

RESOLUTION NO. 2025-44

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE
SAN MIGUEL COMMUNITY SERVICES DISTRICT APPROVING THE AUDIT
REPORT AND UPDATE TO THE DISTRICT'S SANITARY SEWER MANAGEMENT
PLAN (SSMP)**

WHEREAS, San Miguel Community Services District (“District”) has the responsibility to maintain and manage the communities public sanitary sewer collection system; and

WHEREAS, On May 2, 2006, the SWRCB adopted Water Quality Order No. 2006-0003-DWQ (herein after General WDR), requiring all public wastewater collection system agencies in California with greater than one mile of sewers to be regulated under this General WDR.; and

WHEREAS, the current SSMP was adopted by the District at the June 2018 SMCSD Board Meeting. As part of the SSMP, the District is required to conduct periodic internal audits. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the District's compliance with the SSMP requirements including identification of any deficiencies in the SSMP and steps to correct them. The District is required to report the results of the audits, along with recommendations and suggested improvements, to the RWQCB in its annual reports. Updates for the District's SSMP should be completed as needed. The last SSMP Audit of the SSMP was completed in 2022; and

WHEREAS, the District Board of Directors authorized a contract with Engineered Utility Solutions (EUS) to prepare an audit of the existing SSMP and update the plan as required to meet current regulatory requirements; and

WHEREAS, EUS completed the audit of the existing SSMP and prepared a 2025 update of the subject plan as required by the SWRCB. The subject plan and audit have been reviewed by District staff and District Engineer and hereby recommended for approval by the District Board.

NOW THEREFORE, BE IT RESOLVED, the Board does, hereby:.

1. Accept and approve the audit of the existing SSMP, prepared by Engineered Utility Solutions (EUS); and
2. Adopt the updated SSMP, prepared by Engineered Utility Solutions (EUS).

Signatures on next page

On the motion of Director Sangster, seconded by Director Beatty and on the following roll call vote, to wit:

AYES: Beatty, Davis, Sangster

NOES: 0

ABSENT: Smiley

ABSTAINING: 0

VACANCY: 1

the foregoing Resolution is hereby passed and adopted this 18th day of December 2025.



Kelly Dodds, General Manager



Ashley Sangster, Board President




ATTEST:

APPROVED AS TO FORM:



Tamara Parent, Board Clerk



Christina M. Pritchard, Deputy General Counsel

2025



San Miguel Community Services District (SMCSD)
Spill Emergency Response Plan (SERP)

CS Name: San Miguel CSD CS
WDID: 3SSOO10321
Date of Completion: 11/1/2025



ENGINEERED UTILITY SOLUTIONS, LLC



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Introduction

The purpose of the Spill Emergency Response Plan is to ensure prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The successful implementation of this Spill Emergency Response Plan will minimize the impact of spills to the public and the environment. This Spill Emergency Response Plan will be the guideline for the standard operating procedures in the event of a Spill. The Spill Emergency Response Plan will be reviewed annually and as needed to ensure that all corrective measures are being taken. For the remainder of this document the “SERP” acronym shall take the place of the Spill Emergency Response Plan. For the remainder of this document the “SMCSD” acronym or “District” shall take the place of the San Miguel Community Services District.

The SMCSD is a member of Region 3 (Central Coast) Regional Water Quality Control Board

- ❖ Region 3 Email: CentralCoast@waterboards.ca.gov
- ❖ Region 3 Phone: (805) 549-3147.

The SMCSD’s Spill Emergency Response Goals Include the following:

1. Perform all spill response tasks in a safe manner.
2. Respond efficiently to reduce the volume of the spill.
3. Remove the cause of the spill.
4. Contain the spill.
5. Gather as much information as possible from the person reporting the spill.
6. Prevent spills from entering storm drain systems and waters of the United States.
7. Reduce public contact with spills.
8. Control the impact of a spill.
9. Restore system capacity and condition as soon as possible.
10. Comply with all regulatory reporting requirements.

Commitment to Safety:

The General Manager will ensure that District staff responding to a spill event are familiar with potential safety hazards associated with sewer work. Training regarding to blood-borne pathogens, confined space safety, hazardous waste handling procedures, fall protection, traffic safety, and documenting additional training topics.

The District will provide training for all District staff to discuss: safety issues, work procedures, and inspection of safety equipment before starting the job. Additionally, tailgate safety meetings are held every 10 working days as required by Cal/OSHA Title 8 California Code of Regulation 1509e.



Required Procedures

SMCSD SERP includes up to date information, ensuring prompt detection and response to spills to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan also includes procedures for:

- ❖ Notification - 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;
- ❖ Compliance - Comply with the notification, monitoring and reporting requirements of General Order WQ 2022-0103-DWQ, State law and regulations, and applicable Regional Water Board Orders; Document and report spill events as required in General Order WQ 2022-0103-DWQ;
- ❖ Implementation - Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained; SMCSD to address emergency system operations, traffic control and other necessary response activities;
- ❖ Containment - Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;
- ❖ Remediation - 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;
- ❖ Proactive Approach - Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;
- ❖ External Coordination - Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;
- ❖ Internal Analysis - Conduct post-spill assessments of spill response activities;
- ❖ Annual Assessment - Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.



Notification Procedures

SMCSD Notifies primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner; SMCSD Notifies other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;

SMCSD maintains a 30-minute response time for all reported sewer emergencies

Spills are reported to the District in one of three ways:

- 1. Incoming call to the District:**
 - Regular Business Hours - (805) 467-3300
 - After-Hours Sewer/Water Emergencies - (805) 226-2102
- 2. Incoming call from the County Sheriff/County Health/Regional Water Board:**
 - County Sheriff's Office North Station – (805) 434-4290
 - County Health Services – (805) 781-5544
 - Region 3 Water Board – (805) 549-3147 or CentralCoast@waterboards.ca.gov
- 3. District staff calls in and reports an observation while in the field.**

All calls are immediately reported to the General Manager.

The General Manager (LRO) will begin to fill out an internal spill response report and will either act as Primary Responder to the spill or delegates the Primary Responder duties to another available District staff.

A Primary Responder is then dispatched to the site of the reported spill.

The Primary Responder is responsible for assessing the spill as well assisting the General Manager in notification and reporting procedures to the following agencies:

- **Notification of local officials.**
- **Notification to appropriate regulatory agencies:**
 - California Office of Emergency Services – (800) 852-7550 (**within 2 hours**)
 - County Health Services – (805) 781-5544 (**within 2 hours**)
 - Region 3 Water Board – (805) 549-3147 (**within 2 hours**)
- **Notification of additional potentially affected entities:**
 - CA Department of Fish and Game – Region 4 (559) 243-4005 (as necessary)
 - San Luis Obispo County Agriculture – (805) 781-5910 (as necessary)
 - The local water supplier is SMCSD.

For more details, please see the Appendix Sections.



Regulatory Compliance

SMCSD complies with the notification, monitoring and reporting requirements of General Order WQ 2022-0103-DWQ, State law and regulations, and applicable Regional Water Board Orders by adhering to the following requirements for notification, monitoring and reporting;

The following compliance and reporting will be adhered to per WQ 2022-0103-DWQ.

Spill Category 1: Spills to Surface Waters

Spill Requirement	Due	Method
Notification	<p>Within two (2) hours of the Enrollee's knowledge of a Category 1 spill of 1,000 gallons or greater, discharging or threatening to discharge to surface waters:</p> <p>Notify the California Office of Emergency Services and obtain a notification control number.</p>	<p>California Office of Emergency Services at: (800) 852-7550</p> <p>(Section 1 of Attachment E1)</p>
Monitoring	<ul style="list-style-type: none"> Conduct spill-specific monitoring; Conduct water quality sampling of the receiving water within 18 hours of initial knowledge of spill of 50,000 gallons or greater to surface waters. 	(Section 2 of Attachment E1)
Reporting	<ul style="list-style-type: none"> Submit Draft Spill Report within three (3) business days of the Enrollee's knowledge of the spill; Submit Certified Spill Report within 15 calendar days of the spill end date; Submit Technical Report within 45 calendar days after the spill end date for a Category 1 spill in which 50,000 gallons or greater discharged to surface waters; and Submit Amended Spill Report within 90 calendar days after the spill end date. 	(Section 3.1 of Attachment E1)

Spill Category 2: Spills of 1,000 Gallons or Greater That Do Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	<p>Within two (2) hours of the Enrollee's knowledge of a Category 2 spill of 1,000 gallons or greater, discharging or threatening to discharge to waters of the State:</p> <p>Notify California Office of Emergency Services and obtain a notification control number.</p>	<p>California Office of Emergency Services at: (800) 852-7550</p> <p>(Section 1 of Attachment E1)</p>
Monitoring	Conduct spill-specific monitoring.	(Section 2 of Attachment E1)
Reporting	<ul style="list-style-type: none"> Submit Draft Spill Report within three (3) business days of the Enrollee's knowledge of the spill; Submit Certified Spill Report within 15 calendar days of the spill end date; and Submit Amended Spill Report within 90 calendar days after the spill end date. 	(Section 3.2 of Attachment E1)



Spill Category 3: Spills of Equal or Greater than 50 Gallons and Less than 1,000 Gallons That Does Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	Not Applicable	Not Applicable
Monitoring	Conduct spill-specific monitoring.	(Section 2 of Attachment E1)
Reporting	<ul style="list-style-type: none"> Submit monthly Certified Spill Report to the online CIWQS Sanitary Sewer System Database within 30 calendars days after the end of the month in which the spills occur; and Submit Amended Spill Reports within 90 calendar days after the Certified Spill Report due date. 	(Section 3.3 and 3.5 of Attachment E1)

Spill Category 4: Spills Less Than 50 Gallons That Do Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	Not Applicable	Not Applicable
Monitoring	Conduct spill-specific monitoring.	(Section 2 of Attachment E1)
Reporting	<ul style="list-style-type: none"> If, during any calendar month, Category 4 spills occur, certify monthly, the estimated total spill volume exiting the sanitary sewer system, and the total number of all Category 4 spills into the online CIWQS Sanitary Sewer System Database, within 30 days after the end of the calendar month in which the spills occurred. Upload and certify a report, in an acceptable digital format, of all Category 4 spills to the online CIWQS Sanitary Sewer System Database, by February 1st after the end of the calendar year in which the spills occur. 	(Section 3.4, 3.6, 3.7 and 4.4 of Attachment E1)

Enrollee Owned and/or Operated Lateral Spills That Do Not Discharge to Surface Waters

Spill Requirements	Due	Method
Notification	<p>Within two (2) hours of the Enrollee's knowledge of a spill of 1,000 gallons or greater, from an enrollee-owned and/or operated lateral, discharging or threatening to discharge to waters of the State:</p> <p>Notify California Office of Emergency Services and obtain a notification control number.</p> <p>Not applicable to a spill of less than 1,000 gallons.</p>	<p>California Office of Emergency Services at: (800) 852-7550</p> <p>(Section 1 of Attachment E1)</p>
Monitoring	Conduct visual monitoring.	(Section 2 of Attachment E1)
Reporting	<ul style="list-style-type: none"> Upload and certify a report, in an acceptable digital format, of all lateral spills (that do not discharge to a surface water) to the online CIWQS Sanitary Sewer System Database, by February 1st after the end of the calendar year in which the spills occur. Report a lateral spill of any volume that discharges to a surface water as a Category 1 spill. 	(Sections 3.6, 3.7 and 4.4 of Attachment E1)



Reporting Requirements for Draft Spill Report for Category 1 and 2 Spill

Within three (3) business days of the Enrollee's knowledge of a Category 1 or Category 2 spill, the Enrollee shall submit a Draft Spill Report to the online CIWQS Sanitary Sewer System Database. The Draft Spill Report must, at minimum, include the following items:

1. Contact information: Name and telephone number of Enrollee contact person to respond to spill-specific questions
2. Spill location name
3. Location of the spill event including GPS coordinates of known spill boundaries:
 - a. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the spill appearance point explanation field
4. Did the spill reach a drainage conveyance system? If Yes:
 - a. Description of the drainage conveyance system transporting the spill
 - b. The total spill volume fully recovered within the drainage system
5. Did the spill directly or indirectly (via a drainage conveyance system) discharge into:
 - a. A water of the United States for a Category 1 spill, or
 - b. A water of the State that are not waters of the United States, for a Category 2 spill
6. Description and GPS coordinates of all discharge point(s), as applicable
7. Estimate of total spill volume, inclusive of all discharge point(s)
8. Estimate of the spill volume that discharged to waters of the State, and spill volume not recovered from a drainage conveyance system
9. Estimate of the spill volume recovered (if applicable)
10. Spill appearance point(s), including:
 - a. Number of appearance points
 - b. Description of spill appearance point(s)
 - c. Location including GPS coordinates of each spill appearance point (or attach a sketch to illustrate the geographic location(s) of each spill appearance point), and
 - d. If a single sanitary sewer system failure results in multiple spill appearance locations, each appearance point must be described
11. Spill start date and time
12. Date and time the Enrollee was notified of, or self-discovered, the spill
13. Estimated operator arrival time
14. For Category 1 spills requiring California Office of Emergency Services notification:
 - a. The date and time the Enrollee notified California Office of Emergency Services
 - b. The California Office of Emergency Services control number



Certified Spill Report for Category 1 and Category 2 Spills

Within 15 calendar days of the spill end date, the Enrollee shall submit a Certified Spill Report for Category 1 and/or Category 2 spills, to the online CIWQS Sanitary Sewer System Database (<https://ciwqs.waterboards.ca.gov>). Upon completion of Certified Spill Report, the online CIWQS Sanitary Sewer System Database will issue a final spill event identification number.

