

## California Regional Water Quality Control Board, San Diego Region

April 29, 2013

**Certified - Return Receipt Requested**  
7011 0470 0002 8961 8453

In reply, refer to: 631608:cmeans

Dennis Sperino  
Deputy Director of Utilities/Wastewater  
City of Escondido - HARRF  
1521 South Hale Avenue  
Escondido, CA 92029

**SUBJECT: NOTICE OF VIOLATION NO. R9-2013-0081 FOR UNAUTHORIZED DISCHARGE OF UNTREATED SEWAGE TO WATERS OF THE UNITED STATES; REQUIREMENT TO SUBMIT TECHNICAL REPORT PURSUANT TO SECTION 13267 OF THE CALIFORNIA WATER CODE**

Dear Mr. Sperino:

The City of Escondido (City) is hereby issued a Notice of Violation (NOV) for the reported unauthorized discharge of untreated sewage into waters of the United States during calendar year 2011. Pursuant to the requirements of section 13267 of the California Water Code (CWC), the City is directed to submit a technical report addressing the subject violation no later than **June 7, 2013**.

The City's sewage collection system is regulated by the State Water Resources Control Board (State Water Board) Order No. 2006-0003-DWQ (Sanitary Sewer System Waste Discharge Requirements, hereafter SSS WDRs) and San Diego Regional Water Quality Control Board (hereafter, San Diego Water Board) Order No. R9-2007-0005 (hereafter SDWB WDR). The SSS WDRs require enrollees to have a proactive system-wide, operation, maintenance, and management plan in place to reduce and prevent Sanitary Sewer Overflows (SSOs). In addition, the Sewer System Management Plans (SSMP) must contain a spill response plan to minimize any SSOs that do occur.

Prohibition C.1 of the SSS WDRs and Prohibition 7 of the SDWB WDR prohibit any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States. The City violated these requirements with one large Sanitary Sewer Overflow event (hereafter, SSO event) on August 28, 2011. This resulted in an illegal discharge of untreated sewage to waters of the United States, summarized below:

SSO Date	City Reported Discharge Volume (CIWQS)	Discharged From	Discharged To
08/28/2011	249,840 gallons	One manhole located immediately upstream of Hale Avenue Resource Recovery Facility (HARRF) influent pump station on HARRF property; and  One manhole located upstream of HARRF influent pump station at intersection of Pineapple Street and Cherry Tree Lane	Pacific Ocean, San Elijo Lagoon and Escondido Creek through a storm drain inlet located adjacent to HARRF

The City reported the SSO event into the California Integrated Water Quality System (CIWQS), the State Water Board's SSO Online Database.<sup>1</sup> The City initially submitted a report about this SSO event to the San Diego Water Board on August 29, 2011, and then voluntarily provided a follow-up report to the San Diego Water Board on November 4, 2011.

**CALIFORNIA WATER CODE SECTION 13267 ORDER**

The State Water Board's Special Investigation Unit of the Office of Enforcement is assisting the San Diego Water Board in its inspection of the subject discharge. Both the State and San Diego Water Board staff (hereafter, Water Board staff) have reviewed and determined that the City's November 4, 2011 Technical Report is insufficient to fully determine the nature, circumstances, extent, and gravity of the unauthorized discharge of untreated sewage. This CWC section 13267 Order (hereafter, Order) is issued to address those factors and assess the City's compliance with requirements to prevent and respond to the SSO event. As part of this evaluation, the Water Board staff will conduct a compliance audit of the City's sanitary sewer collection system program to evaluate compliance with the SSS and SDWB WDRs. The compliance audit will include a review of the City's SSMP, SSMP implementation, sewer maintenance, operations, and management strategies being implemented by the City to reduce SSOs. The financial burden of providing the required report bears a reasonable relationship to the need for the report and the benefits to be obtained from the report.

**The City is hereby required to submit the following information:**

1. Nature, Causes and Circumstances of the Illegal Discharge of Untreated Sewage on August 28, 2011:
  - a. A complete, detailed explanation of how and when the discharge of untreated sewage from the City's sewer collection system was discovered. This discussion shall include cause(s) of the SSO event that led to the SSO discharge, including, but not limited to: equipment failure(s), human/operator error(s), administrative control failure(s), maintenance and repair failure(s).

<sup>1</sup> Available at: <http://www.waterboards.ca.gov/ciwqs/publicreports.shtml#sso>

- b. A diagram showing all location(s) of the actual sewage overflows, including, but not limited to: discharge location(s) from sewer lines, laterals, connections, cleanouts, sewer relief valves, or other assets owned by the City, and discharge location(s) from all known assets not owned or operated by the City. Also include the locations of equipment that failed and the location of impacted waters, including impacted beaches.
- c. A detailed report of the total volume of untreated sewage discharged, including the engineering method(s), diagram(s), model(s), reference(s), calculation(s), record(s), and assumption(s) used in estimating the total volume of untreated sewage discharged. This should include, at a minimum, tabular and graphical summaries of the daily total influent flows of untreated sewage received by the treatment plant one week before and one week after the subject SSO event. Additionally, please submit electronic (in Microsoft Excel format) total daily influent and effluent flows monitored at the HARRF for calendar years 2011 and 2012.
- d. Indicate the date and time period(s) of sewer overflow discharge (e.g., number of hours or days of continuous and/or intermittent sewer overflow) and include all associated records and data relied upon including Supervisory Control And Data Acquisition (SCADA) records for determining the overflow periods and volume estimates. This shall include all detailed test data used by the City for determining the actual influent flow rates and wet well level/capacity determination as outlined in the City's November 4, 2011 Technical Report.

