GRATON COMMUNITY SERVICES DISTRICT

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Graton Community Services District
Sewer System Management Plan (SSMP)

Graton Wastewater Treatment Facility
May, 2023

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Introduction:

This section provides background information on the purpose and organization of the Sewer System Management Plan and includes a brief overview of the Graton Community Services District (GCSD/the District) service area and sewage treatment system.

SSMP Requirement Background

This SSMP has been prepared in compliance with requirements of the Regional Water Quality Control Board pursuant to Section 13267 of the California Water Code and State Water Resources Control Board Order Number 2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. Under this order, all public entities that own or operate sanitary sewer systems greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California are required to comply with the terms of the order.

The Order generally addresses sanitary sewer overflows (SSOs) which may cause a public nuisance, pollute surface or ground waters, threaten public health, adversely affect aquatic life and impair recreational use of or aesthetic enjoyment of surface waters. The Order requires that public entities take a proactive approach to system-wide operation, maintenance, and management of sewer systems through the creation of a Sewer System Management Plan, in order to reduce the number, frequency and/or severity of SSOs in order to decrease risks to human health and environmental degradation.

Graton Community Service Area and Sewer System Overview

GCSD owns and operates a disinfected, tertiary-treated municipal wastewater treatment facility located north of the town of Graton in west Sonoma County that collects, treats, and disposes of tertiary treated wastewater under the direction of the North Coast Regional Water Quality Control Board (RWQCB). The District operates under waste discharge requirements (WDR) for the collection, treatment and disposal of treated municipal wastes. With the exception of reclaimed water by GCSD for the purposes of agricultural irrigation, GCSD does not provide water to Graton area residents, who solely utilize private wells for drinking water.

GCSD is a small district providing wastewater treatment serving a population of approximately 1,700 residents[1], with 449 service connections in a rural residential community. The system is designed for the collection, treatment and disposal of 0.14 million gallons (average dry weather flow) per day, and currently has a flow of approximately 0.090 million gallons average dry weather flow per day. The GCSD collection system consists of approximately 6.5 miles of 6, 8, and 12-inch asbestos cement pipelines, and two lift stations.

SSMP Elements

1. Goals:

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

1. Minimize sanitary sewer overflows.
2. Prevent public health hazards.
3. Minimize inconveniences by responsibly handling interruptions in wastewater treatment service.
4. Protect the large investment in collection systems by maintaining adequate capacities and extending useful life.
5. Prevent unnecessary damage to public and private property.
6. Use funds available for sewer operations in the most efficient manner.
7. Convey wastewater to treatment facilities with a minimum of infiltration, inflow and exfiltration.
8. Provide adequate capacity to convey peak flows.
9. Perform all operations in a safe manner to avoid personal injury and property damage.
10. Enhance pollution prevention and source control by improving district- public communications through outreach and other public education endeavors.

2. Organization

Requirement: the SSMP must identify:

- a) the name of the responsible or authorized representative
- b) the names and telephone numbers for management, staff and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organizational chart or similar document with a narrative explanation; and
- c) the chain of communications for reporting sanitary sewer overflows(SSOs), from receipt of complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Boards and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board and/or State Office of Emergency Services (OES).

Graton Wastewater Treatment Plant
Physical Address: 250 Ross Lane, Sebastopol, CA 95472
(Located west of Ross Station Rd along the West County Trail: in unincorporated land north of Graton.)

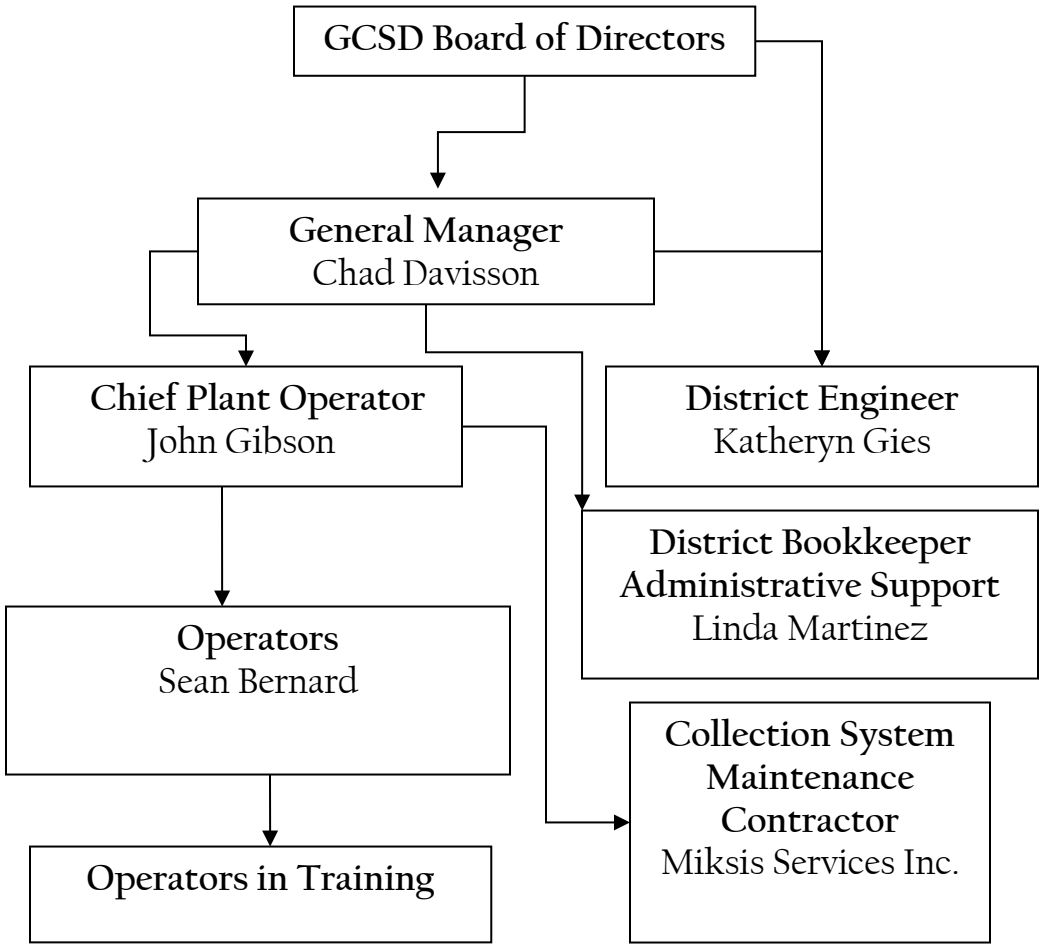
Mailing Address: PO Box 534 Graton, CA 95444
Phone: (707) 823-1542 District Office (24-hour number)

Lift Station #1
Physical Address: 3400 Ross Road Sebastopol, CA 95472
(located in unincorporated land north of Graton)
Phone/Alarm: (707) 823-8707

Lift Station #2
Physical Address: 3498 Ross Road Sebastopol, CA 95472
(located in unincorporated land north of Graton)
Phone/Alarm: (707) 823-0723

Legally Responsible Official
The legally responsible official (LRO) for the implementation and administration of the District's SSMP and for completing and certifying spill reports electronically is the Chief Plant Operator, John Gibson (707) 823-1542 office phone, (707) 591-5646 cellular phone.

