Council/Agency Meeting Held:_____ Deferred/Continued to:_____ ❑ Approved ❑ Conditionally Approved ❑ Denied	_____ City Clerk's Signature
Council Meeting Date: 7/16/2007	Department ID Number: 07-042

CITY OF HUNTINGTON BEACH
REQUEST FOR CITY COUNCIL ACTION

SUBMITTED TO: HONORABLE MAYOR AND CITY COUNCIL MEMBERS

SUBMITTED BY: PENELOPE CULBRETH-GRAFT, DPA, CITY ADMINISTRATOR

PREPARED BY: TRAVIS HOPKINS, PE, ACTING DIRECTOR OF PUBLIC WORKS ENGINEERING

SUBJECT: Approve the Sanitary Sewer Management Plan Development Plan and Schedule

Statement of Issue, Funding Source, Recommended Action, Alternative Action(s), Analysis, Environmental Status, Attachment(s)

Statement of Issue: The State Water Resources Control Board Order No. 2006-0003 requires local governing board approval of the Sanitary Sewer Management Plan (SSMP) Development Plan and Schedule.

Funding Source: No funding is necessary for this action.

Recommended Action: Motion to: Approve the General Waste Discharge Requirements (WDRs) Sewer System Management Plan Development Plan and Schedule dated September 30, 2002.

Alternative Action(s): Do not approve the General Waste Discharge Requirements (WDRs) Sewer System Management Plan Development Plan and Schedule dated September 30, 2002 and direct staff on how to proceed.

E-6

Analysis: In 2002, the Santa Ana Regional Water Quality Control Board (RWQCB) issued Order No. R8-2002-0014 which required the City to develop several programs to prevent sanitary sewer overflows. The final deliverable to meet this Order was the development of a Sanitary Sewer Management Plan (SSMP) which was completed on September 30, 2005. An intermediate deliverable, the SSMP "Development Plan and Schedule," which described how the City would meet the various other deliverables and their associated due dates, was also prepared and submitted to the RWQCB on September 30, 2002.

In 2006, the State Water Resources Control Board issued Order No. 2006-0003, which is substantially verbatim to the RWQCB Order, to cover the entire state. By virtue of the City's compliance with the RWQCB Order, only minimal effort is required to meet the requirements as stipulated in the State's Order. The State Order requires that the SSMP Development Plan and Schedule be approved by the local governing board, while the RWQCB Order did not. Therefore, the previously prepared Development Plan and Schedule is being submitted for approval to meet this requirement.

Strategic Plan Goal:

(I-1) Improve the City's plan for funding and completing infrastructure needs, and develop strategies for resolving crucial infrastructure problems to preserve the physical foundation of the community and enable the community's value to grow.

Public Works Commission Action: No action necessary.

Environmental Status: Not applicable

Attachment(s):

City Clerk's Page Number	No.	Description
3	1.	General Waste Discharge Requirements Sewer Management Plan Development Plan and Schedule

E6 . 2

ATTACHMENT #1

INTENTIONALLY
LEFT
BLANK

RWQCB, SANTA ANA REGION
ORDER NO. R8-2002-0014

GENERAL WASTE DISCHARGE REQUIREMENTS (WDRs)
SEWER SYSTEM MANAGEMENT PLAN

DEVELOPMENT PLAN AND SCHEDULE

SEPTEMBER 30, 2002

Prepared By:

CITY OF HUNTINGTON BEACH

INTRODUCTION

The table below has been prepared to translate the Waste Discharge Requirements (WDRs) for Sewers (Order No. R8-2002-0014), into a list of deliverables to facilitate understanding of the requirements. This document is meant to serve as a comprehensive status checklist for Departments within the City of Huntington Beach, which are affected by the conditions of this Order.