The Certified Spill Report must, at minimum, include the following mandatory information in addition to all information in the Draft Spill Report per section 3.1.1. (Draft Spill Report for Category 1 and Draft Category 2 Spill) above:

1. Description of the spill event destination(s) including GPS coordinates that represent the full spread of the spill;
2. Spill end date and time;
3. Description of how the spill volume estimations were calculated, including at a minimum:
 - a. The methodology, assumptions and type of data relied upon, such as supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered), and
 - b. The methodology(ies), assumptions and type of data relied upon for estimation of the spill start time and the spill end time;
4. Spill cause(s) (for example, root intrusion, grease deposition, etc.);
5. System failure location (for example, main, lateral, pump station, etc.);
6. Whether or not the spill was associated with a storm event;
7. Description of spill response activities including description of immediate spill containment and cleanup efforts;
8. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the spill, and a schedule of major milestone for those steps;
9. Spill response completion date;
10. Whether or not there is an investigation. If yes, detailed narrative of investigation and investigation findings of cause of spill;
11. Reasons for an ongoing investigation (as applicable) and the expected date of completion;
12. Name and type of water body(s) impacted:
 - a. Public closure, restricted public access, temporary restricted use, and/or posted health warnings due to spill,
 - b. Responsible entity for closing/restricting use of water body, and
 - c. Number of days closed/restricted as a result of the spill.

For Category 1 Spills only: If water quality samples were collected, identify parameters the water quality samples were analyzed for. If no samples were taken, NA shall be selected.



Spill Technical Report for Category 1 Spill of 50,000 Gallons or Greater

For any spill with 50,000 gallons or greater discharged into a water of the United States, within 45 calendar days of the spill end date, the Enrollee shall submit a Spill Technical Report to the online CIWQS Sanitary Sewer System Database. The Spill Technical Report, at minimum, must include the following information:

1. Spill causes and circumstances, including at minimum:
 - a. Complete and detailed explanation of how and when the spill was discovered;
 - b. Photographs illustrating the spill origin, the spill flow path, the extent of the spill, drainage conveyance system entrance and exit, receiving water, and post cleanup site conditions;
 - c. Diagram showing the spill failure point, appearance point(s), and ultimate destinations;
 - d. Detailed description of the methodology employed, and available data used to calculate the discharge volume and, if applicable, the recovered spill volume;
 - e. Detailed description of the spill cause(s);
 - f. Copy of original field crew records used to document the spill; and
 - g. Historical maintenance records for the failure location.
2. Enrollee's response to spill:
 - a. Chronological narrative description of all actions taken by the Enrollee to terminate the spill;
 - b. Explanation of how the Sewer System Management Plan Spill Emergency Response Plan was implemented to respond to and mitigate the spill; and
 - c. Final corrective action(s) completed and/or planned to be completed including a schedule for actions not yet completed, including:
 - i. Local regulatory enforcement action taken against an illicit discharge in response to this spill, as applicable.
 - ii. Identifiable system modifications, and operation and maintenance program modifications needed to prevent repeated spill occurrences.
3. Water Quality Monitoring, including at minimum:
 - a. Description of all water quality sampling activities conducted;
 - b. List of pollutants and parameters monitored, sampled and analyzed; as required in section 2.3. (Receiving Water Monitoring) of this Attachment;
 - c. Laboratory results, including laboratory reports;
 - d. Detailed location map illustrating all water quality sampling points; and
 - e. Other regulatory agencies receiving sample results (if applicable).
4. Evaluation of spill impact(s), including a description of short-term and long-term impact(s) to beneficial uses of the surface water.



Amended Certified Spill Reports for Category 1 and Category 2 Spills

The Enrollee shall update or add additional information to a certified Spill Report within 90 calendar days of the spill end date by amending the report or by adding an attachment to the Spill Report in the online CIWQS Sanitary Sewer System Database. The Enrollee shall certify the amended report.

After 90 days, the Enrollee shall contact the State Water Board at SanitarySewer@waterboards.ca.gov to request to amend a Spill Report. The Legally Responsible Official shall submit justification for why the additional information was not reported within the Amended Spill Report due date.



Water Quality Sampling and Testing

Water Quality Sampling and Testing (Photos Required with time stamp): For sewage spills in which an estimated 50,000 gallons or greater are discharged into a surface water, the Enrollee shall conduct the following water quality sampling no later than 18 hours after the Enrollee's knowledge of a potential discharge to a surface water:

- ❖ Collect one water sample, each day of the duration of the spill, at:
 - The DCS-001 location as described in section 2.3.4 (Receiving Water Sampling Locations) of this Attachment, if sewage discharges to a surface water via a drainage conveyance system; and/or
 - Each of the three receiving water sampling locations in section 2.3.4 (Receiving Water Sampling Locations) of this Attachment; If the receiving water has no flow during the duration of the spill, the Enrollee must report "No Sampling Due To No Flow" for its receiving water sampling locations.

The Enrollee shall analyze the collected receiving water samples for the following constituents per section 2.3.3 (Water Quality Analysis Specifications) of this Attachment:

- ❖ Ammonia, and Appropriate bacterial indicator(s) per the applicable Basin Plan water quality objectives, including one or more of the following, unless directed otherwise by the Regional Water Board:
 - Total Coliform Bacteria
 - Fecal Coliform Bacteria
 - E-coli
 - Enterococcus

Dependent on the receiving water(s), sampling of bacterial indicators shall be sufficient to determine post-spill (after the spill) compliance with the water quality objectives and bacterial standards of the California Ocean Plan or the California Inland Surface Water Enclosed Bays, and Estuaries Plan, including the frequency and/or number of post-spill receiving water samples as may be specified in the applicable plans.

The Enrollee shall collect and analyze additional samples as required by the applicable Regional Water Board Executive Officer or designee

Water Quality Analysis Specifications: Spill monitoring must be representative of the monitored activity (40 Code of Federal Regulations section 122.41(j)(1)).

Sufficiently Sensitive Methods: Sample analysis must be conducted according to sufficiently sensitive test methods approved under 40 Code of Federal Regulations Part 136 for the sample analysis of pollutants. For the purposes of this General Order, a method is sufficiently sensitive when the minimum level of the analytical method approved under 40 Code of Federal Regulations Part 136 is at or below the receiving water pollutant criteria.



Environmental Laboratory Accreditation Program-Accredited Laboratories

The analysis of water quality samples required per this General Order must be performed by a laboratory that has accreditation pursuant to Article 3 (commencing with section 100825) of Chapter 4 of Part 1 of Division 101 of the Health and Safety Code. (Water Code section 13176(a).) The State Water Board accredits laboratories through its Environmental Laboratory Accreditation Program (ELAP).

Receiving Water Sampling Locations

The Enrollee shall collect receiving water samples at the following locations.

Sampling of Flow in Drainage Conveyance System (DCS) Prior to Discharge

Sampling Location	Sampling Location Description
DCS-001	A point in a drainage conveyance system before the drainage conveyance system flow discharges into a receiving water.

Receiving Surface Water Sampling (RSW)¹

Sampling Location	Sampling Location Description
RSW-001 Point of Discharge	A point in the receiving water where sewage initially enters the receiving water.
RSW-001U: Upstream of Point of Discharge	A point in the receiving water, upstream of the point of sewage discharge, to capture ambient conditions absent of sewage discharge impacts.

Sampling Location	Sampling Location Description
RSW-001D: Downstream of Point of Discharge	A point in the receiving water, downstream of the point of sewage discharge, where the spill material is fully mixed with the receiving water.

- ❖ The Enrollee must use its best professional judgment to determine the upstream and downstream distances based on receiving water flow, accessibility to upstream/downstream waterbody banks, and size of visible sewage plume.
- ❖ Safety and Access Exceptions: If the Enrollee encounters access restrictions or unsafe conditions that prevents its compliance with spill response requirements or monitoring requirements in this General Order, the Enrollee shall provide documentation of access restrictions and/or safety hazards in the corresponding required report.



Monthly Certified Spill Reporting for Category 3 and Category 4 Spills

The Enrollee shall report and certify all Category 3 and Category 4 spills to the online CIWQS Sanitary Sewer System Database within 30 calendar days after the end of the month in which the spills occurred. (For example, all Category 3 and Category 4 spills occurring in the month of February shall be reported and certified by March 30th). After the Legal Responsible Official certifies the spills, the online CIWQS Sanitary Sewer System Database will issue a spill event identification number for each spill.

The monthly reporting of all Category 3 and Category 4 spills must address the following items for each spill:

1. Contact information: Name and telephone number of Enrollee contact person to respond to spill-specific questions,
2. Spill location name,
3. Location of the spill event including GPS coordinates of known spill boundaries:
 - a. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the spill appearance point explanation field;
4. Did the spill reach a drainage conveyance system? If Yes:
 - a. Description of the drainage conveyance system transporting the spill, and
 - b. The total spill volume fully recovered within the drainage system;
5. Did the spill directly or indirectly (via a drainage conveyance system) discharge into a water of the State?
6. Description and GPS coordinates of all discharge point(s), as applicable;
7. Estimate of total spill volume, inclusive of all discharge point(s);
8. Estimate of the spill volume that discharged to waters of the State, and spill volume not recovered from a drainage conveyance system;
9. Estimate of the spill volume recovered (if applicable);
10. Spill appearance point(s), including:
 - a. Number of appearance points,
 - b. Description of spill appearance point(s)
 - c. Location including GPS coordinates of each spill appearance point (or attach a sketch to illustrate the geographic location(s) of each spill appearance point), and
 - d. If a single sanitary sewer system failure results in multiple spill appearance locations, each appearance point must be described;
11. Spill start date and time;
12. Date and time the Enrollee was notified of, or self-discovered, the spill;
13. Estimated operator arrival time;



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14. All information provided in Draft Category 1 Spill Report, with verification, or necessary modification based on subsequently acquired information after submittal of draft report;
 15. Description of the spill event destination(s) and GPS coordinates of the furthest reaches of the spill;
 16. Estimate of the spill end date and time;
 17. Spill cause(s) (for example, root intrusion, grease deposition, etc.);
 18. System failure location (for example, main, lateral, pump station, etc.);
 19. The association of the spill with a storm event, if applicable;
 20. Description of how the volume estimations were calculated, including, at minimum:
 - a. The methodology and type of data relied upon, including supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered), and
 - b. The methodology and type of data relied upon to estimate the spill start time, ongoing spill rate at time of arrival (if applicable), and the spill end time;
 21. Description of spill corrective actions, including at a minimum:
 - a. Local regulatory enforcement action taken against an illicit discharge in response to this spill, as applicable, and
 - b. Identifiable system modifications, and operation and maintenance program modifications needed to prevent repeated spill occurrences at the same spill event location, including:
 - i. Adjusted schedule/method of preventive maintenance,
 - ii. Planned rehabilitation or replacement of sanitary sewer asset,
 - iii. Inspected, repaired asset(s), or replaced defective asset(s),
 - iv. Capital improvements,
 - v. Documentation verifying immediately implemented system modifications and operating/maintenance modifications,
 - vi. Description of spill response activities,
 - vii. Spill response completion date, and
 - viii. Ongoing investigation efforts, and expected completion date of investigation to determine the full cause of spill;
 22. Detailed narrative of investigation and investigation findings of cause of spill;
 23. Name and type of water body(s) impacted; and
 24. If discharged to a surface water, visual inspection of water body, narrative description, and photographs of impacted water body(s).



Implementation and Training

SMCSD to ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained to address emergency system operations, traffic control and other necessary response activities.

