Bolinas Community Public Utility District
Sewer System Management Plan Audit Report

Audit ID: 257; Audit Period: 08/02/2022-08/02/2025

Conducted & Prepared by BCPUD Manager, Georgia Woods
gwoods@bcpud.org

<u>Table of Contents</u>

BOLINAS COMMUNITY PUBLIC UTILITY DISTRICT

Sewer System Management Plan (SSMP) Audit Report

Audit Period: August 3, 2022 – August 2, 2025
Reviewed and Approved by BCPUD Board: January 21, 2026
Submitted to CIWQS by: February 2, 2026

---

1. Introduction

The Bolinas Community Public Utility District (BCPUD) Sewer System Management Plan (SSMP) provides a framework for the proper management, operation, and maintenance of the District's sanitary sewer system. This audit covers the period **August 3, 2022 – August 2, 2025** and fulfills the requirement to evaluate the SSMP's effectiveness and compliance with both:

- **State Water Resources Control Board Order 2006-0003-DWQ** (previous requirements); and
- **General Order WQ 2022-0103-DWQ** (effective June 5, 2023), which introduced updated standards for SSMP audits, operator input, and reporting.

Purpose of Audit

- Evaluate the effectiveness of the SSMP in preventing sanitary sewer overflows (SSOs).
- Assess compliance with SSMP requirements and the new General Order.
- Identify deficiencies and recommend corrective actions.
- Incorporate input from operations and administrative staff to ensure the SSMP is both technically sound and practically implemented.

2. Methodology

The audit was conducted using a structured, multi-step approach to ensure comprehensive evaluation and compliance with updated regulatory requirements:

- **Step 1: Review Each SSMP Element**
  Completed the **BCPUD SSMP Audit Form (Appendix A)** to assess compliance with all 11 SSMP elements.
  Verified that goals, organizational structure, legal authority, and operational programs remain accurate and effective.

- **Step 2: Incorporate Operator and Administrative Input**

  Obtained technical feedback from the Chief Operator using **Form A — Chief Operator Feedback (Appendix B).**

  Gathered practical implementation feedback from field staff using **Form B — Field Operators SSMP Implementation Questionnaire (Appendix C).**

  Collected administrative compliance feedback using **Form C — Administrative Questionnaire (Appendix D).**

  Responses were analyzed to confirm the accuracy of audit findings, assess real-world challenges, and incorporate recommendations into the corrective action plan.

- **Step 3: Analyze Performance Data**

  Reviewed operational records for the audit period, including:
  - SSO reports and CIWQS submissions
  - Preventive maintenance logs (hydro-jetting, CCTV inspections)
  - Training records and certifications
  - Equipment inventory and readiness

  Evaluated trends in SSOs, maintenance effectiveness, and compliance with reporting deadlines.

- **Step 4: Prepare Corrective Action Plan**

  Summarized deficiencies identified during the audit.

  Developed a prioritized corrective action schedule with responsible parties and target completion dates.

  Incorporated feedback from operations and administrative staff to ensure feasibility and alignment with available resources.

3. Review of Existing SSMP—Summary of Findings

The General Manager completed **BCPUD's SSMP Audit Form (Appendix A)**, reviewing each of the 11 elements. Here is a summary of findings:

SSMP Element	Compliant? (Yes/No)	Notes / Deficiencies	Corrective Action & Timeline
1. Goals	Yes	Goals remain appropriate; support compliance with new Order.	None
2. Organization	Yes	Contact lists updated; org chart and LRO designation need review.	Review org chart and LRO role by next SSMP update (Aug 2026).

