



**Cuesta Community College District
Sewer System Management Plan, Revision 2 – May 2018
Audit Report**

March 2021

Prepared by:



WALLACE GROUP®

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Brian McAlister

Interim Director of Facilities, Maintenance, Operations & Grounds – Cuesta College

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SCOPE AND PURPOSE

The State Water Resources Control Board (SWRCB) Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003-DWQ as amended by WQ 2013-0058-EXEC (herein SSSWDR Orders) require municipalities that own or operate sanitary sewage collection systems greater than one mile in length to implement and maintain a Sewer System Management Plan (SSMP). The Cuesta Community College District (Cuesta) sewage collection system is greater than one mile in length therefore the Cuesta is required to comply with the terms of the Statewide Order.

The Cuesta has contracted with Wallace Group to complete an Audit of current SSMP in order to evaluate the effectiveness of the SSMP and its implementation.

The SSMP Audit measures compliance with section D.13 of the SSSWDR Orders and the effectiveness of Cuesta's implementation of the current certified SSMP; Revision 2 dated May 2018.

- 1.0 [SSSWDR, Section D.13.i]: Goals
- 2.0 [SSSWDR, Section D.13.ii]: Organization
- 3.0 [SSSWDR, Section D.13.iii]: Legal Authority
- 4.0 [SSSWDR, Section D.13.iv]: Operation and Maintenance Program
- 5.0 [SSSWDR, Section D.13.v]: Design and Performance Provisions
- 6.0 [SSSWDR, Section D.13.vi]: Overflow Emergency Response Plan
- 7.0 [SSSWDR, Section D.13.vii]: Fats, Oils, and Grease Control Program
- 8.0 [SSSWDR, Section D.13.viii]: System Evaluation and Capacity Assurance Plan
- 9.0 [SSSWDR, Section D.13.ix]: Monitoring, Measurement, and Program Modifications
- 10.0 [SSSWDR, Section D.13.x]: Sewer System Management Plan Program Audits
- 11.0 [SSSWDR, Section D.13.xi]: Communication Program

AUDIT FORMAT

This SSMP Audit separately evaluates each SSMP Section using the following format:

- Applicable SSSWDR Section
- Audit Finding
- Ranking
- Reference Information
- Deficiencies
- Recommended steps and schedule to correct Deficiencies

The ranking criteria utilized in the Audit are provided in Table 1 below:

Table 1: SSMP Audit Ranking Criteria

Ranking	Ranking Basis
In Compliance	All requirements specified in the section are met.
Substantial Compliance	The majority of requirements in the section are met.
Partial Compliance	Half of the requirements in the section are met
Marginal Compliance	Less than half of the requirements in the section are met.
Out of Compliance	None of the requirements in the section are met.

SSMP AUDIT PARTICIPANTS AND SCHEDULE

This SSMP Audit assesses the effectiveness of the District’s SSMP Revision 2, dated May 2018, and compliance with the SSSWDR Section D.13 requirements. The purpose of the Audit is to recognize accomplishments, identify deficiencies, and recommend corrective actions and a schedule to complete them. The Audit was conducted by the following Wallace Group Staff:

- Bill Callahan
Senior Environmental Compliance Specialist

Cuesta Staff participating in the SSMP Audit were:

- Brian McAlister
Director of Facilities Services, Planning, Capital Projects, Maintenance, Operations & Grounds – Cuesta College
- Jacob Parsons
Safety Compliance Coordinator – Cuesta College
- Nikki Rocha
Facilities Services Department Assistant – Cuesta College

The SSMP Audit was conducted in February & March 2021; the following table summarizes key dates and locations:

Table 2: Cuesta College SSMP, Revision 2 – 2021 Audit Key Dates

Date	Location	Topic	Staff
1/5/21	WG Office	Submitted Data and Records Request to District.	Bill Callahan, Jake Parsons, Nikki Rocha
2/9/21	Cuesta Facility Maintenance Office	SSMP Audit Kick Off, SSMP Data and Records Request reviewed and records gathered, begin drafting Audit Report.	Bill Callahan, Jake Parsons, Nikki Rocha, Brian McAlister
2/26/21	Cuesta Facility Maintenance Office	SSMP Draft Audit Report Submitted for Review	Bill Callahan, Brian McAlister, Jake Parsons, Nikki Rocha
3/X/21	Cuesta Facility Maintenance Office	SSMP Audit Final Report	Brian McAlister Certification of report.

CUESTA 2021 SSMP AUDIT RESULTS

The SSMP Audit resulted in a finding that the Cuesta College SSMP dated May 2018 is in full compliance with five (5) out of eleven (11) subsections (elements) of SSSWDR Section D.13 and in substantial compliance with three (3), in partial compliance with two (2) of these elements and in marginal compliance with one (1) of these elements. Cuesta has been substantially effective in the implementation of the SSMP.