## 2. City's Response to the Illegal Discharge of Untreated Sewage on August 28, 2011:

- a. A detailed chronological description of all actions taken by the City to terminate the illegal discharge of untreated sewage, divert sewage flows from the headworks including any bypass, and mitigate the impacts from the discharge. The narrative description must include an evaluation of the results of selected actions.
- b. Evidence of the City's approval of the Sewer System Management Plan (SSMP), prepared in accordance with the SSS WDRs. Please describe how the procedures detailed in the City's Overflow Emergency Response Plan were implemented during the mitigation and response activities associated with the SSO event, including any suggested changes planned to improve the plan as a result of the SSO event.
- c. A detailed description of the final corrective action(s), including an update of the status of the final equipment repair/replacement, documentation of associated costs involved in implementing corrective action(s), sources of funding for the project, and standard operating procedures (SOPs) implemented to ensure proper operation and maintenance of installed equipment.
- d. Copies of any field response documents during and/or after the SSO event, including site photos, interview notes and information related to sewer backups into private structures, if applicable.

## 3. Additional Information

- a. Completion of the attached **Collection System Questionnaire** (A Microsoft Word version of the document is provided via email for your use.)

- b. Copies of collection system service call records for any potential SSO(s) including logs of complaints received from City service area customers and field maintenance crew records documenting City cleaning, maintenance, repairs, and SSO response activities over the past 12 months, including any records for work conducted by outside contractors for collection system maintenance or repairs.
- c. Any other pertinent information that will assist the Water Board staff in evaluating the nature, circumstances, extent, and gravity of the SSO event on August 28, 2011.

## PROVISIONS

1. Use of Registered Professionals: The City shall provide documentation that its Technical Report was prepared under the direction of appropriately qualified professionals. In preparing the Technical Report required by this Order, any engineering or geologic evaluations and judgments must be performed by or under the direction of registered professionals. A statement of qualifications and registration numbers of the responsible lead professional shall be included in the report submitted by the City. The lead professional shall sign and affix his/her registration stamp to the report.
2. Use of Qualified Technical Professionals: The City shall ensure that plans and reports required under this Order are prepared under the direction of technical professionals who are appropriately qualified to evaluate short and long term impacts to ecological receptors.
3. Signatory Requirements: The Technical Report shall be signed and certified by either a principal executive officer, ranking elected official, or the person with overall responsibility for environmental matters for that agency. Additional reports submitted in support of the Technical Report must be signed by the principal author.
4. Certification Statement: Any person signing a document under this provision shall make the following 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."*

- 5. Electronic Report Submittal: Paper submission of the Technical Report is not required if the electronic submission contains a copy of the signed certification statement and the e-mail affirms the certification statement therein.

The report required under this Order shall be submitted electronically to:

Leo Sarmiento, Water Resource Control Engineer  
 Office of Enforcement, Special Investigations Unit  
 California State Water Resources Control Board  
[lsarmiento@waterboards.ca.gov](mailto:lsarmiento@waterboards.ca.gov)

With an electronic copy to the San Diego Water Board, specifically to:

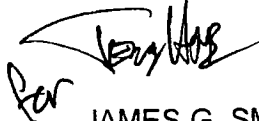
Christopher Means, Environmental Scientist  
 Compliance Assurance Unit, San Diego Regional Water Board  
[cmeans@waterboards.ca.gov](mailto:cmeans@waterboards.ca.gov)

Water Code section 13268 (a)(1) provides that any person failing or refusing to furnish technical or monitoring report information as required by Water Code section 13267(b), or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly for an administered imposed liability of up to \$1,000 per day for each day compliance is not achieved with an Order issued in accordance with subdivision 13268(b).

If you have any questions, please contact Leo Sarmiento, Water Resource Control Engineer, State Water Resources Control Board, Office of Enforcement, at (916) 327-8043 or email him at [lsarmiento@waterboards.ca.gov](mailto:lsarmiento@waterboards.ca.gov).

PLEASE INCLUDE "631608:cmeans" IN THE SUBJECT LINE OF FUTURE CORRESPONDENCE.

Respectfully,



JAMES G. SMITH  
 Assistant Executive Officer

Enclosure: Collection System Questionnaire

cc via email:

Dennis Sperino, Deputy Director of Utilities/Wastewater, City of Escondido  
 Clay Phillips, City Manager, City of Escondido  
 Christopher McKinney, Utilities Director, City of Escondido  
 Leo Sarmiento, Water Resource Control Engineer, State Water Board Office of Enforcement  
 Dr. Matthew Buffleben, PE, Chief, Special Investigations Unit, State Water Board, Office of Enforcement

Tech Staff Info & Use	
Order No	R9-2013-0081
Party ID	14960
Place ID	631608
Violation ID.	907161
Reg Measure ID	389928



# Sewer Collection System **PRE-INSPECTION QUESTIONNAIRE**

State Water Resources Control Board

Version 1.3

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## PART 1 — DESCRIPTION

This Sewer Collection System Pre-Inspection Questionnaire (Questionnaire) includes mandatory questions specific to the requirements in the Sanitary Sewer System Waste Discharge Requirements Water Quality Order No. 2006-0003-DWQ (hereafter SSSWDR), and its accompanying Amended Monitoring Plan Order No. 2008-0002-EXEC (hereafter Amended MRP).

All of the questions in this Questionnaire must be answered by the Enrollee (one Questionnaire for each collection system only) to demonstrate how the agency is complying with the SSSWDR and the Amended MRP. All responses provided in the Questionnaire along with the documentation required to be submitted by each Enrollee (see Part 3, Section 1) will be used by the Water Boards to prioritize inspection and enforcement activities statewide for the SSSWDR.

