



Sewer System Management Plan

Volume 1

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SEWER SYSTEM MANAGEMENT PLAN (SSMP)

INTRODUCTION

During the past eight years, Montecito Sanitary District (MSD) has successfully developed, implemented and refined numerous procedures, practices and processes intended to better manage its collection system. The requirement to develop a Sewer System Management Plan (SSMP) is included in the District's National Pollutant Discharge Elimination System (NPDES) Permit No. CA0047899; issued by the State & Regional Water Quality Control Boards. In developing its SSMP the District has summarized its activities, procedures, practices and core documents as they relate to each topic required by the SSMP.

OVERVIEW



The Montecito Sanitary District is an independent special district voted into existence in 1947, by the residents of Montecito to provide for the collection, treatment and disposal of wastewater. In 1961, the District constructed a secondary level treatment plant capable of processing 750,000 gallons per day, including an ocean outfall (located 1,500 feet offshore) and a trunk sewer system. Twenty years later, voters approved \$3.1 million in revenue bonds to incorporate new technology, increase the treatment plant's capacity to 1.5 million gallons per day, implement more stringent testing procedures and provide emergency power. The District's mission has always been to protect public health and safety and to preserve the natural environment through the collection, treatment and disposal of wastewater in the most cost-effective way possible.

The District provides service to approximately 9,000 people through 3,070 service connections. It maintains approximately 80 miles of sewer pipelines and four pumping stations. The District's collection system is predominantly vitrified clay pipe (VCP) with polyvinyl chloride pipe (PVC) in the areas where sewer service was provided after 1981.

The District has attempted to reduce sanitary sewer overflows (SSOs) by applying preventive maintenance programs. Ongoing capital improvements to the collection system have also contributed to the District's excellent record.

SECTION I. GOALS

Continue to manage, operate and maintain all parts of the wastewater collection system

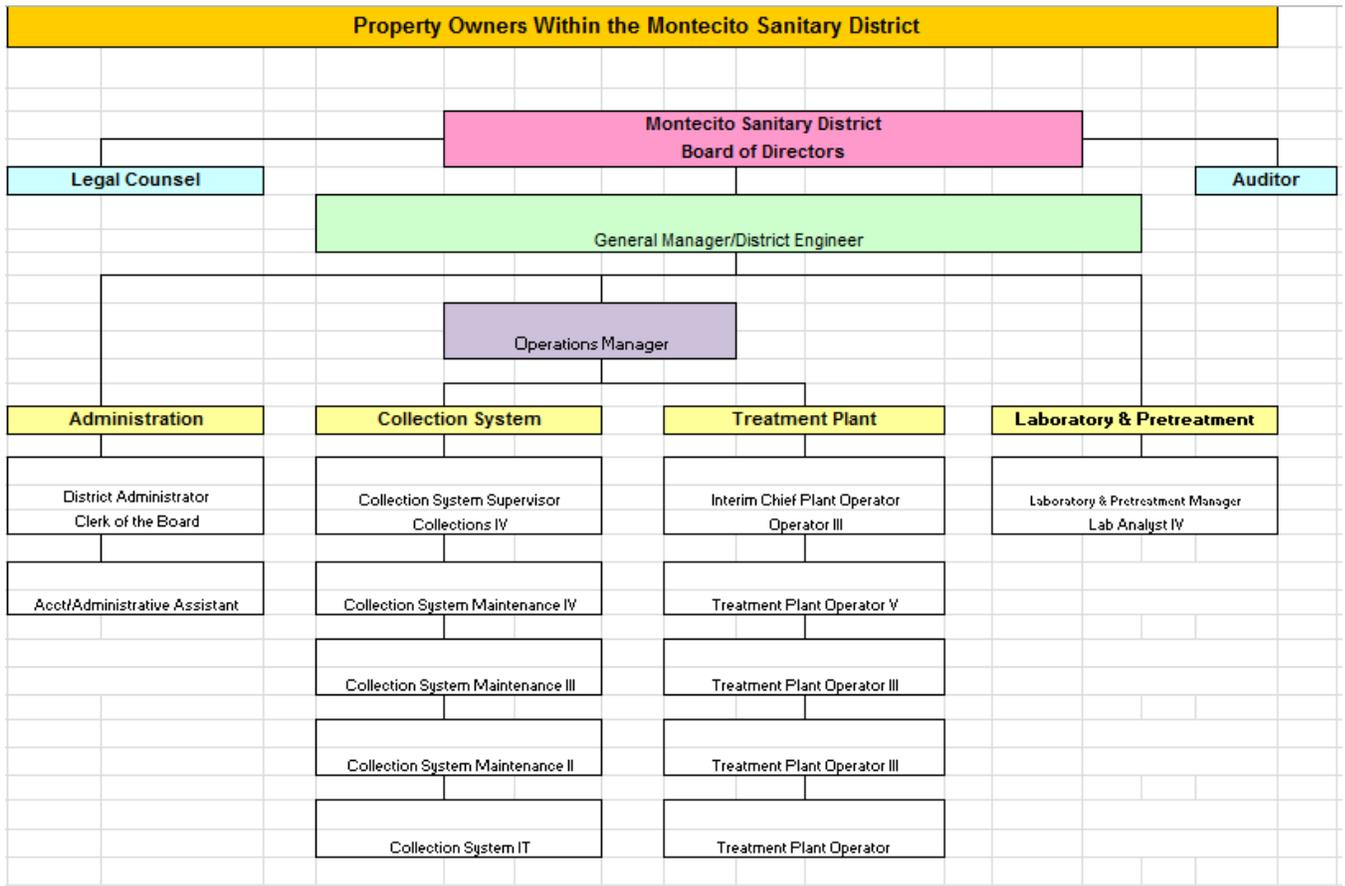
Provide adequate capacity to convey peak flows