Figure 1: Graton CSD Organizational Chart



Description of Staff Responsibilities

General Manager: Plans, organizes, directs and supervises the wastewater activities of the District; advises the Board of Directors on engineering and wastewater matters, including those related to the collection system. Prepares and Controls the District budget. GM reviews project plans and specifications for District projects and performs technical engineering planning studies. GM confers with District Engineer and officials of other entities.

District Engineer: Acts as project manager on wastewater projects, prepares plans, specifications, and preliminary cost estimates, coordinates and confers with District staff on sanitary sewer issues, confers with contractors, consultants, and the public on engineering and construction matters, prepares reports on wastewater projects.

Chief Plant Operator: supervises and personally assists in the cleaning and repair of sewer mains and lines and the location and rising of manholes, lays out and schedules work for crew. Trains crew members in specific tasks, as needed, including collection system preventive maintenance and SSO response. Checks work of assigned crew.

Operator: Works as a member of a field maintenance crew. Cleans, unplugs, and repairs sewer lines. Locates and raises manholes. Operates sewer cleaning power equipment. Trains crew members in specific tasks, as needed, including collection system preventive maintenance and SSO response.

Operator in Training (OIT): Works as a member of a field maintenance crew. Cleans, unplugs, and repairs sewer lines. Locates and raises manholes. Operates sewer cleaning power equipment. Under the direction of Operator and/or General Manager, as needed.

Collections Systems Maintenance Contractor: Cleans, unplugs, and repairs sewer lines. Locates and raises manholes. Operates sewer cleaning power equipment, closed circuit TV inspection equipment, and smoke / pressure testing devices. Maintains daily logs and inspection reports of district sanitary sewer systems.

District Administrative Assistant/Bookkeeper
Assists General Manager, coordinates board meetings, provides assistance with compliance and other reporting requirements, general office support. Maintains GCSD accounting, pays bills, coordinates payroll, integrates with County, provides financial reports and budgetary information for Board of Directors, General Manager, Administrative Assistant and Grant Writer

Authorized Representative
The District's authorized representative in all wastewater collection system matters is the General Manager. The General Manager is authorized to certify electronic spill reports submitted to the SWRCB.

The Chief Plant Operator is authorized to act in the General Managers absence.

The General Manager is authorized to submit SSO reports to the appropriate government agencies.

Responsibility for SSMP Implementation

The General Manager is responsible for implementing and maintaining all elements of this SSMP

SSO Reporting Chain of Communication

The chain of communication for responding to and reporting SSO's, from observation of an SSO to reporting the SSO to the appropriate regulatory agencies is shown in Section 4 of this SSMP: see Overflow Emergency Response Plan. The operator who receives notification of an SSO, initiates plan and notifies supervisor and all agencies, as per Overflow Emergency Response Plan.

3. Legal Authority

Requirement: Each wastewater collection system agency shall, at a minimum, describe its legal authority, through sewer use ordinances, services agreements, or other legally binding procedures to:

● Control infiltration/inflow (I/I) from satellite wastewater collection systems and laterals
● Require proper design and construction of new and rehabilitated sewers and connections
● Require proper installation, testing, and inspection of new and rehabilitated sewers

The Graton Community Services District (GCSD) was formed by the Sonoma County Local Agency Formation Commission. The sewer regulations were adopted by GCSD as Graton Sewer Ordinance 100, pursuant to provisions of the California Water Code. Section 1.01 describes authority, as shown below:

SECTION 1.01 - AUTHORITY: This regulation is adopted under authorization of Division 5, Comprising Sections 4700 through Section 4857 and Sections 5470 through 5474.10 of the Health and Safety Code of the State of California and California Government Code Section 54738, et seq. The legal authority needed to implement a pretreatment program is listed in 40 CFR 403.8 (f)(1).

- Illegal discharges are covered in Section 3.04. Violation enforcement is covered in Article VII.
- Sewer connection design and construction standards are outlined and covered in Article IV, Section 4.13.
- Easements agreements and rights of way for maintenance are covered in Section 4.14.
- Grease interceptor requirements are outlined in Article X, Section 10.01.
- Enforcement of any violation of the sewer regulation are outlined in Article VII Sections 7.01 through 7.21.
- User responsibility for maintenance of side sewer (sewer laterals) is described in Section 3.23 of the GCSD Sewer Ordinance 100.
- User responsibility for installation of backflow prevention devices are described in Section 3.24 of the GCSD Sewer Ordinance 100.

4. Overflow Emergency Response Plan

Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, this plan must include the following:

(a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
(b) A program to ensure an appropriate response to all overflows;
(c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The
SSMP should identify the officials who will receive immediate notification;
(d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
(e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
(f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United
States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

The Graton Community Services District developed a Spill Response and Notification Plan in order to provide clear standards for emergency response in the unlikely event of an overflow situation.

SUMMARY AND RECOMMENDATIONS

The Spill Response and Notification Plan defines the Graton Community Services District (GCSD) plans, procedures and requirements for responding, remediation and reporting spills from sewers and lift stations. The Spill Response and Notification Plan (SRNP) was developed for use in the GCSD sanitation facilities for sewer and lift station spills. The SRNP was developed to satisfy terms and conditions of the California Regional Water Quality Control Board, North Coast Region, NPDES Permit No. **CA0023639.**

The purpose of the SRNP is to assure a prompt and appropriate level of response is made to every reported sewage spill received by the District so that adverse effects to public health, water quality, the environment, and public and private property can be minimized. The SRNP further includes provisions to ensure notifications and reports are made to the appropriate

local, state and federal authorities, and that response actions taken by the District are properly documented. By responding promptly with adequate resources to sewage spills, and promptly providing regulatory agencies with required spill notification and spill reports, the risk of enforcement actions against the District can be minimized.

The core elements of the SRNP are the spill response procedures, and the regulatory agency spill notification and reporting requirements. The SRNP provides continuity between core elements, from the initial receipt of a spill notification through completion of the regulatory spill report. In addition to these core elements, the SRNP also addresses public notification procedures, public education, public outreach, resource sharing, mutual aid agreements, training and SRNP updating. These additional elements are essential to the maintenance and development of the SRNP.

Spill Response Assessment and Recommendations

The SRNP has attempted, where possible, to standardize the regulatory agency notification requirements for sewage spills. To avoid confusion in the future, the SRNP identifies the specific notification requirements of the regulatory agencies, including the North Coast Regional Water Quality Control Board, the Sonoma County Public Health Department, California and the California Department of Fish and Game.

Managing the various spill response activities was an area of concern. The response activities involve all District employees. The District has developed responsibilities for staff with respect to spill response. The SRNP strengthened these responsibilities by clearly defining the responsibilities of individuals in spill response activities and stressing communication during and following a spill. Additional spill documentation was also included in the SRNP. The SRNP includes aids for estimating spill quantities and rates were also included in the SRNP.

