieving their stated goals.

2.0 Organization [SSSWDR D.13(ii)]

SSSWDR D.13(ii) states:

The SSMP must identify:

- (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, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

SSSWDR J states:

All applications, reports, or information shall be signed and certified as follows:

- (i). All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement).
- (ii). An individual is a duly authorized representative only if:
 - (a). The authorization is made in writing by a person described in paragraph (i) of this provision; and
 - (b). The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

Finding: *Section D.13(ii)(a):* The SSMP states that the Director of Public Works is the authorized representative for implementing the SSMP. The name and contact information for the Director of Public Works is shown as Geoff English in Appendix 2-2. The current Director of Public Works for the City is Bill Robeson. The Duly Authorized Representative (Legally Responsible Official (LRO)) is identified as Shane Taylor Utilities Manager in CIWQS. Glenda

Boner is identified as a Data Submitter. This section of the SSMP was updated with a new Organization Chart in the appendix.

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(ii)(b):* The SSMP states which positions are responsible for implementing each SSMP Element in Table 2-1 on Page 2-4.

The names and telephone numbers for management and administrative positions responsible for implementing specific measures in the SSMP program are included in SSMP Appendix 2-2. This Organization Chart was updated in 2018 to reflect recent staff changes.

Lines of authority are presented in SSMP Appendix 2-3.

Conclusion: The section above is in compliance with the above requirements.

Finding: *Section D.13(ii)(c):* A chain of communication for reporting sanitary sewer overflows (SSOs) is provided in Figure 2-2 of the 2014 SSMP, Rev 01 on Page 2-7.

Conclusion: The section above is in compliance with the above requirement.

Element 2 Sufficiency: In Compliance

Reference: 2014 SSMP, Rev 01 p. 2-1 to 2-7 and Appendices 2-1, 2-2 and 2-3. CIWQS Facility At-A Glance Report (July 18, 2018), updated 2018 City Organization Chart.

Deficiencies: None.

Recommendation: Continue to update Organization Charts in SSMP when staff changes occur. Clearly identify the Legally Responsible Official (LRO) and Duly Authorized Representative (DAR) in the SSMP and ensure this information matches in CIWQS.

3.0 Legal Authority [SSSWDR D.13(iii)]

SSSWDR D.13(iii) states:

Each Enrollee must demonstrate, through sanitary system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- (a). Prevent illicit discharges into its sanitary sewer system (examples 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.

Finding: *Section D.13(iii)(a):* Illicit discharges, such as storm water, debris, chemicals, waste, concrete, debris that obstruct, etc., are addressed in South San Luis Obispo County Sanitation District's (SSLOCS D's) Pretreatment Ordinance, Ordinance No. 1994-1, and the following Arroyo Grande Municipal Code Sections:

- 13.12.400 – Prohibited discharges.
- 13.12.410 – Commercial and industrial discharges.
- 13.12.420 – Private systems—Discharges.

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(iii)(b):* Proper design and construction of sewers and connections are required by the City Public Works Department's April 2016 Standards Specifications and Engineering Design Standards, the Uniform Plumbing Code (UPC), and the following Arroyo Grande Municipal Code Sections from Chapter 13.12 Sewer Service System:

- 13.12.110 – Groups of houses or buildings on one lot—Connections to main sewers.
- 13.12.120 – Sewer connections—Applications.
- 13.12.130 – Private systems—Construction—Inspections.
- 13.12.140 – Approval—Required.
- 13.12.150 – Approval—Process.
- 13.12.270 – Inspection required.
- 13.12.370 – Sewer pumps—Backflow valves.

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(iii)(c)*: The City does not own and, therefore, does not require access to maintain or repair any portion of a lateral. The City ensures access for inspection for portions of the lateral owned or maintained by a resident or business in the following Arroyo Grande Municipal Code Sections:

- 13.12.270 – Inspection required.
- 13.12.500 – Right of entry.

