Sewer System Management Plan (SSMP)

2025 Update

Sanitary Sewer Collection System:

Waste Discharge ID (WDID): #8SSO10580

Inland Empire Utilities Agency
A MUNICIPAL WATER DISTRICT

REVIEWED AND APPROVED BY:

Lucia Diaz, Manager of Facilities & Water System Program
Legally Responsible Official
Inland Empire Utilities Agency

Sanitary Sewer Collection System
(includes Element Development Plans & Schedules)

PREPARED BY:

FISCHER COMPLIANCE LLC
PRACTICES THAT COMPLY

3/27/2025
Date Signed

Revision Date	SSMP Section	Approval Date	Description of Change/Revision Made	Initials

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March 7, 2025

Inland Empire Utilities Agency
Attn: Lucia Diaz, Legally Responsible Official (LRO)
6075 Kimball Ave
Chino, CA 91708

Dear Lucia,

We are pleased to present the new 2025 Sewer System Management Plan (SSMP) Update developed in partnership with Agency management. The 2025 Update meets and exceeds compliance with the Reissued WDR (State Water Board, Water Quality Order No. 2022-0103-DWQ, Attachment D-10 and Specifications 5.4). The 2025 SSMP has been completely revised to harmonize with industry standard guidelines and incorporates the latest SSMP Audit findings.

The 2025 SSMP is a declaration of what the Agency is doing to demonstrate full compliance with the Reissued WDR. Attachment A of the Reissued WDR (page A-4), states “A sewer system management plan is a living document which requires the Agency to Enrollee develops and implements to effectively manage its sanitary sewer system(s) in accordance with this General Order.” This requires the Agency to periodically review and update the SSMP as necessary until its next required 6-year SSMP Update is completed.

We look forward to assisting the Agency wherever necessary to fully implementation its new 2025 SSMP Update.

Sincerely,

James Fischer, P.E.

Principal, Fischer Compliance LLC

Credentialed U.S. EPA NPDES Compliance Inspector

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Introduction

This Sewer System Management Plan (SSMP) or "Plan" has been prepared for the Inland Empire Utility Agency (Agency) with technical assistance from Fischer Compliance LLC and Sam Rose Consulting for meeting and exceeding compliance with the State Water Resources Control Board 2022 General Waste Discharge Requirements, Order WQ 2022-0103-DWQ for Sanitary Sewer Systems (referred to throughout this document as the WDR). The Agency provided all details, information and institutional insights for preparation of the SSMP. The document has been developed to meet the size, scale, and complexity, serving as a "living document" used as a tool for managing and operating the agency's sanitary sewer collection system. Additionally, the latest 2024 Sewer System Management Plan Guidance Manual published by the Bay Area Clean Water Agency (BACWA) was utilized as a model for development of the document to harmonize formatting/content and incorporate recommended suggested guidance wherever possible.

The Agency's commitment to meeting or exceeding regulatory requirements, along with their proactive approach to operation and management of the collection system, has served them well, as evidenced by system performance relative to other agencies in the region and the state.

The figure below, provides key Agency spill metrics, including data comparing the Agency's spill record with state and regional system data for the period 8/2/2009 through 3/1/2025. The Agency consistently performs below both statewide and regional spill rate indices and net spill volumes for all categories of spills from its sanitary sewer collection system.

Collection System Spill Summary

Operational Indices: Inland Empire Utilities Agency CS

Spill Rate Indice (spills/100mi/yr)

	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Inland Empire Utilities Agency CS	0.04	N/A	0.04	0.44	0.04	0.31	0.0
State Municipal(Public) Average	1.48	N/A	0.46	0.56	0.51	2.89	0.51
Region Municipal Average	0.36	N/A	0.06	0.2	0.16	0.56	0.15

Net Volume Spills Indice (gallons/1000 Capita/yr)

	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Inland Empire Utilities Agency CS	5.41	N/A	2.38	5.62	0.31	0.03	0.0
State Municipal(Public) Average	1508.75	N/A	4555.09	323.66	2803.12	35.36	10.83
Region Municipal Average	129.29	N/A	2620.61	52.98	14.37	0.94	0.14

Figure 1 - Introduction: Collection Spill Summary

SSMP Organization

This SSMP is organized into 11 core elements following Attachment D of the WDR, with inclusion of applicable Specifications requirements.

Each individual element in the SSMP includes the following technical contents.

- Requirements – Provides the actual description of applicable requirements in the WDR.
- Compliance – Describes the Agency's approach to complying with the WDR requirements.
- Effectiveness – As measured by Key Performance Indicators (KPIs.)
- Implementation – Demonstrates how the Agency will ensure the Plan is being carried out as described.
- Resilience – Demonstrates the resilience that is addressed in the SSMP and built-in to the Agency's collection system and procedures.
- Appendix Inclusions – List the items included in the Appendix for each SSMP Element, if any.

Abbreviations and Acronyms[1]

AGENCY	Agency Name
BMP	Best Management Practices
CCTV	Closed Circuit Television
CIP	Capital Improvement Program
CIWQS	California Integrated Water Quality System (State Water Board Online Spill Database)
CMMS	Computerized Maintenance Management System
EPA	US Environmental Protection Agency
FOG	Fats, Oils and Grease
FSE	Food Service Establishment
GCD	Grease Control Device
GIS	Geographic Information System
HCFLS	High Cleaning Frequency Line Segments
I & I	Inflow and Infiltration
LRO	Legally Responsible Official
NPDES	National Pollutant Discharge Elimination System
RWQCB	Regional Water Quality Control Board (Santa Ana)
SCADA	Supervisory Control and Data Acquisition
SERP	Spill Emergency Response Plan
SOP	Standard Operating Procedure
SSMP	Sewer System Management Plan
Spill	Sanitary Sewer Overflow
WDR	Sanitary Sewer Systems General Wastewater Discharge Requirements Order issued by the State Water Board (Order No. 2022-0103-DWQ)
SWRCB	State Water Resources Control Board
WDID	Waste Discharge ID Number (CIWQS)

Table 1 – Abbreviations and Acronyms

[1] *For a list of additional common acronyms for collection systems and related WDR terms, see the* *WDR, Attachment A (page 32)*

1. Goal and Introduction

REQUIREMENTS

Att. D-1 (pg. D-2)

"The goal of the Sewer System Management Plan (Plan) is to provide a plan and schedule to: (1) properly manage, operate, and maintain all parts of the Enrollee's sanitary sewer system(s), (2) reduce and prevent spills, and (3) contain and mitigate spills that do occur.

The Plan must include a narrative Introduction section that discusses the following items (see below):"

1.1. Regulatory Context

WDR REQUIREMENTS

Att. D-1.1 (pg. D-2)

"The Plan Introduction section providing a general description of the local sewer system management program and discuss Plan implementation and updates".

COMPLIANCE

The Agency is committed to fully implementing the WDR[2] which includes addressing all requirements by integrating a wide range of programs specifically designed for ensuring the integrity and efficiency of the Agency's sanitary sewer collection system. Moreover, the Agency is dedicated to maintaining its collection system in a systematic manner by implementing various work programs, with a focus on critical areas, to prevent spills, allowing for a comprehensive approach to maintenance. Work programs include CCTV inspections, pipe cleaning, manhole inspections, lift station maintenance, root control, source control and pipe repair, just to name a few. Work programs are described in more detail in sections Specifications 5.19 Operation and Maintenance of this SSMP.

By prioritizing proactive measures and taking a comprehensive approach, the Agency is well-equipped with a proven track record of effectively operating its sanitary sewer collection system with the highest levels of service, complying with the WDR, and reducing/eliminating sewage spills.

Refer to Element 4 in the Agency's Operation and Maintenance Program for specific details to properly manage, operate, and maintain its sewer systems. Using the previous audit and in conjunction with the WDR, the Agency developed its SSMP goals listed below. The first two are to Directly measure the State's overall goals of reducing the number SSOs and volume spilled. The remaining six goals directly contribute to the first two and they mitigate the impact of SSOs should they occur.

[2] *Guidance 1.1.2*

Overall Goals:

Spill Frequency:

a. Maintain the Agency's SSO low spill average of one or less per year.
b. Be lower than the State or Region Municipal spill rate indices.

Spill Volume:

a. Recover more than 80% of gallons spilled.
b. Be lower than State or Region Municipal net volume spills indices.

Mitigators:

a. Preserve and improve the condition and performance of the wastewater collection system.
b. Maintain a highly trained staff.
c. Finish capturing closed-circuit television (CCTV) inspection data using the National Association of Sewer Service Companies (NASSCO) coding standards and placing in a geographic information system (GIS) of entire RSS and BSS systems.
d. Track budget versus actual expenditures.
e. Conduct a condition assessment of both RSS and BSS systems.
f. Communicate the causes and effects of spills with member (satellite sewer) agencies.

Table 2 below lists key performance indicators (KPIs) that will assist in measuring our performance in attaining our goals.

KPI	Description	Goal	Related Goal #
Spill Frequency	• Maintain low spill numbers • Spill Rate Indices (# spills/100 mi/yr.)	• Maintain less than 1 spill per year average • Be lower than the state and region	1
Spill Volume	• Spill recovery • Net Volume Spills Indices (gallons/1000 Capita/yr.)	• Recover more than 80% of gallons spilled • Be lower than the state and region	2
Preventive Maintenance (PM) Completion	• Average % of PM Completed	• 90% or greater	3
Inspection & Cleaning Production	• Inspection & Cleaning Footage	• Maintain an average inspection rate and cleaning rate of 3 years (~ 5,000 ft./week each) • Reinspection of the entire system every 5 years	3 & 5
Training	• Safety & professional training	• Complete 100% the Agency's safety training • Complete100% continued education units • Complete 80% or better in-house professional training • Maintain NASSCO coding certifications	4
Capital Spending	• Budget vs. Actual expenditures	• Spend 95%+/-5%	3 & 6

Table 2- Goals and Associated Key Performance Indicators (KPIs)

EFFECTIVENESS

N/A

IMPLEMENTATION PLAN/SCHEDULE

N/A

1.2. SSMP Update Schedule

WDR REQUIREMENTS

Att. D-1.2 (pg. D-3)

"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."

COMPLIANCE

The Agency utilizes the State Water Board's online lookup tool for ensuring all required due dates for updating its SSMP and completing its required SSMP Audits (see chart below).

The Agency's most recent SSMP audit was completed for the period May 2021 through May 2024.

Notable maintenance milestones include optimization of several proactive preventative measures to prevent spills. This includes a 60-month target (5 years) for cleaning the entire gravity system, with more frequent focused cleanings in specific areas scheduled more frequently (monthly, quarterly, and annually), all tracked in GIS. The CCTV target for inspecting the entire gravity system is scheduled on a 60-month target (5 years), including close monitoring of known issue areas requiring capital improvement projects on a continuous basis throughout the 6-year SSMP update cycle. More detailed work program information for cleaning and CCTV are described in the subsequent elements below.

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.

8SSO10580

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 2 – Sewer System Management Plan, Subsequent Update and Audit Due Dates

EFFECTIVENESS

Key Performance Indicators:

1. Are SSMP Audits and SSMP Updates being performed as scheduled?
2. Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)?
3. Are specific internally established sewer program milestones being monitored?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Mgr.	**Env.**	**CS**
1.2.1	Prepare for next SSMP Audit	Begin 5/2/2027	X		X
1.2.2	Complete and Upload SSMP audit.	By 11/2/2027	X	X	
1.2.3	Incorporate Audit Findings, update Change Log and Update SSMP	5/2/2025	X	X	X
1.2.4	Board Approval and LRO Certification of SSMP	By 5/2/2025	X	X	

1.3. Sewer System Asset Overview

WDR REQUIREMENTS

Att. D-1.3 (pg. D-3)

"The Plan Introduction section must provide a description of the Enrollee-owned assets and service area, including but not limited to:

a. *Location, including county(ies).*
b. *Service area boundary.*
c. *Population and community served. 111,000*
d. *System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons.*
e. *Structures diverting stormwater to the sewer system.*
f. *Data management systems.*
g. *Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals.*
h. *Estimated number or percentage of residential, commercial, and industrial service connections; and*
i. *Unique service boundary conditions and challenge(s).*
j. *Additionally, the Plan Introduction section must provide 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."*

COMPLIANCE

The Chino Basin Municipal Water Agency (CBMWD) was created in 1950 by popular vote with the mission to supply supplemental water to the Chino Basin. On July 1, 1998, the CBMWD was named Inland Empire Utilities Agency (IEUA) to better reflect the service area it serves and its activities. Since then, the Agency has expanded its areas of responsibility from a supplemental water supplier to a regional wastewater treatment agency, including domestic and industrial wastewater disposal systems and energy recovery and production facilities. The Agency's vision is the enhance the quality of life throughout our region by leading the way in water management and environmental stewardship. The mission is to provide essential water and wastewater services in a regionally planned and cost-effective manner, while safeguarding public health, supporting community needs, and protecting the environment.

The Agency's five-member (satellite sewer) Board of Directors is elected to represent approximately 935,000[3] residents within the Agency's 242 square mile service area. Each Board member (satellite sewer) is elected by Division to serve a four-year term.

The Agency serves seven cities with its five water recycling facilities (refer to Figure 3 below). Those facilities include the following:

Representing the North Region:

- Regional Water Recycling Plant No. 1 (RP-1)
- Regional Water Recycling Plant No. 4 (RP-4)

[3] 2024 Population estimate California Department of Finance – http://www.dof.ca.gov/Forcasting/Demographics/Estimates/E-1/)

Representing the South Region:

- Regional Water Recycling Plant No. 2 (RP-2)
- Regional Water Recycling Plant No. 5 (RP-5)
- Carbon Canyon Water Recycling Facility (CCWRF)

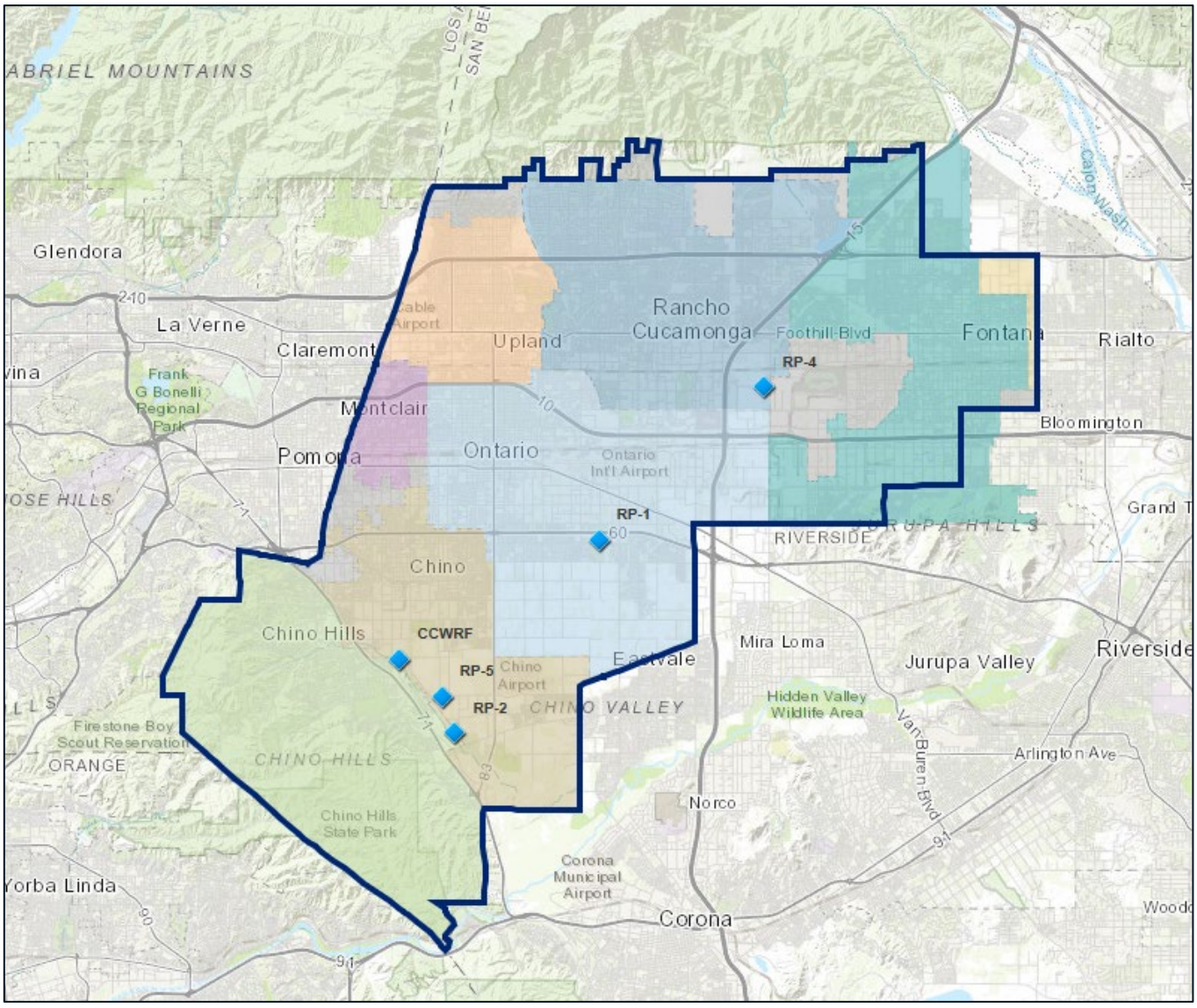


Figure 3 - Agency Service Area, Regional Contracting Agencies, and Facilities

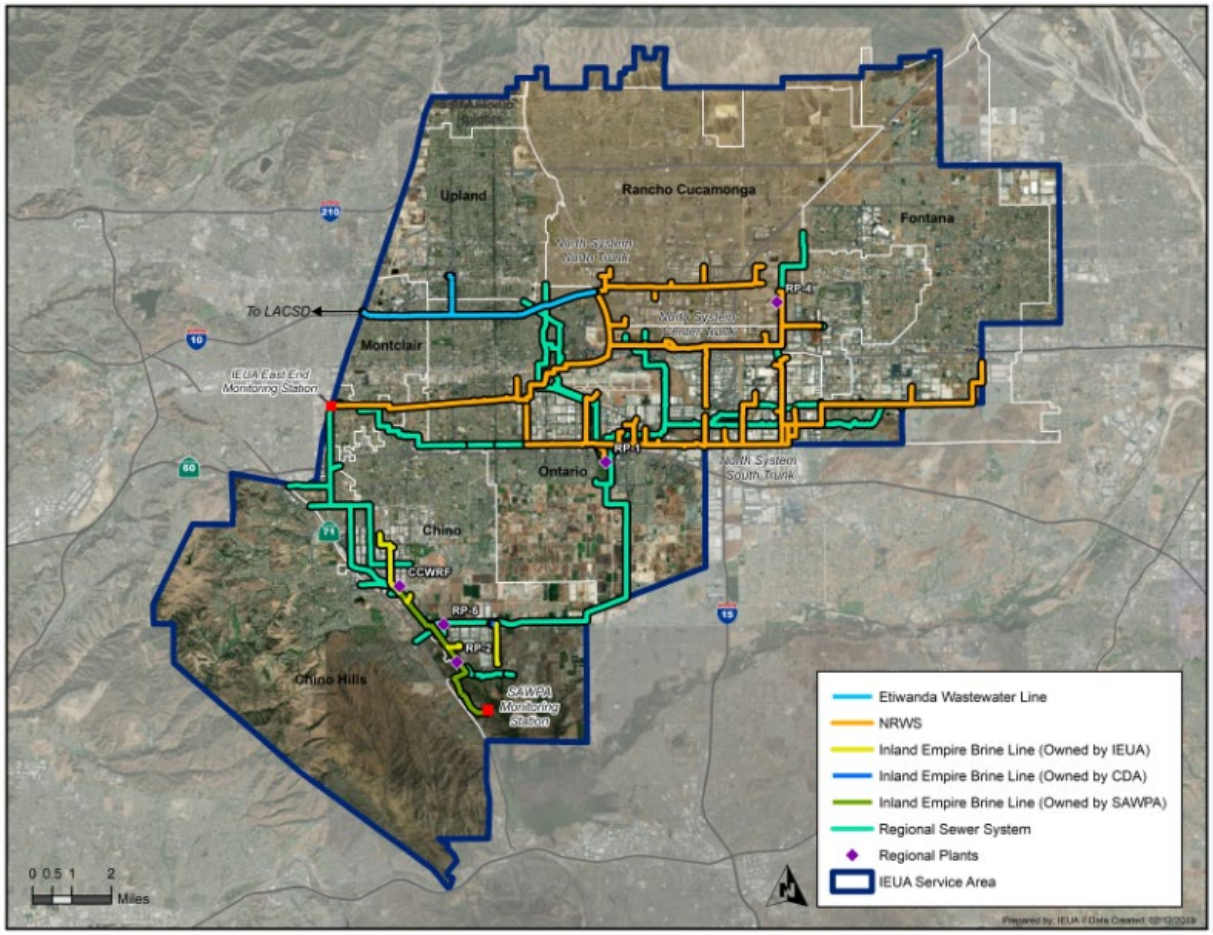


Figure 4 - Agency Regional and Brine Pipeline Collection System

The Agency operates two separate pipeline collection systems – The Regional Sewer System (RSS) and the Brine Sewer System (BSS). The RSS serves to convey primarily domestic wastewater to the Agency's Regional Water Recycling facilities. The BSS collects and conveys wastewater containing high levels of dissolved salts outside the Agency's service area due to the restrictive salinity requirements imposed upon the Agency's Regional Water Recycling facilities. The BSS is comprised of three separate collection systems: the Etiwanda Waste Etiwanda Wastewater Line (EWL), the Non-Reclaimable Wastewater System (NRWS), and the Inland Empire Brine Line (Brine Line). The Brine Line is further broken down by ownership – the Agency, Chino I Desalter (CDA), or Santa Ana Watershed Project Authority (SAWPA). The EWL and the NRWS lines discharge to Los Angeles County Sanitation Districts (LACSD) and the Brine Line discharges to Orange County Sanitation District (OC San).

IEUA's sewer system consists of pump stations, trunk and interceptor lines. The sewage transported is from the seven (7) satellite systems that are served by IEUA. There are no direct building connections.

Sewer assets are all located in San Bernardino County covering 242 square miles providing regional collection wastewater services to a population of approximately 935,000. The sanitary sewer collection system assets include approximately 135 miles of regional gravity mainline sewers and 11.3 miles of force main (pressurized) sewers within the service area, and the Agency does not have any stormwater diversion structures.

The Agency has determined the following unique challenges for its routine and emergency operations and maintenance of its collection system:

- Required oversight/coordination with seven (7) individually owned/operated upstream (satellite) collection systems from multiple jurisdictions in certain areas of the system, periodically presenting challenges with routine sewer maintenance/cleaning and emergency response operations.
- Periodic increases in sanitary sewer inflow and infiltration (I/I) from upstream member (satellite) sewer agencies.
- No direct customers/control for mitigation of Pipe Blockage Control Program (the Agency coordinates and relies on success of its upstream member (satellite) sewer agencies for ensuring successful implementation of this program

Estimated customer connection flow classifications and connections data are presented in Table 3 below for residential, commercial, industrial, and institutional sources.

Use Type	Number of Connections
Residential	0
Commercial	0
Institutional	1
Industrial	68

EFFECTIVENESS

Key Performance Indicators:

- Are asset statistics periodically reviewed and updated as necessary?
- Are omissions or errors addressed in a timely manner?
- Are system maps up to date?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
1.3.1	Review Agency-owned asset statistics and element description; update as necessary	At the beginning of the audit cycle and when significant changes have been made.		X	X
1.3.2	Update Maps	Within 30 Days of Correction Submittal of Completion of Development Project		X	

RESILIENCE

Resilience is addressed for Element 1 by:

- Adhering to an SOP for collecting and managing asset data.
- Redundancy: More than one-member upstream member (satellite) sewer agencies of staff is trained and able to retrieve and manage the data.
- Implementing a QA/QC process to help ensure information is accurate.
- Using Calendar Reminders to ensure compliance deadlines are met.

APPENDIX 1 INCLUSIONS:

- 1.1 Project of the Year Description

Specifications 5.2 – SSMP Development and Implementation

WDR REQUIREMENTS

Spec. 5.2 (pg. 18)

"To facilitate adequate local funding and management of its sanitary sewer system(s), the Agency shall develop and implement an updated Sewer System Management Plan. The scale and complexity of the Sewer System Management Plan, and specific elements of The SSMP, must match the size, scale, and complexity of the Enrollee's sanitary sewer system(s). The Sewer System Management Plan must address, at minimum, the required Plan elements in Attachment D (Sewer System Management Plan – Required Elements) of this General Order. To be effective, the Sewer System Management Plan must include procedures for the management, operation, and maintenance of the sanitary sewer system(s). The procedures must: (1) incorporate the prioritization of system repairs and maintenance to proactively prevent spills, and (2) address the implementation of current standard industry practices through available equipment, technologies, and strategies."

COMPLIANCE

The Agency's current Sewer System Management Plan (SSMP) has been updated to meet the requirements of Order WQ 2022-0103-DWQ and addresses the required Elements. The SSMP addresses management, operations and maintenance procedures specific to the Agency's collection system. The Agency maintains a proactive O&M program to operate its system and identify defects, which are then prioritized for repair, replacement, rehabilitation, or placed on modified maintenance schedules. (See Elements 4 and 8 and Specifications 5.19 of this SSMP for more detail.)

The Agency keeps up with current industry standards, technology and best practices by reviewing industry periodicals, networking and attending industry conferences and workshops. This includes but not limited to the following:

- Continuous lunch and learns/local/regional networking.
- Attending California Water Environment (CWEA) Foundation trainings and conference events.
- Isle North America Utilities Technical meetings and workshops.
- California Association of Sanitation Agencies (CASA) events
- Trainings and participation via mutual agreement program with upstream member (satellite) sewer agencies

Specifications 5.7 – Allocation of Resources

WDR REQUIREMENTS

Spec. 5.7 (pg. 22)

"The Agency shall comply with the following requirements:

- *Establish and maintain a means to manage all necessary revenues and expenditures related to the sanitary sewer system; and*
- *Allocate the necessary resources to its sewer system management program for: (a) compliance with this General Order, (b) full implementation of its updated SSMP, (c) system operation, maintenance, and repair, and (d) spill responses."*

COMPLIANCE

The Agency maintains various revenue sources to maintain financial stability, meet its operational needs and manage all necessary expenditures for its sewer system operation. The primary source of revenue is the annual Sewer Service Rate Charge, which is collected from customers and used for:

a. Agency's share of operation and maintenance
b. Plant improvements, equipment replacement, and modification
c. Maintenance and operation of Agency wastewater collection and conveyance system
d. Collection system maintenance equipment and construction
e. General administrative services
f. Extension of service of collection system
g. General and unappropriated reserves

The Agency collects a connection fee that funds the installation of facilities to areas not yet served and to upsize pipes to ensure the line is adequate for the Agency. The Agency is adequately staffed and owns and operates the necessary equipment to effectively maintain its collection system.

The Agency collects a connection fee that funds the installation of facilities in areas not yet served and supports the upsizing of pipes to ensure adequate system capacity. The agency relies on several funding sources to support its Capital Improvement Projects (CIP) aimed at improving and expanding the regional system.

Developers contribute significantly to funding growth-related infrastructure. They provide the necessary funds, which are distributed when specific projects are undertaken. This includes extending pipes to underserved areas and ensuring capacity is added to accommodate future growth.

In addition to developer contributions, connection fees are collected to ensure that the system has enough capacity to meet increasing demand. Developer fees also help fund infrastructure improvements and system upgrades, which are vital for supporting new developments and maintaining system integrity.

Taxes, particularly general tax revenues, may also contribute to certain CIP projects, with funds allocated for improvements that enhance overall system performance. Additionally, the Agency can pursue state and federal grants for specific projects that focus on improving regional system support or meeting regulatory requirements. These grants provide critical funding for large-scale infrastructure projects that may exceed local funding capabilities.

The agency currently owns and operates the necessary equipment to effectively maintain its collection system.

Looking ahead, the Agency is actively working towards increasing staffing over the next three years to meet the growing demands of the region's infrastructure. The agency recognizes the importance of a well-staffed and

equipped team to efficiently maintain and enhance the collection system in response to future growth and evolving system needs.

Provisions 6.1 - Enforcement Provisions

WDR REQUIREMENTS

Provisions 6.1 (pg. 27)

"The following enforcement provisions are based on existing federal and state regulations, laws and policies, including the federal Clean Water Act, the state Water Code and the State Water Board Enforcement Policy."

COMPLIANCE

The Agency is aware of the consequences for noncompliance including associated penalties for violations. The Agency maintains a proactive stance with full implementation of its SSMP.

Noncompliance with requirements of this General Order or discharging sewage without enrolling in this General Order constitutes a violation of the Water Code and a potential violation of the Clean Water Act and is grounds for an enforcement action by the State Water Board or the applicable Regional Water Board. Failure to comply with the notification, monitoring, inspection, entry, reporting, and recordkeeping requirements may subject the Enrollee to administrative 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. Discharging waste not in compliance with the requirements of this General Order or the Clean Water Act may subject the Enrollee to administrative civil liabilities up to $10,000 a day per violation and additional liability up to $10 per gallon of discharge not cleaned up after the first 1,000 gallons of discharge; up to $5,000 a day per violation pursuant to Water Code section 13350 or up to $20 per gallon of waste discharged; or referral to the Attorney General for judicial civil enforcement.

Provisions 6.3 Sewer System Management Plan Availability

WDR REQUIREMENTS

Provisions 6.3

"The Enrollee's updated Sewer System Management Plan must be maintained for public inspection at the Enrollee's offices and facilities and must be available to the public through CIWQS and/or on the Enrollee's website, in accordance with section 3.8 (Sewer System Management Plan Reporting Requirements) of Attachment E1 (Notification, Monitoring, Reporting and Recordkeeping Requirements) of this General Order."

COMPLIANCE

The Agency publishes its SSMP, available for public review, on its website and also maintains a paper copy in its offices which can be made available for inspection during regular business hours.

2. Organization

WDR REQUIREMENTS

Att. D-2 (pg. D-3)

"The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organization chart or 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 agency, and State Office of emergency Services.)*

COMPLIANCE

To comply with this section, the Agency has established multiple qualified Legally Responsible Officials and Data Submitters or redundancies. The remaining above items are addressed below.

