

**City of Alhambra**

**Sanitary Sewer Collection System Compliance Evaluation Re-Inspection**

**Alhambra, Los Angeles County**

**Place ID #631880**

**Waste Discharge ID #4SSO10362**

**Inspection Date:** December 10, 2012

**Inspection Report Prepared By:** Julie Berrey, State Water Board, Office of Enforcement

**Date of Report:** December 24, 2012

**Attachments:**

Attachment A – Summary of the City’s Sanitary Sewer Overflows (SSOs)

Attachment B – Summary of SSOs with Certification and Notification Violations

Attachment C – SSO #764631 March 21, 2011 Documentation

Attachment D – SSO #772308 October 20, 2011 Documentation

Attachment E – City of Alhambra March 2009 Sewer System Rehabilitation Plan (Excerpts)

Attachment F – City of Alhambra June 2007 Sewer Master Plan (Excerpts)

Attachment G – City of Alhambra April 2009 Sanitary Sewer Management Plan (Excerpt)

Attachment H – City of Alhambra March 3, 2012 Collection System Questionnaire

## 1. PURPOSE OF THE INSPECTION

The purpose of this re-inspection was to evaluate the City of Alhambra's (hereafter, City's) compliance with the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, State Water Resources Control Board Order No. 2006-0003-DWQ (hereafter, Sanitary Sewer Order), including the required CIWQS<sup>1</sup> reporting, sewer system management plan (SSMP) requirements, and amended Monitoring and Reporting Program (hereafter, Amended MRP) requirements, contained in Order No. 2008-0002-EXEC.

The City had been previously inspected on December 20, 2011, approximately one year earlier, which resulted in a Notice of Violation (NOV) dated June 18, 2012<sup>2</sup>. The City responded to the NOV on June 27, 2012<sup>3</sup>, stating in what ways it had improved its program as a result of the inspection. This re-inspection was primarily focused on the City's NOV response and a review of all previously identified violations, areas of concern, and recommendations identified during the December 20, 2011 inspection.

The re-inspection consisted of interviews with City staff and management, a discussion of the City's collection system program, and a review of some of the City's sewer system records. The re-inspection included a partial review of the City's 2009 SSMP with a focus on capacity and capital improvement schedules and funding. Time did not allow for a field inspection to evaluate the City's operations, maintenance, and management of its sewer assets. Staff present at the re-inspection included:

Julie Berrey	State Water Resources Control Board
Chris Lopez	Los Angeles Regional Water Quality Control Board
Jim Fischer	State Water Resources Control Board
David Dolphin	City of Alhambra
Martin Ray	City of Alhambra
Claudine Meeker	City of Alhambra
Ron Capotosto	City of Alhambra
Norman Kleinau	City of Alhambra

## 2. COLLECTION SYSTEM DESCRIPTION

As described in the City's March 7, 2012 annual Questionnaire<sup>4</sup> (Attachment H), the City sanitary sewer collection system (hereafter, collection system) serves approximately 83,000 people. The collection system is composed of 130 miles of gravity flow pipelines and 1.3 miles of pressure force mains. Additionally, the City's SSMP states that the City operates and maintains manholes and 7 pump stations. The City currently has approximately 16,400 sewer connections.

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<sup>1</sup> California Integrated Water Quality System (CIWQS) online database, available at:

[https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso\\_main](https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main)

<sup>2</sup> June 18, 2012 Notice of Violation available at [http://www.waterboards.ca.gov/water\\_issues/programs/sso/](http://www.waterboards.ca.gov/water_issues/programs/sso/)

<sup>3</sup> June 27, 2012 City of Alhambra Response to NOV available at [http://www.waterboards.ca.gov/water\\_issues/programs/sso/](http://www.waterboards.ca.gov/water_issues/programs/sso/)

<sup>4</sup> Pursuant to the Amended MRP, all enrollees must complete the "Collection System Questionnaire" in CIWQS at least every 12 months.

### 3. FINDINGS

The following findings in Tables 1 and 2 are inclusive of the onsite re-inspection and post-inspection review process.

