

City of San Leandro

Sewer System Management Plan (SSMP)

2021-2024 Internal Audit



City of San Leandro
Water Pollution Control Plant
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Created and accepted by:



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System Operator Review

Signature:  Date: 1/30/2025

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Signatures indicating system operators reviewed the audit and provided comments per Specifications 5.4

Introduction

The City of San Leandro must comply with the State Water Resources Control Board (SWRCB) General Reissued Waste Discharge Requirements (WDR) for Sanitary Sewer Systems (“Reissued WDR”, Order No. 2022-0103-DWQ), which became effective on June 5, 2023. The Reissued WDR replaces the 2006 WDR (Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003).

Both the 2006 and the 2023 WDRs required dischargers to create a Sanitary Sewer Management Plan (SSMP). However, the 2023 WDR updates what the SSMP is required to contain. In addition, it requires that the SSMP be audited every three years and contains requirements for the audit.

These requirements are in Specifications 5.4 of the Reissued WDR:

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

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

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

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

The Enrollee shall submit a complete audit report that includes:

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

The City elected to do an internal audit of the SSMP, which will inform an update to the SSMP to be completed later in 2025. This audit reviews historical spill data and compares the current SSMP to the new requirements to address deficiencies relative to the updated requirements.

SSMP Audit Procedures

This audit was prepared by Hayes Morehouse, Water Pollution Control Manager for the City of San Leandro.

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The audit was prepared using these steps:

1. Evaluation of spill data from 2008 through August 2024
2. Detailed comparison of current SSMP with requirements in the Reissued WDR.
3. Interviews with field staff to discuss the SSMP and the preliminary audit findings
4. Incorporation of findings from field staff into the audit document.

The current SSMP may be found on the City's website:

<https://www.sanleandro.org/DocumentCenter/View/5311/SSMP-Volume-I>

Proposed Timeline

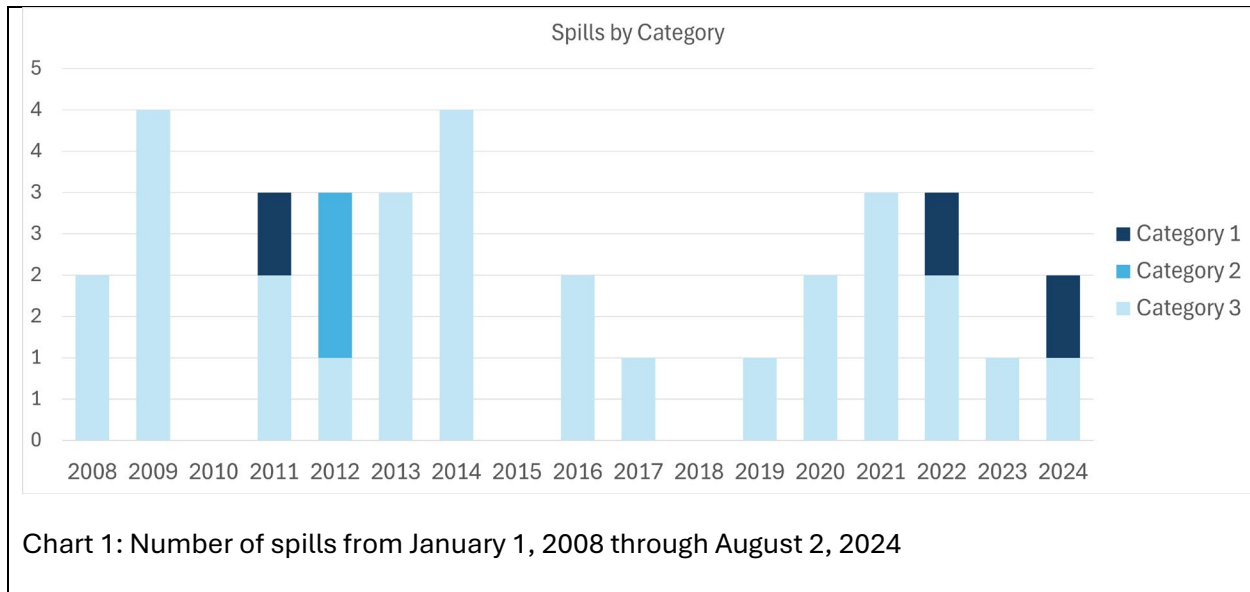
Specifications 5.4 require a proposed timeline for addressing deficiencies identified in the SSMP. The City intends to engage consultants to create an updated SSMP, which will address any deficiencies found by the audit. In the detailed findings below, this is referred to as the updated SSMP and this timeline applies to this update.

