

Sewer System Management Plan (SSMP) Audit

(May 2021 to May 2024)



CITY OF
NEWPORT BEACH

Prepared by:



Sanitary Sewer Collection System

WDID=8SSO10590

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REVIEWED AND APPROVED BY

Casey Parks,
Utilities Superintendent
Utilities Department
City of Newport Beach

Casey Parks

Date Signed: 11/14/2024

Signature indicates system operators were provided opportunity to comment on the Audit findings¹

¹ Required under Specification 5.4 of the Reissued WDR (see pages 19-20)

CERTIFICATE

— OF COMPLETION —

CITY OF NEWPORT BEACH

Sewer System Management Plan Audit
(May 2021-May 2024)

- *Regulatory review, agency expectations and compliance best practices.*
- *Regional Water Quality Control Board inspector expectations.*
- *Completion of State Water Board Pre-Inspection Questionnaire*
- *Completion of Compliance Evaluation Inspection (CEI).*
- *Findings/Best Practice Recommendations for further improving agency program effectiveness, compliance, and resilience.*



Jim Fischer

James Fischer, PE (NPDES Compliance Inspector)

10/18/24



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October 28, 2024

CITY OF NEWPORT BEACH

Att: Casey Parks, Utilities Superintendent
949 W. 16th Street
Newport Beach, CA 92663

Dear Casey,

We are pleased to present the 2021-2024 Sewer System Management Plan (SSMP) Audit Report for the City of Newport Beach (City) (see Attachment 1).

The SSMP Audit revealed that City is in full compliance with Attachment D-10 of the Sanitary Sewer Collection System [Reissued WDR \(State Water Board, Water Quality Order No. 2022-0103-DWQ\)](#). The Audit also shed light on many existing and successful City best practices and presents additional potential areas to consider for further improvement. When comparing the CITY spill performance metrics with other collection systems in the San Francisco Regional Water Board area and throughout the State, the City performs near the top.

Detailed desktop and field interviews incorporating USEPA/Water Board Compliance Evaluation Inspection (CEI) procedures, including comprehensive interviews with management and field staff were relied upon for generating the Audit findings and best practice recommendations. With completion of the Audit, City becomes one of the few in the State to be comprehensively evaluated under the Reissued WDR ahead of the required deadline.

We look forward to supporting the City with ongoing program optimizations to meet and exceed all compliance standards specified in the Reissued WDR.

Sincerely,

A handwritten signature in black ink that reads "Jim Fischer".

James Fischer, P.E.
Principal, Credentialed U.S. EPA NPDES Compliance Inspector

Attachment 1 (2024 Sewer System Management Plan Audit Report)

PART 1 (Executive Summary)

The City of Newport Beach (City) is charged with complying the State Water Resources Control Board (SWRCB) General Reissued Waste Discharge Requirements (WDR) for Sanitary Sewer Systems (“Reissued WDR”, Order No. 2022-0103-DWQ). The Reissued WDR replaced the original 2006 WDR (Order No. 2006-003-DWQ and its Monitoring and Reporting Program, Order No. 2013-0058-EXEC), which became effective on June 5, 2023.

The Reissued WDR requirements are the strictest sewer regulations in the country requiring a proactive approach for operations, maintenance, and management of sanitary sewer collection system to reduce or eliminate sewer spills. Attachment D-10 of the Reissued WDR requires periodic SSMP Audits to be completed by the City at least every three years.

To comply with the SSMP Audit requirements, Fischer Compliance LLC in collaboration with City management completed a Sewer System Management Plan (SSMP) Audit covering May 2021 through May 2024.



This Audit report meets and exceeds the minimum requirements specified in the Reissued WDR (Attachment D-10 and Specifications 5.4), scaled to the size/complexity of the City’s sewer system. This includes evaluating the SSMP implementation and effectiveness, compliance with the Reissued WDR, and identifying deficiencies in addressing ongoing spills.

Regulatory Background

The Reissued WDR requires local public sewer collection system agencies, referred to as “Enrollees,” to develop a Sewer System Management Plan (Sewer System Management Plan). Sewer System Management Plans must be audited (by City staff or outside consultants) at least every three (3) years and updated every 6 years according to the Water Board’s regulatory schedule.

2006 WDR: To provide a consistent, statewide regulatory approach to address sewage spills, the State Water Resources Control Board (State Water Board) adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003 (SSS WDRs), on May 2, 2006. All public agencies that own or operate a sanitary sewer system that is comprised of more than one mile of pipes or sewer lines that convey wastewater to a publicly owned treatment facility were required to apply for coverage under the Order.

2022 WDR: The 2006 WDR was rescinded and replaced with a “Reissued WDR” (Order No. 2022-0103-DWQ), adopted on December 5, 2023 which became effective on 6/5/2023. The Reissued WDR updates many aspects of the 16-year-old Order and includes several new requirements for Sewer System Management Plans.

Detailed SSMP Audit Requirements

This section provides details about the SSMP Audit requirements mandated by the Reissued WDR. An SSMP is a spill reduction/mitigation plan that lays the foundation for how an agency implements its work programs, assesses effectiveness of its maintenance program, and provides resilience to bounce-back from emergencies, upsets, and scrutiny by regulators conducting a Compliance Evaluation Inspection (CE) or formal spill investigation.

The Reissued WDR includes the following specific requirements for completion of SSMP Internal Audits:

Specifications 5.4 (Sewer System Management Plan Audits, page 19):

*“The Enrollee shall conduct an internal audit of its Sewer System Management Plan, and implementation of its Plan, at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the Enrollee’s last required audit period. **Within six months after the end of the required 3-year audit period**, the Legally Responsible Official shall submit an audit report into the online CIWQS Sanitary Sewer System Database per the requirements in section 3.10 (Sewer System Management Plan Audit Reporting Requirements) of Attachment E1 of this General Order. Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff.*

The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills. The Enrollee’s sewer system operators must be involved in completing the audit. At minimum, the audit must:

- *Evaluate the implementation and effectiveness of the Enrollee’s Sewer System Management Plan in preventing spills.*
- *Evaluate the Enrollee’s compliance with this General Order.*
- *Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and*
- *Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.*

The Enrollee shall submit a complete audit report that includes:

- *Audit findings and recommended corrective actions.*
- *A statement that sewer system operators’ input on the audit findings has been considered; and*
- *A proposed schedule for the Enrollee to address the identified deficiencies.”*

Attachment D-10 (Internal Audits, page D-10):

The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order.

SSMP Auditing Procedures

A comprehensive SSMP Audit incorporating procedures developed by Fischer Compliance LLC was completed in October 2024. To complete the 2024 City SSMP Audit, the following key elements were incorporated for the SSMP assessments:

- Interviews with City collection management and field staff including both online and onsite conferences
- Review of the City's Sewer System Management Plan (SSMP)
- Review of City spill reports, system data, and other documentation
- Incorporation of guidelines and recommendations for SSMPs published by the Bay Area Clean Water Agencies (BACWA)² and available to all collection system agencies statewide as an industry standard practice publication on best practices for sanitary sewer operators.

² Available for download at: <https://bacwa.app.box.com/s/cucxst3w2c4fl53jopuyayt6b3u4xjs5/file/1489440015726>

Collection System Information

The City owns and operates a regional sanitary sewer collection system (collection system) serving a population of approximately 85,000. The collection system consists of approximately 197 miles of gravity sewer mains and 5 miles of pressure (“force main”) sewers. Figure 1 below provides a map of the City’s current sanitary sewer system flow schematic including related flow relationships with other tributary collection systems in the Santa Ana Regional Board (Region 8) area.

Figure 1 below provides a map of the City’s service area for its sanitary sewer system.

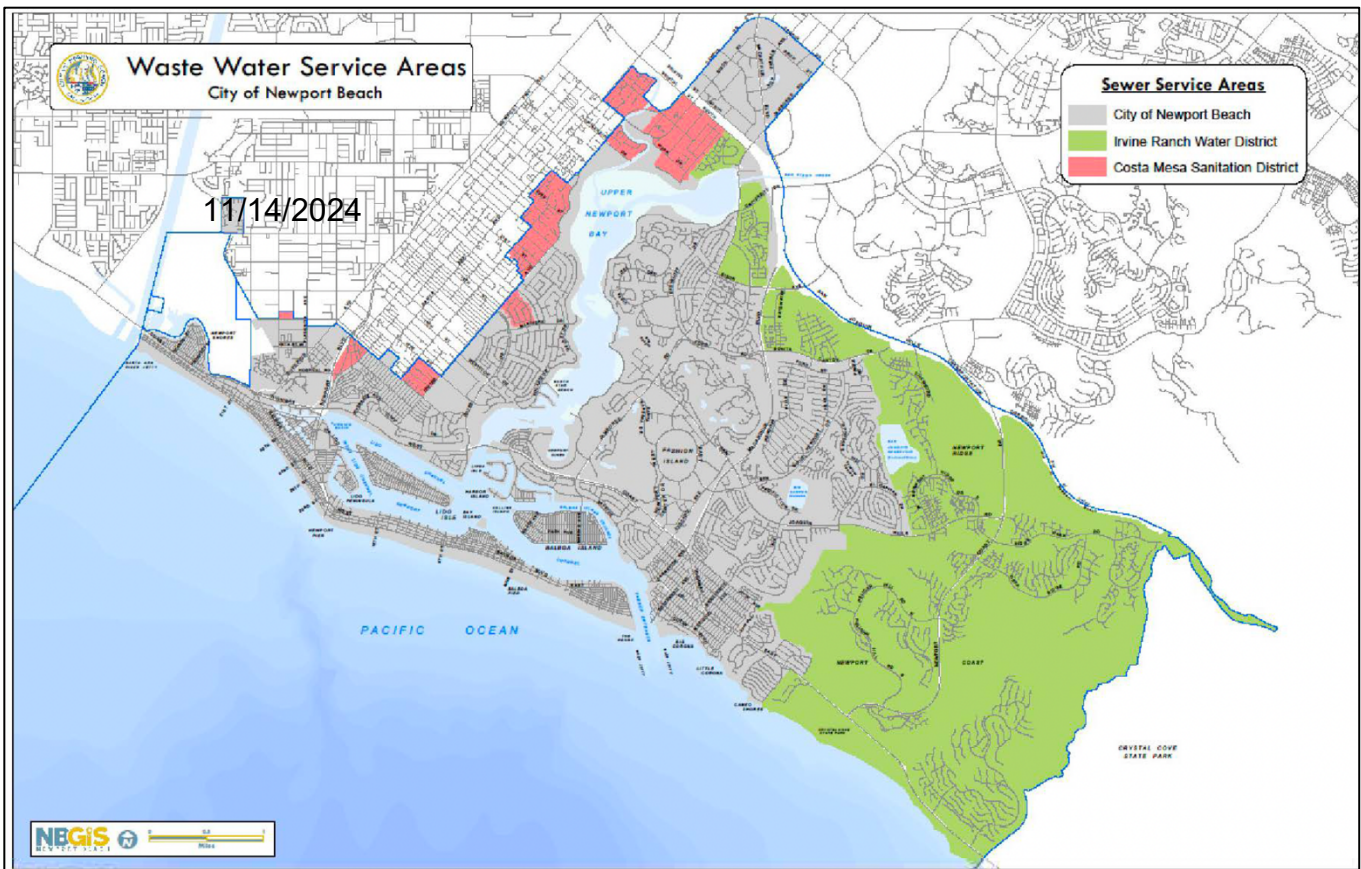


Figure 1 - City sanitary sewer system service area map (2019)

EXECUTIVE SUMMARY

Figure 2 below provides a current Facility At-A-Glance report generated for the City contained in the State Water Board Database (CIWQS)³.

General Information						
Region	Place ID	Place Name	Place Type	Place Address	Place County	
8	256402	Newport Beach City CS	Collection_System	3300 Newport Newport Beach, CA, 92658	Orange	

Related Parties						
Party	Party Type	Party Name	Role	Classification	Relationship Start Date	Relationship End Date
647848	Person	Jonathan Garrett	Is A Data Submitter For		10/28/2024	
638441	Person	Casey Parks	Is Onsite Manager For		03/20/2023	
604696	Person	Patrick Piersall	Is A Data Submitter For		11/27/2019	
554786	Person	david A R Aguirre	Is A Data Submitter For		02/24/2016	
554782	Person	James Auger	Is A Data Submitter For		02/23/2016	02/01/2022
554771	Person	Christopher Newton	Is A Data Submitter For		02/23/2016	11/29/2018
554758	Person	Kiel Wilcox	Is A Data Submitter For		02/22/2016	02/01/2022
530420	Person	Justin Power	Is A Data Submitter For		12/09/2011	07/14/2014
530421	Person	Matt Bullman	Is A Data Submitter For		12/09/2011	02/22/2016
524996	Person	George Murdoch	Is Onsite Manager For		11/01/2010	12/01/2017
454604	Person	Steve Myrter	Is Onsite Manager For		01/16/2008	12/06/2011
359089	Person	Dustin Burnside	Is A Data Submitter For		01/09/2007	12/06/2011
359084	Person	Michael Lynch	Is Onsite Manager For		01/09/2007	
454901	Organization	Newport Beach City	Owner	City Agency	01/08/2007	
86769	Person	Ed Bur	Is Onsite Manager For		03/23/2006	02/22/2016

Total Related Parties: 15

Regulatory Measures									
Reg Measure ID	Reg Measure Type	Region	Program	Order No.	WDID	Effective Date	Expiration Date	Status	Amended?
298938	Enrollee	8	SSOMUNILRG	2022-0103-DWQ	8SSO10590	08/16/2006		Active	N
308697	Co-Permittee	8	WDR	R8-2002-0014	8 303475001	04/26/2002	04/26/2007	Historical	N

Total Reg Measures: 2

Violations							
Violation ID	Occurred Date	Violation Type	(-) Violation Description	Corrective Action	Status	Classification	Source
1134007	08/29/2023	SSOS	Type: Category 1 Spill; Debris-General, Fats, Oil and Grease (FOG) caused 1749 gallons of sewage to spill from Gravity Mainline, Manhole at 3057 Carob St. to Drainage Conveyance System, Unpaved Surface	Inspected Sewer Using CCTV to Determine Cause, Other (specify below). Change this area to a quarterly schedule.	Violation	A	SSO
1134005	07/29/2023	SSOS	Type: Category 1 Spill; Damage by Others Not Related to Collection System Construction/Maintenance caused 526 gallons of sewage to spill from Force Main, Pump Station at Aloha Drive @ Bayside Drive to Surface Water	Repaired Facilities or Replaced Defect. NA	Violation	A	SSO

Report displays most recent five years of violations. Refer to the [Interactive Violation Report](#) for more data.

Total Violations: 2 **Priority Violations: 0**

*Click the "(+/-) Violation Description" link to expand and contract the violation description.
 *As of 5/20/2010, the Water Board's Enforcement Policy requires that all violations be classified as 1, 2 or 3, with class 1 being the highest. Prior to this, violations were simply classified as Yes or No. If a 123 classification has been assigned to a violation that occurred before this date, that classification data will be displayed instead of the Yes/No data.

Violation Types
 SSOS = Sanitary Sewer Overflow/Spill/

Enforcement Actions				
Enf Id	Enf Type	Enf Order No.	Effective Date	Status
Total Enf Actions: 0				

Inspections						
Inspection ID	Inspection Type	Lead Inspector	Actual End Date	Planned	Violations	Attachment
Total Inspections: 0						
Last Inspection: None						

The current report was generated with data as of: 10/31/2024

Figure 2 - City Facility At-A-Glance report (State Water Board Online Database, CIWQS 2024)

³California Integrated Water Quality System (CIWQS), available publicly at the following link:
<https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/CiwqsReportServlet?inCommand=drilldown&reportName=facilityAtAGlance&placeID=630701&reportID=7029229>

City SSMP/Audit Due Dates

This section provides an overview of upcoming due dates for the City to update its SSMP and complete its next SSMP Audit. Figure 4 below displays a summary of the upcoming due dates for the City (5/2/2025 for its 2025 SSMP Update and 11/2/2024 for the next SSMP Audit , 6 months after the end of the required 3-year audit period which ended on 5/2/2024).