|			
3. Legal Authority	Yes	Ordinances current; enforcement language for private laterals and FOG compliance not explicit.	Confirm Ordinance 29/39 enforceability; revise if needed by Aug 2026.
4. Operation & Maintenance	Yes	Work order system not fully implemented; GIS governance procedures missing; contractor training policy absent; inventory lacks min/max standards.	Implement CMMS and document retention by Q2 2026; add GIS governance and contractor training policy by Aug 2026; define critical spares min/max and review cadence by Aug 2026.
5. Overflow Emergency Response Plan	Yes	SERP effective; reconcile sampling timelines; add spill drills; add contractor readiness checklist.	Clarify sampling timelines; add drill schedule and readiness checklist by Aug 2026.
6. FOG Control Program	Yes	Inspections ongoing; lacks formal recordkeeping standards; enforcement language for FOG compliance not explicit.	Add recordkeeping and retention standards; confirm enforcement language by Aug 2026.
7. Design & Performance Provisions	Yes	Appendix 5 lateral standards referenced but not formally adopted; enforcement linkage missing.	Adopt Appendix 5 standards and cross-reference enforcement authority by Aug 2026.
8. System Evaluation & Capacity Assurance	Yes	CIP review process not formalized; linkage to SSO lessons learned missing.	Add CIP review process tied to audits and Element 9 metrics; integrate SSO lessons learned by Aug 2026.
9. Monitoring, Measurement & Program Modifications	Yes	Trend analysis not formalized; linkage to CIP and SERP updates missing.	Add quarterly trend review and written reporting; link monitoring results to CIP and SERP updates by Aug 2026.
10. SSMP Program Audits	Yes	Transition to 3-year cycle complete; the Existing SSMP does not require staff input or CIWQS certification of audit findings (though the NEW	In order to be compliant with the New General Order, the new SSMP should add language requiring staff input and LRO certification for CIWQS

		order and this 3-year Audit did include Staff Input and will be Certified upon upload to CIWQS).	submission by Aug 2026.
11. Communication Program	Yes	Public updates ongoing; Existing SSMP does not require posting audits online or formal feedback process.	New SSMP should add requirement to post audits and define public feedback process by Aug 2026.

## 4. Compliance with General Order WQ 2022-0103-DWQ

- **Audit Frequency:** 3 years ✓
- **CIWQS Submission:** Scheduled for Feb 2, 2026 ✓
- **Operator Input:** Documented below ✓
- **Corrective Action Plan:** Included ✓

5. Performance Evaluation

- **Spill Category Definitions (per State Water Board):**
  - **Category 1:** Discharges ≥1,000 gallons or any volume reaching surface water and not fully recovered.
  - **Category 2:** Discharges <1,000 gallons that do not reach surface water.
  - **Category 3:** All other discharges, including those contained within buildings or fully captured before reaching surface water.
- **Sanitary Sewer Overflow (SSO) Summary (2022–2025):**
  - **Total SSOs:** Two Category 3 spills in 2022; none in 2023–2025
  - **Volume:** 758 gallons in 2022; zero in 2023–2025
  - **Causes:** Both incidents in 2022 involved blockages near the check valve at the lift station on 45 Wharf Road.
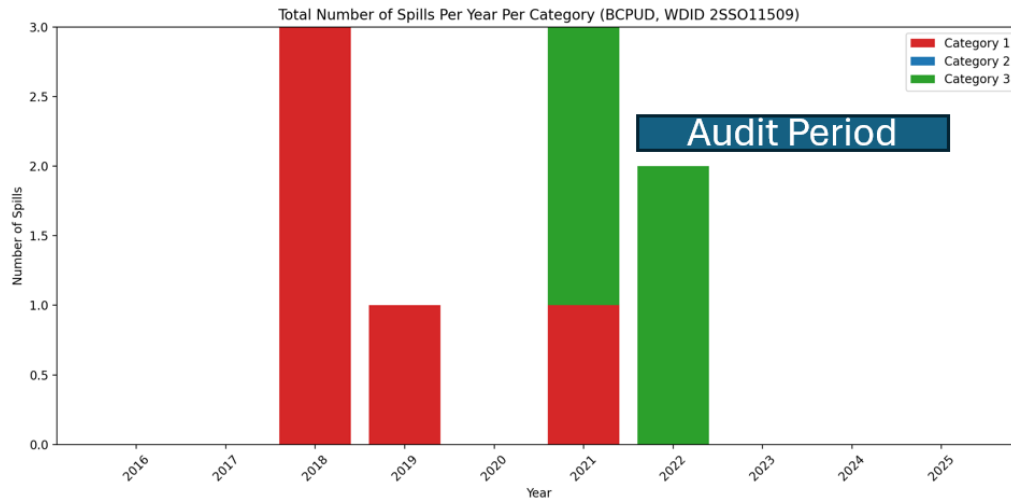
Figure 1: Total Number of Spills Per Year by Category (BCPUD, WDID 2SS011509).
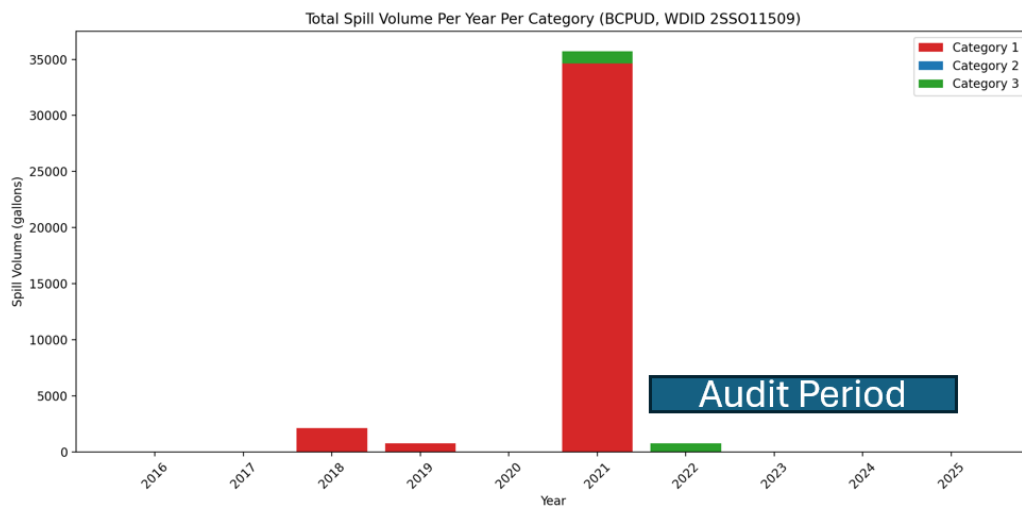
Figure 2: Total Spill Volume Per Year by Category (BCPUD, WDID 2SS011509).