SERP Implementation for District Owned Spill:

1. District Staff receives a call-in regard to a potential sewage spill.
2. District Staff promptly notifies the General Manager or Primary Responder in the event of a reported sewage spill.
3. Staff Investigates potential District owned spill by gathering the following reported information:
 - a. Contact name and phone number who reported spill.
 - b. Address for site of spill.
 - c. Spill volume and impacted area.
4. District Staff arrives at the spill location and confirms District Owned Spill.
5. Staff begins setup of traffic control, if needed (Cones/Barricades/Signs) and takes pictures.
6. Staff will determine spill category and notify applicable agencies.
7. Minimize public access to the spilled sewage.
8. Staff sets up spill containment to mitigate contamination to maximum extent possible and takes pictures:
 - a. Contain spill area to protect against discharge into a storm drain.
 - b. Berms/Dikes/Plugs around catch basins or storm drain openings.
 - c. Spill Blanket/Absorbent over catch basin or storm drain openings.
9. Staff begins spill correction, cleanup and determines spill category:
 - a. Restore flow by hydro-jetting downstream maintenance hole till flow returns to regular flow level. If flow is unable to be restored, setup and initiate bypass operation, if flow is restored proceed to step b.
 - b. Vacuum surrounding area at spill site.
 - c. Return vacuumed sewage to the sewer system.
 - d. Disinfect with SMCSD-approved disinfectant.
 - e. Restore spill area to pre-spill condition.
10. Staff investigates and determines the cause of the spill:
 - a. Vandalism, Illicit Discharge, Roots, FOG, Sediment, Structural Failure and Capacity.
11. Staff documents and reports information:
 - a. General Manager completes Spill Report Form.
 - b. Complete Spill Building History Form if Spill has occurred in a building or residence.
 - c. Photos: Spill Area, Storm Drain, Depth Measurement, Structural Damage
 - d. Complete Failure Analysis.
12. Legally Responsible Official completes spill draft report and internal report.
13. Legally Responsible Official Certifies final report in CIWQS.



SERP Implementation for Private Lateral Spill:

1. District Staff receives a call-in regard to a potential sewage spill.
2. District Staff promptly notifies the General Manager.
3. Staff Investigates potential spill by gathering the following reported information:
 - a. Contact name and phone number who reported spill.
 - b. Address for site of spill.
 - c. Spill volume and impacted area.
4. District Staff arrives at the spill location and determines Private Lateral Spill Discharge with documentation and pictures.
5. If Spill remains on private property notify responsible party and SLO County Health Services. If spill enters public right-of-way, proceed to contact responsible party, if unavailable proceed to step 6 and if available continue to step 7.
6. District Staff will contact the responsible party and have private contractor respond.
7. Staff begins setup of traffic control, if needed (Cones/Barricades/Signs).
8. Staff will determine spill category and notify applicable agencies.
9. Minimize public access to and contact with the spilled sewage.
10. Staff sets up spill containment to mitigate contamination to maximum extent possible and takes pictures:
 - a. Contain spill area to protect against storm drain discharge.
 - b. Berms/Dikes/Plugs around catch basins or storm channel openings.
 - c. Spill Blanket/Absorbent over catch basin or storm channel openings.
11. Staff begins spill correction, cleanup and determines spill category (see table 2).
 - a. Restore flow by hydro-jetting downstream maintenance hole till flow returns to regular flow level. If flow is unable to be restored, setup and initiate bypass operation, if flow is restored proceed to step b.
 - b. Vacuum surrounding area at spill site.
 - c. Return vacuumed sewage to the sewer system.
12. Staff investigates and determines the cause for the spill:
 - a. Vandalism, Illicit Discharge, Roots, FOG, Sediment, Structural Failure and Capacity.
13. Begin spill correction, cleanup and take pictures:
 - a. Restore flow by hydro-jetting downstream maintenance hole till flow returns to regular flow level. If flow is unable to be restored within 15 minutes (see table 3 of the Sewer Division Bypass Plan), If flow is restored proceed to step b.
 - b. Vacuum surrounding area at spill site and return sewage to the sewer system.
14. Clean spill area with pressure washer and tools.
 - a. Disinfect with SMCSO-approved disinfectant.
 - b. Restore spill area to pre-spill condition.
15. Finalize Documentation and Internal Reports.
 - a. Maintain internal documents.



SERP Implementation for Other Agency (District/County/Special District):

1. District Staff receives a call-in regard to a potential sewage spill.
2. District Staff promptly notifies the General Manager or General Manager in the event of a reported sewage spill.
3. Staff Investigates potential District owned spill by gathering the following reported information:
 - a. Contact name and phone number who reported spill.
 - b. Address for site of spill.
 - c. Spill volume and impacted area.
4. District Staff arrives at the spill location and determines Other Agency Spill with documentation and pictures.
5. District Staff promptly notifies the General Manager in the event of a Spill.
6. District staff contacts Surrounding Agency Sewer System and asks if assistance is required. If no assistance is needed, proceed to step 15. If assistance is needed proceed to step 7.
7. Staff begins setup of traffic control, if needed (Cones/Barricades/Signs) and takes pictures.
8. Staff will determine spill category and notify applicable agencies (see table 1 and 2).
9. Minimize public access to and contact with the spilled sewage.
10. Staff sets up spill containment to mitigate contamination to maximum extent possible and takes pictures:
 - a. Contain spill area to protect against storm drain discharge.
 - b. Berms/Dikes/Plugs around catch basins or storm channel openings.
 - c. Spill Blanket/Absorbent over catch basin or storm channel openings.
11. Staff begins spill correction, cleanup and determines spill category (see table 2 and 4).
 - a. Restore flow by hydro-jetting downstream maintenance hole till flow returns to regular flow level. If flow is unable to be restored, setup and initiate bypass operation, if flow is restored proceed to step b.
 - b. Vacuum surrounding area at spill site.
 - c. Return vacuumed sewage to the sewer system.
12. Staff investigates and determines the cause of the spill:
 - a. Vandalism, Illicit Discharge, Roots, FOG, Sediment, Structural Failure and Capacity.
13. Begin spill correction, cleanup and take pictures:
 - a. Restore flow by hydro-jetting downstream maintenance hole till flow returns to regular flow level. If flow is unable to be restored within 15 minutes, setup and initiate bypass operation. If flow is restored proceed to step b.
 - b. Vacuum surrounding area at spill site and return sewage to the sewer system.
14. Clean spill area with pressure washer and tools.
 - a. Disinfect with SMCSO-approved disinfectant.
 - b. Restore spill area to pre-spill condition.
15. Finalize Documentation and Internal Reports.
 - a. Maintain internal documents.



Initial and Annual Refresher Training

All District personnel who may have a role in responding to, reporting, and/or mitigating a sewage spill should receive training on the contents of the SERP. All new employees should receive training before they are placed in a position where they may have to respond. Current employees should receive annual refresher training on this plan and the procedures to be followed. All contractor personnel who may have a role in responding to, reporting to the District, and/or mitigating a wastewater collection system overflow should receive training on the contents of the SERP.

Archived Training:

Records should be kept of all training that is provided in support of this plan. The records for all scheduled training courses and for each overflow emergency response training event should include date, time, place, content, name of trainer(s), and names of attendees.

Contractors Working on District Sewer Facilities:

All contractors working on District sewer facilities will be required to develop a project specific SERP, to provide project personnel with training regarding the content of the contractor's SERP and their role in the event of a spill, and to follow that SERP in the event that they cause or observe a spill. Specifications shall be unique to each project and overall approval remains with the General Manager.

Periodic training drills are conducted to ensure that contractor employees are up to date on the procedures, the equipment is in working order, and the required materials are readily available. The training drills should cover scenarios typically observed during sewer-related emergencies (e.g., mainline blockage, mainline failure, force main failure, lift station failure, and lateral blockage). The results and the observations during the drills should be recorded and action items should be tracked to ensure completion.



Emergency System Operations:

- ❖ Lift Stations.
- ❖ Hazardous Waste Spills.
- ❖ Illicit Discharges.

Lift Station Operations: There are two sewer lift stations throughout the District. The District's sewer lift stations are currently monitored by a Supervisory Control and Data Acquisition System (SCADA) alarm system. The SCADA equipment detects and sends alarms in response to pump failures, high and low wet well levels, and power outages. If an alarm occurs during work hours and/or off hours SCADA will send a text message to the District's General Manager and first responder via cell phone. In addition, both lift stations are equipped with local alarms and signs with the District's contact information. SMCS staff conducts weekly inspections of the sewer lift stations as part of their preventative maintenance plan. Any concerns observed with the sewer lift stations are reported to the General Manager who responds to the concerns or directs field staff to respond.

The Lift Stations are located at:

1. 1765 Bonita Pl, San Miguel, CA 93451 (Machado Wastewater Treatment Facility)
2. 942 Soka Wy, San Miguel, CA 93451 (Soka Way Lift Station)

Hazardous Waste Spills: On occasion the General Manager or District staff may encounter a sewer spill that involves hazardous materials. In those instances, or in any instance where there is a reasonable doubt, they should immediately contact the General Manager and the San Luis Obispo Hazmat Team for special instructions.

The San Luis Obispo Hazmat Team is a multi-agency team comprised of 30 members from CAL FIRE, San Luis Obispo City, Five Cities Fire, Paso Robles City, Atascadero Fire, San Luis Obispo County Environmental Health, and the California Men's Colony.

The San Luis Obispo Hazmat Team is experienced in responding to many emergency challenges, the HazMat Team intentionally intervenes in chemical, biological, and radiological accidents.

The San Luis Obispo County Fire Department provides 24-hour Haz Mat and is located at:

100 Cross Street, San Luis Obispo, CA 93401
(805) 543-4244 slu.reception@fire.ca.gov

Illicit Discharge Spills: Any discharge into the MS4 or from the MS4 into a receiving water that is prohibited under local, state, or federal statutes, ordinances, codes, or regulations. The term illicit discharge includes any non-storm water discharge, except authorized non-storm water discharges; conditionally exempt non-storm water discharges; and non-storm water discharges resulting from natural flows.



Traffic Control:

Traffic Control equipment and vehicles are located at the San Miguel Community Services District Machado Facility: 1765 Bonita Pl, San Miguel, CA 93451

Equipment includes but is not limited to the following: light bars, arrow boards, advanced warning retractable signs, barricades, channelizers, vehicle lights and additional street lighting.

- ❖ Staff shall be familiar with WATCHBOOK: Work Area Traffic Control Handbook
- ❖ Staff Shall be familiar with Manual on Uniform Traffic Control Devices
- ❖ All first responder staff have received training from a contractor or the District in regard to proper Traffic Control procedures.

Emergency Bypass Operations:

Staff shall be able to identify, understand and operate the Districts bypass equipment which include but aren't limited to:

- ❖ AODD (air-operated double-diaphragm) pump.
- ❖ Pipe plugs (pneumatic and mechanical).
- ❖ Portable submersible pumps.
- ❖ Portable trash pump.
- ❖ Floats and switch controls.
- ❖ Lay flat and rigid flex hose connections for pumps.
- ❖ Various utility vehicles.

Annual SERP training to familiarize SMCSO staff about operations shall be coordinated with the General Manager, District staff and contractors as deemed necessary.



Containment

Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;

The emergency response staff should attempt to contain as much of the spilled sewage as possible using the following steps:

- ❖ Determine the immediate destination of the overflowing sewage;
- ❖ Plug storm drains entry points using air plugs, sandbags, plastic mats, and/or other dam construction material to contain the spill, whenever appropriate. If spilled sewage has made contact with the storm drainage system, attempt to contain the spilled sewage by plugging downstream storm drainage facilities;
- ❖ Contain/direct the spilled sewage using dike/dam, sandbags, or earthen berms in landscaped or undeveloped areas;
- ❖ Pump around the blockage/pipe failure/lift station to convey the wastewater to the nearest downstream manhole or facility;
- ❖ If the spill is caused by a private sewer lateral, District staff may shut off the water supply to that property when the wastewater endangers the public health;
- ❖ The General Manager will be contacted prior to proceeding with a water supply shut off.



Remediation

SMCSD minimizes and remediates public health impacts and adverse impacts on beneficial uses of waters of the State; removes sewage from the drainage conveyance system; cleans the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;

Public Health Response Procedures:

Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;

Public Notification (Photos required with time stamp): The District will direct the posting of signs and place barricades, cones, traffic arrow board, and caution tape as needed to keep vehicles and pedestrians away from contact with spilled sewage.

Creeks, streams, and drainage channels that have been contaminated as a result of a spill should be posted at visible access locations until the risk of contamination has subsided to acceptable background levels.

The warning signs, once posted, should be checked every day to ensure that they are still in place. Do not remove the signs until directed by the General Manager.

Photos should be taken of all posted warning signs to assure ultimate removal and to provide proof of signage posting if claims or litigation result from the spill.

Major spills may warrant broader public notice. The approval of the General Manager is required prior to contacting local media when significant areas may have been contaminated by sewage.

Watershed Information: The confluence of the Salinas and Estrella Rivers occurs in Northern San Luis Obispo County, within the town of San Miguel. The highest elevation in the watershed is approximately 2,854 feet, and the lowest elevation is around 607 feet. Vineyards slightly predominate over oak woodlands and grassland communities. Tree species such as blue oak, and valley oak dominate the oak woodland, while western sycamore, Fremont's cottonwood, and willows are found in the riparian woodlands along the Estrella River. Agriculture is the dominant use. The Estrella River Valley is generally used most intensively for agriculture because of better soils and water availability. Irrigated production has increased during the last 10 years, particularly in vineyards and alfalfa. Dry farming and grazing operations encompass the rest of the agricultural uses.



