

Malaga County Water District

Sewer System Management Plan Update

December 2024

Prepared for:
Malaga County Water District

Prepared by:
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**PROVOST &
PRITCHARD**

SEWER SYSTEM MANAGEMENT PLAN

MALAGA COUNTY WATER DISTRICT

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ABBREVIATIONS / ACRONYMS

2022 SSS Order or General Order	General Order WQ 2022-0103-DWQ
AB	Assembly Bill
BAT	Best Available Technology
BMP	Best Management Practice
BREA	Business Risk Exposure Analysis
CCTV	Closed-Circuit Television
CFR	Code of Federal Regulations
CIP	Capital Improvement Plan or Capital Improvement Program
CM	Corrective Maintenance
CMMS	Computerized Maintenance Management System
CS	Collection System
CWD	County Water District
CWEA	California Water Environment Association
DWQ	Division of Water Quality
ERP	Emergency Response Plan
FID	Fresno Irrigation District
FOG	Fats, Oils, and Grease
FSE	Food Service Establishment
GIS	Geographical Information Systems
GPS	Global Positioning System
I/I	Inflow / Infiltration
IERP	Integrated Emergency Response Plan
LRO	Legally Responsible Official
MCWD	Malaga County Water District
MRP	Monitoring and Reporting Program
NOA	Notice of Applicability
NPDES	National Pollutant Discharge Elimination System
NRWDP	Non Residential Wastewater Discharge Permit
O&M	Operation and Maintenance
OES	Office of Emergency Services
PM	Preventative Maintenance
PMO	Program Management Office
PMP	Preventative Maintenance Program
R&R	Rehabilitation and Replacement
RWQCB or Regional Board	Regional Water Quality Control Board
SCADA	Supervisory Control and Data Acquisition
SERP	Spill Emergency Response Plan
SMP	Standard Maintenance Procedure
SOP	Standard Operating Procedure
SSO	Sanitary Sewer Overflow and any sewer spill or overflow of sewage

SEWER SYSTEM MANAGEMENT PLAN

MALAGA COUNTY WATER DISTRICT

SSMP	Sewer System Management Plan
SWRCB	State Water Resources Control Board
WDR	Waste Discharge Requirements
WWTP	Wastewater Treatment Plant

CERTIFICATION

On behalf of Malaga County Water District, I hereby certify that this Sewer System Management Plan was adopted at a regularly scheduled meeting of the Malaga County Water District Board of Directors held on _____, 2025.

Malaga County Water District

EXECUTIVE SUMMARY

Malaga County Water District (MCWD) is required to comply with the State Water Resources Control Board Order No. WQ 2022-0103-DWQ. The purpose of the Order is to require agencies to prepare a plan and schedule for measures to be implemented to prevent sanitary sewer overflows (SSOs), as well as measures to effectively clean up and report SSOs.

To comply with the essence of this Order, MCWD shall:

- Comply with federal and state prohibitions of discharge of sewage to waters of the State, including federal waters of the United States;
- Comply with specifications, and notification, monitoring, reporting and recordkeeping requirements in this General Order that implement the federal Clean Water Act, the California Water Code (Water Code), water quality control plans (including Regional Water Board Basin Plans) and policies;
- Proactively operate and maintain resilient sanitary sewer systems to prevent spills;
- Eliminate discharges of sewage to waters of the State through effective implementation of a Sewer System Management Plan;
- Monitor, track, and analyze spills for ongoing system-specific performance improvements; and
- Report noncompliance with this General Order per reporting requirements.

This Sewer System Management Plan (SSMP) is organized to correspond to the sections of the Order. The SSMP consists of twelve chapters. In general, each chapter begins with a summary of Order requirements, followed by these subsections:

- Compliance Summary – A description of how compliance was achieved;
- Compliance Documents – A listing of source documents that support compliance and the location of these documents; and,
- Roles and Responsibilities – A listing of relevant staff roles and responsibilities.

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1 PROHIBITIONS AND PROVISIONS

This chapter describes the sewage discharge prohibitions and thirteen provisions prescribed in the Order.

1.1 PROHIBITIONS

To meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, MCWD is required to comply with the following prohibitions:

- Discharge of Sewage from a Sanitary Sewer System;
- Discharge of Sewage to Waters of the State;
- Discharge of Sewage Creating a Nuisance.

In any enforcement action, the Regional Board will consider the efforts of Malaga County Water District (MCWD) to contain, control, and clean up sewage spills from its collection system in accordance with Section 13327 of the California Water Code. MCWD will make every effort to contain sewage spilled from its collection systems and to prevent the sewage from entering storm drains and surface water bodies. MCWD will also make every effort to prevent sewage from discharging from storm drains into flood control channels and open ditches by blocking the storm drainage system and by removing the sewage from the storm drains.

1.2 PROVISIONS

The Enrollee must meet the thirteen provisions described in the Order.

The mandatory elements of the SSMP are listed below.

Sewer System Management Plan (SSMP)

- i) Goals and Introduction
- ii) Description of Organization
- iii) Legal Authority
- iv) Operation and Maintenance Program
- v) Design and Performance Provisions:
- vi) Spill Emergency Response Plan
- vii) Sewer Pipe Blockage Control Program
- viii) System Evaluation and Capacity Assurance Plan
- ix) Monitoring, Measurement, and Program Modifications
- x) SSMP Internal Audits
- xi) Communication Program

2 GOALS AND INTRODUCTION

This chapter describes the goals of the SSMP. MCWD is required to comply with the State Water Resources Control Board Order No. WQ 2022-0103-DWQ.

2.1 REGULATORY CONTEXT

WDR Order No. 2022-0103-DWQ Attachment D states:

The goal of the SSMP 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:

- The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates.
- 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.
- 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 Element 4.

2.2 PURPOSE

The purpose of the Order is to prevent SSOs. MCWD is required to prepare and maintain the SSMP to support this purpose.

MCWD shall properly fund, manage, operate and maintain, with adequately trained staff and/or contractors possessing adequate knowledge skills and abilities as demonstrated through a validated program at all times, all parts of the sewage collection system owned and/or operated by MCWD.

CHAPTER TWO

2.3 GOALS

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

As required by the SWRCB, a copy of the Order is maintained at appropriate locations (as discussed in Section E of the Order) and is available to sanitary sewer system operating and maintenance personnel at all times. A copy of the Order and the Monitoring and Reporting Program are included as **Appendix A** of this SSMP. Pursuant to California Water Code Section 13267(b), MCWD will also comply with the SSO “Monitoring and Reporting Program No. 2022-0103” (Monitoring and Reporting Program) and all future revisions, included by reference in the Order.

2.4 SEWER SYSTEM MANAGEMENT PLAN UPDATE SCHEDULE

The MCWD enrolled in the original 2006 Sanitary Sewer System General Order, 2006-0003-DWQ. The initial Sewer System Management Plan is dated April 8, 2010. The MCWD performed audits of the SSMP every two (2) years. The State Water Resources Control Board confirmed the start date of coverage under the 2022 SSS General Order, WQ 2022-0103-DWQ, effective June 5, 2023.

The 2022 SSS Order, in Section 5.5 and Attachment E1, Section 3.11, now requires Plan updates every six years after the required due date of the Enrollee’s last Plan Update. Per Section 5.4 and Attachment E1, Section 3.10 of the 2022 SSS Order, the Audit Report is due within six months after the end of the required 3-year internal audit period. The MCWD Plan Update and Internal Audit Schedule is presented below.

Table 2-1: SSMP Update and Internal Audit Schedule

SSMP Update and Internal Audit Schedule		
SSMP Update Dates and Revision Number	SSMP Plan Update	Internal Audit Dates
SSMP Update adopted January 14, 2025 to comply with 2022 SSS Order	January 2025	
Internal Audit required from previous Order January 2023		January 15, 2026 Submit to CIWQS by July 1, 2026
Internal Audit		January 15, 2029 Submit to CIWQS by July 1, 2029
SSMP Update	January 2031	
Internal Audit		January 15, 2032 Submit to CIWQS by July 1, 2032

CHAPTER TWO

Internal Audit		January 15, 2035 Submit to CIWQS by July 1, 2035
SSMP Update	January 2037	

MCWD has prepared this SSMP to ensure full compliance with the Order. This SSMP provides a description of how MCWD complies with the various provisions of the Order and provides references to supporting documents. Some support materials, such as large format drawings, relational databases, and voluminous documents may not be physically included in the SSMP. In these cases, a reference will be provided within the SSMP that indicates the type, owner, and location of these support materials.

2.5 SEWER SYSTEM ASSET OVERVIEW

The overview of the equipment for the system is included in **Appendix B**.

The collection system assets are summarized in Table 2-2.