Continue outstanding record of minimal frequency of SSOs

Mitigate the impact of SSOs

Achieve all program goals for the collection system

SECTION II. ORGANIZATION



**Montecito Sanitary District Organizational Chart
February 2014**

SECTION III. LEGAL AUTHORITY

- A.** MSD Policy for Private Sewer Lateral Investigation and Rehabilitation Program
- B.** Sewers and connections properly designed and constructed – MSD Standard Specifications for the Construction of Sewer Facilities govern all design and work in connection with sewer construction within the jurisdiction of the District.
- C.** Ensure proper installation, testing and inspection of sewers – MSD Standard Specifications for the Construction of Sewer Facilities govern the installation of new and rehabilitated sewers. The standard specifications include sections related to installation, testing and inspection. Inspection is typically performed by in-house staff. However, on certain projects the district will hire consultants to provide inspection services.
- D.** Limit fats, oils & greases (FOG) and other debris that may cause blockages or impact the collection system, lift stations and treatment plant.

SECTION IV. OPERATIONS & MAINTENANCE PROGRAM

A. Adequate Operation and Maintenance – MSD provides adequate operations and maintenance of its collection system with a staff of five full time employees. As a condition of employment all District employees are certified in Collection System Maintenance through the technical certification program of the California Water Environment Association (CWEA). In addition, the District collection system staff are trained and certified in accordance with the National Association of Sewer Service Companies (NASSCO) program for PACP, MACP, LACP. Copies of the certifications are included in the Appendix.

The District maintains a fleet of modern equipment including a Vac-Con Combination Truck, a CCTV Van, and a Water Truck. District staff is on 24/7 emergency stand-by duty which is rotated weekly amongst 5 staff members.



The District periodically utilizes contractors for several functions including construction of sewer main extensions; emergency spot repairs or replacement of broken sewer pipelines, raising and restoring manholes and end of line clean-outs and sewer rehabilitation and slip lining of existing sewer mains throughout the District.