Sewer System Management Plan & Audit Required Due Dates Transition from General Order 2006-0003-DWQ to Reissued General Order

Search by Waste Discharge Identification (WDID) Number

Enter your Waste Discharge Identification (WDID) number in the search field to retrieve the required Sewer System Management Plan (SSMP) Update and Audit due dates for your system.

8SSO10590

Show Update/Audit Dates

Sewer System Management Plan & Subsequent Update Due Dates					
System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
Newport Beach City CS	8SSO10590	5/2/2009	5/2/2014	5/2/2019	5/2/2025

Audit Due Dates								
System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
Newport Beach City CS	8SSO10590	5/2/2011	5/2/2013	5/2/2015	5/2/2017	5/2/2019	5/2/2021	5/2/2024

* Per Section 5.5 and Attachment E1, Section 3.11 of the General Order, Plan updates are due within six years after the required due date of the Enrollee's last Plan Update.

** Per Section 5.4 and Attachment E1, Section 3.10 of the General Order, the Audit Report is due within six months after the end of the required 3-year audit period.

Figure 3 - City SSMP Update/Audit Due Dates (SWRCB website)

City Spill Performance

This section provides an overview to showcase City spill performance information, including trends and benchmarks to allow a comparison of the City’s performance against other collection system agencies within the Santa Ana Regional Board (Region 8) Water Board area and State. Numerous data sets and visualizations were created (see Figures 4-8 below and Appendix 2 for more additional detailed data visualizations generated with Microsoft Power BI).

As displayed in many of the visualizations, the City’s spill rates and volumes discharged during the Audit period were consistently lower than many other sanitary sewer system agencies within the Santa Ana Regional Water Board (Region 8) area.

Additional spill performance details noted during the previous SSMP Audit can be found in Appendix 2.

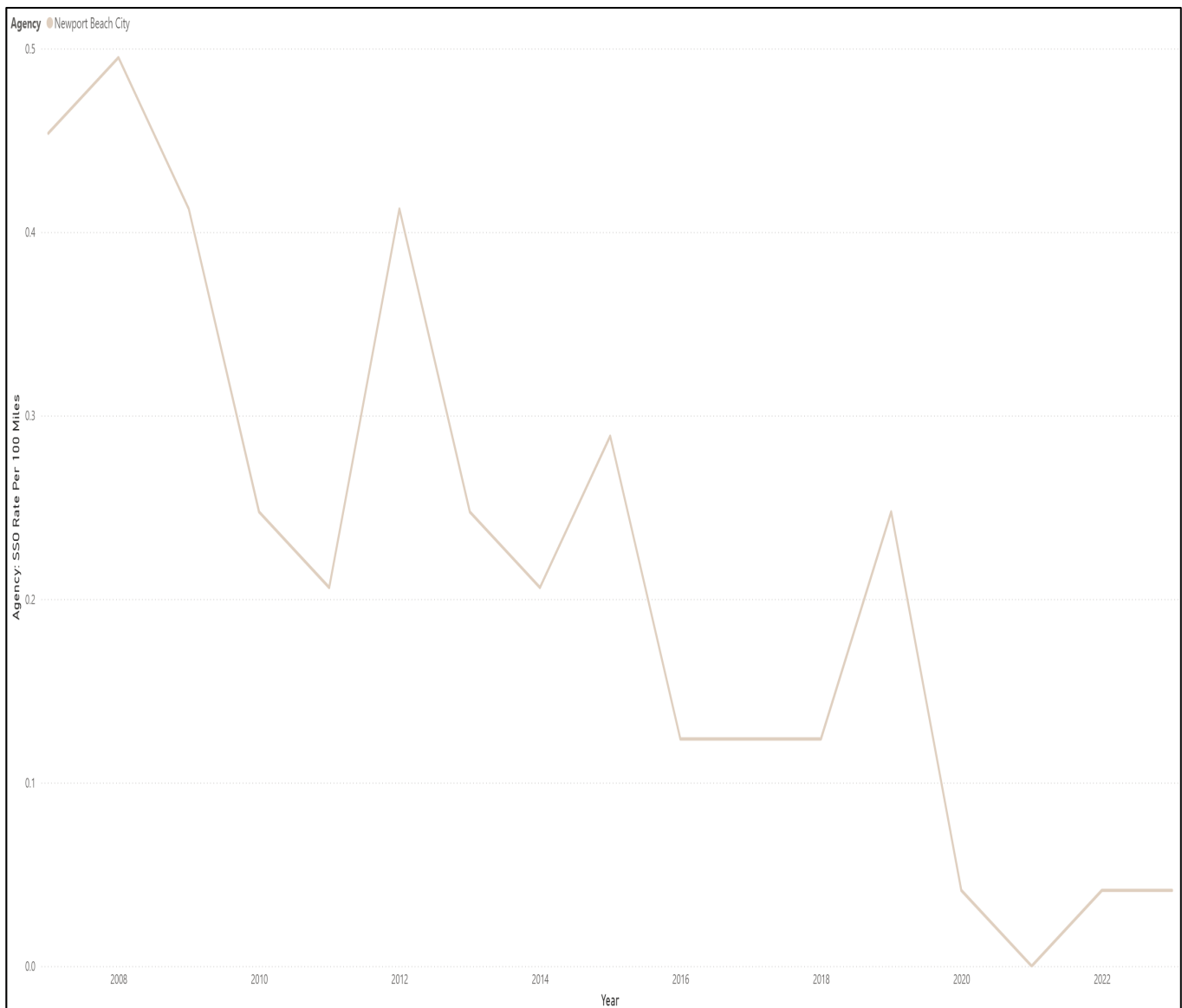


Figure 4 - City spill rates (# of spills/100 miles of sewer), rolling average (2007-2024)

EXECUTIVE SUMMARY

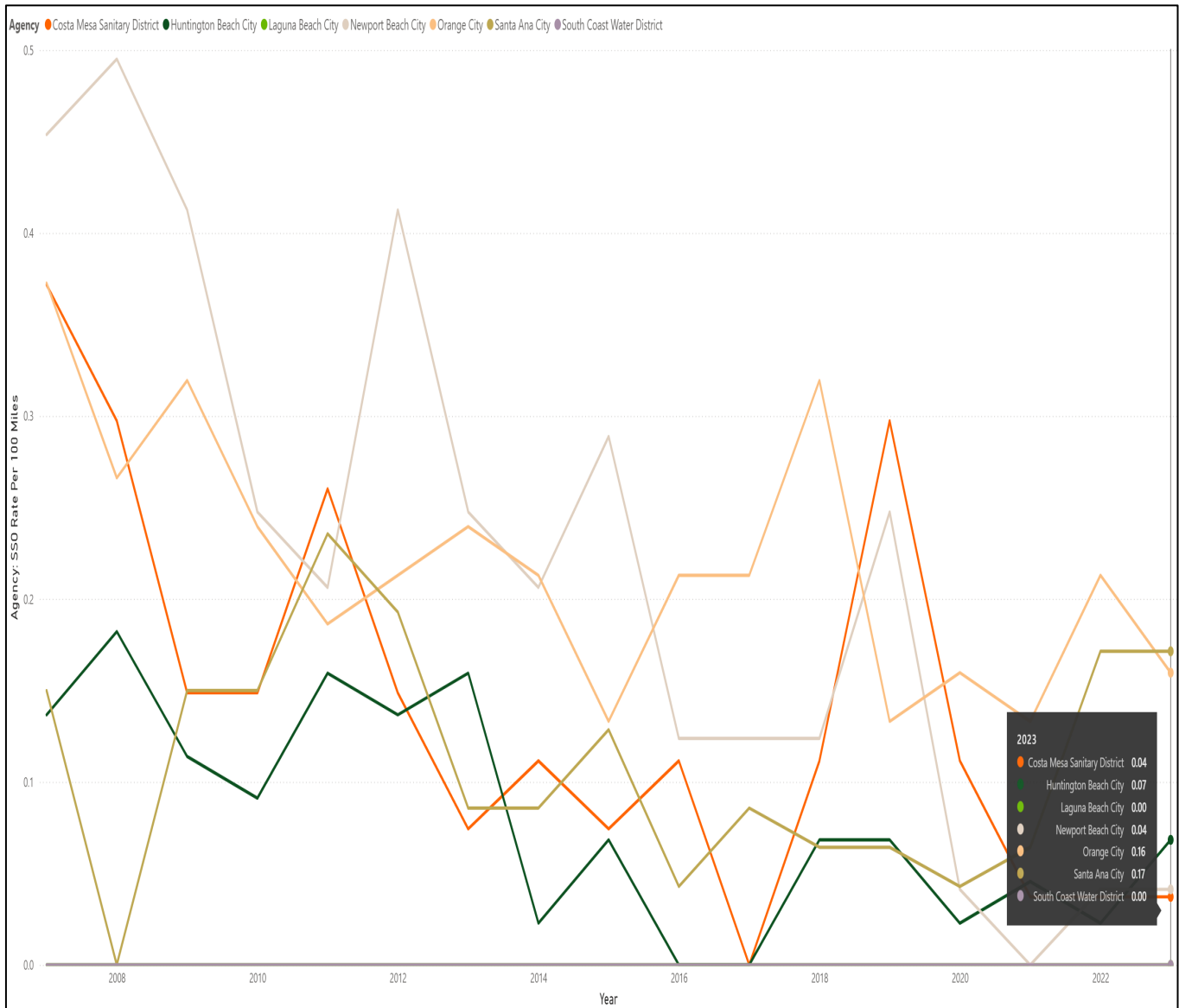


Figure 5 - City Spill Rates (# of spills/100 miles) compared with other agencies during (2007-2024)

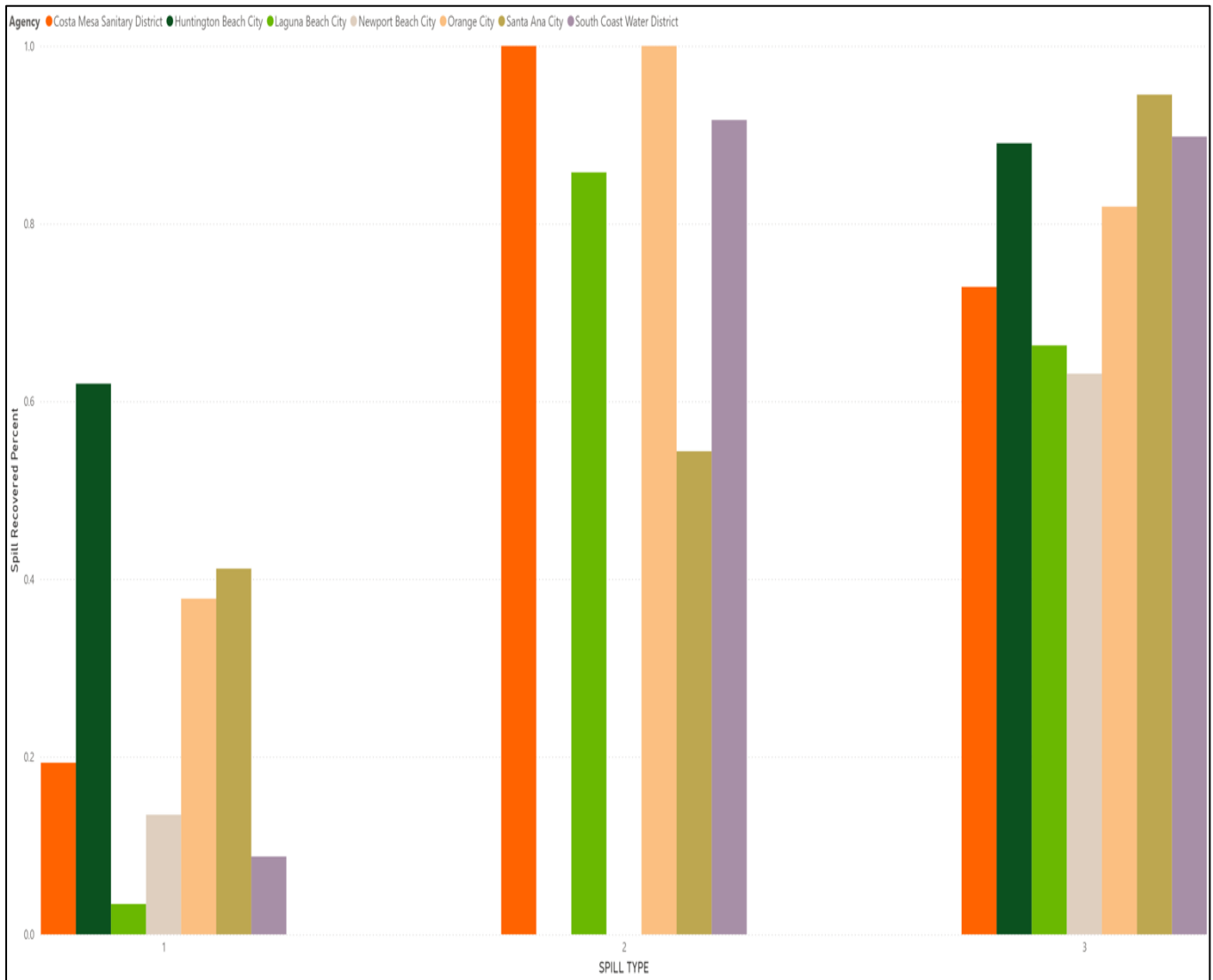


Figure 6 - City spill recovery metrics (Cat 1/2/3 spills) compared with other agencies, 2007-2024

SSMP Audit Findings

This section provides a high-level summary of the SSMP Audit findings (see Tables 2 and 3 below) for incorporation into the City’s 2025 SSMP Update due on or before 5/2/2025.

Table 1: Summary of City SSMP Audit Findings (Reissued WDR, ATTACHMENTS)

SSMP AUDIT FINDINGS (ATTACHMENTS)				
Requirements	Potential Violations?	Areas of Concern?	Audit References	
Att. D-1	Goal & Intro	No	No	None
Att. D-2	Organization	No	No	None
Att. D-3	Legal Authority 11/11/2024	No	No	None
Att. D-4	O/M Program	No	Yes	See WDR Conformance + WDR Recommendations (page 24), WDR Recommendations (pages 25-26)
Att. D-5	Design and Performance	No	No	None
Att. D-6	Spill Emergency Response Plan (SERP)	No	No	None
Att. D-7	Pipe Blockage Control Pgm.	No	No	None
Att. D-8	SECAP	No	No	See WDR Conformance + WDR Recommendations (page 24), WDR Recommendations (pages 25-26)
Att. D-9	Monitoring, Measurement	No	No	None
Att. D-10	Audits	No	No	None
Att. D-11	Communications	No	No	None
Att. E1	Notification, Monitoring, Reporting, Records	No	No	None

Table 2: Summary of SSMP Audit Findings (Reissued WDR, SPECIFICATIONS)

SSMP AUDIT FINDINGS (SPECIFICATIONS)				
Requirements		Potential Violations? ⁴	Areas of Concern? ⁵	Audit References
Spec. 5.1	Designation of LRO	No	Yes	None
Spec. 5.2	SSMP Development, Implementation	No	Yes	See detailed findings below
Spec. 5.3	SSMP Updates	No	No	None
Spec. 5.4	SSMP Audits	No	No	None
Spec. 5.6	System Resilience	No	No	See detailed findings below
Spec. 5.10	Resources	No	No	See detailed findings below
Spec. 5.11	Performance Analysis	No	No	None
Spec. 5.12	Spill Emergency Resp. Plan	No	Yes	See detailed findings below
Spec. 5.13	Notif, Monitoring, Reporting, Records	Yes	No	See detailed findings below
Spec. 5.14	Notifications (private spills)	No	No	None
Spec. 5.15	Failure to report	No	No	None
Spec. 5.19	Proper O/M	No	Yes	See detailed findings below

⁴ V (Violation of [REISSUED WDR](#))

⁵ AOC (Area of Concern with [REISSUED WDR](#))

Audit Conclusions

The SSMP Audit completed by Fischer Compliance LLC in collaboration with City management and field operations staff shed light on many existing successful work programs in place. When comparing the City spill data/metrics performance with other collection systems in the Santa Ana (Region 8) Water Board area, the City performs near well.