Proactive Approach

SMCSD operations include numerous elements in preventing sewer system overflows, mitigating spill volumes, limiting public disruption, and mitigating environmental impacts should a spill occur.

- ❖ Implementation of technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;
- ❖ A routine maintenance program is conducted on the entire mainline system that includes annual mainline jetting and CCTV inspection with NAASCO coding every 5 years;
- ❖ Staff are trained in the proper procedures for addressing spills, hazardous materials, traffic control setups, PPE use, and communications;
- ❖ Staff offices and equipment are located adjacent to the wastewater treatment plant, affording easy visual observations during working hours. SMCSD also installed updated SCADA equipment at the wastewater treatment plant to provide instant alerts and situational data with some ability for remote control of treatment plant operations;
- ❖ Emergency bypass equipment, a jet truck, spill response supplies, a CCTV trailer, PPE, and other tools are stocked and ready for deployment at the wastewater treatment plant;
- ❖ The District utilizes multiple vehicles, equipment, and tools to decrease spill volumes and increase awareness within the community;
- ❖ District staff perform practice drills to ensure situational awareness for potential spills and ensure operational readiness;
- ❖ Maintains relationships with bordering cities and regional agencies to ensure reporting, notification and monitoring requirements are understood and communicated, as well as fostering a healthy mutual aid system if needed.



External Coordination

SMCSD will implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;

SMCSD has an established relationship with the City of Paso Robles for vacuum services which will assist in remediation in the event of a spill.

SMCSD has established communication with the San Luis Obispo County Environmental Health Services regarding all concerns for illicit discharges involving sewer spills. SLO Environmental Health Services is the direct reporting agency for SLO County Department of Public Works and will dispatch staff to drainage channels if necessary.

After clean-up and reporting are completed, SMCSD will communicate with all staff and any agencies that provided assistance to determine the cause of the spill and discuss how a similar incident can be avoided in the future. This may include increased preventative maintenance, repair or rehabilitation of the sewer infrastructure. The response procedure should also be discussed to determine if it should be modified in any way to make it more efficient.



Internal Analysis

SMCSD will conduct post-spill assessments of spill response activities.

Post-Spill Assessment of Spill Response Activities:

Every spill event is an opportunity to evaluate the response and reporting procedures. Each sewer overflow event is unique, with its own elements and challenges including volume, cause, location, terrain, and other parameters.

After a spill event, all of the participants, from the person who received the call to the last person to leave the site, will meet to review the procedures used and to discuss what worked and where improvements could be made in responding to and mitigating future spill events.

It is the responsibility of the General Manager to call for the meeting. The results of the debriefing should be documented to ensure the action items are completed. These meeting minutes shall be added to the internal spill records.

Spill Analysis Investigation:

The objective of the spill analysis investigation is to determine the “root cause” of the spill and to identify corrective action(s) needed that will reduce or eliminate potential for additional spills to occur. The investigation will include reviewing all relevant data to determine appropriate corrective action(s) for the line segment. The investigation will be conducted by the General Manager. The investigation should include the following:

- ❖ Reviewing past maintenance records;
- ❖ Reviewing original construction plans and regulatory reports;
- ❖ Reviewing available photographs;
- ❖ Conducting a CCTV inspection to determine the condition of the line segment immediately following the spill and reviewing the video and logs;
- ❖ Interviewing staff who responded to the spill, as well as interviewing customers and residents.

The result of the spill analysis investigation should determine the root cause and the identification of the corrective actions. The **Spill Report Form** should be used to document the investigation.



Annual Assessment

Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.

SMCSD is committed to reviewing and updating its SERP and this is evidenced in its continued ability to have no spills occurring in its sewer system. The below log is utilized to track modifications as they arise.

Date:	SERP Items Modified



Appendix: Methods for Estimating Spill Volume



Method 1 - Eyeball Estimate

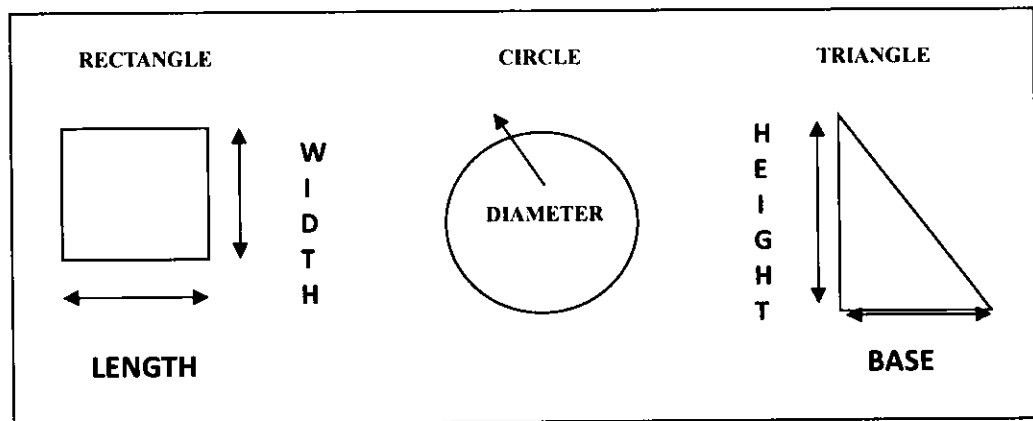
The volume of small spills can be estimated using an “eyeball estimate”. To use this method, imagine the amount of water that would spill from a bucket or a barrel. A bucket contains 5 gallons, and a barrel contains 50 gallons. If the spill is larger than 50 gallons, try to break the standing water into barrels and then multiply by 50 gallons. This method is useful for contained spills up to approximately 200 gallons. Spills greater than 200 gallons should use an alternative method.



Method 2 - Measured Volume

The volume of most small spills that have been contained can be estimated using this method. The shape, dimensions, and the depth of the contained sewage are needed. The shape and dimensions are used to calculate the area of the spills, and the depth is used to calculate the volume.

Common Shapes and Dimensions:



Step 1 Sketch the shape of the contained sewage (see figure above).

Step 2 Measure or pace off the dimensions.

Step 3 Measure the depth at several locations and select an average.

Step 4 Convert the dimensions, including depth, to feet.

Step 5 Calculate the area in square feet using the following formulas:

Rectangle: Area = length (feet) x width (feet)

Circle: Area = diameter (feet) x diameter (feet) x 0.79

Triangle: Area = base (feet) x height (feet) x 0.5

Step 6 Multiply the area (square feet) times the depth (in feet) to obtain the volume in cubic feet.

Step 7 Multiply the volume in cubic feet by 7.5 to convert it to gallons

Step 8 Write all computations down and include them with the Spill Report Form.

Spill Volume: Once duration and flow rate have been estimated, the volume of the spill is the product of the duration in hours or days and the flow rate is in gallons per hour or gallons per day. For example:

- 22 upstream connections x 9 gal per hr. per connection =
 - 198 gal per hr./60 min per hr. = 3.3gpm
- Spill start time = 11:00
- Spill end time = 14:00
- Spill duration = 3 hours
- 3.3 gallons per minute x 3 hours x 60 minutes per hour = 594 gallons



Method 3 - Duration and Flow rate

Calculating the volume of larger spills, where it is difficult or impossible to measure the area and depth, requires a different approach. In this method, separate estimates are made of the duration of the spill and the flow rate. The methods of estimating duration and flow rate are: **Duration:** The duration is the elapsed time from the time the spill started to the time that the flow was restored.

Start Time: The start time is sometimes difficult to establish. Here are some approaches:

Local residents can be used to establish start time. Inquire as to their observations. Spills that occur in rights-of-way are usually observed and reported promptly. Spills that occur out of the public view can go on longer. Sometimes observations like odors or sounds (e.g. water running in a normally dry creek bed) can be used to estimate the start time.

Changes in flow on a downstream flow meter can be used to establish the start time. Typically, the daily flow peaks are “cut off” or flattened by the loss of flow. This can be identified by comparing hourly flow data during the spill event with flow data from prior days.

Conditions at the spill site change over time. Initially there will be limited deposits of toilet paper and other sewage solids. After a few days to a week, the sewage solids form a light-colored residue. After a few weeks to a month, the sewage solids turn dark. The quantity of toilet paper and other materials of sewage origin increase over time. These observations can be used to estimate the start time in the absence of other information. Taking photographs to document the observations can be helpful if questions arise later in the process.

It is important to remember that spills may not be continuous. Blockages are not usually complete (some flow continues). In this case the spill would occur during the peak flow periods (typically 10:00 to 12:00 and 13:00 to 16:00 each day). Spills that occur due to peak flows in excess of capacity will occur only during, and for a short period after heavy rainfall.

End Time: The end time is usually much easier to establish. Field staffs on-site observe the “blow down” that occurs when the blockage has been removed. The “blow down” can also be observed in downstream flow meters.

Flow Rate: The flow rate is the average flow that left the wastewater collection system during the time of the spill. There are three common ways to estimate the flow rate:

Flow meter: Changes in flows in downstream flow meters can be used to estimate the flow rate during the spill.

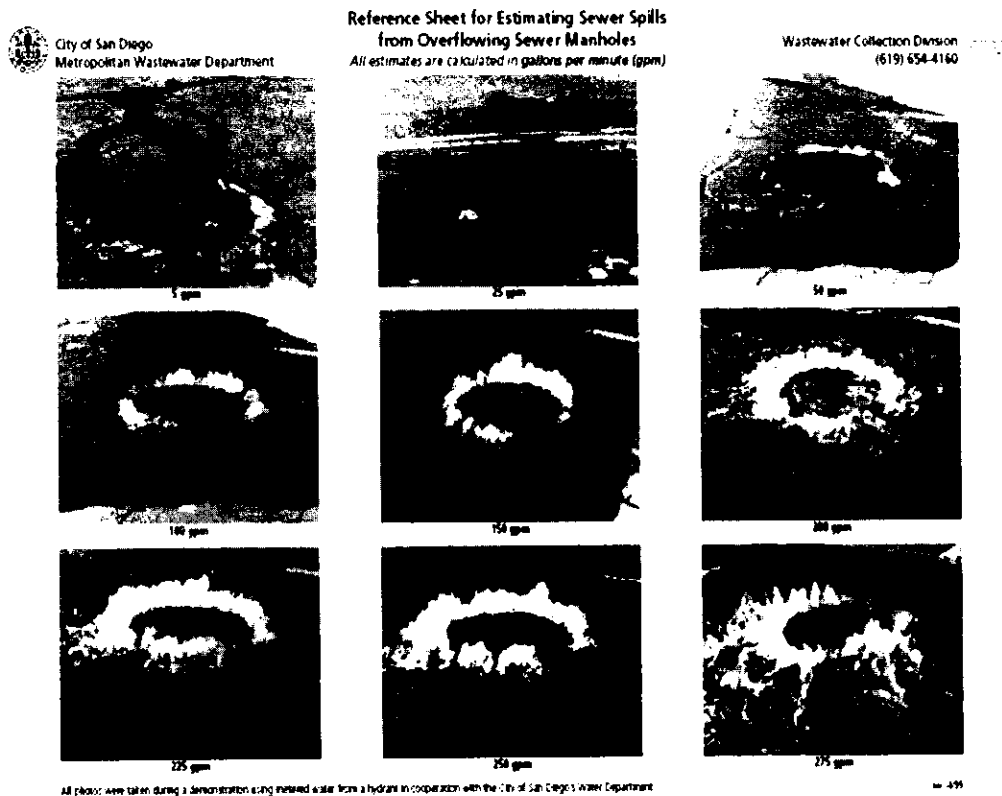
Counting Connections: Once the location of the spill is known, the number of upstream connections can be determined from the sewer maps. Multiply the number of connections by 200 to 250 gallons per day per connection or 8 to 10 gallons per hour per connection.



Method 4: San Diego Spill Reference Sheet

The San Diego Spill Reference Sheet is a chart that illustrates raw sewage flowing from maintenance hole covers at a variety of flow rates. These flows were metered and are considered widely to be highly accurate.

The documented timestamped pictures taken in the field by staff can be used to select the appropriate flow rate from the chart.