B. Collection System Mapping – The District maintains a computerized Geographical Information System (GIS) of all mainlines, manholes, and facilities within the District. MSD uses the database to assist in the management and maintenance of the District’s facilities. The GIS database stores and

enables staff to retrieve data such as, pipe type and diameter, the approximate manhole and cleanout locations, the location of drop manholes and the length of pipe between manholes.

The GIS system also maintains the parcel history of all customers and sewer connections within the District. The GIS database is updated on a regular basis by the Administrative staff and consultants as service calls, comments and complaints come in to the office, and as connection permits are issued. A copy is included in the Appendix.

C. Information to Establish and Prioritize Wastewater Collection System Management Plan – MSD utilizes a number of resources and tools to provide information which enables the District to determine the level of maintenance activities required on each specific District asset. Closed circuit television (CCTV) inspection, manhole inspections, work history, spill history and observations from maintenance crews are examples of these resources. The District has identified through experience that roots and grease are the most likely cause of sanitary sewer overflows (SSOs) in the collection system. The preventive maintenance programs in place are explained further in Section IV. D of this document. All spills are investigated, documented and reported to the California Integrated Water Quality System (CIQWS).

D. Wet and Dry Weather Trends – Montecito is a unique residential area with lush large trees and several unusually narrow streets. Many miles of sewer mains are located within easements on private properties. It appears that during drier years, tree roots find their way into main lines and continue to thrive, creating problems. In order to locate and maintain problem areas, the District originally purchased a CCTV van in 2001 and in 2003 the District purchased a Vac-Con combination truck. In 2012, the District purchased a new CCTV van to replace the 2001 van. The new van has the latest technology in CCTV functions.

E. Routine Preventive Operations and Maintenance Activities – The District's cleaning schedule is structured such that at least 25 miles of sewer main are cleaned per year. The map of the District's collection system is divided into three sections and one section is cleaned in its entirety each year. Thus the entire collection system is cleaned in a three year time period.

CCTV inspection of mainlines is performed using the following approach: If during the course of routine cleaning of the collection system the crew encounters roots, pieces of clay pipe, rocks, muddy water etc. they will then CCTV that section of mainline for evaluation and documentation. Mainline segments with heavy root intrusion are added to a re-clean schedule. The District performs a CCTV inspection of a minimum of 10 miles of mainline pipe every year using this identification process. The information gathered during CCTV inspections is used to identify the condition of the pipelines and prioritize pipelines for rehabilitation or spot repair.

The following is more information on the District's sewer maintenance activities:

- **Sewer Mainline Rehabilitation/Slip Lining** – Mainlines identified as needing rehabilitation (slip-lining) are compiled and when a significant length of work is accumulated the District hires a consulting engineer to prepare plans and specifications for a sewer main rehabilitation project. The construction project is publically bid and a contract is awarded by the Governing Board of the District. Over the past 6 years, the District has completed 3 separate rehabilitation projects, totaling \$2.3 million in value and lining a total of 12 miles of mainline.
- **Emergency Spot Repairs** – When a pipeline is found to be deteriorated beyond the point of rehabilitation it is classified as an emergency spot repair. These spot repairs are completed immediately if necessary, but typically within a week or two of identification. The damaged pipe is excavated and replaced with a new section of PVC pipe. This work is performed by a contractor hired by the District. All work is inspected to ensure compliance with District standards. Since 2004, the District has

performed spot repairs on approximately 1,063 feet of sewer mainline in 108 locations throughout the District.

- **Manholes** – Manhole inspections are constantly being done while the collection crew is performing mainline cleaning, maintenance, and CCTV inspections. Any defects including corrosion or infiltration are noted and the manhole is marked for rehabilitation. Since January 2003, the District has raised and/or rehabilitated 231 manholes and 26 end-of-line clean-outs. In 2008, the District purchased 20 Hadronex Smart Covers which were installed into manholes throughout the collection system in 2009. In 2010-2011, the District also purchased 10 more Smart Covers. A Smart Cover is an ultrasonic water level sensor that is attached to the underside of a manhole cover and will send an alarm notifying the District when flows in the mainline reach levels that may cause a sewer overflow.
- **Lift Stations** –The District maintains four lift stations, each of which is monitored by an automatic dialing alarm system (ADAS). A Smart Cover was installed in the upstream manholes in front of each lift station, the treatment plant wet well trunk line, and in sensitive high flow areas throughout the District.