## PART 2 — INSTRUCTIONS

1. Complete all questions in the Questionnaire.
2. Save an electronic copy of the completed Pre-Inspection Questionnaire (in MS Word), and the other documentation required for your collection system (see Part 3, Section 1). Print the last page of this Questionnaire and sign it in ink. Submit the electronic copy (e.g., CD) and the original completed last page to:

**State Water Resources Control Board  
Office of Enforcement, Special Investigations Unit  
1001 I Street, 16<sup>th</sup> Floor, Sacramento, CA 95814**

## PART 3 — REQUIRED INFORMATION

### 1 DOCUMENTATION

Please mail an electronic copy (e.g., CD) of the following documents to:

**State Water Resources Control Board  
Office of Enforcement, Special Investigations Unit  
1001 I Street, 16<sup>th</sup> Floor, Sacramento, CA 95814**

- 1.1 Sewer System Management Plan [(SSMP) [Sanitary Sewer System General Waste Discharge Requirements (SSSWDR), Sect. D.13] and any documents referenced within the SSMP. Also include documentation showing approval of the SSMP by your agency's local governing board (e.g., Board Resolution or other documentation).
- 1.2 SSMP Program Audit<sup>1</sup> [SSSWDR, Sect. D.13(x)], if not contained within your agency's SSMP
- 1.3 Sewer System Area Map [SSSWDR, Sect. D.13(iv)], if not contained within your agency's SSMP
- 1.4 Local Sewer Use Ordinance [SSSWDR, Sects. D.13(iii) and D.13(vi)], if not contained within your agency's SSMP
- 1.5 Evidence of Agency's SSO Field Response Documentation [SSSWDR, Amended MRP, B.5], if not contained within your agency's SSMP

<sup>1</sup> To satisfy SSSWDR, Sect. D.13(x), the SSMP Audit must occur at least every two years following the original approval date of the agency's SSMP by the local governing board. The SSMP Audit must measure the effectiveness and compliance of an Enrollee's SSMP.



- 1.6 Rehabilitation and Replacement Plan [SSSWDR, Sect. D.13(iv)(c)], if not contained within your agency's SSMP
- 1.7 Capital Improvement Plan (CIP) Schedule for System Evaluation and Capacity Assurance Plan (SECAP) [SSSWDR, Sect. D.13(viii)], if not contained within your agency's SSMP

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## 2 Basic Information

- 2.1 Collection System Waste Discharge ID number (WDID) and Collection System Name: \_\_\_\_\_
- 2.2 Collection System Main Point(s) of Contact (name, title, address, email, and telephone number):  
\_\_\_\_\_

- 2.3 Type of Sanitary Sewer System (select ONE of the following: Municipal, Park, School, Military, Hospital, Prison, Airport, Port, Other)
- 2.4 What is the population served by your agency's sanitary sewer system?
- 2.5 What is this fiscal year's budget for operation and maintenance sanitary sewer system facilities?
- 2.6 What is this fiscal year's budget for capital expenditures for sanitary sewer system facilities?

*For questions 2.7 - 2.10, please identify the total number of employees (technical and mechanical) for your agency's sanitary sewer system (including pump station operations) working within the different classifications listed below.*

- 2.7 Entry Level (Less than 2 years experience)  
Number of agency employees?
- 2.8 Journey Level (Greater than or equal to 2 years experience)  
Number of agency employees?
- 2.9 Supervisory Level  
Number of agency employees?
- 2.10 Managerial Level  
Number of agency employees?

*For questions 2.11 – 2.14, please identify the total number of employees who hold CWEA Certification for Collection System Maintenance for your agency's sanitary sewer system (including pump station operations) for the various Certificates and Grades levels listed below.*

- 2.11 Grade I  
Number of certified (Grade I Collection System Maintenance) agency employees:  
Number of certified (Grade I Plant Maintenance Technologist) agency employees:
- 2.12 Grade II  
Number of certified (Grade II Collection System Maintenance) agency employees:  
Number of certified (Grade II Electrical/Instrumentation Technologist) agency employees:  
Number of certified (Grade II Mechanical Technologist) agency employees:
- 2.13 Grade III  
Number of certified (Grade III Collection System Maintenance) agency employees:

Number of certified (Grade III Electrical/Instrumentation Technologist) agency employees:

Number of certified (Grade III Mechanical Technologist) agency employees:

2.14 Grade IV

Number of certified (Grade IV Collection System Maintenance) agency employees:

Number of certified (Grade IV Electrical/Instrumentation Technologist) agency employees:

Number of certified (Grade IV Mechanical Technologist) agency employees:

2.15 Estimated Size Distribution of Assets

Diameter of sewer pipe	Gravity Sewers (miles)	Force Mains (miles)
6 inches or less	[# or ENTER ZERO]	[# or ENTER ZERO]
8 inches	[# or ENTER ZERO]	[# or ENTER ZERO]
9 - 18 inches	[# or ENTER ZERO]	[# or ENTER ZERO]
19 - 36 inches	[# or ENTER ZERO]	[# or ENTER ZERO]
> 36 inches	[# or ENTER ZERO]	[# or ENTER ZERO]
Unknown Diameter	[# or ENTER ZERO]	[# or ENTER ZERO]
Totals	[# or ENTER ZERO]	[# or ENTER ZERO]

2.16 For which portion of sewer service laterals is your agency responsible?

(If None, skip question 2.17.)

2.17 Estimated total miles of sewer service laterals (upper and lower) for which your agency is responsible?

2.18 Number of sewer service lateral connections?

2.19 Estimated total miles of easements within your sanitary sewer system?

2.20 What is your total easement sewer system cleaning production in miles/year?

2.21 What is your total gravity sewer system cleaning production in miles/year?

2.22 Does your agency own any separately enrolled collection systems? [Y/N]

2.23 If yes to question 2.22, which collection system(s) does your agency own?

Collection System name(s):

Collection System WDID(s):

2.24 Which wastewater treatment plant(s) (WWTPs) ultimately receive wastewater from this collection system?

Receiving Treatment Plant name(s):

Receiving Treatment Plant WDID(s):

2.25 For question 2.24, does your agency own this/these WWTP(s)? [Y/N]

2.26 Does your collection system discharge into any other collection system(s)]? [Y/N]

2.27 If yes to question 2.26, which collection system(s) receive wastewater from this collection system?

Receiving Collection System name(s):

Receiving Collection System WDID(s):

2.28 Do any upstream collection systems greater than 25,000 gallons/day (gpd) discharge into this collection system? [Y/N]

2.29 If yes to question 2.28, which collection system(s) discharge into this collection system?

Upstream Collection System name(s):

Upstream Collection System WDID(s):

2.30 Estimated Collection System Flow Characteristics for your collection system:

Average Daily Dry Weather Flow (MGD)	Peak Daily Wet Weather Flow (MGD)
[# or Unknown]	[# or Unknown]
Enter description here how info. Is derived (based on EDUs measured, etc.)	Enter description here how info. Is derived (based on EDUs measured, etc.)