A summary of the results is presented in Table 3 below:

Table 3: Cuesta College SSMP Revision 2 - Audit Results 2021

SSSWDR Section D.13	SSMP Compliance with Required Subsection	Cuesta Effectiveness in the Implementation of SSMP Subsections	Schedule
1.0 Goals [SSSWDR D.13(i)]	In Compliance	Cuesta has been effective in meeting the stated Goals for this Element.	N/A
2.0 Organization [SSSWDR D.13(ii)]	Partial Compliance	Cuesta has been effective in implementing this section; however, updates should be completed to keep relevant information regarding staff positions up to date.	Monitor and update all Cuesta and Contracted staff contact information on an ongoing basis so this information is current and up to date. Include all wastewater staff names, phone numbers and positions in future updates to the SSMP.
3.0 Legal Authority [SSSWDR D.13(iii)]	In Compliance	Cuesta is a self-regulating entity that maintains the required legal authorities to manage discharges to the Public Sewers.	N/A
4.0 Operation and Maintenance Program [SSSWDR D.13(iv)]	Substantial Compliance	Cuesta was substantially effective in implementing this section.	Establish if and where additional CCTV and line cleaning work is needed. If additional work is required, complete and analyze data for future Rehabilitation and

SSSWDR Section D.13	SSMP Compliance with Required Subsection	Cuesta Effectiveness in the Implementation of SSMP Subsections	Schedule
			Replacement Projects and areas for future maintenance.
5.0 Design and Performance Provisions [SSSWDR D.13(v)]	In Compliance	Cuesta has been effective in implementing these standards, for CIP projects.	N/A
6.0 Overflow Emergency Response Plan [SSSWDR D.13(vi)]	Substantial Compliance	Cuesta has been effective at implementing a comprehensive Emergency Response Program through review of SSO Emergency Response Procedures. Continue to train staff on this program and the associated procedures annually. Document all staff training.	N/A
7.0 Fats, Oils and Grease (FOG) Control Program [SSSWDR D.13(vii)]	In Compliance	N/A – No FOG Control Program necessary at this time.	A FOG Control Program is not anticipated as being necessary in the future since there is only one (1) Food Service Establishments (FSEs) on Campus.
8.0 System Evaluation and Capacity Assurance Plan (SECAP) [SSSWDR D.13(viii)]	Substantial Compliance	Cuesta was effective at implementing this section as identified in the 2018 SSMP by conducting CCTV investigations and evaluations on the system. Additional efforts should be implemented to complete CCTV investigations if warranted. When all	Develop a plan to assess investigative efforts (CCTV and other inspections and monitoring) to assess the need for future capacity related CIP in 2021.

SSSWDR Section D.13	SSMP Compliance with Required Subsection	Cuesta Effectiveness in the Implementation of SSMP Subsections	Schedule
		CCTV data is collected. Analyze and identify areas where there may be capacity deficiencies and develop a budget and schedule to address these areas.	
9.0 Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]	Partial Compliance	Cuesta was partially effective at implementing this section as identified in the 2018 SSMP	Implement tasks identified in this Element annually.
10.0 SSMP Program Audits [SSSWDR D.13(x)]	In Compliance	Cuesta has been effective at implementing this section. The last SSMP Audit was due on or before May 2, 2019 and was completed in March 2019. The current Audit is anticipated to be completed in February 2021.	Include the 2021 SSMP Audit Report in the appendix to the SSMP.
11.0 Communication Program [SSSWDR D.13(xi)]	Marginal Compliance	Cuesta was not effective in implementing this section of the SSMP. 3 of the 4 tasks identified for implementation were not completed.	Implement and document Communication Program efforts in the appendix of the SSMP.

The following sections describe these observations in detail and address future additions and updates the Cuesta is required to make to its SSMP. The above list of updates is a summary and is not intended to replace the details identified in the SSMP Audit Report. ***The entire SSMP Audit Report recommendations are recommended to be implemented in a reasonable time frame, which should be included in the next revision/update to the SSMP to ensure compliance with the SSS WDR Orders.***

Additional Administrative Recommendations

- 1) The District has made efforts to correct CIWQS LOR information to document Relationship End Dates. As of the date of this report, this has not been corrected. The

District should follow up with the State Water Resources Control Board to ensure CIWQS is reflective of current staff roles and responsibilities.

- 2) The District should consider assigning an additional Legally Responsible Official (LRO) in CIWQS for redundancy. Additionally, the District should assign Data Submitters in CIWQs to assist with SSO data submittal and other CIWQs tasks.
- 3) North County Campus: while a separate SSMP is not required for this facility, the District should ensure staff is aware of SSO response procedures for sections of the sewer system owned by the District in the event of a SSO.

Sanitary Sewer Overflow (SSO) Data

The table below shows the District is below the State averages for Category 2 and Category 3 SSOs and above State averages for Category 1 SSOs:

Comparison to State Schools 2010 – 2020

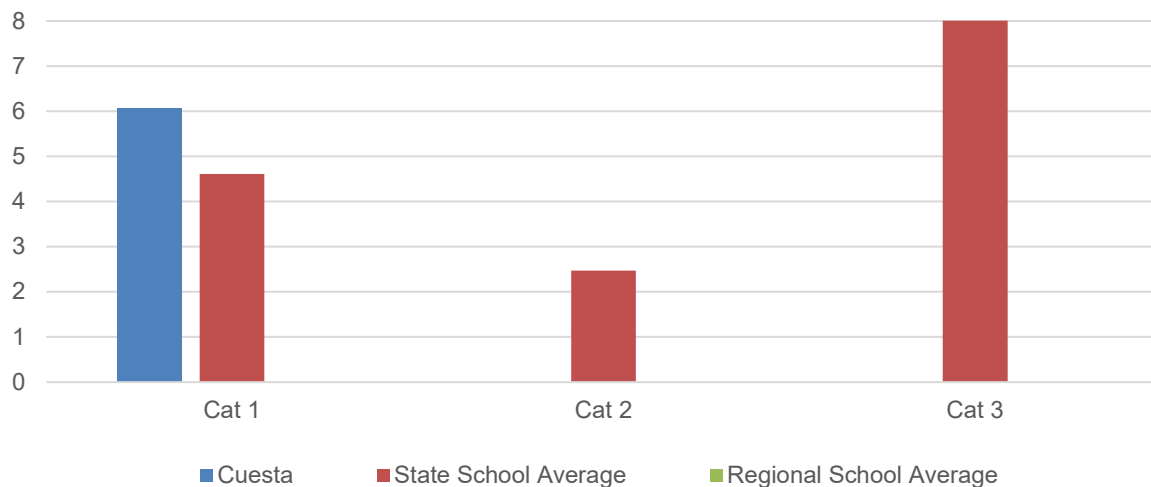
Spill Rate: Number of Spills per 100 miles of Pipe per Year			
	Category 1	Category 2	Category 3
Cuesta	6.06	0	0
State School Average	4.61	2.47	9.0
Regional School Average <i>CIWQS does not provide Regional Data for State Schools</i>	N/A	N/A	N/A

Category 1 = Spills of any volume that reach surface water.

Category 2 = Spills greater than or equal to 1,000 gallons that do not reach surface water.

Category 3 = Spills less than 1,000 gallons that do not reach surface water.

Number of Spills per 100 Miles of Pipe

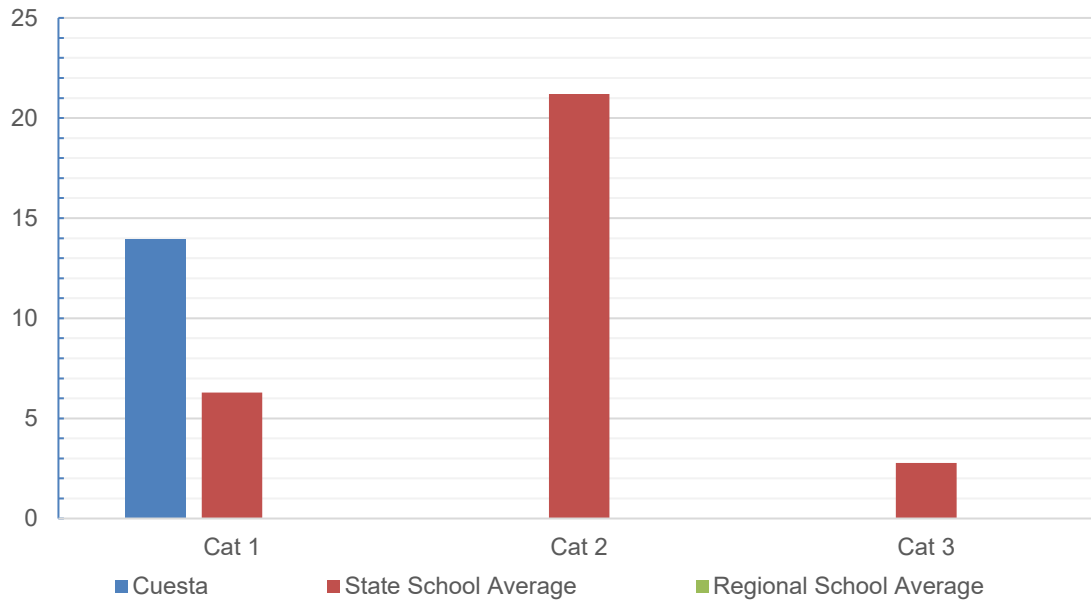


Comparison to State Schools 2010 – 2020

Net Volume of Spills in gallons per Capita per Year			
<i>Net Volume (volume spilled minus volume recovered) of SSOs, for which the reporting Enrollee is responsible, per capita (i.e. the population served by your agency's sanitary sewer system), per year.</i>			
	Category 1	Category 2	Category 3
Cuesta	13.98	0	0
State School Average	6.29	21.2	2.77
Regional School Average <i>CIWQS does not provide Regional Data for State Schools</i>	N/A	N/A	N/A

*Category 1 = Spills of any volume that reach surface water.
 Category 2 = Spills greater than or equal to 1,000 gallons that do not reach surface water.
 Category 3 = Spills less than 1,000 gallons that do not reach surface water.*

Spill Volume Comparison



1.0 Goal [SSSWDR D.13(i)]

SSSWDR D.13(i) states:

The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.

Section D.13(i): The Cuesta SSMP, Revision 2 dated May 2018 includes three (3) goals as listed below.

1. Maintain or improve the condition of the collection system infrastructure to provide reliable service now and into the future.
2. To provide adequate capacity to convey peak dry weather and wet weather wastewater flows.
3. Minimize the number and impact of Sanitary Sewer Overflows (SSOs).