(Smart Covers)

The District conducts bi-weekly inspections of the lift stations at which time the pumps hour and flow readings are recorded. This information is entered into a spreadsheet which is reviewed regularly by the Collections System Manager.

Three of the four stations have emergency generator power available onsite which enables the lift station to operate normally in power outage situations. The fourth station is a very small air injection station which can be operated by a trailer mounted air compressor during any power outages. Additionally, all lift stations have redundant pump configurations and can operate normally with some pumps out of service.

- **Other Facilities/Equipment** – Other District equipment including pumps, valves, vehicles, generators etc., have preventive maintenance schedules as well. Many of these items are included in the computerized database for scheduling and recordkeeping. In 2012, the District purchased a 1.5- and 3-inch diameter emergency bypass pump as well as a 6-inch diameter trailer mounted emergency bypass pump to augment their emergency response equipment.

Additionally, MSD participates in the Underground Service Alert marking program. This program assists in District efforts to lessen the risk of a third party excavation or drilling operation and

accidentally damaging a District mainline. Strict District Standard Specifications for Construction and on-site inspection during construction projects also help to ensure long-term structural integrity of the collection system.

F. Structural Deficiencies and Rehabilitation Program - Periodically MSD hires engineering consultants to complete various projects. In May 2003, a consultant completed a Capital Facilities Engineering and Financial Plan. This plan provided a condition assessment of the entire collection system. Existing studies related to capacity were used to identify areas where District facilities may be insufficient to serve existing or potential development. Based on the data compiled, the consultant developed an updated and prioritized Capital Improvement Plan (CIP) including cost estimates for the CIP. The consultant also developed a long term Financial Plan to ensure that the District maintains the funds to meet future District goals. The District currently maintains substantial reserve funds dedicated to capital improvements in the collection system.

G. Training - The District is committed to having a highly trained and knowledgeable staff. The District encourages all employees to pursue professional development and all expenses incurred are reimbursed by the District. Staff regularly attends vocational training provided by industry vendors and professionals. The staff attends weekly/monthly meetings to discuss safety, emergency response and receives training in collection system operations and maintenance. All trainings are documented.

The Montecito Sanitary District and Carpinteria Sanitary District also have a joint contract for a Safety and Training Officer. The Safety and Training Officer is responsible for coordinating, performing and documenting safety training for all employees, conducting regular safety inspections and ensuring ongoing regulatory compliance.



The District's Standard Construction Contract Documents require contractors to provide records of their credentials and qualifications. All District contractors must hold a valid contractor's license in the State of California for the classifications named in the Contract Documents. The Contract Documents require the contractor to submit information certifying their general competency, experience and qualifications and the qualifications of the designated person who will act as superintendent on the project.

Contractors are required to attend a preconstruction meeting at the District prior to commencement of work. All special issues related to the job, contractor staff training and safety are discussed during the preconstruction meeting. The District's trained staff inspects workmanship and monitors contractors and their workers during the completion of the project.

Based on the size of a project, the District may contract out for Construction Management and Inspection Services. The construction manager and inspector are responsible for conducting weekly

construction meetings and inspecting the construction of the project in the field. The District staff attends the weekly construction meetings and is provided with daily inspection reports.

H. Critical Equipment and Parts Inventory – The District maintains its entire collection system to the highest level possible. All pump stations have built in redundancy to provide for routine pump maintenance and emergency backup in the event of pump failure, emergency or high flow.