2.31 How many pump stations are there throughout the sewer collection system?

2.32 How many feet of above ground gravity pipelines are there throughout the sewer collection system?

2.33 How many feet of above ground pressurized pipelines are located throughout the sewer collection system?

2.34 How many air relief valves (ARVs) are located throughout the sewer collection system?

2.35 How many siphons are there throughout the sewer collection system?

2.36 Specify the percentage of piping and the number of pump stations constructed:  
(note: total percentage must equal 100%)

Age	Source of Age Info. (records, estimated, etc.)	Gravity & Pressure Sewers (%)	Pump Stations <sup>2</sup> 25k Gal/day & Over (number of stations)	Pump Stations <sup>1</sup> Under 25k Gal/day (number of stations)
2000 - Present		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]

1980 - 1999		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]
1960 - 1979		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]
1940 - 1959		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]
1920 - 1939		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]
1900 - 1919		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]
Before 1900		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]
Unknown Age		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]
Totals		[%]	[# or ENTER ZERO]	[# or ENTER ZERO]

<sup>1</sup> For pump stations, flow categories are the maximum flow rate occurring over a 24-hr period based on annual operating data. Age is date asset was originally constructed.

### 3 ORGANIZATION

#### Local Governing Board Information

- 3.1 [SSSWDR, Sect. D.13(ii)]: Is/are your agency's Legally Responsible Official(s) and Data Submitter(s) registration information up-to-date with the State Water Board? [Y/N]
- 3.2 [SSSWDR, Sect. D.13(ii)]: If your local governing board has an internet website, please specify the internet address here:  
\_\_\_\_\_
- 3.3 [SSSWDR, Sect. D.13(ii)]: Please list the names and titles of each of your agency's current governing board members:  
\_\_\_\_\_

#### Sewer System Management Plan Information

- 3.4 [SSSWDR, Sect. E.]: Is your agency's SSMP available on your agency's website? [Y/N]
- 3.5 [SSSWDR, Sect. E.]: If yes to question 3.4, please provide the internet address here: \_\_\_\_\_

### 4 SEWER SYSTEM ASSETS

#### General System Information

- 4.1 [SSSWDR, Findings 2 & 3]: Please specify the basis for the population estimate in question 2.4 (e.g., official census data, estimated by agency, etc.)?

- 4.2 [SSSWDR, Sects. D.8, D.10]: What is the approximate size of the service area served by the sewer collection system for your agency, in square miles? [# or Unknown]
- 4.3 [SSSWDR, Sects. D.8, D.10]: Please describe the terrain within your agency's sewer service area (Mountainous, Hilly, Flat, Valley, etc.)?
- 4.4 [SSSWDR, Sects. D.8, D.10]: Please specify what percentage of the collection system's flow comes from residential, commercial, industrial, and institutional sources. [% FOR EACH or Unknown]

#### Asset Mapping

- 4.5 [SSSWDR, D.13(iv)]: Has your agency identified and mapped all the gravity sewer line segments, public access points (manholes, lamp holes, rod holes, etc.), pumping facilities, pressure pipes and valves, and stormwater-related facilities? [Y/N]
- 4.6 [SSSWDR, D.13(iv)]: Does your agency currently have sewer system assets mapped in a Geographic Information System (GIS)? [Y/N]
- 4.7 [SSSWDR, D.13(iv)]: Does your agency currently have stormwater-related facilities mapped in GIS? [Y/N]
- 4.8 [SSSWDR, D.8 and D.10]: What is the estimated number of gravity sewer line pipe segments located throughout the collection system? [# or Unknown]
- 4.9 [SSSWDR, D.13(iv)]: Does your agency have a formal review process in place to ensure that any mapping issues noted by field staff or others are addressed? [Y/N]
- 4.10 [SSSWDR, D.13(iv)]: Please indicate the total number of public access points (manholes, lamp holes, rod holes, etc.) located within your sewer collection system. [# or Unknown]

#### Sewer Service Laterals [SSSWDR, D.8, D.13(iv)]

- 4.11 Has your agency ever historically owned or maintained any portion of sewer service laterals? [Y/N or Unknown]
- 4.12 Does your agency have a voluntary sewer service lateral incentive program in place? [Y/N]
- 4.13 How many incoming complaints did your agency receive for privately-owned sewer service lateral problems in the previous fiscal year? [# or Unknown]
- 4.14 How many service calls did your agency respond to in the field for privately-owned service lateral problems in the previous fiscal year? [# or Unknown]

#### Pumping Facility Assets

For questions 4.15 – 4.32 refer to your pump station assets from question 2.31 (above)

- 4.15 [SSSWDR, D.8, D.13(iv)]: Has your agency mapped each pump station's actual GPS coordinates? [Y/N]
- 4.16 [SSSWDR, D.8, D.13(iv)]: Has your agency conducted a risk assessment for each asset? [Y/N]
- 4.17 [SSSWDR, D.8 and D.10]: How many of these assets have redundant pipelines installed? [#]
- 4.18 [SSSWDR, D.8 and D.10]: How many have dedicated emergency stand-by power generators located onsite? [#]
- 4.19 [SSSWDR, D.8 and D.10]: Has your agency developed standard and emergency operating procedures for each asset in the event of a power and/or pumping failure? [Y/N]
- 4.20 [SSSWDR, D.8 and D.10]: Has your agency determined the lowest hydraulic overflow point(s) and calculated the longest possible holding time(s) for each asset? [Y/N]
- 4.21 [SSSWDR, D.6(iii) and (vi), D.8 and D.10]: Has your agency identified critical spare parts for each asset? [Y/N]

