

CITY OF NEWPORT BEACH

SEWER SYSTEM MANAGEMENT PLAN

(SSMP)

September 2019



Prepared By:
City of Newport Beach Utilities Department

SEWER SYSTEM MANAGEMENT PLAN

Introduction

The State Water Quality Control Board ("State Board") regulates and oversees water quality in California including the shoreline and Upper and Lower Newport Bay. In the past, beaches along the coast have been closed numerous times due to contaminated surface water runoff and wastewater spills (also known as sanitary sewer overflows or "SSOs") and the closures impacted the economy associated with summer beach activities.

In 2006, in response to the beach closures, the State Board adopted General Waste Discharge Requirements (WDRs) for the operation of sewage collection systems. The WDRs apply to all the sewer system owners or operators in California who operate a sanitary sewer system greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California. Therefore, these regulations apply directly to the City of Newport Beach and its collection system.

One of the requirements of the WDRs is preparation and implementation of a Sewer System Management Plan (SSMP). By preparing and practicing the procedures in the plan, SSOs should decrease or stop entirely. The City believes that it is currently adhering to all of the SSMP requirements due to the City's history of taking a proactive approach to sewer system management. The City completed its Sewer Master Plan in July 2009.

On July 28, 2009, the Utilities Department recommended that the City Council formally adopt the SSMP, directing the Department to continually update the plan and bring it back to Council at appropriate intervals for additional consideration and approval. The SSMP was subsequently updated in July 2014 and adopted by City Council on July 8, 2014. This 2019 SSMP is scheduled to be approved by City Council on November 19, 2019.

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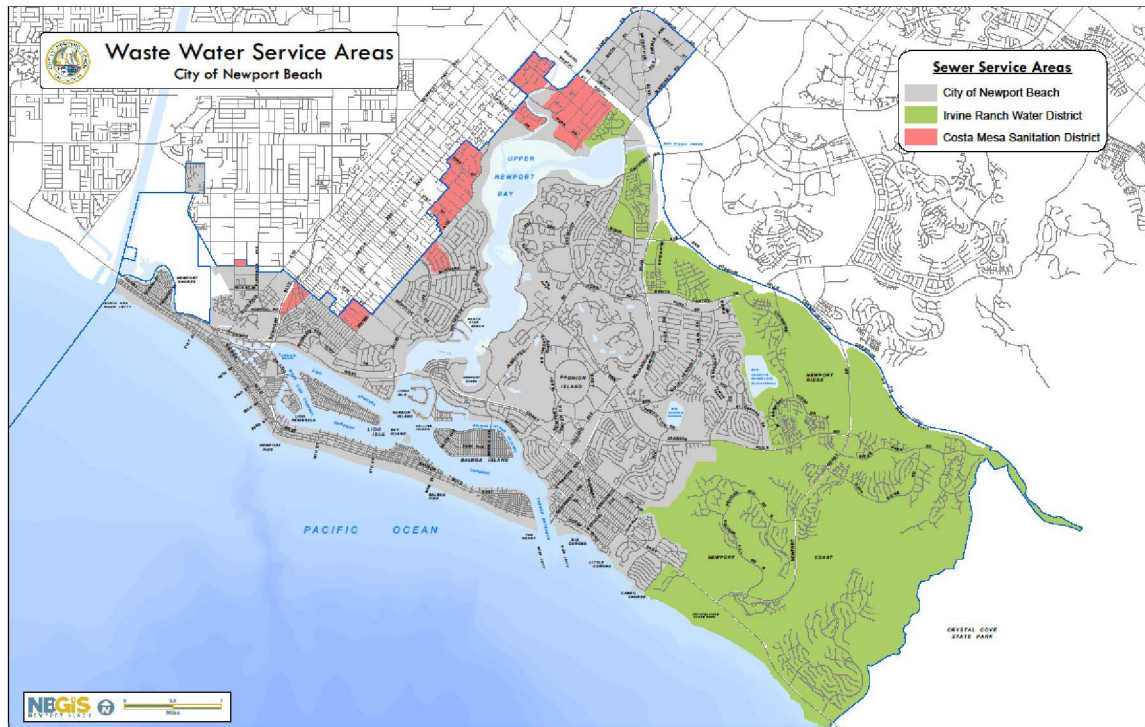
City of Newport Beach Wastewater (Sewer) System at a Glance:

Wastewater



Utilities Department

- 203 miles of sewer pipe
- 120 miles of sewer laterals
- Plus 5,000 manholes
- 21 pump stations
- 5 miles of force mains



Section I Sewer System Management Plan Goals:

The General Waste Discharge Requirements for the Goals section of the Sewer System Management Plan state that the City must develop goals to properly manage, operate, and maintain all parts of its wastewater collection system in order to reduce and prevent SSOs, as well as to mitigate any SSOs that occur.

The main goal of the Sewer System Management Plan (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. The City of Newport Beach recognizes the importance of protecting public health and ocean water quality by preventing sewer spills. The City supports the Waste Discharge Requirements (WDRs) for the operation of sewage collection systems.

In order to minimize sanitary sewer overflows (SSOs) and mitigate the effects of SSOs that may occur, the goals of the City of Newport Beach Sewer System Management Plan are to:

1. Maintain uninterrupted sewage flow without health hazard, effluent leakage, or water infiltration and inflow.
2. Operate a sanitary sewer system that meets all regulatory requirements.
3. Avoid sanitary sewer overflows and respond to sanitary sewer overflows quickly and mitigate any impact of the overflow.
4. Maintain standards and specifications for the installation of new wastewater systems.
5. Verify the wastewater collection system has adequate capacity to convey sewage during peak flows.
6. Provide training for Wastewater Collection staff.
7. Maintain the Fats, Oil, and Grease program (FOG program) to limit fats, oils, grease, and other debris that may cause blockages in the wastewater collection system.
8. Identify and prioritize structural deficiencies and implement short-term and long-term maintenance and rehabilitation actions to address each deficiency.
9. Meet all applicable regulatory notification and reporting requirements.
10. Provide excellent customer service through efficient system operation and effective communication strategies.

Section II – Organization:

The General Waste Discharge Requirements for the Organization section state that the City’s Sewer System Management Plan must identify:

- (a) The name of the responsible or authorized representative;*
- (b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the Sewer System Management Plan program. Include lines of authority as shown in 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, and/or State Office of Emergency Services (OES))*

Within the City of Newport Beach’s Utilities Department, the Wastewater Division oversees operation and maintenance of the system with a Utilities Manager, a Wastewater Supervisor and a team of operators. The staff is organized into three main crews to conduct pipeline maintenance, pump station maintenance and construction repair operations. Wastewater Collection staff responds to all sewage spills seven days a week, 24-hours a day.