Emergency response equipment and parts include a Vac-Con Combination Truck, a CCTV Van, a Harben Hydro Jet Cleaner, Mechanical Flexible Rodder, Emergency Diesel Generators, Compressor, electrical and hydraulically driven Emergency Bypass Pumps, plugs, and spill containment kits. A critical replacement parts inventory is kept on site to minimize downtime in the event of an equipment failure. Replacement pump motors, impellers, mechanical seals and a variety of electrical parts are maintained and replaced as needed. The District also has numerous vendors who can be called upon to deliver necessary parts and equipment in case of an emergency.



- **Pipelines/Manholes** – An inventory of plugs and bypass equipment are maintained to provide for stopping, diverting or bypassing flows while emergency repairs are made. The District relies on local contractors to perform most emergency repairs. These local contractors are listed on the District’s emergency call-out list to effectively respond to emergencies. These contractors also maintain a substantial inventory of critical parts including pipe, pipe fittings and repair couplings.
- **Lift Stations** – The District has four lift stations that are part of the collection system.

Lift Station No. 1

In the summer of 2010 Lift Station No. 1 was retrofit with two new pumps. Each pump is capable of handling maximum flows through the lift station. Additionally, the District has purchased a third pump, identical to the two being installed which is stored in the District inventory in case one of the duty pumps fails.

Lift Station No. 2

This lift station also has two installed pumps with each one being capable of handling the maximum flows. The District has a complete shelf unit for this lift station as well.

Lift Station No. 3

This lift station has two air injector pumps. Each of the pumps is capable of handling the maximum flows.

Lift Station No. 4

In 2009 the District completed the refurbishment of this lift station to include three pumps. Dry weather flows are easily handled with one pump running at this lift station. During wet weather flows two pumps may have to run for a very short period of time. The third pump provides built in redundancy.



- **Other Facilities Equipment** – An inventory of critical parts are kept on hand for other District facilities, equipment and vehicles. These parts are based on manufacturer’s recommendations and the experience of the maintenance staff.

I. FOG Public Education Outreach Program – The District’s public education outreach program for proper disposal of fats, oils and grease (FOG) is ongoing. The District has 25 commercial/institutional establishments that have a grease interceptor or an approved FOG device that is cleaned regularly. Because the District has a very small, focused number of commercial/institutional accounts, the District has a program to inspect the condition and cleaning of the grease interceptors of their commercial/institutional customers when the interceptor is being cleaned or at least annually. In addition to the annual inspection, a follow up inspection is specifically performed where grease is found through CCTV or mainline cleaning within the District’s mainline or when significant grease odor is identified.

The District Staff and Board Members also participate in various outreach programs to educate the community and local businesses on how to properly maintain their private sewer laterals.

Annually District Staff and Board Members are present at Montecito Beautification Day where the collection system staff assists in operating an education booth.



The District also provides tours throughout the year at the treatment plant that are provided free for students from elementary to college level.



The District's Standard Specifications for Construction of Sewer Facilities require all restaurants, food preparation establishments, or facilities with commercial kitchens to have grease interceptors, which have to be reviewed by our engineering staff for size and configuration. During inspections, the District inspector provides information regarding correct handling and disposal of fats, oils and grease (FOG) Best Management Practices with managers and staff. The District distributes pamphlets regarding FOG produced by organizations such as Water Environment Federation (WEF) and California Water Environment Association (CWEA) to the facility manager. The District participates in "Project Clean Water" and the "Green Business Plan" with the County of Santa Barbara.

The District works closely with Santa Barbara County Planning & Development for proposed new construction or demolition and reconstruction improvements to commercial properties. Plans are submitted to the District for review by the Associate Engineer. This helps to ensure that grease interceptor requirements and District Standard Specifications are followed. Additionally, Santa Barbara County Environmental Health Department inspectors work closely with District inspectors regarding grease control requirements.