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(iii)(d)*: The City has the authority to limit the discharge of FOG and other debris that may cause blockages in the sanitary sewer system through the following City Code and SSLOCSD Ordinances:

- Chapter 13.12 Sewer Service System
- Chapter 13.12.400 Prohibited Discharges
- 1994-1 SSLOCSD Pretreatment Ordinance
- 2008-01 SSLOCSD FOG Ordinance

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(iii)(e)*: City has the authority to enforce any violation of its sewer ordinances in the following Arroyo Grande Municipal Code Chapters and Sections:

- Chapter 1.16 – Penalty Provisions
- Chapter 9.12 – Nuisances
- Section 13.12.470 – Delinquencies—Collection.
- Section 13.12.480 – Delinquencies—Liens.
- Section 13.12.490 – Enforcement—Delegation of duty.
- SSLOCSD Resolution No. 2011-295 - Utilized to enforce any violations of the SSLOCSD FOG Ordinance.

Conclusion: The section above is in compliance with the above requirement.

Sufficiency: In Compliance

Reference: 2009 SSMP, p. 16 – 18; Arroyo Grande Municipal Code Chapters 1.16 – Penalty Provisions, Chapter 9.12 – Nuisances, and 13.12 – Sewer Service System; SSLOCSD Ordinances No. 1994-1 and 2008-01.

Deficiencies: None.

Recommendation: None.

4.0 Operation and Maintenance Program [SSSWDR D.13(iv)]

SSSWDR D.13(iv) states:

The SSMP must include those sections 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 storm water conveyance facilities;
- (b). Describe routine preventive and 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 to 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.

Finding: *Section D.13(iv)(a):* All sewer assets and appurtenances are identified in the map referenced in the 2014 SSMP, Rev 01. Two separate map atlases and map books are maintained by the City identifying sewer assets and storm water conveyance facilities that could be impacted by a SSO. Staff continues to work on redline changes for the sewer system for transfer into the sewer system atlas. The City has integrated sewer maps into GIS and has included storm drain information as an additional layer for this mapping system. A formal update to the City's storm water and sewer maps are being completed and are planned for inclusion in the next update to the SSMP.

Conclusion: The section above is in compliance with the above requirements

Finding: *Section D.13(iv)(b):* The 2014 SSMP, Rev 01 summarizes goals and routine preventative and corrective Operation and Maintenance (O&M) activities in this section. O&M relating to sewer line; cleaning, inspection, and minor sewer line repairs are performed by City staff.

Routine O&M for the five (5) City Lift Stations are conducted by City maintenance staff. Lift Stations are inspected and maintained once a week as described in the City of Arroyo Grande Performance Standard Activity Code: 315 - Lift Station Maintenance. Contractors are hired to perform maintenance and repair when significant electrical maintenance or mechanical work is required.

Sewer line cleaning activities are organized in the City's 2012 Sewer Main Cleaning Program. Cleaning schedules are divided into twelve (12) distinct sections which are identified in a sewer system map book. Line cleaning records are entered into the City's Sewer Main Cleaning Program Route Sheets.

The City's SSMP states that the goal for line cleaning is to clean and flush the entire system annually. While the City has met this goal in the past, CCTV assessments conducted since 2014 have resulted in the City Utilities Manager revising the 2014 SSMP, Rev 01 to change this goal to clean lines every 2 years.

Records documenting manhole inspections, sewer line cleaning and the current version of the City sewer atlas were viewed, and recent examples were reviewed. These records are kept on a bookshelf in the PW Corp Yard break area.

During the 2018 Audit, City Sewer Maintenance staffing levels consists of 2 full time maintenance positions who are supported by a City water system staff of six (6) full time employees.

Areas needing more frequent cleaning; High Maintenance Areas (HMAs) or Problem Areas are discussed in the 2014 SSMP, Rev 01 and scheduled for quarterly cleaning. When problems are found during sewer line cleaning activities, a CCTV inspection is conducted by City staff using a push camera to determine the conditions of the line. The push camera is only able to view a few hundred feet of sewer line, the City uses a contractor for more comprehensive inspections on an as needed basis. Records of all CCTV data are kept at the Public Works Department and utilized to identify future rehabilitation and replacement projects.

The City continues to use chemical root control as a method to address HMAs. The City utilizes Duke Root Control for root treatment. Chemicals applied for root control are expected to be effective for the next 3 years.