WDR Reference	Deliverables	Notes	Due Dates
C. PROVISIONS			
2. Discharges Caused by Severe Natural Conditions The Regional Board may take enforcement action against the permittee for any sanitary sewer system discharge caused by natural conditions, unless the permittee demonstrates through properly signed, contemporaneous operating logs, or other relevant evidence that: (i) The discharge was caused by severe natural conditions (such as hurricanes, tornadoes, flooding, earthquakes, tsunamis, and other similar natural conditions); (ii) There were no feasible alternatives to the discharge, such as retention of untreated wastewater, reduction of inflow and infiltration, use of adequate backup equipment, or an increase in the capacity of the system. This provision is not satisfied if, in the exercise of reasonable engineering judgment, the permittee should have installed auxiliary or additional collection system components, wastewater retention, adequate back-up equipment or should have reduced inflow and infiltration. This provision is also not satisfied if the agency does not undergo a periodic or continuing planning to identify and correct problems.	✓ SSO Emergency Response Plan ✓ Sewer Master Plan, which identifies redundant systems and potential areas of Inflow/Infiltration.	City enacted Administrative Regulation 808 effective January 1, 2002, which describes the Sanitary Sewer Overflow Response Procedures. In the Summer of 2002, the City updated the Sewer Master Plan including an I/I study, which identifies potentially deficient sewer infrastructure. Each component will be further evaluated as part of our Capital Improvement Plan.	SSO Emergency Response Plan due by January 1, 2003 Capacity Evaluation due by July 30, 2005

WDR Reference	Deliverables	Notes	Due Dates
3. Discharges Caused by Other Factors For SSOs other than those covered under this section, the permittee may establish an affirmative defense to an action brought for noncompliance if the permittee demonstrates through properly signed, contemporaneous operating logs, or other relevant evidence that: (i) The permittee can identify the cause of the discharge event; (ii) The discharge was exceptional, unintentional, temporary and caused by factors beyond the reasonable control of the permittee; (iii) The discharge could not have been prevented by the exercise of reasonable control, such as proper management, operation and maintenance; adequate treatment facilities at OCSD two regional treatment plants or collection system facilities or components (e.g., Adequately enlarging treatment or collection facilities to accommodate growth or adequately controlling and preventing infiltration and inflow); preventive maintenance; or installation of adequate backup equipment; and (iv) The permittee took all reasonable steps to stop, and mitigate the impact of, the discharge as soon as possible.	❑ Sewer System Management Plan (SSMP)	Through adherence to the WDR, the City can establish an affirmative response.	SSMP completed by September 30, 2005

E6.6

WDR Reference	Deliverables	Notes	Due Dates
4. Burden of Proof In any enforcement proceeding, the permittee has the burden of proof to establish that the criteria in this section have been met. **5.** In an enforcement action, it shall not be a defense for the discharger that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this Order.	E6.7	No Action Required	
6. Upon reduction, loss, or failure of the sanitary sewer system resulting in a sanitary sewer overflow, the discharger shall, to the extent necessary to maintain compliance with this Order, take any necessary remedial action to: (1) Control or limit the volume of sewage discharged, (2) Terminate the sewage discharge as rapidly as possible, and (3) Recover as much of the sewage discharged as possible for proper disposal, including any wash down water. The dischargers shall implement all remedial actions to the extent they may be applicable to the discharge, including the following: a. Interception and rerouting of sewage flows around the sewage line failure; b. Vacuum truck recovery of sanitary sewer overflows and wash down water; c. Cleanup of debris of sewage origin at the overflow site.	✓ SSO Emergency Response Plan	City enacted Administrative Regulation 808 effective January 1, 2002, which describes the Sanitary Sewer Overflow Response Procedures.	SSO Emergency Response Plan due by January1, 2003

WDR Reference	Deliverables	Notes	Due Dates
7. **The discharger shall properly fund, manage, operate and maintain, with adequately trained staff and/or contractors possessing adequate knowledge skills and abilities as demonstrated through a validated program at all times, all parts of the sewage collection system owned and/or operated by the discharger.**	☐ Sewer System Management Plan	Funding and training to be reported in the SSMP. In the Summer of 2001, City Ordinance 3504 was adopted to implement a Sewer Service User Charge for the maintenance and repair of Sewer Infrastructure. 8 out of 10 City sewer maintenance workers hold certifications for wastewater collection systems through CWEA.	SSMP completed by September 30, 2005
8. **The discharger shall provide adequate capacity to convey base flows and peak flows, including wet weather related events to the minimum design criteria as defined in the dischargers System Evaluation and Capacity Assurance Plan, for all parts of the collection system owned or operated by the discharger.**	✓ Sewer Master Plan, which evaluates capacity.	In the Summer of 2002, the City updated the Sewer Master Plan including an I/I study, which identifies potentially deficient sewer infrastructure. Each component will be further evaluated as part of our Capital Improvement Plan.	Capacity Evaluation due by July 30, 2005
9. **The discharger shall take all feasible steps to stop, and mitigate the impact of, sanitary sewer overflows in portions of the collection system owned or operated by the discharger.**	✓ SSO Emergency Response Plan	City enacted Administrative Regulation 808 effective January 1, 2002, which describes the Sanitary Sewer Overflow Response Procedures.	SSO Emergency Response Plan due by January 1, 2003
10. **The discharger shall provide notification to the OCHCA and the Regional Board so that they can notify parties with a reasonable potential for exposure to pollutants associated with the SSO.**	✓ SSO Emergency Response Plan	City enacted Administrative Regulation 808 effective January 1, 2002, which describes the Sanitary Sewer Overflow Response Procedures.	SSO Emergency Response Plan due by January 1, 2003