The authorized representative, or legally responsible official (LRO), for the implementation and administration of the City’s SSMP is Mark Vukojevic, Utilities Director. Mr. Vukojevic is responsible for the development and oversight of this program and ensuring that the City is in compliance with the WDRs.

- (a) The name of the responsible or authorized representative as described in Section J of the Order.**

The authorized representative is:

Mark Vukojevic P.E., Utilities Director, (949) 644-3011.

Backup representatives are:

Jim Auger, Utilities Manager, (949) 644-3011

Mike Lynch, Wastewater Supervisor, (949) 644-3011

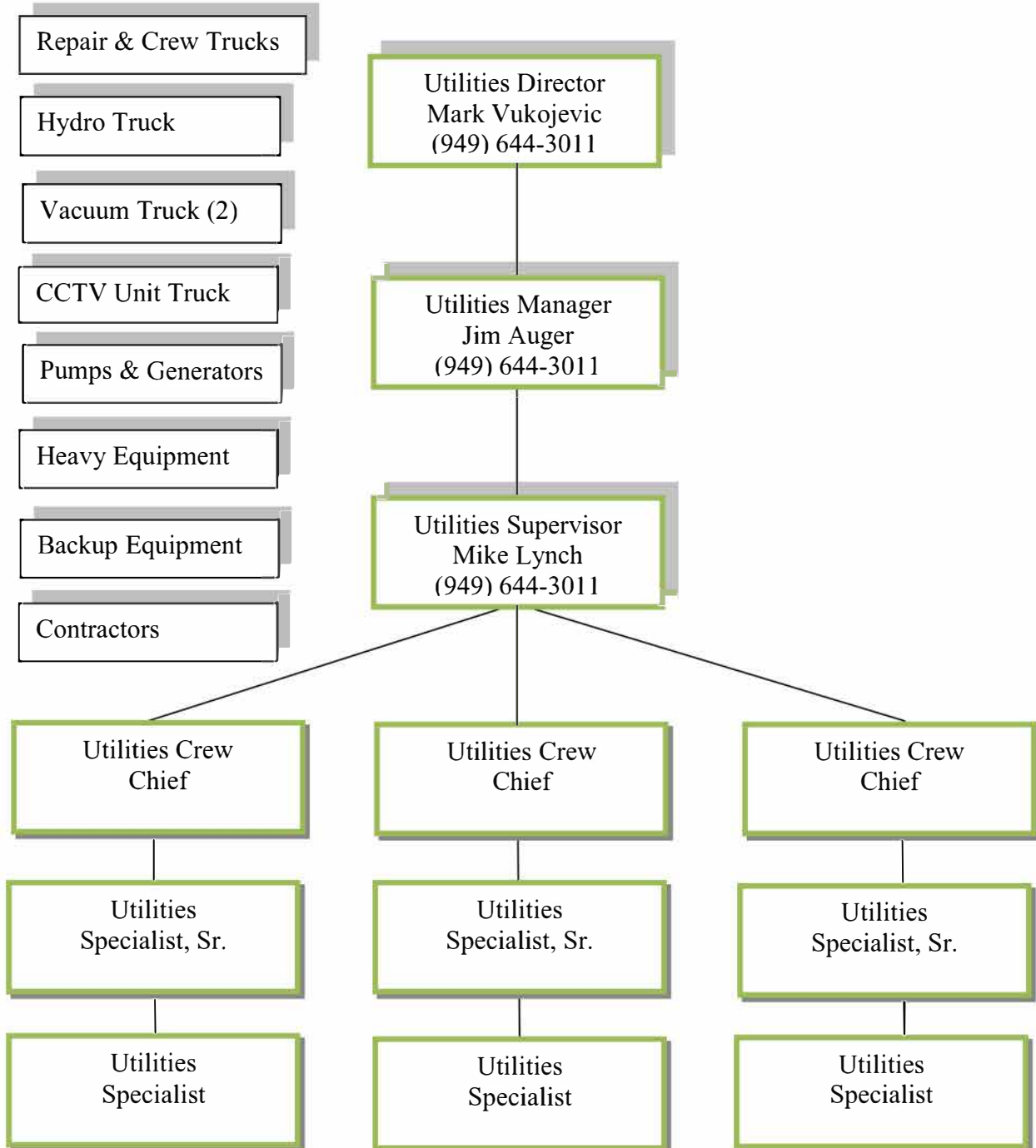
- (b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program are listed below:**

Below is the Organizational Chart showing the lines of authority for all the field staff and their respective responsibilities for the Wastewater Division of the Utilities Department.

The contact phone number for Utilities Department, Wastewater Division is (949) 644-3011, during working hours;

After hours, the Police Department is contacted at (949) 644-3717. The Police Department will then dispatch an authorized Utilities staff member who is on standby to respond.

ORGANIZATIONAL CHART FOR WASTEWATER DIVISION



EMERGENCY RESPONSE PROGRAM RESPONSIBILITIES

- Utilities Director** The Utilities Director oversees the implementation of the SSMP including providing staff and other resources necessary to operate and maintain the sanitary sewer system. The Utilities Director also coordinates with the Public Works Department to implement sewer-related projects as part of the City's Capital Improvement Program. The Utilities Director ensures that line-response personnel have all funding and authority needed to effectively act on their obligations under the SSMP. The Director provide policy guidance where needed.
- Utilities Manager** The Utilities Manager provides direction and feedback to the Utilities Supervisor regarding operational needs and requirements. The Utilities Manager oversees implementation of operation and maintenance elements of the SSMP including reviewing daily maintenance activities and managing the City's asset maintenance management system. The Manager supports the Utilities Supervisor and field crews.
- Utilities Supervisor** The Utilities (Wastewater) Supervisor directs field crews with the day-to-day operations and assignments of the Wastewater Division and structures emergency response operations based on experience and utilization of field staff available. The Supervisor responds to SSO events.
- Field Crews** The Field Crews, (Utilities Crew Chiefs and Utilities Specialists, etc) maintain the sewer system assets and responds to emergency call outs. They implement emergency response plans, mobilize sewer-cleaning trucks, by-pass equipment, generators and maintain the City's sewer infrastructure.

- (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 California Department of Public Health and State Office of Emergency Services (OES)).**

The Utilities Supervisor is responsible for overseeing the reporting process. Utilities Department staff members enter information on spills in the State's CIWQs database; a copy of the spill report is given to Administrative staff, who in turn adds the spill to the required spreadsheets. The Utilities Director reviews the draft with the Utilities Supervisor. Consideration is given to volume calculations and vacuum operations, cause of spill, timeliness of response, and any other appropriate or required data. After review and revisions are completed, the report is certified on the database and copies are transmitted to the appropriate agencies. Normal procedure has always been for the City to report all spills regardless of size and whether or not the spill reaches waters of the State. The City believes in keeping the reporting agencies and the public fully informed.