Manholes receive detailed inspection during routine sewer line cleaning. A form entitled Manhole Observation and Inspection Report is completed for each manhole for future assessment by City staff to create rehabilitation and replacement projects. Manhole rehabilitation Capital Improvement Project (CIP) is part of the 2017/18 budget and is also included as a CIP for FY 2020/21.

The 2014 SSMP Rev 01 states that the City will purchase a Computerized Maintenance Management System (CMMS) and implemented by the end of 2015. This task was

accomplished, the CMMS system “Facility Dude”, however the City found this software did not meet their needs and Preventative Maintenance is now scheduled and tracked on a Master Schedule at the Public Works Department which generates daily work orders. These preventative maintenance activities are reported monthly to the City Council.

Conclusion: The section above is in compliance with the above requirements.

Finding: *Section D.13(iv)(c):* The City completed a Wastewater System Master Plan in 2012. The 2014 SSMP, Rev 01 describes the specific methods and a plan used to identify R&R projects. A specific plan and schedule (City CIP through 2017/18) to identify and address defects in pipelines, manholes, lift stations, and other appurtenances is included in Appendix 4-2 of the SSMP. Additionally, the City has identified capital projects in the FY 2018/19 Budget identified in the 2012 study through FY 2022/23.

The 2012 Wastewater System Master Plan, included in Appendix 4-10 of the SSMP, addresses the majority of the requirements in this section. This Master Plan provides an assessment of the City’s sewer system; Lift Stations, Force Mains, Manholes, and Sewer Line wet and dry weather capacities. CCTV inspections for approximately 60% of the system were also integrated as part of the sewer line assessments referenced in the 2012 Master Plan. This plan includes a prioritized list of projects identified to take place between 2013 and 2037. Projects are grouped by a Priority Ranking of “A”, “B”, and “C”. Project schedules are as follows:

- Priority “A” Projects to be conducted between 2013 and 2017
- Priority “B” Projects to be conducted between 2018 and 2027
- Priority “C” Projects to be completed between 2028 and 2037

A short and long-term CIP and associated schedule was developed based on the results of the WSMP report through Fiscal Year (FY) 2022/23. The City completed and finalized a Revenue Rate study in June 2014 to fund these projects. The City Utilities Manager updated Appendix 4-11 on July 18, 2016 with the final Revenue Rate Study. The City is planning a new rate study planned for FY 19/20 which should be included in the next update to the SSMP.

Conclusion: The section above is in compliance with the above requirements.

Finding: *Section D.13(iv)(d):* The 2014 SSMP, Rev 01 states that Staff receives training in system operations and maintenance, safety, and reporting procedures for SSOs.

Records for safety training and some routine operations and maintenance activities were reviewed and are on file at the City Public Works Department.

The 2014 SSMP, Rev 01 contains a list of Standard Operating Procedures for Collection System Operation and Maintenance to be developed and commits to having a RFP issued in October 2014 and the SOPs in place and a training program developed by the end of 2015.

The Utilities Manager reports that this task has not been initiated and is planned for a date yet to be determined. The City SSMP does include a SOP for operation of the City Vector Truck and standards for Lift Station Operations and Sewer Line Cleaning. The Utilities Manager reports

that staff has trained on this SOP and standards however training records were not available at the time of this audit.

The City does not employ contractors that would require training in general O&M tasks as they are performed by City staff. Contractors who are hired by the City are required to be adequately licensed to perform tasks identified in the scope of work identified in each contract.

Conclusion: The section in partial compliance with the above requirements.

Finding: *Section D.13(iv)(e):* The 2014 SSMP, Rev 01 in Appendix 4-5 contains a list of critical parts and equipment for all assets and equipment used in the sewer system and Page 4-6 contains a vendor list with contact information for parts and equipment that are not easily or reasonably stocked. This list should be updated to identify current equipment in stock and other equipment that is not currently included in this list such as spill response equipment.

The City participates in two (2) separate mutual aid agreements for critical parts and equipment; CAL WARN, and the San Luis Obispo County Mutual Aid Agreement. The City also works informally with the City of Grover Beach and South San Luis Obispo County Sanitation District to maintain a list of critical parts and equipment that may be used in the event of a SSO.