- **Preventive Maintenance:**
  - Contracted Cleaned/CCTV inspected: 2022- 1130.4 ft; 2023 –1370.1 ft
  - BCPUD Operators Flushed: 2022-2025: quarterly flushing of the main leading to check valve (3000 ft total)
- **Certifications & Training:**
  - **Staff CWEA Collection Certifications:** Chief Operator CWEA Collection System Maintenance (Grade I); 2 Full Time Shift Operators CWEA Collection System (Grade I).
  - **Staff SWRCB Treatment Certifications:** Contracted Plant Supervisor (Grade V) Certification, Chief Operator Treatment (Grade I)

- o **Additional Certifications/Training:** Annual/Bi-Annual safety training completed, including: Defensive Driving; Confined Space Entry; Flagger/Cone Safety; Arc Flash Safety; Cal/OSHA Bloodborne Pathogens etc.

6. Operator & Administrative Input

- **Detailed Methodology**

  - o Operator/Admin input was obtained using structured feedback tools in **Appendices B, C, and D**:
    • **Chief Operator Feedback (Appendix B):** Captured technical and operational insights on audit findings, corrective action feasibility, and resource constraints.
    • **Field Operator Questionnaire (Appendix C):** Verified whether SSMP procedures are consistently implemented in daily operations and identified practical improvements.
    • **Administrative Compliance Questionnaire (Appendix D):** Gathered feedback on recordkeeping, reporting, and communication practices to ensure compliance with documentation and regulatory requirements.
  - o Feedback was analyzed to confirm the accuracy of audit findings, assess real-world challenges, and incorporate both frontline and administrative recommendations into the corrective action plan. This comprehensive approach ensures the audit reflects regulatory compliance, operational realities, and administrative effectiveness.

- **Summary of Feedback:**

  - **Training & Certification**
    - o One new hire (Sept 2024) lacked formal training and certification during the audit period.
    - o Other operators reported receiving training, but one did not complete certification—indicating gaps in the certification tracking process.
  - **Spill Response**
    - o Practical on-the-job training occurred; staff were equipped and responded effectively to spills.
    - o However, training was not formalized or clearly tied to SSMP requirements.
    - o Tabletop/mock emergency drills were inconsistent or absent.
  - **Preventive Maintenance & Work Orders**
    - o Preventive maintenance tasks were generally performed but work order tracking and recordkeeping were inconsistent.

- o Electronic work order system (Computerized Maintenance Management System, or CMMS) implementation remains incomplete/non-existent.
- **Administrative Feedback**
  - o Regulatory reporting was timely, but recordkeeping—especially training and certifications—was weak.
  - o SSMP updates and annual reviews were not consistently triggered by staffing changes.
- **Common Themes**
  - o Need for formalization of training, certification tracking, emergency preparedness drills, and recordkeeping standards.