As a first priority during a sewer spill, City staff (typically the Utilities Wastewater Supervisor) notifies the appropriate agencies by phone of a SSO instead of depending on the report as a means of notification.

(III) Legal Authority.

The City must demonstrate, through sanitary sewer 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.*
- (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 City.*
- (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.*

The City complies with the legal authority requirements of the WDR. The City's legal authorities are contained in the following documents:

- City of Newport Beach Municipal Code
- City of Newport Beach Standard Drawings and Standard Specifications
- Standard Specifications for Public Works Construction (Greenbook)

(a) Prevent illicit discharges into its sanitary sewer system

The City has the power to install sewers and enact regulations related thereto, including the prohibition of private sewer systems and requiring all inhabited property to be connected to City sewers. A permit from the City is required to connect to, use, or maintain a connection to the City's sewer facilities. Any person, firm or corporation that connects or discharges to City's wastewater system without a valid permit are enforced through the City's Code Enforcement. In the Newport Beach, illegal connections are usually connections to the sewer system by property owners who have drainage problems due to flat areas and low spots and who solve those problems by draining those areas to an inlet that is connected to the sewer system. When instances of these illegal connections are found, the

property owner is required to immediately remove the connection through a code enforcement process.

The City has established a long-range financial plan to ensure capital replacement of the wastewater system. (2017 Sewer Rate Study)

The current Title 14 of the Municipal Code regulates sewer construction. All sewer construction must be in accordance with City standards (Section 14.24). The inspection requirements by City staff are provided in Chapter 14.04.120.

The City continues its video inspection (CCTV) of all sewer mains in the system. The results of the video inspection will show areas of sewer line deficiencies including illicit connections and infiltration into the lines.

Legally controlling inflow encompasses controlling the major sources of inflow: illegal connections, infiltration through cracked and damaged pipelines and submerged or flooded streets causing water to enter the "pick" holes in manhole covers. Illegal connections are usually connections to the sewer system by property owners who have drainage problems due to flat areas and low spots and who solve those problems by draining those areas to an inlet that is connected to the sewer system. When instances of these illegal connections are found, the homeowner is required to immediately remove the connection. The City's sewer permit issuance procedure is supported by ordinance and any illegal connections are subject to citations.

By using the CCTV, the City is able to proactively look for infiltration of roots and cracks in sewer pipelines. To address the hazard of submerged or flooded streets, the City looked at the option of using watertight manhole covers but it was dismissed because watertight manhole covers are bolted down and become hard to remove during nighttime emergencies and prevent the discharge of concrete damaging gasses.

(b) Require that sewers and connections be properly designed and constructed;

The City has its Standard Plans and Specifications for the Construction of Sanitary Sewers, which insures the sewer lines and connections are properly designed and constructed. The City's specifications by reference incorporate the Standard Specifications for Public Works Construction ("The Greenbook"), which also helps insure proper design and construction of sewer facilities. The City provides continuous inspection during the installation procedure to insure the proper construction practices are followed. The City also requires post construction CCTV to additional insure proper construction.

The Public Works Department has five city inspectors and one contracted inspector, each with numerous years of experience working for the City. The Utilities Department also has one inspector with dedicated time towards permit inspection of Utilities. All of the City's inspectors are trained and experienced in pipeline and pump station construction. They all attend training classes and educational seminars to stay familiar with advancements in the industry. The inspectors maintain copies of the City's Design Criteria, Standard Special Provisions and Standard Drawings for Public Works Construction, Standard Specifications for Public Works Construction, Inspection Manual, and the Work Area Traffic Control Manual (WATCH), on the job at all times.

(c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;

The City requires all new properties and existing properties that redevelop to install a sewer cleanout at the property line (Municipal Code Section 14.24.020). These cleanouts are required at the time Building Permits are issued. This cleanout provides access City for maintenance, inspection and maintenance of the public portion of the lateral. The cleanouts are

installed and inspected according to City Standards and are inputted into the City's GIS system. As needed, the public portion of the laterals are inspected by the City using the cleanout.

(d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and

The City adopted a revised Fats, Oils, and Grease (FOG) Ordinance to reduce and control FOG in the City's sewer system. Grease has been identified as a major cause of sewer line stoppages and spills by the City and by the Orange County Grand Jury who conducted a countywide study. Because of this finding, FOG has been identified as the most important first step in improving sewer system reliability.

Pursuant to Chapter 14, Section 30 of the City of Newport Beach Municipal Code, dedicated to Fats, Oil and Grease Control, the City has the legal authority to control discharges to the sewer system for all sewer facilities located on private property that are outside any structures located on the property. This authority allows the City to require grease control devices for certain food preparation facilities. The City through the use of a contractor inspects all grease interceptors and all food service establishments for compliance on a quarterly and annual basis respectively. The contract FOG inspection program instructs Best Management Practices to restaurants, specifically on how to prevent the discharge of FOGs into the sewer system. This has been a very effective tool for the City. If any food service establishments is not compliant with the Code, they are inspected until compliance is achieved. Code Enforcement is also a tool available to the City.

The legal authority for plumbing fixtures inside a building rests with the City's Community Development Department and County Health Care Authority and new facilities are require compliance with the City Code, specifically the plumbing code and requirements for grease control

devices. City staff continuously works to modify and adopt policies, which will be consistent with the goal of reducing or removing FOG from the City’s sewer system.

(e) Enforce any violation of its sewer ordinances.

The City of Newport Beach has a Municipal Code to enforce violations of its sewer ordinances. The City Attorney has verified our legal authority for inspection and enforcement. Any person, firm, or corporation violating the provisions of Municipal Code are subject to administrative citations, misdemeanor punishments, termination of service, and abatement of conditions on property if necessary.