Conclusion: The section above is in compliance with the above requirements.

Sufficiency: Substantial Compliance

Reference: 2014 SSMP, Rev 01 p. 4-1 to 4-6. Appendix 4.

1. Sewer Main Cleaning Program Route Sheets
2. District Trunk Line Manhole Observation and Inspection Report.
3. Safety Training Meeting Record. 6/15/16.
4. June 2014 City of AG Water and Wastewater Rate Study Report.
5. Work Order example pages
6. City of AG CIP, FY 2016-17/FY 2018-19/FY 2019/20 Biennial Budget. Lift Station No. 1 Force Main Replacement, Manhole Rehabilitation, Sewer Main Rehabilitation Projects.
7. Maintenance Worker Safety Training Records.
8. Invoice dated 5/15/18 from Dukes Root Control.

Deficiencies: Training on existing Operational Standards and Vector SOP were not available. Collection system operation and maintenance standard operating procedures (SOPs) were not written and developed.

Recommendation: Include updates to the City storm water and sewer maps in the next SSMP update. Develop written Standard Operating Procedures for the operation and maintenance of the sewer system. Develop a formal training program for annual training and documentation of these activities.

5.0 Design and Performance Provisions [SSSWDR D.13(v)]

SSSWDR D.13(v) states:

- (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.

Finding: *Section D.13(v)(a):* The 2014 SSMP and City Municipal Code contain the City's design and construction standards. The City Municipal Code addresses the expected standards for conducting repairs and new construction related to the sewer system in the following sections:

- Section 13.12.120: Sewer Connections – Applications
- Section 13.12.130: Private Systems – Construction – Inspections
- Section 13.12.270: Inspection Required

On April 12, 2016 the City Council approved Standard Specification and Engineering Standards for the sanitary sewer system. The standards are located on the City website at www.arroyogrande.org/document-center/standards/engineering-standards/.

The City updated their Standards in April 2016. Standard Specifications and Engineering Design standards. Are found on the City's website at:

<http://www.arroyogrande.org/DocumentCenter/View/3151/2016-Standard-Specifications-and-Engineering-Standards> .

The City additionally requires all work to be in compliance with the California Uniform Plumbing Code (UPC), approved by the Public Works Director, and permitted by the City.

Conclusion: The section above is in compliance with the above requirements.

Finding: *Section D.13(v)(b):* In April 2016 Standard Specifications and Engineering Design standards were updated and include inspection and testing requirements for sanitary sewers.

Conclusion: The section above is in compliance with the above requirements.

Sufficiency: In Compliance

Reference: 2014 SSMP, p. 5-1; Arroyo Grande Municipal Code Section 13.12; April 2016 City Public Works Department Standard Plans and Specifications for Public Works Construction. The April 2016 City Standards are located at www.arroyogrande.org/document-center/standards/engineering-standards/.

Deficiencies: None.

Recommendation: Include these new 2016 standards by reference in the next update of the SSMP.

6.0 Overflow Emergency Response Plan [SSSWDR D.13(vi)]

SSSWDR D.13(vi) states:

Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, the 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 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 Monitoring and Reporting Program (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 identifies the officials who will receive immediate notification;
- (d). Procedures to ensure that appropriate staff and contract 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 or partially treated wastewater to waters of the United States and 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.

Finding: *Section D.13(vi)*: The 2014 SSMP, Rev 01 on pages 6-1 to 6-10 contains the City Overflow Emergency Response Program (OERP).

Finding: *Section D.13(vi)(a)*: Section 6.2 of the 2014 SSMP, Rev 01 contains the SSO Response Plan and Polices. Figure 6-1 on Page 6-3 of the City OERP includes the City's SSO Reporting Chain of Command. This figure describes how the City is notified of a SSO and how staff is dispatched to a SSO through the City Public Works Department or 5 Cities Fire Authority. Figure 6-2, Response/Notification Procedure for SSOs on Page 6-4 to 6-5 contains the detailed description on how to report and notify all appropriate agencies in the event of a SSO.