Staff Feedback Summary: Feedback from operators and administrative staff confirms that while core operational practices were maintained, several processes lacked formal structure. Training and certification gaps, particularly for a new hire, point to weaknesses in tracking and documentation rather than technical capability. Spill response was effective in practice, but drills and formal exercises were not consistently conducted. Preventive maintenance occurred, yet work order documentation was incomplete, and the electronic CMMS system was not fully deployed. Administrative staff noted strong compliance with reporting deadlines but highlighted deficiencies in recordkeeping and SSMP updates following staff changes. Overall, these findings underscore the need for greater procedural rigor to ensure continuity and compliance during transitions and routine operations.

7. Corrective Action Plan

The following corrective actions address deficiencies identified during the audit and incorporate staff feedback, operational realities, and regulatory requirements. Actions are prioritized to ensure compliance with General Order WQ 2022-0103-DWQ and strengthen SSMP implementation.

Deficiency	Corrective Action	Responsible Party	Target Date
1. Work order system incomplete; preventive maintenance recordkeeping	Fully implement electronic work order system (Computerized Maintenance Management System, CMMS) with required data fields (asset ID, task type, findings, follow-up) and retention policy. Train staff	Chief Operator	**June 2026**

inconsistent	on CMMS use.		
2. Training and certification gaps; lack of formalized onboarding	Develop and adopt a formal training and certification tracking program, including onboarding checklist, certification deadlines, and documentation standards. Integrate into SSMP Element 4.	GM & Chief Operator	**Aug 2026**
3. Emergency preparedness drills not conducted consistently	Establish annual tabletop drills and biennial field exercises for spill response. Document after-action reviews and integrate lessons learned into SERP updates.	Chief Operator	**Aug 2026**
4. GIS governance procedures missing	Document GIS governance in SSMP: roles, update triggers, frequency, and version control for mapping system.	GM & Assistant GM	**Aug 2026**
5. Inventory lacks min/max standards for critical spares	Define critical spare parts list with minimum/maximum stocking levels and quarterly review cadence.	Chief Operator	**Aug 2026**
6. Contractor training and readiness verification absent	Add contractor qualification policy (CCTV, hydro-jetting, bypass pumping, confined space, traffic control) and require readiness checklist before mobilization.	GM & Chief Operator	**Aug 2026**
7. FOG program lacks recordkeeping and enforcement clarity	Add recordkeeping and retention standards for FOG inspections and BMP compliance; confirm enforcement language in Ordinance 29/39.	GM	**Aug 2026**
8. Design standards for laterals not formally adopted	Adopt Appendix 5 lateral standards and cross-reference enforcement authority in SSMP and Ordinance 29/39.	GM & Board	**Aug 2026**
9. CIP review process not formalized; missing linkage to SSO lessons learned	Add formal CIP review process tied to SSMP audits and Element 9 metrics; integrate SSO lessons learned into prioritization.	GM & Assistant GM	**Aug 2026**
10. Monitoring and trend analysis not formalized	Implement quarterly trend analysis and written reporting; link monitoring results to CIP and SERP updates.	GM & Chief Operator	**Aug 2026**
11. SSMP audit requirements	Revise SSMP to require documented staff input and LRO certification for CIWQS	GM	**Aug 2026**

incomplete	submission.		
12. Public communication gaps	Add requirement to post SSMP audits and updates online; define formal process for soliciting and documenting public feedback.	GM & Assistant GM	**Aug 2026**

Additional Recommendations

- **Evaluate LRO Designation:** Consider whether the Chief Operator, rather than the General Manager, should serve as the Legally Responsible Official (LRO) for CIWQS certification, given their direct operational oversight and technical expertise.
- **Strengthen Leadership Training:** Seek additional SSMP-focused training opportunities for the Chief Operator, General Manager, and Assistant General Manager to ensure leadership is well-versed in regulatory requirements and best practices.
- **Coordinate and Cooperate with Local Wastewater Districts:** Attend regional meetings, foster relationships with neighboring districts, and share best practices to improve emergency preparedness, regulatory compliance, and resource efficiency.
- **Enhance Continuity Planning:** Incorporate procedures to maintain training and certification programs during management transitions, reducing risk of lapses when leadership changes occur.
- **Embed SSMP Awareness:** Require periodic SSMP refresher sessions for all supervisory staff to reinforce compliance responsibilities and operational alignment.