Table : Legal Authority Checklist

Requirements	NEWPORT BEACH Code Reference
Public Wastewater System	
Ability to prevent illicit discharges into the wastewater collection system	Municipal Code 14.36
Ability to require that sewers and connections be properly designed and constructed.	Municipal Code 14.24
Laterals	
Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the City	Municipal Code 14.24
FOG Source Control	
Ability to limit the discharge of FOG and other debris that may cause blockages.	Municipal Code 14.30
Enforcement	
Ability to enforce any violation of Newport Beach wastewater ordinances.	Municipal Code 10.50

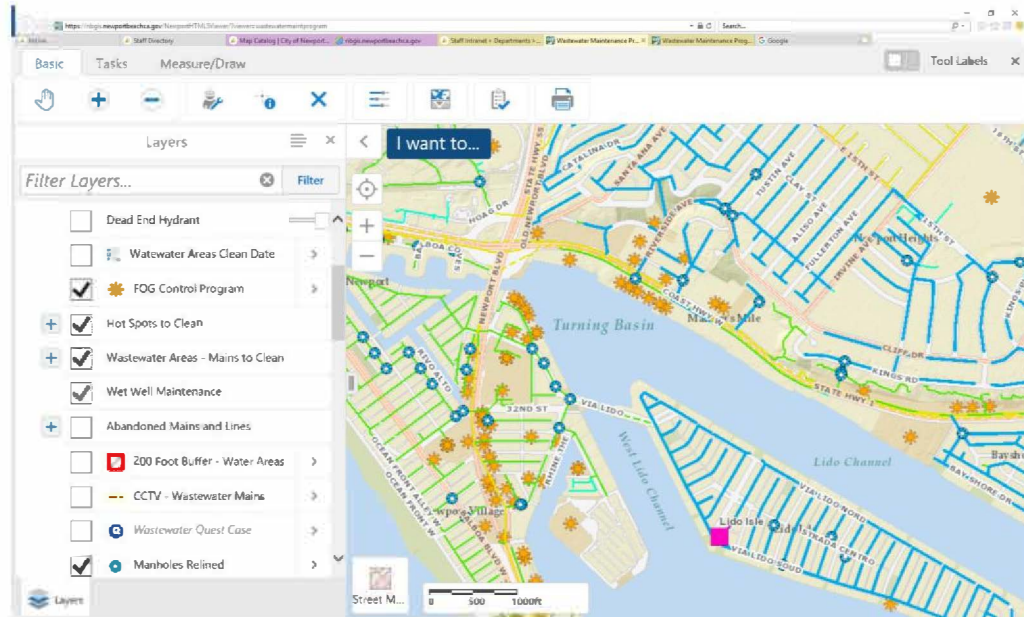
IV Operation and Maintenance Program.

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 storm water 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.
- (c) Develop rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency.
- (d) Provide training on a regular basis for staff in sanitary sewer system operations, maintenance, and require contractors to be appropriately trained; and
- (e) Provide equipment and replacement part inventories, including identification of critical replacement parts.



- (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.**



The City of Newport Beach uses Geographic Information System (GIS) technology to create, maintain, and manage maps and data sets associated with its wastewater collection system. The wastewater system GIS mapping is maintained by City Information Technology Department staff. Pipe inventory data includes ownership, installation year, diameter, length, material, slope, status, record drawing reference, and other information. Manhole inventory data includes ownership, installation year, shaft diameter, depth, invert elevation, rim elevation, record drawing reference, and other information. The focused GIS Wastewater layers page with is available to all appropriate City staff and is continuously updated as new facilities are constructed and pipelines are replaced and updated and as maintenance is performed. In addition to the GIS, the City has a comprehensive Sewer Master Plan which includes hydraulic calculations and is used as a planning tool for the Capital Improvement Program.

The locations of all storm water facilities are also included on separate layers in the GIS. The City recognizes the link between a SSO and its path of travel into the storm drain facility and ultimately to the receiving waters. The City has educated its staff to understand the storm drain network and utilize the network to capture a spill if it has entered the storm drain system.

The City understands the National Pollutant Discharge Elimination System (NPDES) regulations for storm drain system owners, including the provisions of the MS4 Permit. The MS4 Permit contains requirements prohibiting SSOs into the storm drains. The MS4 Permit requires the storm drain system owners to adopt measures that will decrease the possibility of SSOs. The City attends the meetings of the MS4 Permit Co-Permittees in order to coordinate the effort of the storm drain and sewer system owners. Many of the MS4 Permit's municipal obligations (including storm drain system maintenance) are assigned to the City's Storm Drain Division within the Utilities Department.

- (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;**

The City has historically cleaned the sewer system on a regular basis and continues to do so today.



Proactive Sewer Cleaning:

The City of Newport Beach proactively cleans the every gravity sewer pipe segment in the wastewater collection system at least once every 18-months on a systematic cleaning cycle. The 18-month systematic cleaning cycle used for proactive sewer cleaning consists of cleaning groups of pipes, organized by areas. The City uses three different vector cleaning trucks depending on the pipe and location. The variety of trucks gives the City the respond and perform maintenance in small tight alleys and easement areas. Crews also use root cutting nozzles and root foaming products to control roots. The City has identified tree roots in conjunction with grease as the primary cause of spills in the City. All maintenance documentation is uploaded to the City’s GIS system and the electronic “Quest” service and work order request system. A low-tech color-coded area map is also used which shows the date of the last cleaning for the entire 18 month City-wide cleaning schedule. The more vigilant the City is in taking a proactive stance to maintain the main line sewer pipes, the more likely staff is to prevent problems and find problems or areas of concern that need attention.

High Maintenance Areas and Preventative Maintenance Cleaning:

Areas needing more frequent cleaning – known as “high maintenance areas” – are cleaned as frequently as monthly and quarterly. This preventative maintenance sewer cleaning is utilized for sewer reaches with a known history of one or more maintenance issues such as root intrusion, grease accumulation, or debris deposition. These also include inverted siphons that run under flood control channels and bay crossings or commercial areas with multiple restaurants.

High Maintenance Area cleaning schedules include:

- Airport Area (Monthly)
- High Maintenance Area 1 (Monthly)
- High Maintenance Area 2 (Quarterly)
- Wet Wells (Every 3 Months)
- Traffic Control Areas (Every 6 months)

The City has one hydro truck and two combination hydro-vacuum trucks specifically for spill cleanup, each with a two-person crew. The City also has additional backup combination hydro-vacuum truck available for use from the Storm Drain Division. The City sends out two crews daily, sometimes three based on staff availability. Again, the City has areas of monthly and quarterly cleaning. This proactive and preventative approach helps the City stay informed of all areas of the City, especially the high maintenance areas.

CCTV (Video taping)

The City utilizes in-house and contract services to video-tape (CCTV) sewer lines to monitor the high maintenance areas annually, recent repairs, and also to fulfill the goal of completing video inspections of all sewer pipelines once every 10 years. Continuous inspection and post

construction video inspection of all utilities being installed near sewer lines insures proper protection methods are provided for the sewer lines and lengthens the life expectancy of those lines. After sewer lines are video taped, they are rated on their condition of severity and prioritized as described below.