Finding: *Section D.13(vi)(b):* A detailed overview of SSO response was provided and associated procedures showing key positions and their responsibility to ensure appropriate response to all overflows was found in Section 6.2.

Finding: *Section D.13(vi)(c, (d), and (e):* Section 6.5 of the 2014 SSMP, Rev 01 stated that ten Emergency Operating Procedures (EOPs) will be completed and implemented by the end of 2015. The EOPs were not completed. During the last audit the Utilities Manager revised this section of the 2014 SSMP to change the date to the end of 2017. This task was not completed at the time of this audit however the City reports that still intends to develop formal emergency operating procedures for SSO response at a future time that has not been determined.

Finding: *Section D.13(vi)(f):* The City OERP summarizes how staff are to be trained annually to respond to and contain a SSO.

Conclusion: The sections above are Partial compliance with the above requirements. See recommendations at the end of the OERP section of this report.

Sufficiency: Partial Compliance

Reference: 2014 SSMP, Rev 01, p. 6-1 to 6-10 and Appendix 6.

Deficiencies: Emergency Operating Procedures for response to SSOs must be developed. Training on these procedures should be conducted on an annual basis or more frequently as warranted.

Recommendation: Create the required EOPs as soon as possible as required by sections D.13(vi).a, b, c, and d.

7.0 FOG Control Program [SSSWDR D.13(vii)]

SSSWDR D.13(vii) states:

Each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an 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) and the development of design standards for such 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 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 sewer system for each section identified in (f) above.

Finding: *Section D.13(vii):* The City implemented a FOG program in July 2007 as FOG is an ongoing problem in the sewer collection system. The City has over seventy (70) food service establishments (FSEs) in its service area. From 2009 to 2013 the FOG program was implemented through an agreement with South San Luis Obispo County Sanitation District (SSLOCSD). The City of AG is a satellite agency to SSLOCSD. Since 2013 a private engineering consulting firm manages the FOG Program for the City.

In this Audit, the FOG Control Program presented in the 2014 SSMP, Rev 01 was evaluated against the SSSWDR Section D.13(vii) requirements included above. The effectiveness of the FOG Control Program is evaluated at the end of this section.

Finding: *Section D.13(vii)(a):* The 2014 SSMP, Rev 01 describes public outreach for FOG from its inception in 2007. Public education is conducted with FSEs during semiannual inspections each fiscal year. An assortment of literature is distributed to each FSE, including: best management practices, certified grease hauler list, cleaning record forms, and no grease posters for display in FSE kitchens. Inspectors discuss program parameters and strategies to keep FOG from entering the sewer system during each inspection. Public education and outreach is documented for FSE's within the City limits.

For residential outreach, the City publishes residential flyers that are available at the City Public Works office and City Hall. City sewer staff have door hangers when

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(vii)(b):* The 2014 SSMP, Rev 01 states that information concerning how FSE's can dispose of FOG generated within the City's service area is disseminated under the FOG FSE education program. A list of companies FSEs may utilize for the collection and disposal of FOG in SSMP Appendix 7-5.

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(vii) (c, d, e):* The 2014 SSMP, Rev 01 includes a reference to the SSLOCSD FOG Ordinance 2008-01. The City's SSMP does not reference the Arroyo Grande Municipal Code sections which regulate FOG Control. The 2014 SSMP, Rev 01 states that the SSLOCSD FOG Ordinance 2008-01 is included in Appendix 7, but this Ordinance is not referenced on the Element 7 cover sheet or included in the appendix.

Conclusion: The sections above are in substantial compliance with the above requirements.

Finding: *Section D.13(vii)(f):* The City identifies sections of the collection system, which are subject to grease blockages and identifies where the cleaning maintenance schedule for these high maintenance areas (HMAs) is located (City Corp Yard office).

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(vii)(g):* The 2014 SSMP, Rev 01 provides information regarding the development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system. The City continues to implement source control measures identified in the SSMP.

Since 2014, a private firm is directly contracted by the City to manage and implement the City FOG Control Program. Management includes the issuance of a permit to each FSE as a control mechanism and semi-annual inspections, re-inspections when violations are identified, notices of non-compliance are issued after repeat violations and eventually fines are administered.