Detailed Auditing procedures incorporating review of questionnaires, the City's existing SSMP, interviews and other data were relied on for generating the detailed Audit findings for documenting the City's SSMP compliance, implementation, and effectiveness.

Several specific technical recommendations along with an implementation plan/schedule were generated for helping the City get a jump start on updating its SSMP, several months ahead of schedule before its due date on 5/2/2025. The Audit also revealed several areas to provide an advantage to help prepare the City for regulatory compliance inspections and improve SSMP effectiveness. This includes providing insights for the City to reflect on additional ways for further improving existing work programs and spill reduction measures.

Appendix 1 contains a summary of detailed interview questions and data resulting from an online interview with the City's most tenured management and field staff overseeing collection system operations and maintenance. Appendix 3 allows the City and regulators to evaluate City spill performance and other data to help compare the City's performance against other collection systems in the Region. Appendix 3 helps the City with a simplified checklist to demonstrate full implementation of the Audit findings, refine updating of the City's 2025 SSMP Update (due by 5/2/2025), and provide a roadmap of both required and recommended actions including short-term and long-term plans/schedules to be taken over the next several years. Appendix 4 provide a list of Key Performance Indicators (KPIs) for assisting the City further evaluate effectiveness of its SSMP and work program needs while Appendix 5 provides a detailed list of historic spills reported for the City to date in CIWQS.

PART 2 (Detailed Audit Findings/Recommendations)

This section provides detailed Audit findings and recommendations to provide an advantage for the City to for streamlining its 2025 SSMP Update required by the Reissued WDR. The procedures employed for this section include evaluating the City’s sewer programs against each required SSMP element required in the Reissued WDR. Requirements are presented at the beginning for each element along with an analysis of City compliance and implementation.

Additional information for helping City managers measure SSMP effectiveness and provide resilience are also included for each SSMP element in this section. This information provides a strong foundation to help the City with updating its SSMP, due by May 2, 2025. Each section ends with a checklist of common potential violations/areas and a checklist of findings including determination of compliance.

Element 1 – Goal And Introduction

1.1 Regulatory Context

11/14/2024

“The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates.”

1.2 SSMP Update Schedule

“The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of sewer spills.”

1.3 Sewer System Asset Overview

“The City Sewer System Management Plan must have an Introduction section to provide a description of the City-owned assets and service area including but not limited to.

- Location, including county(ies).
- Service area boundary.
- Population and community served;
- System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons.
- Structures diverting stormwater to the sewer system.
- Data management systems.
- Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals.
- Estimated number or percent of residential, commercial, and industrial service connections.
- Unique service boundary conditions and challenge(s).
- Reference to the Enrollee’s up to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment.”

FINDINGS (Element 1: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-1	<ul style="list-style-type: none"> • None
IMPLEMENTATION	Att. D-1	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To assess implementation, the City should annually review Element 1 entirely for ensuring all information is accurate and up to date.
EFFECTIVENESS	Att. D-1	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To help measure effectiveness and align with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Has the schedule for conducting audits been adhered to? 2. Has the schedule for updating the Sewer System Management Plan been adhered to? 3. Are established milestones being Monitored? 4. Is the sewer system management program description up to date? 5. Have audits been performed on schedule? 6. Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)? 7. Is asset data kept in the computerized maintenance management system, GIS, etc., programs up to date? 8. Does the sewer system asset overview reference up to date maps?

ELEMENT 1 – GOAL AND INTRODUCTION

Areas Assessed	SSMP Element	Audit Findings/Recommendations
RESILIENCE	Att. D-1	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To help provide resilience, the City should: <ol style="list-style-type: none"> 1. Create a work order report for auditing open work orders and assets for any repeat spill locations. 2. Implement a formal schedule for ensuring all WDR compliance deadlines are logged into management calendars.

FINDINGS (Element 1: WDR Violation/Areas of Concern Checklist⁶)

Potential Violations	Potential Violations?	Potential Areas of Concern?	Recommendation
Failure to identify appropriate goals	No	No	Revise goals and Improve narration + work program details in 2025 SSMP Update
Failure to update Sewer System Management Plan sub-elements	No	No	Improve narration in 2025 SSMP
Failure to establish process for ensuring the general public has access/input to Sewer System Management Plan	No	No	Improve narration in 2025 SSMP
Failure to complete appropriate Sewer System Management Plan audit	No	No	Improve narration in 2025 SSMP
Failure to measure effectiveness and progress	No	No	Improve narration in 2025 SSMP
Failure to develop and implement procedures for updating sewer maps	No	No	Improve narration in 2025 SSMP
Failure to provide appropriate narrative descriptions describing procedures for prioritization of system repairs and maintenance to prevent spills.	No	No	Improve narration in 2025 SSMP
Failure to describe technologies and practices to reduce spills	No	No	Improve narration in 2025 SSMP

⁶ See SSMP Development Guide, available for download on the State Water Board’s Spill Reduction Website, available at:

https://www.waterboards.ca.gov/water_issues/programs/sso/

Element 2 – Organization

REQUIREMENTS¹

“The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organizational chart of other similar narrative documentation that includes:

- The name of the Legally Responsible Official as required in section 5.1 (Designation of a Legally Responsible Official) of this General Order;
- The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan elements;
- Organizational lines of authority.
- Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. (For example, county health officer, county environmental health City, and State Office of Emergency Services).”

FINDINGS (Element 2: Analysis)

Areas Assessed	SSMP Element	Audit Findings (Potential Violations, Areas of Concern, and Recommendations)
COMPLIANCE	Att. D-2	<ul style="list-style-type: none"> • None
IMPLEMENTATION	Att. D-2	<ul style="list-style-type: none"> • None
EFFECTIVENESS	Att. D-2	<ul style="list-style-type: none"> • WDR RECOMMENDATION: Improve testing (at least annually) and documentation for after-hours spill notification system for 2025 SSMP Update • WDR RECOMMENDATION: To help measure effectiveness and align with available industry standard guidance, the City should check/verify the following, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Have there been instances when a service call for a spill was not properly routed to response personnel? 2. Was all spill response activity documented/prepared for LRO? 3. Have there been any changes in assigned responsibilities for implementing the Sewer System Management Plan? 4. Is there a process in place for ensuring all contact information remains up to date? 5. Is process established for ensuring org. chart is current?
RESILIENCE	Att. D-2	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Designate more than one LRO to help ensure full and continuous coverage of duties. 2. Ensure more than one staff member can implement and be responsible for specific Sewer System Management Plan elements. 3. Periodically review contact information throughout this element for ensuring data is up to date.

FINDINGS (Element 2: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Potential Areas of Concern?	Recommendation
Failure to properly secure Legally Responsible Official with appropriate training and experience.	No	No	Improve narration in 2025 SSMP
Failure to establish and update all related necessary responsible staff and lines of authority.	No	No	Improve narration in 2025 SSMP
Failure to establish and update City chain of communication for reporting spills.	No	No	Improve narration in 2025 SSMP

Element 3 – Legal Authority

REQUIREMENTS⁷

“The City Sewer System Management Plan must include copies or an electronic link to the Enrollee’s current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority.”

- “Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that cause blockages.”
- “Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure.”
- “Require that sewer system components and connections be properly designed and constructed.”
- “Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee.”
- “Enforce violation(s) of ordinances, service agreements, or other legally binding procedures.”
- “Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.”

⁷ See Attachment D-3 of [Reissued WDR](#) (page D-4)

FINDINGS (Element 3: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-3	<ul style="list-style-type: none"> None
IMPLEMENTATION	Att. D-3	<ul style="list-style-type: none"> None
EFFECTIVENESS	Att. D-3	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Annually review City codes and ordinances for ensuring they are adequate in fulfilling all required legal requirements. Check for instances when the code/ordinance did not address a specific need/circumstance.
RESILIENCE	Att. D-3	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Monitor performance of ordinances, codes, and agreements for deficiencies and omissions. Perform periodic review of ordinances, codes, and service agreements. Stay abreast of industry trends and local ordinances that may affect operations.

FINDINGS (Element 3: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Potential Areas of Concern?	Recommendation
Failure to establish proper codes, standards, legal agreements, and procedures for ensuring conformance to requirements.	No	No	Address conformance concerns and improve narration in 2025 SSMP

Element 4 – Operations and Maintenance Program

4.1 Updated Map of Sewer System

REQUIREMENTS⁸

“The Plan must include the items listed below that are appropriate and applicable to the Enrollee’s system.

An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s). The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries.”

4.2 Preventive Operation and Maintenance Activities

REQUIREMENTS¹

“A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors.

The scheduling system must include:

- Inspection and maintenance activities, Higher-frequency inspections
- Maintenance of known problem areas including areas with tree root problems
- Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.

The data collection system must document the data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure.”

4.3 Training

REQUIREMENTS

“In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors.

The training must cover the requirements of this General Order; the Enrollee’s Spill Emergency Response Plan procedures and practice drills, skilled estimation of spill volume for field operators, and electronic CIWQS reporting procedures for staff submitting data.”

⁸ See Attachment D-4.1 of [Reissued WDR](#) (page D-4)

4.4 Equipment Inventory

REQUIREMENTS¹

- “An inventory of sewer system equipment, including identification of critical replacement/spare parts.”

FINDINGS (Element 4: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-4	<p>WDR CONFORMANCE (AREAS OF CONCERN): To improve compliance, the City should address each of the following Areas of Concern (AOCs) revealed during the management/field staff interviews prior to completing its 2025 SSMP Update.</p> <ul style="list-style-type: none"> • AOC-4.1: Resources (see Appendix 1): Staff commented that additional staff resources could further benefit the City to be more effective and complete more work covering both routine and emergency operations throughout the City and reduce spills, including more staffing for supporting the City’s existing lower lateral maintenance program to reduce spills. The City management is now in the process of hiring part time staff for helping provide additional support including consideration of outside resources. • AOC-D4.2: Hot Spots (see Appendix 1): Staff commented that a formal “Hot Spot” reduction program to evaluate/assess and program projects in CIP to reduce areas that may not need cleaning as always historically done to reduce spills. The City does have a Hot Spot program today and could further improve effectiveness of this program with more attention and review of potential areas to eliminate via capital improvement projects. • AOC-4.3: Capital Improvements (see Appendix 1): Staff commented about on the need to improve/expedite repairs of problems/issues identified throughout sewer system, especially Grade 4/5 PACP areas. • AOC-D4.4: Force Mains (see Appendix 1): Staff commented that the City currently does not have a formal comprehensive force main O/M program for all pressure systems/pipes (and components). • AOC-D4.5: Equipment (see Appendix 1): Staff commented that the following equipment could further benefit the City’s existing O/M efforts to further reduce spills: 1) New CCTV inspection equipment and software (to replace outdated CCTV equipment); 2) New Sewer Easement Cleaning Machine for maintenance in difficult areas to access including cleaning tools ; 3) Upgraded jet rodding truck; 4) New additional lift station truck with all necessary tools for O/M; 5) New trailer-mounted Jetter; 6) New CCTV launch camaras for smaller pipes in lower sewer laterals for supporting ongoing maintenance program for these assets; 7) New hand tools where necessary for O/M. • AOC-D4.6: Pump Stations (see Appendix 1): Staff commented that replacing valves at stations could further benefit the City’s existing O/M efforts to further reduce spills. • AOC-D4.7: Staff commented that improved training on pump station bypassing, field spill reporting/requirements, volume estimation, and record keeping best practice would benefit existing competency.

ELEMENT 4 – OPERATIONS & MAINTENANCE PROGRAM

IMPLEMENTATION	Att. D-4	<ul style="list-style-type: none"> Address conformance above WDR Conformance comments to further improve implementation.
EFFECTIVENESS	Att. D-4	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Were all map updates completed in a timely manner? Are staff trained for providing map update information? Are newly installed assets incorporated into maps? Are City maintenance, operations, engineering work orders periodically reviewed for completeness? Does the City monitor “open” or “overdue” work orders? Are inspection and maintenance activities reducing the number and volume of spills? Is maintenance work being completed as scheduled? Are inspections of pipes, manholes, and lift completed? Does the City have a proactive root control program? Has all training been completed as scheduled? Have consistent training records been maintained? Have staff demonstrated ability/knowledge after trainings? Have contractors received, at a minimum, direction for 1) reporting spills, containment, securing sites? Has the inventory list been audited as scheduled? Have any inventory deficiencies or omissions been discovered?
RESILIENCE	Att. D-4	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Develop a Standard Operating Procedure (SOP) for updating maps when errors are discovered. Develop and use forms (paper or electronic) for data collection through inspections for ensuring all pertinent information is consistently collected. Periodically evaluate inspection intervals to help ensure they are optimized. Require staff to demonstrate ability and/or knowledge for all training activities. Monitor equipment and critical spare parts usage for and trends. Ensure cross-training for CIWQS Data Submitters for ensuring more than one staff member can collect/manage all required spill data and meet all required deadlines specified in Attachment E1 Reissued WDR.

FINDINGS (Element 4: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Potential Areas of Concern?	Recommendation
Failure to establish process for ensuring sewer maps are up to date.	No	Yes	Address conformance concerns and improve narration in 2025 SSMP
Failure to establish and review required maintenance program activities (CCTV, inspections, etc.)	No	Yes	Address conformance concerns and improve narration in 2025 SSMP
Failure to establish adequate training program for staff and contractors.	No	Yes	Address conformance concerns and improve narration in 2025 SSMP
Failure to establish equipment inventory including identification of critical spare parts.	No	Yes	Address conformance concerns and improve narration in 2025 SSMP

Element 5 – Design and Performance Provisions

5.1 Updated Design Criteria and Construction Standards

REQUIREMENTS⁹

“The Plan must include the following items as appropriate and applicable to the Enrollee’s system.”

- “Updated design criteria, and construction standards and specifications, for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic Capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria.”

5.2 Procedures and Standards

REQUIREMENTS¹

- “Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.”

⁹ See Attachment D-5.1 of [Reissued WDR](#) (page D-5)

FINDINGS (Element 5: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-5	<ul style="list-style-type: none"> The inspection revealed the City complies with this element.
IMPLEMENTATION	Att. D-5	<ul style="list-style-type: none"> The inspection revealed the City complies with this element.
EFFECTIVENESS	Att. D-5	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Does the City implement its current design and construction standards, specifications, and inspection procedures? Does the City periodically review design and construction standards, specifications, and inspection procedures for ensuring conformance to requirements? Does the City have a review process for its standards and procedures? Were any design or installation deficiencies found during warranty inspections? Are hydraulic model findings included in the design process? Does the City stay abreast of industry design standards?
RESILIENCE	Att. D-5	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Staying abreast of industry trends and standards. Performing warranty inspections of newly installed or repaired assets to evaluate design and installation practices. Evaluating as-built changes for trends and areas for design and performance improvements.

FINDINGS (Element 5: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	Recommendation
Failure to establish, implement, and maintain appropriate sewer standards and procedures for inspections, and testing.	No	No	Improve narration in 2025 SSMP
Failure to enforce instances of noncompliance.	No	No	Improve narration in 2025 SSMP

Element 6 – Spill Emergency Response Plan

REQUIREMENTS¹⁰

The Plan must include an up-to-date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to meet all the following.