Experience has demonstrated that certain residential areas can also present significant grease problems. During routine cleaning or CCTV inspection work when crews find a residential private lateral connection demonstrating significant grease buildup, the District inspection crew notifies the office and identifies the address. This sets into motion a letter to the property owner along with a CCTV picture of their blocked lateral or grease buildup on their lateral requesting the owner to contact a plumbing contractor to clear their private lateral. The letter also requests that the property owner contact the District Office once the lateral has been cleared. Property owners are informed on how to correct the current problem with their lateral and how to prevent future grease buildup issues. As mentioned earlier the District maintains contact with the industrial and commercial businesses within the District boundary regarding the grease trap/interceptor cleaning schedule and conditions.

J. Overflows From Private Property – In accordance with District Ordinance 12, the District does not own or have jurisdiction over the private property sewer lateral beyond the connection to the mainline in the street. The agency that has enforcement authority on private property spills is Santa Barbara County Environmental Health Services. Typically, the District staff is generally the first to be notified and responds to confirm if the reported sanitary sewer overflow involves the District's main line or if the problem is confined to the private lateral. The staff is very knowledgeable about the District's policy regarding lateral ownership and responsibility and is very responsive in providing the owner with immediate assistance to contain the spill. Once contained, the staff provides information

and informing property owners of the next steps to correct the overflow. The District requires that the property owner contact a plumber immediately to clear the blockage and restore flow within the private lateral.

District policy is to notify through a telephone call and fax copy, Santa Barbara County Environmental Health Services as well as electronically filing the private property spill to the California State Water Quality Control Board through the CIWQS program.

Once onsite, the collections crew will assist in the containment and disinfection of a spill until the property owner provides the necessary cleanup response. The District believes in the “Three – C’s” - Contain, Clear, Clean up. Once a private property spill occurs, District policy requires that the owner provide a video inspection of their lateral to the District. This notification is done with a letter from the District (Volume 2). After review of the video, the District outlines specific requirements regarding what repairs need to be performed and provides those requirements in a letter to the property owner. The property owner is provided information on the District’s Private Sewer Lateral Investigation and Rehabilitation Program (Volume 2).

K. Alternative Methods of Disposal for FOG – The District encourages restaurants within the District boundary use professionals experienced in servicing grease traps/interceptors for removal of the collected grease/solids and legally disposed offsite. This method of disposal diverts the waste stream from the collection system and wastewater treatment plant to facilities that can render and reclaim these products. There are no facilities in the Goleta/Santa Barbara area that accept hauled grease interceptor waste. Currently grease interceptor waste is hauled out of the area to facilities that are capable of processing the material. Methods of disposal for FOG are discussed with restaurant operators and residents during regular public education outreach activities or if discovered through routine cleaning, or CCTV inspections. All FOG generators are educated and encouraged by the District to implement specific kitchen practices requiring dirty dishes and waste food to be scraped into the trash and not put down the drain. Implementation of Best Management Practices is discussed and suggestions are made to restaurants, homeowners and institutions.

L. Fiscal Resources – Annual Sewer Service Charges are the primary revenue source used to cover the costs of operating and maintaining the collection system. The District is in compliance with State regulations requiring sewer service charges to be sufficient to cover the expenses of District’s wastewater operations. The District also receives other revenues from sources such as connection fees and engineering and administrative plan check fees.

In 2007, the Montecito Board of Director’s identified and approved “mission critical” capital improvement projects totaling approximately \$11 million. The District then issued Certificates of Participation (COP’s) to fund the capital improvement program which includes sewer main rehabilitation, lift station refurbishments and emergency repairs to the collection system. A copy of the current Capital Improvement Program list is included in Volume 2.

M. Staffing - MSD is governed by an elected at-large five member Board of Directors. The District staff consists of fourteen full-time employees. Under the direction of the General Manager / District Engineer, the Collections System Manager performs all the required collection system tasks included in the Sewer System Management Plan (SSMP). Regularly scheduled in-house staff trainings are held monthly. Additionally, California Water Environment Association (CWEA) Collection System Maintenance Certification is a mandatory condition of employment for the collections system staff. Every two years all District collection system employees are required to earn a minimum of twelve contact hours of continuing education units to maintain their CWEA Collection System Maintenance Certification.