End of month (EOM) reports are submitted to the City by the contractor, the last report was issued May 2018. The EOM report summarizes how many inspections were conducted, number of permits issued, how many FSE's had violations, enforcement of violations and correspondence with the FSE's.

The FOG Files reviewed and attached to this audit include:

- May 2018 EOM Report
- City of AG FOG Control Program Master Inspection Spreadsheet

Conclusion: The section above is in compliance with the above requirement.

FOG Program Effectiveness: A review of the City's Collection System Operational Report generated on CIWQS July 19, 2018, shows the City has experienced only one (1) FOG related SSO since 2012 out of the nine (9) total SSOs occurring over this time period. This indicates the City fog related SSO rate is approximately 11%, compared to State and National averages which report FOG SSO rates between 75% - 85%. This serves as an indication that the current FOG program is an effective preventative maintenance tool to reduce SSOs.

Sufficiency: Substantial Compliance

Reference: The following references were used:

- 2014 SSMP, Rev 01, p. 7-1 to 7-7 and Appendix 7
- Arroyo Grande Municipal Code Chapters 1, 9, and 13
- SSLOCD FOG Ordinance, Ordinance No. 2008-01
- Collection System Operational Report (July 18, 2018)
- May 2018 FOG End of Month Report
- City of AG FOG Control Program Master Inspection Spreadsheet

Deficiencies: Update the 2014 SSMP, Rev 01 with the SSLOCD FOG Ordinance 2008-01 and Sections of City Municipal Code identified above.

Recommendation: The SSMP should be updated annually to include a current list of FSEs, FOG Control Program statistics, or other information, which would be useful to the City for implementing its FOG Control Program.

The City needs to update the SSMP with the information above and attach a copy of the 2008 SSLOCD FOG Ordinance No. 2008-01 and the relevant Sections of the City Municipal Code to Appendix 7.

8.0 System Evaluation and Capacity Assurance Plan [SSSWDR D.13(viii)]

SSSWDR D.13(viii) states:

The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system sections 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 a SSO discharge 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 (a) above to establish appropriate design criteria; and
- (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.
- (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 D.14.

Finding: *Section D.13(viii)(a):* The City uses the hydraulic model created in the 2012 Wastewater System Master Plan (2012 WSMP) located on the City website at: <http://www.arroyogrande.org/DocumentCenter/Home/View/1066> to determine issues of capacity for all new development process. This Master Plan is also located in the appendix to Element 4 of the SSMP.

The 2012 WSMP provides hydraulic evaluations of City: lift stations, force mains, and gravity sewer lines. Hydraulic evaluations were conducted to model existing dry and wet weather conditions and future dry and wet weather conditions expected at “build out”, which represent “worst case scenario” flow conditions. The City has not experienced a history of SSOs related to deficient system capacities.

Conclusion: The section above is in compliance with the above requirements.

Finding: *Section D.13(viii)(b):* Design criteria were identified in the 2012 WSMP and used in system modeling to assess the hydraulic conditions existing in the system. These criteria were used to make recommendations for hydraulic upgrades in City lift stations, force mains, and gravity sewer lines.

Conclusion: The section above is in compliance with the above requirements.

Finding: *Section D.13(viii)(c) – (d):* This plan includes a prioritized list of projects identified to take place between 2013 and 2037. Projects are grouped by a Priority Ranking of “A”, “B”, and “C”. Project schedules are as follows:

- Priority “A” Projects to be conducted between 2013 and 2017
- Priority “B” Projects to be conducted between 2018 and 2027
- Priority “C” Projects to be completed between 2028 and 2037

A short and long-term CIP and associated schedule was developed based on the results of the WSMP report through Fiscal Year (FY) 2022/23. The City completed and finalized a Revenue Rate study in June 2014 to fund these projects. The City Utilities Manager updated Appendix 4-11 on July 18, 2016 with the final Revenue Rate Study. The City is planning a new rate study planned for FY 19/20 which should be included in the next update to the SSMP.