E6.8

WDR Reference	Deliverables	Notes	Due Dates
11. The discharger shall develop and implement a written plan, a Sewer System Management Plan (SSMP), for compliance with these waste discharge requirements and make it available to any member of the public upon request in writing.	❑ Sewer System Management Plan	Engineering staff will be responsible to gather the required information and compile the report. A Draft SSMP with available information shall be prepared by June 1, 2003 or sooner.	SSMP completed by September 30, 2005
12. The essential elements of the SSMP are specified below. If the discharger believes that any element of this section is not appropriate or applicable for the SSMP program, the program does not need to address it, but the SSMP must explain why that element is not applicable. The Regional Board will consider the quality of the SSMP, its implementation and effectiveness in any relevant enforcement action, including but not limited to any enforcement action for violation of the Clean Water Act, the Basin Plan prohibition, or these waste discharge requirements. The SSMP must include the following components, with the exception of non-applicable components, as discussed above:	❑ Sewer System Management Plan	The City currently has in place the majority of the components required. Those components, which are not complete, shall be noted below with anticipated time frame for completion.	SSMP completed by September 30, 2005
SEWER SYSTEM MANAGEMENT PLAN (SSMP)			
(i) **Goals.** The main goal of the SSMP is to prevent SSOs and to provide a plan and schedule for measures to be implemented to prevent SSOs.	✓ Prepare an SSMP Development Plan and Schedule	This document	SSMP Development Plan due by September 30, 2002

E6.9

WDR Reference	Deliverables	Notes	Due Dates
(ii) Organization. The SSMP must identify: (A) Administrative and maintenance positions responsible for implementing measures in the SSMP program, including lines of authority by organization chart or similar document; and	❑ Overall organizational chart, including governing body	Engineering Staff to prepare Org. Chart by January 1, 2003	SSMP completed by September 30, 2005
(B) The chain of communication for reporting SSOs, from receipt of a complaint or other information including the person responsible for reporting SSOs to the Regional Water Quality Control Board, Orange County Health Care Agency, and State Office of Emergency Services (OES) if the discharge is 1,000 gallons or larger.	✓ SSO Emergency Response Plan	SSO Emergency Response Plan details chain of communication.	SSO Emergency Response Plan due by January 1, 2003
(iii) Legal Authority. The SSMP shall include legal authority, through sewer use ordinances, service agreements or other legally binding documents, to: (A) Control infiltration and connections from inflow sources;	✓ Sewer use ordinance that defines and controls discharges to the collection system, connections from inflow sources such as; sump pumps, roof leaders, yard and stairwell drains or any other materials that adversely affects the performance of the collection system.	Municipal Code 14.36 requires the review and approval by the City to insure proper use.	Legal Authority due by July 30, 2004
(B) Require that sewers and connections be properly designed and constructed; (C) Ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated service laterals);	✓ Design and construction specifications based on current engineering and construction practices ✓ City Specifications, which supplement the Greenbook.	Municipal Code 14.36 requires the review and approval by the City to insure proper design and construction methods. All permitted sewer construction is inspected by City Inspectors.	
(D) Limit fats and greases and other debris, which may cause blockages in the sewage collection system. (E) Implement the general and specific prohibitions of the national pretreatment program under 40 CFR 403.5.	❑ A grease control program for commercial, industrial, and institutional users that combines source and field control to reduce SSOs caused by the discharge of FOG to the collection system. ❑ Statement to be added identifying the City as a collection Agency with pretreatment by the OCSD.	City is currently participating both monetarily and as a member of the FOG Steering Committee. (See item viii)	FOG Control Program due by 12/30/04

