

Sewer System Management Plan (SSMP) Audit (May 2021 to May 2024)



Prepared by:



Sanitary Sewer Collection System
WDID=8SSO10580

TABLE OF CONTENTS

PART 1 (Executive Summary)	3
PART 2 (Detailed Audit Findings/Recommendations)	15
Element 1 – Goal And Introduction	15
1.1 Regulatory Context	15
1.2 SSMP Update Schedule.....	15
1.3 Sewer System Asset Overview	15
Element 2 – Organization	18
Element 3 – Legal Authority	21
Element 4 – Operations and Maintenance Program	23
4.1 Updated Map of Sewer System	23
4.2 Preventive Operation and Maintenance Activities	23
4.3 Training	23
4.4 Equipment Inventory	24
Element 5 – Design and Performance Provisions	27
Element 6 – Spill Emergency Response Plan	30
Element 7 – Sewer Pipe Blockage Control Program	34
Element 8 – System Evaluation, Capacity Assurance, Capital Improvements	37
8.1. System Evaluation and Condition Guidance	37
Element 9 – Monitoring, Measurement, Program Modifications	40
Element 10 – Internal Audits	42
Element 11 – Communication Program	44
Attachment E1 – Notification, Monitoring, Reporting, Record Keeping	46

LIST OF FIGURES

Figure 1 - IEUA Sewer Service Area Boundary Map	6
Figure 2 - IEUA Facility At-A-Glance report (State Water Board Online Database, CIWQS 2024)	7
Figure 3 - IEUA SSMP Update/Audit Due Dates (SWRCB website)	8
Figure 4 - IEUA spill dashboard (2007-2024).....	9
Figure 5 - IEUA Spill Rates (# of spills/100 miles) compared with other agencies during (2007-2024)	10
Figure 6 - IEUA spill recovery metrics (Cat 1/2/3 spills) compared with other agencies, 2007-2024	11

LIST OF APPENDICIES

APPENDIX 1 – IEUA Compliance Evaluation Inspection (CEI) Report
APPENDIX 2 – IEUA Previous SSMP Audit Findings
APPENDIX 3 – IEUA Spill Performance Benchmark Report
APPENDIX 4 – IEUA SSMP Audit Implementation Plan and Schedule
APPENDIX 5 – IEUA Key Performance Indicator (KPIs)
APPENDIX 6 – IEUA List of Spills (2007-2024)

REVIEWED AND APPROVED BY

LUCIA DIAZ,

Inland Empire Utilities Agency

Manager/Facilities & Water System Program

Legally Responsible Official (LRO)

Lucia Diaz^{#971}

Date Signed: 10/31/2024

Signature indicates system operators were provided opportunity to comment on the Audit findings¹

¹ Required under Specification 5.4 of the Reissued WDR (see pages 19-20)

CERTIFICATE

— OF COMPLETION —

INLAND EMPIRE UTILITIES AGENCY

Sewer System Management Plan Audit (May 2021-May 2024)

- *Regulatory review, agency expectations and compliance best practices.*
- *Regional Water Quality Control Board inspector expectations.*
- *Completion of State Water Board Pre-Inspection Questionnaire*
- *Completion of Compliance Evaluation Inspection (CEI).*
- *Findings/Best Practice Recommendations for further improving agency program effectiveness, compliance, and resilience.*



Jim Fischer

James Fischer, PE (NPDES Compliance Inspector)

10/18/24



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October 26, 2024

INLAND EMPIRE UTILITIES AGENCY (WDID #8SSO10580)

Att: Lucia Diaz, Manager of Facilities & Water System Pgm.
6075 Kimball Ave
Chino, CA 91708

Dear Lucia,

We are pleased to present the 2021-2024 Sewer System Management Plan (SSMP) Audit Report for the Inland Empire Utilities Agency (see Attachment 1).

The SSMP Audit revealed that the Agency is in full compliance with Attachment D-10 of the Sanitary Sewer Collection System [Reissued WDR \(State Water Board, Water Quality Order No. 2022-0103-DWQ\)](#). The Audit also shed light on many existing and successful Agency best practices and presents additional potential areas to consider for further improvement. When comparing the Agency spill performance metrics with other collection systems in the Santa Ana Regional Water Board area and throughout the State, the Agency performs near the top.

Detailed desktop and field reviews incorporating USEPA/Water Board Compliance Evaluation Inspection (CEI) procedures, including comprehensive interviews with management and field staff were relied upon for generating the Audit findings and best practice recommendations. With completion of the Audit, the Agency is now one of the first in the State to be comprehensively evaluated under the Reissued WDR ahead of the required deadline.

We look forward to supporting the Agency with ongoing program optimizations to meet and exceed all compliance standards specified in the Reissued WDR.

Sincerely,

James Fischer, P.E.
Principal, Credentialed U.S. EPA NPDES Compliance Inspector

Attachment 1 (2024 Sewer System Management Plan Audit Report)

PART 1 (Executive Summary)

The Inland Empire Utilities Agency (Agency) is charged with complying the State Water Resources Control Board (SWRCB) General Reissued Waste Discharge Requirements (WDR) for Sanitary Sewer Systems ([“Reissued WDR”, Order No. 2022-0103-DWQ](#)). The Reissued WDR replaced the original 2006 WDR (Order No. 2006-003-DWQ and its Monitoring and Reporting Program, Order No. 2013-0058-EXEC), which became effective on June 5, 2023.

The Reissued WDR requirements are the strictest sewer regulations in the country requiring a proactive approach for operations, maintenance, and management of sanitary sewer collection system to reduce or eliminate sewer spills. Attachment D-10 of the Reissued WDR requires periodic SSMP Audits to be completed by the IEUA at least every three years.

To comply with the SSMP Audit requirements, Fischer Compliance LLC in collaboration with IEUA management completed a Sewer System Management Plan (SSMP) Audit covering May 2021 through May 2024.



This Audit report meets and exceeds the minimum requirements specified in the Reissued WDR (Attachment D-10 and Specifications 5.4), scaled to the size/complexity of the IEUA’s sewer system. This includes evaluating the SSMP implementation and effectiveness, compliance with the Reissued WDR, and identifying deficiencies in addressing ongoing spills.

Regulatory Background

The Reissued WDR requires local public sewer collection system agencies, referred to as “Enrollees,” to develop a Sewer System Management Plan (Sewer System Management Plan). Sewer System Management Plans must be audited (by IEUA staff or outside consultants) at least every three (3) years and updated every 6 years according to the Water Board’s regulatory schedule.

2006 WDR: To provide a consistent, statewide regulatory approach to address sewage spills, the State Water Resources Control Board (State Water Board) adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003 (SSS WDRs), on May 2, 2006. All public agencies that own or operate a sanitary sewer system that is comprised of more than one mile of pipes or sewer lines that convey wastewater to a publicly owned treatment facility were required to apply for coverage under the Order.

2022 WDR: The 2006 WDR was rescinded and replaced with a “Reissued WDR” (Order No. 2022-0103-DWQ), adopted on December 5, 2023 which became effective on 6/5/2023. The Reissued WDR updates many aspects of the 16-year-old Order and includes several new requirements for Sewer System Management Plans.

Detailed SSMP Audit Requirements

This section provides details about the SSMP Audit requirements mandated by the Reissued WDR. An SSMP is a spill reduction/mitigation plan that lays the foundation for how an agency implements its work programs, assesses effectiveness of its maintenance program, and provides resilience to bounce-back from emergencies, upsets, and scrutiny by regulators conducting a Compliance Evaluation Inspection (CEI) or formal spill investigation.

The Reissued WDR includes the following specific requirements for completion of SSMP Internal Audits:

Specifications 5.4 (Sewer System Management Plan Audits, page 19):

*“The Enrollee shall conduct an internal audit of its Sewer System Management Plan, and implementation of its Plan, at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the Enrollee’s last required audit period. **Within six months after the end of the required 3-year audit period**, the Legally Responsible Official shall submit an audit report into the online CIWQS Sanitary Sewer System Database per the requirements in section 3.10 (Sewer System Management Plan Audit Reporting Requirements) of Attachment E1 of this General Order. Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff.*

The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills. The Enrollee’s sewer system operators must be involved in completing the audit. At minimum, the audit must:

- *Evaluate the implementation and effectiveness of the Enrollee’s Sewer System Management Plan in preventing spills.*
- *Evaluate the Enrollee’s compliance with this General Order.*
- *Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and*
- *Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.*

The Enrollee shall submit a complete audit report that includes:

- *Audit findings and recommended corrective actions.*
- *A statement that sewer system operators’ input on the audit findings has been considered; and*
- *A proposed schedule for the Enrollee to address the identified deficiencies.”*

Attachment D-10 (Internal Audits, page D-10):

The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order.

SSMP Auditing Procedures

A comprehensive SSMP Audit incorporating procedures developed by Fischer Compliance LLC was completed in October 2024. To complete the SSMP Audit, the following key elements were incorporated for the SSMP assessments:

- Evaluation of pre-Inspection questionnaire
- Interviews with IEUA collection management and field staff including both online and onsite conferences
- Completion of a Compliance Evaluation Inspection (CEI) incorporating standards and procedures utilized by U.S. EPA and the Water Boards to evaluate sanitary sewer system compliance (see Appendix 1)
- Review of the IEUA's Sewer System Management Plan (SSMP)
- Review of IEUA spill reports, system data, and other documentation
- Incorporation of guidelines and recommendations for SSMPs published by the Bay Area Clean Water Agencies (BACWA)² and available to all collection system agencies statewide as an industry standard practice publication on best practices for sanitary sewer operators.

² Available for download at: <https://bacwa.app.box.com/s/cucxst3w2c4fl53jopuyayt6b3u4xjs5/file/1489440015726>

IEUA Collection System Information

The IEUA owns and operates a regional sanitary sewer collection system (collection system) serving a population of approximately 935,000. The collection system consists of approximately 135 miles of gravity sewer mains and 11.3 miles of pressure (“force main”) sewers. Figure 1 below provides a map of the IEUA’s current sanitary sewer boundaries.

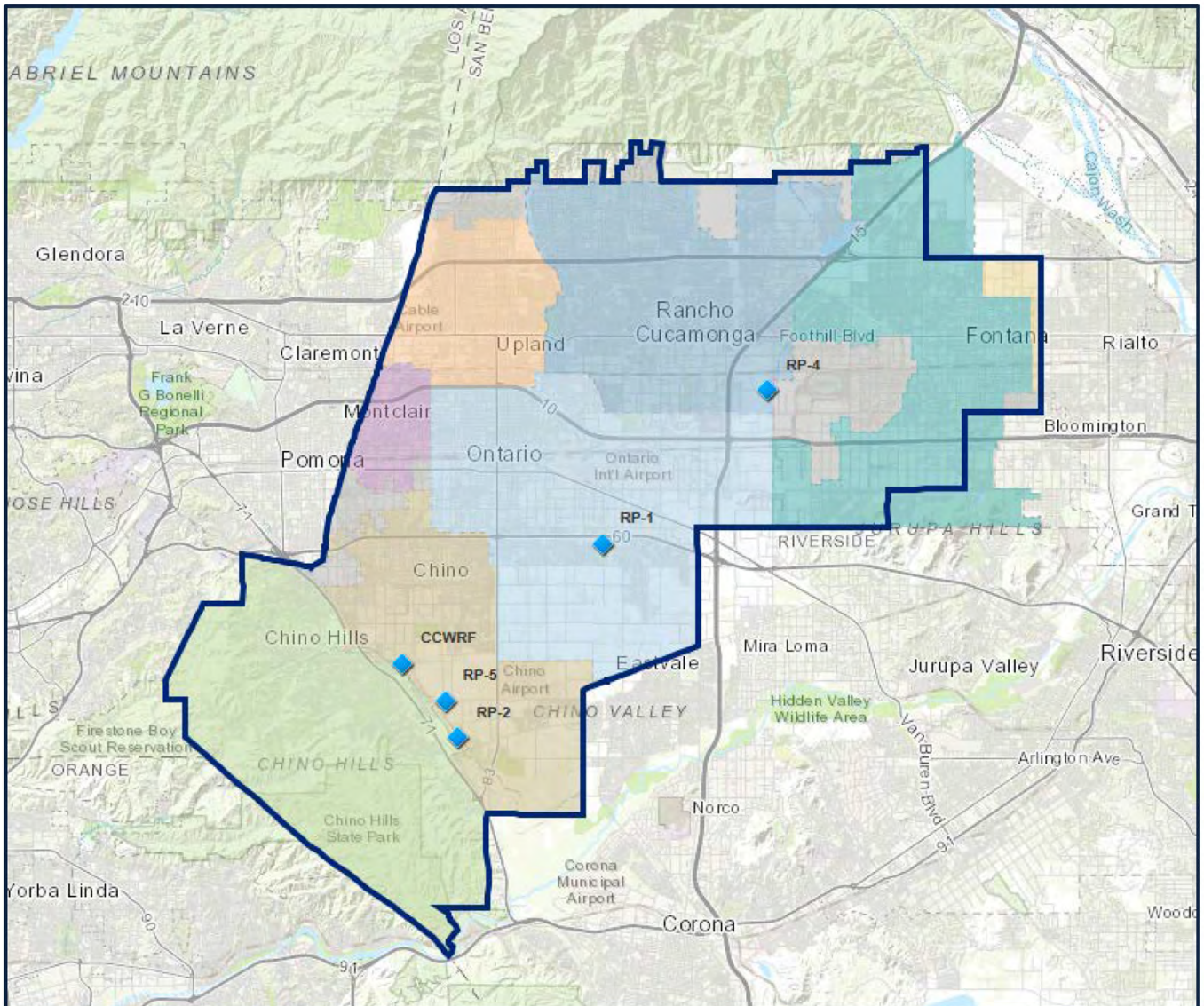


Figure 1 - IEUA Sewer Service Area Boundary Map

EXECUTIVE SUMMARY

Figure 2 below provides a current Facility At-A-Glance report generated for the IEUA contained in the State Water Board Database (CIWQS)³.

DRILLDOWN HISTORY: [\(BACK TO FACILITY LIST\)](#)
Place ID 631557

General Information						
Region	Place ID	Place Name	Place Type	Place Address	Place County	
8	631557	Inland Empire Utilities Agency CS	Collection_System	6075 Kimball Chino, CA, 91710	San Bernardino	

Related Parties							
Party	Party Type	Party Name	Role	Classification	Relationship	Start Date	Relationship End Date
642994	Person	Stephen Parker	Is A Data Submitter For			01/11/2024	
642938	Person	Robert A Delgado	Is Onsite Manager For			12/15/2023	
638440	Person	Lucia Fuertez Diaz	Is Onsite Manager For			11/14/2023	
640852	Person	Jeff Ziegenbein	Is Onsite Manager For			08/09/2023	09/03/2024
551396	Person	Richard Lao	Is A Data Submitter For			01/12/2023	10/24/2023
587087	Person	Kenneth Tam	Is Onsite Manager For			02/16/2022	
550623	Person	Pietro Cambiaso	Is Onsite Manager For			02/16/2022	
579900	Person	Christiana Daisy	Is Onsite Manager For			01/06/2020	
577654	Person	Eddie Lin	Is A Data Submitter For			04/16/2019	
587087	Person	Kenneth Tam	Is A Data Submitter For			11/07/2018	02/16/2022
520145	Person	Daniel Dyer	Pending-is a data submitter for			06/27/2018	
574578	Person	Kenneth Monfore	Is A Data Submitter For			03/08/2018	04/05/2023
541040	Person	Randy Lee	Is Onsite Manager For			02/06/2017	08/01/2023
550623	Person	Pietro Cambiaso	Is A Data Submitter For			04/02/2015	02/16/2022
546361	Person	Sylvie Lee	Is Onsite Manager For			05/21/2014	03/08/2022
544318	Person	Ernest Yeboah	Is Onsite Manager For			12/02/2013	04/11/2017
532535	Person	Chris Berch	Is Onsite Manager For			04/03/2012	05/31/2019
532721	Person	Craig Miller	Is Onsite Manager For			04/03/2012	09/03/2013
149707	Person	Bonita Fan	Is A Data Submitter For			04/10/2007	
353208	Person	Julio Im	Is A Data Submitter For			11/30/2006	
147335	Organization	Inland Empire Utilities Agency	Owner	Special District		11/29/2006	
285855	Person	Patrick Shields	Is Onsite Manager For			11/29/2006	03/15/2012

Total Related Parties: 22

Regulatory Measures								
Reg Measure ID	Reg Measure Type	Region	Program	Order No.	WDID	Effective Date	Expiration Date	Status Amended?
301042	Enrollee	8	SSOMUNILRG	2022-0103-DWQ	8SSO10580	10/10/2006		Active N

Total Reg Measures: 1

Violations							
Violation ID	Occurred Date	Violation Type	(-) Violation Description	Corrective Action	Status	Classification	Source
Report displays most recent five years of violations. Refer to the Interactive Violation Report for more data.							
Total Violations: 0				Priority Violations: 0			
*Click the "(+/-) Violation Description" link to expand and contract the violation description. *As of 5/20/2010, the Water Board's Enforcement Policy requires that all violations be classified as 1, 2 or 3, with class 1 being the highest. Prior to this, violations were simply classified as Yes or No. If a 123 classification has been assigned to a violation that occurred before this date, that classification data will be displayed instead of the Yes/No data.							

Violation Types

Enforcement Actions					
Enf Id	Enf Type	Enf Order No.	Effective Date	Status	
Total Enf Actions: 0					

Inspections						
Inspection ID	Inspection Type	Lead Inspector	Actual End Date	Planned	Violations	Attachment
1456969	B Type compliance inspection	Ken Theisen	07/24/2008	N	0	N/A

Total Inspections: 1 **Last Inspection: 07/24/2008**

The current report was generated with data as of: 10/25/2024
Regional Boards are in the process of entering backlogged data.
As a result, data may be incomplete.

Figure 2 - IEUA Facility At-A-Glance report (State Water Board Online Database, CIWQS 2024)

³California Integrated Water Quality System (CIWQS), available publicly at the following link:
<https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/CiwqsReportServlet?inCommand=drilldown&reportName=facilityAtAGlance&placeID=630701&reportID=7029229>

IEUA SSMP/Audit Due Dates

This section provides an overview of upcoming due dates for the IEUA to update its SSMP and complete its next SSMP Audit. Figure 4 below displays a summary of the upcoming due dates for the IEUA (5/2/2025 for its next SSMP Update and 11/2/2024 for the next SSMP Audit (6 months after the end of the required 3-year audit period which ended on 5/2/2024).

Sewer System Management Plan & Audit Required Due Dates Transition from General Order 2006-0003-DWQ to Reissued General Order

Search by Waste Discharge Identification (WDID) Number

Enter your Waste Discharge Identification (WDID) number in the search field to retrieve the required Sewer System Management Plan (SSMP) Update and Audit due dates for your system.