TABLE 1: VIOLATIONS		
FINDING	APPLICABLE REQUIREMENT	SUPPORTING EVIDENCE
<b>SSO DISCHARGES</b>		
<p>1) <i>Based on the review of CIWQS<sup>5</sup> data between 1/2/07 and 12/10/12, the City certified 18 Sanitary Sewer Overflows (SSOs) of which 13 (or 72 percent) were <u>Category 1<sup>6</sup> SSOs</u>, illegally discharged to surface waters.</i> REPEAT VIOLATION</p>	<p>Prohibition C.1 of Sanitary Sewer Order (see page 7)</p>	<p>All of the Category 1 SSOs that discharged to waters of the United States are in violation of Prohibition C.1 of the Sanitary Sewer Order. (See Attachment A.)</p>
<p>2) <i>Between 1/2/07 and 12/10/12, the City illegally discharged at least 1 additional <u>Category 1 SSO</u> that reached surface waters. (This SSO was not reported to CIWQS at the time of the re-inspection.)</i></p>	<p>Prohibition C.1 of Sanitary Sewer Order (see page 7)</p>	<p>On August 22, 2012, the City discovered that the sewer lateral from a City-owned recreational pool facility was plumbed directly into the storm drain rather than to the sewer collection system. Martin Ray estimated that the pool facility had been built in 1991. The City illicitly discharged bathroom facility wastewater and pool filter backwash to surface waters.</p>

<sup>5</sup> California Integrated Water Quality System (CIWQS), hosted by the State Water Board. (See [www.waterboards.ca.gov/ciwqs](http://www.waterboards.ca.gov/ciwqs).) The City was first required to report SSOs to CIWQS beginning January 2, 2007.

<sup>6</sup> Pursuant to the Amended MRP, Category 1 SSO includes all discharges of sewage resulting from a failure in the Enrollee's sanitary sewer that (a) equal or exceed 1000 gallons; (b) result in a discharge to a drainage channel and/or surface water; or (c) discharge to a storm drainpipe that was not fully captured and returned to the sanitary sewer system. Category 2 SSOs are defined as all other SSOs that do not meet the definition of a Category 1 SSO.

**TABLE 1: VIOLATIONS (contd.)**

FINDING	APPLICABLE REQUIREMENT	SUPPORTING EVIDENCE
<b>SSO NOTIFICATION, REPORTING AND DOCUMENTATION</b>		
<p>3) <i>Between 1/2/07 and 12/10/12, the City failed to report all known SSOs to CIWQS.</i></p> <p>REPEAT VIOLATION</p>	<p>Provision A.4 of Amended MRP (see page 2)</p>	<p>The City is required to report to CIWQS all SSOs that occur as a result of flow conditions in any City-owned portion of the collection system, including SSOs from City-owned laterals. The City was verbally reminded of this during its previous inspection, on December 20, 2011, and was cited in the resulting notice of violation (NOV) dated June 18, 2012. During the December 10, 2012 re-inspection, inspection staff again found evidence of unreported SSOs:</p> <ol style="list-style-type: none"> <li>1) <u>Unreported SSO #1</u>: On August 22, 2012, the City discovered that it had illicitly discharged bathroom facility wastewater and pool filter backwash from a City-owned pool facility to surface waters. (See Violation #2, above.) The City failed to report this SSO to CIWQS.</li> <li>2) <u>Unreported SSO #2<sup>7</sup></u>: On April 4, 2011, accumulation of fats, oil, and grease (FOG) in the City’s collection system resulted in an SSO at 200 West Main Street. Most of the discharge was contained in the basement of the building, with some flow in a parking lot and alley next to the building. The City failed to report this SSO to CIWQS, despite already being notified of the violation during the December 20, 2011 inspection and in the resulting June 18, 2012 NOV to the City.</li> </ol>
<p>4) <i>The City failed to accurately report Category 1 SSO volumes to CIWQS.</i></p> <p>REPEAT VIOLATION</p>	<p>Provision A.11 of Amended MRP (see page 4)</p>	<p>SSO #772308: In a multiple-day SSO event occurring in October 2011, the City certified that an estimated 138,000 gallons of wastewater spilled, that 138,000 gallons of wastewater were recovered, and that 97,000 gallons of wastewater reached a drainage channel. It was clear from discussions with Martin Ray, Claudine Meeker, and David Dolphin during the re-inspection that the City did not know how it calculated any of these volumes, and that the City could not have recovered all the SSO volume that was discharged. Claudine Meeker also stated that the SSO volumes reported to CIWQS included not only the volume of wastewater that was recovered, but erroneously included “ambient” water that was already flowing in the drainage channel that was removed while attempting to recover the spilled wastewater. (See Attachment D.)</p> <p>The City failed to correct the reported SSO volume information in CIWQS, despite already being notified of the violation in the June 18, 2012 notice of violation (NOV) to the City.</p>