- 4.22 [SSSWDR, D.6(iii) and (vi), D.8 and D.10]: For question 4.21, does your agency maintain the spare parts identified for each asset? [Y/N]
- 4.23 [SSSWDR, D.8 and D.10]: How many facilities are located within 100 feet of a surface water, creek or drainage channel? [#]
- 4.24 [SSSWDR, D.8 and D.10]: How many are located within 20 feet of a storm drain inlet? [#]
- 4.25 [SSSWDR, D.8 and D.10]: How many pump stations are equipped with audible and/or visual alarms located in public view to expedite notification to your agency in the event of an SSO? [#]
- 4.26 [SSSWDR, D.8 and D.10]: How many pump stations are equipped with an Auto Dialer Alarm System(s) for detecting pump failure and/or high wet well levels? [#]
- 4.27 [SSSWDR, D.8 and D.10]: How many have a supervisory, control and data acquisition system (SCADA) installed and operational? [#]
- 4.28 [SSSWDR, D.8 and D.10]: For question 4.27, how many can be remotely operated? [#]
- 4.29 [SSSWDR, D.8 and D.10]: How many pump stations display emergency notification signage, including agency contact information, in public view to expedite notification to your agency in the event of an SSO? [#]
- 4.30 [SSSWDR, D.8 and D.10]: Does your agency implement vandalism control efforts to discourage unauthorized access and/or vandalism to these assets? [#]
- 4.31 [SSSWDR, D.8 and D.10]: How many pump stations have built-in pumping bypass capability for emergency use? [#]
- 4.32 [SSSWDR, D.8 and D.10]: How many have electrical power connections installed to allow for the use of portable emergency generators? [#]

**Force Main Sewer Assets**

- 4.33 [SSSWDR, D.8, D.13(iv)]: How many sewer force mains are owned by your agency? [#]
- 4.34 [SSSWDR, D.8, D.13(iv)]: For the assets in question 4.33, has your agency conducted a risk assessment for each asset? [Y/N]
- 4.36 [SSSWDR, D.8 and D.10]: For the assets in question 4.33, how many have a dedicated corrosion protection system(s) installed? [#]
- 4.37 [SSSWDR, D.8 and D.10]: For the assets in question 4.33, what is the total number of air relief valves installed? [#]

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**5 FINANCIAL INFORMATION**

**Funding Sources and Revenues [SSSWDR, D.9]**

- 5.1 Does your agency utilize an Enterprise Fund for services provided to the public? [Y/N]
- 5.2 If yes to question 4.1, what are the total estimated annual revenues generated from this fund? [#]
- 5.3 If yes to 4.1, what is the current fund balance? [#]
- 5.4 Please provide a brief description of all sewer collection system funding source(s) (e.g., user fees, annual budget allocation, property taxes, etc.).
- 
- 5.5 What is your agency's total number of billed sewer connections? [# OR Unknown]
- 5.6 What is your agency's total number of billed customers for sewer service? [# OR Unknown]
- 5.7 What is your agency's current average monthly household user fee for sewage collection only? [\$ or Unknown]

5.8 For the answer in 4.7, what is your agency's sewer fee rate basis (e.g., measured flow, calculated flow, flat fee, etc.)

5.9 Has your local governing board approved any future sewer use fee increase(s)? [Y/N]

- 5.10 How much did your agency spend in the last fiscal year for operations and maintenance activities (O&M) of sewer assets? [\$]
- 5.11 How much did your agency spend in the last fiscal year on capital expenditures for sewer assets (e.g., new pipelines or equipment)? [\$]

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**6 LOCAL SEWER USE ORDINANCE [SSSWDR, D.13(iii) and/or D.13(vii)]**

- 6.1 Does your agency have an adopted sewer use ordinance (Ordinance)? [Y/N]  
If no to question 6.1, skip to question 7.1
- 6.2 Specify the date of last update/change of your agency's local Ordinance approved by your agency's local governing board. [DATE]
- 6.3 Specify the time frequency in which the Ordinance is reviewed. [FREQ]
- 6.4 Does your agency have legal authority within the Ordinance to limit and enforce illicit discharges from upstream public and/or private satellite collection system(s)? [Y/N]
- 6.5 If no to question 5.4, does your agency have service agreements or other procedures to limit and enforce illicit discharges from upstream public and/or private satellite collection system(s)? [Y/N]
- 6.6 Does the Ordinance ban inflow from stormwater sources? [Y/N]
- 6.7 Does the Ordinance specify who owns and/or maintains the sewer service lateral from the building foundation to the property line (upper lateral portion)? [Y/N]
- 6.8 Does the Ordinance specify who owns and/or maintains the sewer service lateral from the property line to the sewer main line (lower lateral portion)? [Y/N]
- 6.9 Does the Ordinance require testing and/or inspection of the sewer service lateral upon remodeling, renovations and/or transfer of property/residence? [Y/N]
- 6.10 Does the Ordinance prohibit illicit discharges from service connections into the sewer? [Y/N]
- 6.11 Does the Ordinance require sewers and connections to be properly designed and constructed? [Y/N]
- 6.12 Does the Ordinance require proper maintenance, inspection and repairs of laterals? [Y/N]
- 6.13 Does the Ordinance limit the discharge of fats, oils and grease (FOG) and other debris that may cause blockages? [Y/N]
- 6.14 Does the Ordinance give your agency the authority to inspect grease producing facilities? [Y/N]
- 6.15 Does the Ordinance reference the Uniform Building Code? [Y/N]
- 6.16 Does the Ordinance reference the California Plumbing Code? [Y/N]
- 6.17 Does the Ordinance give your agency the authority to inspect, maintain and repair assets located within sewer easements? [Y/N]
- 6.18 Does the Ordinance provide your agency with the proper authority to issue notices of violation (NOVs)? [Y/N]
- 6.19 If yes to question 6.18, how many NOVs has your agency issued in the past 3 years? [# or Unknown]
- 6.20 Does the Ordinance provide your agency with the proper authority to issue enforcement penalties for violators? [Y/N]
- 6.21 If yes to question 6.20, how many enforcement penalties has your agency issued in the past 3 years? [# or Unknown]
- 6.22 Does Ordinance provide your agency with the proper authority to ban connections and/or disconnect services for violators? [Y/N]
- 6.23 If yes to question 6.22, how many actions has your agency undertaken in the past 3 years? [Y/N]