Table 2-2: Collection System Assets

MCWD Collection System Assets	
Asset Description	Details
Service Area (acres)	1,667.68 acres
Total System Length (feet)	81,615
Total Gravity Main Length (feet)	81,615
Total Force Main Length (feet)	0
Total Lateral Length (feet)	unknown
Number of Sewer Manholes	205
Number of Sewer Cleanouts	0
Number of Lift or Pump Stations	3
Number of Stormwater diversion structures to Sewer Collection System	Zero (0)
Data Management System(s)	_____
Percentage of Residential, Commercial, and Industrial, Connections	100%
Sewer system ownership and operation responsibilities between Enrollee and Private entities for upper and lower sewer laterals	The MCWD is not legally responsible for laterals from private property
Unique service boundary conditions and challenges	State Route 99 crosses through the middle of the sewer system.

3 DESCRIPTION OF ORGANIZATION

This chapter describes MCWD's organization and chain of communication.

3.1 RESPONSIBLE OR AUTHORIZED REPRESENTATIVE

The Order requires that the SSMP identify the name of the responsible or authorized representative as described in Section J of the Order. The Order also requires that the SSMP identify the names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation.

WDR Order No. 2022-0103-DWQ Attachment D states:

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

- The name of the LRO as required in Section 5.1 (Designation of a Legally Responsible Official) of this Order.
- The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific SSMP 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 application. (For example, county health officer, county environmental health agency, and State Office of Emergency Services).

3.1.1 COMPLIANCE SUMMARY.

The positions described provide sufficient staffing to operate the sewer system on a sustainable basis, and to comply with all requirements of this Order. The District Board governs the District through the District Manager, who directs the District staff. The District Manager also coordinates the actions of the District with the consultants.

3.1.2 COMPLIANCE DOCUMENTS.

The MCWD organization chart meets the Order requirements for this section. A copy of the MCWD organization chart is included in **Appendix C**. The organization chart includes the administrative and maintenance positions (and lines of authority) responsible for implementing SSMP program measures.

3.1.3 ROLES AND RESPONSIBILITIES.

Primary responsibility for the day-to-day management and O&M of the collection facility assets resides with the District Manager.

3.2 LEGALLY RESPONSIBLE OFFICIAL (LRO)

The current Legally Responsible Official(s) designated in CIWQS is listed in Table 3-1.

Table 3-1: Designated Legally Responsible Official

Designated Legally Responsible Official			
Name	Title	CIWQS Relationship Start Date	CIWQS Party Number
Burt Siverling	WWTF Chief Operator		

3.3 PLAN IMPLEMENTATION

The position titles, names, phone numbers and e-mails of management, administrative, and maintenance Staff who are responsible for implementing specific elements of the SSMP are located in Table 3-2 below along with their specific responsibilities.

Table 3-2: Staff and Contractor Plan Element Responsibilities and Contact Information

Staff and Contractor Plan Element Responsibilities and Contact Information		
Position Title and Name	SSMP Responsibilities	Contact Information
MCWD		
Burt Siverling	Directs staff in the management of all SSMP Elements. Direct supervision and management of the SSMP.	Phone: (559) 907-4496 E-Mail: bsiverling@malagacwd.org

Commented [MT1]: I am not sure Burt is directing staff on this

3.2.1 COMPLIANCE SUMMARY.

MCWD's chain of communication for reporting SSOs can be summarized by the following: The Sewer Collection System Operator reports SSOs to the Field Manager. The Field Manager then reports SSOs to the RWQCB and any other appropriate entities. The following agencies are to be notified if there is a potential exposure to SSO pollutants:

- Fresno Metropolitan Flood Control District (FMFCD) (559) 456-3292
- Fresno Irrigation District (FID) (559) 233-7161
- County of Fresno (559) 262-4107
- Regional Water Quality Control Board (RWQCB) (559) 445-5116

MCWD's chain of communication for reporting SSOs is described in detail in the MCWD Sewer Spill Response Plan.

Commented [MM2]: Spill Response Plan (Appendix G)?

Commented [MT3R2]: Yes I think overflow has been replaced with Spill in most documents in the Appendix

CHAPTER THREE

3.3.2 COMPLIANCE DOCUMENTS.

The MCWD Sewer Spill Response Plan meets the Order requirements for this section. A copy of the MCWD Sewer Spill Response Plan is included in **Appendix G**.

3.3.3 ROLES AND RESPONSIBILITIES.

The roles and responsibilities of each position are described in detail in the MCWD Sewer Spill Response Plan.

4 LEGAL AUTHORITY

This chapter describes the legal authority to implement the SSMP plans and procedures.

WDR Order No. 2022-0103-DWQ Attachment D states:

In accordance with the 2022 SSS Order, 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 which require sewer system operations and maintenance as applicable.

4.1.1 COMPLIANCE SUMMARY.

This SSMP complies with the Order requirements for legal authority to implement the SSMP plans and procedures under the MCWD Sewer Use Ordinance No. 2013-1.

The prevention of illicit discharges into the MCWD sanitary sewer system is achieved through the requirements set forth under "Title 3, Chapter 1: General Provisions, Chapter 3: Building Sewers, Lateral Sewers and Connections, Chapter 4: Public Sewer Construction, Chapter 5: Use of Public Sewers" and "Chapter 6: Permit Issuance" of the Sewer Use Ordinance.

The design and construction of new lateral connections and bypass piping facilities is legally enforced through MCWD's connection permit program. MCWD issues permits to property owners and/or tenants of property owners. Approved design and construction standards are maintained at the District office. Inspection and testing of new system connections is governed by the permit and related construction standards. Reference is made to "Chapter 3: Building Sewers, Lateral Sewers and Connections" and "Chapter 4: Public Sewer Construction" of Title 3 of the MCWD Sewer Use Ordinance.

The ability to ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency is achieved through "Chapter 3: Building Sewers,

CHAPTER FOUR

Lateral Sewers and Connections, Chapter 8: Enforcement” and Chapter 9: Administrative Citations” of Title 1of the MCWD Sewer Use Ordinance.

The discharge of fats, oils, grease and other debris that may cause blockages is limited by the contents of “Chapter 5: Use of Public Sewers” of Title 3 of the MCWD Sewer Use Ordinance.

The actions to enforce any violation of the MCWD sewer ordinances are defined through “Chapter 8: Enforcement” of the MCWD Sewer Use Ordinance.

4.1.2 COMPLIANCE DOCUMENTS.

The legal authority for enacting the SSMP programs and policies are included in the following documents:

- MCWD Sewer Use Ordinance (**Appendix D**).

4.1.3 ROLES AND RESPONSIBILITIES.

The roles and responsibilities for enforcement of the legal authority to enact the SSMP programs and policies are derived from acts of MCWD’s governing Board. Interpretation of the enabling state legislation giving authority to MCWD is provided by MCWD General Counsel.

5 OPERATION AND MAINTENANCE PROGRAM

This chapter describes MCWD's measures and activities with regards to operations and maintenance, management of engineering data, capacity assurance, training programs, and communication programs.

5.1 ENGINEERING DATA MANAGEMENT

WDR Order No. 2022-0103-DWQ Attachment D states:

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

- An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing SWRCB and RWQCB 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.
- 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.

- 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 the 2022 SSS Order;
 - The Enrollee's Spill Emergency Response Plan (SERP) procedures and practice drills;
 - Skilled estimation of spill volume for field operators; and
 - Electronic CIWQS reporting procedures for staff submitting data.
- An inventory of sewer system equipment, including the identification of critical replacement and spare parts.

5.1.1 COMPLIANCE SUMMARY.

MCWD maintains a map of the sanitary sewer system.

CHAPTER FIVE

The Fresno Metropolitan Flood Control District owns and operates storm water facilities in the MCWD area. A map of these facilities is available at the following website:
<https://www.arcgis.com/apps/webappviewer/index.html?id=5ac65186b1794949a1fda62ca7734986>

5.1.2 COMPLIANCE DOCUMENTS.

Documents which support compliance of this section include the following:

- MCWD Sewer System Maps (**Appendix F**)

5.1.3 ROLES AND RESPONSIBILITIES.

The District's contract engineer is responsible for the collection and maintenance of MCWD's collection system maps as directed by the Board of Directors.

5.2 PREVENTATIVE OPERATION AND MAINTENANCE ACTIVITIES

The Order requires the SSMP to describe routine preventative operation and maintenance activities by staff and contractors; including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders.

The three Lift Stations owned by MCWD do not have an alarm system. Monitoring is reliant upon physical inspection.

5.2.1 COMPLIANCE SUMMARY.

MCWD has a preventative maintenance plan already in place. The following is a list of preventative maintenance tasks that shall be completed as stated:

- Open and inspect all sanitary sewer manholes (as specified on the "Malaga CWD Sewage System Checklist" in **Appendix H**)
- Inspect all sanitary sewer lift stations (as specified on the "Malaga CWD Sewage System Checklist" in **Appendix H**)
- Flush sanitary sewer pipelines crossing under State Route 99

The Malaga CWD Sewage System Checklist (**Appendix H**) shall be completed whenever an inspection is performed. If anything is discovered during the inspection, the time and date inspected as well as a description of what was found during the inspection shall be recorded in an inspection report (**Appendix H**) and filed with all other inspection reports at the MCWD Office.