Pump (Lift) Stations



- In addition to the daily cleaning of the gravity sewer lines by crews, the Wastewater Crews maintain 21 sewer pump stations. A two-person pump crew maintains the pumps and motors for all 21 sewer pump stations. The City uses the recommended pump maintenance schedule for the piping, valves, and other equipment in the station and valve vault provided by the City's consultant Engineers Sales and Service Company (ESSCO) and inspects every pump station at least once per week. ESSCO operates as a primary contact for the City during emergencies. ESSCO have provided this service to the City for the past 45 years as it relates to the equipment at the City's sewer facilities. The City also uses SCADA and communication systems to monitor pump station flow and receive alarms

for dispatching crews. Certain pump stations have emergency power generators on site and emergency pumps and generators are housed by the Utilities Department in the event of a failure.

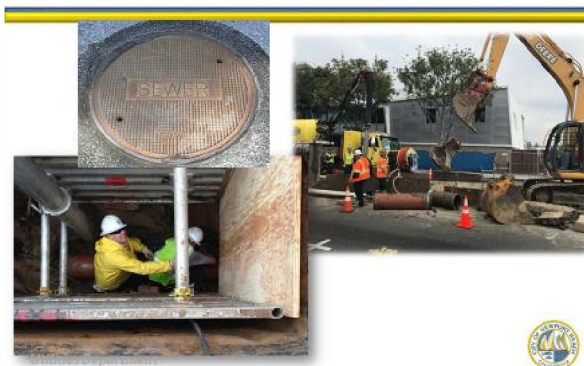
CONSTRUCTION REPAIRS

The City also has an additional Wastewater crew that help maintain the City's sewer infrastructure. This includes a two-person repair crew that primarily installs, repairs or replaces sewer lines, sewer laterals, cleanouts, and manholes.

These crews are also available to assist on the additional hydro-vacuum truck, as needed.

- (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;**

Wastewater



The City's sewer system rehabilitation and replacement planning process consists of systematic inspection and condition assessment of all pipe reaches incorporated into a 30-year Sewer System Master Plan approved in 2010. The Master Plan identifies and prioritizes condition-related repairs, rehabilitation, and replacement projects. The City's process is to evaluate sewer system structural deficiencies identified through sewer inspection and condition assessment to determine if a repair, rehabilitation, or replacement project is required along with an appropriate timeframe for addressing the structural issues identified. When new deficiencies are found, they are either repaired on an emergency basis and placed in the Capital Improvement Program queue based on its severity and priority.

The Public Works Department leads the implementation of the annual Capital Improvement Program. It typically consists of a few pipeline and lateral rehabilitation projects, replacement projects, and upgrade projects. It also usually consists of one pump (lift) station rehabilitation or improvement project. Sufficient funding is available in the Wastewater Enterprise fund and has been secured by the 2017 Sewer Rate Study and rate increases.

The City utilizes in-house and contract services to video-tape (CCTV) sewer lines to monitor the high maintenance areas annually, recent repairs, and also to fulfill the goal of completing video inspections of all sewer pipelines once every 10 years. After sewer lines are video taped, they are rated on their severity condition and prioritized using National Pipeline Assessment Condition Program system standards. As described above, if repairs are needed, they are then put into a repair priority sequence.

- (d) **Provide training on a regular basis for staff in sanitary system operations and maintenance, and require contractors to be appropriately trained; and**



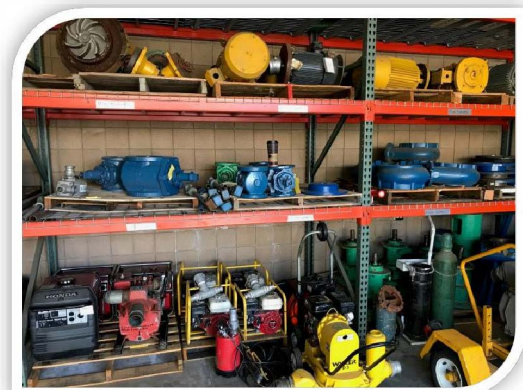
The City uses a combination of on-the-job training, conferences, seminars, and other training opportunities to provide technical training for its wastewater collection system staff. The Department maintains a budget for annual training consistent with the requirements placed on the City by the State Water Resources Control Board in the Statewide General Discharge Requirements for Sanitary Sewer Systems. This training ensures that the Wastewater Collection Section staff maintain their California Water Environment Association (CWEA) certifications and also provides the opportunity to achieve advanced competency in the profession.

In addition to technical training provided by outside resources, the City provides in-house technical training for equipment and collection system operations and maintenance. The focus on in-house training is hands-on training at a work site. All employees receive thorough training on the Department's SSMP, their roles and the roles of others. The Department conducts table top exercises to reinforce this training. All employees are

required to keep relevant portions of the SSMP with them at all appropriate times.

The City requires all Wastewater personnel to have, at a minimum, Grade-1 certification provided by the CWEA. The City requires all Wastewater staff that cross-trains within our Maintenance & Repair (M&R) division or chooses to take the after-hours duty to maintain a California Department of Health Services ("DOHS") Grade D1 (WDO Certificate.) The pump crew chief and several other staff have formalized training in the repair and maintenance of the pumps. City staff is fully trained and capable of making any repairs and responding to any and all emergencies due to the cross training between the divisions. Currently the majority of the Wastewater Division employees are certified at higher than Grade 1 Collections. Wastewater employees completed confined space and trench trainings, as well as certified CPR classes. The City also has three emergency on-call contractors under contract who specialize in wastewater, are appropriately trained and are available to respond to any needed emergency.

- (e) **Provide equipment and replacement part inventories, including identification of critical replacement parts.**



For the City, keeping critical replacement parts available encompasses stocking spare pumps that can be used as replacements while pumps are serviced or replaced. The City attempts to use the same model pumps in as many stations as possible to simplify maintenance and replacement. Twice yearly, staff inventories all piping supplies (VCP, & PVC pipe, fittings & couplings), all main line sewer cleaning supplies (degreasers, root cutters & saws, high pressure hoses, etc.), and pump station replacement parts (glands, check valves & plug valves.)

The City has all the necessary equipment to work on sewer line maintenance and repairs or pump station maintenance and repairs. In addition to small tools, the City has a full fleet of equipment at its disposal. The City also has mutual aid arrangements with neighboring waste water cities and agencies.

V Design and Performance Provisions:

- (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.*

- (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**

The City's standards for the proper installation and inspection of sewer lines are also discussed in Section (III) (b) above.