Show Update/Audit Dates

Sewer System Management Plan & Subsequent Update Due Dates					
System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
Inland Empire Utilities Agency CS	8SSO10580	5/2/2009	5/2/2014	5/2/2019	5/2/2025

Audit Due Dates								
System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
Inland Empire Utilities Agency CS	8SSO10580	5/2/2011	5/2/2013	5/2/2015	5/2/2017	5/2/2019	5/2/2021	5/2/2024

* Per Section 5.5 and Attachment E1, Section 3.11 of the General Order, Plan updates are due within six years after the required due date of the Enrollee's last Plan Update.

** Per Section 5.4 and Attachment E1, Section 3.10 of the General Order, the Audit Report is due within six months after the end of the required 3-year audit period.

Figure 3 - IEUA SSMP Update/Audit Due Dates (SWRCB website)

IEUA Spill Performance

This section provides an overview to showcase IEUA spill performance information, including trends and benchmarks to allow a comparison of the IEUA’s performance against other collection system agencies within the Santa Ana (Region 8) Water Board area and State. Numerous data sets and visualizations were created (see Figures 4-8 below and Appendix 2 for more additional detailed data visualizations generated with Microsoft Power BI).

As displayed in many of the visualizations, the IEUA’s spill rates and volumes discharged during the Audit period were consistently lower than many other sanitary sewer system agencies within the Santa Ana Regional Water Board (Region 8) area.

Additional spill performance details noted during the previous SSMP Audit can be found in Appendix 2.



Figure 4 - IEUA spill dashboard (2007-2024)

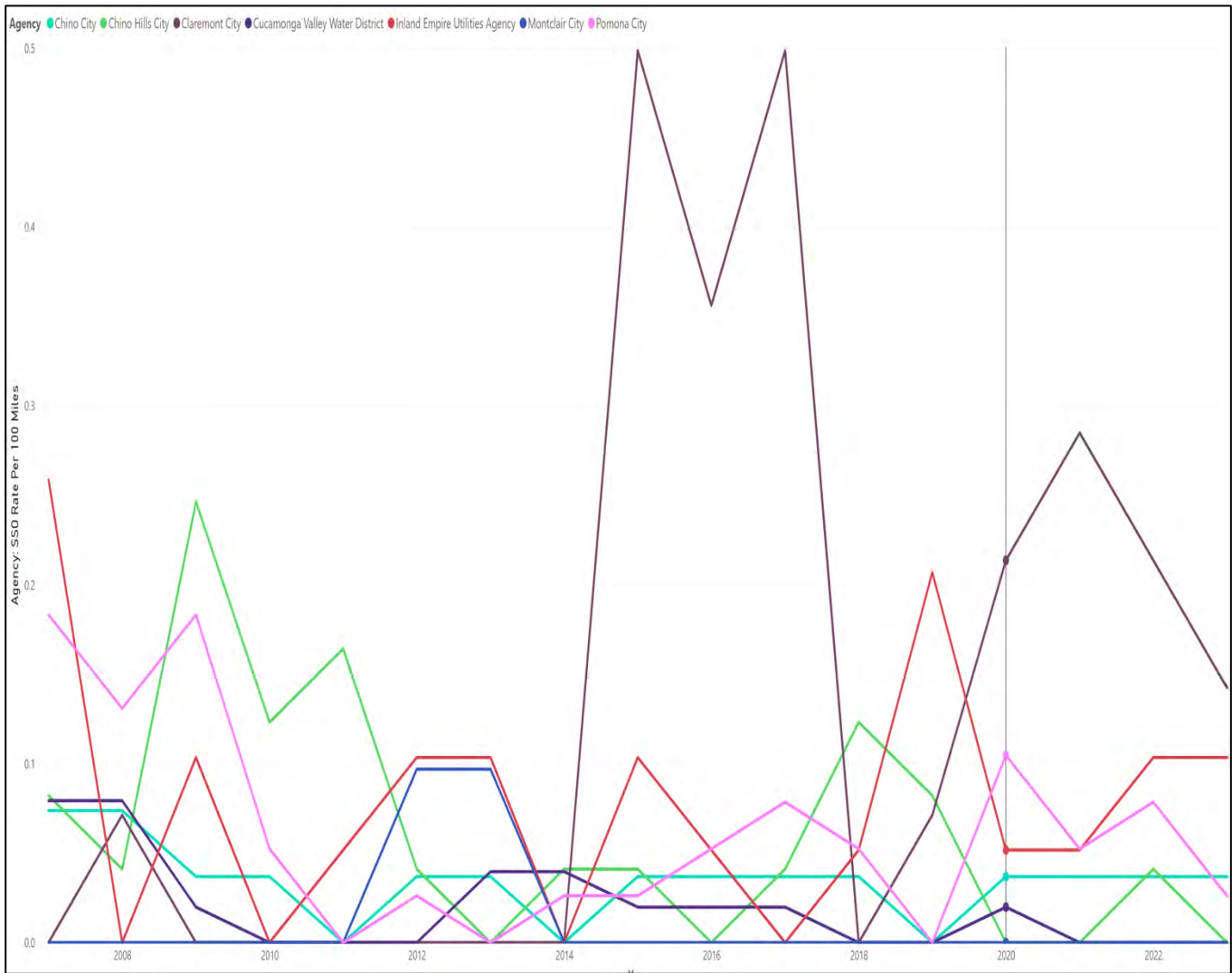


Figure 5 - IEUA Spill Rates (# of spills/100 miles) compared with other agencies during (2007-2024)

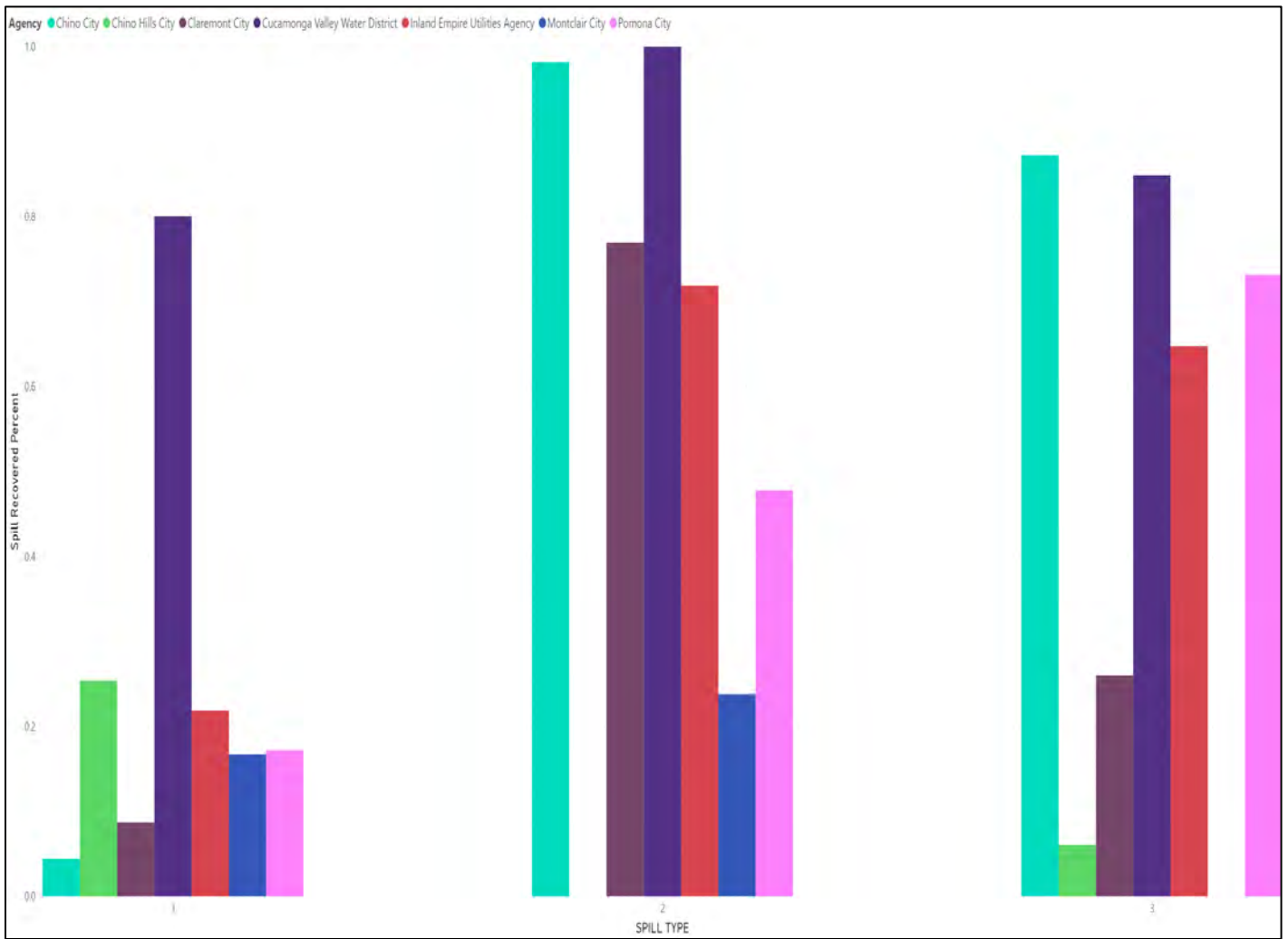


Figure 6 - IEUA spill recovery metrics (Cat 1/2/3 spills) compared with other agencies, 2007-2024

SSMP Audit Findings

This section provides a high-level summary of the SSMP Audit findings (see Tables 2 and 3 below) for incorporation into the IEUA's next SSMP Update due on or before 5/2/2025.

Table 1: Summary of IEUA SSMP Audit Findings (Reissued WDR, ATTACHMENTS)

SSMP AUDIT FINDINGS (ATTACHMENTS)				
Requirements	Potential Violations?	Areas of Concern?	Audit References	
Att. D-1	Goal & Intro	No	No	See WDR Recommendations (page 14)
Att. D-2	Organization	No	No	See WDR Recommendations (page 19)
Att. D-3	Legal Authority	No	No	See WDR Recommendations (page 22)
Att. D-4	O/M Program	No	Yes	See WDR Conformance + WDR Recommendations (page 24), WDR Recommendations (page 25)
Att. D-5	Design and Performance	No	No	See WDR Recommendations (page 28)
Att. D-6	Spill Emergency Response Plan (SERP)	No	Yes	See WDR Conformance (page 31), WDR Recommendations (page 31)
Att. D-7	Pipe Blockage Control Pgm.	No	No	See WDR Recommendations (page 35)
Att. D-8	SECAP	No	Yes	See WDR Conformance (page 38), WDR Recommendations (page 39)
Att. D-9	Monitoring, Measurement	No	No	See WDR Recommendations (page 40)
Att. D-10	Audits	No	No	See WDR Recommendations (page 43)
Att. D-11	Communications	No	No	See WDR Recommendations (page 44)
Att. E1	Notification, Monitoring, Reporting, Records	Yes	No	See WDR Conformance + WDR Recommendations (page 47)

Table 2: Summary of SSMP Audit Findings (Reissued WDR, SPECIFICATIONS)

SSMP AUDIT FINDINGS (SPECIFICATIONS)				
Requirements		Potential Violations? ⁴	Areas of Concern? ⁵	Audit References
Spec. 5.1	Designation of LRO	No	No	None
Spec. 5.2	SSMP Development, Implementation	No	Yes	See detailed findings below
Spec. 5.3	SSMP Updates	No	No	None
Spec. 5.4	SSMP Audits	No	No	See detailed findings below
Spec. 5.6	System Resilience	No	No	See detailed findings below
Spec. 5.10	Resources	No	Yes	See detailed findings below
Spec. 5.11	Performance Analysis	No	No	None
Spec. 5.12	Spill Emergency Resp. Plan	No	Yes	See detailed findings below
Spec. 5.13	Notif, Monitoring, Reporting, Records	Yes	No	See detailed findings below
Spec. 5.14	Notifications (private spills)	No	No	None
Spec. 5.15	Failure to report	No	No	None
Spec. 5.19	Proper O/M	No	Yes	See detailed findings below

⁴ V (Violation of [REISSUED WDR](#))

⁵ AOC (Area of Concern with [REISSUED WDR](#))

Audit Conclusions

The SSMP Audit completed by Fischer Compliance LLC in collaboration with IEUA management shed light on many existing successful work programs in place. When comparing the IEUA spill data/metrics performance with other collection systems in the Santa Ana Regional Water Board area, the IEUA performs near the top.

Detailed Auditing procedures incorporating review of questionnaires, the IEUA's existing SSMP, interviews and other data were relied on for generating the detailed Audit findings for documenting the IEUA's SSMP compliance, implementation, and effectiveness. To facilitate the project and improve effectiveness of the Audit process, the IEUA dedicated an internal staff person for managing the project, responding to questions/data requests, and provide regular communications to auditors in every phase of the project.

Several specific technical recommendations along with an implementation plan/schedule were generated for helping the IEUA get a jump start on updating its SSMP, several months ahead of schedule before its due date on 5/2/2025. The Audit also revealed several areas to provide an advantage to help prepare the IEUA for regulatory compliance inspections and improve SSMP effectiveness. This includes providing insights for the IEUA to reflect on additional ways for further improving existing work programs and spill reduction measures.

Appendix 1 contains a detailed Compliance Evaluation Inspection (CEI) report which provides the basis of many of the findings in the report. Appendix 2 provides a list of past SSMP Audit findings while Appendix 3 allows the IEUA and regulators to evaluate IEUA spill performance and other data to help compare the IEUA's performance against other collection systems in the Region. Appendix 4 helps the IEUA with a simplified checklist to demonstrate full implementation of the Audit findings, refine updating of the IEUA's next SSMP Update (due by 5/2/2025), and provide a roadmap of both required and recommended actions including short-term and long-term plans/schedules to be taken over the next several years.

PART 2 (Detailed Audit Findings/Recommendations)

This section provides detailed Audit findings and recommendations to provide an advantage for the IEUA to for streamlining its next SSMP Update required by the Reissued WDR. The procedures employed for this section include evaluating the IEUA’s sewer programs against each required SSMP element required in the Reissued WDR. Requirements are presented at the beginning for each element along with an analysis of IEUA compliance and implementation.

Additional information for helping IEUA managers measure SSMP effectiveness and provide resilience are also included for each SSMP element in this section. This information provides a strong foundation to help the IEUA with updating its SSMP, due by May 2, 2025. Each section ends with a checklist of common potential violations/areas and a checklist of findings including determination of compliance.

Element 1 – Goal And Introduction

1.1 Regulatory Context

“The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates.”

1.2 SSMP Update Schedule

“The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of sewer spills.”

1.3 Sewer System Asset Overview

“The IEUA Sewer System Management Plan must have an Introduction section to provide a description of the IEUA-owned assets and service area including but not limited to.

- Location, including county(ies).
- Service area boundary.
- Population and community served;
- System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons.
- Structures diverting stormwater to the sewer system.
- Data management systems.
- Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals.
- Estimated number or percent of residential, commercial, and industrial service connections.
- Unique service boundary conditions and challenge(s).
- Reference to the Enrollee’s up to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment.”

FINDINGS (Element 1: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Page 14	<ul style="list-style-type: none"> The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Page 14	<ul style="list-style-type: none"> 2021 Audit: Re-evaluate and assess goals (see App. 2) 2021 Audit: Reorganization of SSMP element (see App. 2) WDR RECOMMENDATION: To ensure compliance, the IEUA should annually review Element 1 entirely for ensuring all information is accurate and up to date.
EFFECTIVENESS	Page 14	<ul style="list-style-type: none"> WDR RECOMMENDATION: To help measure effectiveness and align with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Has the schedule for conducting audits been adhered to? Has the schedule for updating the Sewer System Management Plan been adhered to? Are established milestones being Monitored? Is the sewer system management program description up to date? Have audits been performed on schedule? Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)? Is asset data kept in the computerized maintenance management system, GIS, etc., programs up to date? Does the sewer system asset overview reference up to date maps?

ELEMENT 1 – GOAL AND INTRODUCTION

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
RESILIENCE	Page 14	<ul style="list-style-type: none"> • Recommendation: To help provide resilience, the IEUA should: <ol style="list-style-type: none"> 1. Create a work order report for auditing open work orders and assets for any repeat spill locations. 2. Implement a formal schedule for ensuring all WDR compliance deadlines are logged into management calendars.

FINDINGS (Element 1: WDR Violation/Areas of Concern Checklist⁶)

Potential Violations	Potential Violations?	Potential Areas of Concern?	IEUA In Compliance?
Failure to identify appropriate goals	No	No	Yes
Failure to update Sewer System Management Plan sub-elements	No	No	Yes
Failure to establish process for ensuring the general public has access/input to Sewer System Management Plan	No	No	Yes
Failure to complete appropriate Sewer System Management Plan audit	No	No	Yes
Failure to measure effectiveness and progress	No	No	Yes
Failure to develop and implement procedures for updating sewer maps	No	No	Yes
Failure to provide appropriate narrative descriptions describing procedures for prioritization of system repairs and maintenance to prevent spills.	No	No	Yes
Failure to describe technologies and practices to reduce spills	No	No	Yes

⁶ See SSMP Development Guide, available for download on the State Water Board’s Spill Reduction Website, available at: https://www.waterboards.ca.gov/water_issues/programs/sso/

Element 2 – Organization

REQUIREMENTS¹

“The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organizational chart of other similar narrative documentation that includes:

- The name of the Legally Responsible Official as required in section 5.1 (Designation of a Legally Responsible Official) of this General Order;
- The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan elements;
- Organizational lines of authority.
- Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. (For example, county health officer, county environmental health IEUA, and State Office of Emergency Services).”

FINDINGS (Element 2: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings (Potential Violations, Areas of Concern, and Recommendations)
COMPLIANCE	Pages 16-25	<ul style="list-style-type: none"> The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 16-25	<ul style="list-style-type: none"> The inspection revealed the IEUA is implementing this element.
EFFECTIVENESS	Pages 16-25	<ul style="list-style-type: none"> WDR RECOMMENDATION: Improve testing (at least annually) and documentation for after-hours spill notification system for 2025 SSMP Update WDR RECOMMENDATION: To help measure effectiveness and align with available industry standard guidance, the IEUA should check/verify the following, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Have there been instances when a service call for a spill was not properly routed to response personnel? Was all spill response activity documented/prepared for LRO? Have there been any changes in assigned responsibilities for implementing the Sewer System Management Plan? Is there a process in place for ensuring all contact information remains up to date? Is process established for ensuring org. chart is current?
RESILIENCE	Pages 16-25	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Designate more than one LRO to help ensure full and continuous coverage of duties. Ensure more than one staff member can implement and be responsible for specific Sewer System Management Plan elements. Periodically review contact information throughout this element for ensuring data is up to date.

FINDINGS (Element 2: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Potential Areas of Concern?	IEUA In Compliance?
Failure to properly secure Legally Responsible Official with appropriate training and experience.	No	No	Yes
Failure to establish and update all related necessary responsible staff and lines of authority.	No	No	Yes
Failure to establish and update IEUA chain of communication for reporting spills.	No	No	Yes

Element 3 – Legal Authority

REQUIREMENTS⁷

“The IEUA Sewer System Management Plan must include copies or an electronic link to the Enrollee’s current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority.”