IMPLEMENTATION RESPONSIBILITIES

Sewer System Management Plan Elements	Responsible Position
1. SSMP Plan, Goal and Introduction	Manager of Facilities & Water System Programs
1.1. Regulatory Context	Manager of Facilities & Water System Programs
1.2. SSMP Update Schedule	Manager of Facilities & Water System Programs
1.3. Sewer System Asset Overview	Manager of Facilities & Water System Programs
2. Organization	Manager of Facilities & Water System Programs
3. Legal Authority	Manager of Compliance and Sustainability & Manager of Environmental Services
4. Operations and Maintenance Program	Manager of Facilities & Water System Programs & Sewer Collection supervisor
4.1. Updated maps of Sanitary Sewer System	Sewer Collection supervisor
4.2. Preventive Operation & Maintenance	Sewer Collection supervisor
4.3. Training	Sewer Collection supervisor
4.4. Equipment Inventory	Sewer Collection supervisor
5. Design/Performance	Manager of Engineering
5.1. Updated Design Criteria & Construction Standards	Manager of Engineering
5.2. Procedures and Standards	Manager of Engineering
6. Spill Emergency Response Plan	Sewer Collection supervisor
7. Sewer Pipe Blockage Program	Sewer Collection supervisor
8. System Eval, Agency Assurance, Capital Imp.	Manager of Engineering
8.1. System Evaluation and Condition Assessment	Manager of Asset Management
8.2. Agency Assessment and Design Criteria	Manager of Asset Management & Manager of Engineering
8.3. Prioritization of Corrective Action	Manager of Asset Management & Manager of Engineering
8.4. Capital Improvement Plan	Manager of Asset Management & Manager of Engineering
9. Monitoring, Measurement & Program Modifications	Manager of Facilities & Water System Programs
10. Internal Audits	Manager of Facilities & Water System Programs
11. Communication Program	Communications Officer

Table 3 – Implementation Responsibilities

RESPONSIBLE POSITION CONTACT INFORMATION

Responsible Position Contact Information	Phone	Email
Lucia Diaz, Manager of Facilities and Water System Programs	(909) 342-2365	ldiaz@ieua.org
Kenneth Tam, Manager of Environmental Services	(909) 993-1917	ktam@ieua.org
Jason Marseilles, Manager of Engineering	(909) 993-1823	jmarseilles@ieua.org
Travis Sprague, Manager of Asset Management	(909) 993-1942	tsprague@ieua.org
Edward Makowski, Collection System Supervisor	(909) 497-4934	emakowski@ieua.org
Andrea Carruthers, Communications Officer	(909) 993-1935	acarruthers@ieua.org

Table 4 – Responsible Position Contact Information

Organizational Lines of Authority

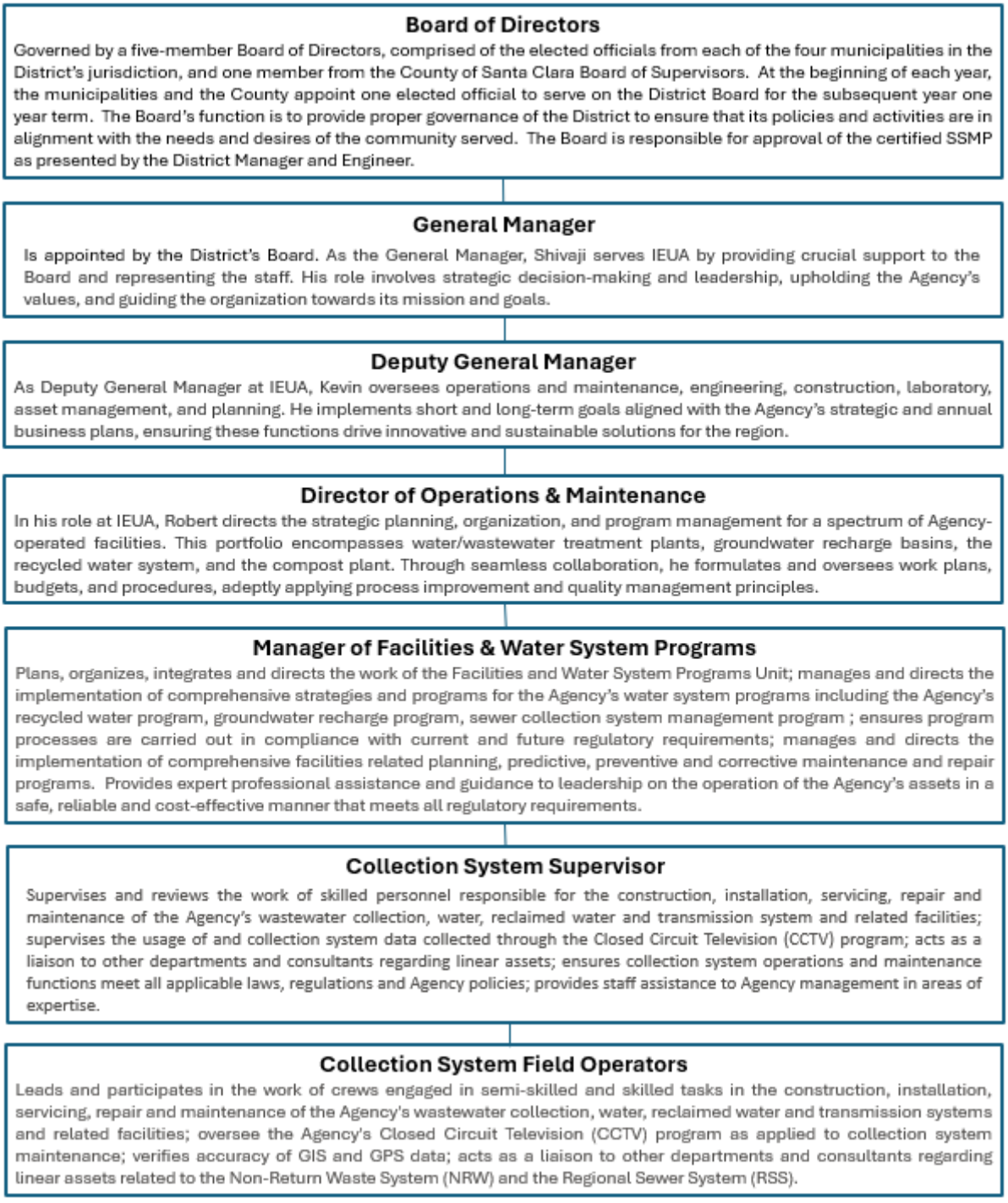


Figure 5 – Organizational Lines of Authority

Abbreviated Organizational Chart

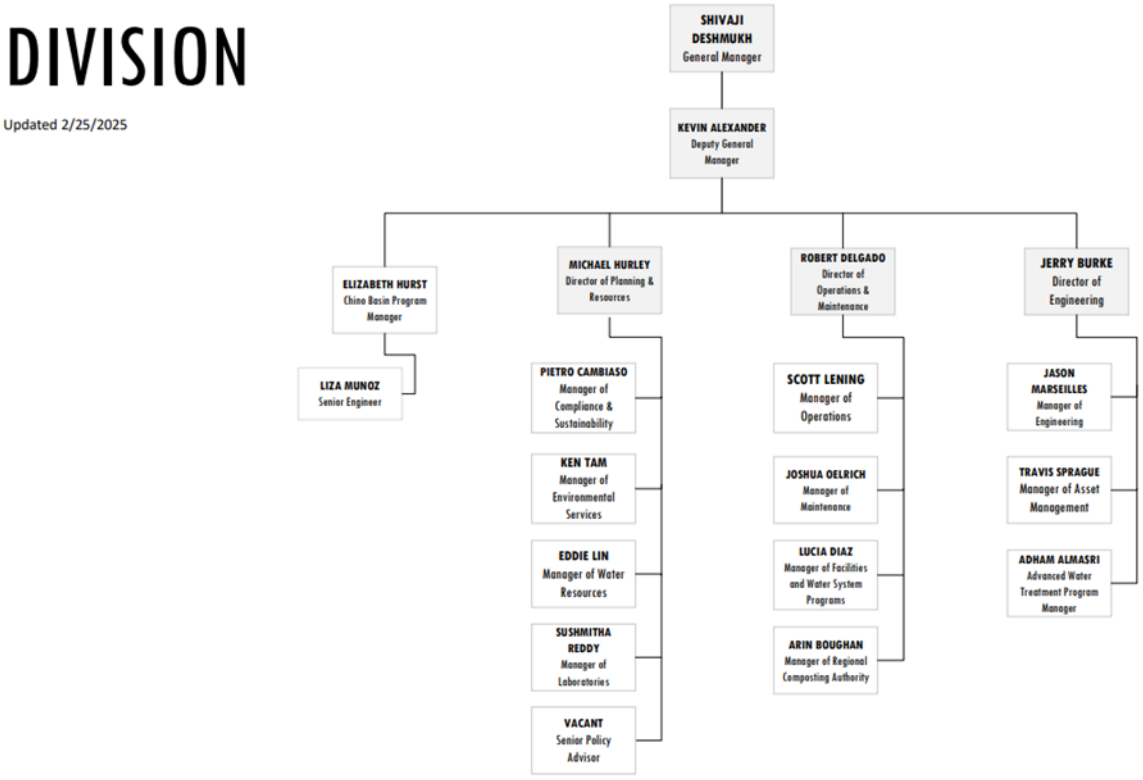


Figure 6 – Abbreviated Organizational Chart

Chain of Communication for Reporting Spills

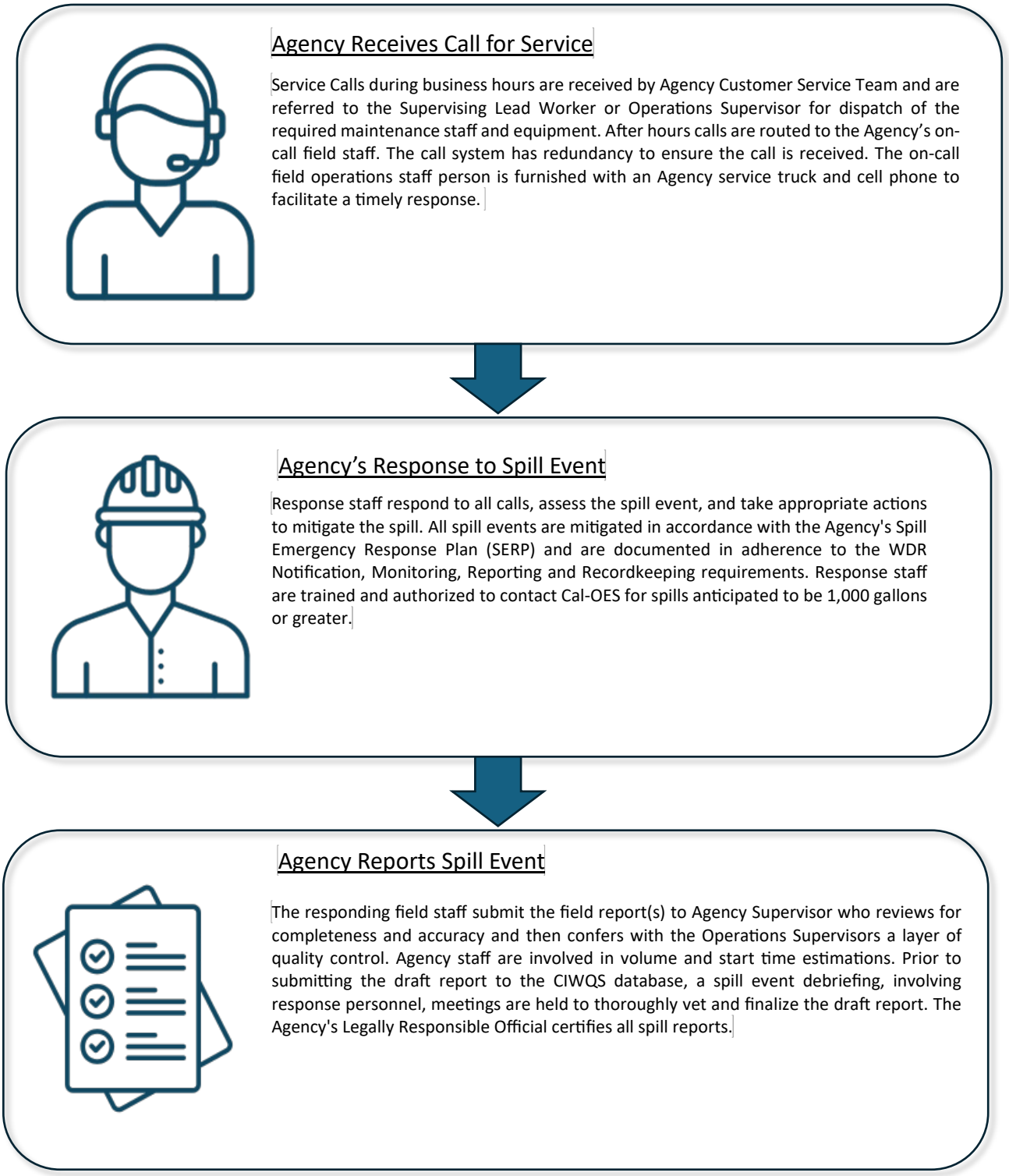


Figure 7 – Chain of Communication for Reporting Spills

SPILL INCIDENT COMMAND

In the event that command personnel are absent, the specific order of command is as follows:

1. Agency Manager (LD)/ (KT)
2. Director of Operations and Maintenance
3. Operations Supervisor (EM)
4. Supervising Lead Worker
5. Lead Worker

MUTIAL AID CONTACTS AND RESOURCES

In the event that command personnel are absent, the specific order of command is as follows:

The eight mutual aid regional contracting authorities and the Agency's upstream member (satellite) sewer collection agencies. These groups have agreements with the Agency for providing mutual aid for spills (see Table 6 for a list of mutual aid contacts and lists of equipment for supporting sewage spills). For additional details, see Element 6 (Spill Emergency Response Plan).

Mutual Aid Contacts and List of Equipment

Mutual Aid Contact and Resources List						
IEUA						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Manager of Facilities & Water System Programs	Lucia Diaz	(909)993-1631	(909)342-2365	ldiaz@ieua.org	2 GapVax Trucks, Camera Van, 2 Traffic Trucks, Water Truck, 4"& 6" & 8" Trash Pumps, Confined Space Trailer and Equipment, 10 Yd Dump truck, Backhoe, 36"-60" Inflatable Sewer Plug, Portable Lighting, Cues Pole Camera	(951)675-1131
Collection System Supervisor	Ed Makowski	(909)993-1720	(909)497-4934	emakowski@ieua.org		
Senior Collections System Operator	Edward Chavez	N/A	(909)217-1595	echavez@ieua.org		
Senior Collections System Operator	Adolfo Zavala	N/A	(909)497-4928	azavala@ieua.org		
Cucamonga Valley Water District						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Construction & Maintenance Superintendent	Robert Koczko	(909)987-2591	(909)912-9718	robertk@cvwdwater.com	(2) Bypass 6" Pumps, (1) tandem axle bypass pump and hose reel 6" various lengths, (3) Sewer Vactor Combination units, (2) CCTV Camera trucks, (1) Confined Space Van and Equipment, Inflatable Sewer Plugs 8"-36"	(909)987-2591
Waste Water Supervisor*	Shawn Spromberg	(909)483-7413	(909)912-4099	shawns@cvwdwater.com		
Water Utility	James Bryan	(909)207-1450	(909)990-5558	jamesb@cvwdwater.com		
City of Chino						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Public Works Services Manager*	Ben Orosco	(909)334-3445	(909)772-0517	borosco@cityofchino.org	Sewer Vactor Jet Truck, Water Truck, 10 Yd^3 Dump Truck, Backhoe, 4" Water Pump, 4" trailered bypass pump	(909)628-1234 Police
Asst. Public Works Services Manager	Keith Martinez	(909)334-3421	(760)403-3476	kmartinez@cityofchino.org		
Wastewater Maintenance Lead Worker	Andy Llamas	(909)334-3430	(909)497-4818	allamas@cityofchino.org		
City of Chino Hills						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Collections Supervisor*	Ismael Tapia	(909)364-2829	(909)573-4366	itapia@chinohills.org	Vactor Truck, Camera Van, 6" Trash Pump, Backhoe, Jetter truck , 10 Ton Dump Truck, Skip Loader.	(909)364-2860
Water and Sewer Manager	Mark Wiley	(909)364-2854	(909)573-4375	mwiley@chinohills.org		
City of Fontana						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Public Works Manager	Kyle Scribner	(909) 350-6530	(951)852-1554	kscribner@fontanaca.gov		
Utilities and Streets Supervisor*	Christopher Garcia	(909) 350-6760	(909)350-6764	cgarcia@fontanaca.gov		
City of Montclair						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Public Works Operations Assistant Manager*	Alex Cardona	(909)625-9467	(909)762-1372	acardona@cityofmontclair.org	Sewer Jetter Truck, Camera Van, Water Truck, Backhoe,1- 7 Yd^3 and 2-2 Yd3 Dump Trucks, 8" Trash Pump, Confined Space Trailer	(909)905-0410
Lead Sewer Worker	Alex Perez	N/A	(909)721-1777	aperez@cityofmontclair.org		
City of Ontario						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Utilities Operations Manager	Andy Marquez	(909)395-2691	(909)721-8931	amarquez@ontarioca.gov	Vactor/Water Truck, Camera Van, Water Truck, 5 Yd^3 Dump Truck, Backhoe, (2,4,6,8) inch Trash Pump	(909)721-7246
Utilities Supervisor*	Danny Fernandez	(909)395-2778	(909)915-5683	dfernandez@ontarioca.gov		
City of Upland						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Utilities Supervisor*	Jason Lara	909-376-1812	(909)573-3434	jlara@uplandca.gov	Vactor combo truck, 2 vacccon combo trucks, 1 cctv truck, 6" trash pump, 2 backhoes, 2 10yd dumps.	(909)296-0133
Jurupa Community Services District						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
Utilities Superintendent	Aaron Anderson	(951)685-7434	(951)300-7349	aanderson@jcsd.us	(2) Vactor Combo Trucks, (1) Straight Jetter, (2) CCTV Van, SSO Bypass Trailer Hose Reel W/ 4" & 6"Hose lengths with 6" HH trash Pump	(951)830-3533
Utility Supervisor*	Ricky Tejada	(951)685-7435	(951)790-7948	rtejada@jcsd.us		
Utility Lead	Armando Leal	(951)685-7434	(626)423-3494	aleal@jcsd.us		
Sewer Lead	Juan Flores	(951)685-7434	(951)237-7106	jflores@jcsd.us		
City of Pomona						
Position	Name	Work #	Cell #	Email	Equipment available	On Call #
					(2) Vactor Combo Unit Trucks,(1) Vactor Jetter (1) CCTV Truck, (4,6) Trash Pump, (2)Envirosight Pole Camera, Confined Space Equipment.	(909)-772-4105
Wastewater System Supervisor*	Romell Eutsey	(909)841-5866	(760)514-3218	Romell.Eutsey@pomonaca.gov		

* = primary point of contact

Table 5 - Mutual Aid Contacts and List of Equipment

The Agency also maintains an outside contractor (see Appendix 6.2 below) for assisting the Agency with emergency response operations and also sewer system repairs. These are categorized by general, electrical, mechanical, sewer, and miscellaneous (HVAC, Hazardous, Welding, etc.) engineering and construction support.

EFFECTIVENESS

Key Performance Indicators:

1. Have there been any changes requiring updates to the Organizational Chart?
2. Have there been instances when a service call for a spill was not properly routed to response personnel?
3. Were all spill response activities documented and forwarded to the LRO?
4. Have there been any changes in assigned responsibilities for implementing the Sewer System Management Plan?
5. Is there a process in place to ensure all contact information remains up to date?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
2.1	Review names, contact information and position responsibilities. Update as necessary.	Semi-Annually	X		X
2.2	Review Chain of Communication outcomes for all spill responses	Each Spill Event	X		X
2.3	Review Organizational Chart for any changes. Update as necessary.	Semi-Annually	X		X

RESILIENCE

Resilience is addressed for Element 2 by:

- Ensuring that more than one person is capable and responsible for specific duties for Sewer System Management Plan implementation, e.g., back-up personnel.
- Designation of more than one LRO to help ensure full and continuous coverage of duties.
- Testing the phone notification system to ensure calls are received and routed to appropriate personnel.

APPENDIX 2 INCLUSIONS:

- Table 2 Contact information

3. Legal Authority

WDR REQUIREMENTS

Att. D-3 (pg. D-4)

"The 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 to:

a. 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 may cause blockages.
b. 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.
c. Require that sewer system components and connections be properly designed and constructed.
d. Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee.
e. Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures; and
f. Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.

COMPLIANCE

The above items are addressed in order below:

a. Authority to Prevent Illicit Discharges into Agency's Wastewater Collection System.

The Agency's legal authority objectives are as follows – prevent illegal discharges by requiring discharge permits, proper design and construction of sewer systems, access or right of entry to any property connected to the sewer system, and dischargers to meet discharge limits, charges, and fees for services. The Agency's achieves these objectives by means of Ordinances, Permits, Resolutions, and industry accepted standard practices. The Agency's Regional and NRWS collection systems are governed by three ordinances – Regional Wastewater System Ordinance No. 109, Ordinance No. 99, Ordinance No. 106. The Regional Wastewater System is a collection and conveyance system providing service for primarily residential neighborhoods with some commercial and industrial dischargers that meet the Agency's pretreatment discharge local limits. The NRWS is a collection and conveyance system dedicated to industrial wastewater discharges containing high levels of dissolved salts. This system is composed of three independent sub-systems – 1) the IEBL formerly known as the Santa Ana Regional Interceptor (SARI) which is owned by the Santa Ana Watershed Project Authority (SAWPA) that discharges to the Orange County Sanitation Agencies (OCSD), and 2) the NRWS and 3) the EWL systems that discharges to County Sanitation Agencies of Los Angeles County (CSDLAC). Table 6 below summarizes the Agency's ordinances and legal authorities.

Requirement	Legal Authority Reference
Prevent illicit discharges into the wastewater collection system	Ordinance No. 107 (Section 2 - General Sewer Use Requirement) Ordinance No. 99 (Section 2 - General Sewer Use Requirement) Ordinance No. 106 (Article 2 - Prohibited Waste Discharges)
Limit the discharge of fats, oils, grease and other debris that may cause blockages	Ordinance No. 107 (Section 2 - General Sewer Use Requirement) Ordinance No. 99 (Section 2 - General Limitations on Non-Reclaimed Wastewater) Ordinance No. 106 (Article 2 - Prohibited Waste Discharges)
Sewers and connections be properly designed and constructed	Ordinance No. 107 (Section 3 - Pretreatment Facilities) Ordinance No. 99 (Section 6 - Pipeline Construction) Ordinance No. 106 (Article 4 - Wastewater Discharge Permits)
Proper installation, testing, and inspection of new and rehabilitated sewers	Ordinance No. 107 (Section 3 - Pretreatment Facilities) Ordinance No. 99 (Section 6 - Pipeline Construction) Ordinance No. 106 (Article 4 - Wastewater Discharge Permits)
Clearly define Agency responsibilities and policies	Regional Sewage Service Contract (dated November 1, 2023) Ordinance No. 114 – Regional Sewage Service Ordinance Resolution No. 2024-6-11 – Establishing Regional Industrial Pretreatment Program Services
Ensure access for maintenance, inspection or repairs for portions of the service lateral owned or maintained by the Agency	Ordinance No. 107 (Section 7 - Right of Entry) Ordinance No. 99 (Section 7 - Inspection & Entry) Ordinance No. 106 (Article 4 - Wastewater Discharge Permits) Regional Pre-Treatment Agreements
Control infiltration (I/I) from private service laterals	Ordinance No. 107 (Section 4 - Independent Wastewater Discharge Permit Contents) Ordinance No. 99 (Section 6 - Wastewater Discharge Permits) Ordinance No. 106 (Article 4 - Wastewater Discharge Permits)
Install grease removal devices (such as traps or interceptors), design standards for grease removal devices, maintenance requirements, BMP requirements, record keeping, and reporting requirements	Ordinance No. 107 (Section 5 - Independent Wastewater Discharge Permit Contents) Ordinance No. 99 (Section 7 - User Permit Conditions) Ordinance No. 106 (Article 5 - Interceptor Requirements) Resolution No. 2024-6-11 – Establishing Regional Industrial Pretreatment Program Services
Authority to inspect grease producing facilities	Ordinance No. 107 (Section 7 - Right of Entry) Ordinance No. 99 (Section 7 - Inspection and Entry) Ordinance No. 106 (Article 5 - Inspection) Regional Sewage Service Contract (dated November 1, 2023) Ordinance No. 114 – Regional Sewage Service Ordinance Resolution No. 2024-6-11 – Establishing Regional Industrial Pretreatment Program Services
Enforce any violation of its sewer ordinance	Ordinance No. 107 (Section 10 - Administrative Enforcement Remedies) Ordinance No. 99 (Section 8 - Enforcement) Ordinance No. 106 (Article 6 - Enforcement) Resolution No. 2024-6-11 – Establishing Regional Industrial Pretreatment Program Services

Table 6 - Summary of Agency Ordinances and Legal Authorities

Illicit discharges include, but are not limited to, the release of I/I, storm water, chemical dumping, unauthorized debris and constituents, and grease.

Ordinance 107 requires that all new connections to the public sewer system be tested specifically for potential infiltration. The testing is performed in accordance with the standards set forth in the latest edition of the Greenbook.

Ordinance 99 & 106, Deposit in Sewer Restricted, of Title 12, includes a general description of the various types of substances restricted from being directly or indirectly discharged into the collection system. The restrictions are applicable to all users of the Agency's system except as permitted by other Agency ordinances and the OCSD regulations.

b. The Agency's pre-planned collaboration and coordination with storm drain agencies.

   The Agency has established collaboration with its upstream member (satellite) sewer agencies responsible for operating and maintaining municipal separate stormwater sewer systems (MS4s). This includes documenting meetings, collaborating on emergency spill trainings, and discussing any potential issues of concern that could impact either operations or emergency spill response operations with these entities.

c. Require that sewer system components and connections be properly designed and constructed.

   The Agency relies on its existing standards for installation, rehabilitation, and repair for its sanitary sewer system to meet this requirement (see Element 5 below for details). The Agency also relies on existing design and performance design documents (see below) available from its Engineering department.

   - Agency's Standard for Manholes
   - Agency's Standard for Connections
   - Agency's Standard for Bedding and Backfill
   - Agency's Engineering Design Guidelines
   - Copies of *Standard Specifications for Public Works Construction "GREENBOOK"*

d. Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the Enrollee.

   The majority of Agency sewer assets within the Agency service area require sewer easements. During Agency inspections or upstream member (satellite) sewer agency construction projects, locations identified as lacking proper easement access are coordinated with all local municipalities to identify each location and ensure proper access can be obtained.

e. Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures

   Three specific chapters of the Agency Ordinance Codes (Ordinances 107, 99, and 106) contain authority for enforcement to address noncompliance.

f. Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.

EFFECTIVENESS

Key Performance Indicators:

a. Are the Agency ordinances and standards adequate for fulfilling the Sewer System Management Plan legal requirements?
b. Does the Agency have a process in place for periodic review and evaluation of ordinances?
c. Have there been instances when the code or ordinance did not address a need or circumstance?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
3.1	Review Ordinance to confirm all documents provide necessary required legal authority.	Once per 6-year SSMP Update Cycle	X		X
3.2	Confer with storm drain owners to ensure current practices and contact information are up to date.	Annually		X	X
3.3	Monitor and Document occasions when ordinance(s) failed to address issues as intended.	Continuously	X	X	X

RESILIENCE

Resilience is addressed for Element 3 by:

- Keeping abreast of industry trends and local ordinances that may affect operations.

APPENDIX 3 INCLUSIONS:

- None

4. Operation and Maintenance Program

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

4.1. Updated Map of Sewer System

WDR REQUIREMENTS

Att. D-4 (pg. D-4)

"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."

COMPLIANCE

The Agency maintains both hard copies and electronic versions of its sewer collection system. Engineering and Construction Management maintain a library in its main headquarters in Chino, California, with all design and As-Built drawings. In addition, drawings are archived in electronic DWG, TIFF, and/or PDF formats.

The Agency also maintains a GIS of the entire collection system supported by the Agency's Business Information Services (BIS) department. This information is updated in real time via iPad/iPhone during manhole inspections and preventive cleaning maintenance in the field, while CCTV inspections are updated at minimum monthly but often daily via data download from the CCTV system to the GIS database. In addition to the Agency's shapefiles of the system, member agency (satellite) sewer agencies system shapefiles, parcel layers, and aerial layers are also incorporated and updated periodically with new information. All this information is readily accessible from any computer within the Agency's intranet and via iPad in the field.

The Agency does not own or operate any stormwater conveyance systems but collaborates with satellite agencies to import stormwater system data to the Agency's GIS mapping system.

Once capital or new development projects are completed, information obtained from the project specific as-built drawings is used to update the Agency's GIS. Information including installation date, pipe size, pipe material, manhole location, and any additional pertinent project information is included into GIS and used to update the Agency's wastewater collection system maps. Additionally, as pipelines are removed or abandoned, the information is archived in the GIS system.

Necessary revisions and/or updates to the GIS information that are identified by the maintenance crews while performing routine operation and maintenance activities are documented for incorporation into the Agency's GIS. Map updates are made on a continuous basis. Where discrepancies are identified by field crews during the routine maintenance inspections, field staff have the ability using electronic field tablets to flag issued of concern or errors in real-time and send to the collection system Supervisor who reviews requests and forwards necessary changes required to the Agency' GIS unit to update (need estimated timeframe for updates…and refine this language in this section; we also suggest writing and implementing a formal SOP for this so we can mention here in document).

Upon request, the Agency will provide State and Regional Water Board staff a link to sewer system maps.

EFFECTIVENESS

Key Performance Indicators:

- Were all map updates completed in a timely manner?
- Are all staff trained in the procedure for providing map update information?
- Are newly installed sewer assets incorporated into the system maps?
- Are there terrain features or assets that should be incorporated in future map updates (e.g. exposed pipe, siphons, ARVs, surface water, etc.)

No	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
4.1.1	Review map update procedures with all affected staff.	Annually		X	X
4.1.2	Review/ensure all newly installed facilities have been updated and included in the system maps	Annually		X	X

4.2. Preventive Operation and Maintenance Activities

WDR REQUIREMENTS

Att. D-4 (pgs. D-4/D-5)

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

COMPLIANCE

The Agency's staff uses a Computerized Maintenance Management System (CMMS) and Enterprise Asset Management software from SAP® (implemented in 2007) for tracking its maintenance program activities and generating work orders, including tracking all customer complaints (i.e. foul odor, missing manholes, possible spills, etc.).

The SAP system tracks all required inspection and maintenance activities within the collection system to help proactively prevent blockages/operational problems or spills. The Agency utilizes SAP to be proactive and make informed decisions by using the collected data from field work orders and inspections.

SAP maintains historical data for all maintenance activities and provides a basis for critical analysis and data-driven planning and decision-making today and into the future. This allows for prioritizing and planning routine activities such as CCTV inspections, manhole inspections, pipe repair, and pipe cleaning. In addition, SAP software is used to plan and schedule higher-frequency inspection and maintenance activities such as Hot Spot cleaning and root control activities. Emergency and other reactive activities are documented in work orders as well.

The Agency Engineering Department maintains the GIS data that facilitates management of O&M activities, expedites data management and retrieval for scheduling, tracking, reporting, and mapping purposes. Additionally, GIS allows the Agency to implement an asset management program to facilitate planning and funding for CIPs.

The scheduling system allows staff to put certain activities on a preventive schedule where the CMMS automatically generates work orders on a prescribed interval. Work orders for other activities are generated by supervisory personnel on an as-needed basis.

EFFECTIVENESS

Key Performance Indicators:

- Is the agency maintenance, operations, engineering work orders periodically audited for accuracy and completeness?
- Does the agency monitor "open," "overdue," or "not yet completed" work orders to ensure completion of tasks?
- Are inspection and maintenance activities reducing the number and volume of spills?
- Is maintenance work being completed as scheduled?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
4.2.1	Monitor “Past Due” work orders to ensure critical work is being completed	Quarterly			X
4.2.2	Review scheduled PMs to ensure the prescribed schedule remains appropriate.	Annually			X

4.3. Training

WDR REQUIREMENTS

Att. D-4 (pg. D-5)

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.*

COMPLIANCE

The Agency's comprehensive training program covers several areas involving or associated with wastewater collection systems and serves to develop and maintain highly qualified, knowledgeable, and capable staff. This training is provided through a variety of modes (self-study, seminars, conferences, on-the-job, etc.) and begins from the first day on the job and continues regularly thereafter.

Staff involved in responding to service calls, including sewage spills, receive annual training in collaboration with upstream member (satellite) sewer agencies on spill emergency response procedures. This training is part classroom and part hands-on exercises and drills for responding to spill events and includes containment, restoring flow, spill volume, volume recovered, and spill start time estimations, clean up and completing the spill event data collection forms. Annual bypass pumping training is performed utilizing the Agency's onsite training facility.

Staff designated as Data Submitters are trained on the Agency's procedures for reporting spills from receipt of call to draft report submittals and certification.

The Agency has developed spill response procedures for Contract Service personnel who perform work for the Agency are required to:

- Immediately notify the Agency of any sewage spill they encounter.
- Make attempts to contain the spill
- Cordon off the area to keep the public safe
- Remain onsite until Agency staff arrives and relieves them.

This language is included in service agreements and discussed during pre-job meetings.

Other specific agency trainings for its staff include the following:

- Isle Group trainings (a membership-based subscription paid for by the Agency to learn online with a network of agencies worldwide with reviewing sewer technologies, equipment, testing, and obtain shared experiences and feedback from agencies in the network).
- Ongoing industry trainings and conferences for staying abreast of latest sewer equipment/system operational technologies, strategies and practices.

EFFECTIVENESS

Key Performance Indicators:

- Has all training been completed as scheduled?
- Have records of training and attendance been documented and maintained?
- Have all staff demonstrated ability and knowledge after each training event?
- Have contractors received, at a minimum, Direction for reporting and responding to spills.

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
4.3.1	Review training documentation to ensure all staff have received required training	Quarterly		X	X
4.3.2	Review agreements with contractors and/or Pre-Job meeting minutes to ensure contract personnel have received instruction for responding to sewage spills	Each Contract		X	X

4.4. Equipment Inventory

WDR REQUIREMENTS

Att. D-4 (pg. D-5)

An inventory of sewer system equipment, including the identification of critical replacement and spare parts.

COMPLIANCE

The Agency maintains an inventory of vehicles and sanitary sewer repair and replacement parts that are maintained in various locations throughout the system. The inventory of vehicles includes the vehicle type currently utilized to perform the necessary operation and maintenance activities of the Agency's wastewater collection system. Vehicles and replacement parts are made readily accessible to maintenance staff. The replacement parts maintained consist of parts necessary for specific types of repairs performed by maintenance staff. Additionally, the Agency maintains a resource list of contractors and vendors who stock materials and are available for emergency and short notice deliveries. The inventory of repair and replacement parts includes a summary of part size and type and a description and application of its use. The materials and parts inventories have been integrated into the Agency's CMMS (SAPs) software.

The Agency has critical equipment/parts in stock at its warehouse at RP-1 and RP-4. Table 13 below lists on-hand pipe and manhole cleaning/inspection equipment, safety gear (e.g. confined space equipment), and traffic control equipment.