- “Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner.
- Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State.
- Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders.
- Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained.
- Address emergency system operations, traffic control and other necessary response activities.
- Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system.
- Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State.
- Remove sewage from the drainage conveyance system.
- Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters.
- Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery.
- Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event.
- Conduct post-spill Guidance of spill response activities.
- Document and report spill events as required in this General Order.
- Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.”

¹⁰ See Attachment D-6 of [Reissued WDR](#) (page D-6)

FINDINGS (Element 6: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-6	<ul style="list-style-type: none"> • See Element 4 above
IMPLEMENTATION	Att. D-6	<ul style="list-style-type: none"> • Address above Conformance concerns to further improve compliance and implementation and avoid violations. • WDR RECOMMENDATION: Refer to Compliance recommendations above for further improving implementation.

EFFECTIVENESS	Att. D-6	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Check to ensure the City is implementing all recommendations for spill emergency response plans incorporated in SSMP Guidance Manual (see pages 35-39). 2. Does the agency implement an effective Spill Emergency Response Plan?
RESILIENCE	Att. D-6	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Provide training on a regular basis for all spill response staff. Training should include: <ol style="list-style-type: none"> 2. Determining Spill Start Time 3. Determining spill volume and volume recovered. 4. Data Collection (forms) 5. Containment and clean up. 6. CIWQS Data Submitting 7. Develop a training plan for contracted services. 8. Periodically review post-spill assessments/trends.

FINDINGS (Element 6: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	Recommendation
Failure to develop and implement a Spill Emergency Response Plan that meets all requirements.	No	Yes	Address Conformance concerns and improve narration in 2025 SSMP
Failure to test/evaluate emergency procedures during including deploying contracted services where necessary.	No	Yes	Address Conformance concerns and improve narration in 2025 SSMP
Failure for ensuring supply of adequate critical/identified spare parts/equipment prior to spills.	No	Yes	Address Conformance concerns and improve narration in 2025 SSMP
Failure to properly notify appropriate outside agencies/officials.	No	Yes	Address Conformance concerns and improve narration in 2025 SSMP
Failure to comply with Monthly No Spill Certifications	No	No	Address Conformance concerns and improve narration in 2025 SSMP

Element 7 – Sewer Pipe Blockage Control Program

REQUIREMENTS¹¹

“The Sewer System Management Plan must include procedures for the evaluation of the Enrollee’s service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags, and debris. If the Enrollee determines that a program is not needed, the Enrollee shall provide justification in its Plan for why a program is not needed. The procedures must include, at minimum:

- An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances.
- A plan and schedule for the disposal of pipe-blocking substances generated within the sanitary sewer system service area. This includes a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of substances generated within a sanitary sewer system service area.
- The legal authority prohibits discharges to the system and identifies measures to prevent spills and blockages.
- Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping, and reporting requirements.
- Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the fats, oils, and grease ordinance.
- An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and
- Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above.”

¹¹ See Attachment D-7 of [Reissued WDR](#) (page D-7)

FINDINGS (Element 7: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-7	<ul style="list-style-type: none"> None
IMPLEMENTATION	Att. D-7	<ul style="list-style-type: none"> None
EFFECTIVENESS	Att. D-7	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Have there been any blockages/spills from any identified problem area? Is the agency receiving feedback on public outreach efforts? Is the debris and other sewage solids collected during cleaning activities being disposed of appropriately? Does the agency have a plan and schedule for inspection of grease producing facilities? Was the schedule adhered to? Have there been spills due to excessive fats, oil, or grease in the system? Are Source Control staff included in the plan check process?
RESILIENCE	Att. D-7	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Inspect assets directly downstream of grease producing businesses to- ensure source control is effective. Develop outreach doorhangers or flyers to perform targeted outreach when discoveries are made in the field. Perform regular assessments of system assets to monitor performance. Establish a QA/QA process for evaluating pipe cleaning effectiveness.

FINDINGS (Element 7: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	Recommendation
Failure to identify appropriate needs for pipe blockage program.	No	Yes	Address Conformance concerns and improve

ELEMENT 7 – PIPE BLOCKAGE CONTROL PROGRAM

			narration in 2025 SSMP
Failure for ensuring adequate pipe blockage control enforcement authority.	No	No	Address Conformance concerns and improve narration in 2025 SSMP
Failure to establish residential FOG outreach	No	No	Address Conformance concerns and improve narration in 2025 SSMP
Failure to enforce requirements for instances of noncompliance.	No	No	Address Conformance concerns and improve narration in 2025 SSMP

Element 8 – System Evaluation, Capacity Assurance, Capital Improvements

REQUIREMENTS

“The Plan must include procedures and activities for

- Routine evaluation and guidance of system conditions,
- Capacity guidance and design criteria.
- Prioritization of corrective actions.
- Capital improvement plan.”

8.1. System Evaluation and Condition Guidance

REQUIREMENTS¹²

“The Plan must include procedures to:

- Evaluate the sanitary sewer system assets utilizing the best practices and technologies available.
- Identify and justify the amount (percentage) of its system for its condition to be assessed each year.
- Prioritize the condition Guidance of system areas that:
- Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, Capacity issues, or other system deficiencies.
- Are in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas.
- Are within the vicinity of a receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List.
- Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods.
- Utilize observations/Audit Findings/Recommendations of system conditions that contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State.
- Maintain documents and recordkeeping of system evaluation and condition Guidance inspections and activities,
- Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to sea level rise; flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions.”

¹² See Attachment D-8.1 of [Reissued WDR](#) (pages D-7 and D-8)

FINDINGS (Element 8: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-8	<p>WDR CONFORMANCE (AREAS OF CONCERN): To improve compliance, the City should address the following Areas of Concern (AOC) revealed during the Audit prior to completing its 2025 SSMP Update.</p> <ul style="list-style-type: none"> • <u>AOC D-8.1 (see Appendix 1):</u> Management/field crews interviewed during the Audit noted the urgent need to focus more resources and funding on capital improvement program (CIP) repairs and attention to pipes and pump stations (including potential impacts from changes in climate/wet weather for more resilience) throughout the system where necessary to reduce spills. Although the City spends on average \$1.1 million dollars per year on improvements (and increase this rate every year by \$100,000), the City should further assess its ongoing capital needs for the system against current sewer rates and budgeting adjust as necessary to consider adjustments to help avoid future problems that could cause spills.
IMPLEMENTATION	Att. D-8	<ul style="list-style-type: none"> • Address Conformance concerns above to further improve compliance and implementation and avoid violations.

Areas Assessed	SSMP Element	Audit Findings/Recommendations
EFFECTIVENESS	Att. D-8	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Number of Capacity-related spills or surcharge condition during the audit period? 2. Has the system responded to rain events as indicated by the hydraulic model? 3. Has there been any changes to zoning designations (residential, commercial, industrial)? 4. Rain event trends: Has there been changes in rain event occurrences, intensity, and duration? 5. Has the agency’s capital improvement plan been adhered to? 6. Is there an annual review of the Capital Improvement Plan by all necessary individuals? 7. Has the City adhered to its system evaluation/condition assessment efforts? Measured by annual review and update of system inspections/evaluations procedures. 8. Has the City adhered to its prioritization/corrective actions for sewer repair and Capacity improvement projects? Measured by annual review and agency prioritization/corrective actions procedures.

FINDINGS (Element 8: Potential WDR Violations/Areas of Concern Evaluation Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	Recommendation
Failure to develop and implement system evaluation, Capacity assurance, and capital improvement programs.	No	Yes	Improve narration in 2025 SSMP
Failure to identify sections holding high degree of environmental consequences if vulnerable to collapse, failure, blockage, Capacity issues, or other system deficiencies.	No	Yes	Improve narration in 2025 SSMP
Failure to identify sections located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas.	No	Yes	Improve narration in 2025 SSMP
Failure to identify assets within the vicinity of receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List.	No	Yes	Improve narration in 2025 SSMP narration in 2025 SSMP
Failure to develop and implement capital improvement plan (CIP) for necessary sewer system repairs and improvements (short term and long-term).	No	Yes	Improve narration in 2025 SSMP

Element 9 – Monitoring, Measurement, Program Modifications

REQUIREMENTS¹³

“The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:

- Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities.
- Monitoring the implementation and measuring the effectiveness of each Plan Element.
- Assessing the success of the preventive operation and maintenance activities.
- Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and
- Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes.”

FINDINGS (Element 9: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-9	<ul style="list-style-type: none"> • The inspection revealed the City complies with this element.
IMPLEMENTATION	Att. D-9	<ul style="list-style-type: none"> • The inspection revealed the City is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Att. D-9	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Are trends being monitored and corrective action taken as necessary? 2. Have Key Performance Indicators been developed to measure the effectiveness of each Sewer System Management Plan element? 3. Has a plan and schedule been established to address audit findings/deficiencies? 4. Have changes been made to work programs and procedures because of monitoring efforts?
RESILIENCE	Att. D-9	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Develop key performance indicators to measure effectiveness of the Sewer System Management Plan. 2. Perform periodic reviews of the Sewer System Management Plan to help ensure the plan is being properly implemented. 3. Develop and adhere to a timeline to correct deficiencies found during the audit process. 4. Periodically evaluate work programs to help ensure effectiveness.

¹³ See Attachment D-9 of [Reissued WDR](#) (page D-9)

FINDINGS (Element 9: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations	Areas of Concern	Recommendation
Failure to collect/maintain and evaluate relevant data for monitoring, measuring, and assessing preventive maintenance program effectiveness.	No	No	Improve narration in 2025 SSMP
Failure to update/modify agency Sewer System Management Plan based on results from audits and evaluation of data required for this element.	No	No	Improve narration in 2025 SSMP

Element 10 – Internal Audits

REQUIREMENTS¹⁴

“The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order.”

- Specifications 5.4 (Sewer System Management Plan Audits)

“The Enrollee shall conduct an internal audit of its Sewer System Management Plan, and implementation of its Plan, at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the Enrollee’s last required audit period. Within six months after the end of the required 3-year audit period, the Legally Responsible Official shall submit an audit report into the online CIWQS Sanitary Sewer System Database per the requirements in section 3.10 (Sewer System Management Plan Audit Reporting Requirements) of Attachment E1 of this General Order. Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff. The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills. The Enrollee’s sewer system operators must be involved in completing the audit. At minimum, the audit must:

- Evaluate the implementation and effectiveness of the Enrollee’s Sewer System Management Plan in preventing spills.
- Evaluate the Enrollee’s compliance with this General Order.
- Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and
- Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.
- The Enrollee shall submit a complete audit report that includes:
 - Audit findings and recommended corrective actions.
 - A statement that sewer system operators’ input on the audit findings has been considered; and
 - A proposed schedule for the Enrollee to address the identified deficiencies.”

¹⁴ See Attachment D-10 of [Reissued WDR](#) (page D-10)

FINDINGS (Element 10: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-10	<ul style="list-style-type: none"> • None
IMPLEMENTATION	Att. D-10	<ul style="list-style-type: none"> • None
EFFECTIVENESS	Att. D-10	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Have audits been performed as required? 2. Have the audits assessed compliance, implementation, and effectiveness? 3. Have deficiencies been identified? 4. Has a plan and schedule to rectify the deficiencies been established?
RESILIENCE	Att. D-10	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Periodically evaluate key performance indicators to assess effectiveness of each Sewer System Management Plan element. 2. Evaluate previous audit findings for ensuring deficiencies have all been addressed/rectified. 3. Calendar the audit due dates and complete the audit on time. 4. Prepare for announced/unannounced compliance inspections by regulators and by proactive with preparing required Audits by completing the State Water Board Pre-Inspection Questionnaire (see Appendix 1).

FINDINGS (Element 10: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations	Areas of Concern	Recommendation
Failure to conduct routine Sewer System Management Plan audits.	No	No	Address Conformance concern and Improve narration in 2025 SSMP
Failure to measure Sewer System Management Plan element effectiveness (a simple checklist will not fulfill this obligation).	No	No	Improve narration in 2025 SSMP
Failure to implement identified deficiencies/recommendations and commit to new enhancements via a plan/schedule (short and long-term).	No	No	Improve narration in 2025 SSMP

Element 11 – Communication Program

REQUIREMENTS¹⁵

“The Plan must include procedures for the Enrollee to communicate with:

- The public for spills and discharges resulting in closures of public areas, or that enter a source of drinking water, and the development, implementation, update of its Plan, including opportunities for public input to Plan implementation and updates.
- Owners/operators of systems that connect into the Enrollee’s system, including satellite systems, for system operation, maintenance, and capital improvement-related activities.”

FINDINGS (Element 11: Analysis)

Areas Assessed	SSMP Element	Audit Findings/Recommendations
COMPLIANCE	Att. D-11	<ul style="list-style-type: none"> • None
IMPLEMENTATION	Att. D-11	<ul style="list-style-type: none"> • WDR RECOMMENDATION: Ensure 2025 SSMP is publicly accessible for comments/available/prominently posted on agency website.
EFFECTIVENESS	Att. D-11	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the City should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Does the agency place all Sewer System Management Plan action items on the agenda for regular counsel/board meetings? 2. Does the agency have signage, or other means, readily available to notify the public of env. or public risk factors related to a sewage spill? 3. Does the agency regularly communicate with other systems connected to the system? 4. Was the public afforded the opportunity to provide input as the program was being implemented? 5. Does the agency perform outreach to residential customers?
RESILIENCE	Att. D-11	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the City should check/verify the following data, make adjustments as necessary, and include any Use the Sewer System Management Plan as a tool to communicate to the public how the agency is managing the system. <ol style="list-style-type: none"> 1. Maintain a consistent presence in the service area by attending community events or issuing periodic newsletters or other communications to the public. 2. Make it clear and easy for the public to contact the agency.

¹⁵ See Attachment D-11 of [Reissued WDR](#) (page D-10)

FINDINGS (Element 11: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations	Areas of Concern	Recommendation
Failure to develop and implement a public communication program, especially during emergencies.	No	No	Improve narration in 2025 SSMP
Failure to solicit input on Sewer System Management Plan content.	No	No	Improve narration in 2025 SSMP
Failure to communicate with owners/operators of sewer system(s) connected to the agency’s sewer system.	No	No	Improve narration in 2025 SSMP

Attachment E1 – Notification, Monitoring, Reporting, Record Keeping

REQUIREMENTS¹⁶

The Notification Requirements (section 1), Spill-specific Monitoring Requirements (section 2), Reporting Requirements (section 3) and Recordkeeping Requirements (section 4) in this Attachment are pursuant to Water Code section 13267 and section 13383, and are an enforceable component of this General Order.

For the purpose of this General Order, the term:

- Notification means the notifying of appropriate parties of a spill event or other activity.
- Spill-specific Monitoring means the gathering of information and data for a specific spill event to be reported or kept as records.
- Reporting means the reporting of information and data into the online California Integrated Water Quality System (CIWQS) Sanitary Sewer System Database.
- Recordkeeping means the maintaining of information and data in an official records storage system. Failure to comply with the notification, monitoring, reporting and recordkeeping requirements in this General Order may subject the Enrollee to civil liabilities of up to \$10,000 a day per violation pursuant to Water Code section 13385; up to \$1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement. Water Code section 13193 et seq. requires the Regional Water Quality Control Boards (Regional Water Boards) and the State Water Resources Control Board (State Water Board) to collect sanitary sewer spill information for each spill event and make this information available to the public. Sanitary sewer spill information for each spill event includes but is not limited to: Enrollee contact information for each spill event, spill cause, estimated spill volume and factors used for estimation, location, date, time, duration, amount discharged to waters of the State, response and corrective action(s) taken.

¹⁶ See Attachment D-11 of [Reissued WDR](#) (page D-10)

FINDINGS (Attachment E1: Analysis)

Spill Notification/Reporting Compliance: The City should develop and refine new internal procedures to avoid future notification and reporting violations (see potential violations listed below).