6.24 Does the Ordinance provide your agency with the authority to limit future development and/or building? [Y/N]

6.25 If yes to question 6.24, how many actions has your agency undertaken in the past 3 years? [# or Unknown]

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## 7 CAPITAL IMPROVEMENT PLAN

7.1 [SSSWDR, D.9]: What is the approval date of your Sewer Capital Improvement Plan (Sewer CIP) by your agency's local governing board? [M/D/Y]

7.2 [SSSWDR, D.8 and D.13(iv)]: For question 7.1, is your Sewer CIP available on the internet for public review? [Y/N]

7.3 [SSSWDR, D.8 and D.13(iv)]: If yes to question 7.2, please specify the internet address:  
\_\_\_\_\_

7.4 [SSSWDR, D.8 and D.13(iv)]: What is the projected date of your next Sewer CIP update? [M/D/Y]

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## 8 OPERATIONS AND MAINTENANCE PROGRAM

### Computerized Maintenance Management System (CMMS)

8.1 [SSSWDR, D.8 and D.13(iv)]: Does your agency use a computerized maintenance management system (CMMS) to generate work orders and track sewer maintenance, operations and management information? [Y/N]

8.2 [SSSWDR, D.7 and D.13(iv)]: If yes to question 8.1, is CMMS data used for ongoing strategies to eliminate/reduce SSOs? [Y/N]

8.3 [SSSWDR, D.7 and D.13(iv)]: If yes to question 8.1, is the CMMS data used to evaluate cleaning production rates? [Y/N]

8.4 [SSSWDR, D.7, D.13(iv) and D.13(ix)]: If yes to question 8.1, does your agency use the CMMS information to provide data for tracking system trends, problems and/or performance? [Y/N]

8.5 [SSSWDR, D.7, D.13(iv) and D.13(ix)]: If no to question 8.1, does your agency have a different method in place to provide data for tracking system trends, problems and/or performance? [Y/N]

### Inspections, Operations and Management Activities

8.6 [SSSWDR, D.8, D.13(iv)]: What was your agency's total gravity sewer collection system cleaning production (hydro flushing, mechanical and hand rodding) over the past 12 months (miles per year)? [# or Unknown]

8.7 [SSSWDR, D.8, D.13(iv)]: What is your agency's total gravity sewer collection system cleaning production scheduled (hydro flushing, mechanical and hand rodding) for the next 12 months (miles per year)? [# or Unknown]

8.8 [SSSWDR, D.8, D.13(iv)]: What was your agency's total video (CCTV) inspection production in the past 12 months (miles)? [# or Unknown]

8.9 [SSSWDR, D.8, D.13(iv)]: What is your agency's total video (CCTV) inspection production scheduled for the next 12 months (miles)? [# or Unknown]

8.10 [SSSWDR, D.8, D.13(iv)]: Does your agency have a method in use for reviewing and analyzing force main sewers and their components? [Y/N]

8.11 [SSSWDR, D.7 and D.13(iv)]: What is the total number of focused problem areas ("SSO hot spots") located throughout the collection system? [# or Unknown]

8.12 [SSSWDR, D.8 and D.10]: Does your agency have a program to inspect and maintain air relief valves (ARVs)? [Y/N/ n/a]

8.13 [SSSWDR, D.8 and D.10]: How many ARVs are not accessible for inspection/maintenance? [#/ n/a]

8.14 [SSSWDR, D.7 and D.13(iv)]: What was the total number of ARVs exercised and cleaned in past 12 months? [# or Unknown]

- 8.15 [SSSWDR, D.7 and D.13(iv)]: What is the total number of ARVs planned to be exercised and cleaned in the next 12 months? [# or Unknown]
- 8.16 [SSSWDR, D.13(iv)]: What is the total number of public access points (manholes, lamp holes, rod holes, etc.) inspected in the past 12 months? [# or Unknown]
- 8.17 [SSSWDR, D.13(iv)]: What is the total number of public access points (manholes, lamp holes, rod holes, etc.) scheduled to be inspected in the next 12 months? [# or Unknown]
- 8.18 [SSSWDR, D.13(iv)]: Does your agency visually inspect pipeline routes at least annually, and after major storms, earthquakes or other events that could damage these assets, to check for sink holes or leaks along force main(s)? [Y/N]
- 8.19 [SSSWDR, D.13(iv)]: How many above ground crossings (if applicable) were inspected in the past 12 months? [#, N/A or Unknown]
- 8.20 [SSSWDR, D.13(iv)]: How many siphons (if applicable) were inspected in the past 12 months? [#, N/A or Unknown]
- 8.21 [SSSWDR, D.13(iv)]: Does your agency have a process to identify areas subject to excess hydrogen sulfide corrosion? [Y or N]
- 8.22 [SSSWDR, D.13(iv)]: Does your agency have a formal pipe grading process in place to identify pipe discontinuities? [Y or N]
- 8.23 [SSSWDR, D.13(iv)]: Does your agency require video (CCTV) inspections before and after cleaning to measure the effectiveness of these activities? [#]
- 8.24 [SSSWDR, D.13(iv)]: Does your agency video (CCTV) inspect pipes after all SSO(s)? [Y/N]
- 8.25 [SSSWDR, D.13(iv)]: Does your agency conduct smoke, dye or other tests to check for illicit connections? [Y/N]
- 8.26 [SSSWDR, D.13(iv)]: If yes to question 8.25, how many miles of sewer system were tested in the past 12 months? [# or Unknown]
- 8.27 [SSSWDR, D.13(iv)]: Does your agency use video (CCTV) to monitor discharger compliance for illicit connections? [Y/N]
- 8.28 [SSSWDR, D.13(iv)]: If yes to question 8.27, list the total number of miles of video (CCTV) inspection conducted for this purpose in the past 12 months. [# or Unknown]
- 8.29 [SSSWDR, D.13(iv) and D.13(viii)]: Does your agency have formal agreements in place to increase resources through established mutual assistance agreements with other agencies/contractors for wet weather episodes or for SSO response activities? [Y/N]
- 8.30 [SSSWDR, D.13(iv) and D.13(viii)]: Does your agency have a program in place to identify areas with inflow and infiltration (I/I)? [Y/N]
- 8.31 [SSSWDR, D.13(iv) and D.13(viii)]: If yes to question 8.30, estimate the total number of miles identified by this program. [# or Unknown]
- 8.32 [SSSWDR, D.13(iv)]: Does your agency have an active root control program in place? [Y/N]
- 8.33 [SSSWDR, D.13(iv)]: If yes to question 8.32, please list the type(s) of control efforts in place (e.g., chemical, mechanical, etc.).
- 8.34 [SSSWDR, D.13(iv)]: If your agency uses chemical(s) for root control, please list chemical(s) used. [N/A if no chem. root program]