Equipment Inventory	
Confined Space Equipment	**Quantity**
Trailer (dual axle)	
Air cart/Tanks/hoses/ Hip Pak's/ etc.:	
• SCOTT mobile air carts (2 people per cart)	2
• DOT bottles (9000psi)	5
• Scott Air-Pak (SCBA /air cart bottle-4500psi)	5
• SKA-PAK (SAR Hip air unit with regulator)	4
• SKA-PAK (Hip air bottle-4500psi)	4
• ELSA Emergency Escape-Pak (3000psi)	
• High psi hoses (4500psi)	
• Low psi hoses (50'/each-breathing psi)	
• SCBA units	2
• Full face masks for SCBA, SAR (assigned to each individual)	7
• Radio Com (intrinsic for masks)	2
Electric Ventilation blower with hose & saddle vent	
Gas Techs	
• XT Gas Detectors	4
• QA Gas Detectors	2
• RKI G3R PRO Gas Detectors	2
• RKI Gas Detectors	6

Equipment Inventory	
Rescue/Fall-Restraint/Retrieval Equipment	**Quantity**
Full body safety harnesses	10
Safety ropes (approx. 175')	
'Shock-wave II' safety lanyards	2
Locking carabineers (8")	2
Anchor straps (6', 3')	2
DBI SALA Tripod	
DBI Davit arms and 1 hitch stabilizer	2
DBI 'SALALIFT' Winches	2
DBI 'SALALIFT' Anti-lock fall restraint	
Portable Gantry	1
• Rhino Pull 1000 Winch	
• REID Gantry Rapide	
• Reid Trolley #1	
• Reid Trolley #2	
• Reid Sheared Trolley	
• Reid Trap Plate #1	
• Reid Trap Plate #2	
Lighting	**Quantity**
Rechargeable area work lights	3
Explosion Proof Drop-Light	
Rechargeable flashlights (1-intrinsic)	5
Portable rechargeable light stand	
Handheld spotlights	2
Portable rechargeable tower light	4
PPE	**Quantity**
Chest waders	2
Disposable protective 'Tyvek' suits and nitrile gloves	
PVC steel toe rubber boots (assigned to each individual)	
Milwaukee Helmet W/Light	3
Misc	**Quantity**
Potable 'Honda' generator (2k watt)	
5-ton chain come-along	
10' E-Z Ups'	2
AED and 1st-aid kit	
Line Cleaning Equipment	**Quantity**
'Gap-Vax' combo trucks equipped with 27" PD blowers, 90 gpm 3000psi H2O pumps, approx. 800' jetter hose on reel, 10-yard debris tanks, 1500-gallon freshwater tanks, 42' of 10" aluminum vacuum tubes, complete set of jet heads	3

Equipment Inventory	
of various sizes/types (tier II/III), chain flail cutter head, extendable pole grabbers, debris hooks, shovels, debris baskets, etc.	
Types of Nozzles	**Quantity**
• Spinner Heads	
• High Efficiency Nozzles	
• Sandbuster	
• Penetrator Nozzles	
Water Truck (approx. 2500gallon capacity)	
Misc. 1 1/2", 2 1/2" fire hoses with assorted fittings and nozzles	
Tubes/Hoses/Misc. Equipment	**Quantity**
126' assorted vacuum tubes for combo trucks (spare)	126'
'Soil-Surgeon' hydro excavating tubes	2
10'x10" rubber hoses with cam-lock ends	7
Disposable corrugated poly-prop. vacuum hose	150'
Portable aluminum truck ramps for dumping into bins	
Spare whip hoses'	6
Spare Tiger-tails	
Pipe/Manhole Assessment Equipment	**Quantity**
CCTV truck fully equipped with: P	3
• crawlers with cameras for various sized pipelines	
• extra camera unit	
• push camera	
• GPS unit	
• metal detector	
• locator unit	
• misc. tools	
Pipe Ranger	
Mudmaster	
Ultrashorty transporters	
Trimble GPS unit for GIS etc.	
Traffic Control Equipment	**Quantity**
Ford F250s with arrow board, light bar, 'hide-away' strobe lights, complete set of traffic signs, cones, and misc. tools	2
F-150 lightning	1
5yd Dump Truck	1
Needs	**Quantity**
Inflatable Plugs	2
Manhole Inspection camera equipment	
Additional SSO Level Sensors (SmartCover)	

Equipment Inventory	
Electro Pipe SCAN Equipment or alternative inspection technology	
6-inch towable pump	
2-inch, 3-inch, 4-inch portable trash pumps	
New traffic control trucks	
Large truck with increased towing capacity/Spill response vehicle	
Easement machine	
Message board	

Table 7 - Agency Equipment Inventory

As shown in Table 8, additional needs and other new technologies are being evaluated. Those include SSO advanced warning devices (e.g. level and flow sensors), zoom pole cameras, and hydro nozzle camera quick clean inspections. In addition, the Agency retains contractors that are available for any emergency repairs. The Agency also has an agreement in place with all the member (satellite sewer) agencies which provides the sharing of resources, equipment, and personnel in the event of spill emergencies. The Agency maintains a small supply of spare parts and utilizes its Spill Emergency Response Plan (SERP, Attachment 11 for ensuring full compliance with the SERP inventory of system equipment, including identification of critical replacement and spare parts.

EFFECTIVENESS

Key Performance Indicators:

- Have inventory lists been audited as scheduled?
- Have any inventory deficiencies or omissions been discovered and rectified?
- Has the agency experienced any equipment failure that inhibited a spill response?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
4.4.1	Audit inventory lists to ensure stock is adequate	Annually			X
4.4.2	Check with vendors to ensure critical parts lead times are as expected.	Annually		X	X
4.2.3	Ensure contracts with emergency support services are current	Annually		X	X

RESILIENCE

Resilience is addressed for Element 4 by:

- Developing an SOP for updating maps when errors are discovered.
- Developing and using forms (paper or electronic) for data collection to help ensure all pertinent information is consistently collected.
- Periodically evaluating inspection cycle intervals to help ensure they are optimized.

- Requiring staff to demonstrate ability and/or knowledge for all training activities.
- Monitoring equipment and critical spare parts usage for and trends.
- Performing periodic audits of the Vehicle and Equipment Inventory List.

APPENDIX 4 INCLUSIONS:

- 4.1 Annual Training List

Specifications 5.19 (O/M)

WDR REQUIREMENTS

Spec. 5.19 (pg. 27)

To prevent discharges to the environment, the Enrollee shall maintain in good working order, and operate as designed, any facility or treatment and control system designed to contain sewage and convey it to a treatment plant.

COMPLIANCE

Individual Agency preventive maintenance work programs are described below.

The Agency has a very effective preventive maintenance program for the sewer system to ensure continuous and safe conveyance of wastewater, resulting in a reduced frequency, number, and volume of spills. The Agency's preventive maintenance program has evolved into a very proactive program that is designed to locate, identify, and address problems that may exist in the collection system prior to the occurrence of a failure in the system. It is efficient by establishing, where possible, standard cleaning cycles in predetermined geographic areas. The prioritization and scheduling of the Agency's preventive maintenance program is supported with SAP software (a GIS-based maintenance program) to electronically store, track, and manage all collection system operations and maintenance activities. Maintenance history, asset information, service call data, cleaning schedules, and CCTV inspection data are all housed and managed in this software.

The Agency has well-established work programs that include preventative maintenance (PM), corrective maintenance (CM), and emergency maintenance (EM). These processes are outlined in a flow chart presented in Figure 8 below.

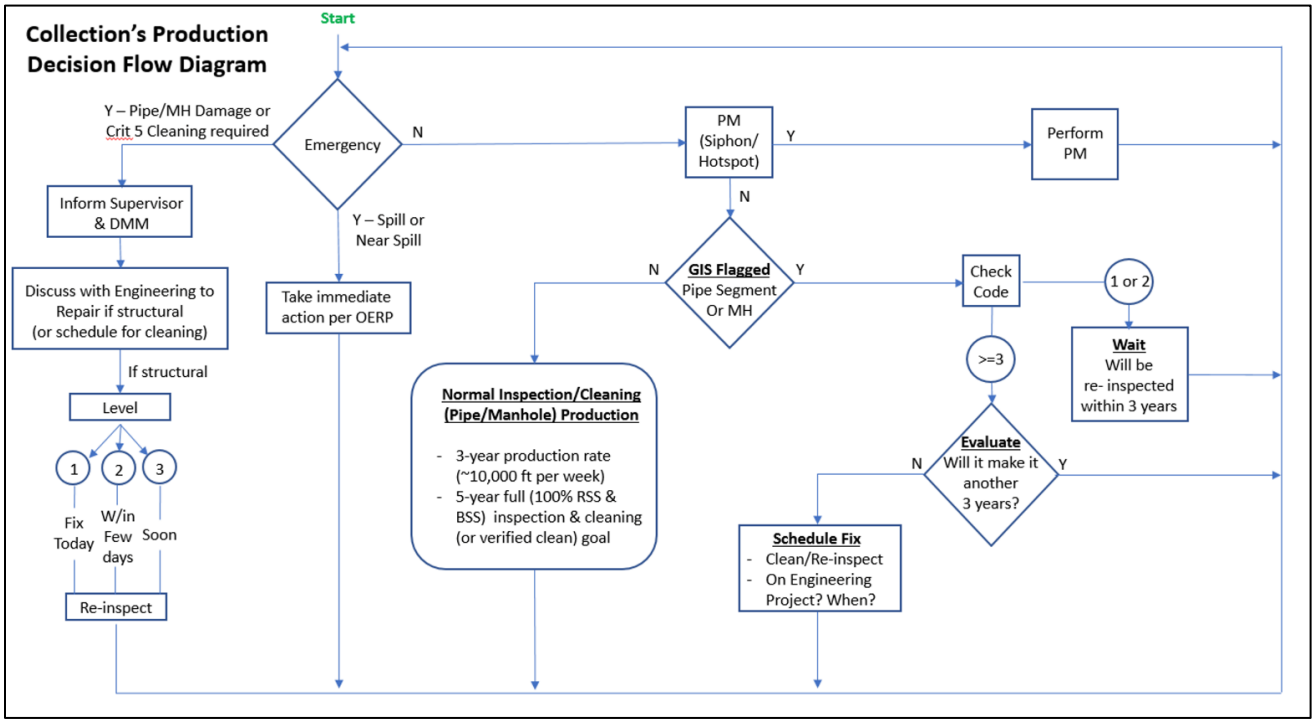


Figure 8 - Collection's Production Decision Flow Diagram

a. Gravity Pipeline Cleaning:

The Agency established a 60-month target (5 years) for cleaning the entire gravity sewer system, with more frequent focused cleanings in specific areas scheduled more frequently (monthly, quarterly, and annually), all tracked in SAP software.

b. High Frequency (Hot Spot) Maintenance:

The Agency has identified several high frequency maintenance locations within the collection which are identified as "Hot Spots." The preventative maintenance program includes pipeline cleaning all hot spots on a regularly scheduled basis (scheduled 1, 3, 6, month intervals) including gravity pipelines, sewer gravity siphons and areas identified as having excessive amounts of grease accumulation and/or root concentrations.

c. Pump Station Maintenance:

The inspection and maintenance program in place for pump stations include

- RP-1: Rounds at Montclair and Philadelphia Lift Stations occur three times per week, data collected is stored in the electronic logbook, all corrective and preventative maintenance history is stored in SAP's Computerized Maintenance Management System.
- RP-4: Rounds at San Bernardino Lift Station occur three times per week, data collected is stored in the electronic logbook, all corrective and preventative maintenance history is stored in SAP's Computerized Maintenance Management System.
- RP-5: Rounds at Preserve Lift Station occur daily, data collected is stored in the electronic logbook, all corrective and preventative maintenance history is stored in SAP's Computerized Maintenance Management System.

d. CCTV Inspections

CCTV System inspections of the Agency's sewer gravity mains are completed by rating condition of pipeline segments utilizing NASSCO PACP prevailing industry standard rating system. CCTV field operators The motorized main line cameras have a complement of tracks, wheel types and sizes to allow it to traverse through pipe of varying slope, conditions, material types, and pipe sizes.

e. Manhole Inspections

Manholes are routinely inspected by the inspection crews as the inspection of the pipelines is performed. The manholes are inspected as the covers are removed for CCTV inspection or cleaning access. All manholes are inspected on an ongoing basis as lines are cleaned and inspected and field crews update manhole inspections. Periodically lists of manholes overdue for inspection are generated to ensure inspections are done at recommended intervals (between 1-5 years depending on condition). Manholes identified as needing repairs are placed on an annual recurring project to be addressed. IEUA is currently developing a stand-alone manhole project in addition to recurring annual projects to catch up on backlog of manholes needing repair. Manholes that have not been located are placed on projects as needed and if not critical to access or on an abandoned system they are given lower priority which explains the small number of manholes labeled as not verified/located in the system.

f. Service Call Procedures

The Agency office is open all regular business hour service calls are typically received by the administrative staff or the Operations office. If received by the administrative staff, the call is referred Directly to the. All after hour calls are automatically routed to the on-call field operations staff is available 24 hours a day during their on-call period. A response time goal for the Agency is to provide a response within 30 minutes for service calls during work hours and within 60 minutes for service calls made after hours.

Agency service trucks are adequately equipped to manage lower lateral blockages. These trucks also have spill containment devices to prevent minor spills from entering a storm drain inlet or channel. Should the situation require larger equipment and staffing, the on-call person would contact a secondary on-call staff, and any additional staff as needed. The additional staff would obtain the required equipment from the Agency yard prior to travelling to the emergency site. Documentation of each callout request is recorded in CMMS and assigned a work order.

Should the service call involve a Category I spill, the Manager of Compliance would be contacted to make the necessary notifications to California Office of Emergency Services (CalEMA - OES). For response procedures reference the Sewer Backup and Sewer Overflow Response Guide shown in Section VI - Overflow Emergency Response Plan. Some additional River Watch Agreement requirements are also shown in this same Guide.

g. Sewer Rehabilitation and Repairs

Urgent Repairs: Upon discovery of an emergency during routine preventive O&M (i.e. NASSCO coded critical 5 pipe/manhole damage or cleaning required), Agency field staff will contact the Collection System Supervisor act. If the critical 5 is due to an O&M issue (e.g. root, grease, debris, etc.), the Supervisor will schedule a cleaning/re-inspection as appropriate. However, if it is a structural issue (e.g. pipe offset, break, or other excessive damage), the Supervisor will report to the Deputy Manager who will contact Engineering. Engineering will evaluate the emergency as a Level 1, 2, or 3, which establishes the following repair precedence:

- Level 1: Immediately repair (i.e. that day)
- Level 2: Repair within the next few days
- Level 3: Repair within the next week or two

The Agency Engineering staff will then contact their emergency contractors (refer to Figure 7, section 2.28) to initiate the repair. Once the restoration is completed, the Collection's staff will re-inspect to ensure the problem was properly corrected.

Non-Urgent Repairs: The GIS database is reviewed by the Collection and Engineering Supervisors on a continuous basis to assess and prioritize non-urgent repairs based on critical ranking and conditions assessment.

In addition to the above procedures, the Agency is in the process of conducting a third-party condition assessment of its entire collection system. The last of this type of valuation was performed in 2006. Among the deliverables will be an updated long-term CIP, which will also be utilized to update the TYCIP. For additional information, refer to section 8.23 concerning short and long-term CIPs.

h. System Monitoring

The Agency has purchased and utilizes 28 individual installed "SmartCover" electronic flow level sensors (25 units measuring levels only and 3 measuring hydrogen sulfide (H2S) gas level concentrations) and located near siphons and hot spot locations for the continuous real-time monitoring of all wastewater levels in manholes in these locations.

5. Design and Performance Provisions

5.1. Updated Design Criteria/Construction Standards/Specifications

WDR REQUIREMENTS

Att. D-1.1 (pg. D-5)

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 Agency as specified in section 8 (System Evaluation, Agency Assurance and Capital Improvements) of this Attachment, the procedures must include component-specific evaluation of the design criteria.

COMPLIANCE

a. Design and Construction Standards

Requirements for the design and construction of new, rehabilitated, and replaced sewer system facilities, including main, tie-ins, service laterals, cleanout, manholes, and other system appurtenances, are necessary to ensure the proper operation of the sewer system.

Pump stations and force mains for future projects are sized based on the standards in the industry as defined by the American Society of Civil Engineers and the American Water Works Association. The Agency has Engineering Design Guidelines which also guides internal staff as well as consultants through the design of all sewer infrastructure. The Agency oversees the design and performance of its Regional and Non-Reclaimable sewer systems' construction following these guidelines as well as the Agency's own standards for manholes and connections. For all other standards, the Agency adheres to the *Standard Specifications for Public Works Construction,* commonly known as the "*GREENBOOK*" standards.

The Agency has an Engineering department with resources to design a system so that it will perform as intended. The staff is composed of various engineering disciplines to tackle even the most difficult of designs. AutoCAD® is the standard drawing format. In addition, all bid proposals must also adhere to the *"GREENBOOK"* standards.

b. Standards for Installation, Rehabilitation and Repair

The Agency has an Engineering and Construction Management department with resources to make sure every project is built to code as designed and follows the testing and inspection standards in the *"GREENBOOK"* standards. The staff consists of various disciplines to ensure a project is built as designed. For pipeline rehabilitation and repairs, this is accomplished by requiring CCTV inspection and assessment before accepting and commissioning a project.

EFFECTIVENESS

Key Performance Indicators:

- Is plan checking QA/QC processes helping to ensure adherence to the standards?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
5.1.1	Ensure all project plans are approved in accordance with the Agency's Standard Specifications and Details.	Each Project		X	
5.1.2	Verify design standards and hydraulic model previously completed are adequate and consistent with current standards of practice.	2025		X	

5.2. Procedures and Standards

WDR REQUIREMENTS

Att. D-1.1 (pg. D-5)

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

COMPLIANCE

Standards for Inspection and Testing of New and Rehabilitated Facilities

EFFECTIVENESS

Key Performance Indicators:

- Were any design or installation deficiencies found during warranty inspections?
- Are deviations from standard procedures and/or specs, testing, etc., justified and documented?
- Does the Agency stay abreast of industry design standards and technical advances in the industry?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
5.2.1	Verify inspection procedures are adequate and consistent with current standards of practice	2017 (10-year cycle)			X
5.2.2	Verify design standards and hydraulic model previously completed are adequate and consistent with current standards of practice.	2017 (10-year cycle)			X

RESILIENCE

Resilience is addressed for Element 5 by:

- 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.

APPENDIX 5 INCLUSIONS:

- None

6. Spill Emergency Response Plan

WDR REQUIREMENTS

Att. D-1.1 (pg. D-6)

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:

- *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 assessments of spill response activities;*
- *Document and report spill events as required in this General Order; and*
- *Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.*

COMPLIANCE

The Agency's Spill Emergency Response Plan (SERP) is a stand-alone document that contains all the key elements necessary for an appropriate Spill response: notification, emergency incident response, reporting, and impact mitigation. The current plan, prepared by Fischer Compliance, LLC, meets the requirements of the State Water Resources Control Board's reissued Waste Discharge Requirements (Order WQ-2022-0103-DWQ), which became effective on June 5, 2023. Initial training has been provided to affected staff and refresher training is conducted annually including upstream member (satellite) sewer agencies A copy of the SERP is available for viewing at the Agency office upon request.

EFFECTIVENESS

Key Performance Indicators:

- Have staff spill response efforts helped to prevent the discharge of sewage to surface waters?
- Do post-spill assessments indicate staff are following the procedures outlined in the SERP?
- Is SERP training effective and trainees demonstrating adequate knowledge and abilities?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
6.1	Perform SERP training including practice drills.	Annually			X
6.2	Review Post Spill Assessments to ensure adherence and to indemnify any trends that should be addressed	Annually	X		X

RESILIENCE

Resilience is addressed for Element 6 by:

- Multiple staff are trained to respond to spill events
- Post-spill assessments are conducted to evaluate staff adherence to the SERP and to identify areas for improvement.
- Data collection forms direct staff to collect all the required data to be submitted to CIWQS and are designed as a guide to a proper spill event response.
- The Agency employees several different spill volume estimation methods to account for different circumstances.

APPENDIX 6 INCLUSIONS:

- 6.1 Spill Emergency Response Plan (SERP)
- 6.2 List of Outside Contractors

7. Sewer Pipe Blockage Program

WDR REQUIREMENTS

Att. D-7 (pg. D-7)

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:

a. An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances;

c. A plan and schedule for the disposal of pipe-blocking substances generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of substances generated within a sanitary sewer system service area;
d. The legal authority to prohibit discharges to the system and identify measures to prevent spills and blockages.
e. 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;
f. 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;
g. An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and
h. Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above.

COMPLIANCE

The WDR requirements above are addressed in order below:

As each upstream member (satellite) sewer agency has developed their own individual FOG control programs tailored specifically to address their individual City needs, including permitting and inspection of commercial and industrial dischargers as well as enforcement and public education and outreach programs, the Agency has determined at this time that a formalized FOG Control Program is not needed. Additionally, a review of historical spill data revealed only one FOG-related spill in the Agency's sewer system from over 10 years ago (12/7/2007), further justifying the position of not requiring a formal FOG Control Program for the Agency system. The Agency does have an Ordinance in place prohibiting excessive FOG discharges from upstream connections and does implement hot spot cleanings in areas prone to FOG buildup such as in sewer siphons and certain pipeline sections in the system with minimal slope.

a. Public Education and Outreach

   The agency maintains a presence at community events and actively participates with member agencies to promote FOG control programs. One outreach is public education, which is accomplished through distribution of FOG literature including information on proper disposal of FOG. The literature addresses both commercial sources such as restaurants and residential sources as well. In many sanitary sewer collection systems Fats, Oils, and Grease (FOG) is known to be a significant cause, and or contributor, of sewer blockages in pipe and the cause of operational disruptions and damage to sewage pump stations.

Although service areas that include commercial and institutional food service establishments (FSEs) are obvious sources of FOG, residential communities, especially those of medium and high-density multi-family residences, can also be a significant source of FOG. It is the purpose of the Regional FOG Control Program to ensure all customers in our service area are following the Agency Ordinance, and state and federal requirements, to prevent sewage overflows caused by FOG related blockages in our sewer collection system.

b. Disposal of Pipe-Blocking Substances

Disposal of daily FOG solids and liquids collected from the system are properly disposed of in drying beds at Agency treatment facilities. Contracted services are also utilized for hauling and disposal of solids as needed.

c. Legal Authority to Prohibit Discharges

Ordinance 97 and Ordinance No. 99 (Section 2) and Ordinance No. 106 (Article 2) have language that prevents/limits FOG discharges into the Agency's sewer system. The Agency also relies on its upstream member (satellite) sewer agencies to implement this requirement.

d. Requirements to Install Grease Removal Devices

Ordinance No. 106 Section 506 requires the installation of gravity separation interceptors and Section 508 requires Interceptor Maintenance requirements. The Agency also relies on its upstream member (satellite) sewer agencies to implement this requirement.

e. Authority to Inspect Grease Producing Facilities

Ordinance No. 99 (Section 7.3) requires inspection and sampling allowances for Agency personnel. The Agency also relies on its upstream member (satellite) sewer agencies to implement this requirement.

f. Identification of FOG in Collection System

The Agency relies on its upstream member (satellite) sewer agencies to address this requirement.

g. Implementation of Source Control Measures

The Agency relies on its upstream member (satellite) sewer agencies to address this requirement.

EFFECTIVENESS

Key Performance Indicators:

- 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?
- Have there been spills due to excessive fats, oil, grease, roots, or non-dispersible wipes discovered in the sewer system during the audit period?
- Are there repeat offenders among FSEs?
- Are enforcement trends decreasing?
- Are Source Control and Collection staff included in the plan check process?

IMPLEMENTATION PLAN/SCHEDULE

No	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
7.1	Review/evaluate enforcement and inspection findings and implement changes as necessary.	Annually		X	X
7.2	Review spill rates and causes and make changes to maintenance programs, as necessary.	Annually		X	X

RESILIENCE

Resilience is addressed for Element 7 by:

- Inspection of select assets Directly downstream of grease producing businesses to ensure source control is effective.
- Residential FOG outreach and education program.
- Performance of regular assessments of system assets to monitor performance.
- QA/QA process for evaluating pipe cleaning effectiveness.
- Daily disposal of pipe blocking materials retrieved during maintenance activities.

APPENDIX 7 INCLUSIONS:

- None

8. System Evaluation, Capacity Assurance, Capital Improvements

WDR REQUIREMENTS

Att. D-8 (pgs. D-7/D-8)

The Plan must include procedures and activities for:

- *Routine evaluation and assessment of system conditions.*
- *Agency assessment and design criteria.*
- *Prioritization of corrective actions; and*
- *A capital improvement plan.*

8.1. System Evaluation and Condition Assessment

WDR REQUIREMENTS

Att. D-8 (pgs. D-7/D-8)

a. *Evaluate the sanitary sewer system assets utilizing the best practices and technologies available.*
b. *Identify and justify the amount (percentage) of its system for its condition to be assessed each year.*
c. *Prioritize the condition assessment of system areas that:*
    - *Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies.*
    - *Are located 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.*
d. *Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods.*
e. *Utilize observations/evidence of system conditions that may contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State.*
f. *Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities; and*
g. *Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to: (a) sea level rise, (b) flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; (c) wildfires; and (4) increased power disruptions.*

COMPLIANCE

The above requirements are addressed in order below:

a. Evaluate the sanitary sewer system assets utilizing the best practices and technologies available.

The Agency maintains a GIS of the entire collection system in SAP software supported by the Agency's Business Information Services (BIS) department. This information is updated in real time via iPad/iPhone during manhole inspections and preventive cleaning maintenance in the field, while CCTV inspections are updated monthly via data download from the CCTV system to the GIS database. In addition to the Agency's shapefiles of the system, member agency (satellite) sewer agencies system shapefiles, parcel layers, and aerial layers are also incorporated and updated periodically with new information. All this information is readily accessible from any computer within the Agency's intranet and via iPad/iPhone in the field.

The assessment of a collection system involves every component of the Agency collection system, including pipelines, manholes, and siphons. The assessment of pipeline condition is a top priority of the Agency. It is utilized to regularly perform pipeline condition assessments to evaluate/monitor conditions over time. The condition rating of pipelines are key parameters used in prioritizing risk and used for development of the Agency CIP.

The Agency implements some of the latest CCTV camera technologies. The Agency also utilizes 28 "SmartCover" electronic flow level sensors (25 units measuring levels only and 3 measuring hydrogen sulfide (H2S) gas level concentrations) installed near hot spot locations for the continuous real-time monitoring of all wastewater levels in manholes.

b. Identify and justify the amount (percentage) of its system for its condition to be assessed each year.

The Agency has determined, based on its established historical system performance, limiting spills and optimizing system operations to a proper pipeline inspection frequency of 5-years. Prioritize the condition assessment of system areas that:

- Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, Agency issues, or other system deficiencies.
- Are located 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.

c. Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods.

The Agency prioritizes CCTV inspections with an established goal of inspecting the collection system every 5 years. There are some areas that are challenging to inspect in-house; however, these areas have been addressed, or plans are in place to address them. For example, the siphons were recently inspected as part of a project, and the anticipated plan is to schedule inspections for these siphons on a 10–15-year cycle. This inspection was completed in 2021/22 as part of the Total Asset Management Plan (TAMP) and Sewer System Management and Operations Plan (SSMOP), which has been uploaded.

Remaining areas that are difficult to inspect have been identified, and projects are underway to address these challenges. Additionally, the Agency's Asset Management team is working on developing alternative inspection methods, such as sonar or floating camera technology, to cover these areas.

The Agency also employs SmartCovers (28 total, including 3 for H2S monitoring and 25 for level monitoring) to provide advanced warning and continuous monitoring, particularly upstream of siphons or other

identified hot spot areas. A pole camera is also used for quick spot inspections. All inspection and cleaning activities are documented and tracked within the Geographic Information System (GIS). When inspections and cleaning are performed, timelines are assigned to each asset, indicating when it will need attention again.

CCTV inspections follow NASSCO coding standards, and manhole inspections are based on the assigned rating, with reinspection scheduled within a 1–5-year range. Currently, the Agency only performs level 1 surface manhole inspections. However, alternative technologies or services are being explored to conduct level 2 inspections in the future. Several projects are already in place to address manhole-related issues, and the standard detail has been switched to composite-style covers to help reduce infiltration and inflow (I&I) and mitigate odor issues.

The Agency's sewer collection system inspections utilize state-of-the-art color CCTV cameras, which are paired with software for video capture, fault observations, annotations, and pipe plots in accordance with NASSCO standards. Collection staff perform a preliminary field assessment during pipe and manhole inspections. GPS units are also employed to collect information about manholes and pipelines. A specially designed truck houses all the necessary equipment and appurtenances for CCTV inspections.

CCTV data is locally stored and transferred to the Agency's main server, with the information saved to digital media such as USB flash drives or DVDs for easy access and archiving.

Hot spots and siphons are placed on accelerated inspection and cleaning schedules (monthly, quarterly, semi-annually) to minimize the risk of spill events (see Figure 10 below). These schedules are adjusted based on ongoing analysis findings. Activities may be modified by altering work content, adjusting inspection intervals, or adjusting schedules to accommodate adverse conditions. Work order closeout procedures ensure that all work history is documented, and condition assessments are maintained for accurate record-keeping.

As part of the preventive maintenance (PM) process, observations of grease build-up in the sewer collection system are reported to Source Control, which is responsible for investigating the cause of the identified grease issues.

BSS (14 Siphons)										
Line	Segment	System	Description	City	Frequency	Cleaning Month	Traffic	Length ft	Barrels	Total ft
~~NSNT~~	~~033-034~~	~~BSS~~	~~8th st~~	~~Rancho~~	~~Monthly~~	~~Every~~	~~N~~	~~159~~	~~2~~	~~318~~
NSNT	055-056	BSS	Inland Empire	Ontario	Monthly	Every	N	184	2	368
NSCT	059-060	BSS	Holt & 10 fwy	Ontario	Monthly	Every	N	273	2	546
VNTL	010-011	BSS	Jurupa	Ontario	Semi-annual	Jan & July	N	147	3	441
EISL	019-019A	BSS	Jurupa & Etiwanda	Ontario	Semi-annual	Jan & July	Y	194	3	582
IEBL	006A-006B	BSS	Pacific Elbow Co.	Chino	Semi-annual	Jan & July	N	51	5	255
~~IEBL~~	~~010A-010B~~	~~BSS~~	~~Central & Prado~~	~~Chino~~	~~Semi-annual~~	~~Jan & July~~	~~N~~	~~197~~	~~2~~	~~394~~
NSST	077-088	BSS	Marlay	Fontana	Semi-annual	Jan & July	Y	330	2	660
NSST	137-138	BSS	Turner	Ontario	Semi-annual	Jan & July	Y	128	2	256
NSST	148-149	BSS	RP-1	Ontario	Semi-annual	Jan & July	Y	199	2	398
SBAN	007-008	BSS	CSI	Fontana	Semi-annual	Jan & July	Y	303	2	606
PTXC	001-002	BSS	Paradise Textile	Chino	Semi-annual	Jan & July	Y	124	1	124
NSST	091-162	BSS	Philadelphia Line	Fontana	Semi-annual	Jan & July	Y	31,633	1	31633
NSNT	005-006	BSS	Day Creek Wash	Rancho	Annual	January	N	254	1	254
NSNT	013-014	BSS	Under Milliken	Rancho	Annual	January	N	187	1	187
NSNT	019B-019C	BSS	Under Haven	Rancho	Annual	January	N	194	1	194
NSNT	022-023	BSS	Deer Creek	Rancho	Annual	January	N		1	
RSS (28 Siphons)										
WI	049-050	RSS	Fabtech	Chino	Monthly	Every	N	155	2	310
WI	057-058	RSS	Ramona	Chino	Monthly	Every	Y	100	2	200
RDT	015-016	RSS	Riverside Dr	Chino	Monthly	Every	Y	130	2	260
GMT	006-007	RSS	CCWRF back gate Glen Mead	Chino	Monthly	Every	N	165	2	330
FT	018-019	RSS	Freeway Trunk Wash	Ontario	Monthly	Every	N	180	2	360
CAT	005-006	RSS	Chino Ave & 71 FWY	Chino	Monthly	Every	Y	220	2	440
CHT	014-015	RSS	Carbon	Chino	Monthly	Every	N	540	2	1080
WIR	027-028	RSS	East End under 60 fwy	Chino	Quarterly	Jan, April, July, Oct	Y	100	1	100
WIR	072-073	RSS	Ramona & Railroad	Chino	Quarterly	Jan, April, July, Oct	Y	140	2	280
CHT	008-009	RSS	Lucille's	Chino	Quarterly	Jan, April, July, Oct	Y	40	1	40
CI	009-010	RSS	Central Ave in park lot	Chino	Quarterly	Jan, April, July, Oct	N	85	2	170
LST	003-004	RSS	High School	Chino	Quarterly	Jan, April, July, Oct	N	115	2	230
LST	008-010	RSS	Prado Rd	Chino	Quarterly	Jan, April, July, Oct	N	675	2	1350
FI	011-012	RSS	Live Oak	Fontana	Quarterly	Jan, April, July, Oct	Y	165	2	330
FI	042-043	RSS	Marlay	Fontana	Quarterly	Jan, April, July, Oct	Y	240	2	480
WIR	091-092	RSS	Outside CCWRF	Chino	Semi-annual	Jan & July	Y	75	1	75
ET	014-015	RSS	Ilex	Fontana	Semi-annual	Jan & July	Y	115	2	230
CUI	031A-031B	RSS	Whispering Lakes	Ontario	Semi-annual	Jan & July	N	90	2	180
GAO	065-066	RSS	Eli Basin & Philadelphia	Ontario	Annual	January	N	130	2	260
CUIR	061-062	RSS	Oropak	Ontario	Annual	January	N	195	2	390
CUIR	065-066	RSS	RP-1 Access Rd	Ontario	Annual	January	N	360	2	720
CUIR	067-068	RSS	RP-1 Access Rd	Ontario	Annual	January	N	285	2	570
FIR	039-040	RSS	Jurupa	Fontana	Annual	January	Y	260	2	520
FIR	064-065	RSS	15 FWY Basin	Ontario	Annual	January	N	200	2	400
UIR3	021-022	RSS	Grove & Mission	Ontario	Annual	January	Y	255	1	255
UIR3	030-031	RSS	Mission Under Wash	Ontario	Annual	January	Y	185	1	185
ETS	020-021	RSS	Cino Ave X Cucsamonga Creek	Ontario	Annual	January	Y	425	1	425
ETS	064-066	RSS	Remington X Cucamonga Creek	Ontario	Annual	January	N	438	1	438

Figure 9 - Hot Spots and Sewer Siphon Data

d. Potential Climate Change Impacts

The Agency has evaluated its service area and has determined that flooding is one potential climate change impact that may affect the sewer system. However, the Agency has determined it is not aware of any sewer pipes vulnerable to effects from external erosion. To address flooding, the Agency has implemented the following control measures:

- Worked collaboratively with the City of Chino to construct a new pump station with elevated key electrical equipment (need picture if you have to show) based on a 150-year flood protection design standard.