SECTION V. DESIGN AND PERFORMANCE PROVISIONS

A. Procedural Manual and Standard Specifications for the Construction of Sanitary Sewers – This manual covers the rules and regulations and standards for a) the preparation and processing of plans for sanitary sewers to be constructed under public and private contract and b) the standard details for construction of sanitary sewer facilities.

Any preparation and processing of plans and the construction of sewage facilities within the District must comply with the requirements of the manual and related documents. In addition to the requirements in the manual, the work must comply with the applicable sections in the latest edition of the Standard Specifications for Public Works Construction (SSPWC) “The Green Book”, the Standards Plans for Public Works Construction (SPPWC) and the latest addition of the California Plumbing Code, Title 24, Part 5.

B. Standards for Inspecting and Testing New Facilities - Testing of new facilities is typically conducted by the contractor while a District Inspector witnesses the testing ensuring that it meets the District's standards. Some of the required tests include low air pressure testing of sewer lines and mandrel testing in accordance with the Green Book. District staff performs CCTV inspections on all pipeline extensions before the Board of Directors accepts the project.

SECTION VI. OVERFLOW EMERGENCY RESPONSE PLAN

A. Proper Notification Procedures - MSD has On-Call Duty/Stand-By procedures in place to ensure a timely response to any emergency. Should any member of the public call to report a possible spill, office personnel answering the telephone during business hours will dispatch the appropriate staff person to investigate the complaint. Should the incoming call occur during non-business hours, the after-hours message informs the caller to dial the cell phone of the Collections System Manager. The Collections System Manager will then dispatch the employee on stand-by duty to the site who will then report back to the Collection System Manager to determine if other personnel and/or equipment is needed.

The lift stations are programmed with an ADAS alarm system that will call the District Office during regular business hours and staff will notify the Collections System Manager immediately to respond. If the alarm is after hours, the ADAS calls the Collections System Manager first or will continue down a call list until the alarm is acknowledged. The Collections System Manager will then dispatch staff as needed.

The Smart Cover alarms in manholes throughout the District send a text message of the alarm to the General Manager, the Associate Engineer, the Collections System Manager and the Collection System Lead. These messages are followed by an email of the alarm. Smart Cover alarms are typically immediate in nature and the District always has staff within 20 minutes response time.

B. Ensure Overflow Response – The District has a written Emergency Sewer Spill Response Plan (Volume 2). The plan includes response procedures, spill classifications, field activities, documentation and reporting requirements. All District collections personnel have been trained on the Sewer Spill Response Plan.

C. Ensure Proper Notification – The Emergency Sewer Spill Response Plan outlines policies and procedures for proper notification of SSOs. The plan includes reporting requirements, a spill reporting flow chart and a notification contact list. Once the spill is documented, it is reported to the CIWQS program.

D. Ensure Staff and Contractor Training – District staff receives semi-annual refresher training on the Emergency Spill Response Plan. On all collection system projects, the District requires the Contractor to submit a detailed spill response plan for approval prior to beginning work.

E. Provide Emergency Operations – District staff is trained annually on traffic control. Additionally, staff is trained to call the Santa Barbara County Sheriff’s Department if needed.



A. Steps To Contain Sewage and Minimize Impact – The Emergency Sewer Spill Response Plan outlines policies and procedures for containing sewage spills.

B. Plan To Respond To Spills – The District has On Call/Stand-By procedures in place as discussed in item A. of this section. All District personnel can respond 24/7 within 20 minutes during business hours and within less than 45 minutes to the spill site after hours.

C. Description of Alarm Systems – District lift stations are equipped with alarm systems. Additionally, three of the District’s four lift stations have back-up diesel powered generators onsite. The District also owns a trailer mounted backup generator stored at the treatment plant that can be used to provide power to the lift station without an onsite backup generator. Additionally, this portable generator can be used as a backup should any of the on-site generators fail at Lift Stations No. 1, No. 2 or No. 4. Lift Station No. 3 is an air injector pump station. During a power outage this station can be run with a trailer mounted air compressor also stored at the treatment plant. The alarm settings at Lift Station No. 3 are set to allow ample time for District staff response prior to a spill occurring. As mentioned in Section IV. D. all the stations are equipped with the Smart Cover sensors. The District responds to all call outs within 45 minutes day or night to the spill site.