Sufficiency: In Compliance

Reference: Cuesta SSMP, Revision 2, May 2019 Page 10.

Deficiencies: None - a review of Cuesta's CIWQS report 1/25/21 shows no SSOs since the last update of the District's SSMP.

Recommendation: Formally document and evaluate District progress in meeting these goals. Deliver a formal report documenting progress to the Board of Directors annually. Adjust goals as necessary so they continue to be relevant to the District's system and operations.

2.0 Organization [SSSWDR D.13(ii)]

SSSWDR D.13(ii) states:

The SSMP must identify:

- (a). The name of the responsible or authorized representative as described in Section J of this Order;
- (b). The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation; and
- (c). The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services).

Finding: *Section D.13 (ii)(a)*: The Director of Maintenance, Operations and Grounds; Terry Reece is the named Legally Responsible Official (LRO) for Cuesta College. Terry is no longer with the District and a new LRO should be identified in the SSMP and in CIWQS.

Conclusion: The section above out of compliance with *Section D.13 (ii)(a)*.

Finding: *Section D.13(ii)(b)*: The names and telephone numbers of staff responsible for implementation of the SSMP are included on pages 14 – 16 of the SSMP and in Appendix B. Figure 2-1 and Table 2-1 demonstrate SSMP organization chart and roles and responsibilities. The District has recently had several maintenance staff and administrative staff retire or who are extended leave of absence, leaving many of the positions with SSMP responsibility vacant. These areas of this element should be updated when new staff are hired. Remaining staff should be assigned vacant staff's roles and responsibilities pertaining to the SSMP.

Conclusion: The section above is in partial compliance with *Section D.13(ii)(b)*.

Finding: *Section D.13(ii)(c)*: A chain of communication for reporting sanitary sewer overflows (SSOs) is provided on Page 17 of the SSMP. Figure 2-1, Chain of Communication for Responding to Sewer System Overflows, provides a flowchart of how the SSO chain of communication works. The chain of communication and summary of SSO response includes information required in the 2013 Monitoring and Reporting (MRP) requirements. These amendments identify three Categories of SSOs rather than two and now require all spill information to be reported to Cal OES. The chain of communication should be reviewed to confirm phone contact information is accurate as new staff have assumed Director and supervisory roles.

Conclusion: The section above is in partial compliance with *Section D.13(ii)(c)*. See recommendations below.

Sufficiency: In Partial Compliance

Reference: Cuesta SSMP 2018, Revision 2, Pages 12 -18, SSMP Appendix A, CIWQS Facility At-A-Glance Report (1/25/21).

Deficiencies: N/A

Recommendation: Update this Element of the SSMP with current staff contact information and staff roles and responsibilities. Monitor and update all Cuesta and Contract staff contact information on an ongoing basis so this information is current and up to date. Include all wastewater staff names, phone numbers and positions in future updates to the SSMP.

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3.0 Legal Authority [SSSWDR D.13(iii)]

SSSWDR D.13(iii) states:

Each Enrollee must demonstrate, through sanitary system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to:

- (a). Prevent illicit discharges into its sanitary sewer system (examples include I/I, storm water, chemical dumping, unauthorized debris and cut roots, etc.);
- (b). Require that sewers and connections be properly designed and constructed;
- (c). Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;
- (d). Limit the discharge of fats, oils, and grease and other debris that may cause blockages; and
- (e). Enforce any violation of its sewer ordinances.

Finding: *Section D.13(iii)(a-e)*: The Cuesta Community College District is a self-regulating Community College within the California Community College system, with publicly elected officials as its governing Board. Under this authority, the District/Cuesta College has legal authority to:

- Prevent illegal discharges into its system (e.g., storm water or chemical dumping).
- Require that sewers and connections be properly designed and constructed.
- Ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated laterals).
- Ensure access for maintenance, inspection, or repairs of all portions of the system operated by the District.
- Limit fats and greases and other debris that may cause blockages in the collection system.

Conclusion: The section above is in compliance with *Section D.13(iii)(a-e)*.

Sufficiency: In Compliance

Reference: Cuesta May 2018 SSMP, Revision 2, Pages 20 – 21.

Deficiencies: None.

Recommendation: None.

4.0 Operation and Maintenance Program [SSSWDR D.13(iv)]

SSSWDR D.13(iv) states:

The SSMP must include those sections listed below that are appropriate and applicable to the Enrollee's system:

- (a). Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable storm water conveyance facilities;
- (b). Describe routine preventive and operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) Program should have a system to document scheduled and conducted activities, such as work orders;
- (c). Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed to the capital improvement plan;
- (d). Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained; and
- (e). Provide equipment and replacement part inventories, including identification of critical replacement parts.

Finding: *Section D.13(iv)(a)*: All major sewer assets and appurtenances are identified in Cuesta's GIS Sewer Atlas Map referenced in the May 2018 SSMP. This mapping system also includes a storm water collection conveyance layer, showing storm water assets that may be impacted by a SSO. An example of the sewer and storm drain atlases are included in Appendix B. The sewer system has not undergone any changes since 2011 therefore the current version of the sewer system atlas is up to date.