The following additional measures are in place for added system resilience against spills:

- Dedicated onsite backup generators at all sewage pump stations.
- Dual force mains in place for the San Bernardino Lift Station (the largest pump station in the system)

EFFECTIVENESS

Key Performance Indicators:

- Has the Agency maintained its schedule for and is data being reviewed in a timely manner?
  - CCTV Gravity Mains
  - Laterals
  - Manholes
  - Pump Stations
- Are inspection efforts discovering deficiencies in a timely manner?
- Are maintenance and inspection activities being properly documented?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
8.1.1	Review/evaluate enforcement and inspection findings and implement changes as necessary.	Annually		X	X
8.1.2	Review spill rates and causes and make changes to maintenance programs, as necessary.	Annually		X	X
8.1.3	Hold meeting to discuss any issues that may result from climate changes	Annually	X	X	X

8.2. Agency Assessment and Design Criteria

WDR REQUIREMENTS

Att. D-8 (pgs. D-7/D-8)

The Plan must include procedures to identify system components that are experiencing or contributing to spills caused by hydraulic deficiency and/or limited Agency, including procedures to identify the appropriate hydraulic Agency of key system elements for:

- *Dry-weather peak flow conditions that cause or contributes to spill events;*
- *The appropriate design storm(s) or wet weather events that causes or contributes to spill events.*
- *The Agency of key system components; and*
- *Identify the major sources that contribute to the peak flows associated with sewer spills.*

The Agency assessment must consider:

- *Data from existing system condition assessments, system inspections, system audits, spill history, and other available information.*
- *Agency of flood-prone systems subject to increased infiltration and inflow, under normal local and regional storm conditions.*
- *Agency of systems subject to increased infiltration and inflow due to larger and/or higher-intensity storm events as a result of climate change.*
- *Increases of erosive forces in canyons and streams near underground and above-ground system components due to larger and/or higher-intensity storm events;*
- *Agency of major system elements to accommodate dry weather peak flow conditions, and updated design storm and wet weather events; and*
- *Necessary redundancy in pumping and storage capacities.*

COMPLIANCE

The 2015 Wastewater Facilities Master Plan (WFMP) updated the hydraulic model of the collection system and evaluated the existing conveyance system to determine the ability to convey current and future flows. The hydraulic model indicated the Montclair Pipeline may be at capacity. As a result, a supplemental investigation was conducted. New flow monitoring data was collected then entered into the model and the updated model indicated the existing capacity is sufficient. Another result of the WFMP was that four flow diversion alternatives were developed to optimize recharge groundwater opportunities in the north, and it was determined that Whispering Lakes and Haven Pump Station could be used to divert flows from RP-5 to RP-1. These two alternatives are under investigation but will require collaboration with the pump station owners.

Influent wastewater flows were projected to increase at each of the four Regional Water Recycling facilities, primarily because of population growth. However, CIP projects were developed based on each expansion needs until 2035. Refer to the Capacity Enhancement Measure section below.

The Agency has identified a list of specific system repairs for improving conveyance capacity/maintainability (see table in Appendix 8.1).

EFFECTIVENESS

Key Performance Indicators:

- Number of Agency-related spills or surcharge condition during the audit period?
- Has the system responded to rain events as indicated by the hydraulic model?
- Has there been any changes to zoning designations (residential, commercial, industrial)?

IMPLEMENTATION PLAN/SCHEDULE

No	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
8.2.1	Monitor/Evaluate significant rain events to see if they exceed the design storm in the hydraulic model.	Each significant rain evet		X	X
8.2.2	Identify and monitor flood-prone areas susceptible to erosion from rain events	After each significant rain event		X	X
8.2.3	Monitor flows in each basin and update the hydraulic model	Per Engineering Department schedule			X

8.3. Prioritization of Corrective Action

WDR REQUIREMENTS

Att. D-8 (pgs. D-7/D-8)

The findings of the condition assessments and Agency assessments must be used to prioritize corrective actions. Prioritization must consider the severity of the consequences of potential spills.

COMPLIANCE

See Specifications 5.19 above for detailed descriptions of Agency urgent/non-urgent repairs including prioritizations.

EFFECTIVENESS

Key Performance Indicators:

- Has the Agency adhered to its system evaluation/condition assessment schedule?
- Has the Agency adhered to its prioritization/corrective procedures for sewer repair and Agency improvement projects?
- Have projects been completed before deficiencies caused failures?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
8.3.1	Utilize all available data for prioritizing corrective actions considering severity and consequences of potential spills.	Each CIP Update		X	X
8.3.2	Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities.	Continuously		X	X

8.4. Capital Improvement Plan

WDR REQUIREMENTS

Att. D-8 (pgs. D-7/D-8)

The capital improvement plan must include the following items:

a. *Project schedules include completion dates for all portions of the capital improvement program.*
b. *Internal and external project funding sources for each project; and*
c. *Joint coordination between operation and maintenance staff, and engineering staff/consultants during planning, design, and construction of capital improvement projects; and Interagency coordination with other impacted utility agencies.*

COMPLIANCE

The Agency has a wastewater collection system CIP covering both short and long-term projects necessary to correct identified system deficiencies. A comprehensive list of all identified Capital Improvement Program (CIP) projects, including projected costs, for the Agency's existing collection system was developed based on the results of the capacity analysis and condition assessment (see Appendix 8.1 for details). Additional data is maintained in an ARC-GIS dashboard viewer with project maps available on request.

The Agency is not aware of exfiltration from their collection system and has identified sewage conveyance facilities near surface waters. Pipeline routes are walked (list frequency) where staff monitor for defects. Significant inspection findings from CCTV are addressed in a timely manner (list more here specifically if you have case studies what the typical turn-around times are for Grade 4/5 defects near surface waters if you have it).

The Agency has extensive collaboration/coordination in place with regular meetings between its Engineering and Operations Departments who meet on a monthly basis to review current projects.

EFFECTIVENESS

Key Performance Indicators:

- Has the agency's capital improvement plan schedule been adhered to?
- Have there been any instances when a failure or service disruption occurred that would have been prevented if a project had been completed?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng.	CS
8.4.1	Hold regular coordination meetings, with all parties, to help keep the projects on track and resolve issues that may arise in a timely manner.	Annually		X	X
8.4.2	For schedules that are not kept, justify and document the reason	Each Delayed Project		X	X

RESILIENCE

Resilience is addressed for Element 7 by:

- Is there an annual review of the Capital Improvement Plan by all appropriate individuals including both Engineering and Operations?

APPENDIX 8 INCLUSIONS

- 8.1 Capital Improvement Plan

9. Monitoring, Measurement, and Program Modifications

WDR REQUIREMENTS

Att. D-9 (pg. D-9)

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

a. *Maintaining relevant information, including audit findings, to establish and prioritize appropriate SSMP activities.*
b. *Monitoring the implementation and measuring the effectiveness of each element.*
c. *Assessing the success of the preventive operation and maintenance activities.*
d. *Updating SSMP procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and*
e. *Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes.*

COMPLIANCE

The above requirements are addressed in order below.

a. The Agency maintains accurate and relevant inspection and maintenance records for the collection system. Much of the documentation today is maintained electronically, which allows for ease of access and analysis. This helps Agency staff to make sound decisions and prioritize activities when dealing with the routine and the unexpected.
b. Monitoring of the Agency's SSMP focuses on each element in terms of its implementation and effectiveness. Monitoring the implementation of SSMP elements would achieve the following goals:

    - Stated objectives of each element are valid and achievable
    - Tasks cited in each element leads to reaching these objectives
    - Tasks are being implemented
    - Responsibility for implementation is identified

    By establishing specific performance indicators for each element, an assessment can be made to determine the degree of success achieved. The SSMP has been designed to include key performance indicators (KPIs) for each element, which are used to measure effectiveness.

c. The Agency Assesses the success of maintenance and operation activities by ensuing activities are being performed as expected, monitoring actual outcomes compared to intended outcomes, as well as monitoring spill trends.
d. The Agency is committed to continuous improvement and monitors and evaluates performance of work programs and SSMP elements to ensure intended outcomes are achieved while looking for areas for improvement.
e. The Agency monitors spill trends, at a minimum every during required audits, utilizing the CMMS database, inspection records and CIWQS data. These resources are helpful in planning and programing work, and adjusting as needed, enabling the Agency to be adaptive and capitalize on lessons learned.

EFFECTIVENESS

Key Performance Indicators:

- Are SSMP Elements being periodically evaluated for effectiveness?
- Are work activities and spill events being documented?
- Has a plan and schedule been established to address audit findings/deficiencies from the last audit?
- Is Trend Analysis being performed on spill causes?
- Have work programs been assessed and updated as necessary?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
9.1	Assess work programs to ensure outcomes are as intended	Annually		X	X
9.2	Ensure updates to work programs and the SSMP based on assessments.	As Needed	X		X
9.3	Monitor and evaluate spill trends. Document efforts.	Annually	X		X

RESILIENCE

Resilience is addressed for Element 9 by:

- Development of key performance indicators to measure effectiveness of the Sewer System Management Plan.
- Performing periodic reviews of the Sewer System Management Plan to help ensure the plan is being properly implemented.
- Developing and adhering to a timeline to correct deficiencies found during the audit process.
- Periodically evaluating work programs to help ensure effectiveness.

APPENDIX 9 INCLUSIONS:

- 9.1 System Performance Monitoring Dashboards

10. Internal Audits

WDR REQUIREMENTS

Att. D-10 (pg. D-10)

The Agency SSMP 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.

COMPLIANCE

- The objective of the audit is to evaluate compliance, implementation and effectiveness of the SSMP.
- The SSMP includes a description of how the Agency will comply with the requirements of each Element. The audit review includes an evaluation to determine if compliance has been met.
- Implementation is evaluated by determining if the agency is executing the SSMP as stated.
- Effectiveness is evaluated by using key performance indicators, which have been developed specifically for each element.
- An additional evaluation is performed to comply with Specifications 5.6 addressing resilience. Resilience indicators have been developed for each element, and they serve to demonstrate how resilience is built into the SSMP and inspection, maintenance and spill response activities.
- Any deficiencies discovered through the audit process are noted and a plan and schedule to implement corrective measures are established.

EFFECTIVENESS

Key Performance Indicators:

- 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?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
10.1	Schedule audits in advance of due dates to ensure adequate time to complete. Agency has 6 months to complete the audit from the end of the audit period.	Begin end of audit period		X	X
10.2	Ensure a plan and schedule is developed to address deficiencies.	Once the Audit is completed		X	X

RESILIENCE

Resilience is addressed for Element 10 by:

- Periodically evaluate key performance indicators during the audit period to assess effectiveness and make corrections, if necessary, prior to the audit.
- Evaluate previous audit to ensure deficiencies have been rectified.
- Calendar the audit due dates and complete the audit on time.

APPENDIX 10 INCLUSIONS:

- 10.1 SSMP Audit

11. Communication Program

WDR REQUIREMENTS

Att. D-11 (pg. D-10)

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

a. *The public for:*

- *Spills and discharges resulting in closures of public areas, or that enter a source of drinking water, and*
- *The development, implementation, and update of its Plan, including opportunities for public input to Plan implementation and updates.*

b. *Owners/operators of systems that connect into the Enrollee's system, including satellite systems, for:*

- *System operation, maintenance, and capital improvement-related activities.*

COMPLIANCE

When the Agency experiences a spill, it is standard procedure to secure the affected area and keep the public away. This is generally done using barricades, cones and caution tape. Should the Agency experience a spill that may require closure of public areas or enter a source drinking of water, signs will be immediately placed indicating the issue and providing contact information. Staff will remain on site to provide an additional safety factor until appropriate authorities respond and direct otherwise. In all cases, the Agency will follow the advice of higher authorities, such as the local environmental health department and other regulatory authorities.

There are several opportunities for stakeholders and the public to participate and provide input into the development and update of the Agency SSMP. During its initial development stage, as with each SSMP Audit and update of the SSMP, the SSMP and related documents are presented to the Agency Board for review and acceptance. As previously noted, SSMP Audits are performed every three years and re-certification and acceptance of updated SSMPs are required every six years. In addition to the extensive initial development process, to date there have been five updates and re-certifications of the SSMP that have been presented to the Board. Prior to each Board Meeting, these documents are included in Board Agenda packet which are readily available for review on the Agency's website. The SSMP is posted on the Agency's website, which provides the public several ways to contact the Agency, via the "Contact Us" feature.

a. Mutual Aid Partnership

The Agency coordinates semi-annual collection's staff meetings, inviting all nine MA partners (Chino, Chino Hills, Fontana, the Agency, Jurupa, Montclair, Ontario, Rancho Cucamonga, and Upland). Each agency takes turns hosting these meetings - presenting spill lessons learned, regulation changes, current issues, new technology, etc. These events have been invaluable for networking and training. Additionally, semi-annual meetings, between the staff MA meetings, are held between Supervisors and Managers to share problems and solutions as they relate to better sewer collections O&M, as well as foster personal relationships. Each of these venues have led to improved interagency spill support. Regional Technical committee meetings are also periodically held to update members on recent spills, SSMP changes, and other relevant sewer collections information.

The Agency is involved in multiple community events such as the Agency's Earth Day, Touch-a-Truck, etc. These events help provide the public with information on how their sewer conveyance systems work, how

they are operated and maintained, what is safe and unsafe to put in sewer pipes and manholes, the FOG program, emergency response procedures, and contact data for information and feedback.

b. Public Notifications

The Agency prioritizes routine website enhancements. The site is fully updated and redesigned approximately every five years for efficiency and trend implementation.

Sewer system topics are currently communicated on the sewer system landing page, which features the SSMP/SSMP Audit Report, Collection Systems video, Emergency SSO information, and FOG and Wipes education materials. The Agency will continue to be fluid to incorporate any communication/outreach needed for future initiatives, resources, etc. The Agency is currently planning for its upcoming website revamp, which will take place within the next 12–24 months.

In addition to utilizing the Agency website, the Agency uses social media such as Facebook, Twitter/X, YouTube, Instagram, LinkedIn, and Nextdoor to inform the public of the various sewer system operations and outreach initiatives.

The Agency also publishes a biannual newsletter, E-Basin Update, which provides an opportunity to update subscribers on sewer system programs and functions.

An annual sewer report will be developed that can be viewed on the Agency's website and will be distributed to Sewer Collection Agencies and stakeholders. In addition, it will be posted on the Agency's social media channels.

EFFECTIVENESS

Key Performance Indicators:

- Does the agency place all Sewer System Management Plan action items on the agenda for regular counsel/board meetings?
- Does the agency have signage, or other means, readily available to notify the public of environmental or public risk factors related to a sewage spill?
- Does the agency perform outreach to residential customers?

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Env.	Eng	CS
11.1	Ensure the Board of directors approves the SSMP per schedule	Every 6 years	X		X
11.2	Ensure the SSMP is posted on the Agency Website and the link functions properly.	Annually	X		X
11.3	Ensure Sewage Spill Warning signs are readily available to communicate with the public when necessary	Annually			X

RESILIENCE

Resilience is addressed for Element 11 by:

- Use the Sewer System Management Plan as a tool to communicate to the public how the agency is managing the system.
- Maintain a consistent presence in the service area by attending community events or issuing periodic newsletters or other communications to the public.
- Make it clear and easy for the public to contact the agency.

APPENDIX 11 INCLUSIONS

- 11.1 Crisis Communications Plan

LIST OF APPENDICIES

APPENDIX 1

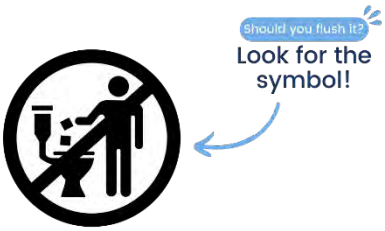
1.1. Project of the Year Description

Project/Program Description

The Inland Empire Utilities Agency began the *Be Sewer Smart* campaign during the COVID-19 pandemic due to a substantial increase in blockages incurred within our service area's sewer systems and within our Regional Water Recycling Plants. IEUA's Collections crew was able to determine that the cause of these blockages were due to an increase in fats, oils, and greases (FOG) disposed down the drain, as well as a substantial increase in non-flushable items. The pandemic caused many shortages in "essential" products; one of the most memorable being the scarcity of toilet paper. Many households were unable to purchase this item and were faced with the challenge of purchasing alternatives. This included an increase in "flushable" wipes purchased, while others resorted to using paper towels or tissues, among other things. Additionally, many residents increasingly found themselves at home during this time, in which home-cooked meals led to more FOG going down the drain.

The *Be Sewer Smart* campaign targets residents within IEUA's service area to increase awareness of proper disposal methods and relieve IEUA's Regional Water Recycling Plants and our customer agencies' sewer systems from blockages due to FOG, wipes, and other non-flushable items. This campaign aims to educate our residents to "Be Sewer Smart" and, in turn, assist with eliminating unwanted pollutants within our sewer systems. Throughout this campaign, we have aimed to educate our residents on what can and cannot go down their drains and toilets through examples of the expensive and time-consuming destruction that these items give rise to in our sewer systems.

Methods, Budget, Materials, and Development & Implementation



Marketing through social media is an excellent communication method as our message is able to reach our target audience as well as those outside of our service area. We have also utilized digital advertisements through local and regional newspapers and magazines, sponsored social media ads, and targeted email blasts.

This campaign has been developed completely in-house by IEUA's External Affairs department, with all graphics, ads, and narratives being completed by External Affairs staff, without the use of a consultant. The design of each campaign advertisement is unique, and staff includes eye-catching elements to capture the attention of the public in new ways to stand out from the other outreach and educational campaigns running simultaneously. The collateral developed for this campaign contains a combination of short videos, static graphics, and animated graphics.

As with many campaigns, social media has been the most effective tool utilized thus far out of all outreach methods. It continues to be one of the best ways to reach residents, allowing us to experience great success when leveraging our social media presence on Facebook, Instagram, X (formerly Twitter), and Nextdoor. Throughout this campaign, different hashtags have been utilized, including #FOG, #BeSewerSmart, #nowipesinthepipes, #noFOGdownthedrain, #lookforthesymbol, and #themoreyouknow.

Many of the short videos include upbeat music and positive/negative tones to reinforce the information displayed in each clip. While each ad requires staff to be innovative, educated on the topic, and artistic to varying degrees, each piece aims to ensure that viewers remain engaged in the message and actively involved in getting to know more about how to "Be Sewer Smart." While being fiscally creative, there is a significant cost savings to the Agency by forgoing the use of a consulting firm to complete the elements of this campaign, allowing staff the opportunity to learn more innovative methods and techniques for outreach and communication throughout the normal course of business, without additional staff training or costs incurred to the Agency.

One of the ways staff found benefit in keeping our campaign material interesting was working closely with our Collections team to develop videos and images that provide our residents with a true picture of what happens when FOG and wipes are disposed of incorrectly. We utilize videos and imagery in our ads that feature our team members out on the streets of our service area, giving residents a behind the scenes look at the labor involved with cleaning out sewer drains, showing what items are found, and any related issues that occur. Of course, to ensure the message is clear, we always reiterate the correct way to dispose of these items and what can be disposed down the drain.

Staff also recently had vehicle wraps installed on our Collections Vactor truck and CCTV van to reinforce the "Be Sewer Smart" message to residents in real time – whenever and wherever. Approximately $6,000 was spent on the development of custom vehicle wrap designs with an external consultant. The goal was to create two different eye-catching designs that were concise, effective, and consistent with IEUA's brand. Each vehicle highlights the proper disposal

of wipes and FOG and displays real images of staff and Agency facilities. The designs were carefully crafted and professionally installed for a seamless look.

We have also coordinated closely with our customer agencies to determine how our campaign can best assist them with the issues they are facing in their sewers. We coordinate closely on annual FOG lid giveaways for residents and provide them with up-to-date collateral for distribution amongst their social media channels or relevant platforms. The entire process requires a collaborative, unified regional effort to address the issue at hand.

One of the most invaluable features of this campaign and the collateral created is that it can be easily picked up, reworked to refresh the message, and utilized whenever IEUA or our customer agencies notice an uptick in the pollution of wipes and FOG within our region. The pictures, the images, and the message remain relevant and timeless.

Results

Our success can be seen in how well our social posts and email blasts are received. Our last email blast received an open rate of 26.3%, performing well above the average open rate of 8%. Our best performing Nextdoor poll received over 30,000 impressions. A total of 787 individuals voted, with 26% stating they didn't know that 'flushable' wipes aren't flushable and another 3% voting they now knew the proper disposal method.

The *Be Sewer Smart* campaign has helped our region learn about the damaging effects caused by the pollution of our sewers. Throughout this campaign, we have been able to provide residents with a firsthand look at the destruction that these items cause within our sewer systems and the damaging effect it can have on their homes. We have also educated residents on how to correctly dispose of these pollutants: for FOG, "collect it, cool it, and can it!" and wipes, "No Wipes in the Pipes," both of which reinforce the importance of taking the time to evaluate what is disposed down our toilets and sinks.

Video and photo links

- https://www.instagram.com/reel/CtYZfqdNwup/
- https://www.instagram.com/reel/Cydt73YN5Te/
- https://www.instagram.com/reel/Cz1VtQpOSYH/
- https://www.instagram.com/p/C3NpHAZLzUA/
- https://www.instagram.com/reel/CuKLgQhtmb4/
- https://www.instagram.com/p/C-3NBAMT1X7/?img_index=1
- https://www.instagram.com/p/C2IPrdUr7pk/?img_index=1
- https://www.instagram.com/reel/Cp2pSN0tKcR/

APPENDIX 4

4.1. Annual Training List

A	B	C	D	E

IEUA Sewer Collections Technical Training Topics 2025

Training Topics	Frequency	Date Completed	Scheduled	Trainer
IEUA SERP	Annual			
IEUA SSMP	Annual			
Impacted Surface Water Response Procedures	Annual			
SWRCB Employee Knowledge Expectations	Annual			
Water Quality Sampling Plan	Annual			
Employee Core Competency Evaluations of SSO	Annual			
CIWQS	Annual			
SSO Table Top	Annual			
Researching and Doc SSO Start Times	Annual			
SSO Volume Estimation Techniques	Annual			
SSO Drill	Annual			
NASSCO	Every 3 Years			
Collections SOP Training	Annual			
CWEA SARBS Collections Seminars	Semi-Annual			
Mutual Aid Meetings and Training Events	Semi-Annual			

IEUA Safety Training Topics 2025

Training Topics	Frequency	Date Completed	Due	Trainer
A-28 Ethics	Annual		11/15/23	IEUA
3661 - Heat Illness	Annual		11/15/23	IEUA
5125 - Hearing Conservation and Safety	Annual		11/15/23	IEUA
3609 - Respiratory Protection	Annual		11/15/23	IEUA
5121 - Bloodborne Pathogens	Annual		11/15/23	IEUA
A-11 Handling Cal OSHA	Annual		11/15/23	IEUA
AIM Hazard/ Incident Reporting	Annual		11/15/23	IEUA
3420 - Asbestos Awareness	Annual		11/15/23	IEUA
5123 - Using Fire Extinguishers Training	Annual		11/15/23	IEUA
A-65 Workplace Violence	Annual		11/15/23	IEUA
Confined Space	Annual		11/15/23	OSTS
CPR/First aid	Every 2 years		11/15/25	OSTS
HAZWOPER	Annual		11/15/23	OSTS
3488 - Hazardous Spills	Annual		11/15/23	IEUA
5136 - Lockout Tagout	Annual		11/15/23	IEUA
2743 - RCRA Hazard Waste	Annual		11/15/23	IEUA
3668 - Defensive Driving	Annual		11/15/23	IEUA
4288 - Fall Protection	Annual		11/15/23	IEUA
2745 - Hydrogen Sulfide	Annual		11/15/23	IEUA
3654 - Forklift Safety Pedestrian	Annual		11/15/23	IEUA
3639 - Ladder Safety	Annual		11/15/23	IEUA
A-65 Workplace Violence	Annual		11/15/23	IEUA
A-30 Harassment Prohibition	Annual		11/15/23	IEUA
A-63 Drug/Alcohol Free Workplace	Annual		11/15/23	IEUA
A-05 Security at Agency	Annual		11/15/23	IEUA
A-14 Vehicle Use Procedures	Annual		11/15/23	IEUA
AIM Hazardous Materials	Annual		11/15/23	IEUA
A-23 On-the-Job IIRP	Annual		11/15/23	IEUA
AIM IIPP Safety Manual	Annual		11/15/23	IEUA
2461 - PPE	Annual		11/15/23	IEUA
A-29 EEO	Annual		11/15/23	IEUA
4906 - Protecting Yourself Against COVID19	Annual		11/15/23	IEUA
5009 - Proper Use of Face Mask	Annual		11/15/23	IEUA
A-87 Vehicle On Board Diagnostic	Annual		11/15/23	IEUA
retaliation free workplace	Annual		11/15/23	IEUA
3603 - First Aid	Annual		11/16/23	IEUA
3664-Hazard Waste	Annual		11/17/23	IEUA
3428- Active Shooter	Annual		11/18/23	IEUA
3176- Emergency Prepardness	Annual		11/19/23	IEUA
3232-Office Ergonomics	Annual		11/20/23	IEUA

APPENDIX 6

6.1 Spill Emergency Response Plan (SERP)

6.2 List of Outside Contractors

SPILL EMERGENCY RESPONSE PLAN (SERP)

UPDATE (MAY 2023)

Inland Empire Utilities Agency
A MUNICIPAL WATER DISTRICT

SERP Review and Approved By	Name/Title	Signature/Date
Legally Responsible Official (1)		
Legally Responsible Official (2)		
Legally Responsible Official (3)		

ACTIVITY CHANGE LOG (SERP)		
Date	Responsible Person/Title	Description Activity/Change

PART 1 (COMPLIANCE GUIDE)

PART 2 (FIELD GUIDE)

LIST OF TABLES

LIST OF ATTACHMENTS

Introduction

This document, the Spill Emergency Response Plan (SERP), formerly known as the Overflow Emergency Response Plan (OERP) has been prepared by Fischer Compliance LLC with assistance from the Inland Empire Utilities Agency (IEUA) staff for complying with one of a series of updated regulatory requirements resulting from the State Water Resources Control Board 2022 adoption of the "reissued" Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems[1] (referred to as "the 2022 WDR" throughout this document."

One primary area of focus by the State Water Board through updated regulatory requirements in the 2022 WDR is *objective compliance* with effective implementation of elements of the IEUA's Sewer System Management Plan (SSMP). The State Water Board emphasizes urgency on the structure, content, and organization of an agency-specific SERP for ensuring effective spill, containment, control, and mitigation[2].

The effectiveness of the SERP is measured by the following objectives, providing IEUA-specific translation of the corresponding State Water Board expectations for required effective spill responses:

- Implement effective and proactive spill containment, control, and mitigation
- Comply with State Water Board guidance on SERP implementation (see Attachment 1.1)
- Reduce future IEUA WDR violations, potential water quality impacts, and nuisances
- Meet/exceed all WDR compliance points in a systematic, streamlined, and transparent manner to facilitate use by Legally Responsible Official(s), Managers, and field staff
- Measure and improve IEUA SERP effectiveness (see Attachment 2)
- Expedite review by Water Board compliance inspectors and prepare IEUA for future regulatory audits of the SERP

These objectives provide the cornerstone for PART 1 (COMPLIANCE GUIDE) of this document, formulated by Fischer Compliance LLC around a streamlined process for objectively reviewing each applicable SERP compliance point, presenting the method(s) for how IEUA is complying with each requirement, and providing customized Key Performance Indicators (KPIs) for IEUA SERP for measuring effectiveness. PART 2 of this document includes streamlined information and procedures for IEUA first responders and field operations staff.

Table 1 below provides a summary of applicable Spill Emergency Response Plan requirements for full compliance with the WDR.

[1] See Order No. 2022-0103-DWQ

[2] See Order No. 2022-0103-DWQ, Attachment D (page D-2) which states *"the State Water Board or a Regional Water Board may consider the Enrollee's efforts in implementing an effective Sewer System Management Plan to prevent, contain, control, and mitigate spills when considering Water Code section 13327 factors to determine necessary enforcement of this General Order."*

Table 1 - Summary of Applicable Spill Emergency Response Plan Requirements

Compliance Point	WDR Section	Page	Regulatory Requirements
1	Spec. 5.7	22	• Allocate necessary resources for spill responses
2-1	5.12	23	• Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023); certify SERP up to date in Annual Report)
2-2	5.12	24	• Targets and measures for protection of public health and environment
2-3	5.12	24	• Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
3	5.13	24	• Comply with Notification, Monitoring, Reporting, Recordkeeping requirements
4	ATT D-3	D-4	• Collaborate with storm drain agencies and ensure easement accessibility agreements for locations requiring operations
5-1	ATT D-4	D-5	• SERP training and practice drills
5-2	ATT D-4	D-4.4	• Inventory of sewer system equipment/identification of critical replacement and spare parts
6-1	ATT D-6	D-6	• Ensure Training/Implementation of SERP for staff and contractors
6-2	ATT D-6	D-6	• Address Emergency Operations/Traffic Control
6-3	ATT D-6	D-6	• Implement technologies, practices, equipment, coordination
6-4	ATT D-6	D-6	• Conduct Post-spill assessments
6-5	ATT D-6	D-6	• Annually review/assess effectiveness of SERP/update
see 2-1 above	ATT D-6	D-6	• Spill Emergency Response Plan/prompt detection/response
see 3 above	ATT D-6	D-6	• Notifications (primary responders, agencies)
see 3 above	ATT D-6	D-6	• Notifications (other potentially affected agencies)
see 3 above	ATT D-6	D-6	• Comply with WDR Att. E1 requirements
see 2-3 above	ATT D-6	D-6	• Containment, minimize/prevent spills to waters of state and drainage conveyances
see 2-2 above	ATT D-6	D-6	• Minimize public health and environmental impacts
see 2-2 above	ATT D-6	D-6	• Remove sewage from drain conveyance
see 2-2 above	ATT D-6	D-6	• Clean spill area/drain conveyance
see 4 above	ATT D-6	D-6	• Implement pre-planned coordination and collaboration with storm drain agencies
see 3 above	ATT D-6	D-6	• Document and report spill events

Compliance Evaluation

For preparing the SERP, an onsite compliance evaluation inspection was completed of the IEUA's existing spill prevention, containment, control, and mitigation effectiveness[3]. This included review of IEUA's existing Overflow Emergency Response Plan (OERP), spill prevention/reduction strategies, field practices, data collection approach, critical spare parts/inventory, and field staff training. In addition, the inspection included review of data in the State Water Board's "California Integrated Water Quality System" (CIWQS[4]) including agency spill response metrics and benchmarks (see Table 2 below for details).

Table 2 – IEUA spill data and compliance benchmarks

Element	Benchmarks
• Spill Response Metrics (agency notification - operator arrival)	0.88 hours (averaged, 2018-2023) 4.0 hours max (2018-2023)
• Notification Compliance (Category 1 spill notification to Cal-OES >2 hours)	1 violation (2018-2023)
• Draft Reporting Compliance (Category 1 spills within 3 business days)	0 violations (2018-2023)
• Spill Recovery (%) (2018-2023)	Cat 1=7% Cat 2= 39% Cat 3=36%

SERP Effectiveness

For facilitating review, assessment, and measurement of SERP effectiveness, Key Performance Indicators (KPIs) were generated for facilitating annual review, assessment, and update of the SERP for improving its effectiveness (see Attachment 2).

[3] See Order No. 2022-0101-DWQ, Provision 6.1.6 (Water Boards' considerations for discretionary enforcement purposes)
[4] CIWQS, publicly available at:
https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main

COMPLIANCE POINT #1

1-1 Regulatory Requirement

WDR Section	Summary of Requirements
Specif. 5.7 (p22)	• Allocate necessary resources for spill responses

1-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details on resources and implementation, see IEUA SSMP, Elements II (Organization), IV (O/M), and VI (Emergency Response Plan).

1-3 Effectiveness

- For further improving SSMP implementation and effectiveness, the IEUA has established 65% if its field staff holding CWEA collection system maintenance certifications[5].

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #1.

[5] California Water environmental Association (CWEA), https://www.cwea.org/certification/

COMPLIANCE POINT #2-1

2-1-1 Regulatory Requirements

WDR Sections	Summary of Requirements
• Specif. 5.12 (pgs23-24)	• Update and Implement SERP within 6 months of 2022 WDR adoption date (6/5/2023) • Certify the SERP up to date in the Annual Report
• ATT D-6 (pgD-6)	• Prompt detection and response to spills to reduce spill volumes and collection information for prevention of future spills. • Containment, minimize/prevent spills to waters of state and drainage conveyances

2-1-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- To enhance SERP effectiveness and early detection of potential spills, the IEUA has developed and is implementing Mutual Aid Agreements with its neighboring collection systems agencies throughout its regional service area. For additional proactive measures, IEUA purchased and has deployed individual electronic manhole level sensor monitors for proactive monitoring and alarms for high flows throughout the collection system.

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

2-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #2-1.

COMPLIANCE POINT #2-2

2-2-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Specif. 5.12 (p24)	• Targets for protection of public health and the environment
• ATT D-6 (pgD-6)	• Minimize public health and environmental impacts • Remove sewage from drain conveyance • Clean spill area/drain conveyance

2-2-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

2-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #2-2.

COMPLIANCE POINT #2-3

2-3-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Specif. 5.12 (p23-24)	• Timely spill responses, minimized impacts and nuisances by stopping, intercepting, recovering, cleaning publicly accessible areas, preventing toxic discharges to waters of the State
• ATT D-6 (pgD-6)	• Containment, minimize/prevent spills to waters of state and drainage conveyances

2-3-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

2-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, see Attachment 2, Compliance Point #2-3.

COMPLIANCE POINT #3

3-1 Regulatory Requirements

WDR Section	Summary of Requirements
• Spec. 5.13 (p24) • ATT D-6 (pD-6)	• Comply with Notification, Monitoring, Reporting, Recordkeeping requirements • Notifications (primary responders, agencies) • Notifications (other potentially affected agencies) • Comply with WDR Att. E1 requirements and document and report spill events

3-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- IEUA) contact information, 951-675-1131, is on their website https://www.ieua.org/everything-water/ssmp/. In addition, IEUA uses several social media sites to disseminate agency news and showcase its programs.

- IEUA receives calls for service in multiple ways, but mainly through public observation and notification. Administrative staff will answer calls for assistance during business hours, and a series of questions are asked of the caller to determine the potential problem. The Administrative staff forwards the call information and a service request to the Manager of Operations and Maintenance, who will dispatch staff for immediate response.

- After-hours emergency calls will use the same contact information for business hours, except the call is automatically forwarded to the On-Call Worker's cellular phone. The on-call worker will gather information for the call, then respond and asses the caller's concerns.

