A scenic view of a lake with mountains in the background and reeds in the foreground. The sky is overcast with grey clouds. The mountains are covered in green vegetation with some brown patches. The lake is calm with some ripples. In the foreground, there are tall green reeds. The text is overlaid on the lake.

# Statewide General Order for Sanitary Sewer Systems & Sewer System Management Plan (SSMP)

May 2023

# Background

- 2005 and before: EPA *Capacity, Management, Operations and Maintenance (CMOM)* Program Guidance. Requirements adopted by many states
- 2003: BACWA + SF Bay Regional Water Board Resolution *Collaboration to Report and Manage Sanitary Sewer Overflows (SSOs)*
- 2005: Regional Water Board issues *New Requirements for Preparing Sanitary Sewer Management Plans* and *RWB/BACWA SSMP Development Guide*
- 2006: State Water Board (SWRCB) Resources Control Board issues Order 2006-003-DWQ *General Waste Discharge Requirements for Sanitary Sewer Systems*
  - Largely mirrors SF Bay Water Board SSMP Requirements (“Elements”)
  - Mandatory Notification and Reporting of SSOs in SWRCB’s on-line database (CIWQS)
- 2013: Amendments to General Order’s Monitoring and Reporting Program
- 2022: State Water Board reissues Statewide General Order
  - Culminated a 6+ year stakeholder process, with BACWA, CASA, and SCAP and others heavily involved.
  - A number of the more problematic proposed requirements were deleted from the final version

# LGVSD's SSMP

- Developed by EOA and District Staff, over 2006-2008 in accordance with General Order's schedule
- Certified by LGVSD Board in 2009
- Updated every 2-3 years; recertified by LGVSD Board in 2014 and 2020
- Available on District web site



## Sewer System Management Plan

May 2020 Update

Prepared by  
EOA, Inc.  
and  
District Staff

# SSMP Elements

- Statement of Goals
- Agency Organization
- Legal Authority
- Operations and Maintenance Program
  - System Maps
  - Preventative O&M Process
  - Condition Assessment Process
  - Rehab/Replacement Plan
  - Resources and Budget
  - Training
  - Equipment & Replacement Inventory
- Design and Performance Standards
- Sanitary Sewer Overflow Emergency Response Plan

# SSMP Elements, continued

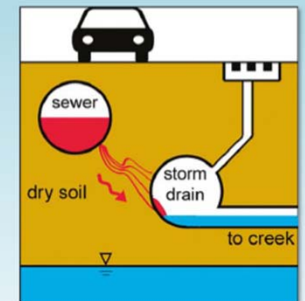
- FOG Control Program
- System Evaluation and Capacity Assurance Plan
  - Establish capacity design criteria
  - Identify capacity bottlenecks
  - Implement Capital Improvement Plan to address capacity issues
  - Based on Nute Engineering 2008 Capacity Assessment
- Monitor SSMP Implementation & Effectiveness and Update Plan
  - Track performance metrics (cleaning footages, spill rates, etc)
- Program Audits
- Public Communication Program

# New General Order

- Adopted by State Water Board 12/6/2022. Effective 6/5/2023
  - State Water Board staff view the new/updated requirements as relatively minor
- Proposed items not in the new Order:
  - Identifying sewer line exfiltration rates
  - Mandatory Collection System Operator certification requirements
  - Mandatory Collection System Operator certification requirements
  - SSMP Certification requirements (Registered Engineer or CWEA-certified Operator)
  - Mandatory reporting of private lateral spills (New Order “encourages” reporting)
  - Annual updating of Spill Emergency Response Plan
  - FOG Control Program expanded to include Root Control Program

## Is an Exfiltration Enforcement Action in Your Future?

### San Diego Region “Exfiltration” Investigative Order



BACWA Collection Systems Committee  
January 30, 2020

(Sercu et al. 2011, ES&T)

Steve Jepsen  
sjepsen@scap1.org

# New General Order

## ■ Additions and Changes

- “Waters of the State” rather than “Waters of the U.S.”
- “SSO” replaced by “Spill”
- Revised Legally Responsible Official (LRO) designation requirements
- New SSO Category 4 spill with reduced reporting requirements (<50 gal that do not reach Waters of State)
- Very frequent use of the requirement for SSMP to “include procedures for ...”
- Expanded requirements for System Evaluation and Condition Assessment, including numerical targets (Element 8)
- Identification of assets vulnerable to direct and indirect impacts of climate change
- Revisions to mandatory monitoring for spills >50,000 gallons
- Requirement to coordination with local storm drain agency and inclusion of stormwater conveyance facilities on maps
- Annual reporting with standardized reporting of certain long-term trends
- New schedule for SSMP Audits and SSMP Updating & Governing Board Approval

# New General Order

- Immediate Compliance Actions by June 5, 2023
  - File for Continuing Coverage (done)
  - Revise Emergency Response Plan to conform with relevant new requirements (in progress)
  - Upload existing SSMP to CIWQS database
  
- Longer Term Actions
  - 1<sup>st</sup> Annual Report due April 1, 2024
  - SSMP Internal Audit – Due 8/2/2024
  - SSMP Update - Due 8/2/2025 Update will need to be consistent with new General Order requirements



# **Regional Water Board Key Priorities for Collection Systems**

- Spill Reduction, particularly spills to Waters of the State
- Inflow & Infiltration Reduction
- Pipeline Rehabilitation/Replacement Rates
- System Resiliency Issues