Fats, Oils and Grease [SSSWDR, D.13(iv) and D.13(viii)]

- 8.35 Does your agency have a commercial FOG program in place? [Y/N]
- 8.36 If no to question 8.35, has your agency justified in its SSMP why a FOG program is not needed? [Y/N]
- 8.37 If yes to question 8.35, does your agency have a FOG Ordinance separate from the sewer use ordinance? [Y/N]
- 8.38 If yes to question 7.37, please list the FOG Ordinance citation number:
- 8.39 If yes to question 8.35, approximately how many food service establishments (FSEs) such as restaurants, schools, hospitals, jails, and convalescent homes are subject to FOG control. [#]

- 8.40 If yes to question 8.35, what is the total number of FSE permits issued for FOG control? [#]
- 8.41 If yes to question 8.35, what is the total number of dedicated FSE FOG inspectors? [#]
- 8.42 If yes to question 8.35, how many FSE FOG inspections were conducted in past 12 months? [#]
- 8.43 If yes to question 8.35, how many FSE FOG enforcement action(s) were initiated in the past 12 months?
- 8.44 If yes to question 8.35, how many FSE FOG inspections are planned for the next 12 months? [#]
- 8.45 Does your agency have a residential FOG program in place? [Y/N]
- 8.46 If yes to question 8.45, briefly describe the program: \_\_\_\_\_

**Sewer Contract Services**

- 8.47 [SSSWDR, D.8 and D.13(iv)]: Does your agency retain contract service(s) for sewer collection system maintenance, operations, and/or management? [Y/N]
- 8.48 [SSSWDR, D.8 and D.13(iv)]: If yes to question 8.47, for services in excess of \$10,000/year, please provide some basic information about these services in the table below:

Contractor Name	Description (cleaning, root control, repairs, , etc.)	Frequency of Contract	Budget (annual \$)

**9 SSO EMERGENCY RESPONSE PROGRAM [SSSWDR, D.13(vi)]**

- 9.1 Does your agency's SSO Emergency Response Plan incorporate procedures for pump stations/force main sewers? [Y/N]
- 9.2 Does your agency have a dispatcher(s) within your agency to handle, dispatch and document incoming complaints from your sewer system customers? [Y/N]
- 9.3 If yes to 9.2, does your agency utilize a dispatch radio system for notifying collection crews who respond to SSOs? [Y/N]
- 9.4 If yes to 9.3, please list the frequency(s) in use for the dispatch radio system: \_\_\_\_\_
- 9.5 Does your agency have standard operating procedures (SOPs) in place to test and document, at least once per year, the performance of its after-hours emergency notification system(s)? [Y/N]
- 9.6 Does your agency provide and document any scenario-based SSO emergency response simulation training for collections staff at least on an annual basis to ensure staff are properly trained and prepared in the event of an SSO? [Y/N]
- 9.7 If yes to 9.6, does this training include practical exercises including researching SSO start times and calculating the SSO volume spilled and recovered? [Y/N]
- 9.8 Do your emergency operating procedures (EOPs) include requirements to determine the impact of an SSO, including accelerated or additional environmental monitoring? [Y/N]

**10 SSO REDUCTION PERFORMANCE AND MONITORING PROGRAM [SSSWDR, D.13(ix)]**

- 10.1 Does your agency have a process in place to collect data to monitor performance of its SSMP and efforts in reducing SSOs? [Y/N]
- 10.2 If yes to question 9.1, does your agency use the data collected to update SSMP program elements? [Y/N]

## 1 COLLECTIONS STAFFING AND TRAINING

- 11.1 [SSSWDR, D.9]: What is the total number of dedicated sewer maintenance crews in place at your agency? [#]
- 11.2 [SSSWDR, D.9]: For question 11.1, how many staff are typically in each maintenance crew? [#]
- 11.3 [SSSWDR, D.9 and D.13(iv)(d)]: Does your agency have a program in place to identify and document the core competencies/capabilities of collections staff at least on an annual basis (examples include sewer line cleaning, point repairs, video (CCTV) inspection, pump station maintenance, excavation, utility line locating, etc.)? [Y/N]
- 11.4 [SSSWDR, D.9]: If yes to question 11.3, does this program identify gap(s) in competencies/capabilities of collections staff? [Y/N]
- 11.5 [SSSWDR, E]: Does your agency require collections staff to review the SSSWDR and the agency's SSMP at least annually? [Y/N]
- 11.6 [SSSWDR, D.9]: Does your agency use a workforce planning/retention program to ensure adequate future collections staff? [Y/N]
- 11.7 [SSSWDR, D.8 and D.13(iv) and (vi)]: Does your agency provide initial and recurrent training to appropriate staff (including outside contractor(s)) regarding your agency's SSO Emergency Response Plan and O&M programs? [Y/N]
- 11.8 [SSSWDR, D.8 and D.13(iv) and (vi)]: If yes to 11.7, what is the total number of individuals trained in the past 12 months. [#]
- 11.9 [SSSWDR, D.8 and D.13(iv) and (vi)]: For contracted sewer services, do your contracting specifications contain specific language requiring initial and recurrent training of contractor staff regarding your agency's SSO Emergency Response Plan and O&M programs? [Y/N]