- 3 instances since 2007 for missing 2-hour (120 min.) Cat. 1 Cal-OES spill notification requirement
- 3 instances since 2007 for missing Draft 3 business day Cat. 1 spill report to CIWQS)

LIST OF APPENDICIES

APPENDIX 1 – City Management/Field Operations Staff Interview Information

APPENDIX 2 – City SSMP Audit Implementation Plan and Schedule

APPENDIX 3 – City Key Performance Indicator (KPIs)

APPENDIX 4 – City List of Spills (2007-2024)

Newport Beach City Field Operator Survey 10-3-24

28 Oct - 31 Oct 2024

Poll results

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- 1. Intro (Favorite Hobbies (WRITE IN))
- 1. Intro (How much experience do you have in collections (total years)?)
- 1. Intro (What are your primary job responsibilities?)
- 1_Intro (What are your LONG-TERM career goals?)
- 1. Ops (How many spills have you responded to/helped mitigate in your collections career)?
- 2. Ops (Has your agency ever been inspected or have you ever participated in an inspection by the State or Regional Water Board to evaluate WDR compliance yet)?
- 2. Ops (How well do you think your agency is doing with its ongoing spill reduction efforts)?
- 2. Ops (What examples do you have for things your agency is doing well with its ongoing spill reduction program (WRITE-IN))
- 2. Ops (What example improvement(s) would you like to see/have (procedures, equipment, more resources, new strategies, etc) for further improving your agency's spill reduction program (WRITE-IN))

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- 2. WDR (Level of familiarity (OLD collection system WDR, 2006-003-DWQ)?
- 2. WDR (Familiarity with 2022 (new "Reissued WDR", 2022-0103-DWQ)?
- 2. WDR (What specific SOPs/EOPs do you think you need (if any) for helping you do your job better (WRITE-IN)?
- 3. WDR (Do you have/utilize Standard Operator Procedures (SOPs) covering routine operations)?
- 3. WDR (Do you have/utilize emergency procedures (lift station retarts, spill emergency Ops, etc)?
- 4. WDR (What do you think about the quality of your current agency training program (emergency spill Ops)?
- 4. WDR (What SPECIFIC TRAININGS would you like to see added to your existing training program for helping you do your job better (WRITE IN)
- 5. WDR (Pipe cleaning program)?
- 5. WDR (Cleaning (wish list/things needing improvement) - WRITE IN
- 5. WDR (CCTV program)?
- 5. WDR (CCTV wish list/things needing improvement) - WRITE IN
- 5. WDR (Force main inspection program)?

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- 5. WDR (Force mains (wish list/things needing improvement) - WRITE IN
- 5. WDR (Root control program)?
- 5. WDR (Root control wish list/things needing improvement) - WRITE IN
- 5. WDR (If you had \$1M to spend for equipment/supplies to further improve your existing SPILL READINESS/RESPONSE PROGRAM, where would you recommend putting it)? (WRITE IN)
- 6. WDR (Familiarity with your agency's Sewer System Management Plan (SSMP)?
- 6. WDR (Legally Responsible Official (LRO) status)?
- 6. WDR (Anything to add not asked about earlier you would like to add to improve operations)?

1. Intro (Favorite Hobbies (WRITE IN))

003

- Gardening, surfing
- Frogs
- Cars

1. Intro (How much experience do you have in collections (total years)?

005

a. Greater than 30 years

0 %

b. a. Between 20-30

20 %

b. a. Between 10-20

80 %

Less than 10

0 %

Less than 5

0 %

1. Intro (What are your primary job responsibilities)?

(1/2)

005

1. WW Collections Utility



2. WW Maintenance Mechanic



3. WW Maintenance Electrician



4. WW Operations (Plant)



5. WW (Laboratory)



1. Intro (What are your primary job responsibilities)?
(2/2)

005

6. WW (Env Compliance)

0 %

1_Intro (What are your LONG-TERM career goals)?

0 0 4

1. Lead



2. Supervisor



3. Manager



4. Director



1. Ops (How many spills have you responded to/helped mitigate in your collections career)?

005

Greater than 100 spills events (rockstar)

0 %

Between 50 to 100 spill events

60 %

Between 10 to 50 events

40 %

0 to 10 events

0 %

2. Ops (Has your agency ever been inspected or have you ever participated in an inspection by the State or Regional Water Board to evaluate WDR compliance yet)?

005

1. Yes

0 %

2. No

100 %

2. Ops (How well do you think your agency is doing with its ongoing spill reduction efforts)?

005

a. Excellent



b. Good (a couple things to improve)



c. So So (many things to improve)



d. Not good



2. Ops (What examples do you have for things your agency is doing well with its ongoing spill reduction program (WRITE-IN))

005

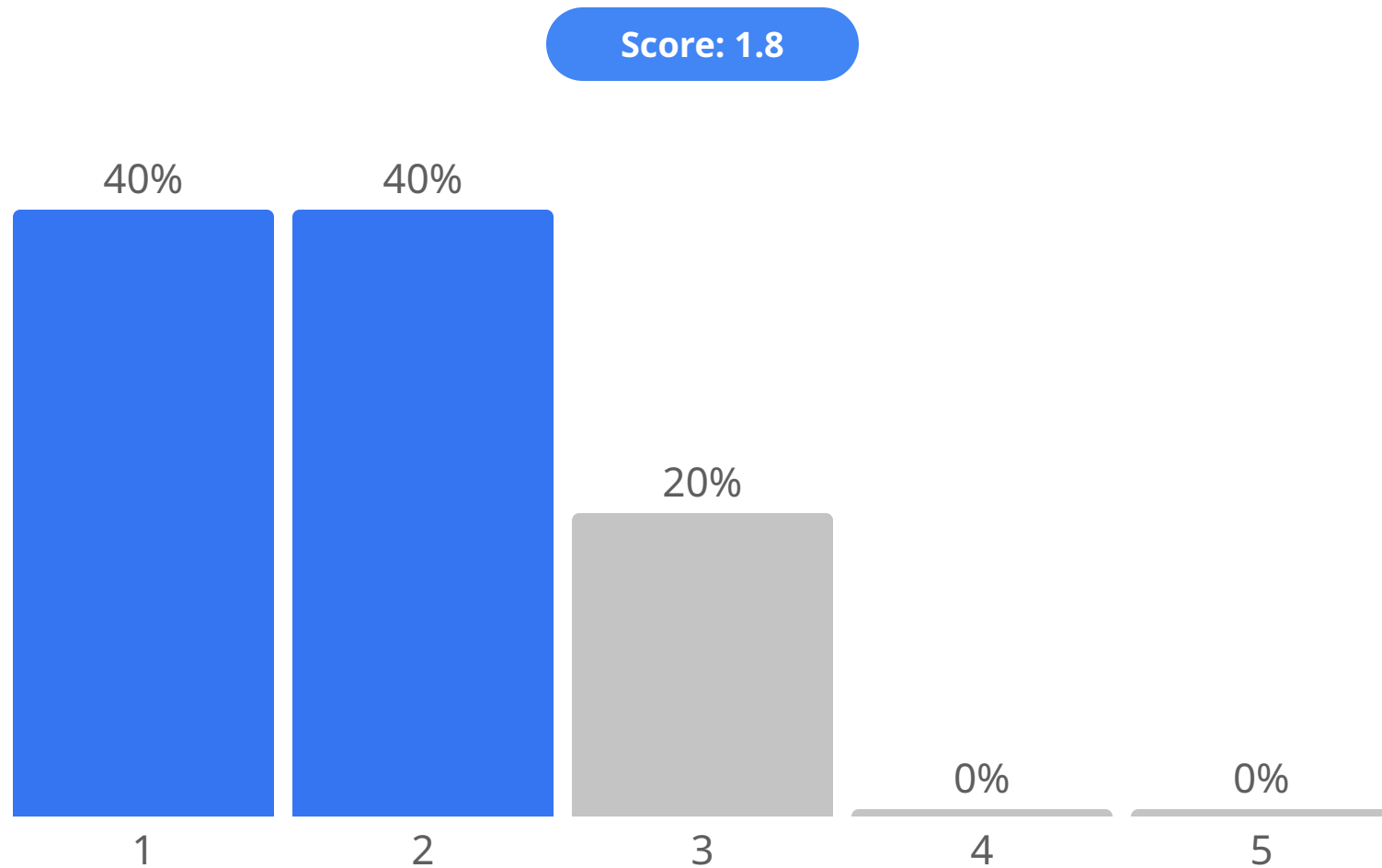
- Great equipment, training programs, plans implemented and great response times.
- We have great equipment. Training of staff is good. Best response times.
- Continuing training for staff and well maintained equipment
- Good team communication working together.
- Best response time.

2. Ops (What example improvement(s) would you like to see/have (procedures, equipment, more resources, new strategies, etc) for further improving your agency's spill reduction program (WRITE-IN)

- Easement machine
- Another small vactor
- Lower lateral inspections could use a lateral launch on CCTV camera.
Additional staff for CCTV preventive maintenance.
- Lateral launch camera.
- More staff more resources
- Upgrade older infrastructure.
- Should get New hand tools.

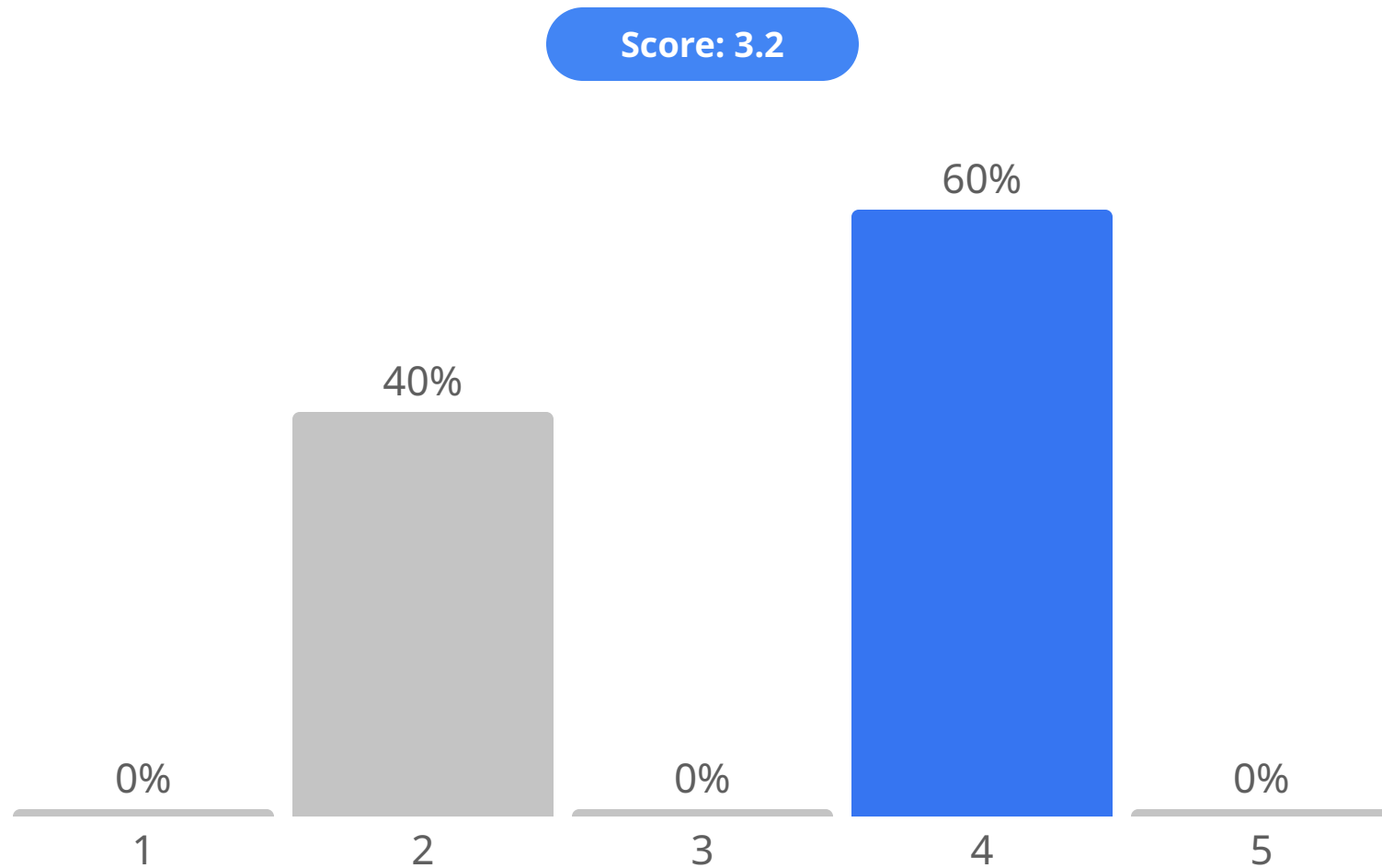
2. WDR (Level of familiarity (OLD collection system WDR, 2006-003-DWQ)?

005



2. WDR (Familiarity with 2022 (new "Reissued WDR", 2022-0103-DWQ)?

005



2. WDR (What specific SOPs/EOPs do you think you need (if any) for helping you do your job better (WRITE-IN)?

003

- Written sop
- Checklist for trouble shooting
- Having a check list.

3. WDR (Do you have/utilize Standard Operator Procedures (SOPs) covering routine operations)?

005

1. Yes



2. No



3. Only some



3. WDR (Do you have/utilize emergency procedures (lift station retarts, spill emergency Ops, etc)?

005

1. Yes



2. No



3. Only some



4. WDR (What do you think about the quality of your current agency training program (emergency spill Ops)?

005

1. Very good



2. Ok



3. Could use more improvement



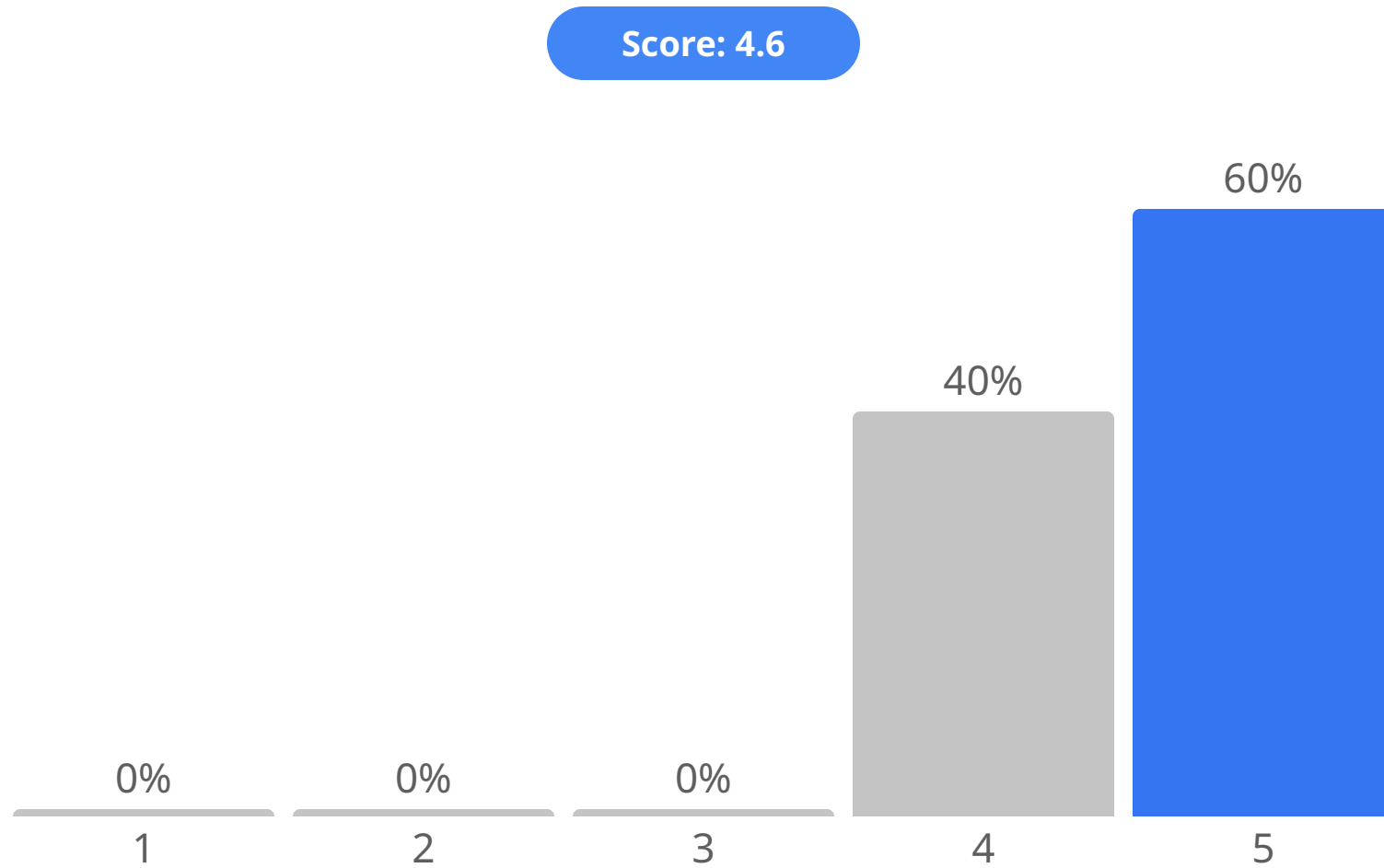
4. WDR (What SPECIFIC TRAININGS would you like to see added to your existing training program for helping you do your job better (WRITE IN))