The City's Utilities, Public Works and Community Development Departments require all new or rehabilitated sewer installations be tested and inspected pursuant to the Municipal Code, the City's standard plans and a permit is required for such connections. The primary design and

performance standards the City's uses in design and installations of new sewer systems are:

- *City of Newport Beach Municipal Code*
- *City of Newport Beach Standard Drawings and Standard Specifications*
- *CIP project specific Special Provisions and Technical Specifications.*
- *Standard Specifications for Public Works Construction (Greenbook)*

The standards listed above outline construction specifications for installing new wastewater systems, pump stations, and other appurtenances; and for rehabilitation and repair of existing wastewater systems. Design criteria include specifications for items such as pipe materials, minimum sizes, minimum cover, strength, minimum slope, trenching and backfill, structure standards, and other related provisions. All new construction, rehabilitation, or repair of the sanitary sewer system adheres to these standards. In addition, the City will use additional written specifications known as Special Provisions and Technical Specifications for specialized construction or projects.

Additionally, the City has standardized its use of materials in the pumping stations for ease of maintenance and replacement. This includes the pumps, liquid level indicators, remote terminal units (RTU's), valves, piping, and radios.

The City uses "no-dig" pipeline rehabilitation as often as possible. The City considers no-dig technology an important tool in pipeline rehabilitation as systems reach their life expectancy. Another important tool used by the Department is vacuum excavation. The City still utilizes the standard method of pipeline removal and replacement in conjunction with new pipeline re-lining technologies.

(b) Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

The City's standard public works contract provides that work is not placed into service and accepted by the City until inspection and testing is completed. The City provides continuous inspection during the construction of sewer facilities and believes that proper installation is the key element to insure proper operation and maximum life expectancy. City inspectors use the Greenbook Inspection Manual for reference. Experience and training also allow them to provide excellent observation of contractors' work. With regard to testing sewer lines, the City uses the Greenbook recommended air-testing and video inspection procedures on all new main lines and video inspects sewer lines after they are constructed.

(VI) Overflow Emergency Response Plan:

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 of all SSOs*
- (d) Procedures to ensure that appropriate staff and contractor personnel follow the Emergency Response Plan and are appropriately trained;*
- (e) Procedures to address emergency operations, such as traffic and crowd control and other necessary emergency activities; and*
- (f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of wastewater*

(a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;

The City's goals with respect to responding to SSOs are to:

- *Work safely;*
- *Respond quickly to minimize the volume of the SSO;*
- *Eliminate the cause of the SSO;*
- *Contain the spilled wastewater to the extent feasible;*
- *Prevent sewage system overflows or leaks from entering the storm drain system or receiving waters to the maximum extent practicable;*
- *Minimize public contact with the spilled wastewater;*
- *Mitigate the impact of the SSO; and*
- *Meet the regulatory reporting requirements.*

Sewer service calls are high priority events that demand a prompt response to the location of the problem. Upon notification of a potential sewer overflow, the City's Duty Responder shall be dispatched onsite within 30 minutes. In the case of an overflow, the City will dispatch the appropriate crews to investigate, identify the cause, and provide appropriate action to minimize the effects of the overflow on public health and quality of surface waters.

Normal Work Hours: Utilities Department (949) 644-3011

The normal working hours for Utilities Department staff and for answering emergency calls is from 7:00 am to 4:30 pm Monday through Thursday and 7:00 am to 3:30 pm every Friday. When a report of an SSO is made, the office staff takes the information from the caller and communicates this information to Wastewater field crew staff and to the Wastewater Supervisor (or to the person in charge of the Wastewater Maintenance Division when the superintendent is on leave.) The wastewater field crew staff and the Wastewater Supervisor (or the person in charge) will report to the site to assess the situation and take appropriate action.

After Hours: Police Department's Dispatch (949) 644-3717

Outside of regular business hours, all emergency calls go through the Police Department's Dispatcher desk. After hours, the emergency standby duty personnel will be reached by PD Dispatch. Emergency stand-by duty personnel are on-call after hours and carry a City pager and City cell phone for ease of access by the Police Department after hours. Duty personnel have equipment and tools in duty truck to respond to SSO's

Duty staff will perform initial assessment either through phone call interview or initial site assessment. If upon arrival or in route to the scene of the SSO and duty staff determines the SSO to be in a City sewer main, staff will respond or coordinate a response with the City Vector trucks and take appropriate action. If there is a sewer alarm from one of the sewer pumping stations, Duty and a separate Water Production duty staff will receive the alarm via pager, cellular phone and email. Using the City's SCADA system, staff can assess the situation quickly.

The City's afterhours approach to sewer overflow response is to include employees with different skill sets on the call out list enabling the City to respond quickly and effectively to a variety of emergencies involving sewer pipelines or sewer pump stations.

(b) A program to ensure an appropriate response to all overflows;

City policy is to respond to all spills within the city – and even provide mutual aid outside the City limits – whether on public or private property and to take all steps possible to prevent the spills from reaching the storm drains, flood control channels, or waters of the State, all in accordance with the waste discharge requirements. Section (II) Organization of this document details the lines of authority and responsibilities of City personnel during an emergency. Since Utilities Department staff cross-

train between Wastewater and Water Maintenance & Repair, there are plenty of trained and qualified staff to assist at any time with SSOs.

Typical Response Steps:

- Identify and assess the affected area and extent of spill. If possible, take photographs to document the extent of the spill.
- Use best judgment to determine whether to proceed immediately with blockage removal versus containment. The guidance for this decision is:
 - *Small spills – proceed with immediate containment measures near the appearance point followed by blockage removal.*
 - *Moderate or large spill where containment is anticipated to be simple – proceed with immediate containment measures near the appearance point followed by blockage removal.*
 - *Moderate or large spills where containment is anticipated to be difficult – proceed with clearing the blockage; however, call for additional assistance immediately to focus on implementing containment measures.*
- Restore Flow using the appropriate cleaning tools; set up downstream of the blockage and hydro clean upstream from a clear manhole. Attempt to remove the blockage from the system and observe the flows to ensure that the blockage does not recur downstream.
 - *If the blockage cannot be cleared within a reasonable time (15 minutes), or the sewer requires construction repairs to restore flow, then initiate additional containment measures and/or bypass pumping.*
 - *If assistance is required, contact other employees, contractors, and equipment suppliers.*
- Initiate Spill Containment Measures: The responding crew should attempt to contain as much of the spilled sewage as possible using the following steps:
 - *Determine the immediate destination of the overflowing sewage.*