There are some findings that should be updated immediately, as noted below. These will be done contemporaneously with the audit.

Activity	Expected Completion
SSMP Audit completed and submitted	February 2, 2025
Edits made to the current SSMP	February 2, 2025
Selection of vendor and contracting	March 1, 2025
Preparation of updated audit	March 1 – June 30, 2025
Presentation of updated SSMP to Council	July 21, 2025

Analysis of Spill History

The first SSMP was created in 2016. For the years from 2008 – 2016, the average number of spills per year was 2.3, while the average for the period from 2017 – 2024 was 1.6. Based on this, the SSMP appears to be working to reduce the number of overflows. The number of Category 1 spills remained low throughout the period. See Chart 1 for more details.



On December 31, 2023 a wet weather event overwhelmed parts of the collection system, resulting in the largest Category 1 spill for the entire period. Interestingly, the spill was not at a location cited by the 2015 Capacity Study. The City is awaiting the results of study the lift stations and other capacity from a developer proposing a new development in the area. This will inform additional studies about what needs to be improved in the area of overflow. The updated SSMP will reflect this effort.

Excluding the major wet weather event, the SSMP appears to be effective in preventing spills. The average gallons spilled per year from 2008 – 2016 was 1260 while from 2017 – 2024 was 321. See Chart 2 for more details.

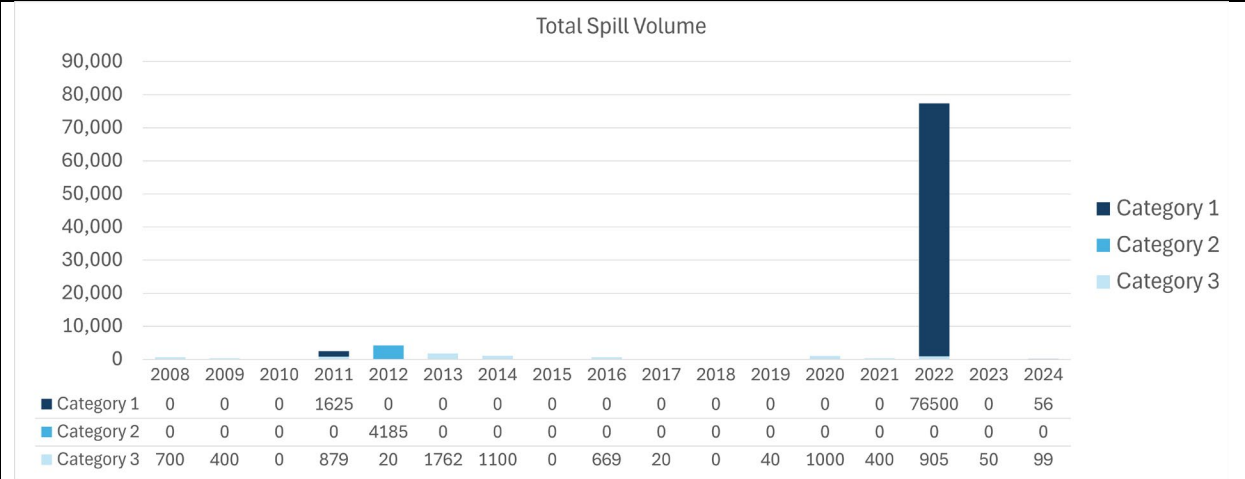


Chart 2: Total gallons spilled from January 1, 2008 through August 2, 2024

San Leandro is generally successful at preventing spills from reaching surface waters. Except for the 2022 wet weather event, Category 1 spills have been rare and it is not possible to determine the SSMP effectiveness based on this metric.