CHAPTER FIVE

5.2.2 COMPLIANCE DOCUMENTS.

The documents supporting compliance with the requirements for this section include the following:

- Inspection Report Form (**Appendix H**)
- Malaga CWD Sewage System Checklist (**Appendix H**)
- O&M Manuals (Maintained at MCWD)

5.2.3 ROLES AND RESPONSIBILITIES.

The District Manager is responsible for identifying the various tasks required for proper inspection and maintenance above and beyond the list in section 5.2.1. The District Manager is also responsible for assigning work to the appropriate staff to complete the identified inspection and maintenance tasks. The field staff that actually performs the inspection or maintenance task is responsible for correctly documenting the work that was done.

5.3 REHABILITATION & REPLACEMENT

MCWD must develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and CCTV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans, plus a schedule for developing the funds needed for the capital improvement plan.

5.3.1 COMPLIANCE SUMMARY.

A description of the on-going inspection that will take place to identify structural deficiencies in the collection system is contained in Section 5.2.1. The MCWD Capital Facilities Plan includes a financial plan that properly funds the rehabilitation and replacement of infrastructure assets.

5.3.2 COMPLIANCE DOCUMENTS.

The documents supporting compliance with the requirements for this section include the following:

- Draft Capital Facilities Plan

Commented [MM4]: Included in the Appendix?

Commented [MT5R4]: I am not sure if we want to include or not. Leaning toward not.

5.3.3 ROLES AND RESPONSIBILITIES.

The District's contract engineer is responsible for updating the Capital Facilities Plan as directed by the Board of Directors.

5.4 Training Program

MCWD must provide training on a regular basis for staff in sanitary sewer system operations, maintenance, and require contractors to be appropriately trained.

5.4.1 COMPLIANCE SUMMARY.

MCWD's staff currently participates in the CWEA certification program for collection workers, Grades I through IV. MCWD requires all contractors to be appropriately trained. MCWD provides training to employees as needed.

5.4.2 COMPLIANCE DOCUMENTS.

There are no compliance documents for this section.

5.4.3 ROLES AND RESPONSIBILITIES.

The District Manager is responsible for maintaining and updating all MCWD employee training records for staff in collection systems management operations, maintenance, and SSO reporting and monitoring.

Commented [MM6]: Referred to as District Manager in previous sections.

5.5 Equipment & Replacement Parts

MCWD must provide equipment and replacement part inventories, including identification of critical replacement parts. An equipment inventory is included in **Appendix B**.

5.5.1 COMPLIANCE SUMMARY.

MCWD has a list of parts suppliers that they contact when they need spare parts. The facilities that the District maintains are limited to sewer pipelines, manholes and lift stations. Keeping an inventory of spare parts for these types of facilities would be both impractical and unnecessary.

5.5.2 COMPLIANCE DOCUMENTS.

There are no compliance documents for this section.

5.5.3 ROLES AND RESPONSIBILITIES.

The District Manager is responsible for acquiring equipment and replacement parts as necessary to properly maintain District facilities.

6 DESIGN AND PERFORMANCE PROVISIONS

This chapter references the design and construction standards & specifications for new sewer systems, pump stations, and other appurtenances, and for the rehabilitation and repair of existing sewer systems. Also included are the procedures and standards for the inspection and testing of these facilities.

WDR Order No. 2022-0103-DWQ Attachment D states:

The Plan must include the following items as appropriate and applicable to the Plan:

- 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 Element 8 (System Evaluation, Capacity Assurance and Capital Improvements) of this Plan, the procedures must include component-specific evaluation of the design criteria.
- Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.

6.1.1 COMPLIANCE SUMMARY.

Requirements for design, construction, and testing of new and existing (rehabilitated) facilities exist and are available at the MCWD District office.

6.1.2 COMPLIANCE DOCUMENTS.

The documents used for design and performance evaluations include the following:

- MCWD Standard Specifications for Public Works Improvements (**Appendix E**)

6.1.3 ROLES AND RESPONSIBILITIES.

Staff or Board members at MCWD may propose a change to the design and construction standards. The proposed change is to be submitted to the District Manager for review and a determination of action.

If the District Manager determines a change should be considered, the recommendation is forwarded to the District Engineer for evaluation and subsequent preparation of an update to the Standard Plans and Specifications. The recommended update would be submitted to the Board of Directors for approval at a regularly scheduled Board meeting.

6.2 PROCEDURES AND STANDARDS

Inspection and testing requirements for sanitary sewer system components are followed as described by the MCWD Standards and Specifications.

7 SPILL EMERGENCY RESPONSE PLAN

This chapter references the overflow emergency response plan that identifies measures to protect public health and the environment. The Order requires that the plan include the following:

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

7.1.1 COMPLIANCE SUMMARY.

MCWD has developed a spill emergency response plan. The spill emergency response plan complies with all the requirements listed above.

7.1.2 COMPLIANCE DOCUMENTS.

- A copy of the MCWD Sewer Spill Response Plan is included in **Appendix G**.

7.1.3 ROLES AND RESPONSIBILITIES.

The roles and responsibilities of each position are described in detail in the spill emergency response plan.

8 SEWER PIPE BLOCKAGE CONTROL PLAN

Malaga County Water District (MCWD) has evaluated its service area and determined that a FOG control program is needed. MCWD has prepared and implemented a FOG source control program to reduce the amount of FOG discharged to the sanitary sewer system. This plan includes the following as appropriate:

- a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG. MCWD requires all non-residential customers to obtain a non-residential wastewater discharge permit (NRWDP) from the District (Ordinance 2013-1). Chapter 6 of the Pretreatment Program (**Appendix M**) addresses FOG requirements within MCWD. Specific Requirements regarding FOG are included with each permit as appropriate. A sample template for the NRWDP is included in the Pretreatment Program;
- b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area;
- c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG;
- d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements. The Uniform Plumbing Code shall be the reference for sizing of interceptors;
- e) Authority to inspect grease producing facilities, enforcement authorities, and whether MCWD has sufficient staff to inspect and enforce the FOG ordinance;
- f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
- g) Development and implementation of source control measures for all sources of FOG discharges to the sanitary sewer system for each section identified in (f) above.

8.1.1 COMPLIANCE SUMMARY.

MCWD has developed a plan to distribute information about best management practices (BMP) regarding the prevention of FOG from entering into the sanitary sewer system. Chapter 6 of the Pretreatment Program describes the Fats Oils and Grease Control Program. Attachment G of the Pretreatment Program is the FSE-FOG Evaluation Form and Attachment H of the Pretreatment Program is the Brochure containing Best Management Practices for the District's FOG program. The list of BMPs will also be periodically included as an insert in bills that go out to all the users of the system.

CHAPTER EIGHT

All FOG generated within the sanitary sewer system service area is disposed of with the local waste hauler.

“Chapter 5: Use of Public Sewers,” of the MCWD Sewer Use Ordinance gives MCWD the legal authority to prohibit illicit discharges of FOG into the sanitary sewer system. The legal authority for MCWD to identify measures to prevent SSOs and blockages caused by FOG is achieved through the requirements set forth in “Chapter 5: Use of Public Sewers and Chapter 6: Permit Issuance” of Title 3 of the MCWD Sewer Use Ordinance.

Specific grease removal device installation and maintenance requirements are built into MCWD’s non-residential waste discharge permit process. Reporting requirements are defined as a part of MCWD’s non-residential waste discharge permit process.

The authority to inspect grease producing facilities is derived from Chapter 5: Use of Public Sewers of the Sewer Use Ordinance. Chapter 5: Use of Public Sewers and Chapter 8: Enforcement of the Sewer Use Ordinance, and Chapter 6 of the Pretreatment Ordinance give MCWD the authority to enforce the requirements set forth to prevent the discharge of FOG into the sanitary sewer system.

The cleaning schedule for sanitary sewer system sections that are subject to FOG blockages can be found in Chapter 5.2 (Operations and Maintenance chapter) of this SSMP.

Through normal review of the sanitary sewer system, the District will identify sections that are subject to FOG blockages and require users to install additional pretreatment facilities to help reduce the amount of FOG being discharged into the system.

The Sewer Use Ordinance and Pretreatment Program are included in the MCWD website.

8.1.2 COMPLIANCE DOCUMENTS.

- A copy of the MCWD Sewer Use Ordinance is included in **Appendix D**.
- A copy of the MCWD Pretreatment Ordinance, including FOG program and a template for a Non-residential Waste Discharge Permit is included in **Appendix M**.
- A List of Best Management Practices for Public Education is included in **Appendix I**.

8.1.3 ROLES AND RESPONSIBILITIES.

The District Manager is responsible for determining specific requirements for FOG control measures. The MCWD Board is responsible for enforcing the requirements of the MCWD Sewer Use Ordinance and the Non-Residential Waste Discharge Permit.