E6 . 10

WDR Reference	Deliverables	Notes	Due Dates
(iv) Measures and **Activities:** In order to provide an adequate and appropriate SSO reduction plan, the SSMP must address the elements listed below that are appropriate and applicable to the dischargers system and identify the person or position in the organization responsible for each element: (A) Provide adequate operation and maintenance of facilities and equipment; (B) Maintain an up-to-date map of the collection system showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and stormwater conveyance facilities; (C) Maintain relevant information to establish and prioritize appropriate SSMP activities (such as the immediate elimination of dry weather overflows or overflows into sensitive waters, such as public drinking water supplies and their source waters, swimming beaches and waters where swimming occurs, shellfish beds, (D) Outstanding National Resource Waters, National Marine Sanctuaries, waters within Federal, State, or local parks, and water containing threatened or endangered species or their habitat), and identify and illustrate trends in overflows, such as frequency and volume; (E) Routine preventive operation and maintenance activities by staff and contractors; including a system for scheduling regular maintenance and cleaning of the collection system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system of tracking work	☐ List of dedicated staff and material resources (equipment and spare parts) needed to operate and maintain the system assets so the intended function (conveyance capacity) is maintained. ✓ Complete and accurate set of maps of the collection system that is available for management, operation and maintenance of the collection system and an established process to maintain and update map of the collection system including, all gravity lines and force-mains, manholes, pumping facilities, siphons and other appurtenances. ✓ Update the Sewer Master Plan to identify any capacity issues with special attention given to that infrastructure in close proximity to sensitive environs. ☐ A proactive maintenance program that consists of a balance of planned and scheduled preventive/predictive maintenance (pumping station electrical and mechanical systems, hydraulic and mechanical cleaning, inspection and condition assessment, Rights-of-Way and Easements, etc.) and corrective maintenance by staff and contractors. ✓ Capacity management program that provides an accurate, current capacity analysis of the system and compares to capacity needs.	Under the direction of the current Maintenance Operations Manager, maintenance staff currently maintains an org chart with duties and a current list of equipment and spare parts. (Submit to Engineering by January 1, 2003) The City currently maintains maps of its collection system through its GIS system under the direction of the Deputy Director of Public Works and the Engineering staff. Digital Maps currently available to Engineering Staff with hard copies to Maintenance Staff. In the Summer of 2002, the City updated its Sewer Master Plan and will evaluate priorities accordingly. Maintenance staff currently adheres to a planned maintenance schedule. (Submit to Engineering by January 1, 2003) In the Summer of 2002, the City updated its Sewer Master Plan, which includes potential capacity deficiencies. (Engineering Staff to prepare a priority list by June 1, 2003 or sooner)	Preventive Maintenance Program due by 06/15/03 Capacity Evaluation Program due by 07/30/05 Sewer Rehab. Plan due by 09/30/05.

E6.11

WDR Reference	Deliverables	Notes	Due Dates
orders and assessing the success of the PM program;			
(F) Establish a program to assess the current capacity of the collection system owned by the discharger or where the discharger has operational control; including diversions of urban runoff to the sewer system and control of infiltration and intrusion during both wet weather events and dry weather periods;	❑ System condition assessment, based on priorities established through a structured asset management plan. Inventory of defects that require periodic preventive maintenance to maintain capacity.	City has video inspected over 40% of its System. Beginning October 1, 2002, our video inspection program will be resumed in order to provide for a Sewer Rehabilitation Plan to be prepared by Engineering Staff.	
(G) Identify and prioritize structural deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. This shall include a rehabilitation plan including schedules for the entire system. As with the PM program, sewer rehabilitation and replacement is crucial for the prevention of spills. Among the provisions that should be specified in this section is the need to direct rehabilitation and replacement at sewer pipes which are at risk of collapse or prone to more frequent blockages due to pipe defects. The program should also include regular visual and TV inspection of sewer pipes and a system for assessing and ranking the condition of sewer pipes. Finally, the rehabilitation and replacement plan should include a financial plan that properly manages and protects the infrastructure assets;	Prioritized list of defects been that require spot repair, rehabilitation or replacement to restore capacity. Program for short and long term repair, rehabilitation or replacement. ✓ Analysis of financial resources necessary to operate, maintain and execute short and long term repair, rehabilitation or replacement program identified and funded.	By Ordinance 3504, the City must annually evaluate its Sewer Service User Charge.	
(H) Provide training on a regular basis for staff in collection system O&M and monitoring and determine if contractors' staff are appropriately trained;	❑ Training program for City Operations and Maintenance staff and assurance of training by the contractors engaged by the city to for performance of O&M functions.	Operations Manager shall investigate requirement of Certification for existing and future employees. (Recommendation by June 1, 2003)	