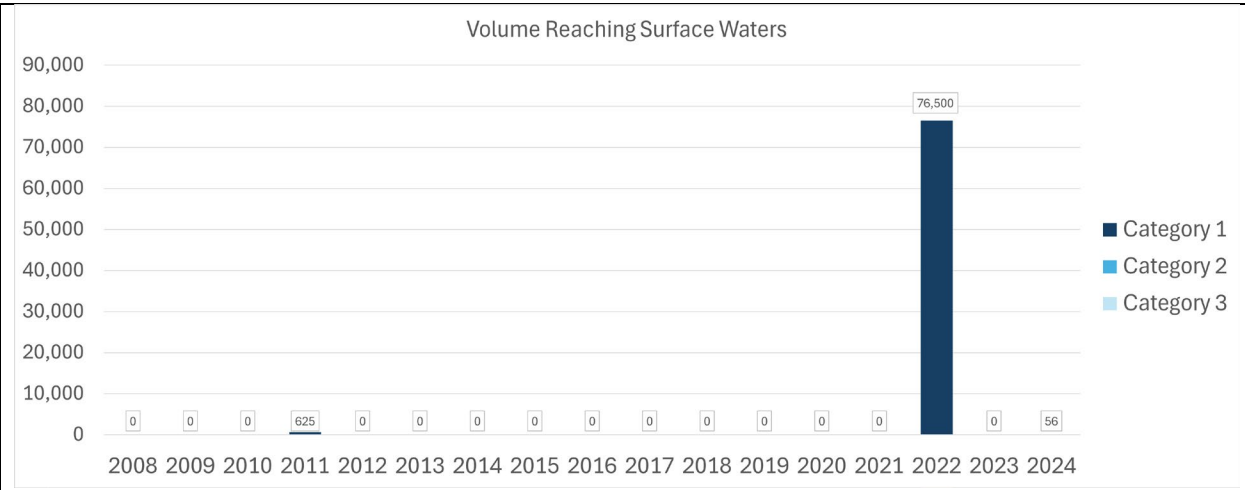


Chart 3: Gallons reaching surface waters from January 1, 2008 through August 2, 2024

Detailed Review of SSMP Compliance

The following is a comparison of the current San Leandro SSMP with the requirements of the Reissued WDR.

Section 1: Sewer System Management Plan and Introduction

Requirements per Attachment D:

1. SEWER SYSTEM MANAGEMENT PLAN GOAL AND INTRODUCTION

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

The Plan must include a narrative Introduction section that discusses the following items:

1.1. Regulatory Context

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

1.2. Sewer System Management Plan Update Schedule

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

1.3. Sewer System Asset Overview

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

- Location, including county(ies);
- Service area boundary;
- Population and community served;
- System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons;
- Structures diverting stormwater to the sewer system;
- Data management systems;
- Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals;
- Estimated number or percent of residential, commercial, and industrial service connections; and
- Unique service boundary conditions and challenge(s).

Additionally, the Plan Introduction section must provide reference to the Enrollee's up- to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment.

Audit Findings and Corrective Actions:

- Section 1.1: The Background section contains some regulatory background information. However, it needs to be updated for the Reissued WDR requirements. Narrative should be improved in SSMP update.
- Section 1.2: The required update schedule for the SSMP is not included. It should be included in the updated SSMP.
- Section 1.3:

The following should be updated in the SSMP:

- Updated population
- Estimate of population served

The following are not included in the current SSMP and should be included in the update:

- Map of service area
- Miles of force mains and siphons
- Data management systems
- Sewer System ownership
- Estimated number of service connections
- Unique boundary conditions and challenges

Section 2: Organization

Requirements per Attachment D:

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

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

Audit Findings and Corrective Actions:

- The name of the Water Pollution Control Manager is out of date. This will be fixed in an interim update to the current SSMP and in the updated SSMP.
- Position contact information is included but doesn't include email addresses. This will be fixed in an interim update to in the updated SSMP.
- The chain of communication in narrative format. This should also be represented graphically. This will be included in the SSMP Update
- A chart from the OERP is included. This will be updated to the latest version in the SSMP update.