During normal working hours, the District has adequate on duty staff for spill response. Staff availability outside of normal working hours may limit spill response crew effectiveness in some situations. Of most concern are spills occurring in high traffic or residential areas, or spills requiring additional resources or equipment due their magnitude or location.

Wet weather spills are also a point of concern with respect to staff and equipment availability. Infiltration and inflow during wet weather can

increase sewer flows significantly. As a result, spills in wet weather are generally larger than dry weather spills and there is an increased potential for multiple spills to occur. To improve wet weather spill response, equipment and supplies can be deployed ahead of time to reduce response time to areas with known wet weather overflow potential.

Training is an important component of the SRNP. It assures that spill response and notification procedures and requirements are understood by the District staff involved in spill response activities.

In the area of public information, it is recommended that the District develop policies and procedures for issuing public information and notices. The SRNP includes suggestions for posting signs, issuing public advisories with respect to sewer spills. Development of standard District public information policies would help better define responsibilities for handling all District public information and notices.

The District has begun developing public outreach and education materials for its wastewater operations. The continued development of these public outreach materials to specifically address wastewater collection systems and spill response activities should be supported and encouraged by the District. This will foster a greater public awareness of the District's role and responsibility in wastewater management, and inform the public of activities that could impair the operation or performance of the wastewater treatment or the collection system.

Systems Operations and Maintenance

GCSD maintains its Operations and Maintenance Manual, field activity daily logs, construction drawings and collections systems maps. All of these documents are kept on file at the district office located at the Graton Wastewater Treatment Facility. GCSD regularly contracts with Miksis Services Inc. d.b.a. Rapid Rooter to conduct inspection and maintenance of the District's sewer lines.

Overflow Response Procedure

The Overflow Response Procedure presents a strategy for the GCSD to mobilize labor, materials, tools and equipment to correct or repair any condition which may cause or contribute to: 1) an unpermitted discharge to jurisdictional waters of the United States (surface water); and, 2) sewer overflows and lift station overflows to dry land which are successfully contained and present no threat to surface water. The plan considers a wide range of potential system failures that could create a spill to surface water. Section 2 provides a description of the procedural steps from receipt of a spill report through preparation of final spill event documentation.

Spills may result from blocked sewers, pipe failures, power outages or mechanical malfunctions among other natural and man-made causes. Maintenance and Operations Sections are on alert and shall respond immediately upon receipt of notification of a possible overflow.

The following overflow response procedures are presented:

- Receipt of Information Regarding a Sewer Overflow or Lift Station Overflow
- Dispatch of Appropriate Crews to Site of Sewer Overflow
- Response to Lift Station Failure
- Overflow Containment, Correction and Cleanup
- Additional Measures Under Potentially Prolonged Overflow Conditions
- Notification
- Reporting Spills to Waterways or Spills to Dry Land

Receipt of Information Regarding a Sewer Overflow or Lift Station Overflow

District employees or others may detect a sewer overflow. The District employee answering telephone calls dialed to "707-823-1542" is responsible for handling phone calls from the public on possible sewage overflows from the wastewater collection system and transmission system (e.g., sewer pipes and lift stations) and for notifying District personnel.

1) The employee that takes the call shall record as much information as possible that is known about the spill by the caller and other relevant

information regarding the overflow using the "Initial Report of Spill or Stoppage" form including:

- Time and date the call was received.
- Full name of reporting party.
- Phone number(s) of the reporting party.
- Additional contact information (Reporting party address, current location).
- Location of problem (Address, cross street).
- Time spill was noticed.
- Spill continuing or stopped.
- Description of spill, such as "Clean" water or sewage (debris, odor, etc.).
- Estimated volume (description of size of ponded water).
- Estimated flow (if continuing to flow).
- Description of downstream area (gutter, ditch, field, storm drain, etc. to determine if spill can reach a creek or waterway).
- Additional information.

2) The employee will also enter this information into the Operator's Daily Log, which is kept at the District Office.

3) If there is indication that the spill is running to a creek or storm sewer, the employee should immediately notify all available operators. Notification shall first be by telephone (using home or work number depending on the time of day, and day of the week). If no response is received within five (5) minutes of sending a page, text, or voicemail, the employee shall notify the next operator in descending order on the telephone/contact list kept at the Plant Office and answering service for emergency and spill response.

4) Sewage overflows detected by any District personnel in the course of their normal duties shall be reported immediately to the other Operator by telephone.

5) Until confirmed by a District staff member, the reported possible spill or overflow should not be referred to as a "sewage overflow" or "unpermitted discharge."

Dispatch of Appropriate Crews to Site of Sewer Overflow

The purpose of immediate response to a failure of any element within the wastewater collection and lift station systems is to isolate and correct the problem. Collection system and lift station sewage spills will be given a high priority for crews and equipment. Also, available operations and maintenance personnel, materials and equipment shall be called in if extra resources are needed.

1) Dispatching Crew

The District shall direct the appropriate crew, materials, supplies, and equipment to be deployed. The District shall dispatch the crew by direct contact, mobile radio, or telephone or will request the Secretary to make direct contract. All employees dispatched to the site of a sewage overflow shall proceed immediately to that site. Any delays or conflicts in assignments must be immediately reported to the Coordinator for resolution. The Coordinator will be the General Manger or Lead Operator. If they are unavailable, report to a member of the GCSD Board of Directors.

If the reported spill has reached surface water, or may reach surface water, the District will dispatch a Wastewater Operator to the spill site for sampling. Before arriving at the spill site, the Wastewater Operator shall obtain sample bottles and equipment needed to conduct the required sampling.

The Secretary or other personnel communicating with the responding crew shall ensure that the entire communication is received and acknowledged. To avoid delay, all standard communications procedures shall be followed.

Responding crew shall report their findings, including damage to private and public property, to the District with updates as frequently as necessary to keep him/her abreast of the conditions. Photographs shall be taken and labeled where a spill has been documented, and samples shall be taken when appropriate.

The District and Secretary shall assist, as necessary, to transfer all pertinent information to the Operators, including any details of the problems and observations described by the person who initially reported the spill, and the status of ongoing corrections, repairs and cleanup. Spill response personnel being relieved by other operators shall discuss the problems, observations, conditions and the status of ongoing corrections, repairs and cleanup. The names of contacts and notifications made by the spill response crew shall also be provided to relieving crew.

2) Additional Resources

Based on the information provided by the responding crew, the District shall directly call for additional support if needed.

3) Field Supervision and Inspection

The District or other Wastewater Operators should periodically visit overflow sites during all phases of the spill response, if possible, to assure that provisions of this overflow response plan and other directives are met. If possible, the District Operator should visit the site at least once during a major spill event. This will also assist in the spill event debriefing and the assessment of need for revisions and updates to the SRNP. Operator safety shall be the first priority and concern at all times.