- “Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that cause blockages.”
- “Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure.”
- “Require that sewer system components and connections be properly designed and constructed.”
- “Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee.”
- “Enforce violation(s) of ordinances, service agreements, or other legally binding procedures.”
- “Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.”

⁷ See Attachment D-3 of [Reissued WDR](#) (page D-4)

FINDINGS (Element 3: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Pages 26-30	<ul style="list-style-type: none"> The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 26-30	<ul style="list-style-type: none"> The inspection revealed the IEUA is implementing these requirements.
EFFECTIVENESS	Pages 26-30	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Annually review IEUA codes and ordinances for ensuring they are adequate in fulfilling all required legal requirements. Check for instances when the code/ordinance did not address a specific need/circumstance.
RESILIENCE	Pages 26-30	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Monitor performance of ordinances, codes, and agreements for deficiencies and omissions. Perform periodic review of ordinances, codes, and service agreements. Stay abreast of industry trends and local ordinances that may affect operations.

FINDINGS (Element 3: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Potential Areas of Concern?	IEUA In Compliance?
Failure to establish proper codes, standards, legal agreements, and procedures for ensuring conformance to requirements.	No	No	Yes

Element 4 – Operations and Maintenance Program

4.1 Updated Map of Sewer System

REQUIREMENTS⁸

“The Plan must include the items listed below that are appropriate and applicable to the Enrollee’s system.

An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s). The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries.”

4.2 Preventive Operation and Maintenance Activities

REQUIREMENTS²

“A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors.

The scheduling system must include:

- Inspection and maintenance activities, Higher-frequency inspections
- Maintenance of known problem areas including areas with tree root problems
- Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.

The data collection system must document the data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure.”

4.3 Training

REQUIREMENTS

“In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors.

The training must cover the requirements of this General Order; the Enrollee’s Spill Emergency Response Plan procedures and practice drills, skilled estimation of spill volume for field operators, and electronic CIWQS reporting procedures for staff submitting data.”

⁸ See Attachment D-4.1 of [Reissued WDR](#) (page D-4)

4.4 Equipment Inventory

REQUIREMENTS²

- “An inventory of sewer system equipment, including identification of critical replacement/spare parts.”

FINDINGS (Element 4: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Pages 31-43	The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 31-43	<p><u>WDR CONFORMANCE (AREAS OF CONCERN):</u> To improve implementation, the IEUA should address each of the following Areas of Concern (AOC) revealed during the Audit prior to completing the next SSMP Update.</p> <ul style="list-style-type: none"> • <u>AOC D1 (see Appendix 1, Table 11):</u> The inspection revealed the need for staff competency assessments/field reviews/checks by Supervisors for all field staff covering spill volume estimations, accuracy of field data collection, and adherence to District standard operating procedures (SOPs) and safe practices. • <u>AOC D3 (see Appendix 1, Table 11):</u> The inspection revealed the need for improvements for procedures to ensure all mapping issues identified by field operations staff are timely updated • <u>AOC D4 (see Appendix 1, Table 11):</u> The inspection revealed the need to further assess staffing/resources; comments from field staff operators suggested additional staffing resources could expand utilization of major sewer equipment sometimes not fully utilized and improve effectiveness of existing O/M work programs for cleaning and CCTV to further reduce spills. • <u>AOC D7 (see Appendix 1, Table 11):</u> The inspection revealed the need to develop a systematic O/M program for all force main air release valves (ARVs) for early detection of problems/prevention of failures/spills. • <u>2021 Audit:</u> Re-evaluate existing backup supplies, parts, and critical equipment inventory/list.

ELEMENT 4 – OPERATIONS & MAINTENANCE PROGRAM

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
EFFECTIVENESS	Pages 14-24	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Were all map updates completed in a timely manner? 2. Are staff trained for providing map update information? 3. Are newly installed assets incorporated into maps? 4. Are IEUA maintenance, operations, engineering work orders periodically reviewed for completeness? 5. Does the IEUA monitor “open” or “overdue” work orders? 6. Are inspection and maintenance activities reducing the number and volume of spills? 7. Is maintenance work being completed as scheduled? 8. Are inspections of pipes, manholes, and lift completed? 9. Does the IEUA have a proactive root control program? 10. Has all training been completed as scheduled? 11. Have consistent training records been maintained? 12. Have staff demonstrated ability/knowledge after trainings? 13. Have contractors received, at a minimum, direction for 1) reporting spills, containment, securing sites? 14. Has the inventory list been audited as scheduled? 15. Have any inventory deficiencies or omissions been discovered?
RESILIENCE	Pages 14-24	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Develop a Standard Operating Procedure (SOP) for updating maps when errors are discovered. 2. Develop and use forms (paper or electronic) for data collection through inspections for ensuring all pertinent information is consistently collected. 3. Periodically evaluate inspection intervals to help ensure they are optimized. 4. Require staff to demonstrate ability and/or knowledge for all training activities. 5. Monitor equipment and critical spare parts usage for and trends. 6. Ensure cross-training for CIWQS Data Submitters for ensuring more than one staff member can collect/manage all required spill data and meet all required deadlines specified in Attachment E1 of the Reissued WDR.

FINDINGS (Element 4: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Potential Areas of Concern?	IEUA In Compliance?
Failure to establish process for ensuring sewer maps are up to date.	No	No	Yes
Failure to establish and review required maintenance program activities (CCTV, inspections, etc.)	No	No	Yes
Failure to establish adequate training program for staff and contractors.	No	No	Yes
Failure to establish equipment inventory including identification of critical spare parts.	No	No	Yes

Element 5 – Design and Performance Provisions

5.1 Updated Design Criteria and Construction Standards

REQUIREMENTS⁹

“The Plan must include the following items as appropriate and applicable to the Enrollee’s system.”

- “Updated design criteria, and construction standards and specifications, for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic Capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria.”

5.2 Procedures and Standards

REQUIREMENTS¹

- “Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.”

⁹ See Attachment D-5.1 of [Reissued WDR](#) (page D-5)

FINDINGS (Element 5: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Pages 44-45	<ul style="list-style-type: none"> The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 44-45	<ul style="list-style-type: none"> The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Pages 44-45	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Does the IEUA implement its current design and construction standards, specifications, and inspection procedures? Does the IEUA periodically review design and construction standards, specifications, and inspection procedures for ensuring conformance to requirements? Does the IEUA have a review process for its standards and procedures? Were any design or installation deficiencies found during warranty inspections? Are hydraulic model findings included in the design process? Does the IEUA stay abreast of industry design standards?
RESILIENCE	Pages 44-45	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Staying abreast of industry trends and standards. Performing warranty inspections of newly installed or repaired assets to evaluate design and installation practices. Evaluating as-built changes for trends and areas for design and performance improvements.

FINDINGS (Element 5: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	IEUA In Compliance?
Failure to establish, implement, and maintain appropriate sewer standards and procedures for inspections, and testing.	No	No	Yes
Failure to enforce instances of noncompliance.	No	No	Yes

Element 6 – Spill Emergency Response Plan

REQUIREMENTS¹⁰

The Plan must include an up-to-date Spill Emergency Response Plan to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to meet all the following.

- “Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner.
- Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State.
- Comply with the notification, monitoring and reporting requirements of this General Order, State law and regulations, and applicable Regional Water Board Orders.
- Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained.
- Address emergency system operations, traffic control and other necessary response activities.
- Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system.
- Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State.
- Remove sewage from the drainage conveyance system.
- Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters.
- Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery.
- Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event.
- Conduct post-spill Guidance of spill response activities.
- Document and report spill events as required in this General Order.
- Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.”

¹⁰ See Attachment D-6 of [Reissued WDR](#) (page D-6)

FINDINGS (Element 6: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Pages 46-48, App. E	<ul style="list-style-type: none"> The inspection revealed the IEUA is in compliance with these requirements.
IMPLEMENTATION	Pages 46-48, App. E	<p>WDR CONFORMANCE (AREAS OF CONCERN): To improve implementation, the IEUA should address each of the following Area of Concern (AOC) revealed during the Audit prior to completing the next SSMP Update.</p> <ul style="list-style-type: none"> AOC (Pump Station Emergency Containment Plans): The Audit revealed IEUA lacks individual emergency response containment plans for each of its sanitary sewer pump stations for ensuring proactive emergency preparedness and effective emergency response operations for spills. AOC Training/Records: The Audit revealed the IEUA could further improve its existing Spill Emergency Response Plan training/records for internal field staff/contractors expanding on training content, competency checks, and trainer qualifications. The IEUA should incorporate upgrades to its training records into its SSMP Change Log and 2025 SSMP Update.
EFFECTIVENESS	Pages 46-48, App. E	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Check to ensure the IEUA is implementing all recommendations for spill emergency response plans incorporated in SSMP Guidance Manual (see pages 35-39). Does the agency implement an effective Spill Emergency Response Plan?

<p>RESILIENCE</p>	<p>Pages 46-48, App. E</p>	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Provide training on a regular basis for all spill response staff. Training should include: 2. Determining Spill Start Time 3. Determining spill volume and volume recovered. 4. Data Collection (forms) 5. Containment and clean up. 6. CIWQS Data Submitting 7. Develop a training plan for contracted services. 8. Periodically review post-spill assessments for trends and areas for improvement.
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FINDINGS (Element 6: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	IEUA In Compliance?
Failure to develop and implement a Spill Emergency Response Plan that meets all requirements.	No	No	Yes
Failure to test/evaluate emergency procedures during including deploying contracted services where necessary.	No	No	Yes
Failure for ensuring supply of adequate critical/identified spare parts/equipment prior to spills.	No	No	Yes
Failure to properly notify appropriate outside agencies/officials.	No	No	Yes
Failure to comply with Monthly No Spill Certifications	No	No	Yes

Element 7 – Sewer Pipe Blockage Control Program

REQUIREMENTS¹¹

“The Sewer System Management Plan must include procedures for the evaluation of the Enrollee’s service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags, and debris. If the Enrollee determines that a program is not needed, the Enrollee shall provide justification in its Plan for why a program is not needed. The procedures must include, at minimum:

- An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances.
- A plan and schedule for the disposal of pipe-blocking substances generated within the sanitary sewer system service area. This includes a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of substances generated within a sanitary sewer system service area.
- The legal authority prohibits discharges to the system and identifies measures to prevent spills and blockages.
- Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping, and reporting requirements.
- Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the fats, oils, and grease ordinance.
- An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and
- Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above.”

¹¹ See Attachment D-7 of [Reissued WDR](#) (page D-7)

FINDINGS (Element 7: Analysis)

Areas Assessed	SSMP Refs.	Audit Findings/Recommendations
COMPLIANCE	Pages 49-50	<ul style="list-style-type: none"> The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 49-50	<ul style="list-style-type: none"> The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Pages 49-50	<ul style="list-style-type: none"> <u>2021 Audit</u> - More communication with member agencies on FOG control program/practices and handling of problems/issues WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Have there been any blockages/spills from any identified problem area? Is the agency receiving feedback on public outreach efforts? Is the debris and other sewage solids collected during cleaning activities being disposed of appropriately? Does the agency have a plan and schedule for inspection of grease producing facilities? Was the schedule adhered to? Have there been spills due to excessive fats, oil, or grease in the system? Are Source Control staff included in the plan check process?
RESILIENCE	Pages 49-50	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Inspect assets directly downstream of grease producing businesses to- ensure source control is effective. Develop outreach doorhangers or flyers to perform targeted outreach when discoveries are made in the field. Perform regular assessments of system assets to monitor performance. Establish a QA/QA process for evaluating pipe cleaning effectiveness.

FINDINGS (Element 7: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	IEUA In Compliance?
Failure to identify appropriate needs for pipe blockage program.	No	No	Yes
Failure for ensuring adequate pipe blockage control enforcement authority.	No	No	Yes
Failure to establish residential FOG outreach	No	No	Yes
Failure to enforce requirements for instances of noncompliance.	No	No	Yes

Element 8 – System Evaluation, Capacity Assurance, Capital Improvements

REQUIREMENTS

“The Plan must include procedures and activities for

- Routine evaluation and guidance of system conditions,
- Capacity guidance and design criteria.
- Prioritization of corrective actions.
- Capital improvement plan.”

8.1. System Evaluation and Condition Guidance

REQUIREMENTS¹²

“The Plan must include procedures to:

- Evaluate the sanitary sewer system assets utilizing the best practices and technologies available.
- Identify and justify the amount (percentage) of its system for its condition to be assessed each year.
- Prioritize the condition Guidance of system areas that:
- Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, Capacity issues, or other system deficiencies.
- Are in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas.
- Are within the vicinity of a receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List.
- Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods.
- Utilize observations/Audit Findings/Recommendations of system conditions that contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State.
- Maintain documents and recordkeeping of system evaluation and condition Guidance inspections and activities,
- Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to sea level rise; flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions.”

¹² See Attachment D-8.1 of [Reissued WDR](#) (pages D-7 and D-8)

FINDINGS (Element 8: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Pages 51-57	<ul style="list-style-type: none"> The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 51-57	<p><u>WDR CONFORMANCE (AREAS OF CONCERN):</u> To improve implementation, the IEUA should address each of the following Area of Concern (AOC) revealed during the Audit prior to completing the next SSMP Update.</p> <ul style="list-style-type: none"> <u>AOC D2 (see Appendix 1, Table 11):</u> The inspection revealed that improvements to existing manhole inspection program (resources, data collection/tracking) vs. only documenting known problems when discovered during cleaning/CCTV are needed. <u>AOC D5 (see Appendix 1, Table 11):</u> Budgeting/Capital Improvements: field operators noted during the onsite inspection that budgeting issues have sometimes impacted necessary improvement projects including lining of siphons. <u>AOC D6 (see Appendix 1, Table 11):</u> Engineering/management: commented on need for reducing workloads or adding additional staffing since due to current capital project completion rates of approximately 60% (rates normally hover 70-80% completion). <u>Climate Impacts/Vulnerabilities:</u> The Audit revealed the IEUA should expand its assessment of areas in the system potentially vulnerable to climate impacts. These enhancements could be considered for inclusion in the next SSMP Update once implemented.

EFFECTIVENESS	Pages 34-40	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Number of Capacity-related spills or surcharge condition during the audit period? 2. Has the system responded to rain events as indicated by the hydraulic model? 3. Has there been any changes to zoning designations (residential, commercial, industrial)? 4. Rain event trends: Has there been changes in rain event occurrences, intensity, and duration? 5. Has the agency’s capital improvement plan been adhered to? 6. Is there an annual review of the Capital Improvement Plan by all necessary individuals? 7. Has the IEUA adhered to its system evaluation/condition assessment efforts? Measured by annual review and update of system inspections/evaluations procedures. 8. Has the IEUA adhered to its prioritization/corrective actions for sewer repair and Capacity improvement projects? Measured by annual review and agency prioritization/corrective actions procedures.
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FINDINGS (Element 8: Potential WDR Violations/Areas of Concern Evaluation Evaluation)

Potential Violations	Potential Violations?	Areas of Concern?	IEUA In Compliance?
Failure to develop and implement system evaluation, Capacity assurance, and capital improvement programs.	No	No	Yes
Failure to identify sections holding high degree of environmental consequences if vulnerable to collapse, failure, blockage, Capacity issues, or other system deficiencies.	No	No	Yes
Failure to identify sections located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas.	No	No	Yes
Failure to identify assets within the vicinity of receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List.	No	No	Yes
Failure to develop and implement capital improvement plan (CIP) for necessary sewer system repairs and improvements (short term and long-term).	No	No	Yes

Element 9 – Monitoring, Measurement, Program Modifications

REQUIREMENTS¹³

“The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:

- Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities.
- Monitoring the implementation and measuring the effectiveness of each Plan Element.
- Assessing the success of the preventive operation and maintenance activities.
- Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and
- Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes.”

FINDINGS (Element 9: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Page 58	<ul style="list-style-type: none"> • The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Page 58	<ul style="list-style-type: none"> • The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Page 58	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Are trends being monitored and corrective action taken as necessary? 2. Have Key Performance Indicators been developed to measure the effectiveness of each Sewer System Management Plan element? 3. Has a plan and schedule been established to address audit findings/deficiencies? 4. Have changes been made to work programs and procedures because of monitoring efforts?
RESILIENCE	Page 58	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> 1. Develop key performance indicators to measure effectiveness of the Sewer System Management Plan. 2. Perform periodic reviews of the Sewer System Management Plan to help ensure the plan is being properly implemented. 3. Develop and adhere to a timeline to correct deficiencies found during the audit process. 4. Periodically evaluate work programs to help ensure effectiveness.

¹³ See Attachment D-9 of [Reissued WDR](#) (page D-9)

FINDINGS (Element 9: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations	Areas of Concern	IEUA in Compliance?
Failure to collect/maintain and evaluate relevant data for monitoring, measuring, and assessing preventive maintenance program effectiveness.	No	No	Yes
Failure to update/modify agency Sewer System Management Plan based on results from audits and evaluation of data required for this element.	No	No	Yes

Element 10 – Internal Audits

REQUIREMENTS¹⁴

“The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the Enrollee to comply with section 5.4 (Sewer System Management Plan Audits) of this General Order.”

- Specifications 5.4 (Sewer System Management Plan Audits)

“The Enrollee shall conduct an internal audit of its Sewer System Management Plan, and implementation of its Plan, at a minimum frequency of once every three years. The audit must be conducted for the period after the end of the Enrollee’s last required audit period. Within six months after the end of the required 3-year audit period, the Legally Responsible Official shall submit an audit report into the online CIWQS Sanitary Sewer System Database per the requirements in section 3.10 (Sewer System Management Plan Audit Reporting Requirements) of Attachment E1 of this General Order. Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff. The internal audit shall be appropriately scaled to the size of the system(s) and the number of spills. The Enrollee’s sewer system operators must be involved in completing the audit. At minimum, the audit must:

- Evaluate the implementation and effectiveness of the Enrollee’s Sewer System Management Plan in preventing spills.
- Evaluate the Enrollee’s compliance with this General Order.
- Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and
- Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.
- The Enrollee shall submit a complete audit report that includes:
 - Audit findings and recommended corrective actions.
 - A statement that sewer system operators’ input on the audit findings has been considered; and
 - A proposed schedule for the Enrollee to address the identified deficiencies.”

¹⁴ See Attachment D-10 of [Reissued WDR](#) (page D-10)

FINDINGS (Element 10: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Page 59	<ul style="list-style-type: none"> The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Page 59	<ul style="list-style-type: none"> The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Page 59	<ul style="list-style-type: none"> WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> Have audits been performed as required? Have the audits assessed compliance, implementation, and effectiveness? Have deficiencies been identified? Has a plan and schedule to rectify the deficiencies been established?
RESILIENCE	Page 59	<ul style="list-style-type: none"> WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any changes in the next required SSMP update: <ol style="list-style-type: none"> Periodically evaluate key performance indicators to assess effectiveness of each Sewer System Management Plan element. Evaluate previous audit findings for ensuring deficiencies have all been addressed/rectified. Calendar the audit due dates and complete the audit on time. Prepare for announced/unannounced compliance inspections by regulators and by proactive with preparing required Audits by completing the State Water Board Pre-Inspection Questionnaire (see Appendix 1).