- *Implement immediate containment measures consisting of plugging storm drains using sandbags, plastic sheeting, and/or other dam construction material to contain the spill, whenever appropriate.*
 - *Additional containment measures include containing/directing the spilled sewage using dike/dam, sandbags, or earthen berms in landscaped or undeveloped areas.*
 - *Pump around the blockage/pipe failure to convey the wastewater to the nearest downstream manhole or facility.*
 - *If the spill is caused by a sewer lateral, City staff may shut off the water supply to that property when the wastewater endangers the public health.*
- Recovery and Clean Up: The recovery and clean up phase begins when the flow has been restored and the spilled sewage has been contained to the extent possible. The SSO recovery and clean up procedures include the steps below:
- *Estimate the Volume of Spilled Sewage: Use the State methods to estimate the volume of the spilled sewage. If possible, utilize available information such as pump station run times and SCADA data to support or validate volume estimates. Document the estimate using photos of the SSO site before and during the recovery operation*
 - *Recovery of Spilled Sewage: Vacuum up spilled sewage using the hydro/combo unit or pump the spilled sewage and any water used to flush the area and discharge it back into the wastewater collection system*
 - *Clean Up and Disinfection: Implement clean up and disinfection procedures to reduce the potential for human health issues and adverse environmental impacts that are associated with an SSO event. Where clean-up is beyond the resources or capabilities of staff, the City may use a contractor to support clean-up operations.*
 - *Hard Surface Areas: Take reasonable steps to contain and vacuum up the wastewater and return it to the wastewater collection system. Collect all signs of sewage solids and sewage-related material either by hand or with the use of rakes and brooms. Wash*

down the affected area with high pressure water using nozzles on provided on the hydro/combo unit and vacuum the wash water utilizing the hydro/combo unit. Allow area to dry.

- *Storm Drain System: If sewage has reached the storm drain system, the hydro/combo unit should be used to vacuum/pump out the catch basin. Flush the storm drain system with wash water and capture all residual wash water at a point of containment downstream. In the event that an overflow occurs at night, inspect the location early on the following morning. The operator should look for any signs of sewage solids and sewage-related material that may warrant additional cleanup activities.*

- (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:**

The City's policy is to report all spills, regardless of size, to the Regional Board, the Department of Public Health, and Cal EMA, whether on public or private property, even if the spill is completely contained. The City believes in full disclosure of its operations and performance. The City adopted and uses the State's spill reporting program.

Oral Notification:

As a first priority during a Category 1 sewer spill, the Wastewater Supervisor or designated response staff will immediately notify the California Office of Emergency Services (Cal-OES) (not later than two hours after becoming aware of the discharge) by phone that a spill has occurred. The Wastewater Supervisor will then notify Orange County Health Care Agency (OCHCA), Orange County Public Works and the Santa Ana Regional Water Quality Control Board. The City notifies

OCHCA by phone on all private property spills that are not fully recoverable immediately upon discovery.

Category 1 sewer spills are spills from City's sanitary sewer system of any volume that:

- a. Reach surface water and/or reach a drainage channel tributary to a surface water;
- b. Reach a Municipal Separate Storm Water System (MS4) and is not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly.

Each of the following will be notified in the case of a Category 1 sewage spill:

Cal-OES (800) 852-7550 (within two hours after being notified of the spill)
OCHCA (714) 628-7008
RWCQB (951) 782-4130 Fax: (951) 781-6288
OCPW (877) 897-7455

Category 2 spills are discharges of untreated or partially treated wastewater of equal or greater than 1,000 gallons that did not reach surface water, a drainage channel, or a MS4 unless the entire SSO discharged to the storm drain system is fully recovered and disposed of properly.

Category 3 spills are all other discharges of sewage that result from a failure in the Agency's sanitary sewer system.

Written Reports:

For Category 1 spills, the City will adhere to the following written procedures:

- Within 24 hours of notification of a Category 1 spill, the City will certify to the appropriate RWQCB, by phone or with a follow up fax, that Cal-OES and OCHCA were notified.
- Within 3 business days of being notified of the spill event, the City will certify the initial report using the CIWQS online SSO Reporting System

- Within 15 calendar days of the conclusion of the SSO response and remediation, the City will certify the final report using the CIWQS online SSO Reporting System.
- The City will update CIWQS and re-certify the SSO report as new or changed information becomes available. The updates will be submitted as soon as new information is verified. All updated reports will be certified.

For Category 2 spills, The City will adhere to the following written procedures:

- Within 3 business days of being notified of the spill event, The City will certify the initial report using the CIWQS online SSO Reporting System.
- Within 15 calendar days of the conclusion of the SSO response and remediation, the City will certify the final report using the CIWQS online SSO Reporting System.
- The City will update CIWQS and re-certify the SSO report as new or changed information becomes available. The updates will be submitted as soon as new information is verified. All updated reports will be certified.

For Category 3 spills, the City will adhere to the following written procedures:

- Within 30 calendar days after the end of the calendar month in which the SSO occurred, the City will submit a certified report using the Online SSO Reporting System. The report will include the information to meet the WDR requirements.

(d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;

All Wastewater Division personnel, who have a role in responding to, reporting, and/or mitigating a wastewater collection system overflow receive annual training. The training includes emergency operations, such as traffic and crowd control, procedures for volume estimation and SSO start time determinations. Periodic field drills and exercises are conducted to assure the Wastewater Division personnel practice under actual conditions.

The role of each person during an emergency has been established. The City has pre-established responsibilities for administrative staff members (EOC, DOC) that work concurrently with the field crews to provide an efficient response. Field crewmembers are required to keep copies of the Sewer System Management Plan and the spill reporting form in their vehicle.

If the emergency is during normal working hours, field crews and the supervisor will work appropriately to handle the emergency. City Staff is positioned as follows:

- The Wastewater Utilities Supervisor is in the field, documenting the situation with pictures and verbal reports back to the administrative staff in the office. The Utilities Supervisor will verbally report any sewer spills to the required agencies and as soon as possible file the written report.
- The Wastewater Utilities Supervisor is in the field providing direction to the field crews and will continuously inform the Utilities Manager and/or Director to insure the correct actions are taken.

(e) Procedures to address emergency operations, such as traffic and crowd control and other necessary emergency activities; and

The Water and Wastewater field crews respond to all emergencies, and if needed, any other City department like the Police Department for crowd and traffic control, Field Maintenance Division for additional signage, delineators, barricades, or extra equipment, and the Traffic Division of the Public Works Department who can develop and supervise the implementation of traffic control plans.

(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.

The City crews are required to use mats, sandbags, dirt berms or any other necessary means to block the catch basin inlets to the storm drains and use the vacuum trucks or a trailer-mounted vacuum unit to vacuum up spills and wash down water.

The City has minimized the impact of sewer spills, by washing the area down with water, capturing the wash water, and removing the captured wash water with a vacuum truck. The Orange County Health Care Agency has requested that only fresh water be used because disinfectants pose their own problems.

The City relies on the California Department of Public Health (CDPH) for monitoring water quality and posting beach closures. All spills are reported immediately to the CDPH office and the Regional Board.