Conclusion: The section above is in compliance with *Section D.13(iv)(a)*. See recommendations section below.

Finding: *Section D.13(iv)(b)*: The May 2018 SSMP summarizes goals and Routine Preventative Operation and Maintenance (O&M) for Pipelines and Manholes.

The current SSMP identifies a sewer line cleaning schedule as being conducted on an “as needed” basis. In 2017 the District executed Cleaning and CCTV in significant portions the collection and conveyance system. The District developed a template to document findings observed during line cleaning and manhole inspections as part of the 2018 SSMP Update. Records demonstrating sewer line cleaning and inspections were reviewed along with an evaluation of CCTV results as part of this audit. Work orders are discussed as a method of scheduling and documenting sewer O&M activities. The District reported that there have been no work orders generated for the sewer system as no non-routine required maintenance activities were identified in the past 2 years.

The District completed CCTV investigations in most of the trunk lines in the system in 2017 and had plans to complete an assessment of this data in a final report scheduled for completion in 2020. It is unclear as of the date of this audit if these additional CCTV investigations were completed and if projects were identified because of these investigations.

The results of future sewer line cleaning, manhole inspections and CCTV investigations should be tracked and included in the SSMP on an annual basis. Templates provided in the SSMP should be used for the inspection of all sewer assets. Summaries should include flow conditions, cleaning activities and their effectiveness, and the physical condition of each manhole. A ranking system should be developed and/or identified for sewer line and manhole evaluations. A summary of; visual and CCTV investigations, sewer line cleaning, and manhole inspection records should be included in the SSMP to assist in the development of future rehabilitation and replacement projects within the collection system.

Conclusion: The section above is in substantial compliance with *Section D.13(iv)(b)*. See recommendations section below.

Finding: *Section D.13(iv)(c)*: The Cuesta SSMP states that 50% of the trunk sewer system was replaced/upgraded in 2011 to address deteriorating portions of the system and areas subject to Inflow and Infiltration (I/I). These projects were based on the results of a Facilities Master Plan study conducted in 2005. A recent Bond Measure was passed for Campus wide infrastructure rehabilitation in the amount of \$ 275 million. The annual Budget based on this source of funding allocates \$225,000 for maintenance and repair throughout the campus. There are currently no specific projects identified in the SSMP as part of the rehabilitation or replacement program or because of District sewer system condition assessments. The District planned to evaluate all inspection data for the sewer system in 2020 and assess the need for rehabilitation and replacement projects at that time. As stated above it is unclear if these activities occurred. The District’s budget for potential rehabilitation and replacement projects was provided in a link to the District’s website:

https://www.cuesta.edu/about/documents/fiscal-docs/Adopted_Budget_2018-2019.pdf.

Conclusion: The section above is in substantial compliance with *Section D.13(iv)(c)*. See recommendations section below.

Finding: *Section D.13(iv)(d)*: The May 2018 SSMP states that staff is trained on new equipment as warranted and individual job descriptions require the skill sets necessary to conduct tasks associated with sewer system O&M. Job descriptions were reviewed during the audit. Staff proficiency is assessed annually during performance reviews. Most of the scheduled system maintenance such as sewer line cleaning and CCTV inspections are completed by outside contractors.

Conclusion: The section above is in compliance with *Section D.13(iv)(d)*. See recommendations section below.

Finding: *Section D.13(iv)(e)*: A list of collection system critical parts and equipment was in Appendix “B” of the SSMP.

Conclusion: The section above is in compliance with *Section D.13(iv)(e)*. See recommendations section below.

Sufficiency: In Substantial Compliance

Reference: Cuesta SSMP Rev 2: May 2018.

Deficiencies: It is unclear if additional CCTV work was completed as stated in the 2018 SSMP.

Recommendation: The following are recommended activities for the future:

- Summarize any additional CCTV and manhole inspection results as they occur over the course of future Fiscal Years.
- Document line cleaning activities and any observations made in the field during line cleaning.
- Develop a formal Rehabilitation and Replacement (R&R) plan that incorporates CCTV sewer line condition assessments and future manhole inspection data. Develop a short- and long-term CIP completion schedule based on the results of these inspections when all data is available (previously identified for completion in 2020).
- Future Budgets should be included in future revisions of the SSMP to identify pending projects for the Fiscal Year.

5.0 Design and Performance Provisions [SSSWDR D.13(v)]

SSSWDR D.13(v) states:

- (a). Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations, and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems; and
- (b). Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects.

Finding: *Section D.13(v)(a)*: Cuesta states in the SSMP that it utilizes: 2011 County of San Luis Obispo Sewer Design Standards and Specifications. A link to these standards and specifications are provided in the SSMP:

- o <http://www.slocounty.ca.gov/PW/DevServ/PublicImprovementStandards.htm>

Copies of applicable Design Standards and Specifications are included in Appendix “C” of the District SSMP.

All design and construction plans for Cuesta sewers are developed by licensed and registered engineers.

Conclusion: The section above is in compliance with *Section D.13(v)(a)*.