- IEUA monitors their wastewater lift stations through a supervisory control and data acquisition (SCADA) system. The SCADA system monitors the lift stations 24 hours a day, seven days a week. In addition, the SCADA system is programmed to send an alarm to notify IEUA staff when the station is not operating as intended or a high-level alarm is received.
- IEUA conducts extensive research for its spills for ensuring accurate volume estimations prior to the Legally Responsible Official (LRO) certifying spill reports in CIWQS. This includes an internal GIS report system completed for each spill event/debriefing (see agency files for examples and details).

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #3.

COMPLIANCE POINT #4

4-1 Regulatory Requirements

WDR Section	Summary of Requirements
• ATT D-3 (pD-4)	• Procedures: Collaborating with storm drain agencies
• ATT D-6 (pD-6)	• Implement pre-planned coordination and collaboration with storm drain agencies and other utilities/departments prior to, during and after a spill.

4-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- IEUA coordinates on an ongoing basis with stormwater agencies throughout its service area for pre-planned coordination/collaboration for spills.

- IEUA utilizes the following publicly-available resources for its assessment of spills and collaboration with outside agencies (wastewater, water, stormwater, etc): USGS mapping tool with watershed and topography information[6], California Board Basin Plan Beneficial Use Viewer tool,[7] and the State Water Board eWRIMS tool[8].

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #4).

[6] See https://apps.nationalmap.gov/viewer/
[7] See https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=116f7daa9c4d4103afda1257be82eb16
[8] See https://waterrightsmaps.waterboards.ca.gov/viewer/index.html?viewer=eWRIMS.eWRIMS_gvh#

COMPLIANCE POINT #5-1

5-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.3	• SERP training and practice drills

5-1-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP including review of internal response procedures, practice drills, skilled volume estimation, and CIWQS reporting.

- For ensuring compliance, IEUA is conducting SERP training covering the following subjects for field staff:
  - Water Quality Monitoring
  - Pump Station Emergency Response Training and Drills
  - Spill Overflow Emergency Response/Spill Estimation
  - Bypass pumping

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

5-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #5-1.

COMPLIANCE POINT #5-2

5-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-4.4	• Inventory of sewer system equipment/identification of critical replacement and spare parts

5-2-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance with an inventory of system equipment, including identification of critical replacement and spare parts.

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

5-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #5-2.

COMPLIANCE POINTS #6-1

6-1-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Ensure training/implementation of SERP for staff and contractors

6-1-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

6-1-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-1.

COMPLIANCE POINT #6-2

6-2-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Address Emergency Operations/Traffic Control

6-2-2 Compliance/Effectiveness

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional procedures, refer to the IEUA Spill Response Field Guide.

6-2-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-2.

COMPLIANCE POINT #6-3

6-3-1 Regulatory Requirement

Page #(s)	WDR Section	Summary of Requirements
Page D-5	ATT D-6	• Implement technologies, practices, equipment, coordination

6-3-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

6-3-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-3.

COMPLIANCE POINT #6-4

6-4-1 Regulatory Requirement

WDR Page #(s)	Section	Summary of Requirements
Page D-5	ATT D-6	• Conduct Post-spill assessments

6-4-2 Compliance

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- The IEUA has an extensive internal auditing procedures which includes generating a detailed Powerpoint presentation for every spill within 30 days of occurrence. The procedure also includes scheduling formal debriefings for each spill with IEUA upper management.

- For additional procedures, refer to the IEUA Spill Response Field Guide.

6-4-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-4.

COMPLIANCE POINT #6-5

6-5-1 Regulatory Requirement

WDR Page #(s)	Section	
Page D-5	ATT D-6	• Annually review/assess effectiveness of SERP/update

6-5-2 Compliance/Effectiveness

- The IEUA Manager of Facilities and Water Programs is responsible for ensuring full compliance through implementation, review, and training on the updated SERP.

- For additional details demonstrating compliance, refer to the IEUA Spill Response Field Guide.

6-5-3 Effectiveness

- For tracking ongoing operational performance metrics required for conducting its annual review/assessment of the SERP, IEUA utilizes Attachment 2, Compliance Point #6-5.

LIST OF ATTACHMENTS

(These attachments are designed for assisting agencies in complying with the Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems (Order No. 2022-0103-DWQ)

PART 2 (FIELD GUIDE)

LIST OF TABLES

1.0 RESPOND AND ASSESS

The response begins upon notification of the potential spill. The task sequence may vary depending on the circumstance(s) encountered, and the First Responder shall exercise the best judgment while responding to and mitigating the spill's effects. The first responder shall contact their supervisor for direction as appropriate. The First Responder's Goals are to:

- Prevent, Contain, Control, and Mitigate.
- Safely respond to the site as quickly as possible. IEUA's response goal to a reported spill is 1 hour.
- Thoroughly assess to determine the responsibility, if additional resources are needed, and the best course of action to control and mitigate the spill.
- Collect all required data and document on forms provided.

A. Upon Arrival:

   i. Document the "Arrival Time" on the Sewer Spill Response Field Report

   ii. Take a 10-second video of the spilling structure (if currently active)

   iii. Take photos of the affected area

B. Assess and Determine Responsibility. Is the problem within the IEUA owned/operated sewer system?
   i. Determine the source of the spill, the spill category and start internal notifications as appropriate. If the spill is a Category 1 or 2, immediately notify the supervisor.
   ii. Determine additional resources and personnel needed including potential mutual aid if necessary.
   iii. Attempt to contain or divert the spill. Block, plug, or cover all storm drain inlets in the immediate area to redirect the spill to a containment area. Use the storm drain map to assess the direction of the sewage flow on the ground and the potential destination to help determine additional containment needs.
   iv. Setup traffic control measures to keep pedestrians and pets away from the affected area(s)

C. Is the problem due to another agency's facility?
   i. Inform the customer the spill is not IEUA responsibility, and provide them with the responsible agency contact information.
   ii. Attempt to contain the spill and keep the public out of harm's way until the agency's personnel arrive.
   iii. Additionally, contact the agency and inform them of the problem, and offer Mutual Aid Assistance (see Table 3)

D. Is the problem due to a privately-owned facility?
   i. Advise the owner/manager to stop all water use in the building or facility.
   ii. Explain that the cause of the spill is in the portion that IEUA does not maintain or perform work on

iii. If the property owner/ manager is unwilling to address the cause of the spill, contact your Supervisor to discuss whether Code Enforcement or County Environmental Health should be notified
iv. In addition, the first responder should call their Supervisor and discuss or determine if IEUA will clear the blockage or recommend that the owner/manager call a plumbing service. If IEUA decides to clear the blockage, track your time and material for billing purposes.
v. If IEUA determines not to clear the blockage, assist with containment, if necessary, to prevent the spill from entering a DCS. Again, track your time and materials used for billing purposes.

E. Is there a backup in a home or building caused by a failure in an IEUA main?
   i. Once the blockage has been cleared, the first responder will call the Manager of Facilities and Water System Programs to inform them of the backup.
   ii. Recommend the customer keep children and pets out of any affected areas.
   iii. IEUA will support cleanup if the resident requests IEUA assistance. IEUA has contracts with the following contractor:
      i. SERVPRO of Chino 909-548-3191
      ii. SERVPRO of Northeast Ontario 909-390-0238
   iv. After explaining the concerns with sewer spills and contamination and offering clean-up services to the resident, if the resident refuses clean-up services from IEUA, politely ask them to sign the Declination of Cleaning Services form.
   v. Additionally, the resident/owner can decide to clean up the spill and file a claim with the IEUA.
F. Document activities and findings on the Spill Response Field Report

2.0 SPILL CATEGORIES

WDR General Order 2022-0103-DWQ Section 5.13.1

Individual spill notification, monitoring, and reporting must be in accordance with the following spill categories:

Category 1 - is any volume of sewage from or caused by a sanitary sewer system regulated under the General Order that results in a discharge to:

- A surface water, including a surface water body that contains no flow or volume;
- A drainage conveyance system that discharges to surface waters when the sewage is not fully captured and returned to the sewer system;
- Any spill volume not recovered is considered discharged to surface water unless the drainage conveyance system discharges to a dedicated stormwater infiltration basin or facility;
- A spill from an Agency owned and/or operated lateral that discharges to a surface water is a category 1 spill

Category 2 - is a spill of 1,000 gallons or greater from or caused by a sanitary sewer system regulated under this general Order that does not discharge to a surface water.

- A spill of 1,000 gallons out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 2 spill

Category 3 - is a spill of 50 gallons and less than 1,000 gallons from or caused by a sanitary sewer system regulated under this general Order that does not discharge to a surface water.

- A spill of 50 gallons and less than 1,000 gallons that spill out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 3 spill.

Category 4 - is a spill of less than 50 gallons from or caused by a sanitary sewer system regulated under this general Order that does not discharge to a surface water.

- A spill of less than 50 gallons that spills out of a lateral and is caused by a failure or blockage in the sanitary sewer system is a Category 4 spill.

3.0 CONTAIN AND MITIGATE

WDR General Order 2022-0103-DWQ Section 5.12 and Section D-6, 6.6 & 6.7

Containment of a spill is one of the primary ways to mitigate the effects of the spill. Immediately cover or plug storm drain inlets to divert sewer flow to the containment location. Containment of a spill becomes increasingly difficult once the overflow reaches a drainage conveyance system or a waterway. The quicker the source and extent of the spill can be determined, and the spill contained and/or controlled, the less the impact on the environment and public health. The first responder's decisions should be based on the best action to mitigate the spill's impacts and prevent discharge to surface waters.

Multiple techniques have been identified to contain the spill depending on the circumstances, spill category, and material available. Table 1 lists possible containment options for field crews in no particular order.

Table 1 - Containment Strategies

Location	Strategies for Containment
Curb & Gutter	Create a berm or dam using the following: • Rubber Berm • Dry Sweep • Dirt • Sandbags • Deploy Absorbent Bags
Open Space	• Hand-Dig a trench to contain the spill • Create Sandbag Dam • Create a berm to divert the sewage to a natural low point
Lift Station	• Vacuum retrieve from the wet well using Hydro-Vac • Establish Bypass Operations
Drainage Channel	• Create a Dam using sandbags or dirt • Use vacuum retrieval if accessible by hydro-vac
Strom Drain	• Block inlets using rubber mats and/or sandbags • Plug manhole outlets using pneumatic plugs or sandbags • Plug outfall manhole to prevent discharge into the environment

Location	Strategies for Containment
Backup In Building	• Attempt to remove cleanout caps to allow the sewage to discharge outside the building • Establish containment using the most effective method from above
Creeks/Streams (Low flow only)	• Create Sandbag Dams • Install a silt fence to contain floating solids • Contact the local health department or Fish and Wildlife for direction NOTE: Containment attempts should not negatively impact aquatic life

4.0 EMERGENCY SYSTEM OPERATIONS

WDR General Order 2022-0103-DWQ Section D-6, 6.5

IEUA first responders may need to set up temporary traffic control to protect the public's health and safety in the event of a street collapse or undermining of a roadway. In addition, temporary traffic control allows crews responding to safely contain and clear the blockage and prevent sewage from further dispersing by vehicular traffic. Multiple guides provide information on temporary traffic control, including the Cal Trans Work Area Traffic Control Handbook (WATCH), or the Manual on Uniform Traffic Control Devices (MUTCD). However, temporary traffic control shall be set up based on the agency's training guidelines. Finally, responding crews shall use temporary traffic control devices or barriers to divert the public from contact with the spill.

5.0 CORRECT CAUSE AND RESTORE FLOW

Correcting the cause and restoring flow depends on the type of IEUA infrastructure the spill is discharging from.

Mainline- If the blockage is in the main, it will be between a manhole with little to no flow and a manhole surcharging or spilling. Response crews should set up the hydro-vac or jetter truck on the dry manhole, downstream from the surcharged manhole, to clear the blockage and restore flow. Once the blockage has been relieved, monitor the mainline flow to ensure the blockage doesn't reoccur downstream. If it is difficult to remove the blockage, increase containment or initiate bypass pumping. Request additional assistance to CCTV inspect the line to assess the problem. If needed, contact your supervisor for assistance.

Sewer Lift Station- If the station is equipped with an alarm screen, check alarm status for indication of problem. If the station has no power, contact Southern California Edison to determine if they are aware of the outage, and a estimation of when service will be restored. Determine the retention time remaining in the wetwell and sewer system, bypass pumping may be necessary. If the first responder feels that a hydro-vac will sustain the flow coming into the station, mobilize one immediately. If power is present, but pumps are not operating, switch the HOA switch to hand. If the pumps start, monitor wetwell levels and control with the pump controls. If pumps will not operate in the hand position, mobilize additional staff for by-pass pumping of the station. Follow agency procedures for notification of Qualified Electrical Worker or Instrumentation & Control personnel.

Force Main – When responding to a broken force main, response personnel should immediately shut down the pumps at the lift station affecting the force main and apply lockout - tagout measures to ensure the pumps remain off. The first responder should establish the remaining storage in the wet well and collection system, then contact the necessary crews to repair the main, set up bypass pumping, or utilize vacuum trucks to control the wet well levels and prevent an additional spill from occurring.

6.0 SPILL SPECIFIC MONITORING

WDR General Order 2022-0103-DWQ Section D-6, 6.3 & E-1, 2.1

The enrollee shall visually assess the spill locations and spread using photography, a global positioning system (GPS), or other best available tools. In addition, a best practice would be to provide a sketch of the spill spread and dimensions specific to the spill. In the sketch, indicate the spill's final destination or containment point. The enrollee shall document the spill locations, including;

Photography and GPS coordinates for;

- The system location where the spill originated. If multiple spill appearance points exist, use the point closest to the spill origin;
- Include GPS coordinates for the spill destination or containment point if available

Photography for:

- Drainage conveyance system entry locations
- The locations of discharge to surface waters, if applicable
- The extent of the spread, and
- The location(s) of the spill clean up

7.0 INITIATE SPILL CLEANUP

WDR General Order 2022-0103-DWQ Section 5.12 & Section D-6, 6.9

Recovery and thorough cleanup are necessary for all sewer spills. When recovering spills, all solids and materials should be recovered and removed from the site, and every effort should be made to recover as much of the SSO as possible. Disinfection of contaminated soil or drainage ways is only performed when directed by San Bernardino County Environmental Health or the CA Department of Fish and Wildlife

Procedures for cleaning affected areas after a spill are as follows:

A. Back up in Building
   1. Once the blockage has been cleared, the first responder will call the Manager of Facilities and Water System Programs to inform them of the backup.
   2. Recommend the customer keep children and pets out of any affected areas.
   3. IEUA will support cleanup if the resident requests IEUA assistance. IEUA has contracts with the following contractor:
      i. SERVPRO of Chino 909-548-3191
      ii. SERVPRO of Northeast Ontario 909-390-0238

B. Street, Curb or Gutter or Hardscape
   i. Remove all debris and solids with broom, shovels and wash down water.
   ii. Before removing any contaminated soil and plants, photograph the area and speak to the property owner.
   iii. Wash pavement, curb and gutter area, with the high-pressure wand, then vacuum all wash water with a hydro-vac.

C. Open Area/ Landscape
   i. In an open area that is primarily dirt, response crews shall use either a hydro-vac vacuum nozzle, or dig and remove dirt until a dry layer is visible.
   ii. If the area is a grass landscaped area, flush the spill area with copious amounts of water and vacuum the area thoroughly.

8.0 REMOVE SEWAGE FROM DRAINAGE CONVEYANCE

WDR General Order 2022-0103-DWQ Section 5.12 & Section D-6, 6.8 & 6.9

Response crews shall remove all sewage that has entered the drainage conveyance system by vacuuming all water, debris, solids, and paper in the drainage conveyance system. Photographs must be taken to verify the conditions before and after cleaning activities. With containment still in place, flush the affected area with water to the containment location and vacuum water and debris. IEUA determines the condition of the storm drain pipe when deciding to hydro-jet. If the pipe condition has deteriorated to the point that damage to agency equipment may result, flushing to the containment point is the best option. Once thoroughly cleaned, remove the containment measures and flush and vacuum the remaining area, capturing all water and returning it to the sanitary sewer system.

9.0 REGULATORY NOTIFICATION

WDR General Order 2022-0103-DWQ Section D-6, 6.1 & 6.2

If a spill that discharged in or on the waters of the State or discharged to a location where it will probably be discharged to the waters of the State, IEUA shall notify the Office of Emergency Services (OES) and obtain a control number as soon as possible, but no later than 2 hours after becoming aware of the discharge; and notification can be provided without substantially impeding cleanup or emergency measures. Table 2-3 provides the internal and external contacts for IEUA to aid in regulatory notification and mutual aid.

Table 2 - Agency Contact Information

Group	Name/Title	Number	Notes
IEUA	Lucia Diaz Manager of Facilities and Water System Programs	909-342-2365	LRO
IEUA	Ken Tam Manager of Environmental Services Resources	909-993-1917	LRO
IEUA	Pietro Cambiaso Manager of Compliance and Sustainability	909-732-3397	LRO
IEUA	Warren Green Manager of Contracts and Procurement	909-993-1709	Insurance/Risk support
IEUA	Ed Makowski Collections System Supervisor	909-497-4934	STAFF
IEUA	Lucia Diaz Manager of Facilities and Water System Programs	909-342-2365	LRO

Table 3- Regulatory Agency Notification

Agency	Number	Notes
California Office of Emergency Services (OES)	(800) 852-7550	Obtain a control number and contact name
Regional Water Quality Control Board (RWQCB)	951-782-4130 RB8SpillReporting@waterboards.ca.gov	Leave a voicemail with date and time. Send follow up email.
San Bernardino County Environmental Health	800-782-4264 - Business Hours 800-472-2376 - After Hours	
California Department of Fish and Wildlife	909-484-0167 AskRegion6@wildlife.ca.gov	Guidance for Sensitive Riparian areas
Mutual Aid Contact number provided is the agency on-call number	Agency	Contact Information
	Cucamonga Valley Water District	909-987-2591
	City of Chino	909-628-1234 (Police Dispatch)
	City of Chino Hills	909-364-2860
	City of Fontana	909-721-8770
	City of Montclair	909-905-0410
	City of Ontario	909-721-7246
	City of Upland	909-296-0133
	Jurupa CSD	951-685-7434
	City of Pomona	909-772-4105

10.0 NOTIFICATION AND REPORTING

WDR General Order 2022-0103-DWQ Section D-6, 6.3

The notification requirements of this section apply to all spills resulting from a failure or blockage in the IEUA's owned and /or operated sanitary sewer system regulated under this Order. Table 4 aids field staff, data submitters, and the LRO(s) with the timeline requirements for notification of regulatory agencies and the submittal of draft and certified reports into CIWQS.

Table 4 - Monitoring and Reporting

Spill Category	OES Notification	Monitoring	Draft Report	Certified Report
Category 1 Any volume of sewer discharging to surface water	• Within 2 hours of the Agency's knowledge of the spill of 1,000 gallons or greater discharging or threatening to discharge to surface waters. • Obtain a Control number from OES	• Conduct spill-specific monitoring. • Conduct water quality sampling within 18 hours of knowledge of a spill 50,000 gallons or greater to surface waters	• Due within 3 business days of knowledge or self-discovery of Category 1 spill.	• Due within 15 calendar days of the spill end date. Upon completion, the CIWQS will issue final spill event ID number. • Submit Technical Report within 45 calendar days after the spill end date for spill greater than 50,000 gallons. • Submit the Amended Report within 90 calendar days after spill end date

Spill Category	OES Notification	Monitoring	Draft Report	Certified Report
Category 2 Spills of 1,000 gallons or greater that do not discharge to waters of the State	• Within 2 hours of the Agency's knowledge of the spill of 1,000 gallons or greater discharging or threatening to discharge to surface waters. • Obtain a Control number from OES	• Conduct spill-specific monitoring.	• Due within 3 business days of the Agency's knowledge of the spill	• Due within 15 calendar days of the spill end date. Upon completion, the CIWQS will issue final spill event ID number. • Submit Amended reports within 90 calendar days of Certified Report due date
Category 3 Spills of 50 gallons to less than 1,000 gallons that don't discharge to surface waters	• N/A	• Conduct spill-specific monitoring.	• N/A	• Due 30 calendar days after the end of the month in which the spills occurred. After LRO certifies the spill, CIWQS will issue a spill identification number for each spill. • Submit Amended reports within 90 calendar days of Certified Report due date

Spill Category	OES Notification	Monitoring	Draft Report	Certified Report
Category 4 Spills less than 50 gallons that don't discharge to surface waters	• N/A	• Conduct spill-specific monitoring.	• N/A	• Within 30 calendar days after the end of the month in which the spills occurred, certify monthly the volume spilled and the total number of spills. • Upload and certify a digital report of all Category 4 spills in CIWQS by 1 FEB after the end of the calendar year in which the spills occur.

11.0 RECEIVING WATER SAMPLING

WDR General Order 2022-0103-DWQ Section E-1, 2.3

For sewage spills in which an estimated 50,000 gallons or greater are discharged into a surface water, IEUA shall conduct water quality sampling no later than 18 hours after IEUA's knowledge of a potential discharge to a surface water. In addition, IEUA shall gather information during and after the spill event to assess the spill magnitude and update its notification and estimated spill volume. The water quality sampling results will enable the division to prioritize areas of concern regarding water quality impacts

A. **Receiving Water Monitoring**

Through visual observation, spill volume-estimating and field calculation techniques, IEUA shall gather and document the following information for spills discharging into receiving waters:

1. Estimated spill travel time to the receiving water
2. For spills entering a drainage system, estimated spill travel time from point of entry to the point of discharge into receiving water
3. Spill travel time can be estimated the following ways:
    i. Travel time based on design slope of 2 fps
    ii. Timed water release in cleaned pipe over the distance traveled
4. Estimated spill volume entering the receiving water
5. Photographs of the following:
    i. Waterbody bank erosion
    ii. Floating matter
    iii. Water surface sheen (potentially from oil and grease)
    iv. Discoloration of receiving water
    v. Impact to the receiving water

B. **Water Quality Sampling and Analysis**

Surface water samples will be collected using a grab sample technique. Employees are required to wear new sterile powder free surgical gloves when collecting all samples.

1. ***Trigger for Sampling*** -Water quality sampling is required within 18 hours of initial SPILL notification for Category 1 Spills in which 50,000 gallons or greater are spilled to surface waters.
2. ***Safety and Access***- Water quality sampling should only be performed if it is safe to do so, and access is not restricted or unsafe. Unsafe conditions include traffic, heavy rains, slippery or steep creek banks, visibility issues, high flowing creeks and limited access due to soil conditions or poor terrain. If access restrictions or unsafe conditions prevent compliance with these monitoring requirements the IEUA shall provide documentation of the access restriction or safety hazards in the required report.
3. ***Where to Sample***- The IEUA must use best professional judgement to determine the upstream and downstream distances based on receiving water flow, accessibility to

waterbody banks and size of visible plume. Collect one sample each day for the duration of the spill. The IEUA shall collect receiving water samples from the following locations.

i. A point in the drainage conveyance system before the flow discharges into the receiving water. Label this sample DCS-001

ii. Point of Discharge into the receiving water where sewage initially enters the receiving water. Label this sample RSW-001

iii. Upstream Sample – A point in the receiving water, upstream of the point of sewage discharge. Label this sample RSW-001U

iv. Downstream Sample – A point in the receiving water, downstream of the point of discharge where the spill is fully mixed with the receiving water. Label this sample RSW-001D

Determine the water velocity present in the creek or body of water during the spill. Dropping debris in the creek, and timing how long the debris takes to travel a known distance is a good indicator of the water velocity present. Use this information to determine the next downstream sampling point. Multiply the water velocity by the spill duration to figure the furthest point downstream to sample.

C. **Sampling Procedure**

1. Put on required PPE (safety glasses and latex gloves)
2. **Collect Drainage Conveyance System Sample** – Sample at a point in the drainage conveyance system before the flow discharges into receiving waters
   - **a.** Label this sample DCS-001 and take a picture of the location you are sampling.
   - **b.** Avoid any debris or scum layer from the drainage system.
   - **c.** Fill the bottle against the direction of flow, replace the cap and secure the sample to avoid contamination.
   - **d.** Use a thermometer to measure the temperature of the sample, and record the results
3. **Collect Upstream Sample** - Move approximately 100 feet upstream of the source.
   - **a.** Label the bottle RSW-001U and take a picture of the location you are sampling.
   - **b.** Sample away from the bank and avoid any debris or scum layer from the surface.
   - **c.** Fill the bottle against the direction of flow, replace the cap and secure the sample to avoid contamination.
   - **d.** Use a thermometer to measure the temperature of the upstream sample location and record the results.
4. **Collect Point of Discharge Sample-** Move approximately 10 feet downstream of the source location.
   - **a.** Label the bottle RSW-001 and take a picture of the location you are sampling.
   - **b.** Sample away from the bank and avoid any debris or scum layer from the surface.
   - **c.** Fill the bottle against the direction of flow, replace the cap and secure the sample to avoid contamination.
   - **d.** Use a thermometer to measure the temperature of the source sample location and record the results.

5. **Collect Downstream Sample –** Move approximately 100 feet downstream of the source.
   - **a.** Label this sample RSW-001D and take a picture of the location you are sampling.
   - **b.** Sample away from the bank and avoid any debris or scum layer from the surface.
   - **c.** Fill the bottle against the direction of flow, replace the cap and secure the sample to avoid contamination.
   - **d.** Use a thermometer to measure the temperature of the downstream sample 1, and record the results

D. **Required Water Quality Analyses** – All samples will be immediately transported to the nearest ELAP certified water quality laboratory for analysis. The sample analysis, at a minimum will include the following:

1. Ammonia
2. pH
3. Electrical Conductivity
4. Bacterial indicators, such as total and fecal coliform, enterococcus and e-coli, per the regional Basin Plan or as directed by SWRCB
5. Temperature

Laboratory Contacts:

Sushmitha Reddy, Manager of Laboratories, IEUA

or Western Analytical Laboratories

13744 Monte Vista Ave

Chino CA 91710

909-627-3628

E. **Equipment and Supplies** – The following items and PPE are required for sampling:

1. Cooler with Blue Ice
2. Sterile sampling bottles
3. Powder free latex gloves
4. Safety glasses
5. Marking pen
6. Field log forms

12.0 FINAL SPILL VOLUME ESTIMATION

WDR General Order 2022-0103-DWQ Section E-1, 2.3

The final spill volume estimation is critical for CIWQS reporting and determines whether additional reporting to regulatory agencies is required. Additionally, the Enrollee shall update its notification and reporting of estimated spill volume, including spill volume recovered, as further information is gathered

during and after a spill event. To assess the approximate spill magnitude and spread, the enrollee shall estimate the total spill volume using updated volume estimation techniques, calibration and documentation for CIWQS reporting. The Agency has trained on the following methods of volume estimation.

A. **Measured Area/Volume** - The volume of most small spills that have been contained can be estimated using this method. The shape, dimensions, and depth of the contained wastewater are needed. This information is used to calculate the area and volume of the spills. Measured volume is not an appropriate estimation matrix if the spill occurs during a rain event.
B. **Flow Estimation Charts –** Overflow volume can be estimated by multiplying the overflow duration by the overflow rate. The overflow rate can be determined by pick hole or vent hole spill height, flow meter data, SCADA information, and pump data from lift stations.
C. **Upstream Connections/EDU -** This method can be used for overflows from residential properties when enough information has been gathered through interviewing the resident. Be clear with your questions and explanation for the interview. Only interview residents from the household contributing to the spill.

13.0 DOCUMENTATION OF SPILL EVENTS

WDR General Order 2022-0103-DWQ SectionD-6, 6.13

Inland Empire Utility Agency shall maintain records for each of the following spill-related events and activities:

A. Spill event complaint, including but not limited to records documenting how the IEUA responded to notifications of spills. Each complaint record must, at a minimum, include the following information:
    a. Date, time, and method of notification,
    b. Date and time the complainant first noticed the spill, if available,
    c. Narrative description of the complaint, including any information the caller provided regarding whether the spill has reached surface waters or a drainage conveyance system, if available,
    d. Complainant's contact information, if available, and
    e. Final resolution of the complaint;
B. Records documenting the steps and/or remedial action(s) undertaken by IEUA, using all available information, to comply with this General Order, and previous General Order 2006-0003-DWQ as applicable;
C. Records documenting how estimate(s) of volume(s) and, if applicable, volume(s) of spill recovered were calculated;
D. All California Office of Emergency Services notification records, as applicable; and
E. Records, in accordance with the Monitoring Requirements in this Attachment.

(For additional references, please refer to SERP PART 1 (COMPLIANCE GUIDE).

Pre-Qualified Contractors for Consturction Projects under $2M

Category-Type	Firm Name
Concrete	Horizons Construction Co. Int'l Inc.
Electrical	Big Sky Electric, Inc.
Electrical	Davis Electric
Electrical	Diversified Thermal (Small Projects Only)
Electrical	Ferreira Construction
Electrical	Hampton Tedder
Electrical	Henkels & McCoy
Electrical	J.F. Shea Construction, Inc
Electrical	Leed Electric, Inc.
Electrical	Southern Contracting Company
Electrical	Kiewit Infrastructure West Co. (Emergency Projects Only)
Fire Protection	GSE Construction Co., Inc.
General Building	Allison Mechanical
General Building	Athena Engineering
General Building	Best Contracting Services, Inc.