<sup>7</sup> This SSO, SSO #788941 was subsequently reported to CIWQS on Dec. 11, 2012.

**TABLE 1: VIOLATIONS (contd.)**

FINDING	APPLICABLE REQUIREMENT	SUPPORTING EVIDENCE
<b>SSO NOTIFICATION, REPORTING and DOCUMENTATION (contd.)</b>		
5) <i>Between 1/2/07 and 12/10/12, the City failed to timely certify 5 out of at least 20 known Category 1 SSOs (25 percent noncompliance rate).</i>	Provision A.4 of Amended MRP (see page 2)	The City is required to complete and certify Category 1 SSO reports in CIWQS within 15 calendar days of the conclusion of SSO response and remediation. The City failed to timely certify 3 SSOs that were reported to CIWQS and at least 2 other SSOs that had not yet been reported to CIWQS at the time of the re-inspection. (See Violation #3 above.) A list of the SSOs in which the City did not meet the required timeframes is included in Attachment B.
6) <i>The City failed to comply with the required 2-hour notification for at least 4 out of 13 known SSOs where sewage reportedly reached a drainage channel or surface water (31 percent noncompliance rate).</i>	Notification Provision 1 of Amended MRP (see page 1)	Since February 20, 2008, when the Amended MRP became effective, the City failed to timely notify all three required agencies [State Office of Emergency Services (California Emergency Management Agency after October 1, 2008), the local health officer, and the Regional Water Board] within two hours of becoming aware of an SSO reaching a drainage channel or surface water. A list of the SSOs in which the City failed to provide timely 2-hour notification to the appropriate agencies is included in Attachment B.
7) <i>The City failed to retain and maintain adequate SSO records and documentation.</i>  REPEAT VIOLATION	Provision B of Amended MRP (see page 5)	<p>1) <u>SSO Records</u>: During the December 10, 2012 re-inspection, inspectors asked City staff to explain how SSO discharge volumes were calculated for the City's two most recent certified SSOs: SSO event #764631 that occurred on March 21, 2011; and SSO event #772308 that occurred in October 2011. Despite reviewing all available written documentation and interviewing all available City collections staff (Martin Ray, Claudine Meeker, David Dolphin, Ron Capotosto, and Norman Kleinau), the City lacked the necessary documentation to determine exactly who had responded to those SSOs or how the reported spill discharge and recovery volumes had been calculated. (See Attachments C and D.)</p> <p>2) <u>After-Hours Sewer Calls Records</u>: Despite being told during the December 20, 2011 inspection and the resulting June 18, 2012 NOV to improve after-hours documentation of sewer-related calls, at the December 10, 2012 re-inspection, the City was still unable to produce proper documentation of SSO complaints received after normal business hours. The City has limited ability to control the Fire Department's record-keeping, as the contract for Fire Department response is administered by the County of Los Angeles. However, the City does have control over its Police Department and the City failed to require adequate documentation of after-hours calls taken by its 911 dispatch and Police Department.</p>