Finding: *Section D.13(v)(b)*: Procedures and standards for the acceptance testing and inspection of new and repaired sewer main and appurtenances are also found in the previously mentioned; 2011 County of San Luis Obispo Sewer Design Standards and Specifications. Copies of applicable standards for the acceptance testing and inspection of new and repaired sewer main and appurtenances are included in Appendix “C” of the District SSMP.

Conclusion: The section above is in compliance with *Section D.13(v)(b)*.

Sufficiency: In Compliance

Reference: Cuesta 2018 SSMP and SSMP Appendix “C”: Revision 2, 2011 County of San Luis Obispo Sewer Design Standards and Specifications

Deficiencies: N/A

Recommendation: Update this section of the SSMP if new standards are adopted or the County of San Luis Obispo adopts new standards and specifications.

6.0 Overflow Emergency Response Plan (OERP) [SSSWDR D.13(vi)]

SSSWDR D.13(vi) states:

Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment. At a minimum, the plan must include the following:

- (a). Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner;
- (b). A program to ensure appropriate response to all overflows;
- (c). Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP identifies the officials who will receive immediate notification;
- (d). Procedures to ensure that appropriate staff and contract personnel are aware of and follow the Emergency Response Plan and are appropriately trained;
- (e). Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities; and
- (f). A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated or partially treated wastewater to waters of the United States and minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.

Finding: *Section D.13 (vi)(a):* Cuesta's SSMP provides a comprehensive overview of how notification procedures are followed to ensure primary responders and regulatory agencies are informed of a SSO in a timely manner. Specific procedures related to primary response and regulatory notifications were developed in 2016 and are in Appendix "D" of the District's SSMP. These procedures should be reviewed for accuracy as new staff have been assigned responsibilities for sewer system maintenance and sewer spill response.

Finding: *Section D.13 (vi)(b):* A general description of equipment and actions necessary to respond to a SSO is included in the SSMP. A program and associated organizational flow chart or summary showing key positions and their responsibility to ensure appropriate response to all overflows is included in the OERP, May 2018. This flowchart should be reviewed for accuracy as new staff have been assigned responsibilities for sewer system maintenance and sewer spill response.

Finding: *Section D.13 (vi)(c):* A general description of the current notification process is included in this section of the SSMP and is consistent with State Board Order 2013-0058-EXEC adopted in 2013. Specific procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities were developed in 2016 and are included in Appendix “D” of the District SSMP. Individual emergency operating procedures identified below were reviewed:

- SS-EOP: SSO Notification
- SS-EOP: SSO Reporting

These procedures should be reviewed for accuracy as new staff have been assigned responsibilities for sewer system maintenance and sewer spill response.

Finding: *Section D.13 (vi)(d):* The SSMP includes specific procedures to ensure appropriate staff and contractor personnel are trained on the OERP. The following SSO emergency response procedures were reviewed during the audit:

- SS-EOP: Overflow Emergency Response Plan
- SS-EOP: SSO Training Requirements

These procedures should be reviewed for accuracy as new staff have been assigned responsibilities for sewer system maintenance and sewer spill response.

Finding: *Section D.13 (vi)(e-f):* Procedures to address emergency operations, such as emergency traffic and crowd control, surface water quality monitoring, and other necessary response activities were developed as part of the in the 2016 SSMP Update. Formal procedures that are specific to the Cuesta sewer system were developed, adopted, and incorporated into Cuesta’s Emergency Response Program and referenced in the SSMP. Examples of these procedures are as follows:

- SS-EOP: SSO Traffic and Crowd Control
- SS-EOP: SSO Volume Estimation
- SS-EOP: SSO Mitigation and Cleanup
- SS-EOP: SSO Response Documentation and Records

These procedures should be reviewed for accuracy as new staff have been assigned responsibilities for sewer system maintenance and sewer spill response. Training should occur for staff responsible for responding to and reporting on Sewer System Overflows.

Conclusions: The sections above are in substantial compliance with *Sections D.13 (vi)(a-f)*. See recommendations below.

Sufficiency: In Substantial Compliance

Reference: Cuesta May 2018 SSMP Revision 2, Cuesta Overflow Emergency Response Plan (OERP) and Emergency Operating Procedures.

Deficiencies: These procedures should be reviewed for accuracy as new staff have been assigned responsibilities for sewer system maintenance and sewer spill response. Training should occur for staff responsible for responding to and reporting on Sewer System Overflows.

Recommendation: An emergency response program with associated procedures is included as part of the SSMP. Monitoring and reporting procedures are in compliance with Monitoring and Reporting Requirements adopted in by the State Water Board in 2013. Train staff annually on this OERP and the associated procedures. Update procedures and OERP with new employees responsible for emergency response once appropriately trained after hire. Document all staff training. Update each procedure and the OERP as conditions warrant.

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7.0 Fats, Oils, and Grease (FOG) Control Program [SSSWDR D.13(vii)]

SSSWDR D.13(vii) states:

Each Enrollee shall evaluate its service area to determine whether a FOG control program is needed. If an Enrollee determines that a FOG program is not needed, the Enrollee must provide justification for why it is not needed. If FOG is found to be a problem, the Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system. This plan shall include the following as appropriate:

- (a). An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG;
- (b). A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;
- (c). The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- (d). Requirements to install grease removal devices (such as traps or interceptors) and the development of design standards for such devices, maintenance requirements, BMP requirements, record keeping and reporting requirements;
- (e). Authority to inspect grease producing facilities, enforcement authorities, and whether the Cuesta has sufficient staff to inspect and enforce the FOG ordinance;
- (f). An identification of sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- (g). Development and implementation of source control measures for all sources of FOG discharged to the sewer system for each section identified in (f) above.