8. Certification

I certify under penalty of perjury under the laws of the State of California that, to the best of my knowledge, this audit report is true, accurate, and complete, and complies with the Statewide Sanitary Sewer Systems General Order WQ 2022-0103-DWQ.

Legally Responsible Official: Georgia Woods
Title: General Manager
Signature: _____
Date: _____

APPENDIX A: Sewer System Management Audit Form

The purpose of this SSMP Audit Form is to evaluate the effectiveness of the BCPUD's SSMP and identify any needs for improvement. This audit also ensures that the existing SSMP is scrutinized for compliance with the **new General Order WQ 2022-0103-DWQ**. Where warranted, **new questions have been added** to identify potential gaps in the current SSMP and guide development of the updated SSMP.

Directions: Please check **YES** or **NO** for each question. If **NO** is answered for any question, describe the updates/changes needed and the timeline to complete those changes in the "Description of Scheduled Updates/Changes to the SSMP" section on Page 5 of this form.

Date Completed: _____

Completed by: _____

ELEMENT 1 – GOALS

	YES	NO
A. Are the goals stated in the SSMP still appropriate and accurate?		
B. NEW: Do the goals explicitly support compliance with General Order WQ 2022-0103-DWQ, including continuous improvement, electronic reporting, and integration of updated regulatory requirements?		

ELEMENT 2 – ORGANIZATION

	YES	NO
A. Is the BCPUD Staff telephone list current?		
B. Is the SSO Chain of Communication telephone list current?		
C. Is Figure 2-1 of the SSMP, entitled "Organization of BCPUD Staff Responsible for Sewer System," current?		
D. Are the position descriptions accurate portrayals of staff responsibilities?		

E. Is Figure 2-2 of the SSMP, entitled "SSO Reporting Chain of Communication" accurate and up-to-date?		
F. NEW: Does the current SSMP organization structure remain optimal given any recent staff changes, or warrant changes?		
G. NEW: Should the SSMP evaluate whether the current LRO designation (General Manager) remains appropriate?		

ELEMENT 3 – LEGAL AUTHORITY

Does the SSMP contain references to the current BCPUD Ordinance(s) documenting the BCPUD's legal authority to:

	YES	NO
A. Prevent illicit discharges?		
B. Require proper design and construction of sewers and connections?		
C. Ensure access for maintenance, inspection or repairs for portions of the laterals owned or maintained by the district?		
D. Limit discharges of fats, oils and grease?		
E. Enforce any violation of its sewer ordinance?		
F. NEW: Does the SSMP explicitly reference enforcement mechanisms for private laterals and FOG compliance under the new General Order?		
G. NEW: Does the SSMP explicitly reference CIWQS electronic reporting requirements and timelines introduced by WQ 2022-0103-DWQ?		

ELEMENT 4 – OPERATIONS AND MAINTENANCE PROGRAM

Collection System Maps

	YES	NO
A. Does the SSMP reference the current process and procedures for maintaining the BCPUD's sewer collection system maps?		
B. Are the BCPUD's sewer collection system maps complete, current and sufficiently detailed?		
C. NEW: *Does the SSMP confirm the implementation of a GIS-based mapping system with version control and change-management procedures (who updates, update triggers, and update frequency) for mains, manholes, pump facilities, pressure pipes, valves, and lateral points of connection?*		

Resources and Budget

	YES	NO
D. Does the BCPUD 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

	YES	NO
E. Does the SSMP describe current preventative maintenance activities?		
F. Are the BCPUD's preventative maintenance activities sufficient and effective in minimizing SSOs and blockages?		
G. NEW: Does the SSMP confirm a fully implemented electronic work order/CMMS (or equivalent digital recordkeeping) for preventive maintenance and inspections, including required data fields (asset ID, task type, findings, follow-up) and retention period?		

Scheduled Inspections and Condition Assessments

	YES	NO
H. 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

	YES	NO
I. 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?		
J. Are contingency equipment and replacement parts sufficient to respond to emergencies and properly conduct regular maintenance?		
K. NEW: Does the SSMP identify critical spare parts with minimum/maximum stocking levels and an inventory review cadence (e.g., quarterly) to sustain emergency readiness?		