8.2 PROHIBITIONS

The following prohibitions shall apply to all Food Service Establishments (FSEs):

- 1) Introduction of any additives into an FSE’s wastewater system for the purpose of emulsifying FOG is prohibited, unless a specific written authorization from the Field Manager is obtained.
- 2) Disposal of waste cooking oil into drainage pipes is prohibited. All waste cooking oils shall be collected and stored properly in receptacles such as barrels or drums for recycling by the FSE.
- 3) Discharge of wastewater from dishwashers to any grease trap or grease interceptor is prohibited.
- 4) Discharge of wastewater with temperatures in excess of 140°F to any FOG control device, including grease traps and grease interceptors, is prohibited.
- 5) The use of biological additives for grease remediation or as a supplement to interceptor maintenance, without prior authorization from the Field Manager, is prohibited.
- 6) Discharge of wastes from toilets, urinals, wash basins, and other fixtures containing fecal materials to sewer lines intended for grease interceptor service is prohibited.
- 7) Discharge of any waste including FOG and solid materials removed from grease interceptors shall be waste hauled periodically as part of the operation and maintenance requirements.

8.3 RECORD-KEEPING AND REPORTING REQUIREMENTS

FSEs would be required to keep records and submit or make available for review, the following documents to MCWD, upon request:

- 1) A logbook of grease interceptor or grease trap cleaning and maintenance practices and BMPs implemented.
- 2) Copies of records and manifests of hauled waste FOG or hauled interceptor wastewater.
- 3) Periodic BMP Reports and Grease Interceptor Maintenance Reports as specified in the permit.
- 4) Any required self-monitoring reports or sampling data as specified in the permit.
- 5) Any other information deemed appropriate by the General Manager.

8.4 USE OF GREASE INTERCEPTOR DEPTH AS AN ACTION LEVEL FOR CONTROLLING FOG PASS-THROUGH

For FSEs with grease interceptors, an alternative indicator that can be used to evaluate compliance with the required pretreatment equipment maintenance is by measuring the level of solids and FOG accumulation in the grease interceptors. Excessive levels of FOG and solids accumulation in grease interceptors diminishes removal efficiency, eventually resulting in FOG passing through the equipment and discharged to the sewer. Therefore, establishing an interceptor liquid depth action level will provide another method for controlling FOG discharges. Based on a minimum allowable liquid level established as a performance standard, compliance monitoring and evaluation may be conducted by measuring the sludge height using a sludge judge or an electronic height measuring device to obtain the solid-free liquid level. It is suggested to establish the sludge height performance standard based on the 25% rule which requires that grease interceptors be pumped-in-full when the total accumulation of surface FOG (including floating solids) and settled solids reaches 25% of the grease interceptor's overall liquid depth. This provides an alternative method for controlling the amount of FOG discharge other than actual measurements of effluent concentration. With the use of an interceptor liquid depth action level, compliance can be monitored and enforcement actions, which may include escalation of interceptor maintenance frequency, may be imposed.

8.5 DETERMINING INTERCEPTOR CLEANING FREQUENCY

The cleaning frequency should depend upon the FSEs' type of operation and is, therefore, expected to vary. The frequency for cleaning interceptors is affected by a lot of factors and varies from FSE to FSE. Although frequent grease interceptor cleaning is desirable, a balance between cost and benefit should be maintained. Because this is an important issue for FSEs due to the cost involved, as well as for MCWD as it affects the success of the FOG control program, it is very important to establish a cleaning frequency requirement that is practical and effective. Therefore, this issue must be addressed appropriately. The use of a "one size fits all" cleaning frequency may seem very easy to manage from the regulatory standpoint, but can be either impractical and/or cost prohibitive for some FSEs or too lax for other FSEs. Specifying a cleaning frequency for each FSE that reflects a representative time when cleaning is actually needed is ideal but the determination for establishing frequency may be more involved. The following procedure will be used for establishing required cleaning frequency:

- 1) Grease interceptors should be pumped out (pumped-in-full) and cleaned at a frequency such that the combined FOG and solids accumulation does not exceed 25% of the total liquid depth of the grease interceptor. This is to ensure that the minimum hydraulic retention time and required available volume is maintained to effectively intercept and retain FOG discharged to the sewer system.

- 2) Grease interceptors should be pumped out and cleaned quarterly when the frequency described in (1) has not been established. This standard default cleaning frequency was established based on the most common or typical frequency found to be effective for most FSEs. This frequency is used only for the purpose of establishing a default cleaning frequency initially but will be changed accordingly to reflect a more representative frequency based on actual data. The maintenance frequency shall be adjusted when sufficient data have been obtained to establish an average frequency based on the requirements described in (1) and guidelines in the FOG Control Policies. MCWD may change the maintenance frequency at any time to reflect changes in actual operating conditions in accordance with the FOG Control Policies. Based on the actual generation of FOG from the FSE, the maintenance frequency may increase or decrease.
- 3) FSEs may submit a request to change the maintenance frequency at any time. The FSE has the burden of responsibility to demonstrate that the requested change in frequency reflects actual operating conditions based on the average FOG accumulation over time and meets the requirements described in (1), and that it is in full compliance with the conditions of its permit and the Ordinance. Upon determination by the General Manager that requested revision is justified, the permit will be revised accordingly to reflect the change in maintenance frequency.
- 4) All FSEs with a grease interceptor will be required to maintain their grease interceptor at least every 6 months. Routine inspection to monitor liquid depth to verify the FSE's ability to maintain liquid depth above the action level will serve as a check whether cleaning frequencies previously established are still applicable or need to be re-adjusted.

9 SYSTEM EVALUATION, CAPACITY ASSURANCE AND CAPITAL IMPROVEMENTS

MCWD will fulfill the requirements listed in paragraphs a-d below and as appropriate adopt updates to the capital improvements plan. The updated CIP will include the evaluation of key sanitary sewer system elements for dry weather peak flow conditions. The order requires that the plan include the following:

- a) **Evaluation:** Identify actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events;
- b) **Design Criteria:** Where design criteria do not exist or are deficient, undertake the evaluation identified in paragraph a to establish appropriate design criteria; and
- c) **Capacity Enhancement Measures:** Identify the steps needed to establish short- and long-term capital improvements to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. This may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. MCWD shall prepare an implementation schedule and shall identify sources of funding for any capital improvements needed.
- d) **Schedule:** MCWD shall develop a schedule of completion dates for all portions of the capital improvements developed in paragraphs a through c above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14 of SWRCB Order No. 2022-0103-DWQ.

9.1 CAPITAL IMPROVEMENT PLAN

The annual operating budget for the sewer system is \$1,669,142. The capital improvement budget is \$2,630 as directed by the MCWD Board of Directors.

9.1.1 COMPLIANCE SUMMARY.

MCWD has a draft CIP that includes the following:

Evaluation: The portions of the sanitary sewer collection system that could experience or contribute to an SSO discharge caused by hydraulic deficiency have been identified in the CIP. Included in the evaluation are estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions that could potentially result in an overflow event, estimates of the capacity of key system components,

hydraulic deficiencies (including components of the system with limiting capacity), and the major sources that contribute to the peak flows associated with overflow events.

Design Criteria: MCWD has established design criteria to undertake the evaluation described above.

Capacity Enhancement Measures: MCWD has established a short- and long-term CIP to address identified sewer system improvements. The CIP includes project cost estimates and project prioritization. Alternatives analysis, implementation schedules, and sources of funding are identified as new hydraulic deficiencies are discovered.

Schedule: The CIP is updated by the District's engineer as directed by the Board of Directors. The updates describe any significant changes in proposed actions and/or implementation schedules. MCWD has design standards and guidelines that it enforces to ensure that the sanitary sewer system has adequate capacity at all times. The CIP allows MCWD to identify existing facilities that need to be upgraded to ensure adequate capacity throughout the system.

MCWD is not currently experiencing capacity-related problems. Indications of possible capacity problems identified by District staff are brought to the attention of the General Manager and the District's engineer for further evaluation.

9.1.2 COMPLIANCE DOCUMENTS.

- Summary of identified Capital Facilities Improvements

Commented [MM7]: Where?

9.1.3 ROLES AND RESPONSIBILITIES.

Development of the CIP is the responsibility of the District Engineer as directed by the MCWD Board of Directors.

Commented [MT8R7]: I think an action item will be to prepare such a list as associated with sewer improvements

10 MONITORING, MEASUREMENT, AND PROGRAM MODIFICATIONS

The Order requires Malaga County Water District (MCWD) to perform the following tasks:

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

10.1 COMPLIANCE SUMMARY

MCWD reports and keeps statistics on all SSOs. Once a year, SSO records are reviewed to determine if improvements are needed. Areas of the Sanitary Sewer System that are susceptible to blockages because of hydraulic deficiencies are identified. Projects to correct the hydraulic deficiencies are given priority in the CIP over other projects.

Once a year, MCWD monitors the implementation of all SSMP elements to determine the effectiveness of each SSMP element. The SSMP is then modified to improve its effectiveness.

10.2 COMPLIANCE DOCUMENTS

- MCWD Sewer System Management Plan
- Sewer Spill Response Plan, Attachment A, List of Sanitary Sewer Overflows
- Sewer Spill Response Plan, Attachment C, Overflow Report Form
- Regional Water Quality Control Board website: <http://ciwqs.waterboards.ca.gov/>

10.3 ROLES AND RESPONSIBILITIES

The District Manager is responsible for completing all SSO monitoring, reporting, record keeping, and updating of program elements.