The 2012 WSMP and a project summary, status update and schedule for capital projects should be included in the next update of the SSMP. The findings of the revenue rate plan and subsequent rate structure to support capital improvements should also be included in this update.

Conclusion: The sections above are in compliance with the above requirements.

Sufficiency: Substantial Compliance

Reference: 2014 SSMP, Rev 01; 2012 WSMP; 5-Year Capital Improvement Program Budget: 2017-2018.

Deficiencies: None.

Recommendation: Include a copy of the 2012 WSMP and most recent CIP as an Appendix to Element 8.

9.0 Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]

SSSWDR D.13(ix) states:

The Enrollee shall:

- (a). Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
- (b). Monitoring the implementation and, where appropriate, measure the effectiveness of each section 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.

Finding: *Section D.13(ix)(a):* The City utilizes Work Orders to keep records of preventative maintenance and rehabilitation and replacement activities and maintains a folder of SSO records, which can be used to establish and prioritize appropriate SSMP activities.

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(ix)(b) and (c):* The SSMP states that the SSMP will be reviewed annually to ensure all the provisions are implemented and that the effectiveness will be monitored.

Items of Interest staff reports are submitted to the City Council by the City Manager once a month. These reports provide updates on significant work completed on the sanitary sewer system, such as line cleaning, lift station cleaning, manhole inspections, and CIPs. Reports are utilized to monitor the implementation of the City's preventative maintenance and rehabilitation and replacement activities.

Conclusion: The section above is in compliance with the above requirement.

Finding: *Section D.13(ix)(d):* The City's 2014 SSMP, Rev 01 contains red-line updates documenting changes to plans and schedules.

Conclusion: The section above is in substantial compliance with the above requirement.

Finding: *Section D.13(ix)(e):* The City has identified roots, debris and FOG to be the primary causes of SSOs in its sanitary sewer system and has continued to address these causes by applying root control chemicals to root prone areas, a scheduled line cleaning and hot spot cleaning program and implementation of a FOG Control program.

Conclusion: The section above is in compliance with the above requirement.

Sufficiency: Substantial Compliance

Reference: 2014 SSMP, Rev 01.p. 9-1 to 9-6. and Appendices 9; Example SSO Reports, CIWQS Public Report - Detail Page..

Deficiencies: The City needs to update Table 9-2, Number of City SSOs per Indicator Year. The City needs to create a Revision Tracking Table to identify and illustrate trends as required by D.13(ix)(e).

Recommendation: Update Table 9-2 using CIWQS SSO Public Report (Detail Page) in next update to the SSMP.

10.0 SSMP Program Audits [SSSWDR D.13(x)]

SSSWDR D.13(x) states:

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 this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

Finding: *Section D.13(x):* SSMP audits are required to be performed a minimum of every two years from the date of the initial required adoption, August 2, 2009. The first SSMP Audit was performed before August 2, 2011. The second was completed July 17, 2012 before the August 2, 2013 deadline. The third SSMP Audit was due August 2, 2015 and was completed one year late due to the City adjusting their Audit schedule based on a recent 2014 SSMP Update. Based on this new schedule, the City was compliant in meeting their internal Audit goal date of August 2, 2018 with the completion of this (4th) Audit in July 2018.

Sufficiency: Substantial Compliance

Reference: 2014 SSMP, Rev. 01, Section 10.2 page 10-1 to 10-3

Deficiencies: The Utilities Manager not met the City's internal schedule to complete the two-year SSMP Audit due date prior to August 2, 2018. The formal due date based on the original adoption date of the SSMP in 2009 would require an Audit in 2017 rather than 2018.

Recommendation: Continue to conduct Audits at a minimum of every 2 years to meet the City's internal Audit schedule.

11.0 Communication Program [SSSWDR D.13(xi)]

SSSWDR D.13(xi) states:

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.

Finding: *Section D.13(xi):* City Council meeting continue to be held on the 2nd and 4th Tuesday of each month and are televised. The agenda and supporting staff reports are posted in advance of each meeting on the City website (www.arroyogrande.org).