**TABLE 1: VIOLATIONS (contd.)**

FINDING	APPLICABLE REQUIREMENT	SUPPORTING EVIDENCE
<b>OPERATION AND MAINTENANCE</b>		
8) <i>The City failed to implement its approved Sanitary Sewer Management Plan (SSMP).</i>	Provision D.11 of Sanitary Sewer Order (see page 9)	<p>1) <u>CCTV Program</u>: In 2007 – 2008, the City contracted to have its entire system visually inspected using closed circuit television (CCTV) as part of the development of a sewer rehabilitation plan. The City’s March 2009 Sewer System Rehabilitation Plan recommends that follow up CCTV inspection and condition assessment will be conducted annually on portions of the system rated to be in severe structural deficiency, every 3 years on the portions of the system rated to be in major structural deficiency, every 4 years on the portions of the system with operational and maintenance deficiencies, and that the entire system should be inspected with CCTV equipment at least every 10 years. (See Attachment E, page 25 of the City’s Sewer System Rehabilitation Plan.)</p> <p>The City purchased CCTV equipment in 2012, but Martin Ray stated during the re-inspection that the City does not routinely use the CCTV equipment because of a lack of field crews to operate it. He told the inspection team that the City has no regular CCTV program to assess its sewer assets, and that they have not inspected their sewer system using CCTV in accordance with their own Sewer System Rehabilitation Plan. Their only inspection “program” using CCTV is to visually inspect sewer lines using CCTV equipment after SSOs. Otherwise, the CCTV equipment is used by “special request.”</p> <p>Martin Ray also stated during the re-inspection that the City intends to have the recommended 10-year CCTV inspection of the entire sewer system conducted by an outside contractor; but this is still years into the future with no definite mechanism in place.</p>

**TABLE 1: VIOLATIONS (contd.)**

FINDING	APPLICABLE REQUIREMENT	SUPPORTING EVIDENCE
<b>OPERATION AND MAINTENANCE</b>		
<p>8) <i>Cont.:</i>  <i>The City failed to implement its approved Sanitary Sewer Management Plan (SSMP).</i></p> <p>REPEAT VIOLATION</p>	<p>Provision D.11 of Sanitary Sewer Order (see page 9)</p>	<p>2) <u>Implementation of Capital Improvements</u>: According to the City’s March 7, 2012 responses to the annual Questionnaire<sup>8</sup>, 95% of the City’s gravity lines are over 50 years old. (See Attachment H, Questionnaire.) The City’s 2009 Rehabilitation Plan rated defects in 66 pipe reaches as “severe” and 117 reaches as “major.” (See page 16, Attachment E, Sewer System Rehabilitation Plan.) The City’s Sewer Master Plan lays out a 10-year schedule to improve its gravity system. (See pages 8-4 through 8-6, Attachment F, Sewer Master Plan.)</p> <p>The City’s Sewer System Rehabilitation Plan recommends that manholes be repaired or replaced over a 5+ year period. (See pages 26 – 28, Attachment E, Sewer System Rehabilitation Plan.)</p> <p>Despite these schedules in the City’s SSMP for implementing some capital improvements to the gravity portion of the collection system, Martin Ray and Claudine Meeker were unaware of a CIP schedule and Claudine Meeker said during the re-inspection that the City, “gets to them [capital improvements] as we can,” and that she and Martin Ray “throw spaghetti on the wall [proposed projects] and see what sticks.”</p>
<p>9) <i>The City failed to provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events.</i></p> <p>REPEAT VIOLATION</p>	<p>Provision D.7 of the Sanitary Sewer Order (see page 9)</p>	<p>The City’s Sewer Master Plan includes a flow monitoring study conducted in 2004 – 2005. Of the 7 locations where flow monitors were installed, the study showed that peak wet weather flows exceeded the recommended ratio at 6 of the 7 flow monitoring sites, and that dry weather flows exceeded the recommended ratio at 3 of the 7 flow monitoring sites. (See page 4-6, Attachment F, Sewer Master Plan.)</p> <p>Based on the City’s hydraulic model, the study identified 43,152 feet of hydraulically deficient pipe (or 6.4% of the total sewer system length). (See page 1-5, Attachment F, Sewer Master Plan.)</p> <p>Martin Ray and Claudine Meeker stated that they did not have a program in place to reduce inflow and infiltration or to increase capacity. Any capacity improvements are incidental results of repairs or upgrades performed for other reasons.</p>

<sup>8</sup> Pursuant to the Amended MRP, all enrollees must update the “Collection System Questionnaire” at least every 12 months. This questionnaire is updated in CIWQS.