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## 12 MAJOR EQUIPMENT INVENTORY [SSSWDR, D.4, D.7, D.8, D.13(iv)]

- 12.1 How many combination truck(s) (hydro flush/vacuum models) are owned and/or leased by your agency? [#]
- 12.2 For question 11.1, how many have a dedicated logbook(s) to document fieldwork activities? [#]
- 12.3 How many hydro flusher(s) are owned and/or leased by your agency? [#]
- 12.4 How many mechanical rodder(s) are owned and/or leased by your agency? [#]
- 12.5 How many video (CCTV) inspection vehicle(s) are owned and/or leased by your agency? [#]
- 12.6 How many utility truck(s) are owned and/or leased by your agency? [#]
- 12.7 How many portable sewage pump(s) are owned and/or leased by your agency? [#]
- 12.8 How many portable generator(s) are owned and/or leased by your agency? [#]
- 12.9 Does your agency own equipment designed to block the storm drain system, in an emergency, to prevent untreated or partially treated wastewater from reaching surface waters? [Y/N]

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## 13 EXTERNAL COMMUNICATIONS PROGRAM

- 13.1 [SSSWDR, D.13(xi)]: Does your agency have a program in place for communicating on a regular basis with the public regarding the development, implementation, and performance of its SSMP?
- 13.2 [SSSWDR, D.13(xi)]: Does your agency have a program in place for communicating with upstream or downstream satellite sewer system(s) connected to its collection system? [Y/N or N/A]
- 13.3 [SSSWDR, D.11]: Does your agency participate in responding to Underground Service Alert(s) (USA) or other similar organizations to identify and mark sewer lines? [Y/N]
- 13.4 [SSSWDR, D.7, D.13(iv), G, and Amended MRP]: Does your agency's communication program give the public the opportunity to provide input as your SSMP is being implemented? [Y/N]

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## 14 NOTIFICATION, REPORTING AND RECORD KEEPING

- 14.1 [SSSWDR, Amended MRP B(5)]: Are all the records required in the Amended MRP, B(5) ("Record Keeping") readily available for review by the Water Boards? [Y/N]
- 14.2 [SSSWDR, Amended MRP, B(5)]: Does your agency maintain a list and description of all sewer-related complaints from customers for the past 5 years, including calls received after normal working hours? [Y/N]
- 14.3 [SSSWDR, Amended MRP, B(5)]: If yes to question 13.2, does this include information regarding privately owned sewer laterals? [Y/N]
- 14.4 [SSSWDR, G, and Amended MRP]: Does your agency have a quality assurance/quality control (QA/QC) procedure in place for review of technical information collected by field staff prior to certification of the SSO report(s) in the Water Board's online reporting system (CIWQS) by the Legally Responsible Official(s)? [Y/N]
- 14.5 [SSSWDR, G and Amended MRP]: Does your agency require crews to take photos of all SSOs? [Y/N]
- 14.6 [SSSWDR, G and Amended MRP]: If no to question 14.5, does your agency at least require crews to take photos of SSOs that result in backups into structures? [Y/N]
- 14.7 [SSSWDR, G and Amended MRP]: Does your agency have a procedure(s) in place for collecting field information to assist in determining the actual SSO start time? [Y/N]
- 14.8 [SSSWDR, G and Amended MRP]: Does your agency use SOPs to estimate SSO volume spilled, recovered and not recovered, including estimation of cleanup water used? [Y/N]
- 14.9 [SSSWDR, G and Amended MRP]: Does your agency regularly update initial reports given to the California Emergency Management Agency, local health department, and Regional Board as information develops regarding SSOs requiring notification? [Y/N]
- 14.10 [Amended MRP, B.6]: Does your agency maintain water quality monitoring records as required by the Amended MRP, section B(6)?

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## 15 SSO PREVENTION AND MITIGATION

- 15.1 [SSSWDR, D.13(ix)]: Does your agency generate SSO reduction performance metric(s) for its collection system for use in future planning? [Y/N]
- 15.2 [SSSWDR, D.13(ix)]: Does your agency have a program in place to conduct periodic video (CCTV) inspections of areas throughout the collection system that have never been evaluated by video (CCTV) to date? [Y/N or N/A]
- 15.3 [SSSWDR, D.13(ix)]: Does your agency document meetings between O&M and source control staff, if applicable? [Y/N or N/A]
- 15.4 [SSSWDR, 8 and D.6]: Does your agency document meetings between O&M and engineering staff to discuss system problem areas and projects, if applicable? [Y/N or N/A]
- 15.5 [SSSWDR, 8 and D.6]: Does your agency hold post-SSO briefings with collections staff, management and others involved, to evaluate root cause of SSOs and document service changes necessary to be prepared in responding to SSOs in the future? [Y/N]
- 15.6 [SSSWDR, 8 and D.6]: Does your agency pursue investigation of upstream satellite(s) or potential illicit dischargers as part of the SSO cause determination process? [Y/N]
- 15.7 [SSSWDR, 8 and D.6]: Does your agency adjust sewer collection system cleaning interval(s) for problem areas based on review and analysis of each past SSO? [Y/N]

- 15.8 [SSSWDR, 8 and D.6]: How many of the SSOs over the past 12 months were preventable through more proactive maintenance? [# OR Unknown]
- 15.9 [SSSWDR, 8 and D.6]: How many of the SSOs over the past 4 years occurred at repeat locations? [# OR Unknown]

**INSTRUCTIONS: Please print this page, sign it, and mail the original of this page to:**

State Water Resources Control Board  
Office of Enforcement, Special Investigations Unit  
1001 I Street, 16<sup>th</sup> Floor, Sacramento, CA 95814

*I, \_\_\_\_\_, the approved Legally Responsible Official (LRO) of collection system (name and Waste Discharge ID#) \_\_\_\_\_ certify under penalty of law that based on my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information, the information in this Pre-Inspection Questionnaire (Version 1.0) 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 a fine or imprisonment, for knowing violations.*

\_\_\_\_\_  
LRO Signature

\_\_\_\_\_  
Date