

## SECTION X SSMP AUDIT

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### **SSMP Audit**

The purpose of the SSMP Audit is to evaluate the effectiveness of the District's SSMP, to ensure that all elements within the SSMP are compliant and current with SWRCB requirements, and that the SSMP is being implemented and managed appropriately. The SSMP Audit is a critical process that promotes continuous improvement of the District SSMP, ultimately resulting in enhanced effectiveness and efficiency of District operations. Prior to calendar year 2012 an annual SSMP Audit was required by the San Francisco Bay Regional Water Quality Control Board (RWQCB), but has since been discontinued per RWQCB's letter, dated October 3, 2012. The SSMP Audit, as stated in SWRCB Order No. 2006-0003-DWQ, is a biennial audit (every two years) with the next deadline set for May 2, 2020. The 2018 SSMP Audit, which covered the years 2016 and 2017, was performed and completed by the required deadline and was presented to the District Board on May 9, 2018 (ref. Appendix F.3).

### **Assessment**

The audit process is a self-assessment of the District's SSMP that includes the examination of events, experiences, and data during the two-year time period since the previous audit. The Audit highlights successes and challenges experienced during this time period and attempts to correlate how the SSMP influenced that outcome. The District SSMP Audit consists of two major components: SSMP Effectiveness and SSMP Compliance. SSMP Effectiveness is evaluated by discussion and review of key performance indicators and SSMP Compliance is evaluated by a review of elements within the SSMP.

The 2018 SSMP Audit indicates that the District's SSMP is both effective and compliant and that the District is functioning very well. The effectiveness of the District's SSMP is demonstrated by comparing Sanitary Sewer Overflow (SSO) Spill Rate Indices to state and regional averages. A long standing and accepted indicator of a well performing sewage collection system is achieving a spill rate of less than 3.0 SSOs per 100 miles of collection system. In 2017 the District achieved a very low sewer main SSO spill indices of 2.41 SSOs/100 miles, as compared to state and regional averages of 14.07 and 16.18, respectively. Comparison of the District's sewer main SSO spill volume indices indicates a similar favorable comparison of 49 gallons/1000 capita/yr, as compared to state and regional averages of 11,375 and 4,258, respectively.

A detailed review of SSMP Elements can be found in the 2018 SSMP Audit, but in summary the District's SSMP is compliant and contains all required elements. A Narrative

for Recommended Updates and Revisions at the end of the 2018 SSMP Audit describes some of the recommended improvements and the respective actions required. Most of these findings are administrative updates of charts and lists, while some recommended improvements may require an extended amount of time to develop and incorporate. Examples of some of these improvements include: creating a Standard Operating Procedures (SOP) for SSO event documentation and record keeping, completion of Competency Based Training (CBT) for Maintenance Staff, etc. It should be noted that all recommendations can be easily addressed and that no significant deficiencies were found.

## **Audit Elements**

The District's SSMP Audit is comprehensive and addresses all elements of the SSMP to properly demonstrate the degree of effectiveness achieved. The following are some of the areas addressed in the Audit:

- a. The stated purpose or goals are valid and reflects current regulation and District Policy
- b. The executable actions reflect current processes and procedures
- c. All other information shown is correct and current
- d. The status of actions or improvements that were previously proposed in the SSMP
- e. All unplanned actions or improvements that were implemented
- f. Modifications made to the SSMP since the last audit
- g. The monitoring and measurements identified in Section IX
- h. Overview of the SSMP's effectiveness in achieving the stated goals
- i. Proposed changes to the SSMP
- j. Proposed improvements to the collection system, operational procedures, maintenance program, etc., for the upcoming year

## **Reporting**

The District's SSMP Audit is available for review by stakeholders and the public by visiting the District website at: <http://www.westvalleysan.org/documents/engineering/ssmp> and is also kept on file for viewing by visiting the District Office. In addition, the presentation of this Audit to the District Board for their acceptance is one method of informing each of the municipalities served by the District. As part of the District's obligation to Northern California River Watch, an electronic copy of the 2018 SSMP Audit was provided for their review.