Pre-Qualified Contractors for Consturction Projects under $2M

General Building	E.J. Meyer Company
General Building	F.M Thomas Air Conditioning
General Building	GSE Construction Co., Inc.
General Building	Horizons Construction Co. Int'l Inc.
General Building	Howard Ridley Co., Inc.
General Building	Innovative Construction Solutions
General Building	J.R. Filanc Construction Co., Inc.
General Building	Kingmen Construction Inc
General Building	Mladen Buntich Construction Co. Inc
General Building	Norstar
General Building	Pacific Hydrotech Corporation
General Building	PCL Construction, Inc.
General Building	Rite-way Roof Corp
General Building	Sancon Engineering
General Building	TE Roberts
General Building	United Mechanical Contractors

Pre-Qualified Contractors for Consturction Projects under $2M

General Building	W.A. Rasic Construction Co., Inc.
General Engineering	Arizona Pipeline
General Engineering	Best Contracting Services, Inc.
General Engineering	Big Sky Electric, Inc.
General Engineering	Charles King Company, Inc
General Engineering	E.J. Meyer Company
General Engineering	Ferreira Construction
General Engineering	Garney Pacific
General Engineering	GSE Construction Co., Inc.
General Engineering	Hampton Tedder
General Engineering	Hemet Manufacturing Co. dba Genesis Construction
General Engineering	Henkels & McCoy
General Engineering	Horizons Construction Co. Int'l Inc.
General Engineering	Howard Ridley Co., Inc.
General Engineering	Innovative Construction Solutions
General Engineering	J.F. Shea Construction, Inc
General Engineering	J.R. Filanc Construction Co., Inc.
General Engineering	Kiewit Infrastructure West Co. (Emergency Projects Only)

Pre-Qualified Contractors for Consturction Projects under $2M

General Engineering	Kingmen Construction Inc
General Engineering	Mladen Buntich Construction Co. Inc
General Engineering	Norstar
General Engineering	Pacific Hydrotech Corporation
General Engineering	PCL Construction, Inc.
General Engineering	Sancon Engineering
General Engineering	SCW Contracting Corp
General Engineering	Southern Contracting Company
General Engineering	TE Roberts
General Engineering	United Mechanical Contractors
General Engineering	W.A. Rasic Construction Co., Inc.
Glazing	Best Contracting Services, Inc.
Hazardous	E.J. Meyer Company
Hazardous	Innovative Construction Solutions
HVAC	Allison Mechanical
HVAC	Athena Engineering
HVAC	Diversified Thermal (Small Projects Only)
HVAC	F.M Thomas Air Conditioning
HVAC	United Mechanical Contractors
Instrumentation/Controls	Diversified Thermal (Small Projects Only)

Pre-Qualified Contractors for Consturction Projects under $2M

Instrumentation/Controls	Ferreira Construction
Instrumentation/Controls	Henkels & McCoy
Instrumentation/Controls	Kiewit Infrastructure West Co. (Emergency Projects Only)
Instrumentation/Controls	Southern Contracting Company
Mechanical	Diversified Thermal (Small Projects Only)
Mechanical	Kiewit Infrastructure West Co. (Emergency Projects Only)
Mechanical	Pacific Hydrotech Corporation
Mechanical	Allison Mechanical
Painting	Certa Pro Painters
Painting	Howard Ridley Co., Inc.
Painting	SoCal Pacific Construction Corp dba National Coating & Lining
Painting	Tony Painting
Paving	Horizons Construction Co. Int'l Inc.
Pipeline	Arizona Pipeline
Pipeline	Charles King Company, Inc
Pipeline	E.J. Meyer Company
Pipeline	Ferreira Construction

Pre-Qualified Contractors for Consturction Projects under $2M

Pipeline	GSE Construction Co., Inc.
Pipeline	Hemet Manufacturing Co. dba Genesis Construction
Pipeline	Kiewit Infrastructure West Co. (Emergency Projects Only)
Pipeline	Mladen Buntich Construction Co. Inc
Pipeline	Norstar
Pipeline	Pacific Hydrotech Corporation
Pipeline	Sancon Engineering
Pipeline	TE Roberts
Pipeline	W.A. Rasic Construction Co., Inc.
Plumbing	Allison Mechanical
Plumbing	F.M Thomas Air Conditioning
Plumbing	Norstar
Roofing	Best Contracting Services, Inc.
Roofing	Howard Ridley Co., Inc.
Roofing	Rite-way Roof Corp
Structural	SCW Contracting Corp
Welding	SCW Contracting Corp

APPENDIX 8

8.1. Capital Improvement Plan

INLAND EMPIRE UTILITIES AGENCYFY 2025 TYCIP BY FUND DETAILCurrent Open Projects in SAP as of 8/12/2024

Fur	Project Number	Project Description	Project Type	FY 2024 Budg	FY 2024 Total Projected Act	Total TYCIP 2025-2034
10200	AM24001	IEUA Asset Management Plan	OM	200,000	150,525	200,000
10800	AM24004	RO Asset Management TS Projects	OM	852,053	627,652	
10500	AM24007	NRW Asset Management TS Projects	OM	32,000	20,000	
10600	EN12016	North CIM Lateral	CC			
10600	EN12016	North CIM Lateral	OM			
10500	EN18023	NRWS Philadelphia Pump Station Pump 3 Im	CC			
10500	EN19014	NRWS Manhole Upgrades - 18/19	RP			
10800	EN19023	Asset Management Planning Document	OM	6,705	44,881	
10900	EN19025	Regional Force Main Improvements	CC	1,365,000	2,190,895	500,000
10900	EN19025	Regional Force Main Improvements	OM			
10500	EN20064	NSNT Sewer Siphon Replacement	CC	3,445,359	2,110,751	600,000
10900	EN21045	Montclair Force Main Improvements	CC	1,800,000	646,500	9,703,000
10800	EN21058	Regional Sewer-Hydraulic Modeling	OM	947	927	
10800	EN22005	RO Asset Managment	CC	148,363	241,490	
10500	EN22007	NRW Asset Managment Projects	CC	200,000	250	3,099,000
10500	EN22020	Philadelphia Lift Station Pump Upgrades	RP	345,112	244,871	6,000,000
10800	EN22036	RP-1 Centrate Pipeline Assessment	CC			
10800	EN22036	RP-1 Centrate Pipeline Assessment	OM			
10900	EN22045	New Regional Project PDR's	CC			
10500	EN22046	New NRW Project PDR's	CC			
10500	EN23002	Philadelphia Lift Station Force Main Imp	RP	1,500,000	165,815	21,000,000
10500	EN23002	Philadelphia Lift Station Force Main Imp	OM			
10800	EN23021	Agency Wide Infiltration and Inflow Study	OM	300,330	660	550,000
10800	EN23026	RO Assessment Projects	OM	333,597	303,019	
10800	EN23036	San Bernardino Ave LS Reliability Improv	CC	320,000	266,673	2,600,000
10800	EN23066	Preserve Lift Station Improvements	OM	1,022,341	942,529	717,000
10500	EN23077	NRW Assessment Projects	OM	50,000	4,178	
10500	EN23086	New NRW Projects PDR's FY 22/23	CC			
10500	EN24009	NRW Collection System Pipe Rehabilitaton	CC	500,000	399,996	
10800	EN24010	RSS - Collection System Pipe Rehabilitat	CC	350,000	345,000	
10500	EN24014	NRWS Manhole Upgrades - 23/24	RP			
10500	EN24016	NRWS Emergency O&M Projects FY 23/24	OM	150,000	13,005	
10800	EN24019	RO Emergency O&M Projects FY 23/24	OM	500,000	2,048	
10800	EN24023	RP3 Regional Sewer Diversion Structure R	CC	200,000	200,000	635,000
10900	EN24031	RP-4 Manhole Surcharge Remediation	CC	200,000	197,500	600,000
10500	EN24036	NRW Manhole FY 23/24	RP	180,000	118,249	
10500	EN24037	NRW PDR Projects FY 23/24	CC	50,000		
10500	EN24037	NRW PDR Projects FY 23/24	OM			
10800	EN24041	Regional Sewer-Hydraulic Modeling	OM	85,000	44,715	
10800	EN24042	RO On-Call/Small Projects FY 23/24	OM	429,989	11,878	
10900	EN24045	Collection System Upgrades FY 23/24	RP	350,321	284,903	
10900	EN24052	BonView Sewer Jacked Casing Union Pacifi	CC	100,000	100,123	3,900,000
10600	EN24055	RP3 Diversion Structure Height Extension	CC	75,000		28,500
10800	EN24059	Chino Hills Trunk-014 Sewer Siphon CIPP	CC	150,000		1,150,000
10800	EN24064	RP-5 to RP-2 Sludge Line Repair	CC	1,800,000		
10800	EN24064	RP-5 to RP-2 Sludge Line Repair	OM			
10800	EN25010	RSS - Collection System Pipe Rehabilitat	CC			6,000,000
10500	EN25014	NRWS Manhole Upgrades - 24/25	RP			
10900	EN25015	Collection System Upgrades 24/25	RP			
10800	EN25019	RO Emergency O&M Projects FY 24/25	OM			300,000
10500	EN25024	Non-Reclaimable Waste Project PDR's 2425	CC			500,000
10500	EN25026	Non-Reclaimable Waste Manhole FY 24/25	RP			1,800,000
10500	EN25027	4th St NSys North Trunk Pipe Repair BSS	OM			370,000
10500	EN25035	Non-Reclaimable Waste Condition Assessme	OM			500,000
10500	EN25036	Non-Reclaimable Waste Connections	OM			1,300,000
10500	EN25037	Non-Reclaimable Waste Modeling	OM			53,000
10500	EN25038	NRWS On Call Small Projects FY 24/25	OM			500,000
10900	EN25041	Collection System Upgrades FY 24/25	RP			5,000,000
10800	EN25055	Regional Sewer Hydraulic Modeling FY2425	OM			440,000
10800	EN25063	Agency Wide Air Relief Valves	OM			300,000
10800	EN25065	Caltrans IEUA Collections Pad Constructi	OM			140,000
10500	EN25066	NRWS Collection System Pipe Rehabilitati	CC			8,000,000
10900	EN25067	Caltrans IEUA Collections Sewer I-10 Rel	CC			1,985,000
10900	EN25071	San Bernardino Lift Station Containment	CC			400,000
10500	EN26002	Vineyard Pipe Repair	CC			660,000
10900	EN26003	Regional System Siphon Barrel Gate Impro	CC			935,000
10500	EN26016	NRWS Emergency O&M Projects FY 25/26	OM			450,000
10500	EN26020	Lift Station AMP Projects	RP			
10800	EN26021	Regional Conveyance AMP	CC			
10500	EN27002	NRWS Emergency O&M Projects FY 26/27	OM			
10800	EN27005	RO Emergency O&M Projects FY 26/27	OM			
10900	EN27006	Chino Interceptor Diversion Pipe Repair	CC			3,100,000
10900	EN27007	Montclair Diversion Structure Enhancemen	RP			500,000
10500	EN28003	Brine System Siphon Barrel Gate Improvem	CC			510,000
10900	EN28005	Cucamonga Interceptor Pipe Repair	CC			1,150,000
10800	EN30002	CCWRF Outfall Discharge Structure and Cu	OM			520,000
10800	EN30003	Regional Operation Asset Management	OM			5,000,000
10900	EN31001	Freeway Trunk Pipe Repair	CC			13,000,000
10900	EN31002	Riverside Drive Trunk Pipe Repair	CC			4,250,000
10800	EP17005	Agency-Wide Condition Assessment	OM			
10800	FM25011	Recuring Regional Sewer Manhole Prcurmt	OM			1,000,000
10500	PL21002	NRWS Rate Study	OM	288,107	288,107	50,000
10800	PL23004	Wastewater Flow and Loading Study	OM	550,689	550,689	114,000
						3,464,405,466

APPENDIX 9

9.1. System Performance Monitoring Dashboards

Sewer Cleaning and Inspection Dashboard

Select Time Period: Last 30 Days | Last 90 Days | Since 7/1/2022 | All-time

Sewer Inspection

RSS Inspection Progress

BSS Inspection Progress

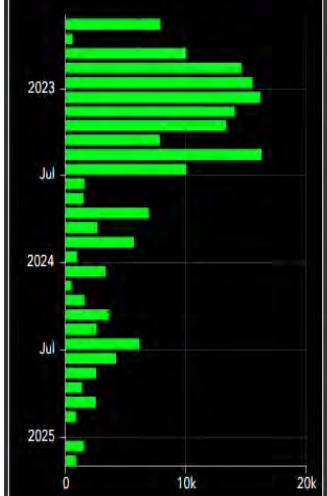
RSS Footage Inspected

390k (Lf.)

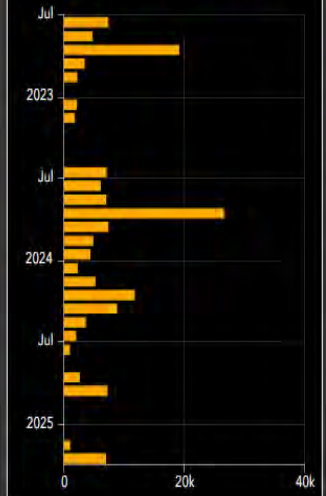
BSS Footage Inspected

264.7k (Lf.)

Footage Inspected By Month (from 7/1/2022)



Footage Inspected By Month (from 7/1/2022)



Sewer Cleaning

RSS Cleaning Progress

BSS Cleaning Progress

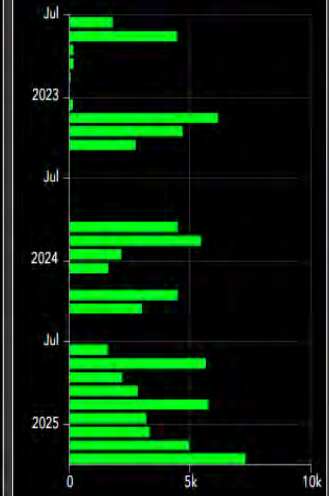
RSS Footage Cleaned

129k (Lf.)

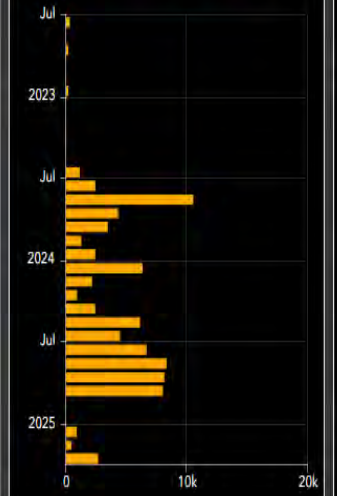
BSS Footage Cleaned

104.5k (Lf.)

Footage Cleaned By Month (from 7/1/2022)



Footage Cleaned By Month (from 7/1/2022)



Manhole Inspection

RSS Manhole Inspection Progress

BSS Manhole Inspection Progress

RSS Manholes Inspected

1,456

BSS Manholes Inspected

946

Manholes Inspected By Month (from 7/1/2022)

Manholes Inspected By Month (from 7/1/2022)

Regional Sewer System (RSS) Condition Assessment Dashboard

SSO Incident Location

- 1 Category 1
- 2 Category 2
- 3 Category 3

Due for Repair (PL)

Due for Re-inspection (PL)

RSS Manhole - Buried (Verified by CCTV)

SmartCover Systems

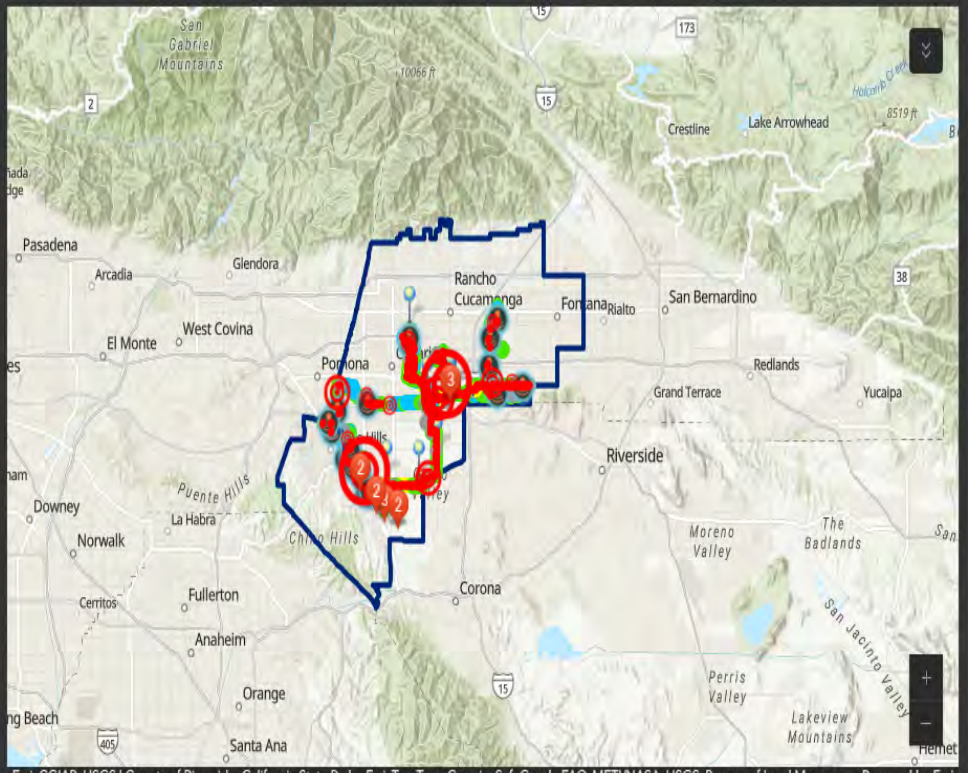
RSS Pipeline Inspection Summary

Overall Rating

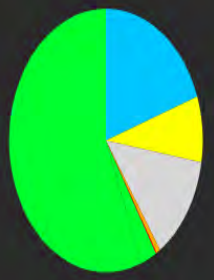
- 0-1 - Excellent (Re-inspect in 5+ years)

Due for repair	Due for re-inspection	Due for repair	Due for re-inspection
11 segments	507 segments	195 manholes	191 manholes

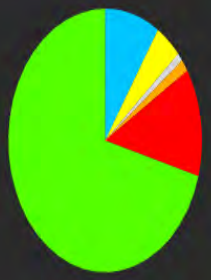
Due for cleaning	Need additional cleaning
59 segments	10 segments

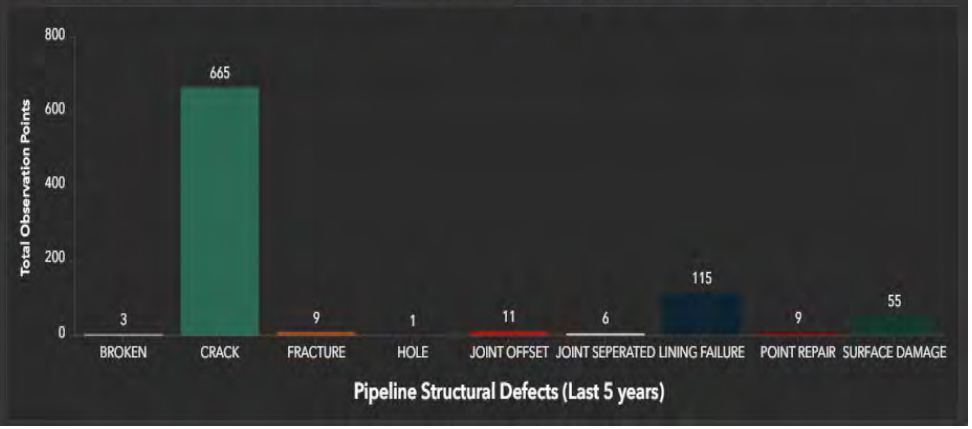


Pipeline Condition - Overall Rating



Manhole Condition - Overall Rating





About

The purpose of this dashboard is to provide quick information on the Regional Sewer System (RSS) pipeline and manhole conditions.

To download or analyze the inspection data, click here.

To compare the cleaning status with the inspection status, click here.

Brine Sewer System (BSS) Condition Assessment Dashboard

SSO Incident Location

- Category 1
- Category 2
- Category 3

Due for Repair (PL)

Due for Re-inspection (PL)

BSS Manhole - Buried (Verified by CCTV)

SmartCover Systems

BSS Pipeline Inspection Summary

Overall Rating

- 0-1 - Excellent (Re-inspect in 5+ years)

About

The purpose of this dashboard is to provide quick information on the Brine Sewer System (BSS) pipeline and manhole conditions.

To download or analyze the inspection data, click here.

To compare the cleaning status with the inspection status, click here.

Due for repair

13

segments

Due for re-inspection

134

segments

Due for repair

124

manholes

Due for re-inspection

150

manholes

Due for cleaning

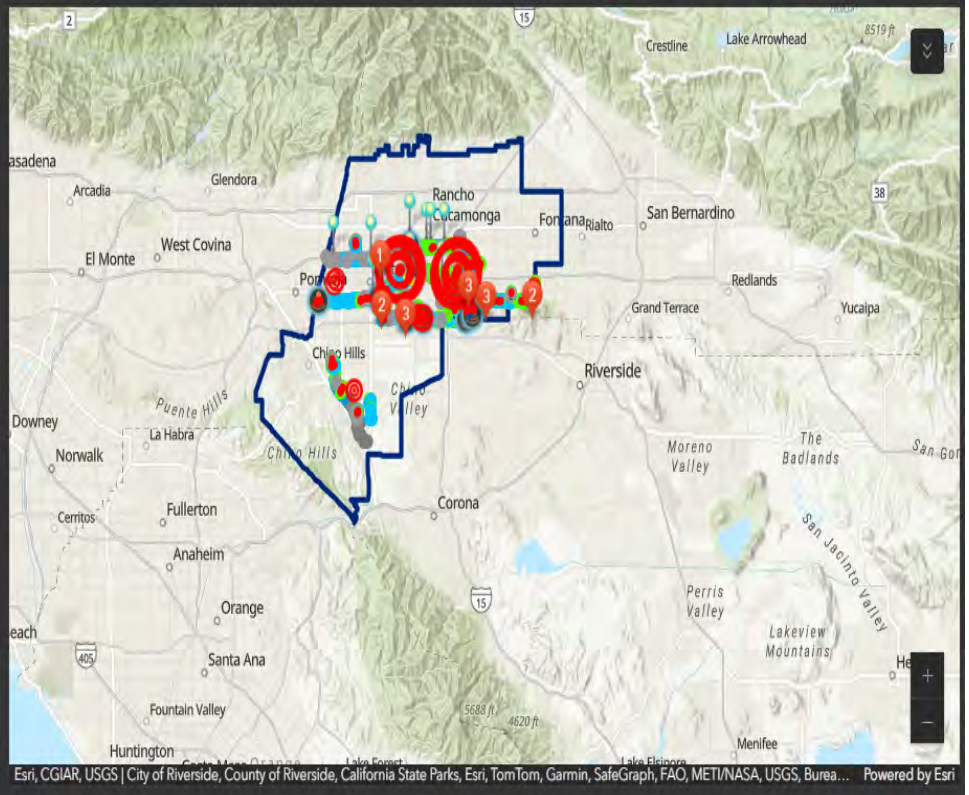
40

segments

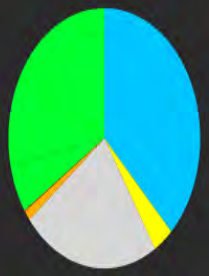
Need additional cleaning

5

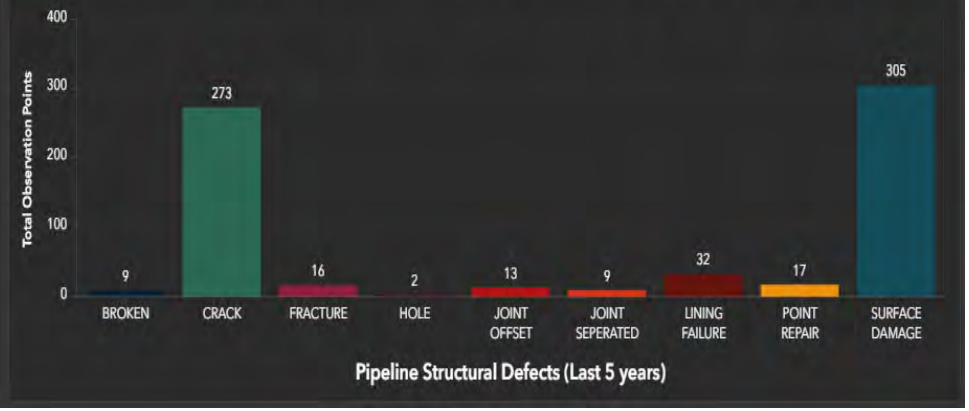
segments



Pipeline Condition - Overall Rating



Manhole Condition - Overall Rating



APPENDIX 10

10.1. 2021-2024 SSMP Audit

Inland Empire Utilities Agency
A MUNICIPAL WATER DISTRICT

Sewer System Management Plan (SSMP) Audit

(May 2021 to May 2024)

Prepared by:

FISCHER COMPLIANCE LLC
PRACTICES THAT COMPLY

Sanitary Sewer Collection System

WDID=8SSO10580

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF APPENDICIES

REVIEWED AND APPROVED BY

LUCIA DIAZ,

Inland Empire Utilities Agency

Manager/Facilities & Water System Program

Legally Responsible Official (LRO)

_____

Date Signed: _____

Signature indicates system operators were provided opportunity to comment on the Audit findings[1]

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

CERTIFICATE

OF COMPLETION

INLAND EMPIRE UTILTIES 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.*

FISCHER LLC COMPLIANCE
PRACTICES THAT COMPLY

Jim Fischer

James Fischer, PE (NPDES Compliance Inspector)

10/18/24

FISCHER COMPLIANCE LLC
PRACTICES THAT COMPLY

3230 Arena Blvd, Suite #245
Sacramento, CA 95834
916.606.5275
FischerCompliance.com

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,

Jim Fischer

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.

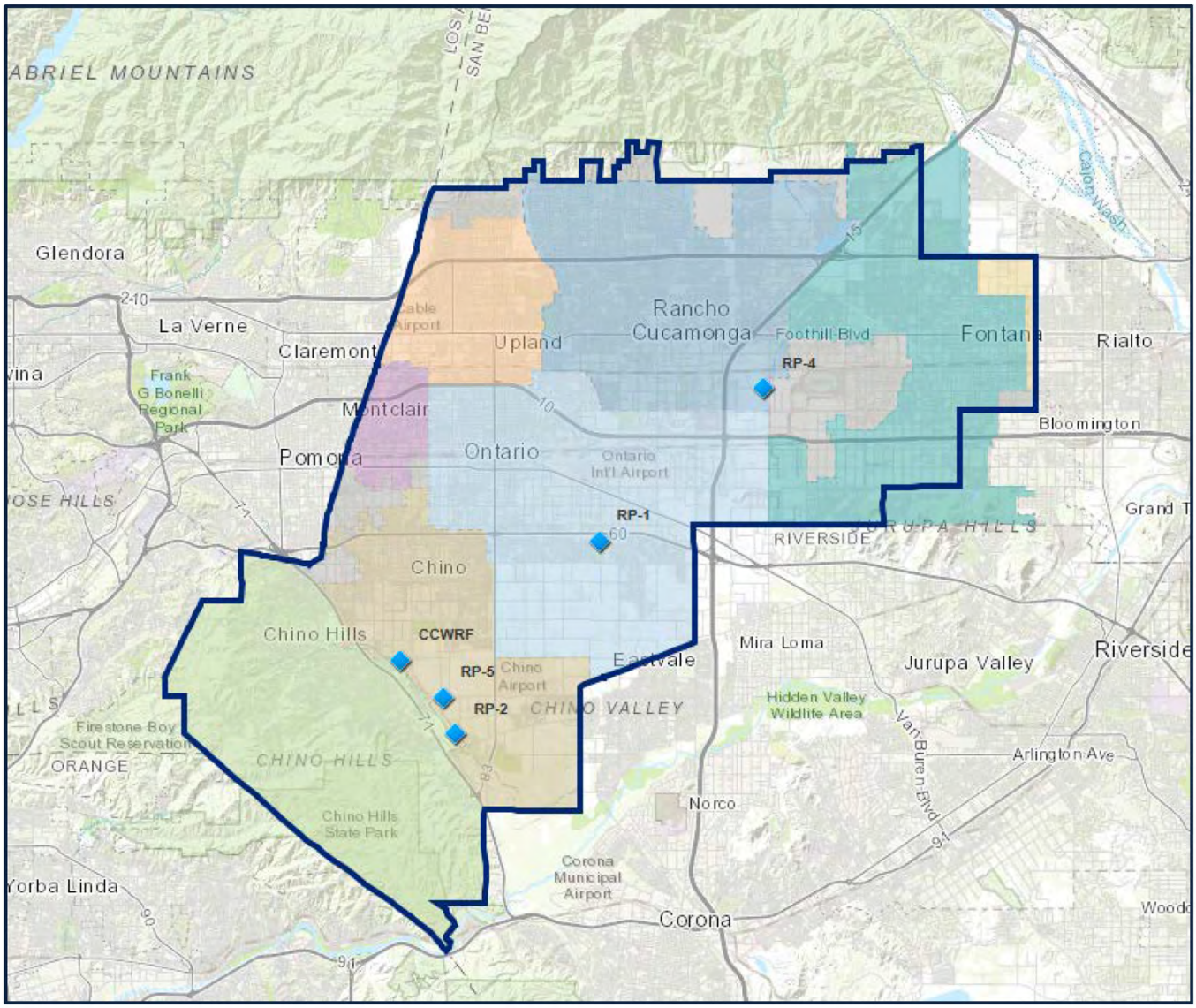
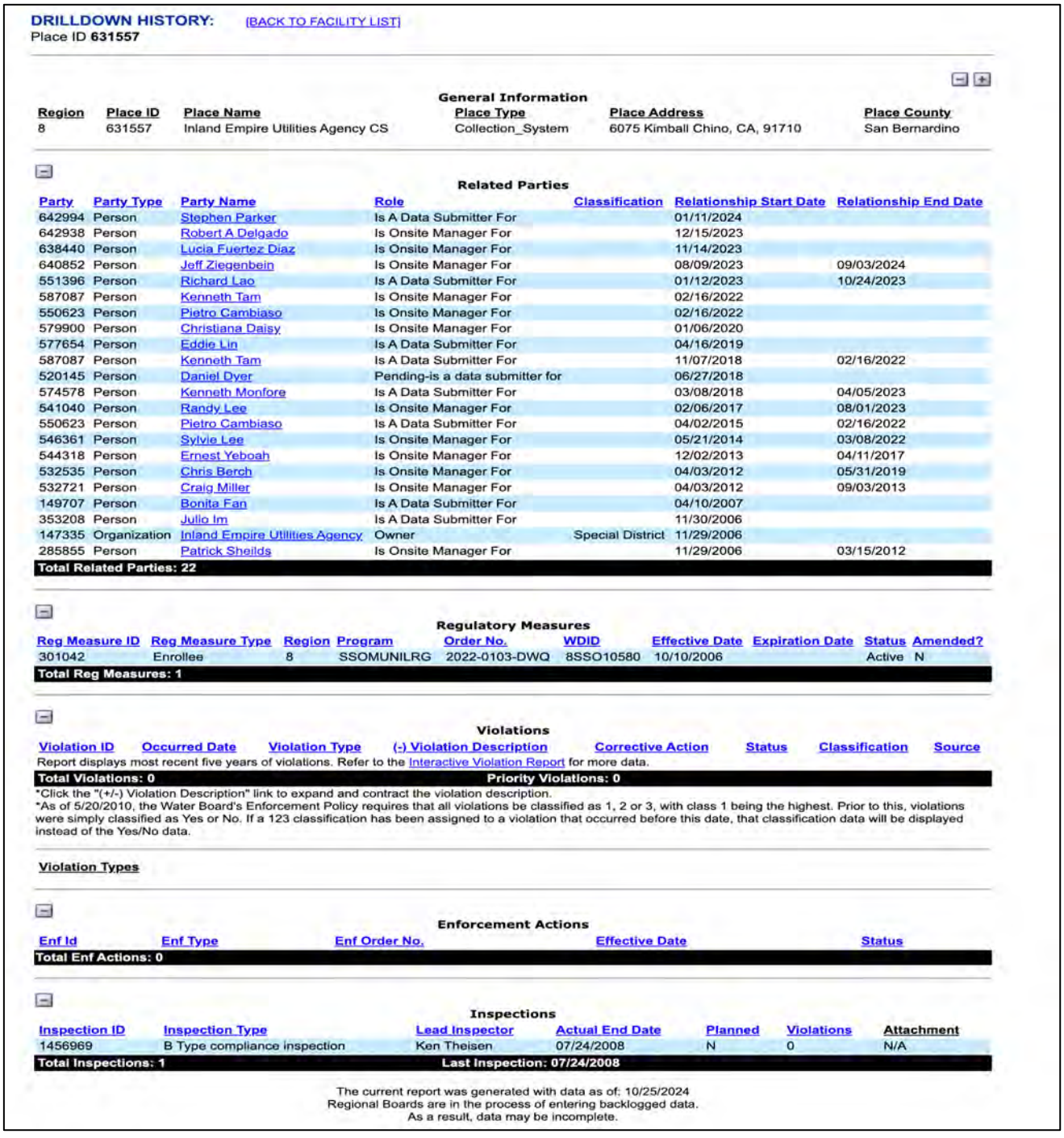


Figure 1 - IEUA Sewer Service Area Boundary Map

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 Sheilds	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)

[3]*California Integrated Water Quality System (CIWQS), availably 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.

8SSO10580

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)

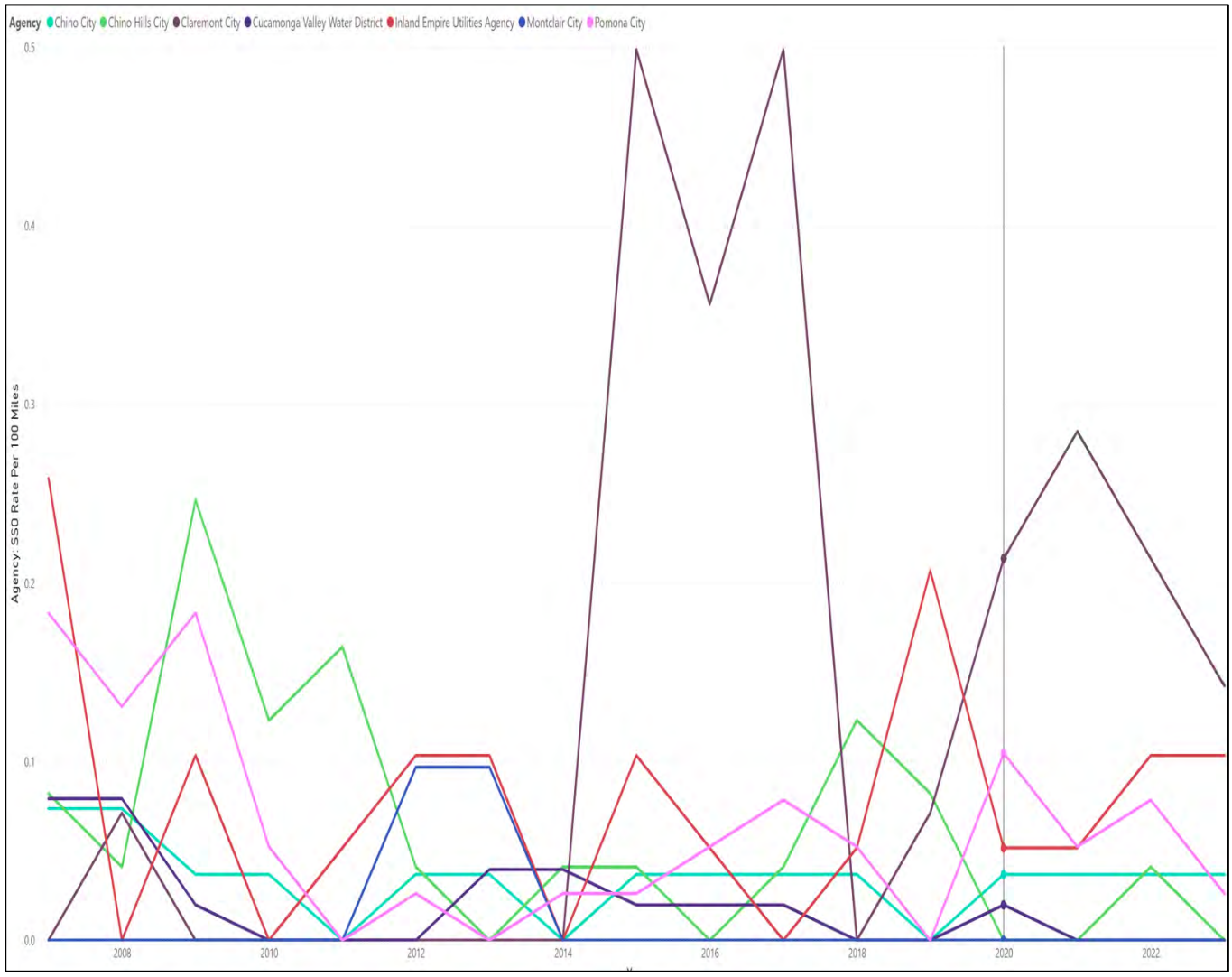


Figure 5 - IEUA Spill Rates (# of spills/100 miles) compared with other agencies during (2007-2024)

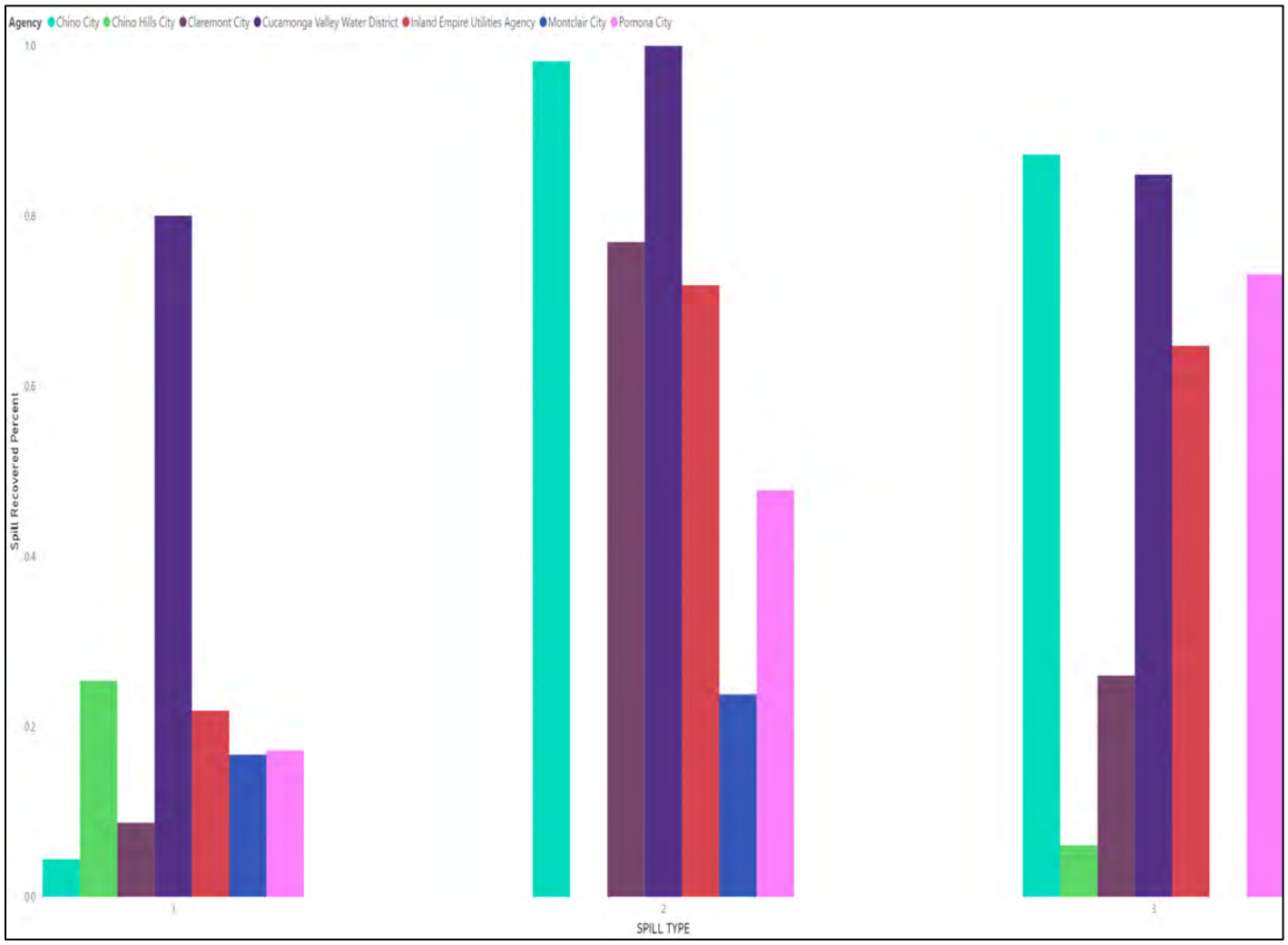


Figure 6 - IEUA spill recovery metrics (Cat 1/2/3 spills) compared with other agencies, 2007-2024

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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Page 14	• 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	• **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: 1. Has the schedule for conducting audits been adhered to? 2. Has the schedule for updating the Sewer System Management Plan been adhered to? 3. Are established milestones being Monitored? 4. Is the sewer system management program description up to date? 5. Have audits been performed on schedule? 6. Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)? 7. Is asset data kept in the computerized maintenance management system, GIS, etc., programs up to date? 8. Does the sewer system asset overview reference up to date maps?