After the issuance of the Statewide General WDRs in 2006, Cuesta College determined that FOG is not an on-going problem in the sewer collection system and a FOG Program was not necessary. Cuesta identified one (1) Food Service Establishment in its service area and details the maintenance policy/procedure in place for management of FOG at this location.

Finding: *Section D.13(vii)(a-e)*: N/A

Conclusion: The section above is in compliance with *Section D.13(vii)(a-e)*.

Sufficiency: In Compliance

Reference:

- SSMP Revision 2, May 2018 p. 42-43
- CIWQS SSO Public Report – Cuesta College: Detail Page

Deficiencies: N/A

Recommendation: Monitor the system for potential FOG related Hot Spots and if FOG becomes an issue in the future, identify and implement steps to mitigate FOG within the system. Monitor cleaning frequency for cafeteria interceptor. Typical minimum cleaning frequencies for these devices is quarterly.

DRAFT

8.0 System Evaluation and Capacity Assurance Plan [SSSWDR D.13(viii)]

SSSWDR D.13(viii) states:

The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system sections for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event. At a minimum, the plan must include:

- (a). **Evaluation:** Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to a SSO discharge deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
- (b). **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria; and
- (c). **Capacity Enhancement Measures:** The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding.
- (d). **Schedule:** The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D.14.

Findings: *Section D.13(viii)(a-d):* The Cuesta SSMP discusses the following regarding SECAP efforts:

- Completion of upgrades to approximately 50% of the system trunk lines in 2011, conducted to address defects and I/I which were contributing to capacity restrictions in the system,
- Cuesta's current understanding of the system is that there is now sufficient capacity during both dry and wet weather to safely convey flows now and into the future as the campus is currently at "build out" and the system is performing as designed to meet build out capacity requirements,
- A plan to conduct additional investigations in the newly replaced system and existing system utilizing; visual inspections, CCTV, and flow monitoring data if warranted to

assess additional capacity needs. These investigations and a final report were scheduled for completion by 2020.

Cuesta reports that there are no current capacity restrictions for wet and dry weather and Cuesta has not experienced a Sanitary Sewer Overflow (SSO) due to capacity restrictions since the development of the SSMP. This appears to indicate no additional SECAP activities will be required in the future unless conditions warrant additional monitoring or studies.

Conclusion: The section above is in substantial compliance with *Section D.13(viii)(a-d)*. See recommendations below.

Sufficiency: Substantial Compliance

Reference: Cuesta May 2018 SSMP Rev 2.

Deficiencies: N/A

Recommendation: Continue to update the plan and schedule for completion of the District's CCTV investigations and associated CIP in the future revisions and updates to the SSMP. Assess the need to complete a formal assessment report discussing the condition assessment and capacity analysis which was planned for completion in 2020. IF warranted, include the analysis and plan to fund capital improvement projects if it is determined additional capacity related CIP is necessary in the next update of the SSMP.

9.0 Monitoring, Measurement, and Program Modifications [SSSWDR D.13(ix)]

SSSWDR D.13(ix) states:

The Enrollee shall:

- (a). Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
- (b). Monitoring the implementation and, where appropriate, measure the effectiveness of each section of the SSMP;
- (c). Assess the success of the preventative maintenance program;
- (d). Update program sections, as appropriate, based on monitoring or performance evaluations; and
- (e). Identify and illustrate SSO trends, including: frequency, location and volume.

Finding: *Section D.13(ix)(a):* Cuesta currently maintains relevant information necessary to establish and prioritized SSMP activities in the SSMP through monthly CIWQS reports. As of this date there have been no significant issues that would warrant restructuring of SSMP activities, as there has not been a history of SSOs. When additional maintenance activities begin (line cleaning, manhole assessments and CCTV), these records should be analyzed to determine if future changes are warranted.

Conclusion: The section above is in compliance with *Section D.13(ix)(a)*. See recommendations below.

Finding: *Section D.13(ix)(b) and (c):* In the past Cuesta has evaluated annually the implementation and effectiveness of each section of the SSMP or preventative maintenance activities through a review of CIWQs and Annual Reports however at the time of this Audit it is unclear if these activities have occurred.

Conclusion: The section above is in partial compliance with *Section D.13(ix)(b) and (c)*. See recommendations below.

Finding: *Section D.13 (ix)(d):* Annual reports and evaluations trending Cuesta's performance history have not been completed since the last formal SSMP Update. That being said, the District has not experienced SSOs, sewer related complaints or emergencies since the last update to the SSMP which is an indicator that significant updates to the management plan were not warranted.

Conclusion: The section above in partial compliance with *Section D.13 (ix)(d)*. See recommendations below.

Finding: *Section D.13(ix)(e):* The Cuesta SSMP includes a template/matrix to track the frequency, location, and cause, of SSOs. There have been no SSOs since 2010.