SMCSD Spill Report Form

Within three (3) business days of the Enrollee's knowledge of a Category 1 or Category 2 spill, the Enrollee shall submit a Draft Spill Report to the online CIWQS Sanitary Sewer System Database. The Draft Spill Report must, at a minimum, include the following items:

1. **Contact information: Name and telephone number of Enrollee contact person to respond to spill-specific questions:** _____
2. **Spill location name:** _____
3. **Location of the spill event including GPS coordinates of known spill boundaries:**
 - c. If a single overflow event results in multiple appearance points, provide GPS coordinates for the appearance point closest to the failure point and describe each additional appearance point in the spill appearance point explanation field
 - d. GPS Coordinates: _____
 - e. GPS Coordinates: _____
 - f. GPS Coordinates: _____
 - g. GPS Coordinates: _____
4. **Did the spill reach a drainage conveyance system? If Yes:**
 - a. Description of the drainage conveyance system transporting the spill:

 - b. **The total spill volume fully recovered within the drainage system:** _____
 - c. **Total Volume Recovered:** _____
5. **Did the spill directly or indirectly (via a drainage conveyance system) discharge into:**
 - a. A water of the United States for a Category 1 spill,
 - i. **(Circle) YES or NO**
 - b. A water of the State that are not waters of the United States, for a Category 2 spill
 - i. **(Circle) YES or NO**
6. **Description and GPS coordinates of all discharge point(s), as applicable**
 - a. Description and GPS Coordinates:

 - b. Description and GPS Coordinates:

 - c. Description and GPS Coordinates:

 - d. Description and GPS Coordinates:



-
7. Estimate of total spill volume, inclusive of all discharge point(s): _____
8. Estimate of the spill volume that discharged to waters of the State, and spill volume not recovered from a drainage conveyance system: _____
9. Estimate of the spill volume recovered (if applicable): _____

10. Spill appearance point(s), including:

- a. Number of appearance points: _____
- b. Description of spill appearance point(s):

- c. Location including GPS coordinates of each spill appearance point (or attach a sketch to illustrate the geographic location(s) of each spill appearance point):

d. Sketch Description:

- e. If a single sanitary sewer system failure results in multiple spill appearance locations, each appearance point must be described:



11. Spill start date and time: _____

12. Date and time the Enrollee was notified of, or self-discovered, the spill: _____

13. Estimated operator arrival time: _____

14. For Category 1 spills requiring California Office of Emergency Services notification:

a. The date and time the Enrollee notified California Office of Emergency Services: _____

b. **The California Office of Emergency Services Control Number:** _____

Description of the spill event destination(s) including GPS coordinates that represent the full spread of the Spill:

15. Spill end date and time: _____

16. Description of how the spill volume estimations were calculated, including at a minimum:

d. The methodology, assumptions and type of data relied upon, such as supervisory control and data acquisition (SCADA) records, flow monitoring or other telemetry information used to estimate the volume of the spill discharged, and the volume of the spill recovered (if any volume of the spill was recovered):

e. The methodology(ies), assumptions and type of data relied upon for estimation of the spill start time and the spill end time:

17. Spill cause(s) (for example, root intrusion, grease deposition, etc.): _____

18. System failure location (for example, main, lateral, pump station, etc.): _____

19. Whether or not the spill was associated with a storm event: _____



20. Description of spill response activities including description of immediate spill containment and cleanup efforts:

21. Description of spill corrective action, including steps planned or taken to reduce, eliminate, and prevent reoccurrence of the spill, and a schedule of major milestone for those steps:

22. Spill response completion date: _____

23. Whether or not there is an investigation. If yes, detailed narrative of investigation and investigation findings of cause of spill:

24. Reasons for an ongoing investigation (as applicable) and the expected date of completion:

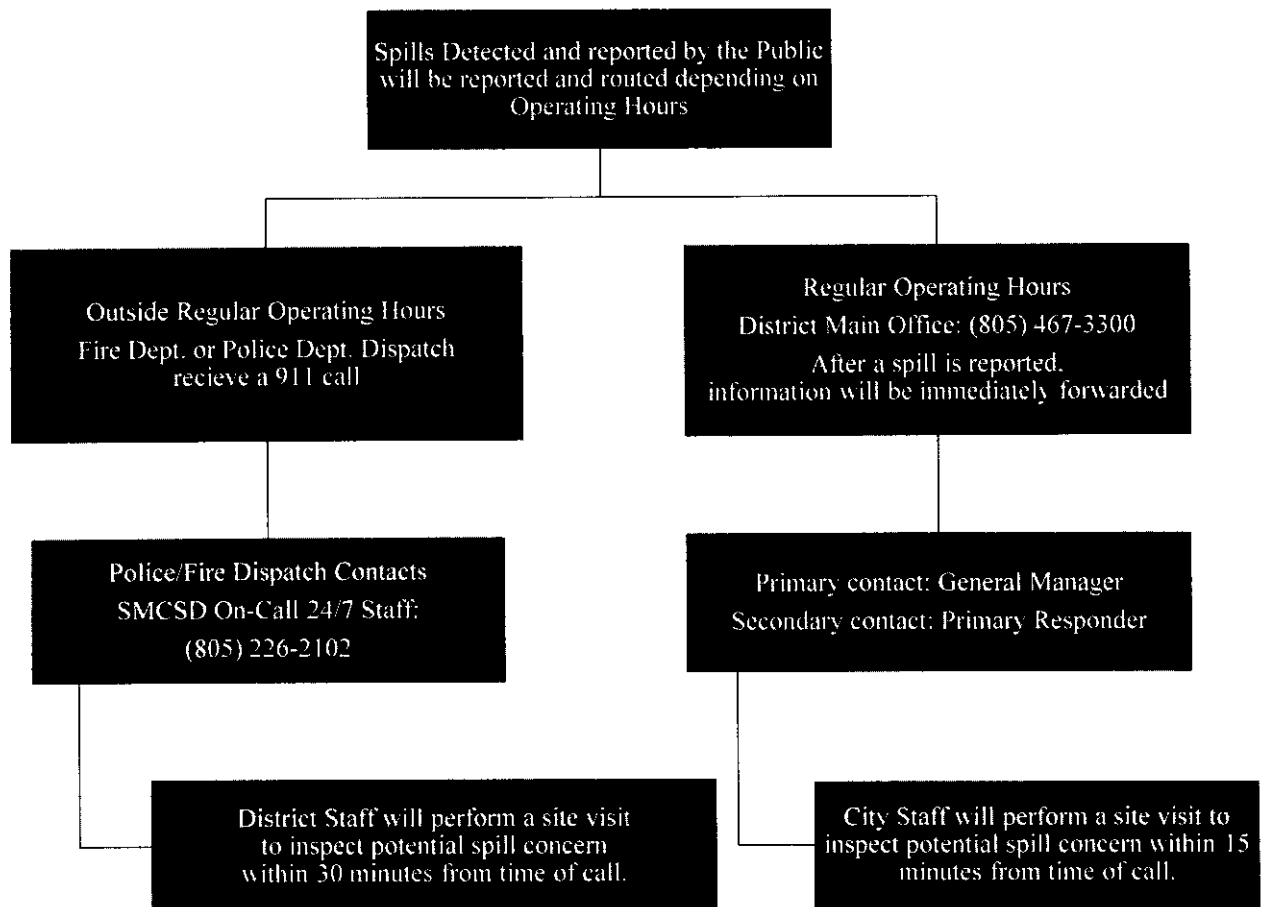
25. Name and type of water body(s) impacted:

- a. Public closure, restricted public access, temporary restricted use, and/or posted health warnings due to spill: _____
- b. Responsible entity for closing/restricting use of water body: _____
- c. Number of days closed/restricted as a result of the spill: _____



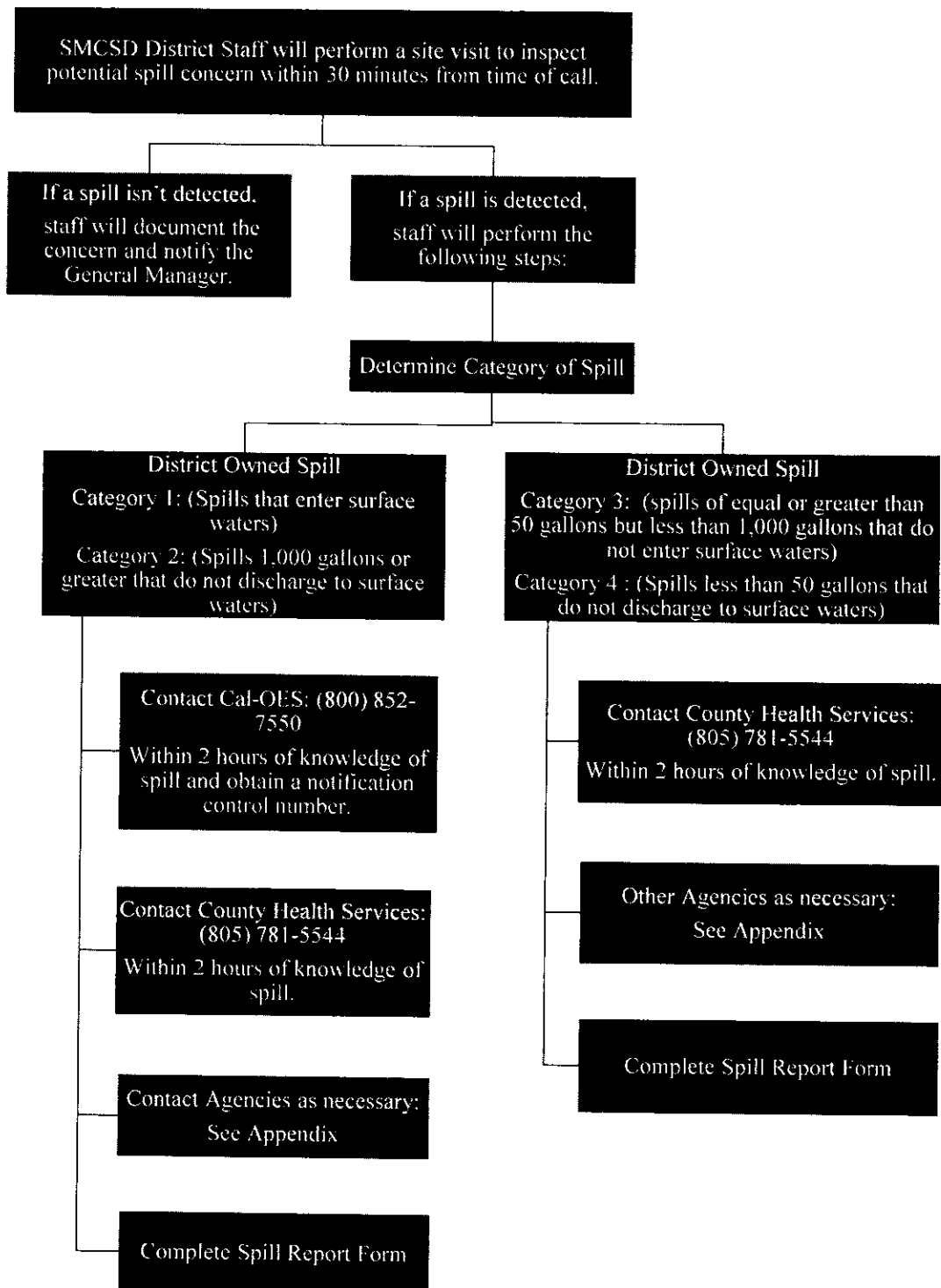
Chain of Communication for Spill Response

District Receives Call Reporting a Spill (Initial Response):



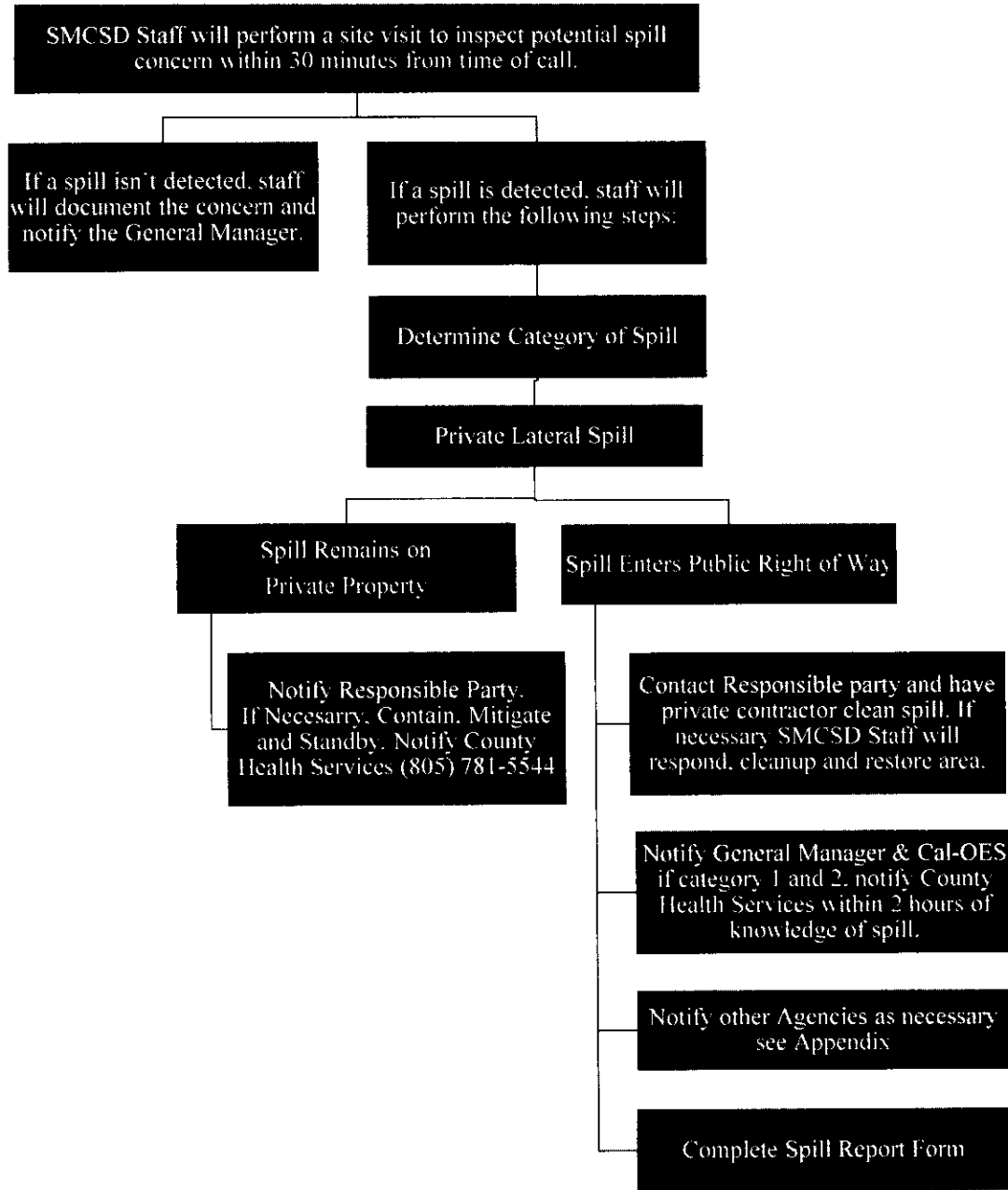


District Owned Sewer Discharge Procedures:



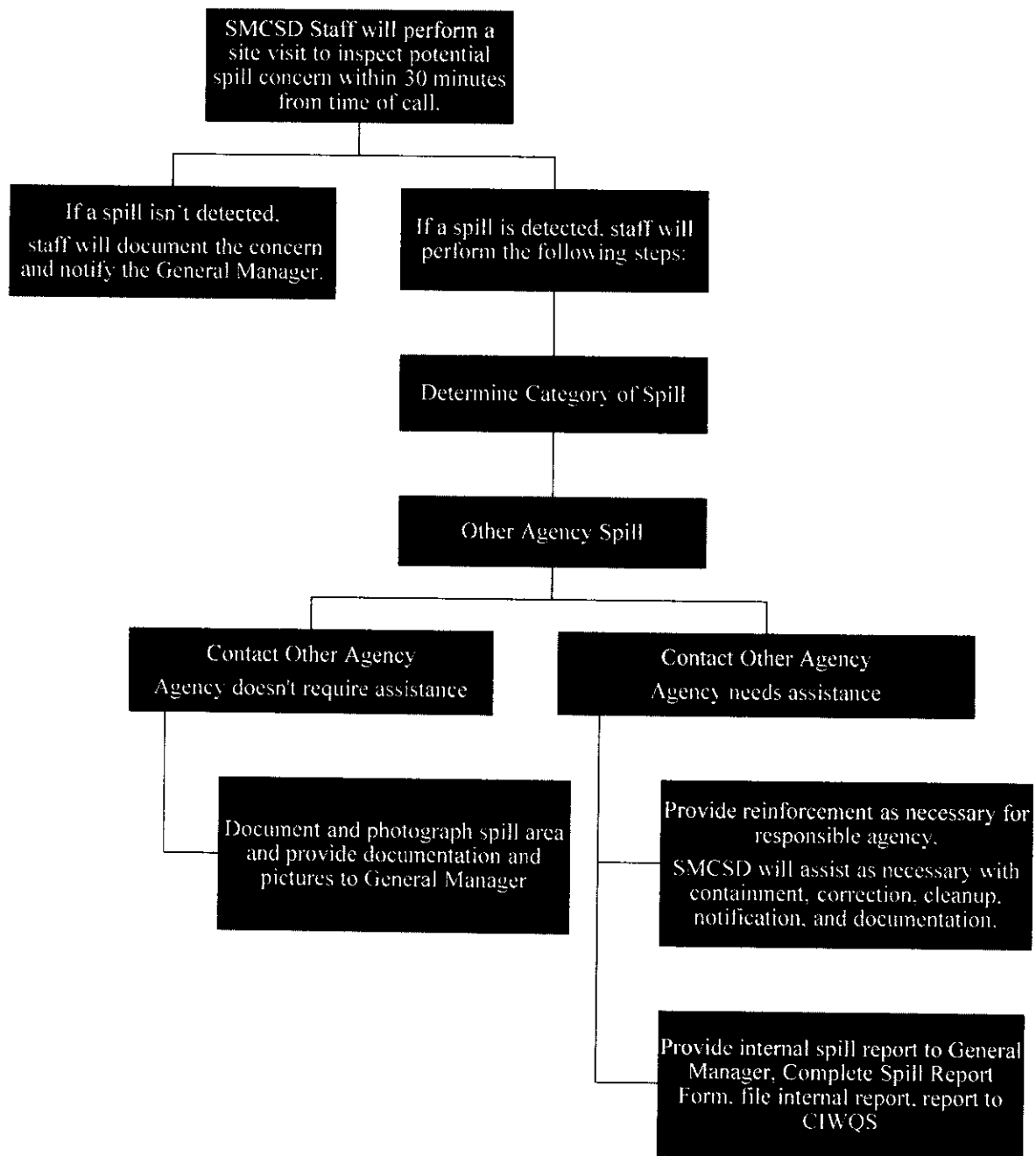


Private Lateral Sewer Discharge Procedures:





Other Agency Owned Sewer Discharge Procedures:





Contact List for San Miguel Community Services District:

Agency Name	Contact Name	Board Member Position	Address	City	State	Zip Code	Phone Number	Email Address
SMCSD	Ashley Sangster	President	PO Box 180	San Miguel	CA	93451	(805) 467-3388	tamara.parent@sanmiguelcsd.org
SMCSD	John Green	Vice President	PO Box 180	San Miguel	CA	93451	(805) 467-3388	tamara.parent@sanmiguelcsd.org
SMCSD	Brendin Beatty	Director	PO Box 180	San Miguel	CA	93451	(805) 467-3388	tamara.parent@sanmiguelcsd.org
SMCSD	Rod Smiley	Director	PO Box 180	San Miguel	CA	93451	(805) 467-3388	tamara.parent@sanmiguelcsd.org
SMCSD	Owen Davis	Director	PO Box 180	San Miguel	CA	93451	(805) 467-3388	tamara.parent@sanmiguelcsd.org
Agency Name	Contact Name	SMCSD Position	Address	City	State	Zip Code	Phone Number	Email Address
SMCSD	Kelly Dodds	General Manager (LRO)	PO Box 180	San Miguel	CA	93451	(805) 467-3388	kelly.dodds@sanmiguelcsd.org
SMCSD	Joe Martinez	Field Operator Lead	PO Box 180	San Miguel	CA	93451	(805) 467-3388	joe.martinez@sanmiguelcsd.org
SMCSD	Scott Young	Fire Chief	PO Box 180	San Miguel	CA	93451	(805) 467-3388	scott.young@sanmiguelcsd.org
SMCSD	Michelle Hido	Financial Officer	PO Box 180	San Miguel	CA	93451	(805) 467-3388	michelle.hido@sanmiguelcsd.org
SMCSD	Tamara Parent	Board Clerk	PO Box 180	San Miguel	CA	93451	(805) 467-3388	tamara.parent@sanmiguelcsd.org
SMCSD	Kindsay Valencia	Account Clerk	PO Box 180	San Miguel	CA	93451	(805) 467-3388	billing@sanmiguelcsd.org
Agency Name	Contact Name	Agency Position	Address	City	State	Zip Code	Phone Number	Email Address
City of Paso Robles	Emergency	Wastewater Contact	1000 Spring Street	Paso Robles	CA	93446	(805) 237-6464	UTLDirector@prcity.com
SLO County Health	Peter Hague	Director of Environmental Health	2156 Sierra Way, Suite B	San Luis Obispo	CA	93401	(805) 781-5544	ehs@co.slo.ca.us
SLO Fire Dept HAZMAT	Customer Service	Customer Service Rep	100 Cross Street	San Luis Obispo	CA	93401	(805) 543-4244	slu.reception@fire.ca.gov
SWRCB Region 3	Customer Service	Customer Service Rep	895 Aviation Blvd Suite 101	San Luis Obispo	CA	93401	(805) 549-3147	CentralCoast@waterboards.ca.gov
SLO County Sheriff (North)	Customer Service	Customer Service Rep	356 North Main Street	Templeton	CA	93465	(805) 434-4290	---
CAL - OES	Customer Service	Customer Service Rep	3650 Schriever Ave	Mather	CA	95655	(800) 852-7550	---
SLO County Agriculture	Customer Service	Customer Service Rep	2156 Sierra Way	San Luis Obispo	CA	93401	(805) 781-5910	AgCommSLO@co.slo.ca.us
CA Dept Fish & Game Region 4	Customer Service	Customer Service Rep	1234 E. Shaw Avenue	Fresno	CA	93710	(559) 243-4005 (831) 649-2817	reg4assistant@wildlife.ca.gov



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SAN MIGUEL COMMUNITY SERVICES DISTRICT
SEWER SYSTEM MANAGEMENT PLAN - AUDIT
Audit Period Year 2025

Sewer System Management Plan Audit due 4/1/2026
CS Name: San Miguel CSD CS
WDID: 3SSO10321
Date of Completion: 11/1/2025



Statement of Compliance

Required per the State Water Resource Control Boards re-issued order: Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ, Section 5.4 and 3.10.

Section 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.

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:

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

The Enrollee shall submit a complete audit report that includes:

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

A new Enrollee of this General Order (that did not have a sanitary sewer system enrolled in the previous State Water Board Order 2006-0003-DWQ) shall conduct its first internal Sewer System Management Plan audit for the time period between the date of submittal of its certified Sewer System Management Plan and the third subsequent December 31st date. The audit report must be submitted into the online CIWQS Sanitary Sewer System Database by July 1 of the following calendar year.

Section 3.10. - Sewer System Management Plan Audit Reporting Requirements:

The Enrollee shall submit its Sewer System Management Plan Audit and other pertinent audit information, in accordance with section 5.4 (Sewer System Management Plan Audits) of this General Order, to the online CIWQS Sanitary Sewer System Database by six (6) months after the end of the 3-year audit period. If a Sewer System Management Plan Audit is not conducted as required: the Enrollee shall:

- Update the online CIWQS Sanitary Sewer System Database and select the justification for not conducting the Audit; and
- Notify its corresponding Regional Water Board (see Attachment F (Regional Water Quality Control Board Contact Information)) of the justification for the lapsed requirements.

The Enrollee's reporting of a justification for not conducting a timely Audit does not justify non-compliance with this General Order. The Enrollee shall:

- Submit the late Audit as required in this General Order; and
- Comply with subsequent Audit requirements and due dates corresponding with the original audit cycle.

Audit reports submitted to the CIWQS Sanitary Sewer System Database will be viewable only to Water Boards staff.

State Water Resource Control Board - Region 3 Central Coast Contact Information:

Address: 895 Aerovista, Place, Suite 101

City: San Luis Obispo

Zip Code: 93401

Phone: (805) 549-3147

Consultants Compliance Statement:

Engineered Utility Solutions, LLC (EUS) is an environmental compliance firm that was hired by the San Miguel Community Services District (**SMCSD**) to perform their Sewer System Management Plan internal audit for the period covering (8/3/22 – 8/2/25). EUS has many years of experience in operations and compliance reporting within the utilities industry. The goal for EUS in all compliance matters is to develop a strategic plan with agencies to maintain their wastewater collection system in a way that provides environmental sustainability for the public and planet.

This audit was prepared in accordance with the State Water Resource Control Boards Waste Discharge Requirements including General Order 2022-0103.