FINDINGS (Element 10: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations	Areas of Concern	IEUA in Compliance?
Failure to conduct routine Sewer System Management Plan audits.	No	No	Yes
Failure to measure Sewer System Management Plan element effectiveness (a simple checklist will not fulfill this obligation).	No	No	Yes
Failure to implement identified deficiencies/recommendations and commit to new enhancements via a plan/schedule (short and long-term).	No	No	Yes

Element 11 – Communication Program

REQUIREMENTS¹⁵

“The Plan must include procedures for the Enrollee to communicate with:

- The public for spills and discharges resulting in closures of public areas, or that enter a source of drinking water, and the development, implementation, update of its Plan, including opportunities for public input to Plan implementation and updates.
- Owners/operators of systems that connect into the Enrollee’s system, including satellite systems, for system operation, maintenance, and capital improvement-related activities.”

FINDINGS (Element 11: Analysis)

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
COMPLIANCE	Pages 60-63	<ul style="list-style-type: none"> • The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 60-63	<ul style="list-style-type: none"> • The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Pages 60-63	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To measure effectiveness and ensure alignment with available industry standard guidance, the IEUA should check/verify the following data for inclusion in its next required SSMP update: <ol style="list-style-type: none"> 1. Does the agency place all Sewer System Management Plan action items on the agenda for regular counsel/board meetings? 2. Does the agency have signage, or other means, readily available to notify the public of env. or public risk factors related to a sewage spill? 3. Does the agency regularly communicate with other systems connected to the system? 4. Was the public afforded the opportunity to provide input as the program was being implemented? 5. Does the agency perform outreach to residential customers?
RESILIENCE	Pages 60-63	<ul style="list-style-type: none"> • WDR RECOMMENDATION: To provide resilience and align with available industry standard guidance, the IEUA should check/verify the following data, make adjustments as necessary, and include any Use the Sewer System Management Plan as a tool to communicate to the public how the agency is managing the system. <ol style="list-style-type: none"> 1. Maintain a consistent presence in the service area by attending community events or issuing periodic newsletters or other communications to the public. 2. Make it clear and easy for the public to contact the agency.

¹⁵ See Attachment D-11 of [Reissued WDR](#) (page D-10)

FINDINGS (Element 11: Potential WDR Violations/Areas of Concern Evaluation)

Potential Violations	Potential Violations	Areas of Concern	IEUA in Compliance?
Failure to develop and implement a public communication program, especially during emergencies.	No	No	Yes
Failure to solicit input on Sewer System Management Plan content.	No	No	Yes
Failure to communicate with owners/operators of sewer system(s) connected to the agency’s sewer system.	No	No	Yes

Attachment E1 – Notification, Monitoring, Reporting, Record Keeping

REQUIREMENTS¹⁶

The Notification Requirements (section 1), Spill-specific Monitoring Requirements (section 2), Reporting Requirements (section 3) and Recordkeeping Requirements (section 4) in this Attachment are pursuant to Water Code section 13267 and section 13383, and are an enforceable component of this General Order.

For the purpose of this General Order, the term:

- Notification means the notifying of appropriate parties of a spill event or other activity.
- Spill-specific Monitoring means the gathering of information and data for a specific spill event to be reported or kept as records.
- Reporting means the reporting of information and data into the online California Integrated Water Quality System (CIWQS) Sanitary Sewer System Database.
- Recordkeeping means the maintaining of information and data in an official records storage system. Failure to comply with the notification, monitoring, reporting and recordkeeping requirements in this General Order may subject the Enrollee to civil liabilities of up to \$10,000 a day per violation pursuant to Water Code section 13385; up to \$1,000 a day per violation pursuant to Water Code section 13268; or referral to the Attorney General for judicial civil enforcement. Water Code section 13193 et seq. requires the Regional Water Quality Control Boards (Regional Water Boards) and the State Water Resources Control Board (State Water Board) to collect sanitary sewer spill information for each spill event and make this information available to the public. Sanitary sewer spill information for each spill event includes but is not limited to: Enrollee contact information for each spill event, spill cause, estimated spill volume and factors used for estimation, location, date, time, duration, amount discharged to waters of the State, response and corrective action(s) taken.

¹⁶ See Attachment D-11 of [Reissued WDR](#) (page D-10)

FINDINGS (Attachment E1: Analysis)

WDR CONFORMANCE (POTENTIAL VIOLATIONS): To improve implementation, the IEUA should address each of the following Area of Concern (AOC) revealed during the Audit prior to completing the next SSMP Update including development of improved internal procedures for ensuring notification and reporting deadlines are not missed to avoid future violations of the Reissued WDR.

Spill Notification/Reporting Compliance:

- 4 instances of missing 2-hour (120 minute) Category 1 spill notification requirement to Cal-OES
 - May 2, 2007 (1,484 minutes, + 2,364 minutes over requirement)
 - July 15, 2009 (145 minutes, +25 minutes over requirement)
 - April 3, 2012 (184 minutes, +64 minutes over requirement)
 - Nov 25, 2019 (153 minutes, +33 minutes over requirement)
- 0 instances of missing Draft 3 business day Category 1 spill report to CIWQS (100% compliance)

LIST OF APPENDICIES

APPENDIX 1 – IEUA Compliance Evaluation Inspection (CEI) Report

APPENDIX 2 – IEUA Previous SSMP Audit Findings

APPENDIX 3 – IEUA Spill Performance Benchmark Report

APPENDIX 4 – IEUA SSMP Audit Implementation Plan and Schedule

APPENDIX 5 – IEUA Key Performance Indicator (KPIs)

APPENDIX 6 – IEUA List of Spills (2007-2024)



COMPLIANCE EVALUATION INSPECTION REPORT

Prepared by:



Sanitary Sewer
Collection System
WDID=8SSO10580

Table of Contents

1. Introduction	3
2. Inspection Summary	4
3. Inspection Steps.....	4
4. Inspection Tasks.....	4
5. Task A (Field Inspection – Fontana Interceptor Siphon)	6
6. Task B (Field Inspection - San Bernardino Lift Station)	9
7. Task C (Field Inspection – Regional Force Main Improvement Project)	11
8. Task D (Corp Yard Inspection + Audit Conference)	13
9. Findings and Recommendations	18
10. Conclusions	19

List of Tables

Table 1 – Inspection Summary (Areas of Concern, AOCs).....	4
Table 2 – List of inspection Tasks	5
Table 3 – Task A (Best practices identified during inspection).....	8
Table 4 – Task A (Potential Violations and Areas of Concern).....	8
Table 5 – Task B (Best practices identified during inspection)	10
Table 6 – Task B (Potential Violations and Areas of Concern).....	10
Table 7 – Task C (Best practices identified during inspection)	12
Table 8 – Task C (Potential Violations and Areas of Concern).....	12
Table 9 – Task D (Best practices identified during inspection).....	16
Table 10 – Task D (Potential Violations and Areas of Concern)	17
Table 11 – Inspection Findings and Recommendations	18

1. Introduction

On October 3, 2024, James Fischer (Fischer Compliance LLC) and Sam Rose (Sam Rose Consulting) conducted a Compliance Evaluation Inspection (CEI) of the Inland Empire Utilities Agency (Agency) sanitary sewer system to evaluate compliance with the Statewide Sanitary Sewer Systems General Order ([Order No. 2022-0103-DWQ](#)), hereafter “Reissued WDR¹.”

FACILITY INSPECTED:		INSPECTED BY:	
Inland Empire Utilities Agency 6075 Kimball Ave Chino, CA 91708		James Fischer, P.E. NPDES Compliance Inspector ² Principal, FISCHER COMPLIANCE, LLC <i>James Fischer</i> Date: 10/3/2024	
SANITARY SEWER COLLECTION SYSTEM (WASTEWATER)		Waste Discharge ID (WDID): #8SSO10580	
Water Quality Order(s)	2022-0103-DWQ (Reissued WDR)		
Regional Water Board	8 (Santa Ana River Basin)		
County	San Bernardino		
Service Area Population	935,000		
Miles of Sewers (gravity)	135		
Miles of Sewers (force mains)	11.3		
Miles not accessible for O/M	0		
Above ground pipelines, gravity (#)	15		
Above ground pipelines, force mains (#)	1		
Sewer siphons (#)	41		
Sewer lower later responsibility (Y/N)	N		
Satellite Sewer System	OCSD (WDID 8SSO10640) and LACSD (WDID 4SSO11400)		
Next SSMP Audit (due to CIWQS)	11/2/2024 ³		
FACILITY REPRESENTATIVE	TITLE	CONTACT	
Lucia Diaz	Manager/Facilities & Water System Pgm.	(909) 993-1631	
Edward Makowski	Collection System Supervisor	(909) 993-1600	

¹ See https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0103-dwq.pdf

² Credentialed, U.S EPA 2017

³ See https://www.waterboards.ca.gov/water_issues/programs/sso/lookup/

2. Inspection Summary

The inspection incorporated both a pre-inspection meeting and onsite field inspections for comprehensively assessing the Agency's SSMP compliance, implementation, and effectiveness with the Reissued WDR (see inspection summary presented in Table 1 below). This information provides a key advantage for helping Agency managers proactively reflect on ways for further improving its and implementing necessary adjustments to existing programs for preparing for its required SSMP Audit due by 11/2/2025.

A summary of the Agency's overall scores with compliance and implementation of the Reissued WDR based on the inspection is provided in Table 1 below including key identified Areas of Concern (AOC).

Table 1 – Inspection Summary (Areas of Concern, AOCs)

Observation	Area Assessed	Details/Findings	Related WDR Reqs.	Compliant (0-5)	Implementing (0-5)	City Score
AOC A1	Staffing, resources	Vacancies.open positions (operations)	Spec. 5.7, Att. D-4	3	4	70%
AOC A2	Backup/spare parts	Backup supplies, inventory	Spec. 5.19, Att. D-4	3	4	70%
AOC A3	Inspections	CCTV (pipelines)	Att. D-8	5	5	100%
AOC A4	Capital Improvement projects	Planning/execution/completion	Spec. 5.19, Att. D-8	4	4	80%
AOC A5	SERP training	Spill Emergency Response Plan training	Att. D-8	5	5	100%
AOC A6	Procedures	Standard Operating Procedures (SOPs)	Spec. 5.19, Att. D-4	4	4	80%
AOC A7	Upstream manholes	Upstream manhole ID at all pump stations	Spec. 5.19, Att. D-4	4	4	80%
AOC A8	Work Orders	Overdue work orders & tracking	Spec. 5.19, Att. D-4	4	4	80%
AOC A9	Spill Records	Quality/documentation	Spec. 5.19, Att. D-4	4	4	80%
					Average	82%

3. Inspection Steps

The inspection incorporated the following steps:

1. Desktop document review (Agency SSMP, spill data)
2. Pre-Inspection Conference
3. Review of Agency's completed State Water Board Pre-Inspection Questionnaire v4 (see **Attachment 1**)
4. Compliance Evaluation Inspection (CEI), interviews and inspection of select field assets
5. Post-Inspection review

4. Inspection Tasks

The inspection incorporated the following key tasks for evaluating the Agency's SSMP compliance, implementation, and effectiveness with the Reissued WDR (see Table 2 below).

Table 2 – List of inspection Tasks

Task	Description	Areas Assessed	SSMP Elements
A	Marlay Ave/Fontana Interceptor Cleaning 34°02'30.7"N 117°30'53.6"W	<ul style="list-style-type: none"> O/M, Cleaning Program, Traffic Control & Safety, Training Program, Field Operator Interviews/Competency Checks 	<ul style="list-style-type: none"> Att. D-4 Att D-6
B	San Bernardino Lift Station, 34°04'35.7"N 117°30'20.0"W	<ul style="list-style-type: none"> O/M, Procedures, Emergency Preparedness & Emergency Response Operations 	<ul style="list-style-type: none"> Att. D-4 Att D-6
C	Regional Force Main Improvement Project 34°04'48.36"N 117°31'26.22"W	<ul style="list-style-type: none"> Inspection of dual redundant force main manholes at construction site with contractor to help agency gain access to force main for cleaning, maintenance and condition assessment. 	<ul style="list-style-type: none"> Att. D-4 Att D-8
D	Audit Conference Corp Yard, Regional Plant No. 4 12811 6 th Street Rancho Cucamonga, CA	<ul style="list-style-type: none"> Organization/staffing/vacancies Inspections and cleaning programs Fats, oils, and grease (FOG) and root control programs Capital improvement program (CIP) Training program Spill Emergency Response Implementation Standard Operating Procedures Audit of backup supplies, emergency & spare parts Management and field operator interviews 	<ul style="list-style-type: none"> Att. D-2 Att. D-4 Att. D-7 Att. D-8 Att. D-4 Element 4 Element 6 Element 6 Element 6 Att. D-6

5. Task A (Field Inspection – Fontana Interceptor Siphon)

This task included a detailed interviews with the Agency’s Collection System Supervisor and field crew assessing routine (monthly) cleaning operations and staff training/competency (see photos, A1-A8 below).



Task A (Photo A1): View looking south arriving at Fontana Interceptor Siphon location with IEUA management.



Task A (Photo A2): Aerial view of Fontana Interceptor siphon location adjacent to San Bernardino County Flood Control Channel.



Task A (Photo A3): View of San Bernardino County Flood Control Channel signage with public phone number.



Task A (Photo A4): View of IEUA combination truck preparing for siphon cleaning operations facing west in roadway with traffic control measures in place.



Task A (Photo A5): View looking east at Fontana Interceptor Siphon location during cleaning operations.



Task A (Photo A5): Inspection of Siphon manhole.



Task A (Photo A7): View west of siphon cleaning site.



Task A (Photo A8): View of IEUA markings noting flow direction and distance of pipeline segment to alert field operators.

A list of Best Practices (BPs) identified during Task A of the inspection is presented in Table 3 below.

Table 3 – Task A (Best practices identified during inspection)

TASK A	Best Practices (BPs)	SSMP Elements
(Fontana Interceptor Siphon)	<ul style="list-style-type: none"> BP A1: Extensive siphon maintenance program. 	<ul style="list-style-type: none"> Element 4 (Att. D-4)
	<ul style="list-style-type: none"> BP A2: Upgraded combination vehicles 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Element 6 (Att. D-6)
	<ul style="list-style-type: none"> BP A3: Extensive closed-circuit television (CCTV) inspections and flushing efforts being performed throughout entire system to support capital improvement program/reduce spills 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Element 8 (Att. D-8)
	<ul style="list-style-type: none"> BP A4: Enhanced Hot Spot Reduction Program 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Element 8 (Att. D-8)

list of Potential Violations (PVs) and Areas of Concern (AOC) identified during Task A of the inspection are presented in Table 4 below.

Table 4 – Task A (Potential Violations and Areas of Concern)

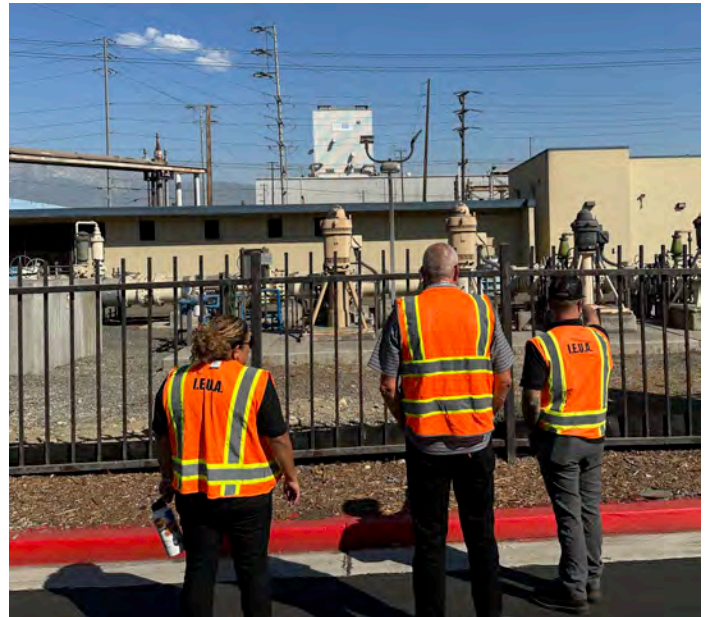
TASK A	Potential Violations and Areas of Concern	SSMP Elements
Fontana Interceptor Siphon)	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Element 1 (Att D-1) Spec. 5.7

6. Task B (Field Inspection - San Bernardino Lift Station)

This task included inspection of one of the Agency’s largest sewage pump stations in the system with operations management (see photos, B1-B4 below).



Task B (Photo B1): Inspection of San Bernardino Lift Station planned for complete capital upgrade in 2025-2026.



Task B (Photo B2): Inspection of San Bernardino Lift Station with management.



Task B (Photo B3): Lowest upstream manhole adjacent to station.



Task B (Photo B4): View looking south of former spill flow direction into adjacent drainage ditch southwest of the station.

A list of Best Practices (BPs) identified during Task B of the inspection is presented in Table 5 below.

Table 5 – Task B (Best practices identified during inspection)

TASK B	Best Practices (BPs)	SSMP Elements
(San Bernardino Lift Station)	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None

A list of Potential Violations (PVs) and Areas of Concern (AOC) identified during Task B of the inspection are presented in Table 6 below.

Table 6 – Task B (Potential Violations and Areas of Concern)

TASK B	Potential Violations and Areas of Concern	SSMP Elements
(San Bernardino Lift Station)	<ul style="list-style-type: none"> AOC: Lack of Standard Operating Procedures (SOPs) and emergency containment plan for station 	<ul style="list-style-type: none"> Element 1 (Att D-1) Spec. 5.7 Element 6 (Att. D-6)

7. Task C (Field Inspection – Regional Force Main Improvement Project)

This task included inspection of a construction project site as part of the Agency’s extensive Regional Force Main Improvement Project including installation of redundant manhole access points for the system (see photos, C1-C4 below).



Task C (Photo C1): Photo of one regional force main improvement project manhole location (one of several) to help provide additional access to force main.



Task B (Photo C2): View of Regional Force Main construction site looking north.



Task B (Photo C3): Inspection of Regional Force Main construction site manhole structure site (view 1).



Task B (Photo C4): Inspection of Regional Force Main construction site manhole structure site (view 2).

A list of Best Practices (BPs) identified during Task B of the inspection is presented in Table 5 below.