Section 3: Legal Authority

Requirements per Attachment D:

The Plan must include copies or an electronic link to the Enrollee's current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority to:

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

Audit Findings and Corrective Actions:

The SSMP lists the codes and City Ordinances that provide authority to regulate the sewer system and delineate responsibility. It states the section number but should also include a link to the relevant code. This will be included in the updated SSMP.

The City's ordinances will be compared to best practices during the upcoming SSMP update. If deficiencies are found, staff will identify the necessary changes and take these to Council.

Section 4: Operation and Maintenance Program

Requirements per Attachment D:

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

4.1. Updated Map of Sanitary Sewer System

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

4.2. Preventive Operation and Maintenance Activities

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

The scheduling system must include:

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

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

4.3. Training

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

- The requirements of this General Order;
- The Enrollee's Spill Emergency Response Plan procedures and practice drills;
- Skilled estimation of spill volume for field operators; and
- Electronic CIWQS reporting procedures for staff submitting data.

4.4. Equipment Inventory

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

Audit Findings and Corrective Actions:

- The SSMP includes an image of a map from the City's CMMS system, but it does not include the required level of detail. The updated SSMP will include additional maps with the required details.
- The SSMP contains an accurate and current description of the City's system for managing work orders and tracking maintenance of the system. The City is planning an upgrade of the sewer CMMS application. This change will also require some changes to the maintenance program. A description of the upgraded system will be included in the SSMP update.
- A description of the training program is included. Additional trainings have been added to comply with the spill requirements for the Reissued WDR. These additional trainings will be included in the updated SSMP.
- An equipment inventory is included, but should also include information about replacement and spare parts. This will be added in the updated SSMP.

Section 5: Design and Performance Provisions

Requirements per Attachment D:

The Plan must include the following items as appropriate and applicable to the Enrollee's system:

5.1. Updated Design Criteria and Construction Standards and Specifications

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

5.2. Procedures and Standards

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

Audit Findings and Corrective Actions:

Section 5 of the SSMP references Appendix B, which includes standard plans for sanitary sewer connections, manholes, and sewer crossings. It does not include standards for pipelines or pump stations. If available, these will be added to the updated SSMP. If they are not available, the SSMP will include a schedule for developing them and including them later.

Section 5 also includes a description of who inspects the sewers but does not include procedures or standards for how they are inspected. Greater detail will be included in the SSMP update.

Section 6: Spill Emergency Response Plan

Requirements per Attachment D:

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

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

Audit Findings and Corrective Actions:

The current SSMP contains an Overflow Emergency Response Plan. In accordance with the Reissued WDR, the City created an updated Spill Emergency Response Plan (SERP), completed in July 2023, that is designed to meet these requirements.

The current SSMP will be modified to include reference to the updated plan and the new plan will be included in the SSMP update.

Section 7: Sewer Pipe Blockage Control Program

Requirements per Attachment D:

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

The procedures must include, at minimum:

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

Audit Findings and Corrective Actions:

The SSMP includes a description of the Fats Oils and Grease (FOG) program and the source control requirements to prohibit discharges to the sewer system. It also includes references to the City's Uniform Wastewater Discharge Regulations that require grease interceptors.

The updated SSMP will contain the following that is currently missing:

- Description of the public education and outreach program.
- A plan for disposal of pipe blocking substances.
- Additional details and links to the relevant ordinances that prohibit
- A map or other identification of areas that are prone to FOG blockages
- Additional details about the FOG inspection program

Section 8: System Evaluation, Capacity Assurance and Capital Improvements

Requirements per Attachment D:

The Plan must include procedures and activities for:

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

8.1 System Evaluation and Condition Assessment

The Plan must include procedures to:

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

8.2. Capacity Assessment and Design Criteria

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

- Dry-weather peak flow conditions that cause or contributes to spill events;

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

The capacity assessment must consider:

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

8.3. Prioritization of Corrective Action

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

8.4. Capital Improvement Plan

The capital improvement plan must include the following items:

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

Audit Findings and Corrective Actions:

The current SSMP contains a description of the Sanitary Sewer Capacity Study and Master Plan (“Capacity Study”) that was completed in 2015. It also contains a description of the CIP funding currently budgeted for point repairs.