**TABLE 1: VIOLATIONS (contd.)**

FINDING	APPLICABLE REQUIREMENT	SUPPORTING EVIDENCE
<b>SEWER SYSTEM MANAGEMENT PLAN (SSMP)</b>		
<p>10) <i>The City's Sanitary Sewer Management Plan (SSMP) fails to provide time schedules for implementing short- and long-term capital improvements.</i></p>	<p>Provisions D.13(iv)(c) and D.13(viii)(d) of Sanitary Sewer Order (see pages 11 and 14)</p>	<p>The City's SSMP fails to provide the necessary short-term or long-term time schedules to address all necessary capital improvement projects:</p> <ol style="list-style-type: none"><li>1) <u>Gravity System Capital Improvements Schedule</u>: The City's Sewer Master Plan includes a schedule for addressing the most critical gravity system capital improvement projects within a 10-year timeframe, indicated by "Year 1," "Year 2," etc. This schedule is inadequate as it does not indicate in what particular calendar or fiscal year(s) each improvement project will be undertaken. (See pages 8-4 through 8-6, Attachment F, Sewer Master Plan.)</li><li>2) <u>Manhole Capital Improvements Schedule</u>: The City's Sewer System Rehabilitation Plan recommends that manholes be repaired or replaced over a 5+ year period. This schedule is inadequate as it does not indicate in what specific calendar or fiscal year(s) each improvement project will be undertaken. (See pages 26 – 28, Attachment E, Sewer System Rehabilitation Plan.)</li><li>3) <u>Pump Station Capital Improvements Schedule</u>: The City has no specific schedule to implement the recommended capital improvements to the City's sewer pump stations. All of the City's pump stations are at least 60 years old. The City's Sewer Master Plan recommends replacing several pump stations (Story Park, #2, and #3) and recommends the replacement of the force mains associated with pump stations #4, #7, and #8. The City is in the final design stage for replacement and relocation of pump station #3 and has added an emergency generator at pump station #4, but does not appear to have a schedule for addressing all the other recommended pump station capital improvements. (See pages 1-10 and 8-6, Attachment F, Sewer Master Plan.)</li><li>4) <u>Capacity Assurance Schedule</u>: As described in Violation #9 above, the City has identifiable capacity issues, but has not developed a specific schedule to address the improvements necessary to provide adequate flow capacity.</li></ol>