Table 7 – Task C (Best practices identified during inspection)

TASK C	Best Practices (BPs)	SSMP Elements
(Regional Force Main Improvement Project)	<ul style="list-style-type: none"> Extensive project to install dozens of redundant manhole access points along the force main conveyance system for improving inspection, cleaning, and emergency response operations of the system. 	<ul style="list-style-type: none"> Element 4 (Att D-4) Element 6 (Att. D-6) Element 8 (Att D-8)

A list of Potential Violations (PVs) and Areas of Concern (AOC) identified during Task C of the inspection are presented in Table 6 below.

Table 8 – Task C (Potential Violations and Areas of Concern)

TASK C	Potential Violations and Areas of Concern	SSMP Elements
(Regional Force Main Improvement Project)	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Non

8. Task D (Corp Yard Inspection + Audit Conference)

This task included interviews with the Agency’s Collection System management (see photos, D1-D12 below).



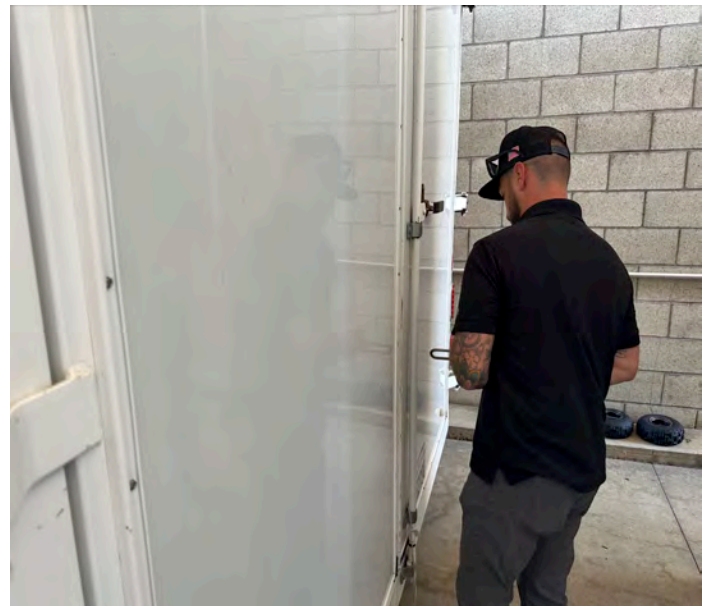
Task D (Photo D): Inspection of CCTV inspection vehicle/equipment.



Task A (Photo D2): Inspection of CCTV vehicle public outreach signage for Fats, Oils and Grease.



Task D (Photo D3): Inspection of CCTV vehicle public outreach signage for wipes.



Task A (Photo D4): Inspection of safety equipment trailer.



Task D (Photo D5): Inspection backup spare parts/equipment (view 1).



Task A (Photo D6): Inspection backup spare parts/equipment (view 2).



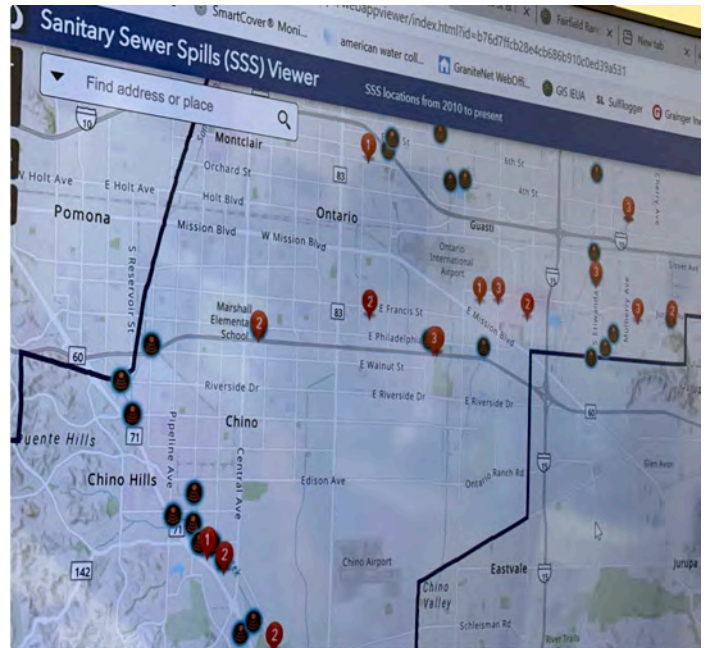
Task D (Photo D7): Inspection lay-flat hose trailer, generator, and other emergency spare equipment.



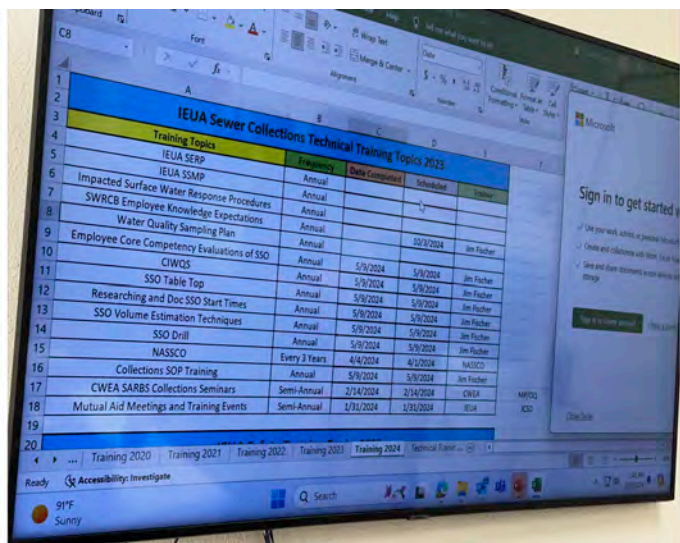
Task A (Photo D8): Inspection of combination vehicle public outreach signage (Fats, Oils, and Grease).



Task D (Photo D9): Pre-Inspection Conference with Agency management.



Task A (Photo D10): Inspection of extensive online spill data/records system; extensive records detailed in PowerPoint presentations and documents are archived for all sewage spills and readily available for review by compliance inspectors.



Task D (Photo D11): Inspection of extensive online training/records system; extensive records including detailed documentation for training topics, frequencies, dates completed, and upcoming scheduled training dates are tracked for all staff and readily available for review by compliance inspectors.



Task A (Photo D12): Inspection of Agency Condition Assessment Dashboard for the entire sewer system; including historic spill mapping graphics and other details are tracked and readily available for review by compliance inspectors.

A list of Best Practices (BPs) identified during Task D of the inspection is presented in Table 9 below.

Table 9 – Task D (Best practices identified during inspection)

TASK D	Best Practices (BPs)	SSMP Elements
(Corp Yard Inspection + Audit Conference)	<ul style="list-style-type: none"> BP D1: Extensive storm drain system maps available on separate GIS layers for Field Staff. 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Element 6 (Att. D-6)
	<ul style="list-style-type: none"> BP D2: Extensive CCTV program, data tracking and alternative technologies covering entire system; periodic inspections performed prior to cleaning to further assess/enhance cleaning strategies 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Element 8 (Att. D-8)
	<ul style="list-style-type: none"> BP D3: Extensive risk assessments completed for all pump stations. 	<ul style="list-style-type: none"> Element 8 (Att. D-8)
	<ul style="list-style-type: none"> BP D4: Enhanced Hot Spot Reduction Program in place 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Element 8 (Att. D-8)
	<ul style="list-style-type: none"> BP D5: Extensive annual training for all field staff and mutual assistance partners on Spill Emergency Response Plan/procedures to improve effectiveness and ensure staff competency 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Element 6 (Att. D-6)
	<ul style="list-style-type: none"> BP D6: Deployment of monitoring/level sensors in specific sewer locations to monitor areas with project delays until capital improvements are completed 	<ul style="list-style-type: none"> Element 8 (Att. D-8)

A list of Potential Violations (PVs) and Areas of Concern (AOC) identified during Task C of the inspection are presented in Table 10 below.

Table 10 – Task D (Potential Violations and Areas of Concern)

TASK D	Potential Violations and Areas of Concern	SSMP Elements
(Corp Yard Inspection + Audit Conference)	<ul style="list-style-type: none"> AOC D1: Staff competency assessments/field reviews/checks by Supervisors for all field staff covering spill volume estimations, accuracy of field data collection, and adherence to District standard operating procedures (SOPs) and safe practices 	<ul style="list-style-type: none"> Element 4 (Att. D-4)
	<ul style="list-style-type: none"> AOC D2: Improvements to existing manhole inspection program (resources, data collection/tracking) vs. only documenting known problems when discovered during cleaning/CCTV 	<ul style="list-style-type: none"> Element 8 (Att. D-8)
	<ul style="list-style-type: none"> AOC D3: Improvements for new procedure to ensure all mapping issues identified by operations staff are timely updated 	<ul style="list-style-type: none"> Element 4 (Att. D-4)
	<ul style="list-style-type: none"> AOC D4: Field staff operators suggested additional staffing resources could expand utilization of major sewer equipment sometimes not fully utilized and improve effectiveness of existing O/M work programs (cleaning, CCTV, etc.) and supporting funding/rate increases for further reducing spills 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Spec. 5.7 (Resources)
	<ul style="list-style-type: none"> AOC D5: Field operators noted budgeting issues have sometimes impacted necessary improvement projects including lining of siphons 	<ul style="list-style-type: none"> Element 8 (Att. D-8)
	<ul style="list-style-type: none"> AOC D6: Engineering/management commented on need for reducing workloads or adding additional staffing since due to current capital project completion rates of approximately 60% (rates normally hover 70-80% completion) 	<ul style="list-style-type: none"> Element 8 (Att. D-8)
	<ul style="list-style-type: none"> AOC D7: Improvements needed for ensuring systematic O/M program for all force main air release valves (ARVs) for early detection of problems/prevention of failures/spills 	<ul style="list-style-type: none"> Element 4 (Att. D-4) Spec. 5.19 (O/M)
	<ul style="list-style-type: none"> AOC D8: One spill report (CIWQS Spill #893627) for sludge discharge from WWTP sewage line was reported as a Category 2 spill (not required per Attachment E1 which should be clarified by the Santa Ana Regional Water Board. 	<ul style="list-style-type: none"> Att. E1

9.

10. Findings and Recommendations

To meet/exceed the requirements of the Reissued WDR, the Agency should address all findings areas of concerns identified in Table 11 below for completion of its next required SSMP Audit and updating its SSMP.

Table 11 – Inspection Findings and Recommendations

Potential Violations/Areas of Concern (AOC)	Findings/Recommendations for SSMP Update
<ul style="list-style-type: none"> AOC D1: Staff competency assessments/field reviews/checks by Supervisors for all field staff covering spill volume estimations, accuracy of field data collection, and adherence to District standard operating procedures (SOPs) and safe practices 	<ul style="list-style-type: none"> The inspection revealed the potential for further improving operator training/competency checks which should be implemented.
<ul style="list-style-type: none"> AOC D2: Improvements to existing manhole inspection program (resources, data collection/tracking) vs. only documenting known problems when discovered during cleaning/CCTV 	<ul style="list-style-type: none"> The inspection revealed the potential for further improving manhole field inspection efforts which should be implemented.
<ul style="list-style-type: none"> AOC D3: Improvements for new procedure to ensure all mapping issues identified by operations staff are timely updated 	<ul style="list-style-type: none"> The inspection revealed the potential for new procedures to ensure maps remain continuously updated which should be implemented.
<ul style="list-style-type: none"> AOC D4: Field staff operators suggested additional staffing resources could expand utilization of major sewer equipment sometimes not fully utilized and improve effectiveness of existing O/M work programs (cleaning, CCTV, etc.) and supporting funding/rate increases for further reducing spills 	<ul style="list-style-type: none"> The inspection revealed the potential for further expanding staffing which should be assessed and implemented if warranted for improving overall O/M effectiveness and maximizing spill reduction efforts.
<ul style="list-style-type: none"> AOC D5: Field operators noted budgeting issues sometimes impacted necessary improvement projects including lining of siphons 	<ul style="list-style-type: none"> The inspection revealed the potential for further assessing necessary identified capital improvements/funds to ensure critical infrastructure is timely repaired for maximizing spill reduction efforts.
<ul style="list-style-type: none"> AOC D6: Engineering/management commented on need for reducing workloads or adding additional staffing since due to current capital project completion rates of approximately 60% (rates normally hover 70-80% completion) 	<ul style="list-style-type: none"> The inspection revealed the potential for further assessing capital projects to ensure critical infrastructure is timely repaired.
<ul style="list-style-type: none"> AOC D7: Improvements needed for ensuring systematic O/M program for all force main air release valves (ARVs) for early detection of problems/prevention of failures/spills 	<ul style="list-style-type: none"> The inspection revealed the need for development of a formal ARV O/M program which should be timely developed and implemented to reduce spills.
<ul style="list-style-type: none"> AOC D8: Spill Reporting (CIWQS Spill #893627) 	<ul style="list-style-type: none"> The inspection revealed the spill may have erroneously been reported to CIWQS which should be clarified by the Regional Board.

11. Conclusions

The Agency should address all identified Areas of Concern (AOC) presented in Table 11 above including a plan/schedule for each inspection finding. Upon resolution of each finding, the Agency should update its SSMP change log and prepare supporting documentation for inclusion into its 2025 SSMP Update required by 5/2/2025.

Attachment A – Completed State Water Board Pre-Inspection Questionnaire

Table 4 below summarizes each element ranking, findings, and recommendations.

Element	Sufficiency Ranking	Findings	Recommendations
1. Goals	B	1. Did not meet the goal of less than one SSO per year average.	1. Develop a plan to help with early warning detection of SSOs.
		2. There are two goals here that can be cleaned up.	2. Reevaluate goals 1a and 1b; goals should be clear.
		3. Did not complete the CCTV inspections and capture in the GIS system.	3. CCTV inspections extended an additional year due to COVID-19 restrictions.
		4. "Track budget vs. actual expenditures" are not clear on how this is a goal related to mitigators.	4. Consider clarifying this goal to have more detail or specifics about what is to be captured.
		5. Conduct a condition assessment of both RSS and BSS systems. To identify what? For what purpose?	5. Consider adding additional information as to the purpose or importance.
		6. Communicate the causes and effects of SSOs with member agencies. How will this be communicated and tracked?	6. Consider adding how this is communicated. Is it during team meetings, through memos, etc.?
2. Organization	B	1. Difficult to keep track of organizational changes.	1. Should point to IEUA webpage for updates.
		2. Contact information needs to be updated.	2. Change contact information in the SSMP and monitor changes and updates.
3. Legal Authority	A	None	None
4. Operations and Maintenance Program	B	1. There are engineering and construction projects that need to be added.	1. Coordinate with Engineering to review and update new projects.
		2. IEUA Safety Training topics need to be updated with new topics for 2021.	2. Coordinate with Safety for new Safety Tailgate topics added for FY 2020-2021.
		3. Update IEUA Collection's equipment inventory list.	3. Reevaluate collections equipment inventory and update inventory list.
		4. SOPs are not in coordination with IEUA standards.	4. Need to utilize IEUA agency standards for SOPs.

		5. Manholes need to be capture at NASSCO level 2 standard.	5. Coordinate with the Collection and GIS staff to update the manhole inspection forms.
5. Design and Performance Provisions	A	None	None
6. Overflow Emergency Response Plan	B	1. WQMP has been completed by Environmental Compliance staff but has not been approved by Executive Management.	1. Follow up with Environmental Compliance staff to bring the document to Executive Management for approval.
7. FOG (fats, oils, grease) Control Program	A	1. Unless the Regional Contract is amended, IEUA should not take other cities' responsibilities.	1. There needs to be more communication with the member agencies regarding FOG and whether they have a FOG control program.
		2. There were grease issues at CCWRF and other places within the collections system. Recommend reevaluating if a grease program is necessary.	2. Source Control staff are handling all FOG-related issues.
8. System Evaluation and Capacity Assurance Plan	A	1. Condition assessment is old (2006). However, hydraulic analysis on Regional Sewer System (RSS) is current (2015). No capacity evaluation of Brine Sewer System (BSS).	1. Condition assessment project starting in 2021 to address 2006 assessment.
9. Monitoring, Measurement, and Program Modifications	A	1. Many improvements: reduced SSOs, higher production, enhanced training.	1. Collection staff have added 14 SmartCovers within the last audit period, with additional units forthcoming.
10. SSMP Program Audits	A	1. SSMP audits included staff outside of Collections and provided fresh perspectives.	1. Consider inviting outside agencies for the next audit.
11. Communication Program	B	1. Since IEUA's customers are limited to member agencies, communication to the general public seems limited.	1. Increase presence on the IEUA website. The website needs to be more user-friendly and easier to navigate to emergency numbers.

Table 4: Summarized Sufficiency Rankings, Findings, and Recommendations Per Element

The findings and recommendations from the 2021 audit report shown in Table 4 will be used to update the 2019 SSMP Revision. These items will be tracked in the SSMP Deficiency Log. This log will track the deficiency, person responsible, corrective action, and expected completion date.

Appendix 3 — Agency Spill Performance Benchmark Report

The purpose of this Appendix is to provide a spill performance benchmarking report for assisting the Agency with evaluating its existing spill reduction efforts which includes data visualization charts in comparison with other sanitary sewer collection systems within the region.