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
RESILIENCE	Page 14	• **Recommendation:** To help provide resilience, the IEUA should: 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 Checklist[6])

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

REQUIREMENTS[1]

"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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 16-25	• The inspection revealed the IEUA is implementing this element.
EFFECTIVENESS	Pages 16-25	• **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: 1. Have there been instances when a service call for a spill was not properly routed to response personnel? 2. Was all spill response activity documented/prepared for LRO? 3. Have there been any changes in assigned responsibilities for implementing the Sewer System Management Plan? 4. Is there a process in place for ensuring all contact information remains up to date? 5. Is process established for ensuring org. chart is current?
RESILIENCE	Pages 16-25	• **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: 1. Designate more than one LRO to help ensure full and continuous coverage of duties. 2. Ensure more than one staff member can implement and be responsible for specific Sewer System Management Plan elements. 3. 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

REQUIREMENTS[7]

"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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 26-30	• The inspection revealed the IEUA is implementing these requirements.
EFFECTIVENESS	Pages 26-30	• **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: 1. Annually review IEUA codes and ordinances for ensuring they are adequate in fulfilling all required legal requirements. 2. Check for instances when the code/ordinance did not address a specific need/circumstance.
RESILIENCE	Pages 26-30	• **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: 1. Monitor performance of ordinances, codes, and agreements for deficiencies and omissions. 2. Perform periodic review of ordinances, codes, and service agreements. 3. 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

REQUIREMENTS[8]

"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

REQUIREMENTS[1]

"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

REQUIREMENTS[1]

- "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	**WDR CONFORMANCE (AREAS OF CONCERN):** 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. • AOC D1 (see Appendix 1, Table 11): 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. • AOC D3 (see Appendix 1, Table 11): The inspection revealed the need for improvements for procedures to ensure all mapping issues identified by field operations staff are timely updated • AOC D4 (see Appendix 1, Table 11): 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. • AOC D7 (see Appendix 1, Table 11): 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. • 2021 Audit: Re-evaluate existing backup supplies, parts, and critical equipment inventory/list.

Areas Assessed	SSMP Ref.	Audit Findings/Recommendations
EFFECTIVENESS	Pages 14-24	• **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: 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	• **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: 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

REQUIREMENTS[9]

"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

REQUIREMENTS[1]

- "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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 44-45	• The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Pages 44-45	• **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: 1. Does the IEUA implement its current design and construction standards, specifications, and inspection procedures? 2. Does the IEUA periodically review design and construction standards, specifications, and inspection procedures for ensuring conformance to requirements? 3. Does the IEUA have a review process for its standards and procedures? 4. Were any design or installation deficiencies found during warranty inspections? 5. Are hydraulic model findings included in the design process? 6. Does the IEUA stay abreast of industry design standards?
RESILIENCE	Pages 44-45	• **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: 1. Staying abreast of industry trends and standards. 2. Performing warranty inspections of newly installed or repaired assets to evaluate design and installation practices. 3. 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

REQUIREMENTS[10]

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	• The inspection revealed the IEUA is in compliance with these requirements.
IMPLEMENTATION	Pages 46-48, App. E	**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. • 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	• **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: 1. Check to ensure the IEUA is implementing all recommendations for spill emergency response plans incorporated in SSMP Guidance Manual (see pages 35-39). 2. Does the agency implement an effective Spill Emergency Response Plan?

RESILIENCE	Pages 46-48, App. E	• **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: 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.

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

REQUIREMENTS[11]

"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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 49-50	• The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Pages 49-50	• 2021 Audit - 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: 1. Have there been any blockages/spills from any identified problem area? 2. Is the agency receiving feedback on public outreach efforts? 3. Is the debris and other sewage solids collected during cleaning activities being disposed of appropriately? 4. Does the agency have a plan and schedule for inspection of grease producing facilities? Was the schedule adhered to? 5. Have there been spills due to excessive fats, oil, or grease in the system? 6. Are Source Control staff included in the plan check process?
RESILIENCE	Pages 49-50	• **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: 1. Inspect assets directly downstream of grease producing businesses to- ensure source control is effective. 2. Develop outreach doorhangers or flyers to perform targeted outreach when discoveries are made in the field. 3. Perform regular assessments of system assets to monitor performance. 4. 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

REQUIREMENTS[12]

"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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 51-57	**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. • AOC D2 (see Appendix 1, Table 11): The inspection revealed the that improvements to existing manhole inspection program (resources, data collection/tracking) vs. only documenting known problems when discovered during cleaning/CCTV are needed. • AOC D5 (see Appendix 1, Table 11): Budgeting/Capital Improvements: field operators noted during the onsite inspection that budgeting issues have sometimes impacted necessary improvement projects including lining of siphons. • AOC D6 (see Appendix 1, Table 11): 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). • Climate Impacts/Vulnerabilities: 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	• **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: 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.

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

REQUIREMENTS[13]

"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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Page 58	• The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Page 58	• **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: 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	• **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: 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

REQUIREMENTS[14]

"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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Page 59	• The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Page 59	• **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: 1. Have audits been performed as required? 2. Have the audits assessed compliance, implementation, and effectiveness? 3. Have deficiencies been identified? 4. Has a plan and schedule to rectify the deficiencies been established?
RESILIENCE	Page 59	• **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: 1. Periodically evaluate key performance indicators to assess effectiveness of each Sewer System Management Plan element. 2. Evaluate previous audit findings for ensuring deficiencies have all been addressed/rectified. 3. Calendar the audit due dates and complete the audit on time. 4. 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

REQUIREMENTS[15]

"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	• The inspection revealed the IEUA complies with this element.
IMPLEMENTATION	Pages 60-63	• The inspection revealed the IEUA is implementing these requirements with its existing SSMP.
EFFECTIVENESS	Pages 60-63	• **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: 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	• **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. 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

REQUIREMENTS[16]

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)

APPENDIX 11

11.1. Crisis Communication Plan

Inland Empire Utilities Agency
A MUNICIPAL WATER DISTRICT

Crisis Communications Plan

Inland Empire Utilities Agency
External & Government Affairs

Updated October 2024

Table of Contents

I. PURPOSE

The purpose of the Inland Empire Utilities Agency's (IEUA/Agency) Crisis Communications Plan is to establish and document procedures and best practices for internal and external crisis communications and work toward the Agency's full preparedness for seamless and consistent communication in times of crisis. Establishing communication channels and utilizing all resources will improve efficiency and effectiveness of communication to ensure that IEUA employees and stakeholders have immediate access to information.

Objectives of this Crisis Communications Plan are as follows:

- Prepare IEUA to effectively and deftly manage crisis communications;
- Strategically enhance the Agency's representation and public understanding of the value of the services provided by IEUA;
- Maintain the Agency's positive reputation and brand;
- Manage and monitor the distribution of critical and sensitive information to the media and external audiences; and,
- Establish the communication flow during times of crisis.

When speaking with the media and external audiences, IEUA will provide factual information and messages most beneficial to the Agency. IEUA's messages should be responsive and provide clear information which reinforces the Agency's commitment to the community.

The contents of the Crisis Communications Plan are intended for use by IEUA leadership and staff who play a vital role in Agency communications, particularly during a crisis. The information within this document should prioritize transparency, timely updates, respect, and empathy. An annual review of this plan by Senior Leadership, the External Affairs team, and Safety will further promote preparedness and enhance the Agency's ability to manage unexpected events.

This plan acts as a supporting document to the Agency's Emergency Response Manual (ERM). This document is intended to clearly define the communication strategy and approach given certain incidents and crises that the Agency may deal with. It is not intended to supersede the ERM.

II. POSSIBLE CRISIS SCENARIOS

For the purpose of this plan, a crisis is defined as any significant event which could jeopardize the operations and/or brand/reputation of IEUA. A crisis often prompts significant news coverage and public scrutiny and could present physical harm to employees or customers of IEUA or damage to the reputation of the Agency.

The crises which IEUA staff and stakeholders might encounter fall into general categories, which include but are not limited to:

A. Natural Disasters:
Examples: Floods, earthquakes, wildfires, excessive heat, drought

B. Violent Acts, Demonstrations, Cyber Security Attack, Death, or Injuries:
Examples: Active shooter, demonstrations against IEUA and/or Customer Agencies, death or injury of staff while conducting Agency business

C. Criminal or Legal Action:
Examples: Staff or volunteer charged with a crime, sexual harassment lawsuits, staff member accused of sexual misconduct, allegations of employee fraud, litigation by Customer Agencies or other public agencies

D. Resource Crisis:
Examples: Sewer system spill, water pollution, hazard material spill, force main break

III. CRISIS COMMUNICATIONS GUIDELINES

1. All crises should be reported to the Senior Leadership team immediately.

2. Only IEUA's Director of External and Government Affairs and/or Communications Officer and identified members of the Crisis Communications Team are authorized to release information to the media and external audiences. All other staff should remain professional and helpful to the media by connecting them with the Director of External and Government Affairs and/or the Communications Officer but will not otherwise provide any information to the media.

    a. IEUA's Director of External and Government Affairs and IEUA's Communications Officer are considered the Agency's Public Information Officers (PIO) for crisis communication implementation.

3. The crisis should be evaluated, and approach should be determined on whether a Joint Information Center (JIC) needs to be activated.

    a. The PIO is responsible for knowing when and how to activate this Crisis Communications Plan and a JIC. The JIC is the method of operating during an incident that allows multiple PIOs (two or more) from different entities to coordinate information and integrate messages to avoid confusing external audiences (*See Appendix I*).

4. All comments to the media should be guided by professionalism and transparency and serve to mitigate the crisis while reinforcing the Agency's positive role within the community.

5. Customer and personnel matters are always to remain confidential unless otherwise specified by Human Resources and Legal Counsel.

6. Legal counsel should be consulted on any matters related to anticipated or active litigation.

7. The Agency should make all attempts to be as proactive as possible in messaging. Responses should be timely. IEUA recognizes the importance of and correlation between media relations and public trust. In times of crisis, maintaining effective media relationships will be particularly critical in bolstering public confidence in the Agency.

8. It is critical to ensure that messaging is consistent and respectful amongst all audiences and that empathy is demonstrated for those affected by the situation.

IV. CRISIS COMMUNICATIONS TEAM

Each crisis is unique, and the magnitude of the communications process will depend on the severity of the incident and its impact on IEUA operations. IEUA's External Affairs Team will manage the information communicated on all IEUA related incidents and identify IEUA's primary spokesperson on a situational basis. In the event of a crisis, the External Affairs Team will take the role of the Agency's Crisis Communications Team and assume responsibility for the distribution of information to all relevant internal and external sources.

Crisis Communications Team contact information available in Appendix A.

A. Communication Flow

Refer to Image 1 for the Agency's Crisis Communication Team direction and information flow chart.

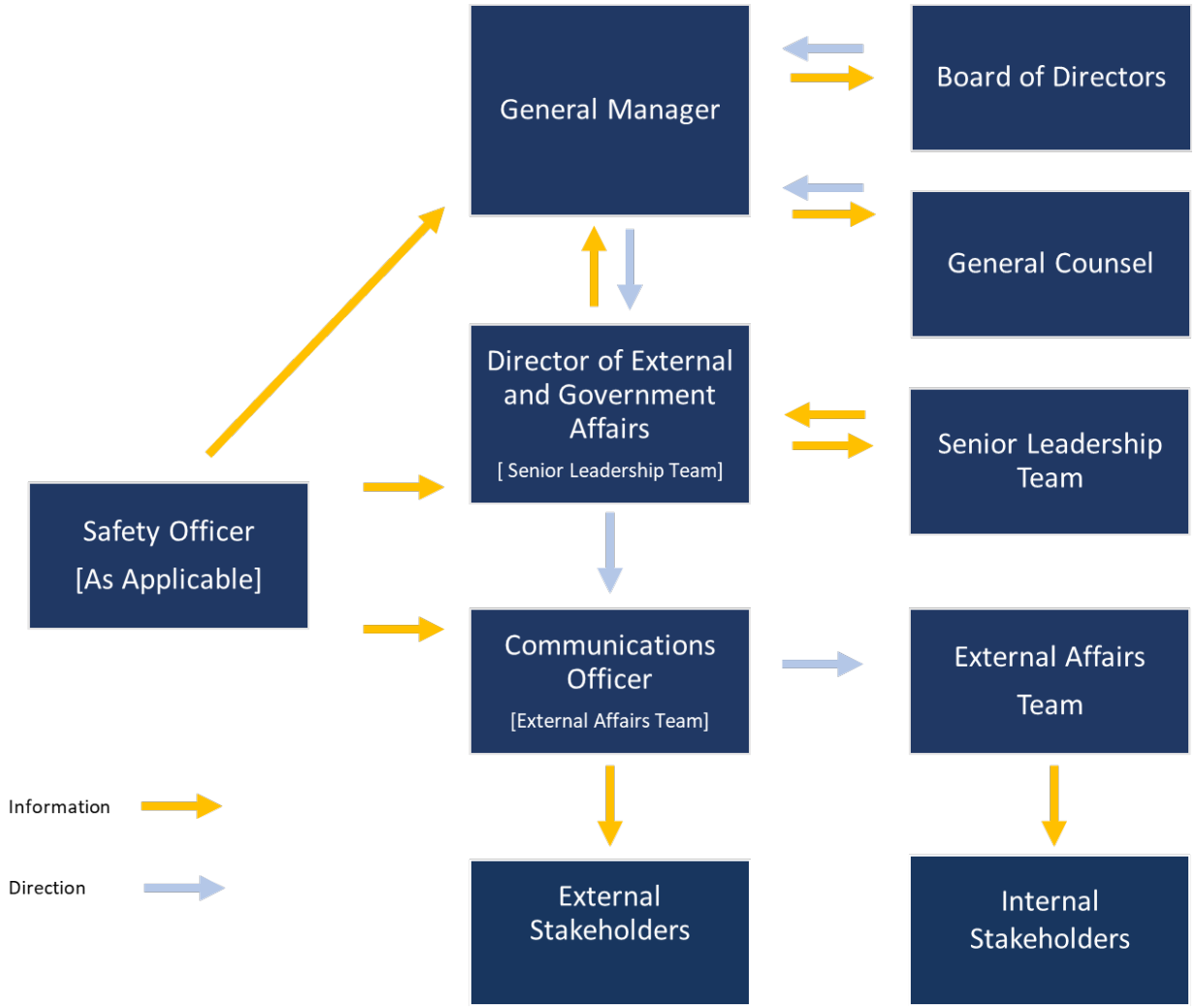
All employees must be informed with as much detail as possible about the crisis in a timely manner, as appropriate. The External Affairs Team should include information about steps the Agency is taking to mediate the situation.

In the event of a public relations crisis during which the reputation of the Agency is at stake, not all methods of communication may be used, and it may not be necessary to inform all staff or external audiences. Discretion regarding whom to inform and which communication methods to use will be determined on a case-by-case basis by the Communications Officer and External Affairs Team in consultation with IEUA's Senior Leadership Team. In addition, in the event of a public relations crisis, there may be more time to react and form key messages or emails.

Communication Flow

CRISIS COMMUNICATIONS TEAM

Image 1



B. External Affairs Team Responsibilities

During a crisis, the External Affairs Team is responsible for many tasks, including JIC coordination (when applicable), social media management, website updates, rumor control, internal mass communication, and external communication. Depending on the scale of the crisis, there may be multiple individuals handling these tasks.

The External Affairs Team will develop a detailed plan to address the crisis through completing the following list of responsibilities:

1) Identify the crisis and determine if JIC should be activated (*Appendix I*).

2) Coordinate a Crisis Response Team to include appropriate Agency representatives knowledgeable on the issue.

    a. The Crisis Response Team will:
        - Identify the target audience/key stakeholders
        - Develop key message points (*Appendix B*)
        - Identify and train an Agency spokesperson (*Appendix H*)
        - Distribute the Media Contact Notification Form, as applicable (*Appendix G*)
        - Deliver key messages through a variety of communication platforms

3) Monitor media and external response to crisis.
    a. Regularly update and track Media Log (*Appendix G*)

4) Re-evaluate and amend key messages as new information arises.

5) Perform a post-crisis analysis to evaluate responsiveness and effectiveness.

The External Affairs Team will assist in crafting key messages for distribution internally and externally when necessary to convey the situation and reflect a unified response. Typically, these messages will include what is happening or has happened, who is affected, what the Agency is doing, and possibly a message of compassion/care. Each key message should include support points. The Message Mapping Sheet (*Appendix B*) includes information on how to develop these messages.

During a crisis, timeliness is essential. For this reason, it is important to streamline communication and remove non-essential people from communication pathways. As such, the External Affairs Team must have autonomy in distributing information.

Communications Officer Role: The Communications Officer is responsible for the formulation and release of information regarding the incident. It is also the responsibility of the Communications Officer to work directly with the Director of External and Government Affairs to determine if a JIC needs to be activated.

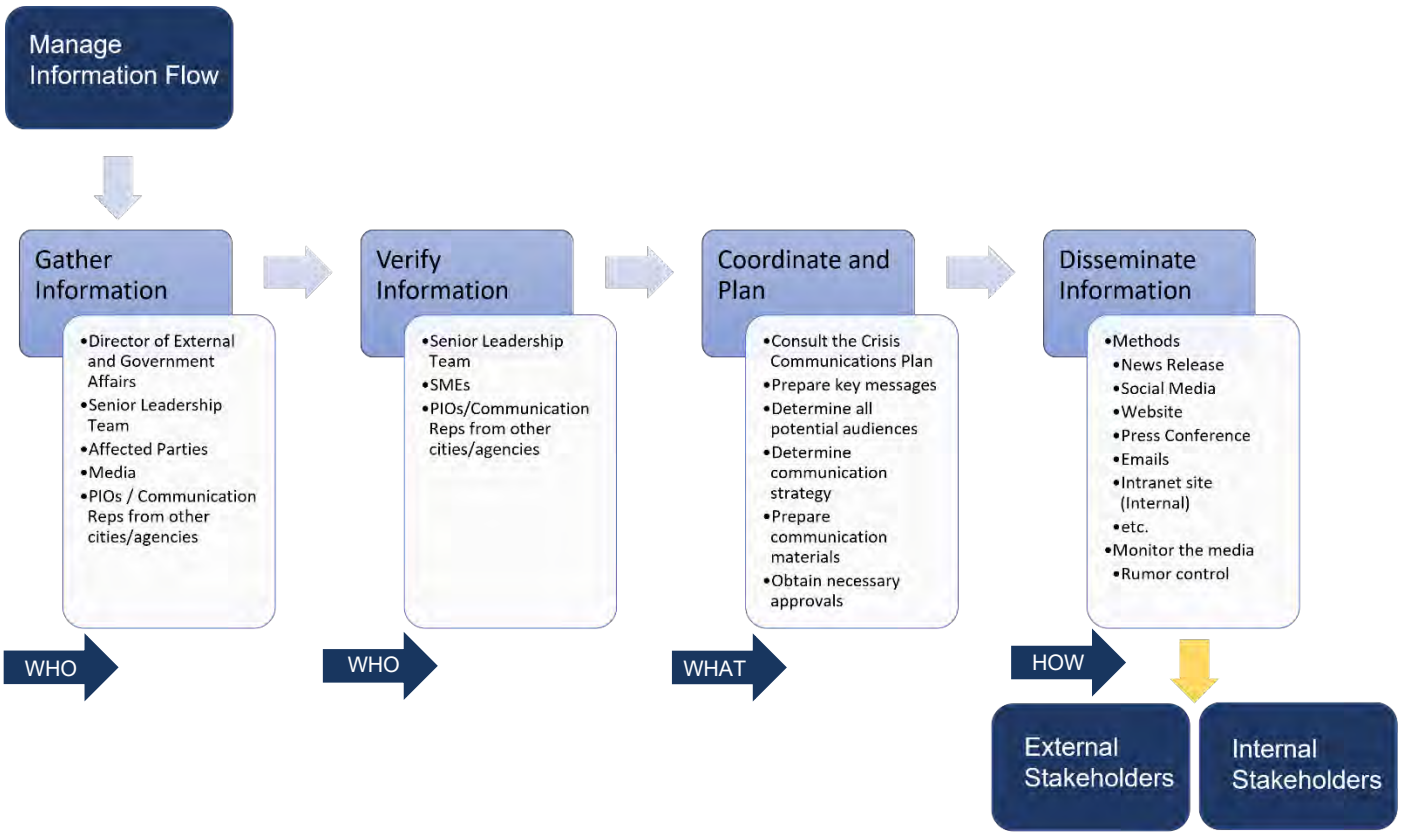
The Communications Officer serves as the contact point for news media, develops the format for press conferences, and coordinates media releases. The Communications Officer also ensures external audiences receive complete, accurate, timely, and consistent information about life safety procedures, public health advisories, relief and assistance programs, and other vital information. The Communications Officer reports directly to the Director of External and Government Affairs and navigates and reviews all communication prepared by the External Affairs Team.

Manage Information Flow:
The main purpose of the Communications Officer's role is to serve as an intermediary between the Agency and external audiences. The Communications Officer ensures external audiences are informed and acts as the clearinghouse for accurate information while monitoring external conversations about the Agency. The ever-present overarching goal is to earn and keep the public and stakeholders' trust.

More specifically, the Communications Officer works with the Director of External and Government Affairs, Senior Leadership Team, and other affected parties to gather information, quell rumors, and gauge external perception and reaction to an incident. This is done in partnership with the entire External Affairs Team.

The External Affairs Team coordinates consistent information about lifesaving procedures, health preservation instructions, emergency status, and relief programs and services.

Information Flow



First 60 Minutes:

- Contain the immediate crisis.
  - Ensure that calls have been made to all appropriate emergency responders (i.e. call 9-1-1 if appropriate).
  - Coordinate and cooperate with emergency responders.
- Follow internal notifications process (Reference Crisis Communication Team Chart).
  - Notify Senior Leadership [Senior Leadership will follow their communication protocol for notifying the Agency's Board of Directors]
  - Notify External Affairs Team.
  - Notify appropriate Department Managers.
- First meeting or conference call to quickly assess and gather known facts. Include PIO, General Manager, and Senior Leadership Team at minimum.
  - What happened?
  - How did it happen?
  - When did it happen?
  - What was the cause?
  - Were there any injuries?
  - What was the extent, if any, of the damage?
  - Is there any current or ongoing danger?
  - What recovery efforts are underway?
  - How/If this affects Agency brand/reputation.
- Identify if JIC needs to be activated. If so, notify appropriate PIOs.
- Notify front line staff to direct calls from media, community, government and family to administrative support, an appropriate team member, or pre-recorded voicemail box.
- Organize a public information response, based on what is known. Discuss whether to wait for more information or communicate proactively.
- Draft appropriate holding statement/news release/talking points.
- Draft potential Q&A document.
- Outreach to and coordinate with outside agencies.
- Provide initial holding statement to the media.

First 90 Minutes:

- Determine crisis level and response needed, in consultation with Director of External and Government Affairs.
- Ensure clear understanding of internal roles and responsibilities.
- Each External Affairs Team member should assume their role(s).
- Assess the need to bring in subject matter experts or additional outside resources.

- Upon conferring with Senior Leadership, determine if situation dictates the necessity for an onsite spokesperson.
  - External Affairs will determine an appropriate onsite spokesperson. Only those individuals who have taken IEUA's Media Training may serve as an onsite spokesperson.
- After discussing proactive v. responsive communications, decide on best communication method(s):
  - Holding statement
  - News release
  - Individual reporter briefings
  - Targeted email distribution
  - Website
  - Social media
  - Radio station
- Identify spokespeople and potential third-party subject matter experts for media.
- Update Senior Leadership Team on the public information response.
- Send internal communication to employees.
- Begin media and internet monitoring.
- Identify location for media briefings that is away from the incident site.
- Discuss level of crisis response.
  - Is this a local crisis?
  - What are the national implications?
  - What are the implications for employees?
  - What are the implications for external audiences?
- Disseminate public information tools as appropriate.
- Consider all other interested parties/stakeholders/audiences and communicate appropriately.

First 2 Hours:

- Conduct team update.
- Discuss and approve public information strategies/tactics.
- Assess the need for additional resources. If the response becomes 24/7, sufficient personnel must be available to staff all shifts.
- Update key stakeholders not already reached, including elected officials.
- Continue communicating with employees, including a reminder that all media inquiries should be directed to the PIO.
- Prepare and train designated spokesperson to communicate with external audiences.
- Assess need to hold news briefing or other proactive communications.
- Evaluate news coverage and correct inaccurate information.
- Receive updates from staff in the field if applicable.
- Communicate, as appropriate, with the media.
- Coordinate with outside agency PIOs if applicable.

By End of Day One:

- Shift from reactive to proactive communications (emphasize concern and discuss efforts to resolve crisis and prevent future incidents).
- Evaluate news coverage and correct inaccurate information.
- Assess the need to address rumors circulating internally or over the internet, including social platforms.
- Monitor the ongoing crisis to determine next steps:
  - Conduct news briefing as events warrant.
  - Provide periodic updates and individual interviews to media.
  - Post updates to Agency website and social media.
- Evaluate the need for and prepare or update any of the following communications:
  - News releases or media advisory
  - Internal list of Q&A's
  - Communication collateral to key stakeholders
- Ensure all facts are documented and well-organized.
- Ensure action steps are documented and well-organized.
- Assess the need for further support from technical experts or third-party experts.
- Brief or update legislative and regulatory audiences where appropriate.
- Receive briefing from field staff.
- Brief or update the media.
- Continue to coordinate with outside agencies as applicable.

Ongoing:

- Control Agency messages and spokespeople.
- Continue shift from reactive to proactive communications (emphasize concern and discuss efforts to resolve crisis and prevent future incidents).
- Evaluate overnight news coverage and news coverage to date.
- Monitor news coverage, social media, and the internet to assess external audiences' reaction to the crisis.
- Evaluate the ongoing crisis to determine next steps:
  - Conduct news briefings as event warrants.
  - Provide periodic updates and individual interviews to the media.
  - Post updates to the website and social media.
- Evaluate the need for and prepare any of the following communications documents:
  - News releases or media advisory
  - Internal list of Q&A's
  - Communication to key stakeholders

- Prepare and train designated spokesperson to communicate with external audiences.
- Maintain and update list of all facts.
- Revise and update key messages and talking points.
- Prioritize responses to external audiences.
- Assess need for additional resources.
- Receive briefings from field staff and technical experts.
- Brief key legislators and local government officials as applicable.
- Update the media as needed.
- Continue coordination with outside agencies as applicable.
- Determine when to conclude efforts; announce the conclusion to the news media.
- Prepare communication strategies for post-incident.

V. COMMUNICATION SYSTEMS

Several mediums can be used for communication with employees and external audiences during a crisis. Depending on the situation and the scale of the crisis, some methods may not be necessary. It is up to the discretion of the External Affairs Team in partnership with the Information Technology Department to determine which methods of communication to use. Available communication mediums include:

Communication Type	Used For	Issued By
Mass Internal Emails	Longer details of incident during/after crisis including instructions for employees not to talk to media and where to direct inquiries	External Affairs Team
Mass External Emails	Constant Contact: General Interest List, Stakeholders List, Media List: Information updates	External Affairs Team
AIM	Phone rosters and Media Contact Form	External Affairs Team / Program Managers and Supervisors

Microsoft Teams	Details of incident during/after crisis including instructions for employees not to talk to media unless designated to do so and where to direct inquiries	External Affairs Team / IT Support
Press Release	Information distribution during/after crisis to provide information affecting IEUA customers to the public and news media	External Affairs Team
Media Interviews	Broadcast messages through interviews with members of the media including radio platforms and podcasts.	External Affairs Team/Crisis Spokesperson
Press Conferences	Information distribution during/after crisis to provide information affecting IEUA customers to external audiences and news media	Senior Leadership Team/External Affairs Team/Crisis Spokesperson
Website	Agency fact sheets and press releases and IEUA Right Now landing page update	External Affairs Team
Social Media	Short initial description of crisis as soon as possible; updates on situation [Facebook, Instagram, X, Nextdoor, LinkedIn as applicable]	External Affairs Team
Other Website Pages	Press releases and information about the incident for the publication be found on Customer Agency sites as well as: • Federal Emergency Management Association (FEMA) http://www.fema.gov	Referrals from Staff

IEUA has authorized the use of Facebook, Instagram, X, LinkedIn, and Nextdoor for the distribution of information during a crisis. Only authorized members of IEUA's External Affairs Team may post to IEUA's social media sites and are responsible for developing relevant content.

In certain situations, IEUA may be called to participate in press interviews, conferences and/or public forums with other water agencies, City officials, County/State/Federal officials, and personnel. The External Affairs Team will provide tools and guidance to IEUA spokespersons, including the following:

- Preparing talking points and key messages to deliver during interviews
- Anticipating questions that IEUA spokespersons may be asked and preparing appropriate responses
- Highlighting resources and safety information

[Spokesperson preference given to those that have completed IEUA's Media Training.]

VI. KEY AUDIENCE CHECKLIST

When identifying a crisis, it is important to identify the intended audiences or influence in the crisis. This list can assist in selecting specific communications tactics to target the most relevant audiences.

Board of Directors	General Manager
Senior Leadership Team	Customer Agencies/PIOs
Employees	Employees' family members
Volunteers	Consultants
State/Federal elected officials, staff	Stakeholders
LinkedIn Followers	Partner agencies /PIOs
Contractors	Subcontractors
Vendors	Influencers/Advisors
Advocacy organizations	Local news media
Nextdoor Community	City elected officials, staff
Government regulators/funding agencies	Industry/trade association leadership
Instagram Followers	Environmental organizations
Facebook followers	Twitter followers
International news media	Trade/professional media
Ethnic/specialty media	Other

VII. FREQUENTLY ASKED QUESTIONS IN A CRISIS

In order to be better prepared, the following are samples of Frequently Asked Questions in a crisis.

Core Questions			
1.	What happened?		
2.	Who was impacted?		
3.	When did it happen?		
4.	Where did it happen?		
5.	Why did it happen?		
6.	What are you doing about it?		
Other Potential Questions			
7.	Was anyone harmed? Who?	**23.**	When did you find out?
8.	Are those that were harmed getting help? How?	**24.**	When did you respond?
9.	Are people out of danger?	**25.**	Does this affect resources? Water?
10.	Is the situation under control?	**26.**	Who is conducting the investigation?
11.	Has this ever happened before?	**27.**	What are you going to do after the investigation?
12.	What does this all mean?	**28.**	What have you found out so far?
13.	Who is in charge?	**29.**	Has anyone broken the law?
14.	What can we expect next?	**30.**	Has anyone made mistakes? Who?
15.	What are you advising people to do?	**31.**	Have you told us everything you know?
16.	When do you expect to resolve the situation?	**32.**	What are you not telling us?
17.	Who else is involved in the response?	**33.**	What effect will this have on your Agency, the region/service area, Customer Agencies, stakeholders, constituents, and/or the public?
18.	Did you have any forewarning that this might happen?	**34.**	Do you accept responsibility for what happened?
19.	Why didn't you prevent it from happening?	**35.**	Can this happen in another location?
20.	Could this have been avoided? How?	**36.**	What is the worst-case outcome of this crisis?
21.	What else could go wrong?	**37.**	What lessons did you learn?
22.	Who is to blame?	**38.**	What will you do to prevent this from happening again?