The District shall be responsible for confirming that the information for purposes of completing the Wastewater Stoppage/Overflow Report has been collected. The responding operators shall provide a description of the cause of the spill to the appropriate reports for a lift station overflow.

4) Coordination with Hazardous Material Response

If the responding crew members encounter a suspicious substance or odor (e.g., oil sheen, foamy residue, gasoline) on the ground surface, or surface water not common to the sewer system, the District shall contact the Graton Volunteer Fire Department and the County of Sonoma's Hazardous Material Response Team. The responding crew shall await the arrival of the Hazardous Material Response Team to possibly take over the scene.

Remember that any vehicle engine, portable pump or open flame (e.g., cigarette lighter) can trigger an explosion or fire where flammable fluids or vapors are present. Keep a safe distance and observe caution until assistance arrives.

The responding crew shall also take measures to assist in keeping the general public away from the impacted area. Perimeter control of the spill area to pedestrian and vehicular traffic shall be established using traffic barricades, barricade warning tape, or temporary barrier/safety fencing with signage, "Caution Do Not Enter" where appropriate.

Upon arrival of the hazardous material response team, the responding crew shall take direction from the HAZ-MAT lead person. Only when that lead person determines it is safe and appropriate for the responding crew to proceed under the SRNP with the sewer overflow containment, correction and clean-up activities, shall the responding crew proceed.

Response to Lift Station Failure

GCSD personnel shall follow the procedure outlined below whenever a lift station fails.

Overflow Correction, Containment, and Cleanup

This section describes specific actions to be performed by the responding crew during a sewer overflow or lift station overflow.

The objectives of these actions are to:

- Protect public health, environment and property from sewage spills and restore the surrounding area back to normal as soon as possible.

- Establish perimeters and control zones with appropriate positioning of traffic cones and barricades, service vehicles, or use of natural topography (e.g., hills, berms, embankments) and mounded soil and sandbags.

- Promptly notify regulatory agencies' communication centers of preliminary spill information and potential impacts.

- Contain the sewer overflow to the maximum extent possible including preventing the discharge of sewage into surface water.

- Minimize the District's exposure to any regulatory agency penalties and fines, and other legal actions.

- Follow safe work practices.

Under most circumstances, the District will handle response activities with its own work forces. The District's Operators possess the skills and experience to respond rapidly and in the most appropriate manner. An important issue with respect to an emergency response is to ensure that the temporary actions necessary to divert flows and repair the problem do not produce problems elsewhere in the system. For example, the repair of a force main could require the shutdown of the lift station and possible diversion of the flow at an upstream location, or temporary storage in the wet well or upstream inlet piping. If the shutdown is not handled properly, sewage backup may create new spills.

Circumstances may arise when support from an outside construction contractor is required. This could occur when a deep and large diameter pipe requires an emergency repair in order to resolve the overflow and extensive shoring is necessary.

The first responsibility when arriving at the site of a sewage overflow is to protect the public health and safety by mitigating the impact of the overflow to the highest extent possible. The District shall take responsible actions to protect public health and water quality where the overflow is caused by facilities within the District's jurisdiction, or has been damaged by others resulting in a stoppage and backup into buildings, or overflows at private laterals. However, should the cause of the overflow not be the District's responsibility (e.g., an overflowing private sanitary sewer), but there is severe and imminent danger to public health, public or private property, or water quality, the District may take prudent emergency action until the owner can take control of the overflow.

Upon arrival at an overflow from the public sewer, the responding crew shall do the following:

- Take immediate steps to stop the overflow (e.g. relieve pipeline blockage, manually operate lift station controls, repair pipe, etc). Extraordinary steps may be considered where overflows from private property threaten public health and safety (e.g., an overflow running off of private property into the public right-of-way). Extra care should be taken in securing the work site immediately adjacent to or around private property.

- Request additional personnel, materials, supplies or equipment, as necessary that will expedite containment and minimize the impact of the overflow.

- Determine the cause of the overflow, e.g. sewer line blockage, sewer line break, lift station mechanical or electrical failure, or inadequate capacity, etc.
- Identify and request, if necessary, assistance or additional resources to correct the overflow or to assist in the determination of its cause.
- Determine if private property has been impacted. If private property is affected notify the property owner, resident or business by direct contact. If direct contact cannot be made, leave message at the residence or business to contact the District. Include property owner contact information on the Operator Incident Report. Take photographs and make careful notes of conditions – Identify witnesses.

1) <u>Documentation of Spill Conditions and Actions</u>

The maintenance crew dispatched to the spill site shall complete a Maintenance Crew Report of Spill or Stoppage form to document conditions and actions taken (See Appendix A). The required information includes:

Name(s) of reporting party

a. Date and Time of arrival
b. Exact Location of the spill
c. Type of spill or stoppage
d. Estimated volume
e. Estimated flow rate
f. Description of downstream impacts
g. Spill documentation information
h. Time spill stopped
i. Time cleanup completed and description of cleanup activities
j. Time crew left site
k. Time, name, and nature of any regulatory agency and District management notifications made by the maintenance crew.
l. Spill impact boundaries.
m. Cause of spill

n. Other information as appropriate

o. Dated photograph

The completed form shall be kept at the District office and retained per the GCSD retention schedule

2) Document Damage to Private Property

The objective is to rapidly resolve the immediate cause of the overflow and contain it to avoid or minimize damage to property and the environment. The responding crew shall use discretion in providing assistance to a property owner/occupant who has sustained property damage. Responding District personnel should be aware that the District could face increased liability for any further damages caused to private property during such assistance. The responding crew should not enter private property for purposes of assessing damage unless directed otherwise by a District. Responding crews should take still photographs, if possible, of the impacted outdoor area of the sewer overflow in order to thoroughly document the nature and extent of damage. The responding crew shall forward the photographs, negatives or videotapes to the District for filing with a copy of the Operator Incident Report as appropriate.

- **Spills that enter private property but originate from District facilities or are caused by District facilities**

  Crews should be clearly identified as representing GCSD and have proper identification available. If possible, the owner or resident should also be contacted before entering private property.

  Crews responding to spills should use discretion in providing assistance to a property owner/occupant who has sustained property damage as the District could face increased liability for any further damages caused to private property during such assistance.

  Permission should also be obtained from the property owner or resident if possible. Damage should be documented for outdoor areas. District staff should not enter the private property residence for cleanup or documentation.

- **Spills that originate from private property and are not caused by an District owned facility or sewer**

  The District staff should not provide assistance, spill control, or cleanup unless there is a severe and imminent danger to public health, public or private property, or water quality. For example, severe danger might be a private property spill flooding a nearby private property residence. In such cases, the District staff should try to minimize any private property damage from the spill containment, or control actions taken.
  Example:
  - Sewage on lawn, no apparent damage.
  - Sewage on lawn and landscaping: removed contaminated redwood bark during cleanup.

  Photos should be taken of private property damage and included in documentation.