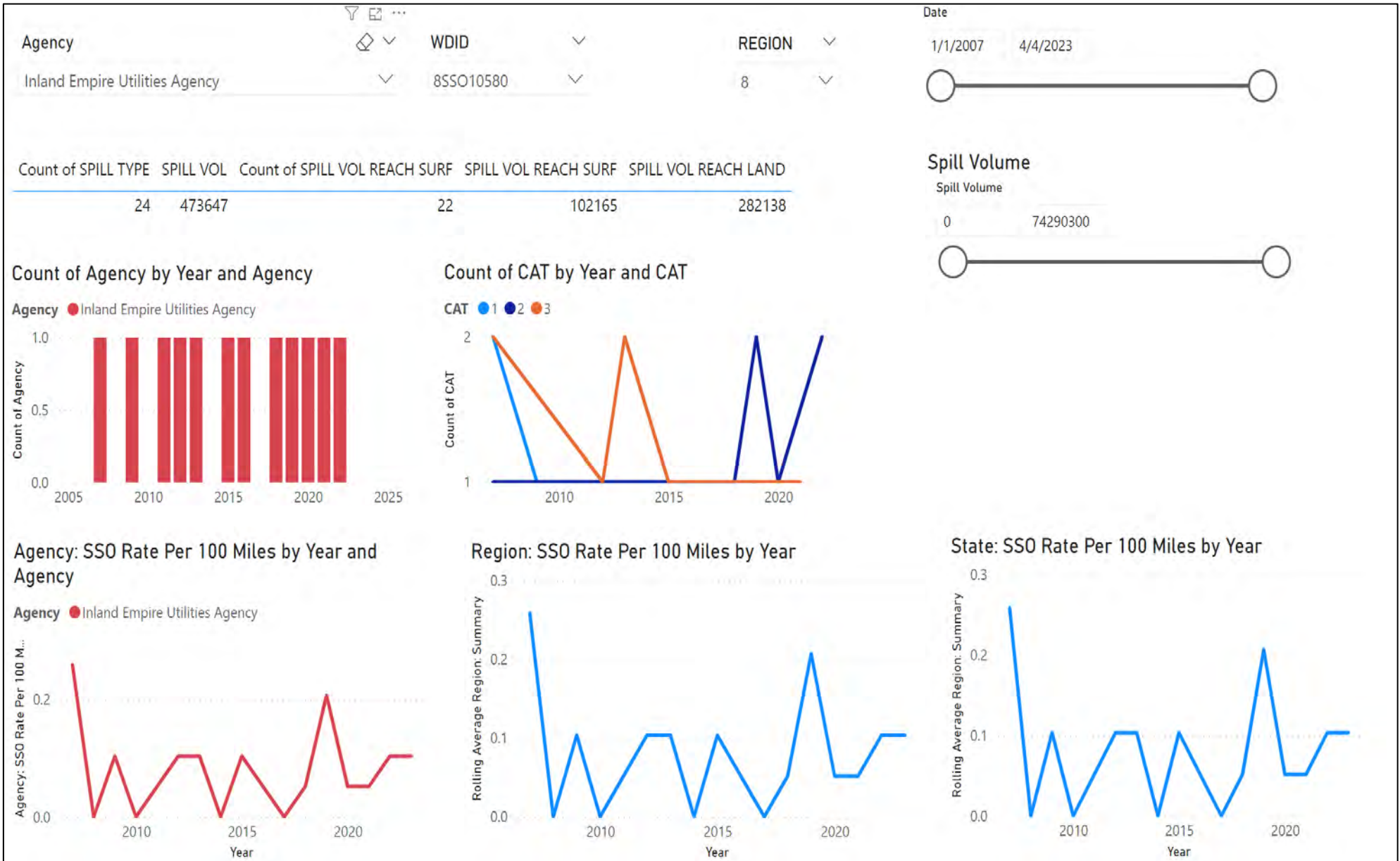


Figure 1 – Agency Spill Dashboard (2007-2023)

Observation: The Agency’s spill count and rolling average spill rates/volumes discharged per year have decreased significantly between 2007-2024.

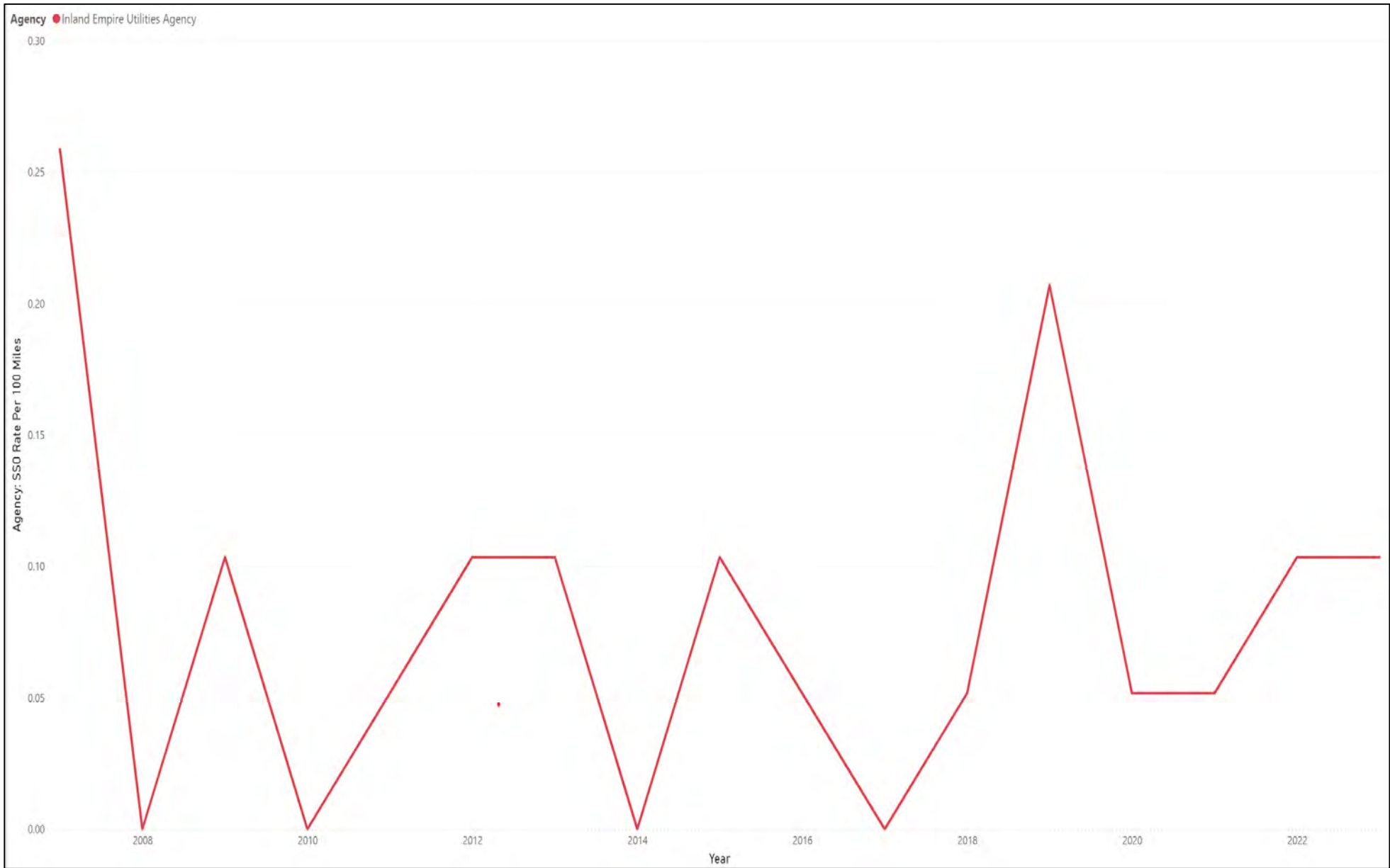


Figure 2 – Agency Spill Volume Trends, 2007-2024

Observation: The Agency's spill volume trend was significantly decreased in 2019 and rose in 2021.

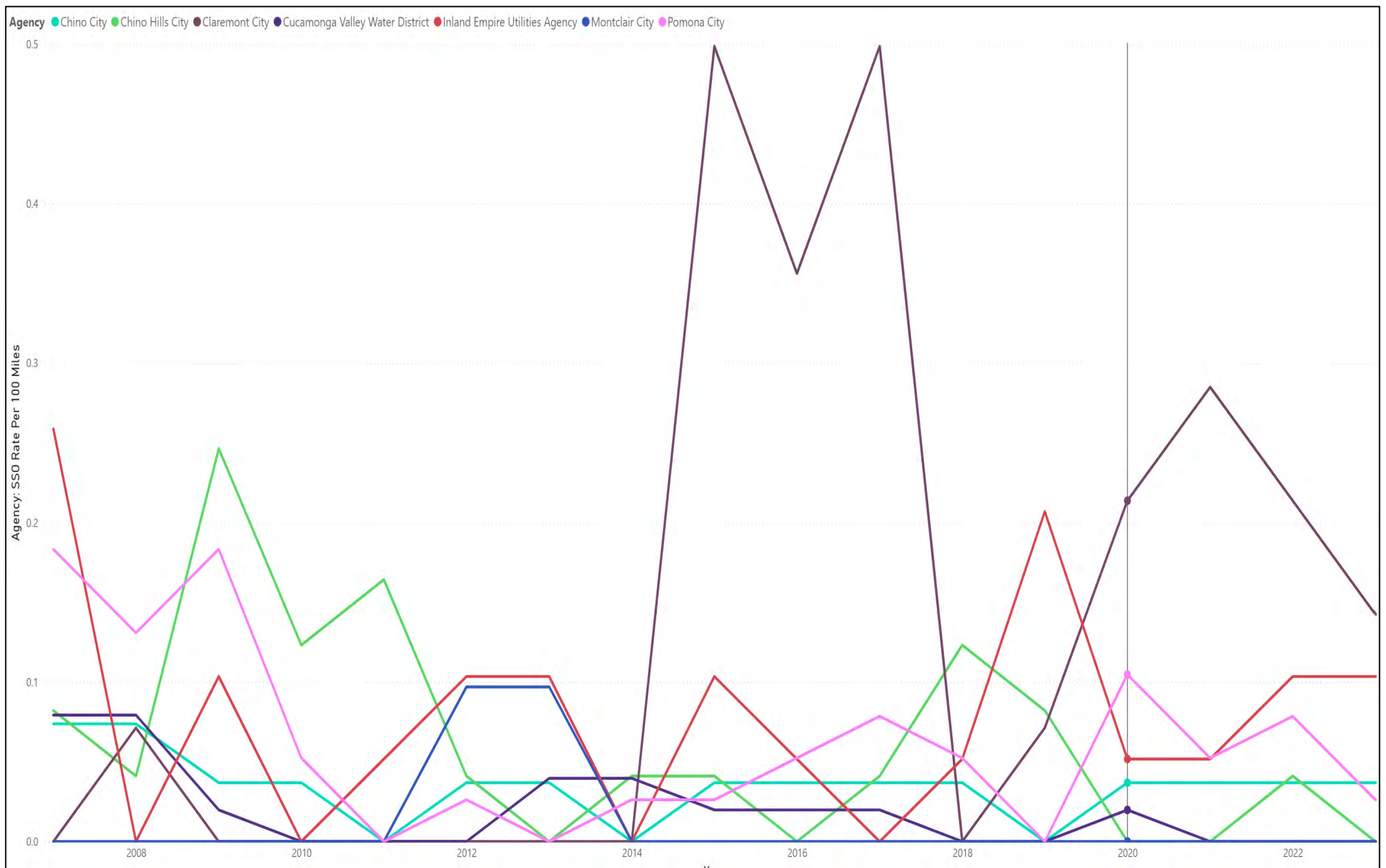


Figure 3 - Agency Spill Rolling Average (# of spills/100 miles of sewer) compared to other agencies

Observation: The Agency's rolling average spill rate (# of spills/100 miles) is significantly lower than other sewer agencies in the region.

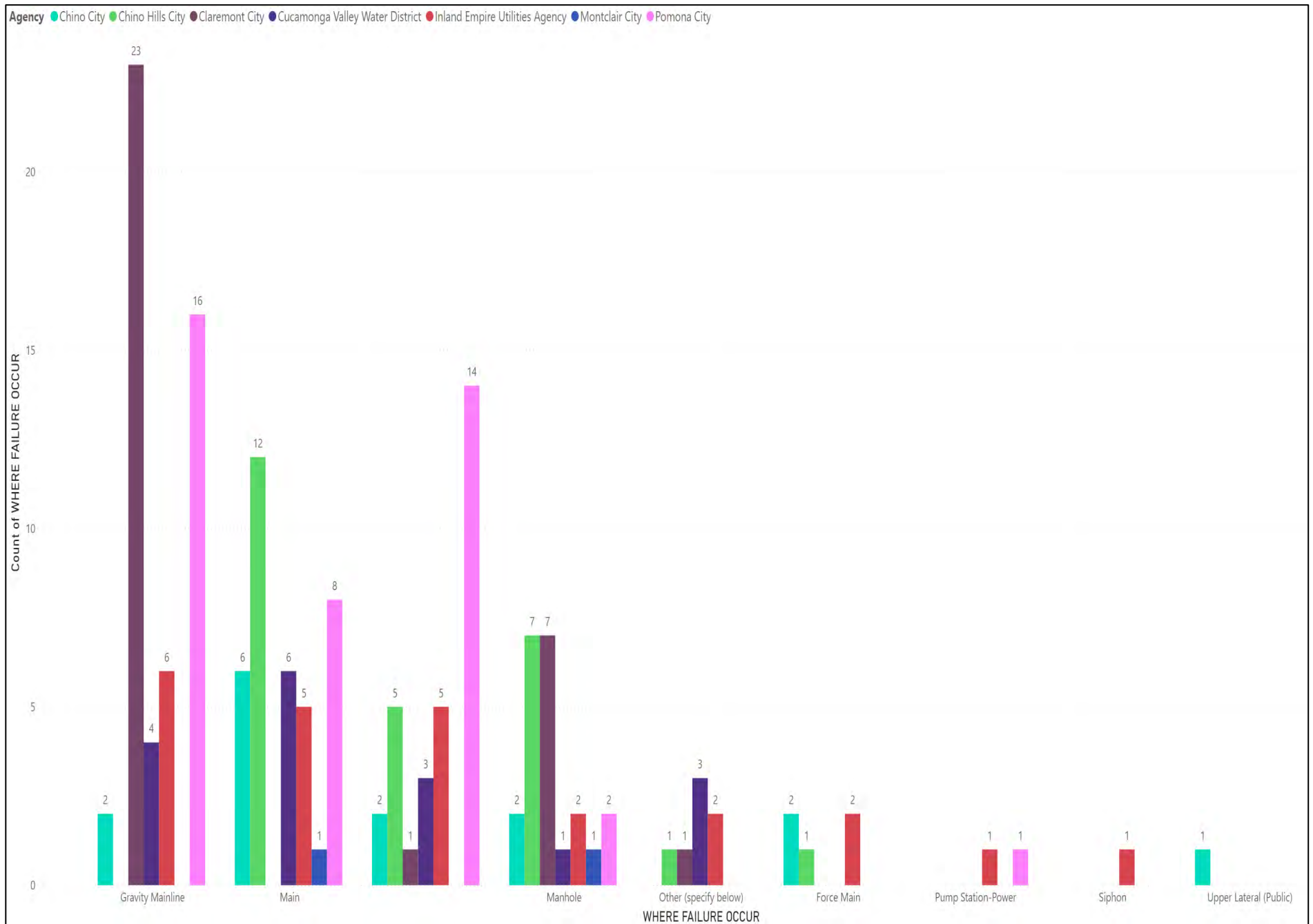


Figure 4 - Agency counts of where failures occurred compared to other agencies

Observation: The Agency's main spill causes from gravity mains and manholes are lower than other agencies in region.

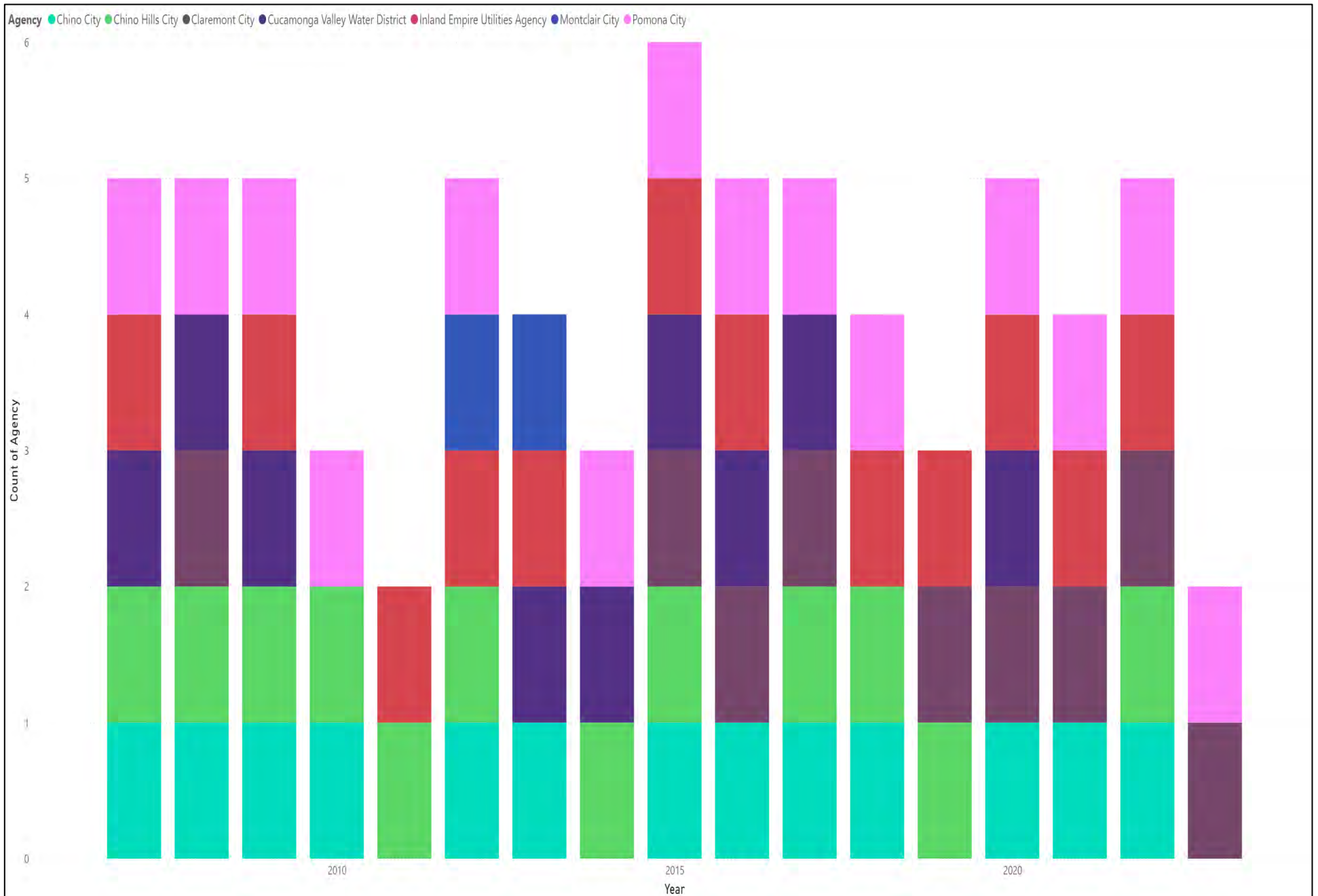


Figure 5 - Agency number of spills per year (2006-2024) compared to other agencies

Observation: None (see more detailed visualization for spill causes presented in Figure 6 below).