TEST AND UPDATE PLAN ANNUALLY: Regularly review, test, and update said Plan to incorporate lessons learned from previous incidents or exercises. Remain cognizant of emerging communications technologies and trends to enhance effectiveness of Communications Plan.

Each crisis may require tailored approaches, so flexibility and adaptability are crucial. This Plan is to aid in effectively managing communication during emergencies and help ensure external audiences' safety and confidence in IEUA.

APPENDIX A: KEY CONTACT LIST

Title	Name	Primary Phone Number	Email	Role
Director of External and Government Affairs	Alyson Piguee	909.247.8374	apiguee@ieua.org	PIO/Senior Leadership
Communications Officer	Andrea Carruthers	909.251.9519	acarruthers@ieua.org	PIO/External Affairs Team
General Manager	Shivaji Deshmukh	909.220.3020	sdeshmukh@ieua.org	General Manager/Senior Leadership
Deputy General Manager	Christiana Daisy	909.536.8483	cdaisy@ieua.org	Senior Leadership
Assistant General Manager	Kristine Day	909.247.9130	kday@ieua.org	Senior Leadership
Director of Engineering	Jerry Burke	909.313.9588	jburke@ieua.org	Senior Leadership
Director of Finance	Randy Lee	909.536.6857	rlee@ieua.org	Senior Leadership
Director of Human Resources	Lisa Dye	909.342.4667	ldye@ieua.org	Senior Leadership
Director of Information Technology	Don Hamlett	951.675.9879	dhamlett@ieua.org	Senior Leadership
Director of Operations and Maintenance	Robert Delgado	909.703.7807	rdelgado@ieua.org	Senior Leadership
Director of Planning and Resources	Michael Hurley	909.536.5772	mhurley@ieua.org	Senior Leadership
Director of Board and Administrative Services	Denise Garzaro	909.247.8142	dgarzaro@ieua.org	Senior Leadership
Safety Officer	Tony Arellano	909.536.5194	aarellano@ieua.org	Safety
Manager of Facilities and Water Systems Programs	Lucia Diaz	909.342.2365	ldiaz@ieua.org	Security / Collections

Manager of Operations	Scott Lening	951.295.7347	slening@ieua.org	Operations
City of Chino PIO	Matthew Bramlett	909.334.3304	mbramlett@cityofchino.org	PIO
City of Chino Hills PIO	Nicole Freeman	909.364.2609	nfreeman@chinohills.org	PIO
City of Fontana Communications and Marketing Manager	Monique Carter	909.350.6520	mcarter@fontanaca.gov	PIO
City of Montclair Director of Economic Development	Mikey Fuentes	909.625.9497	mfuentes@cityofmontclair.org	PIO
City of Ontario Communications and Community Relations Director	Dan Bell	909.395.2000	communications@ontarioca.gov	PIO
City of Upland Management Analyst II	Michelle Madriz	909.257.1061	mmadriz@uplandca.gov	PIO
Cucamonga Valley Water District Government and Public Affairs Manager	Eric Grubb	909.987.2591	ericg@cvwdwater.com	PIO
Fontana Water Company General Manager	Josh Swift	909.822.2201	jmswift@fontanawater.com	PIO
Monte Vista Water District Community Affairs Manager	Kelley Donaldson	909.267.2114	kdonaldson@mvwd.org	PIO
West Valley Water District Manager of Government and Legislative Affairs	Socorro Pantaleon	909.875.1804	spantaleon@wvwd.org	PIO
San Antonio Water Company	Teri Layton	909.982.4107	tleyton@sawaterco.com	Assistant General Manager

APPENDIX B: MESSAGE MAPPING

Message Mapping Steps

Definition
A message map provides an organized, prioritized repository of the information available to convey and support the messages external audiences need to hear, understand, and remember. Message maps also structure information essential for responding to external concerns.

Developing Message Maps
Developing the messages that will be released externally is very important. Here are six steps to follow when developing your crisis message maps:

Step 1 – Identify stakeholders: Stakeholders are interested, affected, or influential parties that would be or are currently affected by the situation.

Step 2 – Identify concerns: Develop a complete list of specific concerns for each relevant stakeholder group.

Step 3 – Identify underlying general concerns: Analyze all concerns to identify common sets of underlying general concerns. Most high concern issues are associated with no more than 15 to 25 primary underlying general concerns. Note: This should be done as time allows – initial messages or holding statements may need to be released before this step can take place.

Step 4 – Develop key messages: Messages should be in response to each stakeholder question, concern, or perception. Initial messages should address top of mind concerns, i.e., employees and stakeholder's safety/wellbeing, resources affected, what is being done, etc.

Step 5 – Develop supporting facts and proofs for each key message: Supporting facts provide the continuity and details needed to support the key message. Key messages should have no more than three supporting facts.

Step 6 – Plan for delivery: Prepare for the message maps' delivery through the appropriate communication channels.

Message Map Sheet

Scenario:

Stakeholder:

Concern:

Key Message 1 →	Key Message 2 →	Key Message 3

Support Point 1.1	Support Point 2.1	Support Point 3.1

Support Point 1.2	Support Point 2.2	Support Point 3.2

Support Point 1.3	Support Point 2.3	Support Point 3.3

APPENDIX C: CRISIS EMAIL TEMPLATES - INTERNAL

A. Earthquake

EMERGENCY EARTHQUAKE ALERT
A (magnitude) earthquake has just occurred with an epicenter at (location). We will provide updates as we receive more information.
During an earthquake, employees are reminded that:
If you are inside when shaking starts, **drop** to the ground, **cover** your head and neck, and **hold** on to any sturdy covering until the shaking stops.
If you are outside when shaking starts, move away from buildings, streetlights, and utility wires. Once in the open, **drop, cover,** and **hold**.
When the shaking stops, leave the building if you are able to. If you are trapped, do not move. Use a phone to call for help if you can. Be prepared to **drop**, **cover**, and **hold** again in the event of aftershocks.

B. Fire

EMERGENCY FIRE ALERT
A fire has been reported at (location), (address). If you are at (location), evacuate immediately. If you were supposed to report to (location), *do not report* there. Go to (new location). If you are not in the area, stay clear so that emergency units and firefighters can work unimpeded. Follow instructions from local authorities.

C. Active Shooter

EMERGENCY ACTIVE SHOOTER ALERT
There are reports of an armed suspect at (location).
In an active shooter situation, employees are reminded to:
Run- When an active shooter is in your vicinity.
Hide- If evacuation is not possible, find a place to hide.
Fight- As a last resort and only if your life is in danger.

If you were supposed to report to (location), *do not report there.* Go to (new location). Wait for the “all clear” notification from local authorities.

D. Flood

EMERGENCY FLOOD ALERT
(Affected location) is currently flooding. If you are in the area, seek higher ground immediately. If you were supposed to report to (location), *do not report* there. Go to (new location).

E. Flex Alert

FLEX ALERT NOTICE
The California Independent Systems Operator (Cal ISO) has issued a Flex Alert for today, (day of week), (date) from (beginning time) to (ending time).
In an effort to conserve energy and reduce IEUA's load on the power grid, all employees are requested to:
 Close window blinds
 Limit use of fans and other electronics
 Unplug personal electronics when not in use
 Turn off lights where possible
 Turn off lights when leaving work
 Turn off task lighting
 Turn off computer monitors before leaving work

As a matter of good practice during any high temperatures, employees are reminded to:
 Drink plenty of water
 Limit time outside during the day
 Wear light colored, light weight clothing
 Check on elderly and sick family and friends
 Check on children and ensure their exposure to heat is limited
 Keep pets indoors or in another cool place
 Never leave children or pets alone in a vehicle

F. Infrastructure Hazard (Sanitary Sewer Spill / Force Main Break / etc.)

A [name incident] has occurred on [date, time] at [location]. The incident has been categorized as a level [level number if applicable]. Mutual aid partners and those affected have been notified [if applicable]. Staff is onsite to evaluate and implement protocol to repair said incident. If you receive any external inquiries, please direct them to IEUA's Communications Officer, Andrea Carruthers at 909.251.9519 or acarruthers@ieua.org.

APPENDIX D: CRISIS EMAIL TEMPLATES - EXTERNAL

ACTIVE SHOOTER

As many may be aware, a mass shooting incident occurred at [Location and Time]. Multiple fatalities and casualties have been reported. [Location Description]. [Current Situation – Example: Police are reportedly still on the scene and currently investigating the incident]. [Direction to external audiences – Example: Those travelling to San Bernardino are advised to avoid the area at this time]. [Statement of Empathy – Example: We realize the current tragic situation with the active shooter in San Bernardino is unsettling to all of us. We would like you to review the attachment on how to best remain safe should you be involved in a similar event]. The Agency and those impacted are aware of this situation and will remain vigilant on alert.

Remember:

Run- When an active shooter is in your vicinity.
Hide- If evacuation is not possible, find a place to hide.
Fight- As a last resort and only if your life is in danger.

Your safety and security is our first priority. Remember, if you see something, say something. Call 911 or alert the nearest first responder. Take care.

SANITARY SEWER SPILL (Formerly Sewer System Overflow)

[Suggested Subject: URGENT NOTIFICATION: SANITARY SEWER SPILL IN (JURISDICTION)]
Dear [Stakeholder's Name/Title],

I hope this message finds you well. We regret to inform you of an incident that requires immediate attention. A sanitary sewer spill has occurred within your jurisdiction.

Incident Details:

- **Date and Time:** [Date and Time]
- **Location:** [Exact Location/Address]
- **Volume:** [Approximate Volume, if available]

Response Actions Taken: Our emergency response team is actively addressing the situation, and containment measures are in place to mitigate the impact. We are working closely with local authorities and environmental agencies to ensure a swift and effective response.

Next Steps: We understand the importance of transparent communication during such incidents. Regular updates will be provided as the situation develops, and we will collaborate closely with your team to minimize any potential impacts on the community.

Preventive Measures: In the meantime, we recommend residents and businesses in the affected area take the following precautions:

- Avoid contact with standing water.
- Refrain from using water fixtures connected to the affected sewer line.

- Report any unusual odors or discoloration to local authorities.

Community Outreach: To ensure comprehensive awareness, we will be disseminating information through local news outlets, social media, and community bulletins [Only include if relevant].

Contact Information: For any questions or concerns, please feel free to contact our dedicated hotline at [Emergency Contact Number] or respond directly to this email.

We deeply value our partnership with your jurisdiction, and we are committed to resolving this situation swiftly and transparently.

Your understanding and cooperation during this challenging time are greatly appreciated.

APPENDIX E: CRISIS NEWS RELEASE TEMPLATE

Holding Statement - to be used immediately after the first news of a crisis.
A (incident) occurred at (location) at (time) today. We are investigating the situation and will continue to provide information as it becomes available.

News Release
A (incident) occurred at (location) at (time) today, activating a comprehensive emergency response. Agency staff have diligently prepared for incidents of this nature.
(Number of people) have been (evacuated/injured/affected) in (area). (Agency/authorities which responded to the incident) (are currently working towards remediating the situation/have remediated the situation) by (action taken).
(There is an active warning in/the warning has been lifted for) (area) and people are advised (to stay away/evacuate/be alert) until further notice.

Hazard Sample Content:

The Inland Empire Utilities Agency has activated a comprehensive crisis response to manage this hazardous incident. Local officials have diligently prepared and trained to handle a disaster of this nature and all available resources are being mobilized to respond.
The top priority in a situation of this magnitude is the safety and security of our community members. As safety is assured, our next major priority is to protect the structures, facilities, and the environment which might be damaged as a result of this incident.
The spill/leak/detection [provide details] was reported to Agency staff by (911 call, private citizen, city employee, etc.) at approximately ___ PM/AM. Initial response to the incident by ____ consisted of _____ firefighters, ___ fire trucks/engines [if applicable]. There were no injuries reported OR persons, including (fire, police) personnel, were treated at local hospitals for _____ and (all, number) were later released. Those remaining in the hospitals are in _____ condition.

- Support from other agencies has come from: [List resources]
- The status of water, power, and other utilities is as follows:
- Roads closed include the following:
- Phone numbers/Web sites for the following include:
- General information:

APPENDIX F: AGENCY FACT SHEET

Linked here

APPENDIX G: MEDIA LOG

In a major crisis, it is likely to receive a barrage of media calls immediately and throughout the duration of the crisis. Usage of a media log will help to keep track of reporter/blogger inquiries, evaluate interview requests, and respond with consistent information.

Media Contact Form

Date	Time	Outlet	Name	Phone & Cell	Email	Questions

APPENDIX H: SPOKESPERSON GUIDELINES

Check with External Affairs Team Prior to Acting as Spokesperson

1. If selected to serve as the Spokesperson, please ensure you are the appropriate person to represent the Agency on the crisis and can serve as a subject matter expert.

2. Express compassion to those directly impacted by the crisis. Offer empathy messages first, before the facts.

3. If you're not sure who caused the crisis, say you are sorry that the incident occurred or apologize for the person's experience.

4. Think of messages as your quotes. Persuasive messages interpret, explain, and educate. Simplify complex information.

5. Take an active role in the interview. Ask the reporter for a quick overview before you begin. Make the first answer count to ensure you get your key points across.

6. Focus 100% on the interview. If you're on the phone with a reporter, remove all distractions. Have the Q&A or statement handy either in print, on your smart phone, tablet, or laptop. Jot down reporter questions to help you focus on what they are asking and how to respond.

7. Practice bridging to the information you want to convey. Briefly answer a negative or irrelevant question, then introduce or bridge to your message. Elaborate when asked positive questions. "Yes, that's correct, and what's more…" Provide brief answers to negative questions. Set the record straight when the reporter has his or her facts wrong. Say, "No, that is not correct, and let me explain."

8. Decline to speculate on the motives or actions of others. Politely say, "I wish I could help you, however you should contact them directly." Inform Communications Officer and person referenced of media contact and your response.

9. Don't feel obligated to answer every question on the spot. It's perfectly fine to say, "I don't know," versus risking the off-the-cuff answer that may turn out to be wrong. If you don't know the answer, say so. Add that you or someone from the organization will try to get back to them with the answer as soon as possible.

10. Do not use "no comment." If that cannot be avoided, explain "no comment" answers. Give a reason why you cannot comment, either because of confidentiality, litigation or because police, fire or other authority has requested that you refer questions to them.

11. Never say anything "off the record." The reporter could inadvertently use your comment, or your "anonymous" quote could be traced back to you.

12. Stay on topic/brand. Even if the reporter uses an accusatory tone or is rude, remember that it's often an act to get you to react. Don't take it personally. In 99% of the time, no one will read or hear the questions. If the reporter persists in using a hostile tone, consider ending the interview and suggest talking at a later time.

13. The toughest rule for most people to follow… and the most important… is to stop and think before answering questions. It only takes a few seconds to shape a quote that will be on the record indefinitely.

APPENDIX I: JOINT INFORMATION CENTER (JIC) ACTIVATION

A JIC can act as a component of an EOC when activated.

When an event occurs that requires activation of an Emergency Operations Center (EOC) or more than one organization to respond, a JIC should be activated. The decision by the PIO supporting incident command to activate the JIC is based on the complexity of the situation and the need to ensure coordination and integration of messages.

Public information functions must be coordinated and integrated across jurisdictions and across functional agencies; among Federal, State, and local partners; and with private-sector and nongovernmental organizations.

In an emergency, the JIC provides the mechanism for integrating public information activities to ensure coordinated and consistent message development, verification, and dissemination.

Coordinated and Consistent Messages
Through the JIC, all participating PIOs will work together to create coordinated and consistent messages by collaborating to:

- Identify key information that needs to be communicated externally.
- Craft messages that convey key information and are easily understood.
- Prioritize messages.
- Verify accuracy of information through appropriate channels, including incident command and relevant agencies and program areas.
- Disseminate messages using the most effective means available.

.

Principle of Autonomy
Organizations participating in incident management retain their autonomy. The departments, agencies, organizations, or jurisdictions that contribute to the JIC do not lose their individual identities or responsibility for their own programs or policies. Each relevant agency should provide a spokesperson and/or contribute to the message and information being disseminated. Agencies may issue their own releases related to their policies, procedures, programs, and capabilities; however, these should be coordinated with the incident specific JIC(s).

JIC Operation
The JIC can be formed at a central location that facilitates effective operations, or it can be a “virtual” location where PIOs are connected via phone, Microsoft Teams, website, or other formal or informal method. It should be a system that supports the unique needs of each group handling a particular incident. The goal of the JIC is to allow personnel with public information responsibilities to perform critical emergency information functions, incident communication, and public information functions. The JIC is also the central point of information for all news media.

NOTE: Once it is determined that media outlets (print or broadcast) have or will be converging to cover an incident, a media briefing location should be established. The purpose of the location is to provide a single place at which the media can receive regular information, conduct interviews, write their stories, file stories and congregate while awaiting updated information. The media briefing location shall be in an area with adequate parking and shelter, electricity, wireless Internet access, a backdrop for one-on-one interviews, and can meet other media-related needs.

Demobilizing the JIC

When operational activities begin to decline, the JIC will begin to transfer public information functions back to responsible jurisdictions and agencies. The decision to transition the JIC will be made by the incident commander in consultation with the lead PIO and other Section Chiefs. Media will be notified that the functions of the JIC are being transferred back to regional and local PIOs.

APPENDIX J: SAMPLE TALKING POINTS

Sewer System Spills

- **If there is a spill, how does IEUA mitigate?**
    - IEUA performs scheduled preventative maintenance on areas in the system prone to grease or rags in an effort to prevent any disruption in service.
    - In the event of a Spill, our priority is to secure the area, contain any runoff, and work to return the sewer system to normal operation as quickly as possible while minimizing the impact on the community.
    - Staff are fully equipped with Spill Kits provided by the Lab to collect any samples that may contain spillage from our treatment plants.

- **If there is a spill during inclement weather conditions (i.e., recent storm event), how does IEUA mitigate?**
    - Heavy rain can impact the sewer system by increasing flows which can dislodge objects and wash excessive debris into the system.
    - Storm events also increase the safety risk to field staff who must work in these wet conditions, often in the streets and dealing with traffic conditions.
    - During inclement weather conditions, such as storm events, IEUA takes additional measures to have staff available to respond to an event should one occur, and arrangements are made to have staff on site 24/7 if necessary.
    - If there is a spill during a rain event, precautions are taken to ensure staff safety remains a top priority while working to contain and address the issue.
- **How does IEUA mitigate spills in anticipation of inclement weather (i.e., any measures taken to prepare for such events)?**
    - IEUA prepares for storm events by performing inspections on areas identified as needing additional attention.
    - IEUA will also accelerate our cleaning schedule to service sections of pipes where grease and rags frequently accumulate to ensure those sections are working at full capacity prior to the storm.
- **What general measures does IEUA take to mitigate spills?**
    - Staff oversee a continuous cleaning program that ensures the entire system is cleaned every five years, while also attending to specific areas that need more maintenance on a recurring schedule - weather that be monthly or quarterly.

- IEUA also has installed *SmartCover* units throughout the system, which are remote monitoring devices that will notify us if there is a change in flow level or an abrupt stoppage. This gives our Operators time to respond and address the issue, hopefully before a spill occurs.

- IEUA's communication efforts promote reduced water use by the community during rain events to reduce the impact on conveyance systems and treatment plants, which must continue to operate as designed to prevent any service disruptions.

- The Water Quality Lab is always prepared to analyze spill samples to ensure compliance. If spills occur, the Lab is also ready to test not only the compliance parameters but also priority pollutant parameters.

Natural Disasters

- **What measures are taken to ensure operations run as efficiently as possible immediately following a natural disaster?**

    - Operations staff are always on standby to ensure the integrity of our treatment plants in case of an emergency or natural disaster such as a heavy storm event or earthquake.

    - In recent storm and earthquake events, Operations staff has been called in to work overnight to tend to the plants.

Weather Extremes and Drought

- California is vulnerable to extreme and variable weather. We have to continually adapt how we manage, plan and invest in our water systems for long term resiliency.

- As our State continues to prepare for a hotter, drier future, Californians need to continue to use water wisely and efficiently so that we can have thriving communities and a healthy economy and environment.

- With climate change and frequent droughts, management of our service area's water resources is increasingly challenging. We must continue to wisely manage all of the region's water supplies and invest in storage and infrastructure to be ready to respond in the next inevitable dry period.

SWP Dependent and Colorado River Explanation

- MWD provides imported water from the State Water Project (SWP) and Colorado River.

- IEUA has a diverse water supply portfolio. Imported water supplies, however, come exclusively from the SWP:
    - Approximately thirty percent of IEUA's water supplies are imported water from the SWP.
    - Due to the Total Dissolved Solids (TDS ---- the amount of organic and inorganic materials, such as metals, minerals, salts, and ions, dissolved in a particular volume of water) levels of the Colorado River, IEUA cannot receive this water.
        - IEUA is not connected to a system to receive Colorado River water – the Agency has not been connected for over 20 years.
            - This action is tied to IEUA's water quality permits and objectives, which require IEUA to stay below mandated TDS limits.

- This water cannot be blended with groundwater supplies due to the Chino Groundwater Basin's TDS levels.
- State Water Project water has lower TDS levels which allow for blending with our groundwater supplies.
- IEUA could reconnect, but to use this imported water supply, the Agency would first need to construct facilities for Reverse Osmosis or similar treatment processes to remove the salt in the water.

IEUA ACTIONS & PROGRAMS TO ADDRESS DROUGHT and WATER-USE EFFICIENCY

- IEUA has a diverse water supply portfolio-- Approximately 70% of the water supplies in the IEUA region are from local sources and continue to be developed to increase regional drought resiliency.

- Climate change and drought are ongoing crises throughout the State and the nation. IEUA, its Board, and customer agencies are constantly collaborating and pursuing projects and initiatives that increase resiliency within the region, regardless of dire conditions.

- Preparing for the State's drought conditions and changing climate, IEUA's Board continues to make great strides investing in a diverse water portfolio and in critical projects such as the ongoing expansion of Regional Water Recycling Plant No. 5 and the Chino Basin Program.
  - Addressing significant growth in the region, the RP-5 Expansion Project will expand the liquids treatment capacity to 22.5 million gallons per day (MGD), which provides recycled water treated to the State's highest standards that can be added to the groundwater basin.
  - Chino Basin Program
    - The Chino Basin Program addresses local water quality and compliance needs to support development, local resiliency, continued growth in the region, operational flexibility, and reliability.
    - The advanced treated water is essential to reducing salinity and protecting the water quality of the Chino Basin.
    - Regional Benefits: Local investments in infrastructure for local reliability; will provide 300,000 acre-feet of water for local use over the next 25 years; and will generate drought resilient water supply to meet critical needs.

- Collaboration is key. IEUA appreciates the collaboration between its customer agencies to ensure that the urgency of this situation is conveyed in a unified, impactful manner.
  - IEUA is working to provide resources to foster this collaboration. The Agency recognizes that a "one-size-fits-all" approach is not feasible and relies on the efforts of our customer agencies to implement water saving measures and communicate water-efficiency messaging to their audience in a way that resonates the most.

- IEUA has resources on its website with tips and a portfolio of programs to aid in using water wisely. IEUA's message states **"The Time is ALWAYS Now" to take action to increase water saving efforts.**
  - The time is always now to know the facts.
  - The time is always now to change your habits.
  - The time is always now to step it up and save water.
    - Take your car to the car wash, or if you choose to wash at home, be sure to use a self-closing hose nozzle.
    - Landscape your yard with low water use plants.
    - Keep showers to five minutes or fewer.
    - Clean sidewalks and driveways with a broom, rather than a hose.
    - Turn off the faucet while brushing your teeth.

        - Repair leaky faucets and toilets or replace them with more efficient equipment.
            - Leaking flapper valves in toilets can result in surprisingly large amounts of water going down the drain costing a lot of money on your water bill.
            - Save money & water by fixing that leaky flapper valve right away!
        - Only run washing machines and dishwashers when they are completely full.
        - Water only in the early morning before the sun comes up and restrict watering to your water provider's guidelines.

- As the Inland Empire region continues to grow, future water supply reliability will depend on innovative local supply programs and enhanced water-use efficiency.
    - The Agency offers water-use efficiency and rebate programs to help residents save water in and around their homes, many available at no-cost to our residents.
        - The Agency continues to add incentives to promoting SoCalWaterSmart.com water conservation device rebates as well as water-use efficiency programs.
        - In providing such programs, IEUA and its customer agencies help ensure that members of our service area have options provided to them to increase water efficiency inside and outside the household.
        - Inland Empire customers should go to the website of their local water provider for more information about how to sign up to participate in these water conservation programs.

- As California experiences drought conditions, maximizing water-use efficiency efforts will help maintain a reliable, high-quality water supply today, tomorrow, and for future generations.
    - The Agency recognizes that drought and dry conditions affect everyone, but ANYONE can save water. Whether large or small- these actions make a difference.

- Talking about Turf!
    - Did you know that landscape irrigation accounts for up to 60-70% of home water use?
    - Did you know that it takes over six feet of water per year to keep most types of turf sufficiently irrigated in the Inland Empire?
    - That's a lot of water when you consider that the Inland Empire typically gets only 16 inches of water in rainfall each year.
    - If you've been thinking about transitioning some or all of your turf to low-water-using plants and need some ideas, check out this great online planning tool for designing beautiful landscapes at www.ie.watersavingplants.com – it's completely free to use and showcases plants that will thrive in the Inland Empire with little water!

APPENDIX K: AFTER HOURS EMERGENCY CONTACTS

After Hours Emergency Contacts					
Local City	Regular Hours	After Hours	Police		
Chino	(909) 334-3265	(909) 628-1234	(909) 334-3000		
Chino Hills	(909) 364-261	(909) 364-2860	(909) 364-2000		
Fontana	(909) 350-6750	(909) 350-7700	(909) 350-7700		
Ontario	(909) 395-2800	(909) 395-2001	(909) 395-2001		
Montclair	(909) 625-9480	(909) 621-4771	(909) 621-4771		
Rancho Cucamonga	(909) 477-2730	(909) 477-2800	(909) 477-2800		
Upland	(909) 291-2930	(909) 946-7624	(909) 946-7624		
Water Agency	Regular Hours	After Hours	Police	Production Standby	After Hours Alternate
Cucamonga Valley Water District	(855) 654-2893	(855) 654-2893	(909) 477-2800	(909) 236-5515	
Fontana Water Company	(909) 822-2201	(909) 428-8746	(909) 350-7700		
Metropolitan Water District	(626) 844-5610	(626) 844-5610	(213) 473-3231		(626) 844-5608
Monte Vista Water District	(909) 624-0035	(909) 624-0035	(909) 621-4771		

APPENDIX 12

12.1. SSMP Effectiveness Assessment Worksheet

SSMP Effectiveness Worksheet

CONTENTS

ELEMENT 1 – INTRODUCTION AND GOALS

ELEMENT 1			
No.	**Assessment Criteria**	**Yes**	**No**
1.1	None	☐	☐
1.2	Are SSMP Audits and SSMP Updates being performed as scheduled?	☐	☐
1.2	Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)?	☐	☐
1.2	Are specific internally established sewer program milestones being monitored?	☐	☐
1.3	Are asset statistics periodically reviewed and updated as necessary?	☐	☐
1.3	Are corrections addressed in a timely manner?	☐	☐
1.3	Are system maps up to date?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 2 – ORGANIZATION

ELEMENT 3			
No.	**Assessment Criteria**	**Yes**	**No**
2.0	Have there been any changes requiring updates to the Organizational Chart?	☐	☐
2.0	Have there been instances when a service call for a spill was not properly routed to response personnel?	☐	☐
2.0	Were all spill response activities documented and forwarded to the LRO?	☐	☐
2.0	Have there been any changes in assigned responsibilities for implementing the Sewer System Management Plan?	☐	☐
2.0	Is there a process in place to ensure all contact information remains up to date?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 3 – LEGAL AUTHORITY

ELEMENT 3			
No.	**Assessment Criteria**	**Yes**	**No**
3.0	Are the Agency ordinances and standards adequate for fulfilling the Sewer System Management Plan legal requirements?	☐	☐
3.0	Does the Agency have a process in place for periodic review and evaluation of ordinances?	☐	☐
3.0	Have there been instances when the code or ordinance did not address a need or circumstance?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 4 – OPERATIONS AND MAINTENANCE

ELEMENT 4			
No.	**Assessment Criteria**	**Yes**	**No**
4.1	Were all map updates completed in a timely manner?	☐	☐
4.1	Are all staff trained in the procedure for providing map update information?	☐	☐
4.1	Are newly installed sewer assets incorporated into the system maps?	☐	☐
4.1	Are there terrain features or assets that should be incorporated in future map updates (e.g. exposed pipe, siphons, ARVs, surface water, etc.)	☐	☐
4.2	Is the agency's maintenance, operations, engineering work orders periodically audited for accuracy and completeness?	☐	☐
4.2	Does the agency monitor "open," "overdue," or "not yet completed" work orders to ensure completion of tasks?	☐	☐
4.2	Are inspection and maintenance activities reducing the number and volume of spills?	☐	☐
4.2	Is maintenance work being completed as scheduled?	☐	☐
4.3	Has all training been completed as scheduled?	☐	☐
4.3	Have records of training and attendance been documented and maintained?	☐	☐
4.3	Have all staff demonstrated ability and knowledge after each training event?	☐	☐
4.3	Have contractors received, at a minimum, direction for reporting and responding to spills.	☐	☐
4.4	Have inventory lists been audited as scheduled?	☐	☐
4.4	Have any inventory deficiencies or omissions been discovered and rectified?	☐	☐
4.4	Has the agency experienced any equipment failure that inhibited a spill response?	☐	☐
Comments			

ELEMENT 4	
Corrections	
Reviewed By	
Approved By	

ELEMENT 5 – DESIGN AND PERFORMANCE PROVISIONS

ELEMENT 5			
No.	**Assessment Criteria**	**Yes**	**No**
5.1	Are the Agency ordinances and standards adequate for fulfilling the Sewer System Management Plan legal requirements?	☐	☐
5.2	Were any design or installation deficiencies found during warranty inspections?	☐	☐
5.2	Are deviations from standard procedures and/or specs, testing, etc., justified and documented?	☐	☐
5.2	Does the Agency stay abreast of industry design standards and technical advances in the industry?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 6 – ELEMENT 6 – SPILL EMERGENCY RESPONSE PLAN

ELEMENT 6			
No.	**Assessment Criteria**	**Yes**	**No**
6.0	Have staff spill response efforts helped to prevent the discharge of sewage to surface waters?	☐	☐
6.0	Do post-spill assessments indicate staff are following the procedures outlined in the SERP?	☐	☐
6.0	Is SERP training effective and trainees demonstrating adequate knowledge and abilities?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 7 – SEWER PIPE BLOCKAGE PROGRAM

ELEMENT 7			
No.	**Assessment Criteria**	**Yes**	**No**
7.0	Have there been any blockages/spills from any identified problem area?	☐	☐
7.0	Is the agency receiving feedback on public outreach efforts?	☐	☐
7.0	Is the debris and other sewage solids collected during cleaning activities being disposed of appropriately?	☐	☐
7.0	Have there been spills due to excessive fats, oil, grease, roots, or non-dispersible wipes discovered in the sewer system during the audit period?	☐	☐
7.0	Are there repeat offenders among FSEs?	☐	☐
7.0	Are enforcement trends decreasing?	☐	☐
7.0	Are Source Control and Collection staff included in the plan check process?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 8 – SYSTEM EVALUATION, CAPACITY ASSURANCE, CAPTIAL IMPROVEMENTS

ELEMENT 8			
No.	**Assessment Criteria**	**Yes**	**No**
8.1	Has the Agency maintained its schedule for CCTV inspections and is data being reviewed in a timely manner.	☐	☐
8.2	Number of capacity-related spills or surcharge condition during the audit period?	☐	☐
8.2	Has the system responded to rain events as indicated by the hydraulic model?	☐	☐
8.2	Has there been any changes to zoning designations (residential, commercial, industrial)?	☐	☐
8.3	Has the Agency adhered to its system evaluation/condition assessment schedule?	☐	☐
8.3	Has the Agency adhered to its prioritization/corrective procedures for sewer repair and capacity improvement projects?	☐	☐
8.3	Have projects been completed before deficiencies caused failures?	☐	☐
8.4	Has the agency's capital improvement plan schedule been adhered to?	☐	☐
8.4	Have there been any instances when a failure or service disruption occurred that would have been prevented if a project been completed?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 9 – MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

ELEMENT 9			
No.	**Assessment Criteria**	**Yes**	**No**
9.0	Are SSMP Elements being periodically evaluated for effectiveness?	☐	☐
9.0	Are work activities and spill events being documented?	☐	☐
9.0	Has a plan and schedule been established to address audit findings/deficiencies from the last audit?	☐	☐
9.0	Is Trend Analysis being performed on spill causes?	☐	☐
9.0	Have work programs been assessed and updated as necessary?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 10 – INTERNAL AUDITS

ELEMENT 10			
No.	**Assessment Criteria**	**Yes**	**No**
10.0	Have audits been performed as required?	☐	☐
10.0	Have the audits assessed compliance, implementation, and effectiveness?	☐	☐
10.0	Have deficiencies been identified?	☐	☐
10.0	Has a plan and schedule to rectify the deficiencies been established?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

ELEMENT 11 – COMMUNICATIONS PROGRAM

ELEMENT 11			
No.	**Assessment Criteria**	**Yes**	**No**
11.0	Does the agency place all Sewer System Management Plan action items on the agenda for regular counsel/board meetings?	☐	☐
11.0	Does the agency have signage, or other means, readily available to notify the public of environmental or public risk factors related to a sewage spill?	☐	☐
11.0	Does the agency perform outreach to residential customers?	☐	☐
Comments			
Corrections			
Reviewed By			
Approved By			