**TABLE 1: VIOLATIONS (contd.)**

FINDING	APPLICABLE REQUIREMENT	SUPPORTING EVIDENCE
<b>SEWER SYSTEM MANAGEMENT PLAN (SSMP)</b>		
<p>11) <i>The City's Sanitary Sewer Management Plan (SSMP) fails to include a time <u>schedule</u> for developing the <u>funds</u> needed for its capital improvement plan</i></p>	<p>D.13(iv)(c) of Sanitary Sewer Order (see page 11)</p>	<p>A funding schedule shall coincide with the capital improvement schedule to ensure that there are adequate funds allocated.</p> <p>In October of 2012, the last year of the City's five-year sewer rate increase went into effect. (See Section VI, Attachment G, SSMP.) During the re-inspection, Martin Ray and Claudine Meeker made it clear that the current sewer rates will not suffice to timely implement all of the capital improvements necessary to properly operate and maintain its collection system (as identified in the City's SSMP, Sewer Master Plan, and Sewer System Rehabilitation Plan).</p> <p>In its SSMP, the City does not lay out a schedule for developing the funds necessary to implement all necessary capital improvements, and Martin Ray and Claudine Meeker told the inspection team that they have not yet begun the analysis of what additional sewer rate increase(s) will be necessary to properly operate its sewer program.</p>
<p>12) <i>The City's Sanitary Sewer Management Plan (SSMP) failed to identify <u>sources of funding</u> for addressing hydraulic deficiencies and ensuring adequate flow capacity</i></p>	<p>D.13(viii)(c) of Sanitary Sewer Order (see page 14)</p>	<p>In October of 2012, the last year of a five-year sewer rate increase went into effect. Martin Ray and Claudine Meeker made it clear that the current sewer rates will not suffice to timely implement all of the improvements needed to ensure adequate sewer capacity and that it has not yet identified sources of funding for those improvements.</p>
<p>13) <i>The City failed to conduct an adequate Sanitary Sewer Management Plan (SSMP) 2-year Audit.</i></p>	<p>D.13(x) of Sanitary Sewer Order (see page 14)</p>	<p>The City's 2-year internal audit of its SSMP was extremely cursory and fails to evaluate the effectiveness of the SSMP or to identify deficiencies in its SSMP and steps to correct those deficiencies. Although this violation was discussed during the Dec. 20, 2011 inspection, the City's understanding was that the audit did not need to be redone immediately, but could wait until the 2-year cycle requires a new internal audit to be completed. While this continues to be an outstanding violation, because of the specific circumstances regarding this misunderstanding, the inspection team instructed the City that it can wait until its next 2-year SSMP audit cycle (2013) to resolve this violation.</p>

**TABLE 2: AREA OF CONCERN<sup>9</sup>**

FINDING	APPLICABLE REQUIREMENT	NOTES
1) <i>The City may have failed to report all SSOs to CIWQS</i>	Provisions A.4 and A.5 of Amended MRP (see page 2)	<p>In each of the two collection system inspections conducted at the City, investigators found unreported SSOs. Because the investigators reviewed only a small portion of the City's records in each of these inspections, there may be additional SSOs that the City has not reported to CIWQS.</p> <p>Recommendation: Review all collection system records to ensure all SSOs have been reported to CIWQS. If any additional SSOs are reported to CIWQS, maintain all available documentation to substantiate the data in the report.</p>
2) <i>Between 1/2/07 and 12/10/12, the City illegally discharged at least 1 additional SSO that may have created a nuisance. (This SSO was not reported to CIWQS at the time of the re-inspection.)</i>	Prohibition C.2 of Sanitary Sewer Order (see page 7)	As explained in Violation #3 above, on April 4, 2011, accumulation of fats, oil, and grease (FOG) in the City's collection system resulted in an SSO at 200 West Main Street. Most of the discharge was contained the basement of the building, potentially creating a nuisance, with some wastewater flowing in a parking lot and alley next to the building.
3) <i>The City may have misreported some additional SSO volumes in CIWQS.</i>	Provisions A.9 and A.11 of Amended MRP (see pages 3 and 4)	<p>SSO volumes may not have been properly calculated and reported to CIWQS.</p> <p>Based on available documentation and interviews of City staff (Martin Ray, Claudine Meeker, David Dolphin, Ron Capotosto, and Norman Kleinau), the City was unable to explain how discharge and recovery volumes that were reported to CIWQS had been calculated for two of their SSOs. (See Violation #7 above.)</p> <p>Additionally, for all reported SSOs, the SSO start time and SSO discovery time are to be the same time. It is highly unlikely that all SSOs always began at the moment of discovery. Since volume calculations are often based on flow rate, an inaccurate start time will result in inaccurate volume estimates.</p> <p>Recommendation: Review all SSOs to understand how the SSO volumes were calculated. Confirm that the most accurate data available were used to calculate volumes. If any discrepancies or errors are found, immediately update those SSO reports in CIWQS, and maintain all available documentation to substantiate the changes to the reported data.</p>

<sup>9</sup> Areas of Concern are issues that could lead to a violation if not properly addressed