Routine preventive operation and maintenance activities by staff and contractors include scheduling regular maintenance and cleaning of the collection system with the known problem areas receiving more frequent cleaning and maintenance. The preventative Maintenance (PM) program should have a system of tracking work orders and assessing the success of the PM program.

The City uses work orders and verbal requests, followed up by a work order, with which field crews respond with a written response. The work order is then entered into the database for easy retrieval and reports. All department staff receives one hour of training a month the topics incorporate safety, program and project updates, and/or new policy mandates. All staff members are urged to discuss ideas to improve programs or daily work tasks.

The City cleans approximately 30,000 feet of high maintenance areas on monthly runs and approximately 20,000 feet on the quarterly runs. In addition, the City cleans all of its wet wells quarterly to complete the cleaning of the City's sewer infrastructure.

VII FOG Control Program.

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;

The City has already adopted a grease control ordinance and a restaurant inspection program and finds it does have the authority to adopt and implement certain grease control regulations on public and private property. Utilities Department worked in conjunction with the three agencies inside the city's boundary that have building departments - the City of Costa Mesa, the City of Newport Beach, and the Orange County Sanitation District- to adopt common grease control regulations. Inspection and enforcement activities are recognized as key components to a successful program. See section IIIId for more information.

(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;

The City disposes of all of its wastewater solids waste including FOG at the Orange County Sanitation District.

- (c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;**

The City's Municipal Code, Chapter 14, Section 30 gives the City the authority to prohibit discharges to the City's sewer system.

- (d) Requirements to install grease removal devices (such as interceptors), design standards for removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;**

The City's Municipal Code Chapter 14, gives the authority to require the installation of grease removal devices, per the Plumbing Code, which is enforced by the City's Plan Checkers and Inspectors. Utilities Department has the ability to implement design standards and the City has a contract inspector who inspects all FSE's on a regular basis for maintenance and BMP requirements and provides the City with a spreadsheet of his findings. See section III d for more information.

- (e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG Ordinance;**

The City's Municipal Code Chapter 14 gives City staff the authority to inspect grease-producing facilities. Working with our Code Enforcement staff the City has the enforcement authority to write Notices of Violation and citations (14.04.130 – Enforcement of Violations). See Section III d for more information.

- (f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and**

The City has a list of high maintenance areas that it cleans and monitors on a monthly basis, in addition to the regular cleaning schedules utilized by staff.

- (g) Development and implementation of source control measures for all sources of FOG discharges to the sanitary sewer system for each section identified in (f) above.**

Staff works with contracted City's FSE Inspector to reduce the grease levels within FSE's through the use of BMPs. Staff also uses CCTV to look at the source of these problems to make the necessary repairs to eliminate FOG discharge locations from the list. This is an on-going process that personnel works diligently on so that areas of high maintenance can be moved to regular cleaning schedules or be removed all together.

VIII System Evaluation and Capacity Assurance Plan.

The enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key 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.**

The City has completed its Sewer Master Plan, which incorporates a hydraulic analysis of every line in the system and plans for increasing capacity for those lines found unable to handle future master planned flows. The current system capacity is able to handle, without problem, the current dry weather and wet weather peak sewer flows. The Sewer Master Plan was prepared and reviewed by AKM Consulting Engineers in 2010.

As documented by the City's Water Master Plan and water production records, water use and sewer use has been on a 20-year downward trend.

The Sewer Master Plan contains a list of each project identified as necessary to increase the capacity of portions of the system. No improvements are required in the short term and long-term improvements will be planned according to development and metered sewer flows. During the design of each project, alternative designs are considered.

- (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**

The City Engineer utilizes professional judgement and industry standard design criteria when evaluating development projects and the City's Capital Improvement Projects. The City's Standard Plan and Specifications are also used.

- (c) Capacity Enhancement Measures: The steps needed to establish a short-term 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 in redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.**

The City has a Sewer Master Plan, and the 5-year Capital Improvement Program to adequately address the sewer system needs. With the 2017 Sewer Rate Study, there is sufficient dedicated Capital funding for the specified projects.

- (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.**

The City's Sewer Master Plan includes a schedule for CIP, and is tracked by the Public Works Department as part of the Sewer Master Plan.

IX Monitoring, Measurement and Program Modifications.

- (a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;**

Staff maintains cleaning logs and CCTV documentation for the system. Areas that need prioritizing into a future CIP, point repair or regular cleaning or service change are programmed into the Capital Improvement Program. The City maintains over the required five years for all documentation including CCTV.

- (b) Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP;**

The SSMP will be reviewed on a regular basis to insure all the provisions are implemented and the effectiveness discussed at the quarterly and monthly safety and training meetings as needed. All monthly staff meetings include field crews, administrative staff, and management staff.

- (c) Assess the success of the preventative maintenance program;**

The success of the preventative maintenance program is regularly reviewed by the reduction in spills and the elimination of high maintenance areas. Staff members continually look for ways to improve the efficiency of maintaining the City's sewer system.

- (d) Update program elements, as appropriate, based on monitoring or performance evaluations; and**

The SSMP and its elements will be updated in accordance with the results of monitoring and staff recommendations. For instance, if the study of enzymes and bacteria progresses and the effectiveness determined successful enough to be used with BMP's and in-lieu of or in-conjunction with a grease control device for grease mitigation and control. The Sewer

System Management Plan and City policies will be revised as needed to facilitate the results of the study and the needs of the City's infrastructure. Performance evaluations are on-going because the daily operations of the City includes all the elements of the program.

(e) Identify and illustrate SSO trends, including frequency, location, and volume.

The Utilities Supervisor keeps a report of all spills and maintains tracking information to see the trends of spills based on location and type of spill. The report includes location and volume.

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

The City performs the required internal audits evaluating its SSMP and its compliance with the WDR as required. Staff update this SSMP document Regularly and bring the significant changes back for Council approval as required or needed. The City has completed audits starting in 2011 and has continued annually especially to note changes to any procedures or operations. These have been incorporated into this current SSMP.

XI Communication Program.

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 City has developed the following Communications Program to ensure the public is aware on the development, implementation and performance of the

SSMP. The Program provides the public the opportunity to comment on the SSMP and the implementation of the Plan.

- Utilities Department participates in City Newsletters and the City Manager's newsletter.
- Utilities Department staff regularly presents information at City Committee's such as the Water Quality/Coastal Tidelands Committee. Staff also regularly present information at townhall meetings, HOA's meetings, Chamber of Commerce meetings and City and Community events and parades.
- This SSMP will be presented to the City Council during one of their standard regular meetings and is made available to the public.
- The SSMP document is available on City's website for the public to review and comment.
- Sewer overflow performance information is available to the public on the State Water Resources Control Board (SWRCB) California Integrated Water Quality System (CIWQS).