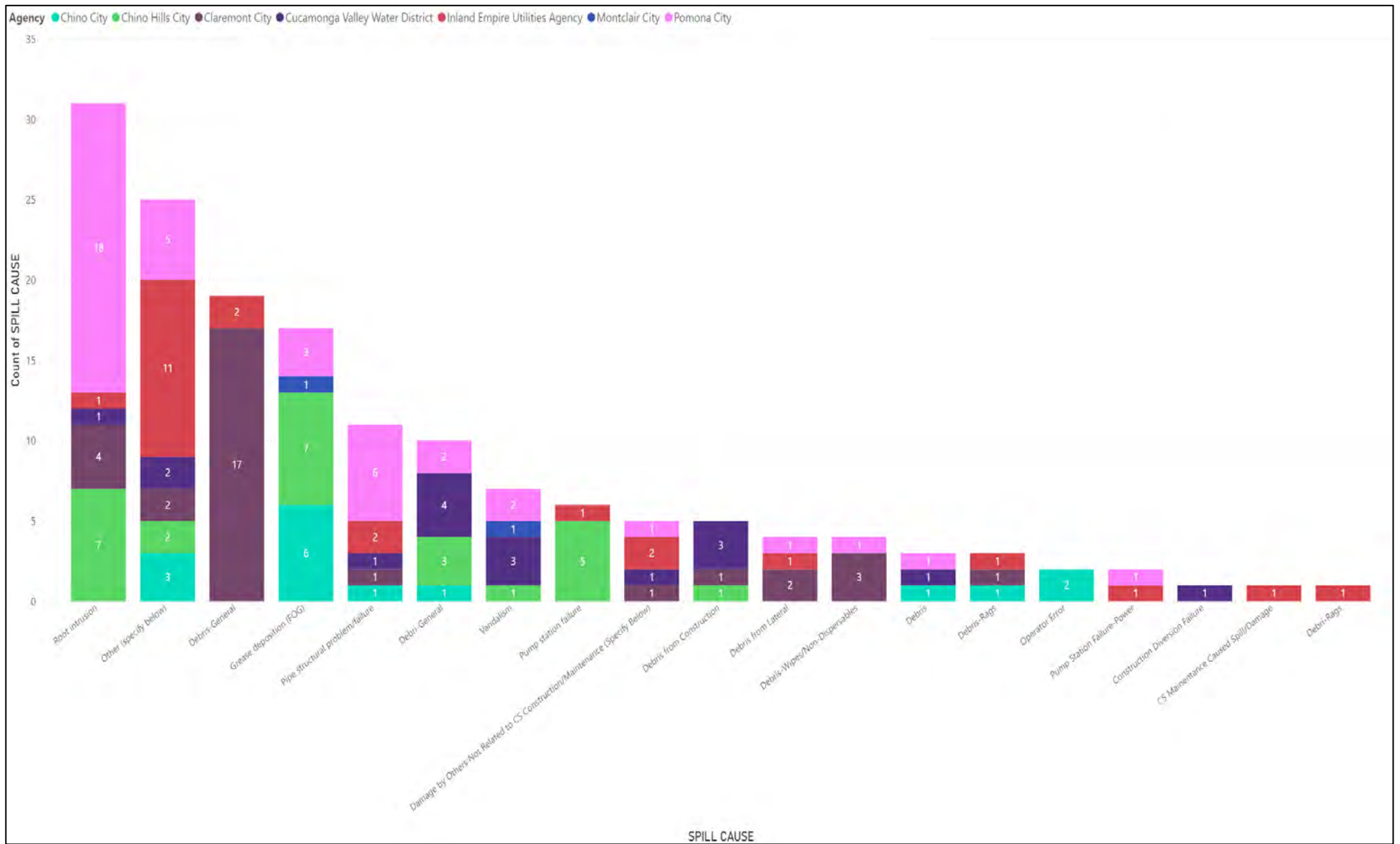


Figure 6 - Agency spill causes by # of spills compared to other agencies

Observation: The Agency's spill main causes are roots and grease, by numbers lower than many other sewer agencies in the region.

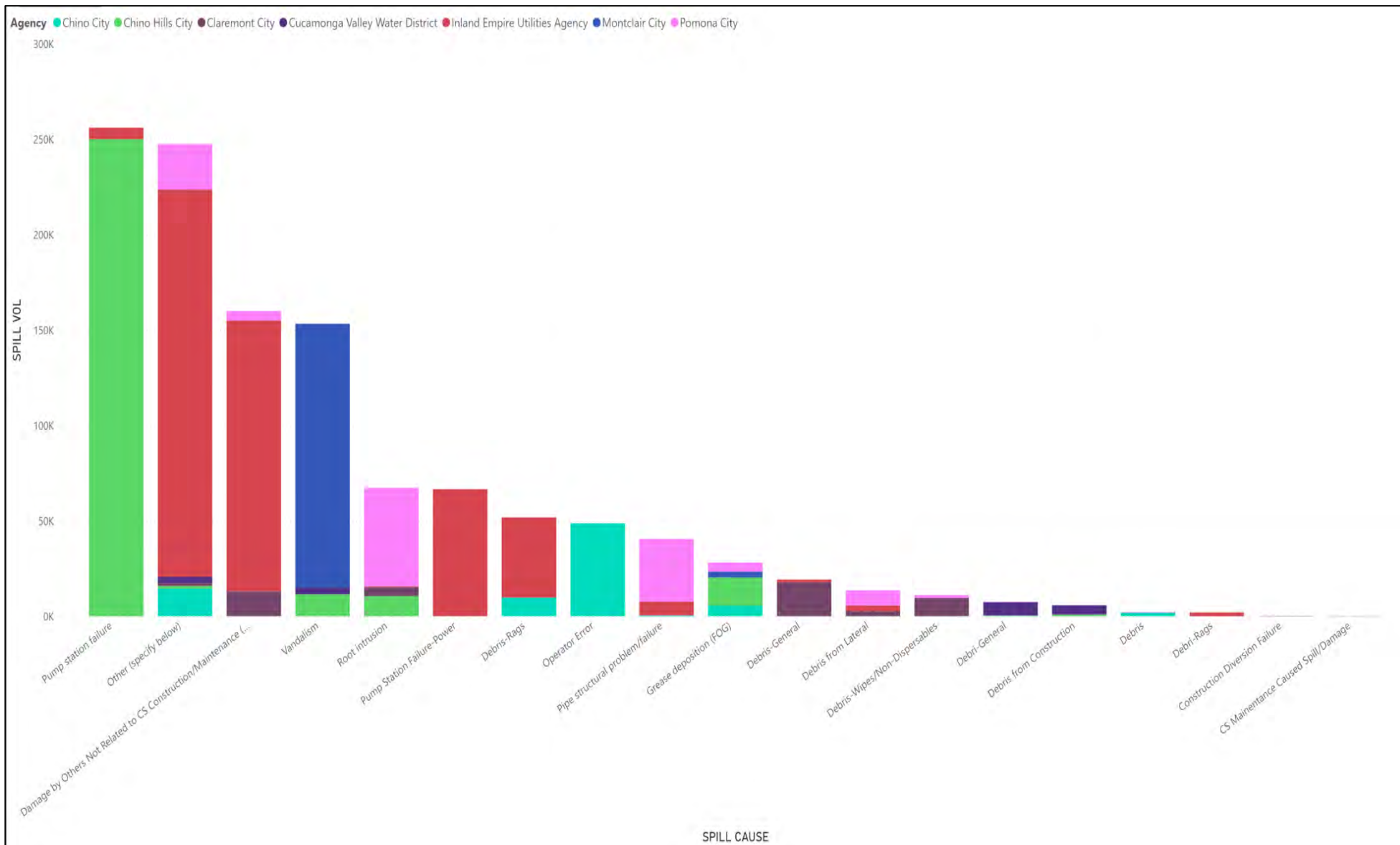


Figure 7 - Agency main spill causes by volume compared to other sewer agencies

Observation: The Agency's main spill causes by volume are from pump station failure, other causes, and from damage by others.

WDR ATTACHMENTS (IEUA PLAN/SCHEDULE, 2024-2027)

Requirements	Type (C-Conformance or R-Recommended)	IEUA Timeline	Date Completed	IEUA Notes (LRO)
Att. D-1	WDR - R	11/2/24 - 5/2/27		
Att. D-2	WDR - R	11/2/24 - 5/2/25		
Att. D-2	WDR - R	11/2/25 - 11/2/27		
Att. D-2	WDR - R	11/2/24 - 5/2/25		
Att. D-3	WDR - R	11/2/24 - 5/2/27		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - C	11/2/24 - 5/2/25		
Att. D-4	WDR - R	11/2/24 - 5/2/25		
Att. D-5	WDR - R	11/2/24 - 5/2/27		
Att. D-6	WDR - C	11/2/24 - 5/2/25		
Att. D-6	WDR - C	11/2/24 - 5/2/25		
Att. D-6	WDR - R	11/2/24 - 5/2/25		
Att. D-7	WDR - R	11/2/24 - 5/2/27		
Att. D-8	WDR - C	11/2/24 - 5/2/25		
Att. D-8	WDR - C	11/2/24 - 5/2/25		
Att. D-8	WDR - R	11/2/24 - 5/2/25		
Att. D-9	WDR - R	11/2/24 - 5/2/27		
Att. D-10	WDR - R	11/2/24 - 5/2/27		
Att. D-11	WDR - R	11/2/24 - 5/2/27		
Att. E1	WDR - C	11/2/24 - 5/2/25		
Att. E1	WDR - C	11/2/24 - 5/2/25		
Att. E1	WDR - R	11/2/24 - 5/2/25		

WDR SPECIFICATIONS (IEUA PLAN/SCHEDULE, 2024-2027)

Requirements	Type (C-Conformance or R-Recommended)	IEUA Timeline	Date Completed	IEUA Notes (LRO)
Spec. 5.1	WDR - R	11/2/24 - 5/2/27		
Spec. 5.1	WDR - R	11/2/24 - 5/2/25		
Spec. 5.2	WDR - C	11/2/24 - 5/2/25		
Spec. 5.2	WDR - R	11/2/24 - 5/2/25		
Spec. 5.3	WDR - R	11/2/24 - 5/2/25		
Spec. 5.3	WDR - R	11/2/24 - 5/2/25		
Spec. 5.4	WDR - R	11/2/24 - 5/2/25		
Spec. 5.4	WDR - R	11/2/24 - 5/2/25		
Spec. 5.6	WDR - R	11/2/24 - 5/2/25		
Spec. 5.6	WDR - R	11/2/24 - 5/2/25		
Spec. 5.10	WDR - C	11/2/24 - 5/2/25		
Spec. 5.10	WDR - R	11/2/24 - 5/2/25		
Spec. 5.11	WDR - R	11/2/24 - 5/2/27		
Spec. 5.11	WDR - R	11/2/24 - 5/2/25		
Spec. 5.12	WDR - C	11/2/24 - 5/2/25		
Spec. 5.12	WDR - R	11/2/24 - 5/2/25		
Spec. 5.13	WDR - C	11/2/24 - 5/2/25		
Spec. 5.13	WDR - R	11/2/24 - 5/2/27		
Spec. 5.14	WDR - R	11/2/24 - 5/2/27		
Spec. 5.14	WDR - R	11/2/24 - 5/2/25		
Spec. 5.15	WDR - R	11/2/24 - 5/2/25		
Spec. 5.19	WDR - C	11/2/24 - 5/2/25		

Previous IEUA 2021 SSMP Audit Findings

PREVIOUS IEUA SSMP AUDIT FINDINGS (2021)

Requirements	Type (C-Conformance or R-Recommended)	IEUA Timeline	Date Completed	IEUA Notes (LRO)
Att. D-4	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
Att. D-5	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
Att. D-6	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
Att. D-7	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		

PREVIOUS IEUA SSMP AUDIT FINDINGS (2021)

Requirements	Type (C-Conformance or R-Recommended)	IEUA Timeline	Date Completed	IEUA Notes (LRO)
Att. D-8	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
Att. D-9	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
Att. D-10	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
Att. D-11	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		
	WDR – R (see Appendix 2)	11/2/24 - 5/2/27		

Appendix 1 – Agency Additional Key Performance Indicators (KPIs)ag

This document provides a list of customized Key Performance Indicators (KPIs) for the Agency to facilitate for assessing effectiveness required for the upcoming SSMP Update and subsequent SSMP Audits.

Table of Contents

1. ELEMENT I (Goal and Introduction)	3
2. ELEMENT 2 (Organization)	4
3. ELEMENT 3 (Legal Authority)	5
4. ELEMENT 4 (Operations and Maintenance Program)	6
5. ELEMENT 5 (Design and Performance Provisions)	8
6. ELEMENT 6 (Spill Emergency Response Plan).....	9
7. ELEMENT 7 (Sewer Pipe Blockage Control Program).....	10
8. ELEMENT 8 (System Eval./Capacity/Capital Improvements).....	11
9. ELEMENT 9 (Monitoring, Measurement, Program Modifications).....	12
10. ELEMENT 10 (Internal Audits)	13
11. ELEMENT 11 (Communication Program).....	14
12. SPEC. 5.2 (Designation of LRO)	15
13. SPEC. 5.2 (Develop/Implement SSMP).....	16
14. SPEC. 5.6 (System Resilience).....	17
15. SPEC. 5.7 (Allocate Necessary Resources).....	18
16. SPEC. 5.13 (Comply with Attachment E1 Requirements).....	19

1. ELEMENT I (Goal and Introduction)

Attach. D-1 (SSMP Goal and Introduction)

SSMP Implementation

- | | | |
|--|--|---|
| <ul style="list-style-type: none">○ KPI D-1(a) | <ul style="list-style-type: none">○ Are the Agency's goals adequate in maintaining the sewer system, including O&M and spill reduction and response?○ Does the Agency have established response time goals for customer service response? | <p><u>Action:</u></p> <ul style="list-style-type: none">○ Annual review |
|--|--|---|

SSMP Effectiveness

- | | | |
|---|---|---|
| <ul style="list-style-type: none">○ KPI D-1(b)○ KPI D-1(c) | <ul style="list-style-type: none">○ Are the Agency's Preventative Maintenance work plans being Implemented?○ Are Agency spill Reduction Goals being met?○ What is the Agency's average response time for response?○ Total number of spills prevented (plugged mains that were discovered while doing routine PM) | <p><u>Element Review Frequency/Tasks:</u></p> <ul style="list-style-type: none">○ Annual review○ Annual review○ Annual review○ Annual review |
| <ul style="list-style-type: none">○ KPI D-1(e) | <ul style="list-style-type: none">○ Are Agency spill event responses effective? | <p><u>Element Review Frequency/Tasks:</u></p> <ul style="list-style-type: none">○ Annual review |
| <ul style="list-style-type: none">○ KPI D-1(f) | <ul style="list-style-type: none">○ Annual review/update of Agency goals and narrative descriptions | <p><u>Element Review Frequency/Tasks:</u></p> <ul style="list-style-type: none">○ Annual review |
| <ul style="list-style-type: none">○ KPI D-1(g) | <ul style="list-style-type: none">○ Annual review/update of system performance (wet weather spill/surcharge events). | <p><u>Element Review Frequency/Tasks:</u></p> <ul style="list-style-type: none">○ Annual review |
| <ul style="list-style-type: none">○ KPI D-1(h) | <ul style="list-style-type: none">○ Does the Agency update its sewer system asset inventory annually? | <ul style="list-style-type: none">○ Annual review |

SSMP Resilience

- | | | |
|--|--|--|
| <ul style="list-style-type: none">○ KPI D-1(h) | <ul style="list-style-type: none">○ None | <ul style="list-style-type: none">○ None |
|--|--|--|

2. ELEMENT 2 (Organization)

Attach. D-2 (Organization)

SSMP Implementation

- KPI D-2(a) ○ Are the Agency's organizational procedures adequate for ensuring full SSMP compliance?

Element Review Frequency/Tasks:

- Annual review

SSMP Effectiveness

- KPI D-2(b) ○ Does the Agency SSMP adequately describe SSMP Responsibilities/Tasks for all staffing?
- KPI D-2(c) ○ Is Agency Chain of Communication effective and updated?

Element Review Frequency/Tasks:

- Annual review

- Annual review

SSMP Resilience

- KPI D-2(d) ○ None

- None

3. ELEMENT 3 (Legal Authority)

Attach. D-3 (Legal Authority)

SSMP Implementation

- KPI D-3(a)
- Does the Agency implement its existing codes and ordinances?

Element Review Frequency/Tasks:

- Periodic review of sewer use ordinance implementation to ensure adequate required legal authority

SSMP Effectiveness

- KPI D-3(a)
- Are the Agency codes and ordinances adequate for fulfilling the SSMP legal requirements?

Element Review Frequency/Tasks:

- Annual review/update of review of completed work orders and customer complaints to ensure adequacy of authority
- Annual review/update of any encounters by staff for circumstances where sewer use ordinance was inadequate

SSMP Resilience

- KPI D-3(d)
- None

- None

4. ELEMENT 4 (Operations and Maintenance Program)

Attach. D-4 (Operations and Maintenance)

SSMP Implementation

- KPI D-4(a)
 - Are the Agency's organizational procedures adequate for ensuring full SSMP compliance?
 - Are Agency preventative maintenance programs implemented and effective?
 - Is Agency tracking metrics for miles of pipe cleaned, CCTV-inspected, and pump station inspections performed in system?

Element Review Frequency/Tasks:

- Annual review/update of Agency organizational staffing, contacts, and responsibilities
- Annual review of O/M program
- Annual review of program metrics

SSMP Effectiveness

- KPI D-4(b)
 - Are Agency maps up to date?
- KPI D-4(c)
 - % of new assets added to Agency's sewer mapping system
- KPI D-4(d)
 - Does Capital Improvement Plan (CIP) properly address Agency needs?
 - Annual Agency Capital budget for rehabilitation or replacement?
- KPI D-4(e)
 - Are Agency complete maintenance, operations, engineering work orders reviewed for accuracy and completeness?
 - Number of annual PM work orders completed?
- KPI D-4(f)
 - Is Agency Rehabilitation and Replacement (R/R) plan being implemented?
- KPI D-4(g)
 - % of Agency's CCTV goal completed
 - Number of annual CCTV work orders completed?
- KPI D-4(h)
 - Is Agency critical spare parts adequate and up-to-date.

Element Review Frequency/Tasks:

- Annual review/update to ensure all system maps are up to date per change requests submitted by field staff

Element Review Frequency/Tasks:

- Annual review/update of requirements to ensure compliance conformance.
- Annual review/update of current maps to ensure new construction project assets have been added.

Element Review Frequency/Tasks:

- Is each segment evaluated for capacity deficiencies based on projected growth
- Are system assets evaluated for remaining useful life
- Is existing CIP plan and schedule being implemented as intended?

Element Review Frequency/Tasks:

- Annual review

Element Review Frequency/Tasks:

- Annual review/update of R/R plan to ensure adherence to plan and schedule

Element Review Frequency/Tasks:

-

Element Review Frequency/Tasks:

- Bi-annual review

% if required critical spare parts in stock?

Bi-annual review

KPI D-4(i)

Has all required Agency staff training been completed?

Element Review Frequency/Tasks:

Bi-annual review

% of required training completed for wastewater collection staff

Bi-annual review

SSMP Resilience

KPI D-2(jl)

None

None

5. ELEMENT 5 (Design and Performance Provisions)

Attach. D-5 (Design and Performance Provisions)

SSMP Implementation

- KPI D-5(a)
- Does the Agency implement its current design and construction standards, specifications, and inspection procedures?

Element Review Frequency/Tasks:

- Annual review

SSMP Effectiveness

- KPI D-5(b)
- Are existing Agency design and construction standards, specifications, and inspection procedures adequate for the collection system?
- Annual review of the Agency's standards and procedures for acceptance and testing of new infrastructure?
- % of new infrastructure accepted vs inspected

Element Review Frequency/Tasks:

- Annual review
- Annual review
- Annual review

SSMP Resilience

- KPI D-5(c)
- None

- None

6. ELEMENT 6 (Spill Emergency Response Plan)

Attach. D-6 (Spill Emergency Response Plan)

SSMP Implementation

- KPI D-6(a) ○ Develop and implement a Spill Emergency Response Plan

Element Review Frequency/Tasks:

- Quarterly review and training on SERP
- Quarterly training/drills on SERP including practice drills with completing field data collection form

SSMP Effectiveness

- KPI D-6(b) ○ Were Agency notification procedures outlined in the SERP adhered to for each spill event?