0 0 4

- Bypass training
- Spill reporting
- More documentation training for spill reporting.
- More spill estimation training

5. WDR (Pipe cleaning program)?

005



5. WDR (Cleaning (wish list/things needing improvement) - WRITE IN

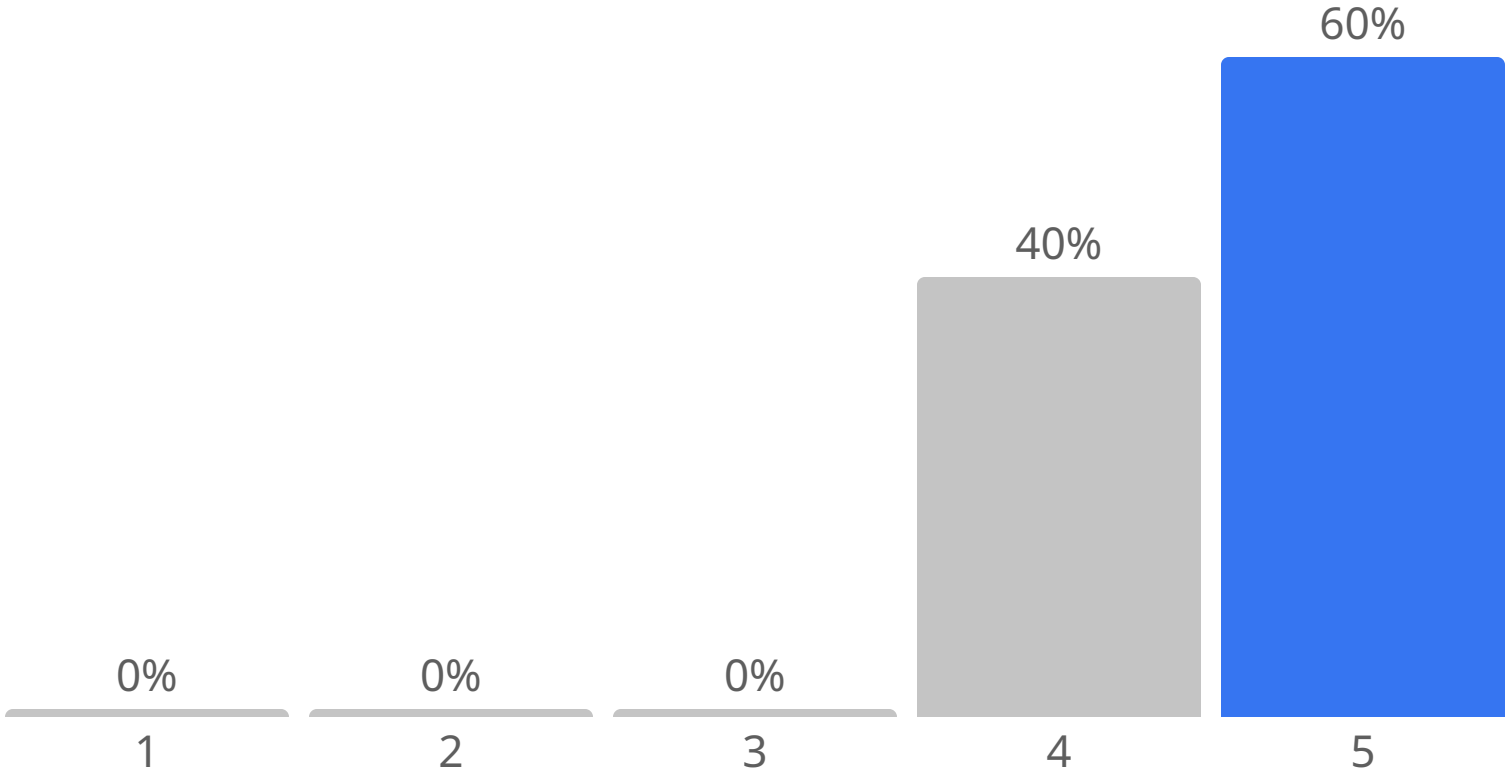
003

- Easement cleaning tools
- More hand tools
- Easement cleaning equipment

5. WDR (CCTV program)?

0 0 5

Score: 4.6



5. WDR (CCTV wish list/things needing improvement) - WRITE IN

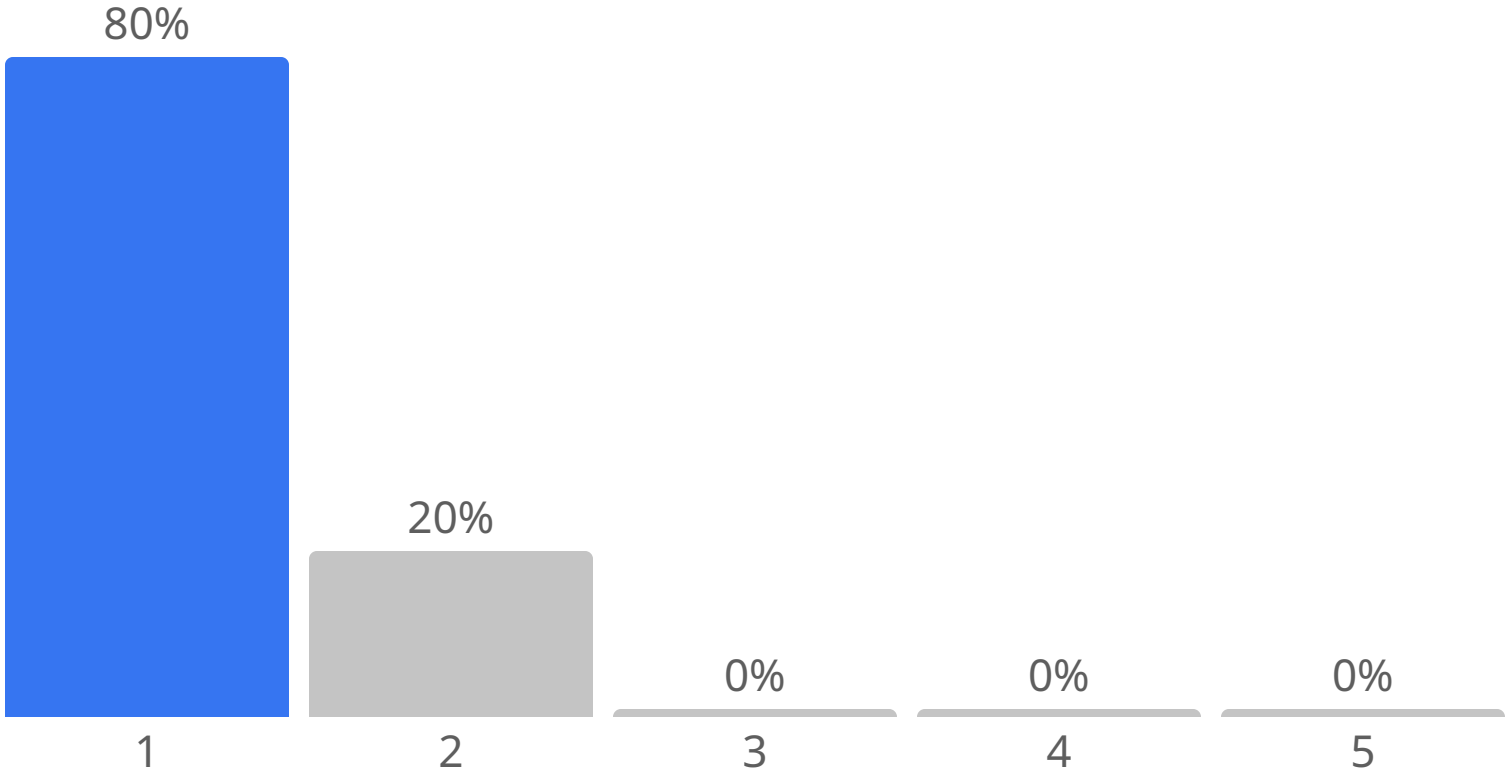
003

- More assistance with personal.
- Lateral launch, more crew members
- Lateral launch camera

5. WDR (Force main inspection program)?

005

Score: 1.2



5. WDR (Force mains (wish list/things needing improvement) - WRITE IN

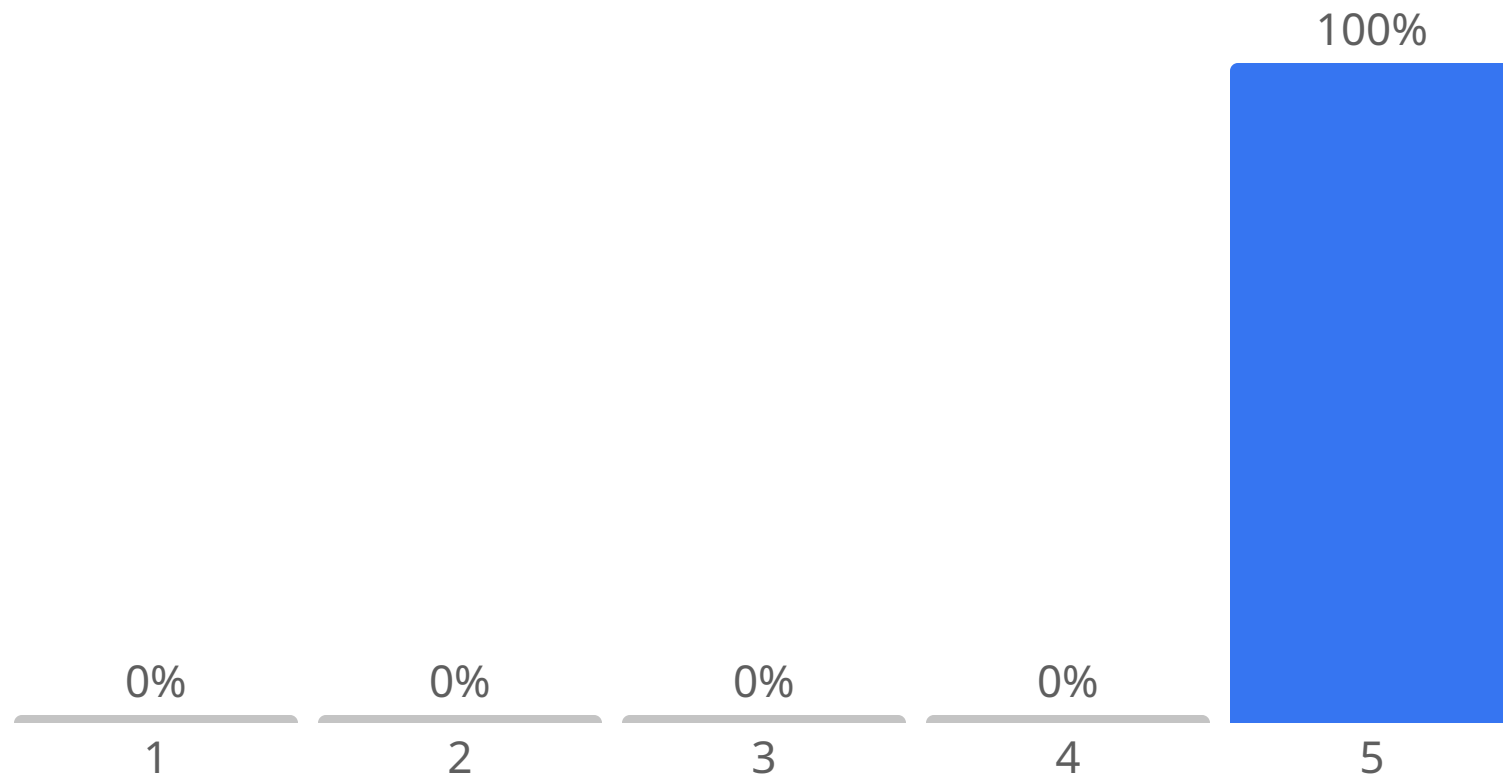
0 0 4

- Na
- Secondary force main per station.
- N/a
- No air vacs

5. WDR (Root control program)?

002

Score: 5.0



5. WDR (Root control wish list/things needing improvement) - WRITE IN

003

- None
- No
- None

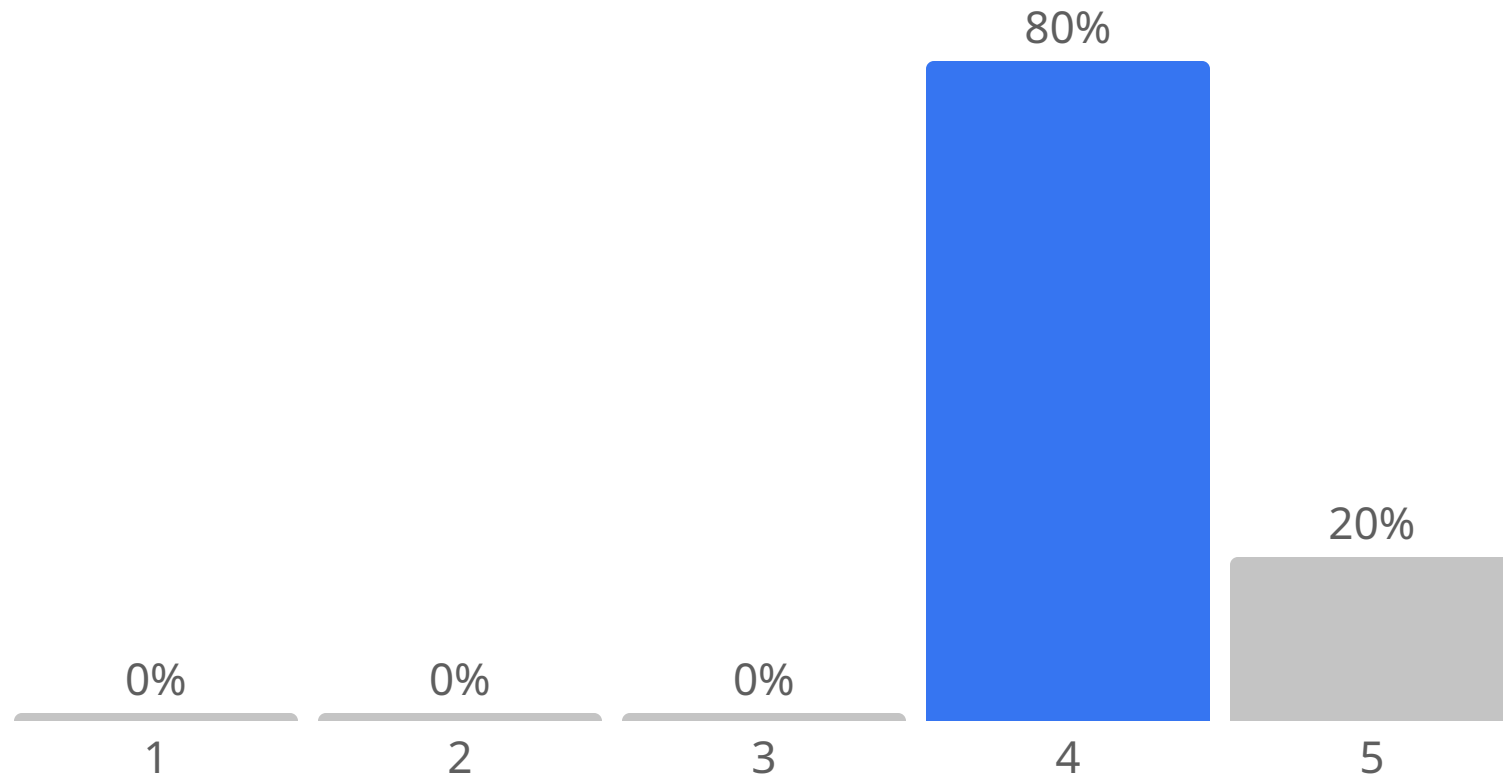
**5. WDR (If you had \$1M to spend for equipment/supplies to further improve your existing SPILL READINESS/RESPONSE PROGRAM, where would you recommend putting it)?
(WRITE IN)**

- One more rodder truck and lift station upgrades.
- New small victor for more cleaning. Replace valves at the pump stations.
- Repair/ replace pipes that are in the 4 and 5 range
- Discharge line inspections. New jet rodder truck
- More staff to get more work done . To improve maintenance to the wastewater system.