Training

	YES	NO
L. Are the training records current?		
M. Does the SSMP document current training expectations and programs within the district's Wastewater department?		
N. NEW: Does the SSMP require and document training/qualification standards for contractors (e.g., CCTV, hydro-jetting, bypass pumping, confined space, traffic control) and verification prior to mobilization?		

Outreach to Plumbers and Building Contractors

	YES	NO
O. Does the SSMP document contain current outreach efforts to plumbers and building contractors?		

ELEMENT 5 – OVERFLOW AND EMERGENCY RESPONSE PLAN

	YES	NO
A. Does the BCPUD's SSO Overflow and Emergency Response Plan establish procedures for the emergency response, notification and reporting of SSOs?		
B. Is wastewater staff appropriately trained on the procedures of the SSO Overflow and Emergency Response Plan?		
C. Is the SSO Overflow and Emergency Response Plan effective in handling SSOs in order to safeguard public health and the environment?		
D. NEW: Does the SSMP explicitly reconcile and align all receiving water sampling timelines under WQ 2022-0103-DWQ (i.e., ≤18 hours for ≥50,000-gallon discharges to surface waters) with any earlier SSMP language (e.g., 48-hour references), to avoid ambiguity?		
E. NEW: Does the SSMP require periodic spill response drills/exercises (tabletop or field) to validate SERP readiness and interagency coordination (e.g., Marin County EHS, DPW Stormwater)?		
F. NEW: Does the SSMP require contractor readiness verification (e.g., spill kit availability, bypass pumping plans, confined space permits, traffic control setups) before mobilization, and capture this in the spill or work order documentation?		
G. NEW: Does the SSMP define a standard method for spill volume estimation and require documenting the methodology and assumptions (e.g., SCADA data, flow depth/area, recovery estimates) in all CIWQS reports?		

H. NEW: Does the SSMP specify public advisory posting responsibilities and criteria (e.g., where/when to post, duration, coordination with Marin County EHS), including for potential discharges?		
I. NEW: Does the SSMP require annual SERP effectiveness review with documented updates and retraining?		

ELEMENT 6 – FATS, OILS AND GREASE ("FOG") CONTROL PROGRAM

	YES	NO
A. Does the FOG Control Program include efforts to educate the public on the proper handling and disposal of FOG?		
B. 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?		
C. Are requirements for grease removal devices, best management practices ("BMP"), record-keeping and reporting established in the district's FOG Control Program?		
D. NEW: Does the SSMP define recordkeeping and retention standards for FOG inspections and BMP compliance (e.g., grease interceptor logs, employee training records)?		
E. Does the BCPUD have sufficient legal authority to implement and enforce the FOG Control Program?		
F. NEW: Does the SSMP explicitly reference enforcement mechanisms for private laterals and FOG compliance under the new General Order?		
G. Is the current FOG Control Program effective in minimizing blockages of sewer lines resulting from discharges of FOG to the system?		

ELEMENT 7 – DESIGN AND PERFORMANCE STANDARDS

	YES	NO
A. 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?		
B. 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?		

	YES	NO
C. NEW: Does the SSMP explicitly confirm formal adoption of design and inspection standards for private laterals (Appendix 5) and document enforcement mechanisms under Ordinance 29/39?		

ELEMENT 8 – SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

	YES	NO
A. Does the BCPUD's SSMP evaluate hydraulic deficiencies in the system and, if needed, establish sufficient design criteria and short/long term capacity enhancement and improvement projects?		
B. If needed, does the BCPUD's 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?		
C. NEW: Does the SSMP explicitly document a process for periodic CIP review and update tied to SSMP audits and Element 9 performance metrics?		
D. NEW: Does the SSMP confirm integration of lessons learned from SSOs or near misses into CIP prioritization?		

ELEMENT 9 – MONITORING, MEASUREMENT AND PROGRAM MODIFICATIONS

	YES	NO
A. Does the SSMP accurately portray the methods of tracking and reporting selected performance indicators?		
B. Is the BCPUD able to sufficiently evaluate the effectiveness of SSMP elements based on relevant information?		
C. NEW: Does the SSMP define a formal schedule and method for trend analysis (e.g., quarterly review of SSO frequency, location, volume) and require written documentation of findings?		
D. NEW: Does the SSMP explicitly link monitoring results to updates in CIP (Element 8) and SERP (Element 5) for continuous improvement?		