11 INTERNAL AUDITS

As part of the SSMP, MCWD shall conduct periodic internal audits, as appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every three years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and MCWD's compliance with the SSMP requirements identified in Section 5.4 of the Order, also as described in Attachments D and E1 of SWRCB Order No. 2022-0103-DWQ, including identification of any deficiencies in the SSMP and steps to correct them.

11.1 COMPLIANCE SUMMARY

MCWD will conduct periodic internal audits at least every three years. The effectiveness of the SSMP will be evaluated to identify any deficiencies and steps to correct them.

11.2 COMPLIANCE DOCUMENTS

- MCWD Sewer System Management Plan Internal Audit Summary is included in **Appendix J**.

11.3 ROLES AND RESPONSIBILITIES

The Enrollee will 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 shall 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 (LRO) 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 the 2022 SSS 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.

CHAPTER ELEVEN

The Enrollee will submit an 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.

11.4 INTERNAL AUDITS PLAN

The District Manager or their designee is responsible for assuring the SSMP Internal Audit is conducted and completed prior to the first SSMP Internal Audit date of January 15, 2026 and continuously on a three-year interval following this date.

Internal audits must be conducted with the participation of the MCWD Staff as outlined in the SSMP Internal Audit procedure below.

When conducting the SSMP Audit, the District Manager must lead the evaluation of the effectiveness of each SSMP Element, evaluate the effectiveness of MCWD spill response, and ensure the SSMP Audit Report is prepared and submitted electronically to the SWRCB CIWQS database six months after completion of the audit or by July 1 of the following year of the audit.

Table 11-1: Internal Audit Schedule, Team, and Findings – Years 2013 – 2033

Internal Audit Schedule, Team, and Findings – Years 2013 – 2033			
SSMP Audit Date	Report Due Date	Internal Audit Team Names	Summary of Audit Findings and Corrective Actions
1/15/2026	7/1/2026		
1/15/2029	7/1/2029		
1/15/2032	7/1/2032		
1/15/2035	7/1/2035		

The SSMP is a living document, and due to the length of time between internal audits, the District Manager should schedule annual reviews and revisions to specific SSMP Elements and associated supporting documents as appropriate. These reviews and revisions, documented in the Revision Record supporting each Element, will ensure current operational practices and procedures are reflected in the SSMP, and assist in the event of an inspection by the SWRCB, RWQCB, and/or USEPA.

11.5 SSMP INTERNAL AUDIT PROCEDURE

The SSMP Internal Audit is completed using the following procedure:

1. The SSMP Audit team must convene in January prior to the audit due date (see Table 11-1) and the team must include utility operations staff who operate and maintain the sewer lines, lift stations and treatment facilities.
2. The SSMP Audit team’s first task is to gather Plan documents using the SSMP Data & Records Review List, which is provided in **Appendix J**.
3. Evaluate the effectiveness of the MCWD SSMP and compliance with each 2022 SSS Order requirement using the ranking methodology outlined below:

Table 11-2: SSMP Internal Audit Ranking Criteria

SSMP Internal Audit Ranking Criteria	
Ranking	Basis of Ranking
Full Compliance	All Element requirements are satisfied.
Substantial Compliance	Majority of Element requirements are met.
Partial Compliance	Half of the Element requirements are met.
Marginal Compliance	Less than half of Element requirements are met.
Out of Compliance	None of the Element requirements are met.

4. Prepare the SSMP Program Audit Report, documenting the interviews and review of documentation supporting the implementation of each SSMP Element, and attach all documents reviewed (or include an example of a document and name location where remainder of documents can be found) and used as evidence of compliance with the 2022 SSS Order. The Audit Report additionally must contain the following information:
 - a. Findings and recommended corrective actions by Element.
 - b. A statement that sewer system operator(s) input on the audit findings has been considered; and
 - c. A proposed schedule for the MCWD to address the identified deficiencies.
5. The SSMP Program Audit Report must be signed and uploaded to CIWQS by a person designated as described in the 2022 SSS Order, Section 5.9 and as outlined in Table 11-1 above.

2022 SSS Order Section 5.9:

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

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

12 COMMUNICATION PROGRAM

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

Communicating the objectives of the Plan and the importance of sanitary sewer system management practices to the public and specific stakeholders is essential. An informed public can assist and support MCWD by reducing customer caused blockages, which will potentially decrease sewer spills.

WDR Order No. 2022-0103-DWQ Attachment D states:

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.

12.1 COMPLIANCE SUMMARY

MCWD will communicate on a regular basis with interested parties on the implementation and performance of this SSMP. The communication program allows interested parties to provide input as the program is developed and implemented. MCWD holds public board meetings to allow input from the public and other interested parties on the development and implementation of the SSMP. The development of the SSMP has been noticed in the board meetings. The County of Fresno, Fresno Irrigation District, Fresno Metropolitan Flood Control District and the public are encouraged to participate in the development of the SSMP and provide input as the program is developed and implemented. The outcome of all audits of the SSMP will be presented at the board meetings, which are open to the public.

12.2 COMPLIANCE DOCUMENTS

- Letter informing Fresno County, Fresno Irrigation District and Fresno Metropolitan Flood Control District of the development and implementation of the SSMP

Commented [MM9]: Where? Include in the appendix?

Commented [MT10R9]: I view them as separate, but we could include in an appendix. I have old letters that we can use to prepare updated letters. I think we are not incorporating the letters or asking the agencies to weigh in.

12.3 ROLES AND RESPONSIBILITIES

MCWD will continue with its commitment to communicate regularly with and allow input from interested parties on the development, implementation, and performance of its SSMP.

12.4 COMMUNICATION PROGRAM

The purpose of the communication program is to educate stakeholders on the effectiveness, importance and implementation of having the SSMP. The following are activities that the MCWD may place into practice to increase awareness and education about the importance of having a properly constructed, maintained, and operated collection system.

Table 12-1: Communication Program Overview

Communication Program Overview						
Activity	Frequency	Stakeholders	Year Completed			
			2025	2026	2027	2028
Malaga County Water District website	Year-Round	All	X			