6. WDR (Familiarity with your agency's Sewer System Management Plan (SSMP)?

005

Score: 4.2



6. WDR (Legally Responsible Official (LRO) status)?

0 0 4

1. Everything OK



100 %

2. Needs more training

0 %

3. Improve oversight

0 %

4. Improve redundancy (add one more LRO)

0 %

6. WDR (Anything to add not asked about earlier you would like to add to improve operations)?

003

- Hot spot reduction program
- Definitely more CIP repairs
- Lift station improvements. More CIP repairs
- No

WDR ATTACHMENTS (CITY IMPLEMENTATION PLAN/SCHEDULE, 2024-2027)

Requirements	Type (C-Conformance or R-Recommended)	Timeline	Date Completed	Notes (LRO)
Att. D-1	None	None		
Att. D-1	None	None		
Att. D-2	None	None		
Att. D-3	None	None		
Att. D-3	None	None		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - R	11/2/24 - 5/2/25		
Att. D-5	None	None		
Att. D-6	None	None		
Att. D-7	None	None		
Att. D-8	WDR - C	11/2/24 - 5/2/25		
Att. D-9	None	None		
Att. D-10	None	None		
Att. D-11	None	None		
Att. E1	WDR - C	11/2/24 - 5/2/25		

WDR SPECIFICATIONS (CITY IMPLEMENTATION PLAN/SCHEDULE, 2024-2027)

Requirements	Type (C-Conformance or R-Recommended)	Timeline	Date Completed	Notes (LRO)
Spec. 5.1	WDR - C	11/2/24 - 5/2/25		
Spec. 5.1	WDR - C	11/2/24 - 5/2/25		
Spec. 5.2	WDR - C	11/2/24 - 5/2/25		
Spec. 5.2	WDR - C	11/2/24 - 5/2/25		
Spec. 5.3	11/2/24 - 5/2/25	11/2/24 - 5/2/25		
Spec. 5.3	None	None		
Spec. 5.4	WDR - C	11/2/24 - 5/2/25		
Spec. 5.4	WDR - C	11/2/24 - 5/2/25		
Spec. 5.6	WDR - C	11/2/24 - 5/2/25		
Spec. 5.6	WDR - C	11/2/24 - 5/2/25		
Spec. 5.10	None	None		
Spec. 5.10	None	None		
Spec. 5.11	None	None		
Spec. 5.11	None	None		
Spec. 5.12	WDR - C	11/2/24 - 5/2/25		
Spec. 5.12	WDR - C	11/2/24 - 5/2/25		
Spec. 5.13	None	None		
Spec. 5.13	None	None		
Spec. 5.14	None	None		
Spec. 5.14	None	None		
Spec. 5.15	None	None		
Spec. 5.19	WDR - C	11/2/24 - 5/2/25		

Appendix 3 – Agency Additional Key Performance Indicators (KPIs)

This document provides a list of customized Key Performance Indicators (KPIs) for the Agency to facilitate for assessing effectiveness required for the upcoming SSMP Update and subsequent SSMP Audits.

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1. ELEMENT I (Goal and Introduction)

Attach. D-1 (SSMP Goal and Introduction)

SSMP Implementation

- | | | |
|----------------------------------|--|---|
| <input type="radio"/> KPI D-1(a) | <input type="radio"/> Are the Agency's goals adequate in maintaining the sewer system, including O&M and spill reduction and response? | <u>Action:</u>
<input type="radio"/> Annual review |
| | <input type="radio"/> Does the Agency have established response time goals for customer service response? | |

SSMP Effectiveness

- | | | |
|----------------------------------|--|---|
| <input type="radio"/> KPI D-1(b) | <input type="radio"/> Are the Agency's Preventative Maintenance work plans being Implemented? | <u>Element Review Frequency/Tasks:</u>
<input type="radio"/> Annual review |
| <input type="radio"/> KPI D-1(c) | <input type="radio"/> Are Agency spill Reduction Goals being met? | <input type="radio"/> Annual review |
| | <input type="radio"/> What is the Agency's average response time for response? | <input type="radio"/> Annual review |
| | <input type="radio"/> Total number of spills prevented (plugged mains that were discovered while doing routine PM) | <input type="radio"/> Annual review |
| <input type="radio"/> KPI D-1(e) | <input type="radio"/> Are Agency spill event responses effective? | <u>Element Review Frequency/Tasks:</u>
<input type="radio"/> Annual review |
| <input type="radio"/> KPI D-1(f) | <input type="radio"/> Annual review/update of Agency goals and narrative descriptions | <u>Element Review Frequency/Tasks:</u>
<input type="radio"/> Annual review |
| <input type="radio"/> KPI D-1(g) | <input type="radio"/> Annual review/update of system performance (wet weather spill/surcharge events). | <u>Element Review Frequency/Tasks:</u>
<input type="radio"/> Annual review |
| <input type="radio"/> KPI D-1(h) | <input type="radio"/> Does the Agency update its sewer system asset inventory annually? | <input type="radio"/> Annual review |

SSMP Resilience

- | | | |
|----------------------------------|----------------------------|----------------------------|
| <input type="radio"/> KPI D-1(h) | <input type="radio"/> None | <input type="radio"/> None |
|----------------------------------|----------------------------|----------------------------|

2. ELEMENT 2 (Organization)

Attach. D-2 (Organization)

SSMP Implementation

- KPI D-2(a) ○ Are the Agency's organizational procedures adequate for ensuring full SSMP compliance?

Element Review Frequency/Tasks:

- Annual review

SSMP Effectiveness

- KPI D-2(b) ○ Does the Agency SSMP adequately describe SSMP Responsibilities/Tasks for all staffing?
- KPI D-2(c) ○ Is Agency Chain of Communication effective and updated?

Element Review Frequency/Tasks:

- Annual review

- Annual review

SSMP Resilience

- KPI D-2(d) ○ None

- None

3. ELEMENT 3 (Legal Authority)

Attach. D-3 (Legal Authority)

SSMP Implementation

- KPI D-3(a)
- Does the Agency implement its existing codes and ordinances?

Element Review Frequency/Tasks:

- Periodic review of sewer use ordinance implementation to ensure adequate required legal authority

SSMP Effectiveness

- KPI D-3(a)
- Are the Agency codes and ordinances adequate for fulfilling the SSMP legal requirements?

Element Review Frequency/Tasks:

- Annual review/update of review of completed work orders and customer complaints to ensure adequacy of authority
- Annual review/update of any encounters by staff for circumstances where sewer use ordinance was inadequate

SSMP Resilience

- KPI D-3(d)
- None

- None

4. ELEMENT 4 (Operations and Maintenance Program)

Attach. D-4 (Operations and Maintenance)

SSMP Implementation

- KPI D-4(a)
 - Are the Agency's organizational procedures adequate for ensuring full SSMP compliance?
 - Are Agency preventative maintenance programs implemented and effective?
 - Is Agency tracking metrics for miles of pipe cleaned, CCTV-inspected, and pump station inspections performed in system?

Element Review Frequency/Tasks:

- Annual review/update of Agency organizational staffing, contacts, and responsibilities
- Annual review of O/M program
- Annual review of program metrics

SSMP Effectiveness

- KPI D-4(b)
 - Are Agency maps up to date?
- KPI D-4(c)
 - % of new assets added to Agency's sewer mapping system
- KPI D-4(d)
 - Does Capital Improvement Plan (CIP) properly address Agency needs?
 - Annual Agency Capital budget for rehabilitation or replacement?
- KPI D-4(e)
 - Are Agency complete maintenance, operations, engineering work orders reviewed for accuracy and completeness?
 - Number of annual PM work orders completed?
- KPI D-4(f)
 - Is Agency Rehabilitation and Replacement (R/R) plan being implemented?
- KPI D-4(g)
 - % of Agency's CCTV goal completed
 - Number of annual CCTV work orders completed?
- KPI D-4(h)
 - Is Agency critical spare parts adequate and up-to-date.

Element Review Frequency/Tasks:

- Annual review/update to ensure all system maps are up to date per change requests submitted by field staff

Element Review Frequency/Tasks:

- Annual review/update of requirements to ensure compliance conformance.
- Annual review/update of current maps to ensure new construction project assets have been added.

Element Review Frequency/Tasks:

- Is each segment evaluated for capacity deficiencies based on projected growth
- Are system assets evaluated for remaining useful life
- Is existing CIP plan and schedule being implemented as intended?

Element Review Frequency/Tasks:

- Annual review

Element Review Frequency/Tasks:

- Annual review/update of R/R plan to ensure adherence to plan and schedule

Element Review Frequency/Tasks:

-

Element Review Frequency/Tasks:

- Bi-annual review

% if required critical spare parts in stock?

Bi-annual review

KPI D-4(i)

Has all required Agency staff training been completed?

Element Review Frequency/Tasks:

Bi-annual review

% of required training completed for wastewater collection staff

Bi-annual review

SSMP Resilience

KPI D-2(jl)

None

None

5. ELEMENT 5 (Design and Performance Provisions)

Attach. D-5 (Design and Performance Provisions)

SSMP Implementation

- KPI D-5(a) ○ Does the Agency implement its current design and construction standards, specifications, and inspection procedures?

Element Review Frequency/Tasks:

- Annual review

SSMP Effectiveness

- KPI D-5(b) ○ Are existing Agency design and construction standards, specifications, and inspection procedures adequate for the collection system?
- Annual review of the Agency's standards and procedures for acceptance and testing of new infrastructure?
- % of new infrastructure accepted vs inspected

Element Review Frequency/Tasks:

- Annual review
- Annual review
- Annual review

SSMP Resilience

- KPI D-5(c) ○ None

- None

6. ELEMENT 6 (Spill Emergency Response Plan)

Attach. D-6 (Spill Emergency Response Plan)

SSMP Implementation

- KPI D-6(a) ○ Develop and implement a Spill Emergency Response Plan

Element Review Frequency/Tasks:

- Quarterly review and training on SERP
- Quarterly training/drills on SERP including practice drills with completing field data collection form

SSMP Effectiveness

- KPI D-6(b) ○ Were Agency notification procedures outlined in the SERP adhered to for each spill event?

Element Review Frequency/Tasks:

- Annual review

- KPI D-6(c) ○ Procedures reviewed to provide prompt notification to appropriate Agency parties for a spill event?

Element Review Frequency/Tasks:

- Annual review

- KPI D-6(d) ○ Was Agency SERP training performed as prescribed in SSMP?
 - % of employees that completed annual training on SERP versus total field staff

Element Review Frequency/Tasks:

Element Review Frequency/Tasks:

- Annual review of completed checklists for all Category 1 spills >1,000 gallons reaching surface waters

- KPI D-6(e)

- Did the Agency complete a Category 1 spill assessment checklist for all large spills?

SSMP Resilience

- KPI D-6(f) ○
 - Coordinate meetings to improve mapping and Spill response activities with Kern County
 - % of Bi-annual meetings with Kern County completed

- None

7. ELEMENT 7 (Sewer Pipe Blockage Control Program)

Attach. D-7 (Sewer Pipe Blockage Control Program)

SSMP Implementation

- | | | |
|----------------------------------|--|--|
| <input type="radio"/> KPI D-7(a) | <input type="radio"/> Is Agency commercial FOG program being implemented and are goals being achieved? | <u>Element Review Frequency/Tasks:</u>
<input type="radio"/> Annual review of goals |
|----------------------------------|--|--|

SSMP Effectiveness

- | | | |
|----------------------------------|--|-------------------------------------|
| <input type="radio"/> KPI D-7(b) | <input type="radio"/> Is Agency residential FOG and root programs being administered and are goals being achieved? | <input type="radio"/> Annual review |
| | <input type="radio"/> Number of spills caused by hot spots or FOG | <input type="radio"/> Annual review |
| | <input type="radio"/> % of spills caused by FOG | <input type="radio"/> Annual review |
| | <input type="radio"/> % of spills caused by Roots | <input type="radio"/> Annual review |
| | <input type="radio"/> % of spills caused by debris/rags (non-dispersibles) | <input type="radio"/> Annual review |
| | <input type="radio"/> % of hot spots inspected annually | <input type="radio"/> |
| | <input type="radio"/> % of hot spots inspected annually | <input type="radio"/> Annual review |
| | <input type="radio"/> Number of hot spots removed from Hot Spot list annually? | <input type="radio"/> Annual review |

SSMP Resilience

- | | | |
|----------------------------------|----------------------------|----------------------------|
| <input type="radio"/> KPI D-7(e) | <input type="radio"/> None | <input type="radio"/> None |
|----------------------------------|----------------------------|----------------------------|

8. ELEMENT 8 (System Eval./Capacity/Capital Improvements)

Attach. D-7 (Sewer Pipe Blockage Control Program)

SSMP Implementation

- KPI D-8(a) ○ Has the Agency been adhered to its system evaluation/condition assessment efforts?

Element Review Frequency/Tasks:

- Annual review/update of system inspections/evaluations

SSMP Effectiveness

- % of sewer system condition assessment completed annually
- # of flowmeters installed to evaluate system capacity

- KPI D-8(b) ○ Has the Agency experienced any capacity-related spills or surcharge events?
- KPI D-8(c) ○ Have any changes occurred within the Agency service area that might affect the hydraulic model?
- KPI D-8(d) ○ Has CIP capacity-related projects/schedule been adhered to?
- KPI D-8(e) ○ Has the prioritization/corrective actions for sewer repairs been adhered to?
- KPI D-8(f) ○ Has the capital improvement plan been adhered to?