ELEMENT 10 – SSMP AUDITS

Note: This audit process itself is **compliant with WQ 2022-0103-DWQ** (three-year frequency, documented staff input, and CIWQS submission). However, the SSMP will be revised to explicitly reflect these new audit requirements and procedures.

	YES	NO
A. NEW: Will the SSMP Audit be conducted every **three years** as required by WQ 2022-0103-DWQ?		
B. NEW: Does the SSMP require documented staff input (e.g., operator feedback forms, supervisor review) as part of the audit process?		
C. NEW: Does the SSMP require audit findings to be formally incorporated into SSMP updates and certified by the LRO for CIWQS submission?		

ELEMENT 11 – COMMUNICATION PROGRAM

	YES	NO
A. Does the BCPUD effectively communicate with the public about the development and implementation of its SSMP and continue to address any feedback?		
B. NEW: Does the SSMP explicitly require posting of SSMP audits and updates on the district's website for public access?		
C. NEW: Does the SSMP define a formal process for soliciting and documenting public feedback during SSMP updates?		

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 and question number with each explanation.

Planned Revisions:
(The following updates address all NO responses identified in the audit form and will be incorporated into the next SSMP update.)

APPENDIX B

Form A – Chief Operator Feedback on SSMP Audit

Audit Period: August 3, 2022 – August 2, 2025
Chief Operator Name: _____
Date: _____

Purpose

Provide technical and operational feedback on SSMP implementation during the audit period. Confirm that training, procedures, and readiness requirements were met, and identify improvements.
Note: The Chief Operator will review the completed SSMP Audit Form (Appendix A) and provide comments on accuracy and corrective actions. Additional comments on the full audit report will be requested before Board approval.

Section 1: Employment & Training

1. Were you employed as Chief Operator for the entire audit period? ☐ Yes ☐ No
2. Did you maintain required CWEA certification during the audit period? ☐ Yes ☐ No
3. Did you complete annual SERP refresher training? ☐ Yes ☐ No
4. Did you complete annual safety training (confined space, traffic control, CPR)?
   ☐ Yes ☐ No
5. Did you verify that all operators received required SSMP and SERP training?
   ☐ Yes ☐ No

Section 2: Oversight of SSMP Procedures

6. Were preventive maintenance tasks (hydro-jetting, CCTV, manhole checks) completed as scheduled? ☐ Yes ☐ No
7. Was the work order system used consistently for PM and corrective work?
   ☐ Yes ☐ No
8. Did you review and approve condition assessment findings (CCTV, smoke testing)?
   ☐ Yes ☐ No
9. Were corrective actions from inspections implemented promptly?
   ☐ Yes ☐ No

Section 3: Emergency Response Readiness

10. Were spill kits, bypass pumping equipment, and critical spares available throughout the audit period? ☐ Yes ☐ No
11. Did you verify contractor readiness for emergency response (spill kits, bypass plans, safety permits)? ☐ Yes ☐ No
12. Were SERP procedures followed during any spill events? ☐ Yes ☐ No
13. Did you review after-action reports for spills and incorporate lessons learned? ☐ Yes ☐ No

Section 4: SSMP Review & Comments

14. Did you review the current SSMP during the audit period? ☐ Yes ☐ No
15. Do you believe the SSMP accurately reflects current practices and requirements? ☐ Yes ☐ No
16. Comments or suggested changes for the next SSMP update:

Section 5: FOG & Enforcement

17. Did you oversee FOG inspections and BMP compliance checks? ☐ Yes ☐ No
18. Were enforcement actions taken when necessary? ☐ Yes ☐ No

Section 6: Mapping & Asset Management

19. Did you review and approve updates to sewer system maps? ☐ Yes ☐ No
20. Was GIS mapping progress monitored and documented? ☐ Yes ☐ No

Section 7: Capital Improvement Planning (CIP)

21. Did you identify any critical CIP projects needed within the next 5–10 years? ☐ Yes ☐ No
22. If yes, list priority projects and rationale:
1.

2.

3.

Section 8: Audit Form Review & Corrective Actions

23. Have you reviewed the completed SSMP Audit Form (Appendix A)? ☐ Yes ☐ No
24. Do you agree the findings accurately reflect system performance and compliance?
    ☐ Yes ☐ No
25. If no, list any discrepancies or clarifications needed:
26. Based on your review, what corrective actions do you recommend for issues identified in the SSMP?
    1.

    2.

    3.