Monthly Items of Interest memorandums are submitted to the City Council by the City Manager. These memorandums provide the City Council with more detailed updates on significant work completed by each department in the City, including Public Works. The Public Works section includes information about the sanitary sewer system, such as line cleaning, lift station cleaning, manhole inspections, and CIPs.

The 2014 SSMP, Rev 01 is available to the public on the City webpage located here: <http://www.arroyogrande.org/documentcenter/view/1957>. A document entitled "Sewer Emergency Guidelines" is also located on the City webpage.

The public was also updated on City collection system issues through the City's newsletter, Stagecoach Express until June 2015 when the newsletter was discontinued. Upgrades to the City website (www.arroyogrande.org) were made and the City considers it to be more effective to communicate to the public using social media (Twitter, Facebook, and press releases on the City website).

The City of Arroyo Grande, City of Grover Beach, and Oceano Community Services District manage and operate sanitary sewer systems, which are satellite to SSLOCSD's sanitary sewer system. Collection System Coordination Meetings were held from 2013 – 2015 but were discontinued. A new plan for communication with agencies that you are tributary/satellite too should be developed.

The City also has four neighborhoods with small, private collection systems, which are within the City limits and discharge into the City's collection system; it is recommended that the City continue to reach out to these private collection systems annually in a memo about non-flushables, FOG, etc.

Sufficiency: Substantial Compliance

Reference: 2014 SSMP, Rev 01 p. 11-1.

Deficiencies: A plan of communication with systems that are tributary and satellite to the City of AG sanitary sewer system existed and must be re-instated.

Recommendation: Reestablish collection system coordination meetings with SSLOCSD, City of Grover Beach and Oceano Community Services District. Include new sources of communication with the public on issues pertinent to the SSMP and sewer collection system in the next update to the SSMP.

RECORDS LIST BY SSMP ELEMENT

Records were reviewed and are on file at the City of Arroyo Grande Public Works Department Office

1. **Goal**
 - a. See records under SSMP Elements 3 – 11
2. **Organization**
 - a. CIWQS Facility At-A Glance Report (July 19, 2018)
 - b. Updated 2018 Organization Chart
3. **Legal Authority**
 - a. Arroyo Grande Municipal Code Chapters 1.16 and 13.12
 - b. SSLOCSD Pretreatment Ordinance, Ordinance No. 1994-1
 - c. SSLOCSD FOG Ordinance, Ordinance No. 2008-01
 - d. SSLOCSD Resolution No. 2011-295
4. **Operation and Maintenance Program**
 - a. 2012 Wastewater System Master Plan
 - b. 5/15/18: Dukes Root Control Root Treatment Invoice
 - c. 2017/18 – 2019/20 CIP Budget
 - d. City Sewer Atlas 2008
 - e. City Storm Drain Atlas 2008
 - f. 2018 Work Order Detail Report Sewer Main Cleaning
 - g. 2018 Annual Project Calendar (Maintenance Schedule)
 - h. 2018 Sewer Main Cleaning Program Route Sheet
 - i. SSLOCSD: District Manhole Observation and Inspection Report
5. **Design and Performance Standards**
 - a. Arroyo Grande Municipal Code Chapter 13.12
 - b. 2016 City of Arroyo Grande Revised Standard Specifications and Engineering Standards for Construction.
6. **Overflow Emergency Response Plan**
 - a. City Sewer Spill Report: 2017
7. **Fats, Oils, and Grease Program**
 - a. May 2018 FOG End of Month Report
 - b. City of AG FOG Control Program Master Inspection Spreadsheet
8. **System Evaluation and Capacity Assurance Plan**
 - a. City of Arroyo Grande Wastewater System Master Plan (December 2012)
 - b. CIP Budget: 2018/19 – 2019/20
9. **Monitoring, Measurement, and Program Modifications**
 - a. CIWQS Facility At-A Glance Report (July 19, 2018)

10. SSMP Program Audit

- a. City 2016 SSMP Audit Report
- b. City 2016 Pre-Audit Data and Records Request

11. Communication Program

- a. 2018 Items of Interest Memos to City Council providing a monthly update of public works activities and capital projects.
- b. FY 2016/17 City of AG Goals Summary
- c. City of AG Sewer Emergency Guidelines