Element Review Frequency/Tasks:

- Annual review

- KPI D-6(c) ○ Procedures reviewed to provide prompt notification to appropriate Agency parties for a spill event?

Element Review Frequency/Tasks:

- Annual review

- KPI D-6(d) ○ Was Agency SERP training performed as prescribed in SSMP?
 - % of employees that completed annual training on SERP versus total field staff

Element Review Frequency/Tasks:

Element Review Frequency/Tasks:

- Annual review of completed checklists for all Category 1 spills >1,000 gallons reaching surface waters

- KPI D-6(e)

- Did the Agency complete a Category 1 spill assessment checklist for all large spills?

SSMP Resilience

- KPI D-6(f) ○
 - Coordinate meetings to improve mapping and Spill response activities with Kern County
 - % of Bi-annual meetings with Kern County completed

- None

7. ELEMENT 7 (Sewer Pipe Blockage Control Program)

Attach. D-7 (Sewer Pipe Blockage Control Program)

SSMP Implementation

- | | | |
|----------------------------------|--|--|
| <input type="radio"/> KPI D-7(a) | <input type="radio"/> Is Agency commercial FOG program being implemented and are goals being achieved? | <u>Element Review Frequency/Tasks:</u>
<input type="radio"/> Annual review of goals |
|----------------------------------|--|--|

SSMP Effectiveness

- | | | |
|----------------------------------|--|-------------------------------------|
| <input type="radio"/> KPI D-7(b) | <input type="radio"/> Is Agency residential FOG and root programs being administered and are goals being achieved? | <input type="radio"/> Annual review |
| | <input type="radio"/> Number of spills caused by hot spots or FOG | <input type="radio"/> Annual review |
| | <input type="radio"/> % of spills caused by FOG | <input type="radio"/> Annual review |
| | <input type="radio"/> % of spills caused by Roots | <input type="radio"/> Annual review |
| | <input type="radio"/> % of spills caused by debris/rags (non-dispersibles) | <input type="radio"/> Annual review |
| | <input type="radio"/> % of hot spots inspected annually | <input type="radio"/> |
| | <input type="radio"/> % of hot spots inspected annually | <input type="radio"/> Annual review |
| | <input type="radio"/> Number of hot spots removed from Hot Spot list annually? | <input type="radio"/> Annual review |

SSMP Resilience

- | | | |
|----------------------------------|----------------------------|----------------------------|
| <input type="radio"/> KPI D-7(e) | <input type="radio"/> None | <input type="radio"/> None |
|----------------------------------|----------------------------|----------------------------|

8. ELEMENT 8 (System Eval./Capacity/Capital Improvements)

Attach. D-7 (Sewer Pipe Blockage Control Program)

SSMP Implementation

- KPI D-8(a) ○ Has the Agency been adhered to its system evaluation/condition assessment efforts?

Element Review Frequency/Tasks:

- Annual review/update of system inspections/evaluations

SSMP Effectiveness

- % of sewer system condition assessment completed annually
- # of flowmeters installed to evaluate system capacity

- KPI D-8(b) ○ Has the Agency experienced any capacity-related spills or surcharge events?
- KPI D-8(c) ○ Have any changes occurred within the Agency service area that might affect the hydraulic model?
- KPI D-8(d) ○ Has CIP capacity-related projects/schedule been adhered to?
- KPI D-8(e) ○ Has the prioritization/corrective actions for sewer repairs been adhered to?
- KPI D-8(f) ○ Has the capital improvement plan been adhered to?

Element Review Frequency

- Annual review
- Annual review
- Annual review
- Annual review
- Annual review

SSMP Resilience

- KPI D-8(g) ○ Improve capacity-related investigations and inspections

Element Review Frequency/Tasks:

- Periodic review of flow/level sensor data (wet weather months)
- Periodic review of goals and KPIs (wet weather months)

9. ELEMENT 9 (Monitoring, Measurement, Program Modifications)

Att. D-9 (Monitoring, Measurement, Program Modifications)

SSMP Implementation

- KPI D-9(a)
- Were Agency KPIs reviewed and evaluated for each element of the SSMP efforts?

Element Review Frequency/Tasks:

- Annual review

SSMP Effectiveness

- KPI D-9(b)
- Were annual Agency maintenance/repair activities including Performance Measures evaluated/updated?

- KPI D-9(c)
- Were any Agency SSMP program compliance point(s) corrected and/or updated based on results of performance measures?
 - Spills per 100 miles of pipe
 - Volume of spills per 100 miles of pipe
 - Number of Category 1 spills
 - Number of spills caused by lift station failure
 - Number of repeat spills from same location

Element Review Frequency/Tasks:

- Annual review

Element Review Frequency/Tasks:

- Annual review

SSMP Resilience

- KPI D-9(d)
- None

- None

10. ELEMENT 10 (Internal Audits)

Att. D-10 (SSMP Internal Audits)

SSMP Implementation

- KPI D-10(a) ○ Were SSMP internal program audits completed?

Element Review Frequency/Tasks:

- Review of Audit reports

SSMP Effectiveness

- KPI D-10(b) ○ Did the SSMP internal audit evaluate the SSMP for compliance?
- KPI D-10(b) ○ Did the SSMP internal audit evaluate the SSMP for effectiveness?
- KPI D-10(c) ○ Were all past SSMP internal audit findings and schedule met for incorporating new changes into SSMP?

- KPI D-10(d) ○ Were any upgrades made to enhance SSMP work programs?

Element Review Frequency/Tasks:

- Review of completed SSMP internal audits

Element Review Frequency/Tasks:

- Review of completed SSMP internal audits

Element Review Frequency/Tasks:

- Review of past SSMP internal audit commitments and priorities, including any outstanding items not captured in SSMP/change log to be flagged for carry-over for next SSMP update

Element Review Frequency/Tasks:

- Review of SSMP/change log

SSMP Resilience

- KPI D-10(e) ○ None

- None

11. ELEMENT 11 (Communication Program)

Att. D-11 (Communication Program)

SSMP Implementation

- KPI D-10(a)
- Was the public afforded the opportunity to provide input as the program is being implemented?

Element Review Frequency/Tasks:

- Periodic review to ensure board has approved latest SSMP.
- Periodic review to verify latest SSMP/docs are posted on website.
- Periodic review of any public comments received via website or direct contact with Agency staff annual review/update of KPIs

SSMP Effectiveness

- KPI D-10(b)
- Were all outside agency/communications documented?
- Number of annual public outreach events
- Number of Regional Partner meetings
- % of customers receiving public outreach information

Element Review Frequency/Tasks:

- Element Review Frequency periodic review of outside agency/satellite meetings/emails/notices of communications.

SSMP Resilience

- KPI D-10(c)
- External communications verifications

Element Review Frequency/Tasks:

- Annual review/update to ensure the general public has access to the Agency SSMP via website with a mechanism to provide input/comments

12. SPEC. 5.2 (Designation of LRO)

Spec. 5.1 (Designation of Legally Responsible Official)

SSMP Implementation

- KPI 5.1(a) ○ Does the Agency LRO and supporting staff possess adequate knowledgeable, training, skills, and abilities for implementing all Reissued WDR requirements?

Element Review Frequency/Tasks:

- Annual review/update of staff competency checks/tests

SSMP Effectiveness

- KPI 5.1(b) ○ Are Agency LRO policies in place adequate, including authorization for making managerial decisions governing operation of the sanitary sewer system, including having the explicit or implicit duty of making major capital improvement recommendations to ensure long-term environmental compliance?
- KPI 5.1(c) ○ Has the Agency complied with all the ongoing WDR deadlines?
- KPI 5.1(d) ○ Has the Agency complied with the change notification requirements for its LROs?
- KPI 5.1(e) ○ Compliance with SWRCB pre-inspection questionnaire
- KPI 5.1(f) ○ Compliance with internal SSMP Audit findings and recommendations

Element Review Frequency/Tasks:

- Annual review/update of any issues arisen attributable to inadequate LRO oversight, training/competency
- Annual review/update of KPI frequency and success rate/adjust as necessary
- Annual review/update of Agency compliance performance with spill notification, monitoring, reporting, recordkeeping
- Review of any change(s) in LRO designation(s) and meeting compliance deadlines specified in Attachment E1
- Annual review/update of questionnaire, document changes to work programs/accomplishments
- Annual review/update of past SSMP Audit findings and recommendations for improving compliance, implementation, and spill reduction performance

13. SPEC. 5.2 (Develop/Implement SSMP)

Spec. 5.2 (Development and Implementation of SSMP)

SSMP Implementation

- KPI 5.2(a) ○ Are the Agency's existing work programs effective in reducing spills to meet SSMP goals and objectives?

Element Review Frequency/Tasks:

- Annual review/update of exiting work programs to ensure conformance with SSMP goals and objectives

SSMP Effectiveness

- KPI 5.2(b) ○ Does the Agency implement standard operator procedures (SOPs) to measure and support improving SSMP effectiveness?

Element Review Frequency/Tasks:

- Annual review/update of Agency SOPs

- KPI 5.2(c) ○ Does the Agency implement standard operator procedures (SOPs) to measure and support improving SSMP effectiveness?

Element Review Frequency/Tasks:

- Annual review/update of all related SSMP procedures and work programs

- KPI 5.2(d) ○ Does the Agency's existing data collection and work order system adequately allow analysis of potential impacts that could cause spills?

Element Review Frequency/Tasks:

- Annual review/update data collection methods and work orders and documentation of accomplishments, including instances where spills were eliminated

- KPI 5.2(e) ○ Do the Agency work programs include procedures for spill containment/recovery, sewer mapping, work order system/tracking, emergency responses, and operator training?

Element Review Frequency/Tasks:

- Annual review/update of Agency work programs

- KPI 5.2(f) ○ Does the Agency meet its proposed objectives with improving its SSMP ranking >80% by October 2024?

Element Review Frequency/Tasks:

- Annual review/update and assessment/ranking of all SSMP requirements

SSMP Resilience

- KPI 5.2(g) ○ Collection system certification (CWEA)

Element Review Frequency/Tasks:

- Annual survey of line staff resources

14. SPEC. 5.6 (System Resilience)

Spec. 5.6 (Sewer System Resilience)

SSMP Implementation

- KPI 5.6(a) ○ Are the Agency's existing efforts in identifying possible spill vulnerabilities effective?

Element Review Frequency/Tasks:

- Annual review/update/update of historic spill causes and vulnerabilities

SSMP Effectiveness

- KPI 5.6(b) ○ Does the Agency proactively prioritize its operation and maintenance, condition assessments, and repair, and rehabilitation efforts to help further reduce vulnerabilities for spills??

Element Review Frequency/Tasks:

- Annual review/update of Agency CCTV records and data

- KPI 5.6(c) ○ Does the Agency assess/review its ongoing historic spills, causes, and vulnerabilities?

Element Review Frequency/Tasks:

- Annual review/update/update of historic spill causes and vulnerabilities; adjust resilience matrix as necessary

- KPI 5.6(e) ○ Does the Agency implement a program to address existing "Hot Spots" to help further reduce vulnerabilities for spills?

Element Review Frequency/Tasks:

- Annual review/update/update of "hot spot" implementation plan/schedule conformance

- KPI 5.6(f) ○ Does the Agency have a "Hot Spot" reduction program to help further reduce vulnerabilities for spills??

Element Review Frequency/Tasks:

- Annual review/update of specific "hot spot" resources (time/labor/materials) spent on cleaning all locations and list of locations repaired, resolved, and eliminated

SSMP Resilience

- KPI 5.6(h) ○ Collection system electronic monitoring
- Collection system resilience

Element Review Frequency/Tasks:

- Evaluation for installation of flow/level sensors in system areas necessary for further reducing risks for future spills and improve monitoring
- Development of Agency "resilience indicators" for measuring how well the collection system can withstand and recovery quickly from real-world stresses, setbacks and /or difficulties including major infrastructure failures

15. SPEC. 5.7 (Allocate Necessary Resources)

Spec. 5.7 (Allocate Necessary Resources)

SSMP Implementation

- KPI 5.7(a)
- Are the Agency's existing resources adequate?

Element Review Frequency/Tasks:

- Annual review/update of resource allocations and budgets specific to sewer collection system operations, maintenance, and capital improvements

SSMP Effectiveness

- KPI 5.7(b)
- Does the Agency maintain adequate means to manage revenues and expenditures for supporting the sewer collection system?

Element Review Frequency/Tasks:

- Annual review/update of Agency budget allocations/funds spent on sewer system
- Long-range review (5-10 years) of Agency financial planning for ensuring adequate budgets/allocations for sewer system operations/maintenance and capital projects

- KPI 5.7(c)
- Does the Agency maintain adequate sewer fees for supporting its the sewer system requirements?

Element Review Frequency/Tasks:

- Annual review/update of Agency sewer fees

SSMP Resilience

- KPI 5.7(d)
- None

- None

16. SPEC. 5.13 (Comply with Attachment E1 Requirements)

Spec. 5.13 (Compliance with Attachment E1 Requirements)

SSMP Implementation

KPI 5.13(a)	Are the Agency's data collection efforts (field forms, work order system) adequate for supporting all required information required by Attachment E1?	Element Review Frequency/Tasks: Annual review/update of Agency data collection and reporting efforts against Attachment E1 requirements
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SSMP Effectiveness

KPI 5.13(a)	Do Agency field data collection efforts comply with Attachment E1?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Agency field data collection forms against requirements
KPI 5.13(c)	Are required spill notification timeframes for Category 1 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 1 spills against requirements for notifying Cal-OES within 2 hours
KPI 5.13(d)	Are required spill notification timeframes for Category 2 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 2 spills against requirements for notifying Cal-OES
KPI 5.13(e)	Are required spill reporting timeframes for Category 3 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 1 spills vs. requirements
KPI 5.13(f)	Are required spill reporting timeframes for Category 4 spills being met?	Element Review Frequency/Tasks: Element Review Frequency annual review/update of all Category 1 spills vs. requirements
KPI 5.13(g)	Are the Agency field staff competent with operations, maintenance, repair, and spill response procedures?	Element Review Frequency/Tasks: Assessments (every 3 years) for all Agency field staff

SSMP Resilience

KPI 5.13(h)	Quarterly training on Agency field data collection form and required procedures	Element Review Frequency/Tasks: Quarterly training to ensure consistency with staff data collection and improving procedures as necessary
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California Integrated Water Quality System Project (CIWQS)

Spill Public Report – Spill Event ID(s) Page

Here is the detail page of your Sanitary Sewer System Spill Report search for selected Regional Board, county, responsible agency, or sanitary sewer system. These results correspond to the following search criteria:

SEARCH CRITERIA: [\[REFINE SEARCH\]](#)

- Agency (Inland Empire Utilities Agency)
- Spill Type (Category 1; Category 2; Category 3)
- Agency (Inland Empire Utilities Agency)
- Agency (Inland Empire Utilities Agency)
- Agency (Inland Empire Utilities Agency)
- Agency (Inland Empire Utilities Agency)
- Agency (Inland Empire Utilities Agency)

The table below presents important details from Enrollee-submitted certified spill events, as submitted through individual spill reports, which meet the search criteria selected on the Sanitary Sewer System (SSS) Spill Report Form. If data is not shown for a particular field, it means the Enrollee did not provide the information and was not required to do so. To view the entire spill report, select the corresponding "Spill Event ID".

DRILLDOWN HISTORY: [\[GO BACK TO SUMMARY PAGE\]](#)

REGION: 8

[\[VIEW PRINTER FRIENDLY VERSION\]](#) [\[EXPORT THIS REPORT TO EXCEL\]](#)

Event ID	Region	Responsible Agency	Sewer System	WDID	Spill Category	Spill Start Date	Spill Vol (gal)	Spill Vol Recovered (gal)	Spill Vol Reached Surface Water (gal)	System Failure Location	Spill Appearance Point
893632	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2 Spill	2024-02-22 06:55	4,114	4,114		Force Main	Force Main,Other (specify below)
893627	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2 Spill	2024-02-21 00:00	71,550	70,119		Force Main	Force Main,Other (specify below)
891622	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Monthly Category 3 Spill	2023-11-07 00:53	546	546		Pump Station - Mechanical	Pump Station
882468	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2022-07-06 13:26	2,500	2,500	0	Gravity Mainline	Gravity Mainline
882403	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2022-07-19 14:15	7,140	7,140	0	Force Main	Force Main
877575	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2021-10-23 18:00	85	85	0	Gravity Mainline	Gravity Mainline
868033	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2020-07-19 08:12	42,000	41,000	0	Siphon	Gravity Mainline;Manhole
863207	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 1	2019-11-25 09:36	37,410	2,735	34,675	Inner lid on a pressurized line	Manhole
859051	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2019-05-17 10:30	600	161	0	Manhole	Other sewer system structure

857652	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2019-04-11 11:09	12,945	0	0	Manhole	Manhole
857011	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2019-03-10 11:26	66,526	0	0	Pump Station-Power	Manhole
844946	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2018-02-15 06:45	139,500	139,500	0	Force Main	Force Main
826915	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2016-08-01 10:13	3,000	3,000	0	Gravity Mainline	Manhole
815348	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2015-05-06 08:51	823	823	0	Gravity Mainline	Manhole
813990	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2015-03-18 12:00	10,000	10,000	0	Gravity Mainline	Gravity Mainline
799180	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2013-08-31 10:35	19	19	0	Gravity Mainline	Manhole
797366	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2013-07-21 15:20	3	3	0	Main	Manhole
781909	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2012-05-08 00:00	6	0	0	Main	Gravity sewer
779656	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 1	2012-04-03 01:00	80,646	1,800	50,000	Main	Manhole;Pump station
773665	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2006-05-01 00:00	28,600	0	0	Main	Gravity sewer
769098	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2011-07-25 07:35	6,000	1,500	0	Pump Station	Pump station;Other (specify)
741515	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 1	2009-07-15 08:24	2,500	800	500		Manhole
738897	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2009-06-06 15:40	2,000	2,000	0	Main	Manhole
710593	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2007-12-11 07:30	500	200	0		Manhole
707556	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 1	2007-11-07 08:12	47,869	31,079	16,790	Main	Manhole
657198	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 2	2007-09-09 16:00	10,000	10,000	0		Manhole
650175	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 1	2007-05-02 09:17	1,500	700	200		Manhole
649155	8	Inland Empire Utilities Agency	Inland Empire Utilities Agency CS	8SSO10580	Category 3	2007-03-06 13:50	75	75	0		Gravity sewer

The current report was generated with data entered by Enrollees on the previous day.

[Back to Main Page](#) | [Back to Top of Page](#)

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