Section 8.1:

- The Capacity Study used sophisticated modeling techniques to identify areas that may be prone to capacity problems. It also used flow monitors to verify flow in parts of the collection system.
- The percentage of the system to be assessed is not identified or justified. This will be included in the updated SSMP.
- Neither the Capacity Study nor the current SSMP prioritize assessments based on environmental sensitivity. This will be included in the updated SSMP.
- The video surveillance program is described in section 4. This will be included in Section 8 in the updated SSMP, along with a description of how priorities are set.
- Procedures for utilizing observations in the condition assessment will be included in the updated SSMP.
- Document retention and recordkeeping procedures are not included in the current Section 8. These will be included in the updated SSMP.
- Impact of climate change are not evaluated in the current SSMP. An identification of vulnerable assets will be included in the updated SSMP.

Section 8.2:

- Spill data from the past several years do not indicate that dry weather capacity is a major contributor to spill events. Procedures for analyzing this will be included in the updated SSMP.
- A description of the procedures for identifying wet weather capacity problems will be included in the updated SSMP.
- Capacity of key system components is included in the Capacity Study. A summary of this will be included in the updated SSMP.
- Spill data do not indicate individual sources contributing to sewer spills, with the exception of inflow/infiltration. An assessment or assessment procedures will be included with the updated SSMP.
- The Capacity Study includes a study of expected wet weather flows. It does not include an assessment of how climate change may affect storm intensity. These will be included in the updated SSMP.

Section 8.3:

The Capacity Study identifies areas that may need capacity increases. However, it did not prioritize these based on the consequences of potential spills. Procedures for adding this will be included in the updated SSMP.

Section 8.4:

The Capital Improvement Plan included in the current SSMP includes a general description of the sewer capital investment program. However, it does not include the detail required by the Reissued WDR. Procedures for developing this plan will be included in the updated SSMP.

Section 9: Monitoring, Measuring and Program Modifications

Requirements per Attachment D:

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

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

Audit Findings and Corrective Actions:

The current SSMP describes the procedures used to track effectiveness of the SSMP program. It is not organized by Plan Element as required by the Reissued WDR. This will be included in the updated SSMP. While it does include a description of how effectiveness is tracked using CMMS software, it does not include a process for updating the SSMP procedures and activities based on real-world data.

It includes spill trends, frequency and volume, but does not include information about how location should be tracked or how that should inform the program. This will be included in the updated SSMP.

Section 10: Internal Audits

Requirements per Attachment D:

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

Audit Findings and Corrective Actions:

The audit schedule has changed in the Reissued WDR. In the updated SSMP, this will be updated to include the required 3-year audit schedule and an annual review schedule. The current SSMP refers to an audit checklist. This will be updated to include procedures to conduct a more thorough assessment of the SSMP and how it meets current regulations and how it guides the collection system maintenance program.

Section 11: Communication Program

Requirements per Attachment D:

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

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

Audit Findings and Corrective Actions:

The current SSMP describes the outreach program but does not include information about how the public will be notified of closures of public areas or how the public input will be gathered during the SSMP development, implementation and update process. These elements will be included in the updated SSMP. It also does not include information for owners or operators of other systems. These will be included, as necessary, in the updated SSMP.

Conclusion

While the City's current SSMP met the requirements of the 2006 WDR, it needs to be updated to meet the requirements of the Reissued 2022 WDR. The City has a plan in place to meet this requirement and presents the timeline above. The City continues to use the SSMP to prevent sewer spills and limit their impact when they occur.