SECTION VII. FOG CONTROL PROGRAM

This is not an area of concern for the District as Montecito is a residential community. There is no industry and therefore no industrial waste.

A. FOG Control Program – The District’s collection system crew participates in the FOG Control Program by reporting grease build-up issues and problems to the Collection System Manager (Volume 2). The Collection System Manager then provides the site address and a picture of the properties lateral to the office personnel to notify to the property owner. Once notified the property owner had 90 days to comply with the District’s request to clean their private lateral.

For commercial customers with grease traps/interceptors, the District works closely with the restaurant /business to ensure their facilities are cleaned properly on a regular basis. District staff will perform inspections of the actual cleaning operation.

B. Development and Implementation of Source Control Measures – The Montecito Sanitary District (District) has adopted a set of Resolutions that address what materials can be discharged to the sewer. District Resolution No. 1961-43 prohibits the discharge of “total fat, wax, grease or oil concentration of animal or vegetable origin (living sources of more than 100 mg/L whether emulsified or not), or containing substances which may solidify or become viscous at the point of discharge into the system or in amounts that will cause interference or pass through. Local limits for specific substances have developed to protect District personnel, the collection system, and the wastewater treatment plant, the environment and prevent sanitary sewer overflows. The established local limit for oil and grease is 100 mg/L.

SECTION VIII. SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

A. System Evaluation – The District’s minimum mainline pipe size is 8 inches. From the CCTV logs of the collection system it is clear that the flow line mark is well below half way up the side wall of the pipe. This fact, in combination with the information the District is able to monitor from the SmartCover units, enables the District to be confident that there is currently adequate capacity for current maximum day dry and peak wet weather flows. Given that minimal development has occurred in the District since time the system was designed it is the opinion of the District that there is no need to complete a costly capacity analysis of the collection system. Short term and long term capital improvement projects are developed and prioritized based on the collection system cleaning and inspection program.

B. Capacity Enhancement Measures – The District continues their efforts to find the sources of wet weather inflow and infiltration (I&I) into the collection system. Pipeline rehabilitation projects, the private sewer lateral replacement program and data from the Smart Cover units assist the District in this investigative effort. The net results of the District's I&I reduction efforts continually improving.

C. Plan Updates – The District is currently working to complete “mission critical” capital improvement projects which were indentified and approved by the District Board in 2007. There are several collection system projects on the list however the capital improvement needs of the District are constantly being considered and new or additional projects may be identified at anytime. It is currently planned to complete the projects on the “mission critical” list by 2012.

SECTION IX. MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

A. Monitor Implementation and Effectiveness of SSMP - The collection crew follows predetermined schedules for all maintenance duties. The progress is tracked in the collection system database. Regular daily morning meetings are a forum for communicating what work is the on schedule. It is also an opportunity to discuss any problems which may have been identified. Changes can and are readily made to the planned work as needed to address higher priorities in the collections system.

B. Update Program Elements – Program elements are updated as needed based on performance and effectiveness.

C. Modify SSMP as Appropriate – The District’s SSMP will be reviewed for accuracy and updated as needed on an annual basis. The SSMP is available for audit at all times.

SECTION X. SSMP PROGRAM AUDITS

As part of the SSMP, the District will conduct periodic internal audits. In accordance with State requirements, these audits occur every two years and a report is prepared and kept on file. The audits focus on evaluating the effectiveness of the SSMP and the District compliance with the SSMP.

SECTION XI. COMMUNICATION PROGRAM

The District maintains a website to inform the public about its activities. Typical information available on the website includes general information about the District. The website also serves to update the public on any late-breaking news. Contact information for the District is available on the website.