Contact with Property Owner or Resident

Whenever possible, obtain information from the owner or resident and witnesses:

- Name
- Phone
- Address
- Date and Time
- Conditions

<u>If an overflow occurs, the responding crew shall take the following measures:</u>

1) Initial Measures for Containment
   - Take immediate steps to contain the overflow, e.g., block or sand bag storm drains, recover through vacuum truck, divert into downstream sanitary sewer manhole, to minimize the impact to public health or the environment.
   - Determine the immediate destination of the overflow, e.g. storm drain, surface water, ground surfaces, structure, etc.

- Identify and request the necessary materials and equipment, such as sandbags, hay bales, plastic sheeting, vacuum trucks, or portable pumps and hoses, to contain or isolate the overflow, if not readily available.

2) Additional Measures Under Potentially Prolonged Overflow Conditions
In the event of a prolonged force main failure, gravity sewer line blockage or collapse, or lift station outage, the staff personnel shall determine if a portable pump-around operation to direct flows around the defective or damaged facility is needed. If needed, the District shall take the necessary steps to obtain the personnel and equipment for the pump-around operation. Personnel shall be trained in proper portable pump capacity selection and the setup of temporary suction and discharge piping to assure safe and reliable emergency operation. The District can be consulted to determine the proper size and number of portable pumps required to effectively handle the sewage bypass pumping operation.

During pump-around operation, the crews shall monitor the bypass pumping operation. The District shall be informed of the prolonged pumped bypass situation (e.g., need for redundancy of portable pumping, periodic follow-up notification until the lift station is returned to normal operation) to address regulatory agency issues in conjunction with emergency repairs.

Other methods of control shall be utilized when appropriate, such as fluming and berming to contain flows while repairs are made.

3) Cleanup

Sewer overflow sites including contaminated soil, stream and riverbanks, and shorelines of other types of bodies of water, shall be thoroughly cleaned after an overflow. Solids and other debris shall be flushed, swept, raked, picked-up and transported to proper disposal area. No readily identifiable residues (e.g., fecal matter, rags, papers, or plastics) shall remain.

Where practical, the area shall be thoroughly flushed and the wash-down water shall be contained and properly disposed of. Be aware that heavy flushing could make containment of washdown water impractical or not possible.

The overflow site shall be secured to prevent contact by the public until the site has been thoroughly cleaned. This may require signage and/or barricades.

In restricted conditions, the overflow site shall be disinfected and deodorized following cleanup of the site. Disinfection and deodorization should be conducted only at the direction of the Sonoma County Public Health Department, the RWQCB. The disinfectant and any washwater shall be collected and returned to the sewer or a treatment plant.

Where sewage has resulted in ponding, the pond shall be pumped, if practical.

Other measures as directed by the public health officer.

Notification

The Regional Water Quality Control Board, California State Department of Health Services, Sonoma County Public Health Department, California Office of Emergency Services, the California Department of Fish and Game, and the California Highway Patrol require spill notification for various spill conditions and severity. The development of the regulatory agency spill notification requirement is discussed in Section 5. In addition to required regulatory agency notification, additional notification may be warranted to advise the public, downstream water users, and other District personnel. The following spill notification procedures will be followed.

A. The District shall notify the following agencies using the following guidelines:

- The North Coast Regional Water Quality Control Board:

    1. Immediate verbal notification (telephone) for any spill to surface water, and all spills exceeding 1,000 gallons.

    2. Verbal (telephone) notification within 24 hours for spills between 5 and 1,000 gallons that do not enter surface water.

    3. No notification required for spills less than 5 gallons unless directed otherwise by NPDES permit.

- The California Office of Emergency Services:

    Requires immediate verbal notification for a spill exceeding 1,000 gallons.

- The Sonoma County Public Health Department:

    Requires immediate verbal notification when a spill has the potential to affect public health (reaches surface water, spills on

private property, spills in or near parks, schools, hospitals or other high public traffic areas).

- California Department of Fish and Game:

  Requires immediate notification for spills in any amount to surface water or storm drains leading to waterways.

- California Department of Health Services:

  Requires immediate notification to OES for spills exceeding 1,000 gallons.

- California Highway Patrol:

  Requires immediate verbal notification of spills on state highways. Refer to Appendix B for contact phone numbers.

B. The District shall notify the people listed on the Emergency Telephone List (See Figure 2) of a collection system spill of 5 gallons or more, a spill of any size impacting surface water, chemical release, or major discharge violation. The On-Call Operator shall be responsible for notifying the District.

   The District shall determine the need to issue a public advisory notification and shall issue the public advisory notification as necessary. Staff should provide recommendations regarding the issuance of the public advisory notification.

C. The District shall complete an Operator Incident Report within 24 hours of the reported spill confirmation. The Operator Incident Report shall be submitted to the RWQCB. Section 2 summarizes, in part, the regulatory notification and reporting requirements. Similar to overflows from collection systems, notification of a lift station spill is received by the District Office from staff personnel. The District or On-Call Operator shall initiate the investigation and correction of the cause of the spill. The District will coordinate any spill cleanup and communicate to the appropriate agency if the spill reached surface water or a storm drain.

Table 1 – Spill Categories and Definitions

CATEGORIES	DEFINITIONS [see Section A on page 5 of Order 2006-0003-DWQ, for Sanitary Sewer Overflow (SSO) definition]
CATEGORY 1	Discharges of untreated or partially treated wastewater of **any volume** resulting from an enrollee's sanitary sewer system failure or flow condition that: • Reach surface water and/or reach a drainage channel tributary to a surface water; or • Reach a Municipal Separate Storm Sewer System (MS4) and are not fully captured and returned to the sanitary sewer system or not otherwise captured and disposed of properly. Any volume of wastewater not recovered from the MS4 is considered to have reached surface water unless the storm drain system discharges to a dedicated storm water or groundwater infiltration basin (e.g., infiltration pit, percolation pond).
CATEGORY 2	Discharges of untreated or partially treated wastewater of **1,000 gallons or greater** resulting from an enrollee's sanitary sewer system failure or flow condition that **do not** reach surface water, a drainage channel, or a MS4 unless the entire SSO discharged to the storm drain system is fully recovered and disposed of properly.
CATEGORY 3	All other discharges of untreated or partially treated wastewater resulting from an enrollee's sanitary sewer system failure or flow condition.
PRIVATE LATERAL SEWAGE DISCHARGE (PLSD)	Discharges of untreated or partially treated wastewater resulting from blockages or other problems **within a privately owned sewer lateral** connected to the enrollee's sanitary sewer system or from other private sewer assets. PLSDs that the enrollee becomes aware of may be voluntarily reported to the California Integrated Water Quality System (CIWQS) Online SSO Database.

Change in Lead Agency

In some sewer spills, a regulatory agency may identify itself as the lead agency. As lead agency, it will direct the actions to control, cleanup, and issue spill notification. The following shall be done when a regulatory agency takes the lead:

- The District shall be notified immediately.
- The District shall contact the lead agency to identify the District's liaison contact. In most cases, the General Manager or his designated operator will be the District's contact.
- The District will notify the staff personnel and the spill response crew that a regulatory agency has announced itself as the lead agency.
- The District Office shall notify other regulatory agencies that another agency has taken a lead role in the spill response.