Element Review Frequency

- Annual review
- Annual review
- Annual review
- Annual review
- Annual review

SSMP Resilience

- KPI D-8(g) ○ Improve capacity-related investigations and inspections

Element Review Frequency/Tasks:

- Periodic review of flow/level sensor data (wet weather months)
- Periodic review of goals and KPIs (wet weather months)

9. ELEMENT 9 (Monitoring, Measurement, Program Modifications)

Att. D-9 (Monitoring, Measurement, Program Modifications)

SSMP Implementation

- | | | |
|--|---|--|
| <ul style="list-style-type: none">○ KPI D-9(a) | <ul style="list-style-type: none">○ Were Agency KPIs reviewed and evaluated for each element of the SSMP efforts? | <u>Element Review Frequency/Tasks:</u> <ul style="list-style-type: none">○ Annual review |
|--|---|--|

SSMP Effectiveness

- | | | |
|--|--|--|
| <ul style="list-style-type: none">○ KPI D-9(b) | <ul style="list-style-type: none">○ Were annual Agency maintenance/repair activities including Performance Measures evaluated/updated? | <u>Element Review Frequency/Tasks:</u> <ul style="list-style-type: none">○ Annual review |
|--|--|--|

- | | | |
|--|---|--|
| <ul style="list-style-type: none">○ KPI D-9(c) | <ul style="list-style-type: none">○ Were any Agency SSMP program compliance point(s) corrected and/or updated based on results of performance measures?<ul style="list-style-type: none">○ Spills per 100 miles of pipe○ Volume of spills per 100 miles of pipe○ Number of Category 1 spills○ Number of spills caused by lift station failure○ Number of repeat spills from same location | <u>Element Review Frequency/Tasks:</u> <ul style="list-style-type: none">○ Annual review |
|--|---|--|

SSMP Resilience

- | | | |
|--|--|--|
| <ul style="list-style-type: none">○ KPI D-9(d) | <ul style="list-style-type: none">○ None | <ul style="list-style-type: none">○ None |
|--|--|--|

10. ELEMENT 10 (Internal Audits)

Att. D-10 (SSMP Internal Audits)

SSMP Implementation

- KPI D-10(a) ○ Were SSMP internal program audits completed?

Element Review Frequency/Tasks:

- Review of Audit reports

SSMP Effectiveness

- KPI D-10(b) ○ Did the SSMP internal audit evaluate the SSMP for compliance?
- KPI D-10(b) ○ Did the SSMP internal audit evaluate the SSMP for effectiveness?
- KPI D-10(c) ○ Were all past SSMP internal audit findings and schedule met for incorporating new changes into SSMP?

- KPI D-10(d) ○ Were any upgrades made to enhance SSMP work programs?

Element Review Frequency/Tasks:

- Review of completed SSMP internal audits

Element Review Frequency/Tasks:

- Review of completed SSMP internal audits

Element Review Frequency/Tasks:

- Review of past SSMP internal audit commitments and priorities, including any outstanding items not captured in SSMP/change log to be flagged for carry-over for next SSMP update

Element Review Frequency/Tasks:

- Review of SSMP/change log

SSMP Resilience

- KPI D-10(e) ○ None

- None

11. ELEMENT 11 (Communication Program)

Att. D-11 (Communication Program)

SSMP Implementation

- KPI D-10(a)
- Was the public afforded the opportunity to provide input as the program is being implemented?

Element Review Frequency/Tasks:

- Periodic review to ensure board has approved latest SSMP.
- Periodic review to verify latest SSMP/docs are posted on website.
- Periodic review of any public comments received via website or direct contact with Agency staff annual review/update of KPIs

SSMP Effectiveness

- KPI D-10(b)
- Were all outside agency/communications documented?
- Number of annual public outreach events
- Number of Regional Partner meetings
- % of customers receiving public outreach information

Element Review Frequency/Tasks:

- Element Review Frequency periodic review of outside agency/satellite meetings/emails/notices of communications.

SSMP Resilience

- KPI D-10(c)
- External communications verifications

Element Review Frequency/Tasks:

- Annual review/update to ensure the general public has access to the Agency SSMP via website with a mechanism to provide input/comments

12. SPEC. 5.2 (Designation of LRO)

Spec. 5.1 (Designation of Legally Responsible Official)

SSMP Implementation

- KPI 5.1(a) ○ Does the Agency LRO and supporting staff possess adequate knowledgeable, training, skills, and abilities for implementing all Reissued WDR requirements?

Element Review Frequency/Tasks:

- Annual review/update of staff competency checks/tests

SSMP Effectiveness

- KPI 5.1(b) ○ Are Agency LRO policies in place adequate, including authorization for making managerial decisions governing operation of the sanitary sewer system, including having the explicit or implicit duty of making major capital improvement recommendations to ensure long-term environmental compliance?

Element Review Frequency/Tasks:

- Annual review/update of any issues arisen attributable to inadequate LRO oversight, training/competency
- Annual review/update of KPI frequency and success rate/adjust as necessary

- KPI 5.1(c) ○ Has the Agency complied with all the ongoing WDR deadlines?

- Annual review/update of Agency compliance performance with spill notification, monitoring, reporting, recordkeeping

- KPI 5.1(d) ○ Has the Agency complied with the change notification requirements for its LROs?

- Review of any change(s) in LRO designation(s) and meeting compliance deadlines specified in Attachment E1

- KPI 5.1(e) ○ Compliance with SWRCB pre-inspection questionnaire

- Annual review/update of questionnaire, document changes to work programs/accomplishments

- KPI 5.1(f) ○ Compliance with internal SSMP Audit findings and recommendations

- Annual review/update of past SSMP Audit findings and recommendations for improving compliance, implementation, and spill reduction performance

13. SPEC. 5.2 (Develop/Implement SSMP)

Spec. 5.2 (Development and Implementation of SSMP)

SSMP Implementation

- KPI 5.2(a) ○ Are the Agency's existing work programs effective in reducing spills to meet SSMP goals and objectives?

Element Review Frequency/Tasks:

- Annual review/update of exiting work programs to ensure conformance with SSMP goals and objectives

SSMP Effectiveness

- KPI 5.2(b) ○ Does the Agency implement standard operator procedures (SOPs) to measure and support improving SSMP effectiveness?

Element Review Frequency/Tasks:

- Annual review/update of Agency SOPs

- KPI 5.2(c) ○ Does the Agency implement standard operator procedures (SOPs) to measure and support improving SSMP effectiveness?

Element Review Frequency/Tasks:

- Annual review/update of all related SSMP procedures and work programs

- KPI 5.2(d) ○ Does the Agency's existing data collection and work order system adequately allow analysis of potential impacts that could cause spills?

Element Review Frequency/Tasks:

- Annual review/update data collection methods and work orders and documentation of accomplishments, including instances where spills were eliminated

- KPI 5.2(e) ○ Do the Agency work programs include procedures for spill containment/recovery, sewer mapping, work order system/tracking, emergency responses, and operator training?

Element Review Frequency/Tasks:

- Annual review/update of Agency work programs

- KPI 5.2(f) ○ Does the Agency meet its proposed objectives with improving its SSMP ranking >80% by October 2024?

Element Review Frequency/Tasks:

- Annual review/update and assessment/ranking of all SSMP requirements

SSMP Resilience

- KPI 5.2(g) ○ Collection system certification (CWEA)

Element Review Frequency/Tasks:

- Annual survey of line staff resources

14. SPEC. 5.6 (System Resilience)

Spec. 5.6 (Sewer System Resilience)

SSMP Implementation

- KPI 5.6(a) ○ Are the Agency's existing efforts in identifying possible spill vulnerabilities effective?

Element Review Frequency/Tasks:

- Annual review/update/update of historic spill causes and vulnerabilities

SSMP Effectiveness

- KPI 5.6(b) ○ Does the Agency proactively prioritize its operation and maintenance, condition assessments, and repair, and rehabilitation efforts to help further reduce vulnerabilities for spills??

Element Review Frequency/Tasks:

- Annual review/update of Agency CCTV records and data

- KPI 5.6(c) ○ Does the Agency assess/review its ongoing historic spills, causes, and vulnerabilities?

Element Review Frequency/Tasks:

- Annual review/update/update of historic spill causes and vulnerabilities; adjust resilience matrix as necessary

- KPI 5.6(e) ○ Does the Agency implement a program to address existing "Hot Spots" to help further reduce vulnerabilities for spills?

Element Review Frequency/Tasks:

- Annual review/update/update of "hot spot" implementation plan/schedule conformance

- KPI 5.6(f) ○ Does the Agency have a "Hot Spot" reduction program to help further reduce vulnerabilities for spills??

Element Review Frequency/Tasks:

- Annual review/update of specific "hot spot" resources (time/labor/materials) spent on cleaning all locations and list of locations repaired, resolved, and eliminated

SSMP Resilience

- KPI 5.6(h) ○ Collection system electronic monitoring
- Collection system resilience

Element Review Frequency/Tasks:

- Evaluation for installation of flow/level sensors in system areas necessary for further reducing risks for future spills and improve monitoring
- Development of Agency "resilience indicators" for measuring how well the collection system can withstand and recovery quickly from real-world stresses, setbacks and /or difficulties including major infrastructure failures

15. SPEC. 5.7 (Allocate Necessary Resources)

Spec. 5.7 (Allocate Necessary Resources)

SSMP Implementation

- KPI 5.7(a)
- Are the Agency's existing resources adequate?

Element Review Frequency/Tasks:

- Annual review/update of resource allocations and budgets specific to sewer collection system operations, maintenance, and capital improvements

SSMP Effectiveness

- KPI 5.7(b)
- Does the Agency maintain adequate means to manage revenues and expenditures for supporting the sewer collection system?

Element Review Frequency/Tasks:

- Annual review/update of Agency budget allocations/funds spent on sewer system
- Long-range review (5-10 years) of Agency financial planning for ensuring adequate budgets/allocations for sewer system operations/maintenance and capital projects

- KPI 5.7(c)
- Does the Agency maintain adequate sewer fees for supporting its the sewer system requirements?

Element Review Frequency/Tasks:

- Annual review/update of Agency sewer fees

SSMP Resilience

- KPI 5.7(d)
- None

- None

16. SPEC. 5.13 (Comply with Attachment E1 Requirements)

Spec. 5.13 (Compliance with Attachment E1 Requirements)

SSMP Implementation

KPI 5.13(a)	Are the Agency's data collection efforts (field forms, work order system) adequate for supporting all required information required by Attachment E1?	Element Review Frequency/Tasks: Annual review/update of Agency data collection and reporting efforts against Attachment E1 requirements
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SSMP Effectiveness

KPI 5.13(a)	Do Agency field data collection efforts comply with Attachment E1?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Agency field data collection forms against requirements
KPI 5.13(c)	Are required spill notification timeframes for Category 1 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 1 spills against requirements for notifying Cal-OES within 2 hours
KPI 5.13(d)	Are required spill notification timeframes for Category 2 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 2 spills against requirements for notifying Cal-OES
KPI 5.13(e)	Are required spill reporting timeframes for Category 3 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 1 spills vs. requirements
KPI 5.13(f)	Are required spill reporting timeframes for Category 4 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 1 spills vs. requirements
KPI 5.13(g)	Are the Agency field staff competent with operations, maintenance, repair, and spill response procedures?	Element Review Frequency/Tasks: Assessments (every 3 years) for all Agency field staff

SSMP Resilience

KPI 5.13(h)	Quarterly training on Agency field data collection form and required procedures	Element Review Frequency/Tasks: Quarterly training to ensure consistency with staff data collection and improving procedures as necessary
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California Integrated Water Quality System Project (CIWQS)

Spill Public Report – Spill Event ID(s) Page

Here is the detail page of your Sanitary Sewer System Spill Report search for selected Regional Board, county, responsible agency, or sanitary sewer system. These results correspond to the following search criteria:

SEARCH CRITERIA: [\[REFINE SEARCH\]](#)

- Agency (Newport Beach City)
- WDID (8SSO10590)
- Spill Type (Category 1; Category 2; Category 3)
- Agency (Newport Beach City)
- Agency (Newport Beach City)

The table below presents important details from Enrollee-submitted certified spill events, as submitted through individual spill reports, which meet the search criteria selected on the Sanitary Sewer System (SSS) Spill Report Form. If data is not shown for a particular field, it means the Enrollee did not provide the information and was not required to do so. To view the entire spill report, select the corresponding "Spill Event ID".

DRILLDOWN HISTORY: [\[GO BACK TO SUMMARY PAGE\]](#)

REGION: 8

[\[VIEW PRINTER FRIENDLY VERSION\]](#) [\[EXPORT THIS REPORT TO EXCEL\]](#)

Event ID	Region	Responsible Agency	Sewer System	WDID	Spill Category	Spill Start Date	Spill Vol (gal)	Spill Vol Recovered (gal)	Spill Vol Reached Surface Water (gal)	System Failure Location	Spill Appearance Point
890097	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1 Spill	2023-08-29 06:05	1,749	1	1,749	Gravity Mainline	Gravity Mainline,Manhole
889912	8	Newport Beach City	Newport Beach City CS	8SSO10590	Monthly Category 3 Spill	2023-08-16 11:40	300	250		Gravity Mainline	Manhole
889711	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1 Spill	2023-07-29 18:00	526	0	526	Force Main	Force Main,Pump Station
886052	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2023-02-08 03:02	280	100	180	Gravity Mainline	Lateral Clean Out (Public);Lower Lateral (Public)
879030	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2022-01-26 09:45	500	500	0	Gravity Mainline	Gravity Mainline;Manhole
866814	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2020-05-15 11:01	36	36	0	Gravity Mainline	Gravity Mainline
863192	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2019-11-24 08:30	50	1	50	Lower Lateral (Public)	Lateral Clean Out (Public)
862781	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2019-11-08 08:00	20	20	0	Lower Lateral (Public)	Lateral Clean Out (Public);Lower Lateral (Public)
861454	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2019-09-24 12:18	750	250	500	Gravity Mainline	Manhole
856943	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2019-03-12 12:00	375	75	0	Gravity Mainline	Gravity Mainline;Manhole
855911	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2019-02-01 02:01	264	3	264	Gravity Mainline	Manhole
855061	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2019-01-04 09:08	425	50	375	Manhole	Gravity Mainline;Manhole
853485	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2018-11-27 11:27	50	0	0	Lower Lateral (Public)	Lower Lateral (Public);Other sewer system structure

844618	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2018-02-05 07:45	100	40	60	Gravity Mainline	Manhole
843501	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2017-12-31 09:50	500	400	100	Gravity Mainline	Gravity Mainline;Manhole
833726	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2017-03-15 11:45	675	0	0	Manhole	Inside Building or Structure
832413	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2017-01-30 10:06	250	250	0	Force Main	Force Main
827461	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2016-08-22 08:12	10	5	10	Lower Lateral (Public)	Lateral Clean Out (Public);Lower Lateral (Public)
821957	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2016-02-09 08:02	500	200	300	Force Main	Force Main;Other sewer system structure
821253	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 2	2016-01-20 07:47	3,000	0	0	Gravity Mainline	Manhole
820380	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2015-12-24 09:22	2,000	200	1,800	Gravity Mainline	Gravity Mainline
819486	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2015-11-15 11:45	450	300	150	Gravity Mainline	Gravity Mainline;Lateral Clean Out (Public);Lower Lateral (Public)
819278	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2015-10-30 09:22	75	75	0	Spill was out of a Public cleanout in the sidewalk after a plumber cleared a blockage in the restaurant.	Lateral Clean Out (Public);Lower Lateral (Public)
818169	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 3	2015-09-19 16:30	150	150	0	Gravity Mainline	Gravity Mainline;Manhole
814609	8	Newport Beach City	Newport Beach City CS	8SSO10590	Category 1	2015-04-13 09:50	2,750	2,000	750	Gravity Mainline	Gravity Mainline;Lateral Clean Out (Private);Upper Lateral (Private)

The current report was generated with data entered by Enrollees on the previous day.

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