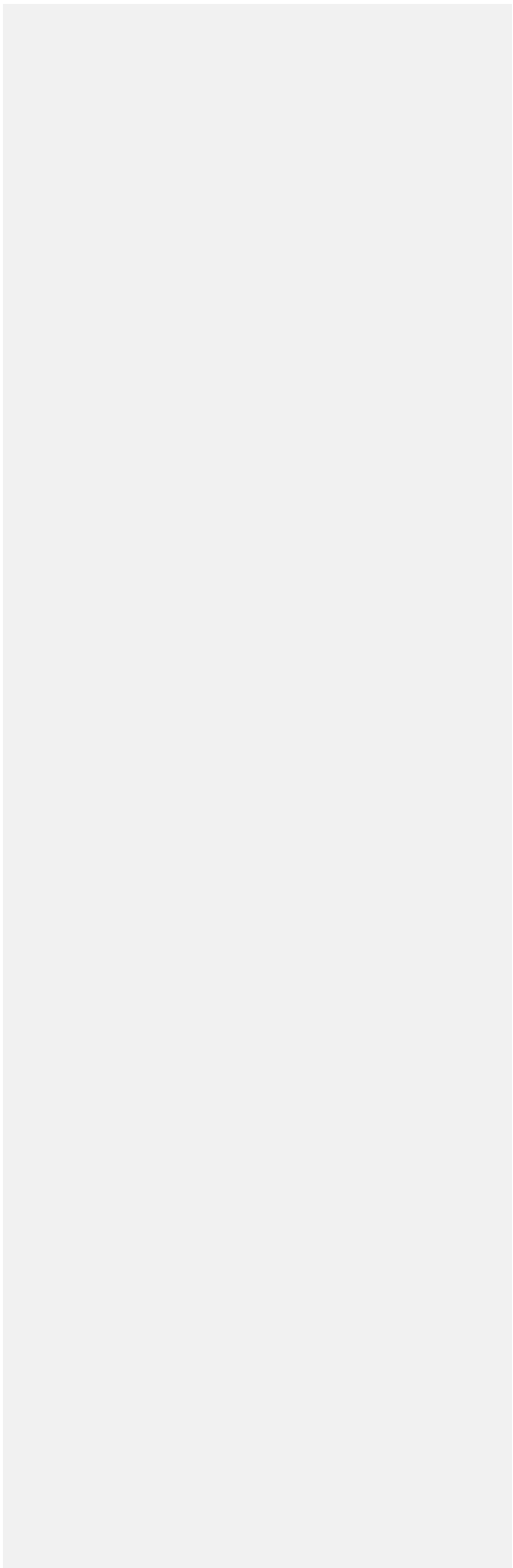
12.5 COMMUNICATION PROGRAM DETAILS

12.5.1 MCWD WEBSITE

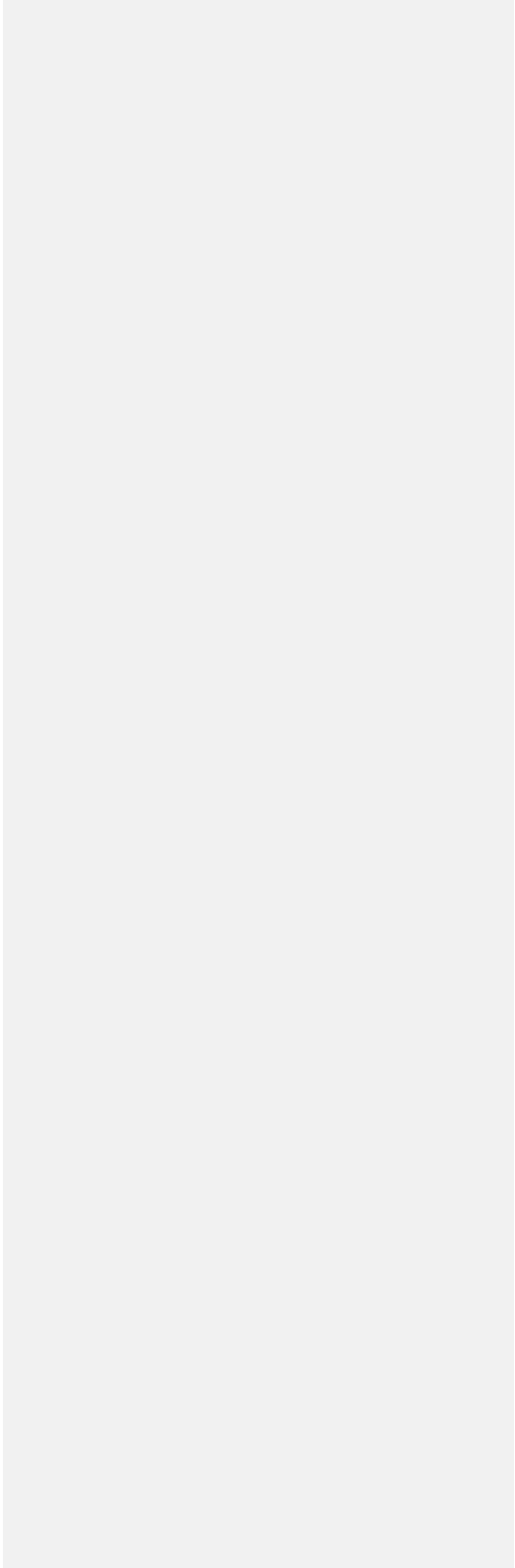
Information posted on the MCWD website will include links to the SSMP.
<https://www.malagacwd.org/>

Appendix A – SWRCB Order No. WQ 2022-0103-DWQ (includes Monitoring Program)