Reporting

Information regarding the sewage overflow shall include the following:

- Indication of whether there was an actual observation of a sewer line overflow or lift station overflow running into surface water, or whether there was only evidence (e.g. sewage residue on the ground surface leading to the surface water) that sewage had possibly flowed to surface water, but was not actually observed.
- Indication that the sewage overflow had not reached surface water. Guidance in characterizing these overflows to include:
    a) Sewage spills to underground storm drains (with no public access) where a crew verifies, by inspection, that the entire volume is contained in an impoundment and where complete cleanup occurs, leaving no residue.
    b) Spills where observation, or on-site evidence, clearly indicates all sewage was retained on land and did not reach surface water, and where complete cleanup occurs leaving no residue.
- A determination of the start time of the sewer overflow using one of the following methods:
    a) Date and time an overflow report was received by the District Office.
    b) Date and time of a visual observation by a District employee.
    c) Lift station flow charts and other recorded data.
- A determination of the time that the sewer overflow ceased using the following criteria:
    a) When the blockage is cleared and flow is totally contained within the sewer without further aid or District action.
    b) Visual observations of no overflowing sewage.
    c) Upon return to normal lift station operation.
- An estimate of the rate of sewer overflow or lift station overflow in gallons per minute (gpm) by direct observation of the overflow. See Appendix C for flow estimation aids.
- A determination of the volume of the sewer overflow or lift station overflow:
    a) When the rate of sewer overflow or lift station overflow is known multiply the duration by the rate of flow to determine the volume of the overflow.

b) When the rate of overflow is not known, investigate the surrounding area for evidence of ponding, obtain dimensions of ponding and calculate volume in gallons. Total volume divided by the appropriate time interval will provide a flow rate.

- Photographs of the event when possible.
- An assessment if the spill is on private property. District personnel shall not enter private property, unless directed by the District for documenting the extent of the spill.

Customer Satisfaction

The District confirming the reported sewage overflow shall attempt to place a follow-up telephone call to the customer(s) or other parties reporting the incident. The District may delegate the responsibility to other District staff. The District should be prepared to provide information on the cause of the spill, volume and destination of the spill, repairs, cleanup measures and if any follow up is required (e.g., completion of permanent repairs or restoration, more frequent sewer line cleaning).

Notification:

Upon notification Graton Community Services District operators will respond to the alleged sanitary sewer system overflow (SSO) site within one half hour. The operator will call back the person who reported the SSO to confirm that the call was received and that staff are en route to the location.

Response:

Upon arrival to the SSO location the operator will evaluate the situation and check upstream and downstream to investigate the blockage. The operator will then notify the appropriate personnel.

Reporting:

Spill Notification, Certification and Reporting Procedures:

Spill Notification must be given by telephone to a live person from the following Agencies as soon as possible, **but no later than two hours after becoming aware of a spill**.

We must also certify in writing that we have made the following notifications **within twenty-four hours after becoming aware of a spill.** Print a copy of out //GCSD/Reports/SSO/Blank Reporting Certification Letter.doc prior to making the notification calls, fill in the required information, sign the bottom and submit in person during business hours, or by FAX 523-0135 if after hours or on weekends.

1. Office of Emergency Services (OES) – (800) 852-7550 – 24 hour number - write down the time and date of call, operator's name answering your call, and the control number assigned by OES and reference it in all following calls.

2. Environmental Health Services Division, County of Sonoma – Health Services – 565-6565 Terry Macute (mah-coo-tay) is the contact person during business hours. For after hours and weekend reporting, call REDCOM non-emergency number 568-5933 and ask to be connected to the on-call environmental health services staff person for reporting sewer spills.

3. Regional Water Quality Control Board – Main Office (707) 576-2220 – inform operator that you are giving notification of a Sanitary Sewer Overflow (SSO) and that Cathy Goodwin (576-2687), is our contact during business hours. If she is not in, ask to be connected to another staff member to report the spill. After hours or during weekends, follow the instructions on the phone message. Information to be provided verbally to the RWQCB includes

- Name and contact information of the caller;
- Date, time and location of the spill;
- Estimates of spill volume, rate of flow, and spill duration;
- Surface water bodies impacted, if any;
- Cause of spill;
- Clean-up actions taken or repairs made; and
- Responding agencies

Within 5 business days, submit a written report to the Regional Water Quality Control Board documenting the above certification information, and any additional details related to the cause of the spill, corrective action taken, a detailed description of the event, as well as copies of reports submitted to other agencies.

In addition, an electronic spill report must be filed online with the California Integrated Water Quality System (CIWQS). The URL for CIWQS is http://ciwqs.waterboards.ca.gov/.

The timeline for the submission of this report is within 3 business days of the spill.

Impact mitigation

Graton CSD engages in strategic preventative maintenance of the sewer collection system including video inspection as described in Section 6 of this plan as a pro-active approach to reducing SSO events. In the unlikely event of an SSO occurrence, preventative measures may be necessary to assure that no contaminants enter surface waters, ground water or the waters of the State. Graton CSD Staff and/or approved contractor shall remain on site and apply barriers around storm drains, evacuate spills or ponding through pumping out and redirecting sewage back into the collection system manhole, if necessary.

Figure 2: EMERGENCY TELEPHONE LIST

GCSD Office and Staff

GCSD District Office and Treatment Plant (24-Hour) 1-707-823-1542

Chief Plant Operator, John Gibson 1-707-591-5646 (Cell)

GCSD General Manager, Chad Davisson 1-925-727-2938 (Cell)

Fire, Paramedics, Police 911

Graton Volunteer Fire Department 1-707-823-8400

Regulatory Agencies

North Coast Regional Water Quality Control Board (Justin McSmith) 1-707-576-2082
Health Department-State of California 1-714-558-4410
Sonoma County Public Health Department 1-707-961-2714
Calif. Department of Fish and Game, Management Dist. 1-707-944-5500

Disaster Services

Governor's Office of Emergency Services 1-800-852-7550
Sonoma County Office of Emergency Services 1-707-459-7469
Federal Emergency Management Agency (FEMA) Disaster Information Hotline, 1-800-525-0321
Earthquake Information 1-800-286-7233

Wastewater/Water Assistance Agencies and Vendors

Miksis Services MSI Rapid Rooter 707-433-8053

Mendocino Coast Plumbing 707-882-2628

North Gualala Water 707-884-3579

North Coast Sanitary (Pump Truck) 707-884-1095

5. Fats Oils and Grease (F.O.G.) Control Program

Cleaning and Inspection Services

- Documented cleaning of collections system and schedule sections of the collections system so that entire system is cleaned once every 5 years (32000 ft system estimate, 6400 ft/year). Cleaning documentation should capture same or greater level of detail as previous reports.