(Additional comments can be provided after reviewing the full audit report.)

Certification:

I certify that the above responses are accurate and reflect SSMP implementation during the audit period.

Chief Operator Signature: _____

Date: _____

APPENDIX C

Form B – Operator Feedback on SSMP Audit

Audit Period: August 3, 2022 – August 2, 2025
Operator Name: _____
Role/Certification: ☐ Trainee ☐ Grade I ☐ Other: _____
Date: _____
Supervisor: _____

Purpose

Verify SSMP training and procedures were implemented during the audit period.

Section 1: Employment & Training

1. Were you hired during the audit period (Aug 2022–Aug 2025)? ☐ Yes ☐ No
2. If yes, did you receive SSMP orientation? ☐ Yes ☐ No
3. Did you receive spill response training (SERP procedures)? ☐ Yes ☐ No
4. Did you receive annual SERP refresher training? ☐ Yes ☐ No
5. Did you receive annual safety training (confined space, traffic control, CPR)? ☐ Yes ☐ No
6. Did you maintain CWEA certification during the audit period? ☐ Yes ☐ No

Section 2: Preventive Maintenance & Work Orders

7. Did you receive work orders for preventive maintenance tasks?
   ☐ Always ☐ Sometimes ☐ Never
8. Were hydro-jetting and CCTV inspections completed as scheduled? ☐ Yes ☐ No
9. Were manhole inspections and wet well checks documented? ☐ Yes ☐ No

Section 3: Emergency Response

10. Did you participate in any spill response during the audit period? ☐ Yes ☐ No
11. If yes, were SERP steps followed (containment, cleanup, reporting)? ☐ Yes ☐ No
12. Were spill kits and bypass pumping equipment available when needed? ☐ Yes ☐ No

Section 4: FOG & Outreach

13. Did you observe grease-related issues during the audit period? ☐ Yes ☐ No
14. If yes, did you report them or follow SSMP procedures? ☐ Yes ☐ No

Section 5: Mapping & Asset Management

15. Did you use sewer system maps for your work? ☐ Yes ☐ No
16. Were maps accurate for the locations you worked on? ☐ Yes ☐ No
17. Did you report any map errors? ☐ Yes ☐ No

Section 6: Feedback

18. Top 3 improvements that would help SSMP implementation:
1.

2.

3.

Certification:

I certify that the above responses are accurate to the best of my knowledge.

Operator Signature: _____

 Date: _____

APPENDIX D

Form C – Administrative Compliance Questionnaire

Audit Period: August 3, 2022 – August 2, 2025
Respondent: ☐ Administrative Assistant ☐ Assistant General Manager
Date: _____

Purpose

Gather feedback on SSMP compliance with documentation, reporting, and communication requirements during the audit period.

Section 1: Recordkeeping & Documentation

1. Were all SSMP-related records (SSO reports, work orders, training logs) maintained for at least 5 years? ☐ Yes ☐ No
2. Were completed work orders and preventive maintenance logs filed and accessible? ☐ Yes ☐ No
3. Were training records (CWEA certifications, safety refreshers) current and organized? ☐ Yes ☐ No
4. Were staff and emergency contact lists updated annually and distributed? ☐ Yes ☐ No
5. Were staff and emergency contact lists updated promptly after any personnel changes (e.g., new hire, role change, resignation)? ☐ Yes ☐ No

Section 2: Reporting & CIWQS Compliance

6. Were monthly "No Spill" certifications and spill reports submitted on time in CIWQS? ☐ Always ☐ Sometimes ☐ Rarely
7. Was the Annual Report prepared and submitted by April 1 each year? ☐ Yes ☐ No
8. Were spill notifications to Cal OES and other agencies documented and filed? ☐ Yes ☐ No
9. Is the SSMP posted on the district website and available for public review? ☐ Yes ☐ No

Section 3: Communication & Public Outreach

10. Were Board meeting agendas and packets including SSMP updates prepared and posted on time? ☐ Yes ☐ No
11. Were customer communications (newsletters, notices) regarding sewer system updates issued as needed? ☐ Yes ☐ No

Section 4: Administrative Challenges & Recommendations

12. What administrative tasks were most time-consuming or difficult under the SSMP?

13. What improvements would make compliance easier (software, staffing, training)?

Certification:

I certify that the above responses are accurate and reflect SSMP compliance during the audit period.

Signature: _____

Date: _____