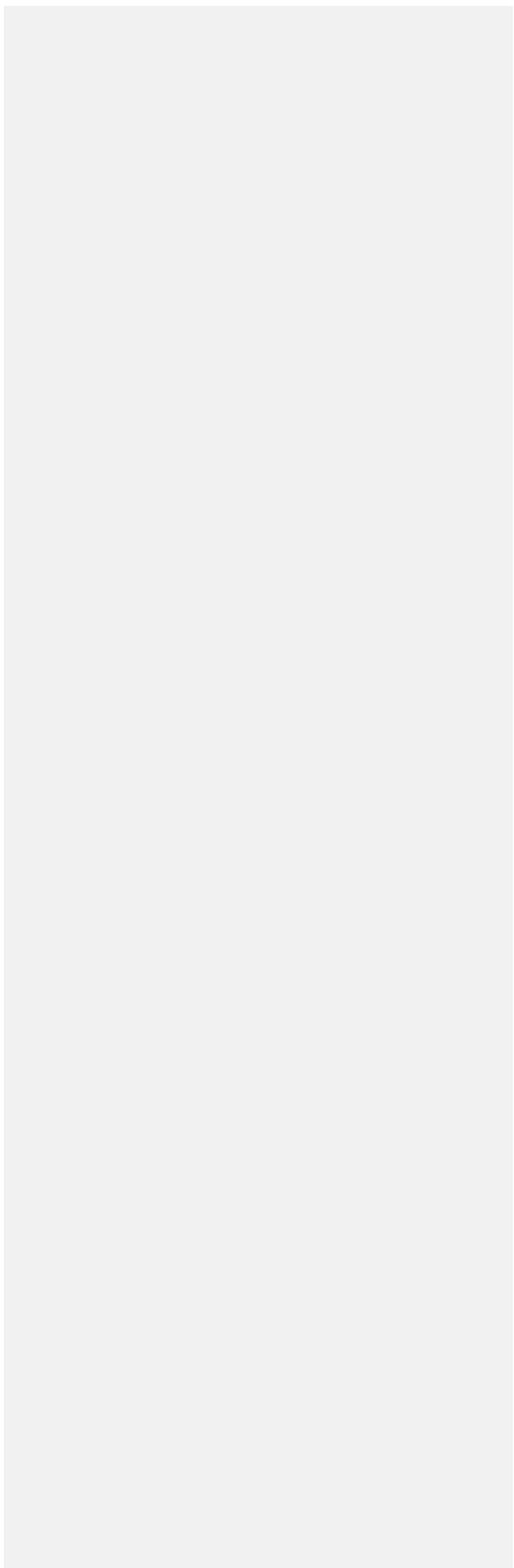
Appendix B – Equipment Inventory



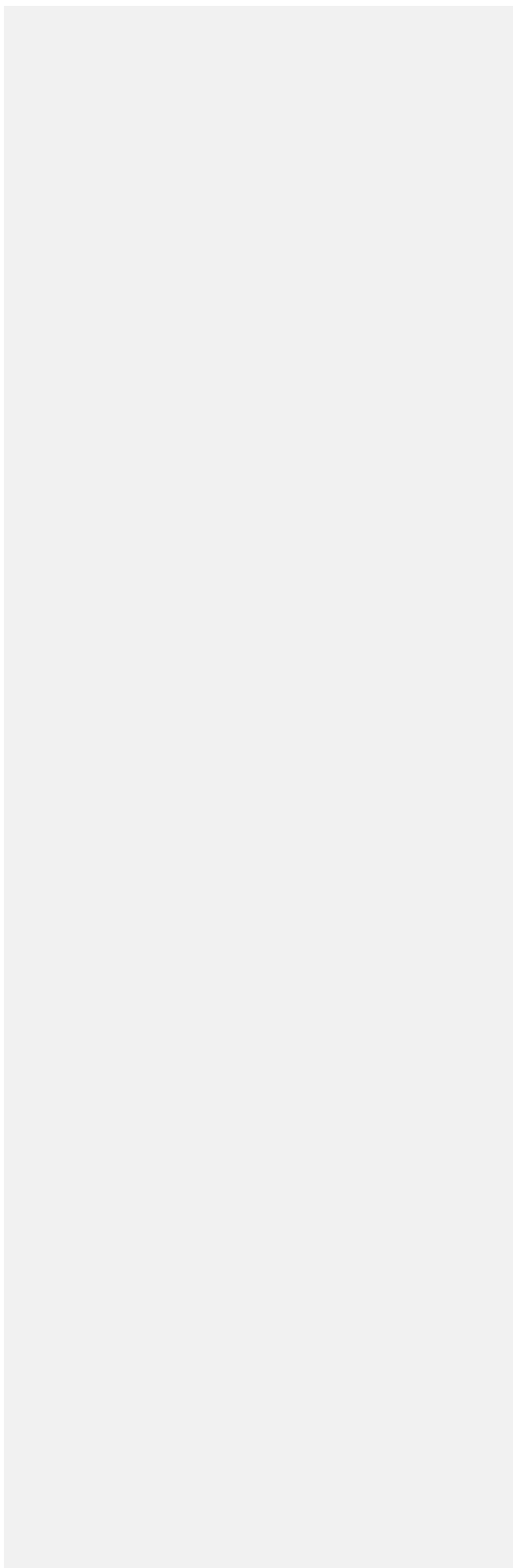
Appendix C – MCWD Organization Chart



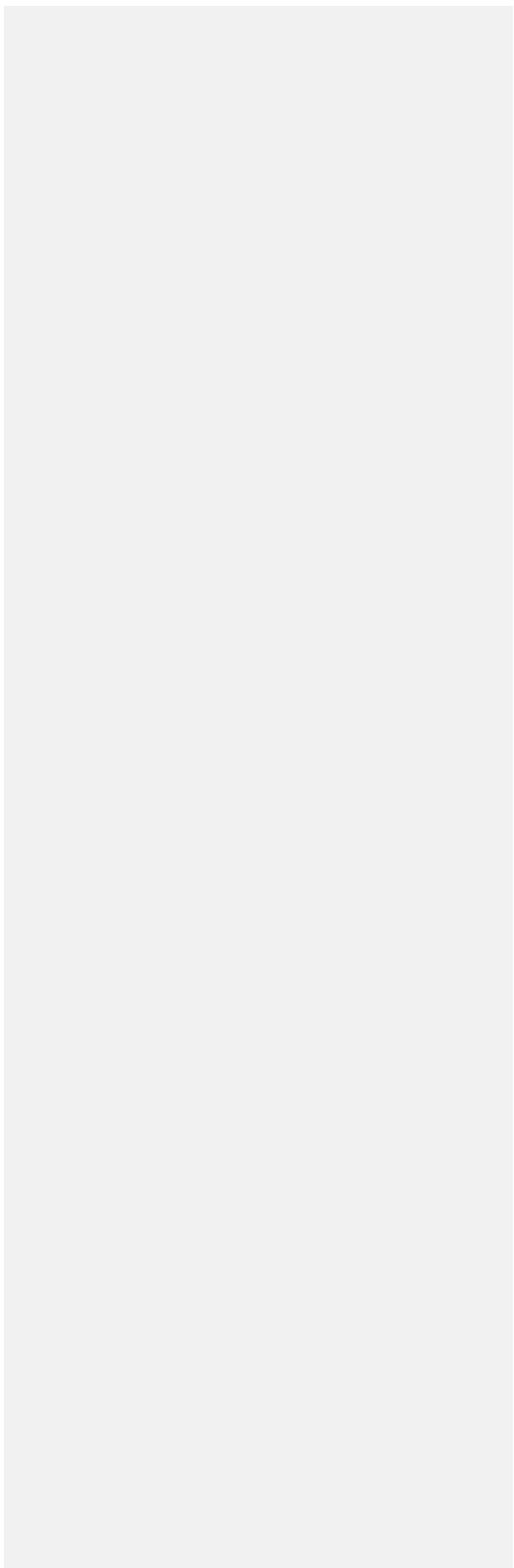
Appendix D - MCWD Sewer Use Ordinance



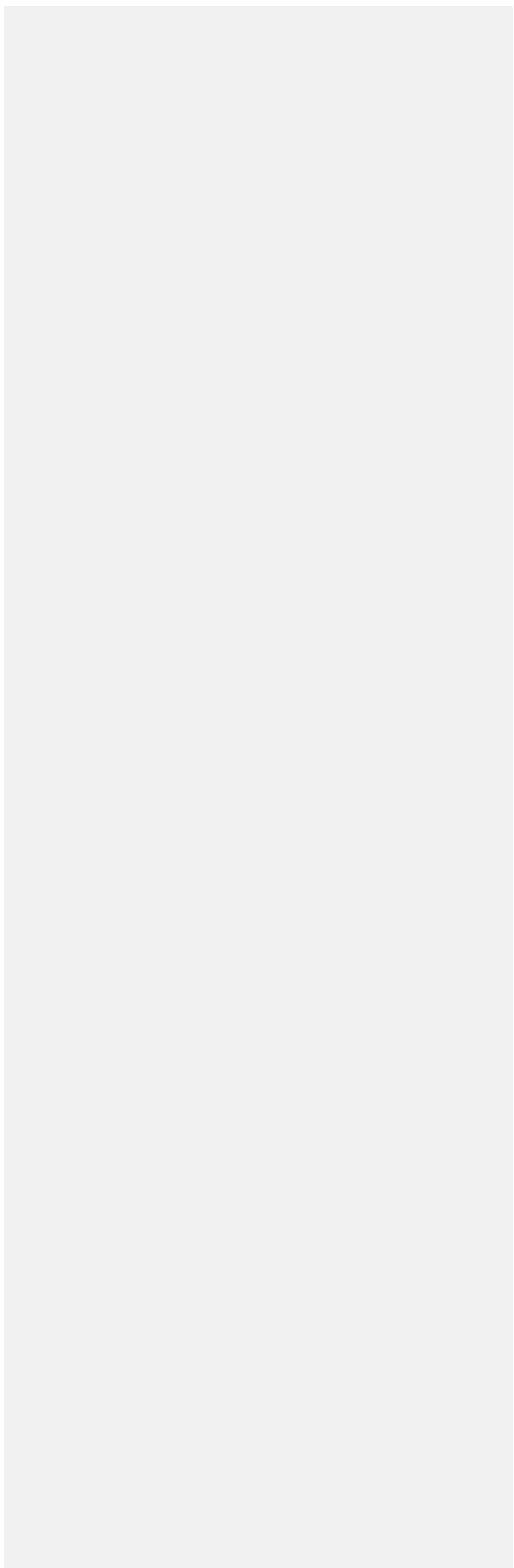
Appendix E – MCWD Standard Specifications for Public Works



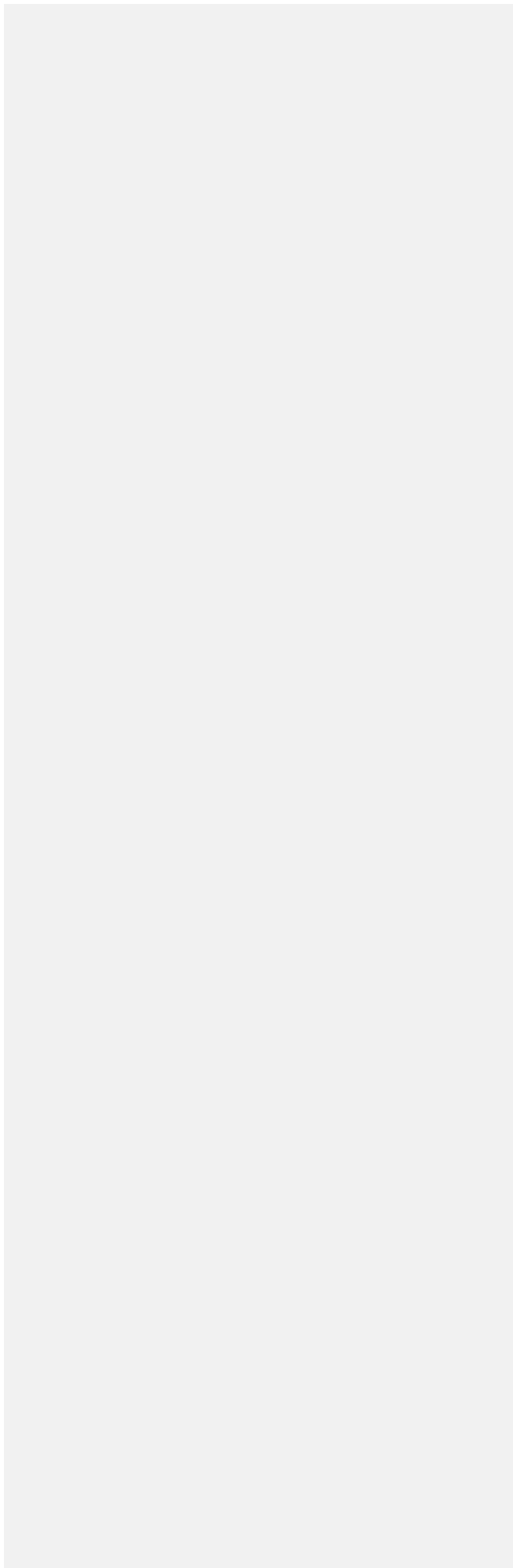
Appendix F – MCWD Sewer System Maps



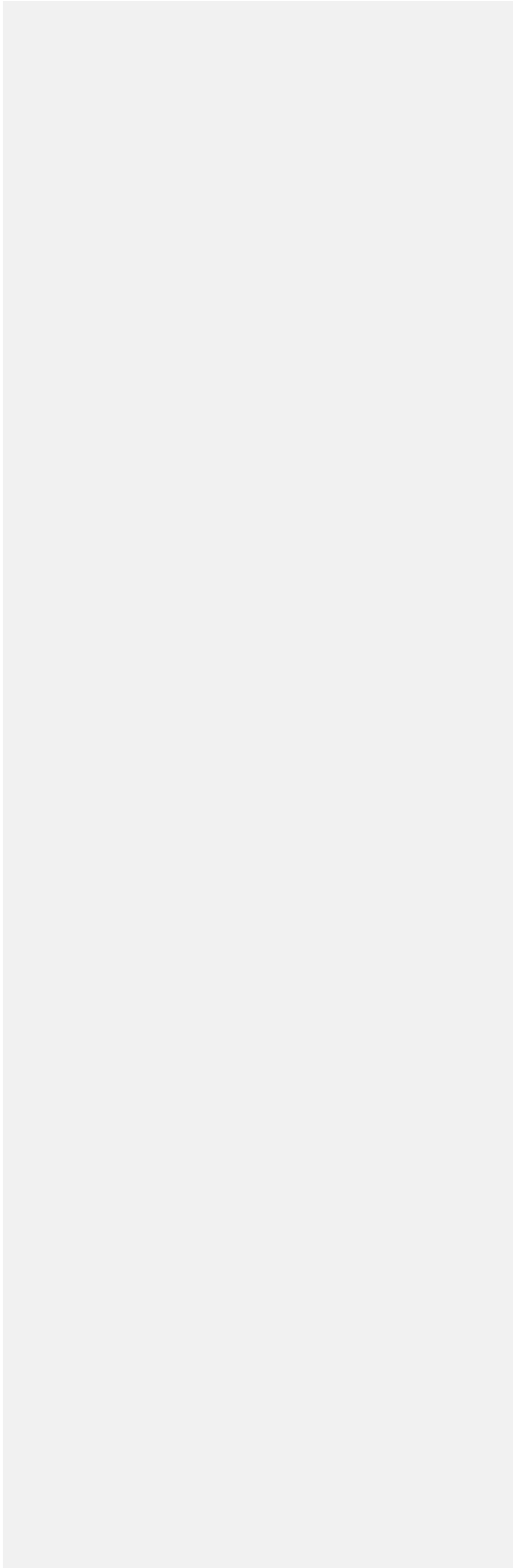
Appendix G – MCWD Sewer Spill Response Plan