- Lift Station Cleaning: Lift Station 1 pressure wash and vactor, minimum once a year.
- Pumps: pull and check monthly or as needed by Operators. Manually remove scum and grease from pump and wet well at lift stations, as needed.
- Video inspection and smoke testing: Perform on lines that show signs of structural damage (rocks, roots, infiltration), then on other lines so that entire system is video inspected once every 10 years (3200 ft/year, 800 ft/quarter). Written damage repair estimates based on inspection data.

Investigative services

- Manholes are inspected systematically with mainlines using video and smoke testing along with visual observations to evaluate safety and structural integrity, inflow and infiltration investigations (including smoke testing for illegal connections and infiltration identification).
- Laterals are inspected by video and smoke testing at time of/or prior to property transfer, per GCSD Sewer Ordinance 100. Inspection includes determination of presence of backflow prevention device.

Each grease interceptor shall be maintained:

● by removing the entire contents of the interceptor each time the interceptor is pumped.

● to ensure proper operation, maintenance and performance.

- at a minimum pumping frequency of once per three-month period, or more frequently to ensure that the facility discharge does not cause or contribute to a grease related collection system blockage which could result in maintenance requirements and/or a sewage spill.

- through pumping by an approved food handling facility waste grease hauler.

Manifests for pumping shall be kept on site of wastewater treatment facility district office and may be inspected, as needed.

6. Wastewater Collection System Maintenance

Activities to assure correct functioning of the sewer system include video inspection and cleaning sections of the collection system so that the entire system is serviced once every 5 years.

GCSD is establishing protocol for repairs and systems maintenance to include having trained staff on site in order to provide contractor oversite and improve communications between district staff and sewer pipe maintenance contractors such that each is clear on their respective role and responsibility during and following a repair or maintenance activity.

7. Design and Construction Standards

GCSD adopted the design and construction standards for sanitation facilities of the Sonoma County Water Agency; the public entity previously responsible for handling sewer flows prior to the formation of the Graton Sanitation Zone and the GCSD. The standards were formally adopted through GCSD Resolution #22 on May 15, 2006. See the attached Design Standards[2] and Resolution. Sonoma County Permit and Resource Management Department (PRMD) utilize these same standards and conducts construction inspections of any collection system including laterals developed within the District's boundary. The district does not expect to revise the adopted design and construction standards of the sewer collection system.

1. Graton Community Services District Median Household Income Survey Final Report March 20, 2018.

2. Graton Community Services District / Sonoma County Water Agency Design and Construction Standards for Sanitation Facilities

8. Capacity Management

The Graton Community Services District has developed tools for Collection Systems Operations and Maintenance (CMOM) program in order to describe and track changes to the district's boundaries and support effective daily operations. CMOM tools include the following and are available for review at the District office:

1. District Maps in half-size reduced scale (11X17 format)
    - Sphere of influence at 1"=500' scale with key to sub area maps
    - Sub-area maps at 1"=100' scale
2. Collection System Capacity Analysis
    - Flow Routing
    - Line Capacity Analysis
    - Parcel ESD Inventory

9. Monitoring Activities for Program Effectiveness

The Enrollee shall:
(a) Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
(b) Monitor the implementation and, where appropriate, measure the effectiveness of
each element of the SSMP;
(c) Assess the success of the preventative maintenance program;
(d) Update program elements, as appropriate, based on monitoring or performance
evaluations; and
(e) Identify and illustrate SSO trends, including: frequency, location, and volume.

MAINTAIN RELEVANT INFORMATION/IDENTIFY TRENDS
GCSD tracks numerous performance measures of the district's sewer system, including the following:
- daily flows from the collection system
- daily pump hours at the lower town lift station
- daily pump hours at the WWTP

- available free board in treatment ponds
- available free board in holding ponds
- monthly tests for BOD and TSS
- SSO records (including reports and response documentation)
- maintenance records
- repair records
- weather records including rainfall amounts and storm forecasts

These measures of the district's sewer system are evaluated by the Chief Plant Operator to determine whether there are any trends pertaining to SSO which might indicate a need for a rehabilitation or replacement project. In addition, on a monthly basis, the Chief Plant Operator generates and submits Self-Monitoring Reports to the Regional Water Quality Control Board pursuant to WDR 86-86 submits monthly SSO-related reports to the State Water Resources Control Board pursuant to WDR Order 2006-0003-DWQ annual SSO reports to the RWQCB. The Chief Plant Operator regularly discusses these reports regularly with the General Manager. GCSD plans to continue tracking performance measures that are currently tracked.

The Chief Plant Operator periodically reviews the district's preventative maintenance activities to assess their effectiveness and relevance. This review will include, but not necessarily be limited to:

- a review of any SSOs, if any, including volume, cause and response time
- inspection overview and results
- preventative maintenance schedule and any backlogs
- completed projects
- planned projects

The Chief Plant Operator checks in with the General Manager on at least a weekly basis (or more frequently, if necessary) to identify potential areas needed for improvement, based on the above review. Verbal progress reports summarizing these meetings and any recommendations for changes are regularly provided to the General Manager.

In addition, to monitor the effectiveness of the SSMP, GCSD has selected certain specific parameters that can be documented and compared on an annual basis. Changes in these parameters over time will indicate the overall success of the SSMP or, conversely, underlying conditions that can be

investigated further. The SSMP monitoring parameters of program effectiveness are shown in the following:

Figure 3 - SSMP Monitoring Parameters, by SSMP Element

SSMP Element	Summary of Element Purpose	Actions or Measures of Tracking Effectiveness
Goals	Reduce Overflows	No Action Needed
Organization	Establish a structure and assign responsibility within the organization	Review, update and adjust based on organizational changes
Legal Authority	Ensure the District has sufficient legal authority to properly maintain the sewer system	Modify as needed
Operation and Maintenance Program	Minimize blockages and reduce SSOs by properly maintaining the system and keeping the system in functional condition	● Total number and volume of SSOs ● Number of repeat SSOs ● Total number of mainline blockages ● Length of pipe cleaned ● Length of pipe CCTV'd and inspected ● Length of mains replaced
Design & Construction Standards	Ensure any new or repaired facilities are properly designed and constructed	Modify as needed

Overflow Emergency Response	Provide timely and effective response to SSMP emergencies and comply with regulatory reporting requirements	● Response time ● Non-scheduled work ● Monthly trend analysis Fats, Oil & Grease Control Minimize blockages due to FOG ● Number of blockages, if any, due to FOG ● Number of SSOs, if any,due to FOG
Capacity Management	Minimize SSOs due to insufficient hydraulic capacity	● Number of SSOs, if any, due to hydraulic capacity limitations ● Number of SSOs, if any, due to wet weather
Monitoring, Measurement and Program Modifications	Evaluate effectiveness of SSMP, keep SSMP updated, and identify necessary changes	As needed
Program Audits	Review the program effectiveness and make necessary changes to comply with the requirements	As needed/ proposing a formal audit every five years.
Communication Program	Evaluate the effectiveness of communication and identify necessary changes	As needed

Program Modifications

GCSD's SSMP will be modified to include operations changes that affect the SSMP elements. GCSD will review the successes and needed improvements of the SSMP as part of the program audit.