Conclusion: The section above is in compliance with *Section D.13(ix)(e)*. See recommendations below.

Sufficiency: Partial Compliance

Reference: Cuesta SSMP May 2018 Revision 2, CIWQS Report 1/25/21.

Deficiencies: There was no evidence of annual reporting and updates to the District Board of Trustees or implementation of other Communication Plan commitments.

Recommendation: Implement the written program to schedule, track, and evaluate the effectiveness of preventative maintenance for the sanitary sewer system. Review and assess the effectiveness of each SSMP section annually. Update written record of SSO trend evaluation and identification at the end of each calendar year. Complete these plans and records and incorporate them into the update of this SSMP Section. Complete an annual report to the District Board on the results of these evaluations.

10.0 Sewer System Management Plan Program Audit [SSSWDR D.13(x)]

SSSWDR D.13(x) states:

As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. 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 Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

Sufficiency: In Compliance

Reference: Cuesta SSMP May 2018 Revision 2, Page 54-56 and SSMP Audit Report, May 2019.

Deficiencies: The District chose to amend the SSMP Audit schedule based on the original July 2015 completion date. While this amendment is not in compliance with the specific date required based on the SSMP adoption, it appears to be compliant with the intent of the specified Audit requirements. The District's SSMP provides an Audit schedule with Audits planned by the following dates:

- May 2, 2017: *Completed*
- May 2, 2019: *Completed*
- May 2, 2021: *Completed (March 2021)*
- May 2, 2023

Recommendation: The next bi-annual audit is due prior to May 2, 2023, based on the amended schedule shown above. Schedule future SSMP Audits prior to the bi-annual date to ensure compliance with this section utilizing a format that meets the requirements found in Section D. 13 of the SSSWDRs.

11.0 Communication Program [SSSWDR D.13(xi)]

SSSWDR D.13(i) states:

The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.

The Enrollee shall also create a plan of communications with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

Section D.13 (xi): The Cuesta SSMP commits to; communicating with the public, students, and faculty on the development, implementation, and performance of its SSMP and that the communication system will provide the public the opportunity to provide input to the District's program while being developed and prior to implementation. Additional outreach is identified and scheduled for educating the public and satellite systems on proper use of the District sewer systems. The District has implemented this communication plan in the following ways:

- Posting of Cuesta's SSMP District's website:
https://www.cuesta.edu/about/documents/facilities/2018_Cuesta_College_SSMP_Final.pdf
- Development of Annual Reports on Sewer System Performance for the Board of Trustees has not occurred since the last update to the SSMP.
- Additional outreach information regarding acceptable items for discharge to the District sewer system were also developed but not distributed to the public since the last SSMP update.
- Cuesta has identified satellite/tributary systems (facilities) connected to their sewer system in the SSMP. Two minor facilities are considered tributary to the Cuesta sanitary sewer system, The County Office of Education and County of San Luis Obispo General Services. The District is committed to conducting outreach as a proactive measure to communicate with these facilities on standard operation and maintenance procedures for their systems. These outreach efforts have not been conducted since the last update to the District's SSMP.

Sufficiency: Marginal Compliance

Reference: Cuesta SSMP May 2018 Revision 2, Page 58-59, Cuesta website:
https://www.cuesta.edu/about/documents/facilities/2018_Cuesta_College_SSMP_Final.pdf.

Deficiencies: Cuesta did not implement 3 of the 4 commitments identified in the 2018 SSMP.

Recommendation: Implement the plan and schedule identified in the SSMP for the District's Communication Program that involves the Cuesta Council, members of the public and satellite facilities. Keep a record of all outreach efforts and coordination as supporting documentation for this section of the SSMP. Document all communications completed relevant to the SSMP and supporting programs.

Records List by SSMP Section

- 1.0 Goals – See Records under Sections 3 - 11**
- 2.0 Organization**
 - a. SWRCB CIWQS Facility at a Glance Cuesta College: 1/25/21
- 3.0 Legal Authority**
 - a. None
- 4.0 Operation and Maintenance Program**
 - a. Sewer and Storm Water Atlas
 - b. Job Description: Skilled Maintenance – Plumber Levels I & II
 - c. 2017 CCTV Data and 2018 Summary
- 5.0 Design and Performance Standards**
 - a. SLO County Public Works 2011 Public Improvement Standards
- 6.0 Overflow Emergency Response Plan**
 - a. SSO Emergency Response Procedures
- 7.0 Fats, Oils, and Grease Program**
 - a. FOG Interceptor Contractor Pumping Form
- 8.0 System Evaluation and Capacity Assurance Plan (SECAP)**
 - a. None
- 9.0 Monitoring, Measurement, and Program Modifications**
 - a. SWRCB CIWQS Facility at a Glance and Cuesta Operational Report 1/25/21
- 10.0 SSMP Audits**
 - a. SSMP Audit Report – May 2019
- 11.0 Communication Program**
 - a. Cuesta Website: <http://www.cuesta.edu/about/depts/facilities/index.html>
 - b. Appendix H – “Toilets are Not Trashcans” flyer
 - c. SSMP Annual Status Report Template