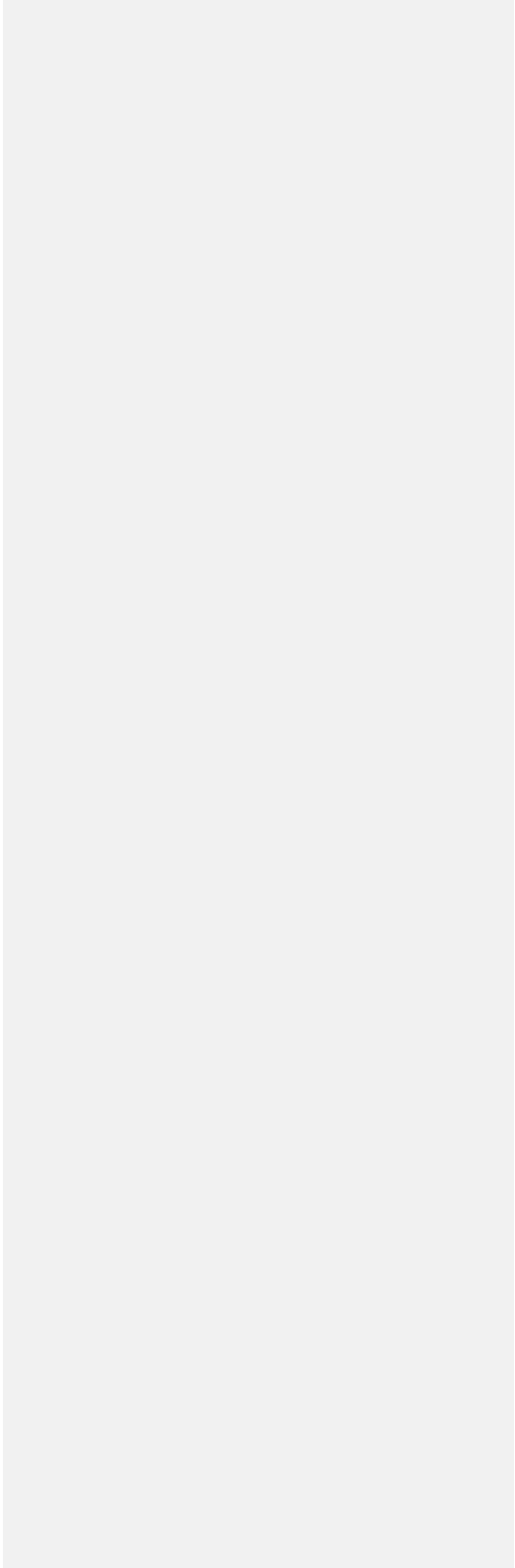
Appendix H -MCWD Inspection Report Form Sewage System Checklist



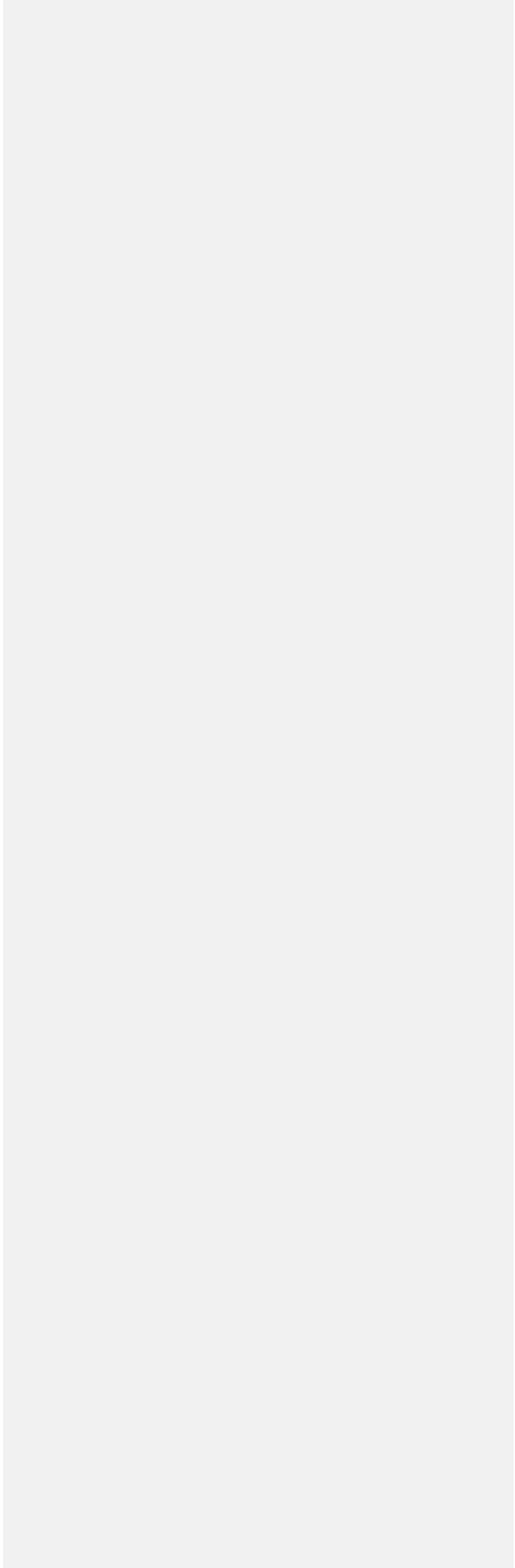
Appendix I - MCWD Best Management Practices



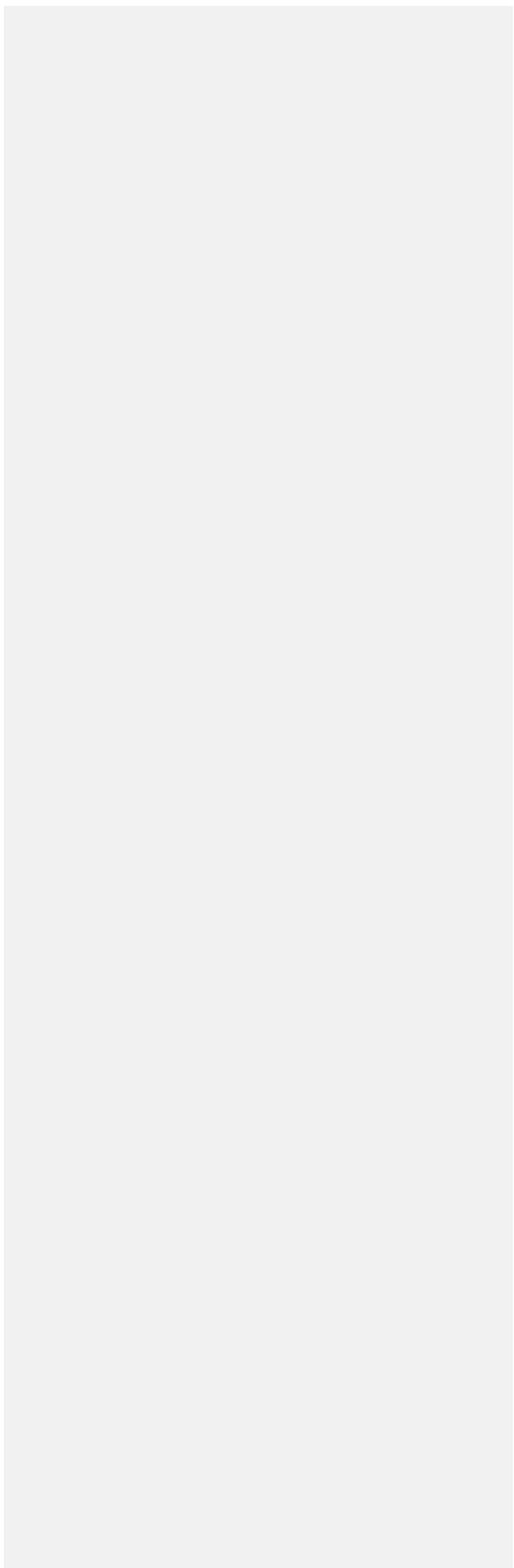
Appendix J - MCWD SSMP Internal Audit Summary



Appendix K - MCWD Pipe Blockage Response Plan



Appendix L - MCWD Notice of Applicability



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Appendix M - MCWD Pretreatment Ordinance