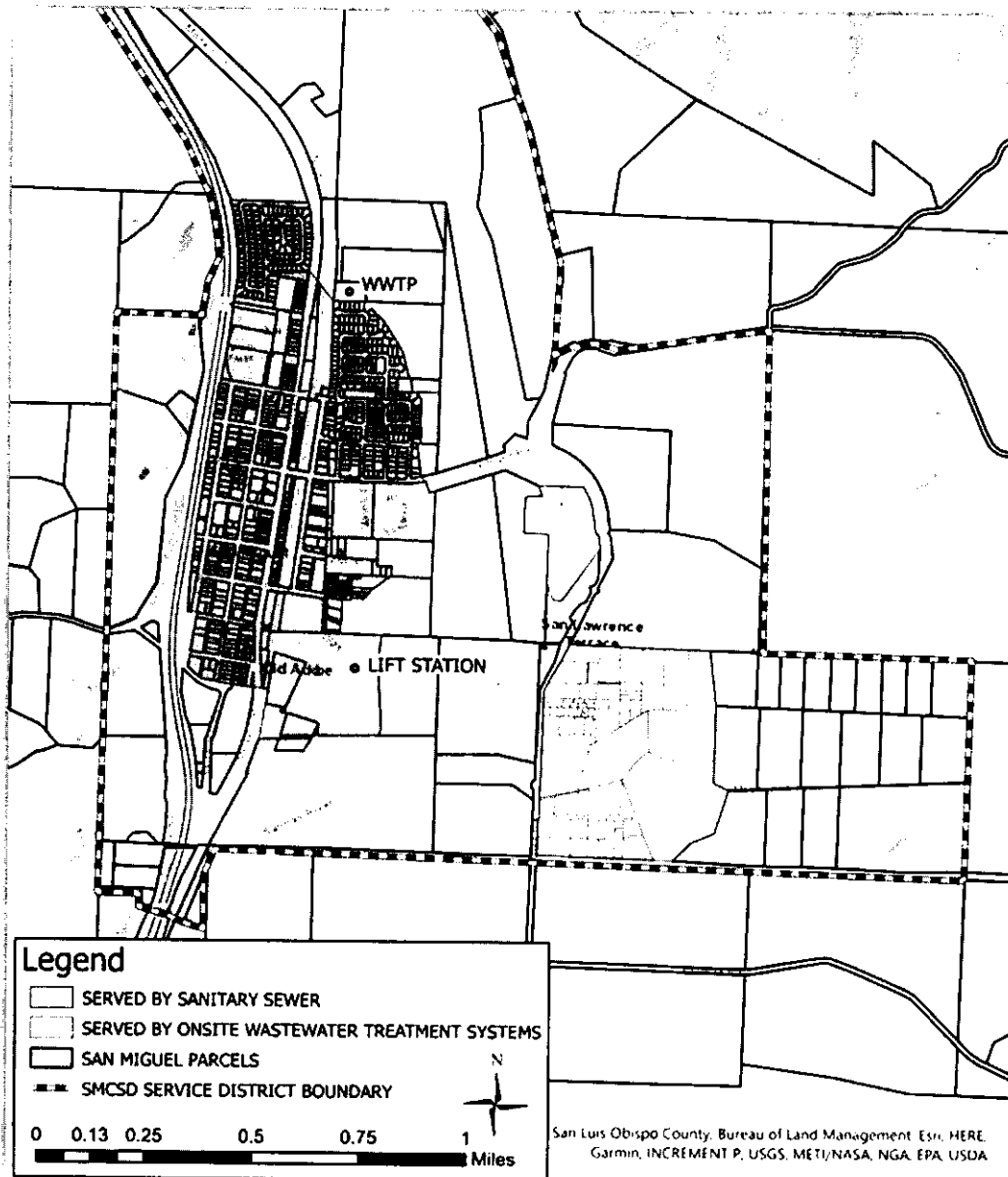
San Miguel Community Services District



Introduction: The San Miguel Community is an unincorporated community located in the San Luis Obispo County (County). In February 2000, the San Miguel Community Services District (District) was formed, to include fire protection, lighting, and water utility services once served by the San Miguel Fire Protection District, the San Miguel Lighting District, and the County Waterworks District #1, respectively. In April of 2001 the San Miguel Sanitary District (which provided Sewer and Solid Waste services) was also consolidated with the newly formed District, adding sewer collection/treatment and solid waste services to the District's services.

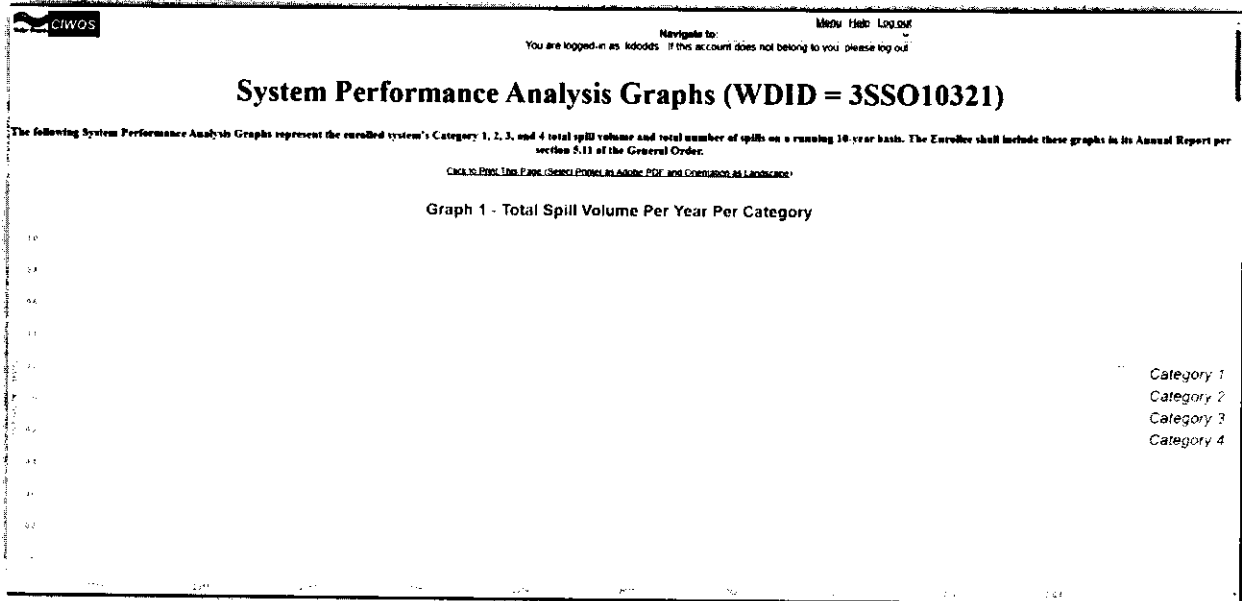
Today, the District encompasses a total area of 1,940 acres of land and is located adjacent to Highway 101 seven miles north of the City of Paso Robles. The District's service area includes a population of 2,821 residents according to the 2020 Census.

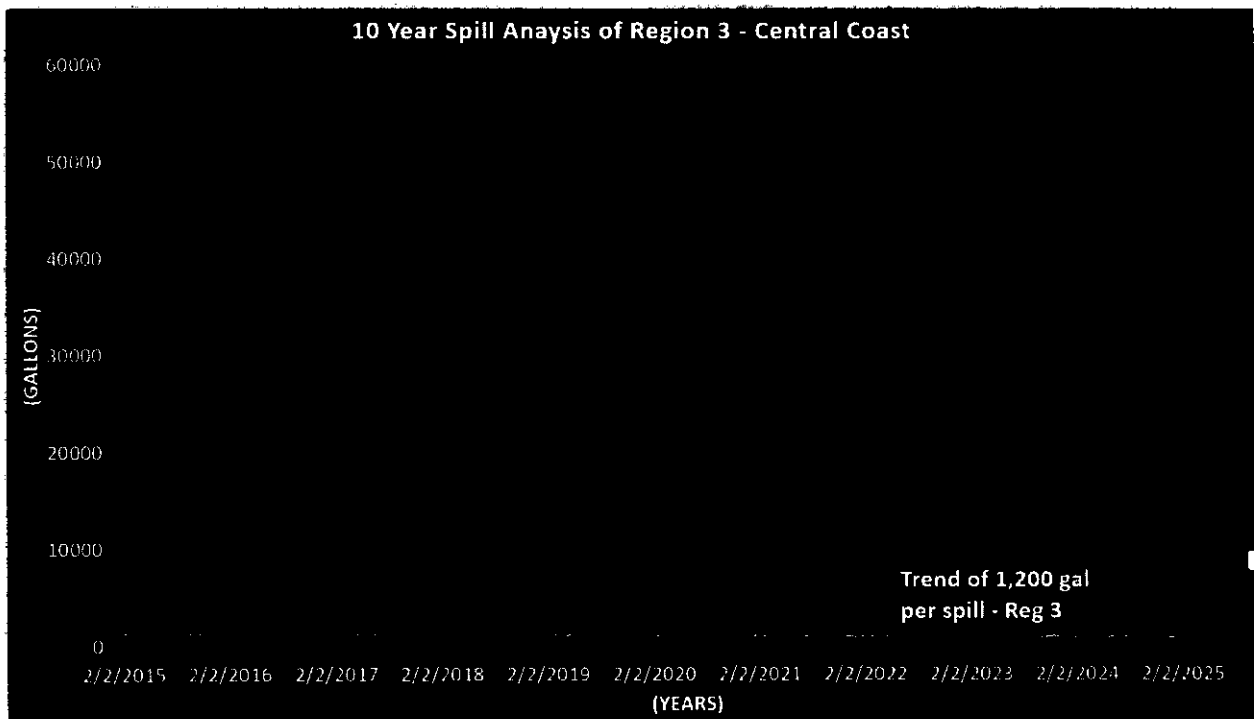
Wastewater System Information: San Miguel Community Services District (SMCSD) is located at the northern most point of San Luis Obispo County and owns and operates one wastewater treatment facility and 8.9 miles of gravity sewer pipe, 60% of the system is composed of VCP and 40% is composed of HDPE and PVC. SMCSD owns two lift stations, one is located centrally at their wastewater treatment facility and is used to pump sewage to the ponds at the treatment facility, and one is located to the south of the sewer system at 942 Soka Way (Tract 2527). Additionally, SMCSD also owns 140 maintenance holes and 39 cleanouts.



See below for an illustration and description of the San Miguel Community Services Districts implementation and effectiveness:

CIWQS System Performance – Graphical illustration of system performance on spills (10 years), data downloaded from CIWQS system performance analysis:





The above illustration correlates data sets for system performance in relation to all other agencies located within Region 3 according to the “SSS Incident Map” data provided by the State Water Resource Control Board.

- In comparison to other Region 3 agencies, SMCSD is performing excellent.
- For the past 10 years the SMCSD has had zero spills of the 111 spills that occurred in Region 3, which were Category 1-3.
- **For the year 2024 Region 3:** 10 agencies have reported a total of 10 spills, and of those 10 spills, SMCSD has contributed zero spills.
- **For the year 2023 Region 3:** 5 agencies have reported a total of 5 spills, and of those 5 spills, SMCSD has contributed zero spills.
- The average spill by volume per spill event is equal to 1,200 gallons for Region 3.

SMCSD is among a very few agencies who have achieved a 0-spill history which is further evidence of their program’s implementation and effectiveness in preventing spills.

According to the State Water Resource Control Boards data table from 2014-2015, data exhibits a trend of 4.61 spills per 100 miles of sewer main for Region 3, the SMCSO has had zero spills in its history, see below for illustration from the SWRCB website:

https://www.waterboards.ca.gov/about_us/performance_report_1415/plan_assess/12411_sso_sewage_volume.shtml

The California Water Boards' Annual Performance Report - Fiscal Year 2014-15

PLAN AND ASSESS: SEWAGE SPILLS



GROUP: SANITARY SEWER OVERFLOWS (Collection Systems)	MEASURE: SIZE OF SEWER SYSTEMS SEWAGE SPILLS			
MESSAGE: <i>Approximately 44 percent of the collection systems regulated under the SSO program reported one or more sewage spill during FY 2014-15.</i>	KEY STATISTICS FOR FY 2014-15			
	<table border="1" style="width: 100%;"> <tr> <td>Number of SSO Events:</td> <td style="text-align: right;">4,580</td> </tr> <tr> <td>Volume of Sewage Spills (gallons):</td> <td style="text-align: right;">11,327,150</td> </tr> </table>	Number of SSO Events:	4,580	Volume of Sewage Spills (gallons):
Number of SSO Events:	4,580			
Volume of Sewage Spills (gallons):	11,327,150			

MEASUREMENTS - Data last updated on: 10-17-2015 (2:54 pm)

Region	Miles of Gravity Sewer (Enrollees Reporting Spills)	Miles of Pressure Sewer (Enrollees Reporting Spills)	Total Size of Collection System (Miles) (Enrollees Reporting Spills)	Facilities With 1 or More Sewage Spill	Number of SSO Events	Volume of SSOs (gallons)	Average SSOs per 100 miles	Average Volume of Spills per 100 miles (gallons)	SSO Events per Facility with Spills
1	1,945	137	2,082	27	71	214,936	3.41	10,324	2.63
2	15,789	424	16,213	98	1,173	6,217,807	7.23	38,351	11.97
3	4,109	252	4,361	45	201	466,013	4.61	10,686	4.47
4	20,784	226	21,010	77	448	858,378	2.13	4,086	5.82
5	21,624	1,063	22,687	121	2,248	1,434,647	9.91	6,324	18.58
6	3,770	150	3,920	26	85	331,683	2.17	8,461	3.27
7	2,797	213	3,010	10	22	226,150	0.73	7,513	2.20
8	13,979	522	14,501	43	142	883,282	0.98	6,091	3.30
9	10,407	443	10,850	34	190	694,254	1.75	6,399	5.59
TOTAL	95,204	3,430	98,634	481	4,580	11,327,150	4.64	11,484	9.52

List methods and developments of new emerging technologies and their impact on reducing spill quantities and spill count:

Annual Hydro-Jet Program – Every year SMCSD utilizes modern hydro-jet equipment and hydro-jets(flushes) every section of sewer main and ensures capacity is maintained and condition is well kept.