**TABLE 2: AREA OF CONCERN (contd.)**

<b>FINDING</b>	<b>APPLICABLE REQUIREMENT</b>	<b>NOTES</b>
4) <i>The City may have failed to comply with the required notifications for at least 2 SSOs that had not yet been entered in CIWQS at the time of the December 10, 2012 re-inspection.</i>	Notification Provisions 1 and 2 of Amended MRP (see page 1)	<p>It is unclear if the City timely notified all three required agencies of the two SSOs that the City failed to report to CIWQS. (See Violation #3, above.)</p> <p>Recommendation: The City should determine if it made the appropriate notifications for any unreported SSOs and update CIWQS as necessary. If any changes are made in CIWQS, maintain all available documentation to substantiate the changes to reported data.</p>
5) <i>The City's Sanitary Sewer Management Plan (SSMP) may not have been approved by its governing Board.</i>	D.14 of Sanitary Sewer Order (see page 15)	<p>The City failed to provide evidence of governing board approval of its SSMP. Claudine Meeker stated that the City's SSMP was approved by a resolution of its City Council. A signed copy of this resolution was not included in documentation provided prior to the December 20, 2011 inspection.</p> <p>Recommendation: The City should provide a signed copy of the resolution.</p>
6) <i>The City does not appear to have an adequate system for scheduling regular preventive maintenance</i>	D.13(iv)(b) and D.13(ix) of Sanitary Sewer Order (see pages 11 and 14, respectively)	<p>During the December 20, 2011 inspection, City staff said that the City had no computerized sewer maintenance management system that was capable of generating work orders for scheduling routine maintenance, tracking planned or completed maintenance, facilitating or adjusting the maintenance frequency, or generating work orders following SSOs. The City was using the "Springbook" billing software to track work orders. The resulting June 18, 2012 NOV states that this is a deficiency and recommends that the City adopt a computerized maintenance management system (CMMS) to efficiently allow the City to integrate, map, and track maintenance, SSOs, inspection history and condition assessment of its pipes.</p> <p>On Dec. 10, 2012, Claudine Meeker stated that the City has not yet purchased CMMS and that they are looking into an upgrade of their Springbook software.</p> <p>Recommendation: The Springbook software appears to be billing software that may not easily adapt to the needs of sewer maintenance. The City should consider whether the Springbook software will meet their needs prior to investing in it.</p>

**TABLE 2: AREA OF CONCERN (contd.)**

FINDING	APPLICABLE REQUIREMENT	NOTES
<p>7) <i>The City's existing Fats, Oils, and Grease (FOG) reduction program could be improved</i></p>	<p>D.13(vii) of Sanitary Sewer Order (see page 13)</p>	<p>Since the December 20, 2011 inspection, the City has hired an additional FOG inspector and has begun compliance inspections of commercial FOG generators, and has even begun some enforcement action. The City is also in the process of updating its FOG ordinances. However, the City still experiences substantial FOG at its pump stations and must use enzyme additives to keep FOG under control.</p> <p>Recommendation: Since FOG is best dealt with at the source, the City should continue to enhance and improve both its residential and commercial FOG reduction programs. As a reminder, the City should review its FOG activities to ensure compliance with all elements of D.13(vii) of the Sanitary Sewer Order.</p>
<p>8) <i>The City does not appear to have an adequate Sanitary Sewer Management Plan (SSMP) communication program</i></p>	<p>D.13(xi) of Sanitary Sewer Order (see page 15)</p>	<p>The City's Communication Program may be inadequate:</p> <ol style="list-style-type: none"> <li>1) <u>Public Communication Program</u>: The City does not appear to be communicating on a regular basis with the public about its SSMP, including SSMP development, implementation and performance.</li> <li>2) <u>Satellite/Tributary Communication Program</u>: There is no program in place to regularly communicate with satellite and tributary systems.</li> </ol> <p>Recommendation: The City should implement a regular communication program with the public and should provide the public the opportunity to provide input as the SSMP is implemented. Additionally, the City should implement a regular communication program with upstream satellites and downstream tributaries.</p>