E6.12

E6 . 13

WDR Reference	Deliverables	Notes	Due Dates
(I) Provide equipment and replacement parts inventories including identification of critical replacement parts.	❑ Inventory of replacement parts.	Maintenance Staff to provide Inventory to Engineering by January 1, 2003	
(J) Establish an implementation plan and schedule for a public education outreach program that promotes proper disposal of grease and fats.	❑ Public education program focused on reducing residential disposal of FOG	Engineering Staff to coordinate public outreach with recommendation by June 1, 2003.	
(K) In accordance with County of Orange's Drainage Area Management Plan, establish a plan for responding to SSOs from private property that discharge to public right of ways and storm drains, to prevent discharges from SSOs to surface waters and storm drains; and	✓ Established procedures to investigate (service request) and assist in the mitigation of discharges from private property.	SSO Emergency Response Plan currently details private property response.	
(L) Develop a plan and a schedule for providing an analysis of alternative methods of disposal for grease and fats, and an implementation plan and schedule for providing adequate disposal capacity for grease and fats generated within the sewer system service area. This plan shall include an evaluation of the feasibility of using sludge digesters at the OCSD treatment plant for grease disposal and treatment, recycling, and rendering, and other disposal alternatives.	❑ FOG program to monitor the maintenance of commercial, industrial, and institutional source control systems (grease interceptors, traps, skimmers,) maintenance and disposal of FOG from these sources.	City is currently participating both monetarily and as a member of the FOG Steering Committee, and will incorporate the tools developed from the study to establish appropriate control methods to reduce FOG in the collection system (See item viii.)	
(v) **Design and Performance Provisions:**	Ensure the following:		
(A) Develop design and construction standards and specifications for the installation of new sewers, pump stations and other appurtenances; and for rehabilitation and repair of existing sewer systems; and	✓ Design and construction specifications as well as inspection, based on current engineering and construction practices	The City currently maintains Supplemental Specifications to the "Standard Specifications for Public Works Construction" or better known as the "Green Book" as well as Design standards for its Sewer Infrastructure.	
(B) Develop procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and			

WDR Reference	Deliverables	Notes	Due Dates
repair projects.			
(vi) Monitoring, Measurement and Program Modifications (A) Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP; (B) Update program elements, as appropriate, based on monitoring or performance evaluations; and (C) Modify the summary of the SSMP program, as appropriate, to keep it updated and accurate and available for audit at all times.	☐ Annual evaluation and update of the SSMP.	Updates and evaluation to be performed by maintenance and engineering staff by amendment identifying any revisions to the SSMP.	Annual update due September 30, of each year.
(vii) Overflow Emergency Response Plan: The dischargers shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan should include the following: (A) Ensure proper notification procedures so that the discharger is informed of all SSOs in a timely manner (to the greatest extent possible) (B) Ensure that all overflows (including those that do not discharge to waters of the State) are appropriately responded to, including ensuring that reports of overflows are immediately dispatched to appropriate personnel for investigation and appropriate response;	✓ SSO Emergency Response Plan	City enacted Administrative Regulation 808 effective January 1, 2002, which describes the Sanitary Sewer Overflow Response Procedures.	SSO Emergency Response Plan due by January 1, 2003