5-Year CCTV Inspection – Every 5 years SMCSD’s sewer system is CCTV inspected for condition and capacity utilizing NASSCO PACP standards which are recognized nationally and with acceptance by many engineering associations. This inspection program keeps SMCSD staff informed of changes and new developments throughout its service area.

SCADA System – Remote SCADA Systems provide advanced monitoring and control for the two SMCSD owned sewer lift stations: SCADA (By Tesco). SMCSD has deployed telemetry systems upgrades to increase visibility as well as monitoring, remote operations, and response capabilities with the latest in SCADA system technologies available. Pump run time, motor starts/stops, amperage as well as other features are all be monitored remotely. Additionally, trends are visible to allow operators to be aware of early detection with system concerns. Since installation, the SCADA System has recorded and notified operators of concerns about pump efficiency and malfunctions, this has prevented system failures from occurring and also prevented a loss of service to rate payers. This system enhancement also frees up staff time to schedule preventative maintenance versus emergency responses and reduces costs.

Geographical Information System (GIS) – Purchased and implemented by the SMCSD, SMCSD GIS has been utilized for record keeping and maintenance tracking. As well as asset identification and planning. GIS layer development completion is anticipated in 2026.

SMCSD GIS has become an integral component for the SMCSD and is essential for tracking maintenance metrics for sewer lines flushed, CCTV inspections, lift station inspection, asset identification, and flow direction.

Audit Item 2

Evaluate the Enrollee's compliance with this General Order:

1. List compliance requirements:
 - a. Annual Reports submission current: ✓
 - i. Last Annual Report submitted: 3/31/25.
 - b. Monthly no-spill certification submitted regularly by Special District Staff. ✓
 - i. Verified by Engineered Utility Solutions LLC.
 - c. Audits submitted: ✓
 - i. Last Audit report submitted: 3/26/2025.
 - d. Sewer System Management Plan - Updates submitted: ✓
 - i. Date of last submission: 4/17/2023
 - e. Annual spill training completed: ✓
 - i. See attached below.
 - f. Designated Legally Responsible Official in CIWQS: ✓
 - i. Kelly Dodds – General Manager (Effective date 07/11/2011)
2. Level of completion towards requirements: ✓
 - a. 100% level of completion for all State Water Resource Control Board's Goals.
3. Progress towards completion of goals: ✓
 - a. The San Miguel Community Services District has made great progress in their many years of sewer system operations and this evident with them not having a system owned Category 1 spill in its history. SMCSO has complied with all necessary requirements of the State Water Resource Control Board regarding their sewer system.


Audit Item 3

Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State:

Current deficiencies of on-going spills and deficiencies of discharges of waters to the state:

None to report at this time, please see current SWRCB page below: ✓

[California Home](#)


CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
STATE WATER RESOURCES CONTROL BOARD

California Integrated Water Quality System Project (CIWQS)

Facility At-A-Glance Report

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

SEARCH CRITERIA: [\[REFINE SEARCH\]](#) | [\[NEW SEARCH\]](#) | [\[GLOSSARY\]](#)

DRILLDOWN HISTORY: [\[BACK TO FACILITY LIST\]](#)
 Place ID 631749

General Information						
Region	Place ID	Place Name	Place Type	Place Address	Place County	
3	631749	San Miguel CSD CS	Collection_System	P.O. Box 180 San Miguel, CA, 93451	San Luis Obispo	

Related Parties						
Party	Party Type	Party Name	Role	Classification	Relationship Start Date	Relationship End Date
634328	Person	Mariah Flett	Is A Data Submitter For		02/14/2025	
649029	Person	Kayla Bernal	Is A Data Submitter For		01/31/2025	
558510	Person	Cara Aguilar	Is A Data Submitter For		01/30/2025	
550177	Person	David Tracey	Is A Data Submitter For		02/24/2015	04/05/2023
527750	Person	Roland Snow	Is Onsite Manager For		07/11/2011	
527751	Person	Kelly Dodds	Is Onsite Manager For		07/11/2011	
376424	Person	Barry Holmes	Is Onsite Manager For		05/01/2007	02/04/2014
300137	Person	J.M. Ellison	Is Onsite Manager For		04/06/2006	02/04/2014
39805	Organization	San Miguel CSD	Owner	Special District	04/06/2006	

Total Related Parties: 9

Regulatory Measures									
Reg Measure ID	Reg Measure Type	Region	Program	Order No.	WDID	Effective Date	Expiration Date	Status	Amended?
299941	Enrollee	3	SSOMUNISML	2022-0103-DWQ	3SSO10321	05/01/2007		Active	N

Total Reg Measures: 1

Violations						
Violation ID	Occurred Date	Violation Type	(+) Violation Description	Corrective Action	Status	Classification
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.

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
Total Inspections: 0					
Last Inspection: None					

Audit Item 4

Identify necessary modifications to the Sewer System Management Plan to correct deficiencies.

SSMP Element Deficiencies Listed by Element

Element 1 - SSMP Goal and Introduction:

- Organizational statement for “(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.”
- **Sub Element 1.1:** Include updated regulatory context which includes the re-issued WDR “General Order 2022-0103” and certification letter.
- **Sub Element 1.2:** Need to list SSMP update schedule.
- **Sub Element 1.3:** Sewer system asset overview needs update including metrics for population and data management systems.

Element 2 - Organization:

- Update contact information for organization.
- Update contact information for data submitters and alternate LRO.
- Update responsibility by element table.
- Update chain of communication for reporting spills to include updates from the re-issued WDR “General Order 2022-0103”.

Element 3 - Legal Authority:

- Updated, no deficiencies identified.

Element 4 - Operation and Maintenance Program:

- **Sub Element 4.1:** Provide updated map of the Sanitary Sewer System.
- **Sub Element 4.2:** Identify force main maintenance at the Soka Way lift station.
- **Sub Element 4.3:** Training program needs to be provided on a regular basis and formalized, covering updated WDR, spill estimation and reporting procedures.
- **Sub Element 4.4:** Updated, no deficiencies identified.

Element 5 – Design and Performance Provisions:

- **Sub Element 5.1:** Updated, no deficiencies identified.
- **Sub Element 5.2:** Updated, no deficiencies identified.

Element 6 – Spill Emergency Response Plan:

- Currently being updated and will be included in upcoming SSMP update.

Element 7 – Sewer Pipe Blockage Control Program:

- Updated, no deficiencies identified.

Element 8 – System Evaluation, Capacity Assurance and Capital Improvements:

- **Sub Element 8.1:** Evaluation of the sanitary sewer system.
- **Sub Element 8.2:** Reference master plan and dry/wet weather impacts as well as system capacity.
- **Sub Element 8.1:** Updated, no deficiencies identified.
- **Sub Element 8.4:** Update capital improvement plan based on updated master plan.

Element 9 – Monitoring, Measurement and Program Modifications:

- Updated, no deficiencies identified.

Element 10 – Sewer System Management Plan Audits:

- Updated, no deficiencies identified.

Element 11 – Communication Plan:

- SSMP updates and audits are being communicated regularly at agency board meetings.
- Owners/operators of systems that connect into the enrollee's system, including satellite systems, for: Not applicable.
- Staff has received training and has included documentation as for reference.

Audit Item 5

Audit findings and recommended corrective actions:

Based on the Audit conducted, the following findings and recommended corrective actions are provided:

Element 1 - SSMP Goal and Introduction:

- Organizational statement for “(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.”
 - **Will update to include modified language.**
- **Sub Element 1.1:** Include updated regulatory context which includes the re-issued WDR “General Order 2022-0103” and certification letter from SWRCB.
 - **Will update to include language from Re-issued WDR.**
- **Sub Element 1.2:** Need to list SSMP Update Schedule from SWRCB page.
 - **Will obtain data table from SWRCB website.**
- **Sub Element 1.3:** Sewer System Asset Overview needs update including metrics for population and data management systems.
 - **Will update metrics with data available.**

Element 2 - Organization:

- Update contact information for organization.
 - **Will update contact information.**
- Update contact information for Data Submitters and alternate LRO.
 - **Will update LRO/DS information.**
- Update responsibility by element table.
 - **Update element table to include updated sections.**
- Update chain of communication for reporting spills to include updates from the re-issued WDR “General Order 2022-0103”.
 - **Will update chain of reporting to include new reporting guidelines from the SWRCB.**

Element 3 - Legal Authority:

- Updated, no deficiencies identified.

Element 4 - Operation and Maintenance Program:

- **Sub Element 4.1:** Provide updated map of the Sanitary Sewer System.
 - **Will obtain and include from upcoming Master plan in 2026.**
- **Sub Element 4.2:** Identify force main and maintenance at the Soka Way lift station.
 - **Will identify in updated SSMP.**
- **Sub Element 4.3:** Training program needs to be provided on a regular basis and formalized, covering updated WDR, spill estimation and reporting procedures.

- Management will have staff attend one training event per year as recommended by the SWRCB.
- **Sub Element 4.4:** Updated, no deficiencies identified.

Element 5 – Design and Performance Provisions:

- **Sub Element 5.1:** Updated, no deficiencies identified.
- **Sub Element 5.2:** Updated, no deficiencies identified.

Element 6 – Spill Emergency Response Plan:

- Currently being updated and will be included in upcoming SSMP update.
 - **See updated Spill Emergency Response Plan.**

Element 7 – Sewer Pipe Blockage Control Program:

- Updated, no deficiencies identified.

Element 8 – System Evaluation, Capacity Assurance and Capital Improvements:

- **Sub Element 8.1:** Evaluation of the sanitary sewer system.
 - **See Master Plan attachment.**
- **Sub Element 8.2:** Reference master plan and dry/wet weather impacts as well as system capacity.
 - **See Master Plan attachment.**
- **Sub Element 8.1:** Updated, no deficiencies identified.
- **Sub Element 8.4:** Update capital improvement plan based on updated master plan.
 - **See Master Plan attachment.**

Element 9 – Monitoring, Measurement and Program Modifications:

- Updated, no deficiencies identified.

Element 10 – Sewer System Management Plan Audits:

- Updated, no deficiencies identified.

Element 11 – Communication Plan:

- SSMP Updates and Audits are being communicated regularly at Agency Board meetings.
 - **See last Board Report discussing SSMP adoption date.**
- Are there Owners/operators of systems that connect into the Enrollee's system, including satellite systems, for.
 - **Not applicable.**
- Staff has received training and has included documentation as for reference.
 - **See attached training reference.**

Audit Item 6

A statement that sewer system operator's input on the audit findings has been considered:

The following operators feedback has been included in the development of this Audit: ✓

Date management met with all staff to gather feedback: 10/27/2025

The following SMCSD staff were included in the meeting and the contractors were consulted afterwards with the General Manager:

1. Kelly Dodds – General Manager (Legally Responsible Official)
2. Joe Martines – Field Operator Lead
3. Mariah Fluitt – Fluid Resource Management - Contractor (Data Submitter)
4. Kayla Bernal – Fluid Resource Management - Contractor (Data Submitter)
5. Cara Aguilar – Fluid Resource Management - Contractor (Data Submitter)
6. Carinna Ellison – Fluid Resource Management - Contractor

Audit Item 7

A proposed schedule for the Enrollee to address the identified deficiencies:

The following list of deficiencies will be corrected by 12/31/2025:

- Update organizational statement.
- Updated regulatory context.
- List SSMP update schedule.
- Update Sewer System Asset Overview.
- Update contact information for organization.
- Update contact information for Data Submitters and alternate LRO.
- Update responsibility data table.
- Update chain of communication for reporting spills.
- Provide updated map of the Sanitary Sewer System.
- Identify force main and maintenance with new Soka Way lift station.
- Formalize spill response and reporting training program.
- Update Spill Emergency Response Plan.
- Updated Evaluation of Sanitary Sewer System.
- Master plan data on dry/wet weather impacts on system.
- Updated capital improvement plan based on updated master plan.
- Include Board Report adopting SSMP.
- Include staff training documentation.

Certification Statement

Required per the State Water Resource Control Boards re-issued order: Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ December 6, 2022.

Section 5.9. Reporting Certification:

The Legally Responsible Official shall electronically certify, on the Enrollee's behalf, all applications, reports, the Sewer System Management Plan(s) and corresponding updates, and other information submitted electronically into the online CIWQS Sanitary Sewer System Database, as follows:

"I certify under penalty of perjury under the laws of the State of California that the electronically submitted information was prepared under my direction or supervision. Based on my inquiry of the person(s) directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete, and complies with the Statewide Sanitary Sewer Systems General Order. I am aware that there are significant penalties for submitting false information."

Legally Responsible Official: Kelly Dodds (General Manager)

Date:

*Note: Hardcopy submittals to the State Water Board must be accompanied by the above certification statement.