GCSD staff will update critical information, such as cell phone numbers, contact information and all other SSO response change of communication information as needed. A comprehensive SSMP update will occur every 5 years, as required by the NCRCB. Major changes proposed for the SSMP will be presented for approval to the GCSD's Board of Directors at duly noticed public meetings.

10. SSMP PROGRAM AUDITS

As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on
evaluating the effectiveness of the SSMP and Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

GCSD SSMP PROGRAM AUDIT
GCSD will audit and update its SSMP every five years or more frequently, if necessary. The audit process is documented in the SSMP Audit form, a copy of which is included on the following pages. The audit form provides a structure for a systematic review of each SSMP element to ensure the SSMP contains current information, regulatory requirements are satisfied, and programs are effective. If updates or changes are required, the content and timeline to complete those changes are described in the audit form.

11. Communication Program

The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented. The

Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

GCSD regularly communicates with the public on a wide-range of district matters. GCSD has and will continue to publicly communicate its efforts to maintain and improve the sewer system because effective communication promotes cooperation and support from our customers. GCSD's goal is to communicate with enough frequency and with enough pertinent information so that the SSMP is fully supported by our customers and the public is aware of the district's efforts to reduce and eliminate SSOs. The success of this SSMP is vital to the protection of public health, the environment and the water quality of the region. In addition, it is critical that local resident sewer users understand that wastewater collection system improvements will be needed from time to time to ensure the operational efficacy of our system and maintain the historically low rate of SSOs that is characteristic of GCSD's sewer system.

GCSD's General Manager shall be responsible for ensuring that the district communicates with the public on a regular basis about its sewer system. This communication takes place via the regular monthly meetings of the Board of Directors where the Board and public are extensively updated on operational issues concerning the sewer system and other major developments. The meetings are duly noticed public meetings and open to the public. Operations staff continues to engage with community members on a regular basis by hosting and participating with outreach events such as the annual "Graton Day" and by hosting tours of the wastewater treatment facility. Source control and pollution prevention matters are regularly discussed in an informal manner at these outreach events. The district also communicates with its customers via a newsletter and via the district's website. Members of the public are encouraged at all times to provide input to the district concerning the sewer system and the SSMP.

Draft Sewer System Management Plan Audit Form

The purpose of the SSMP Audit Form is to evaluate the effectiveness of the SSMP and to assist the District with identifying any needs for improvement to the sewer system management plan. The District expects to conduct periodic audits of the SSMP every two years in an effort to continue to provide an updated and relevant plan that will best serve the goals of the District.

ELEMENT 1- GOALS	YES	NO
• Are the goals stated in the SSMP still appropriate and accurate?		
ELEMENT 2- ORGANIZATION		
• Is the organizational chart current and accurate? • Are the staff and emergency numbers current and accurate?		
• Is the SSO chain of communication list still accurate?		
• Are the names on the emergency notification list current?		
ELEMENT 3- LEGAL AUTHORITY		
Does the SSMP reference GCSD sewer regulations documenting legal authority to:	Yes	No
• Require proper design and construction of sewers and connections		
• Prevent illicit or illegal discharges?		
• Ensure access for maintenance, inspections, and/or repairs for sewer lines and district owned laterals?		
• Enforce any violation of its sewer regulation(s)?		
ELEMENT 4- OPERATIONS & MAINTENANCE		
Collection System Maps		

• Does the SSMP reference the current process for maintaining the collection system maps and As-Builts for new construction?		
• Are the District's sewer collection system maps complete, current and sufficiently detailed?		
Resource and Budget • Does GCSD allocate sufficient funds for the effective operation, maintenance, and repair of the sewer collection system and is the current budget structure documented in the SSMP?		
Prioritized Preventative Maintenance • Does the SSMP describe current preventative maintenance activities?		
• Are preventative maintenance activities sufficient and effective in minimizing SSOs and blockages?		
Scheduled Inspections and Condition Assessments • Is there an ongoing condition assessment program sufficient to develop a capital improvement plan addressing the proper management and protection of infrastructure assets? Are current components of this program documented in the SSMP?		
Contingency Equipment and Replacement Inventory • Does the SSMP list the major equipment currently used in the operation and maintenance of the collection system and document the procedures of inventory management?		
• Are contingency equipment and replacement parts sufficient to respond to emergencies and properly conduct regular maintenance?		
Training • Does GCSD provide adequate training to staff and are records current?		
• Does the SSMP document current training expectations and programs?		

ELEMENT 5 – DESIGN AND PERFORMANCE PROVISIONS		
• Does the SSMP contain current design and construction standards for the installation of new sanitary sewer systems and for the rehabilitation and repair of existing sanitary sewer systems?		
• Does the SSMP document contain current procedures and standards for inspecting and testing the installation of new sewers, pumps and other appurtenances and the rehabilitation and repair of existing sewer lines?		
ELEMENT 6 – OVERFLOW AND EMERGENCY RESPONSE PLAN		
• Does GCSD's SSO Overflow and Emergency Response Plan establish procedures for the emergency response, notification and reporting of SSOs?		
• Is staff appropriately trained on the procedures of the SSO Overflow and Emergency Response Plan?		
• Is the SSO Overflow and Emergency Response Plan effective in handling SSOs in order to safeguard public health and the environment?		
ELEMENT 7 – FATS, OILS AND GREASE (FOG) CONTROL PROGRAM		
• Does the FOG Control Program include efforts to educate the public on the proper handling and disposal of FOG?		
• Does the FOG Control Program identify sections of the collection system subject to FOG blockages, establish a cleaning schedule and address source control measures to minimize these blockages?		
• Are requirements for grease removal devices, record-keeping and reporting established in the district's FOG Control Program?		
• Does the District have sufficient legal authority to implement and enforce the FOG Control Program?		

• Is the current FOG Control Program effective in minimizing blockages of sewer lines resulting from discharges of FOG to the system?		
ELEMENT 8 – SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN		
• Does GCSD's SSMP evaluate hydraulic deficiencies in the system and, if needed, establish sufficient design criteria and short/long term capacity enhancement and improvement projects?		
• If needed, does the SSMP establish a schedule of approximate completion dates for both short and long-term improvements and is the schedule reviewed and updated to reflect current budgetary capabilities and activity accomplishment?		
ELEMENT 9 – MONITORING, MEASUREMENT, PROGRAM MODIFICATIONS		
• Does the SSMP accurately portray the methods of tracking and reporting selected performance indicators?		
• Is the district able to sufficiently evaluate the effectiveness of SSMP elements based on relevant information?		
ELEMENT 10 – SSMP PROGRAM AUDITS		
• Will the SSMP Audit be conducted every two years as required by SWRCB 2006-0003-DWQ?		
ELEMENT 11 – COMMUNICATION PROGRAM		
• Does the District effectively communicate with the public about the development and implementation of it's SSMP and continue to address any feedback?		

Description of Scheduled Updates/Changes to the SSMP

Directions: For each NO answer, please describe the planned revision and indicate the date the revision will be completed. Reference the SSMP element with each explanation.