E6.14

WDR Reference	Deliverables	Notes	Due Dates
(C) Ensure immediate notification to the public, health agencies and other impacted entities (e.g., water suppliers) of all overflows. Report all SSOs to the Regional Water Quality Control Board and the Orange County Health Care Agency, and report to the State OES if the overflow is 1,000 gallons or larger. The SSMP should identify the public health agency and other officials who will receive immediate notification;	✓ SSO Emergency Response Plan	City enacted Administrative Regulation 808 effective January 1, 2002, which describes the Sanitary Sewer Overflow Response Procedures. In addition, the City currently has on hand several portable generators for the express use of its 28 sewer lift stations.	SSO Emergency Response Plan due by January 1, 2003
(D) Ensure that appropriate staff and contractor personnel are aware of and follow the plan and are appropriately trained;			
(E) Provide emergency operations, such as traffic and crowd control and other emergency response; and			
(F) Take all reasonable steps to contain sewage and prevent sewage discharges to surface waters and minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.			
(G) Develop and implement a plan for the use of portable aerators where complete recovery of the sanitary sewer overflows is not practicable and where severe oxygen depletion in existing surface waters is expected.			
(H) Develop and implement a plan to respond in a timely manner to spills and other emergencies. Collection system staff should be able to respond to a sewage spill in less than an hour from the			

E6 . 15

WDR Reference	Deliverables	Notes	Due Dates
first call. The system should be capable of meeting this response time ay or night, every day of the week. The system must own or have ready access to spill and emergency response equipment such as vacuum trucks, hydroflushers, pumps, temporary bypass hoses, and portable generators.			
(viii) **Fats, Oils and Grease Control Program.** Prepare and implement a grease, fat, and oil source control program to reduce the amount of these substances discharged to the sewer collection system. This plan shall include the legal authority to prohibit discharges to the system and identify measures to prevent SSOs caused by fats, oils, and grease blockages of sewers. The elements of an effective grease control program may include requirements to install grease removal devices (such as traps, or preferably, interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements. An effective grease control program must also include authority to inspect grease producing facilities, enforcement authorities, and sufficient staff to inspect and enforce grease ordinance. (A) The grease control program shall identify sections of the sewer system subject to grease blockages and establish a cleaning maintenance schedule for each section; and (B) The program shall develop and implement source control measures, for all sources of grease and fats discharged to the sewer system, for each section identified in (A) above.	❑ FOG Control Program.	City is currently participating both monetarily and as a member of the FOG Steering Committee, and will incorporate the tools developed from the study to establish appropriate control methods to reduce FOG in the collection system. Upon release of Ph. 1 FOG Study, begin to evaluate "tools" with report to P.W. Director by June 1, 2003. Prepare "Draft" FOG Control Program incorporating Legal Authority and submit to P.W. Director by September 1, 2004	FOG Program due by 12/30/04
(ix) System Evaluation and Capacity	❑ Capacity Evaluation Plan, which	In the Summer of 2002, the City updated its	Capacity Evaluation

E6.16

WDR Reference	Deliverables	Notes	Due Dates
Assurance Plan: Prepare and implement a capital improvement plan that will provide hydraulic capacity of key sewer system elements under peak flow conditions. At a minimum, the plan must include: (A) **Evaluation.** Steps to evaluate those portions of the collection system, which are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events; (B) **Capacity Enhancement Measures.** Establish a short- and long-term capital improvement program to address identified hydraulic deficiencies including prioritization, alternatives analysis, and schedules; and (C) **Plan Updates.** The plan must be updated, at a minimum annually, to describe any significant change in proposed actions and/or implementation schedules. The updates should include available information on the performance of measures that have been implemented.	prioritizes CIP relative to sensitive environs.	Sewer Master Plan, which includes potential capacity deficiencies. (Engineering Staff to prepare a priority list by June 1, 2003 or sooner)	Plan due by 07/30/05

E6.17

WDR Reference	Deliverables	Notes	Due Dates
(x) **SSMP Program Audits.** As part of the SSMP, the permittee shall conduct an internal audit, appropriate to the size of the system and the number of overflows, and submit a report of such audit, evaluating the SSMP and its compliance with this subsection, including its deficiencies and steps to correct them.	❑ Report of Audit of SSMP with level of compliance and deficiencies, and programs to eliminate deficiencies.	Engineering Staff shall coordinate with maintenance staff to prepare the Audit by on an annual basis to be included with the annual update.	Annual update due September 30, of each year.
(xi) **Communications.** The discharger should communicate on a regular basis with interested parties on the implementation and performance of its SSMP. The communication system should allow interested parties to provide input to the discharger as the program is developed and implemented.	❑ Establish communication plan for the dissemination of requested information to interested parties.	Engineering Staff to recommend communication plan (by January 1, 2003)	

E6.18

INTENTIONALLY
LEFT
BLANK