



City Council Agenda Item

City Council Meeting Date: November 1, 2022

TO: Dean Albro, City Manager

FROM: Dong Hyun Chon, Ph.D., P.E. Wastewater Superintendent
d_chon@ci.lompoc.ca.us

SUBJECT: Adoption of Resolution No. 6551(22) Approving the Revision and Update of the Sewer System Management Plan as Prescribed by the State Water Resources Control Board Order No. 2006-0003-DWQ Adopted May 2, 2006, and Amended by Order No. WQ 2013-0058-EXEC Adopted August 6, 2013

Recommendation:

Staff recommends the City Council adopt Resolution No. 6551(22) (Attachment 1) approving the Sewer System Management Plan (SSMP) (Exhibit A to Attachment 1) and directing staff to complete the re-certification process.

Background:

The City was required by the State Water Resources Control Board (Water Board) Order No. 2006-0003-DWQ¹ (2006 Order) to implement a system-specific SSMP. The SSMP was prepared, approved by the City Council on July 21, 2009, and subsequently certified by staff to the Water Board. Effective September 9, 2013, Water Board Order No. WQ-2013-0058-EXEC² (2013 Order) mandated a new Monitoring and Reporting Program for all SSMPs. The 2013 Order was incorporated into the City's SSMP, approved by the City Council on October 7, 2014, and re-certified by staff to the Water Board.

In accordance with section D.14 of the 2006 Order, when significant updates to the SSMP are made, re-certification by the Enrollee governing board is required. The same Order states "The SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification by the governing board of the Enrollee is required in accordance with D.14 when significant updates to the SSMP are made."

An important directive of the 2006 Order was to place a requirement on sewage collection agencies to undertake the initial preparation of an SSMP that describes their ability to safely and effectively manage the delivery of wastewater/sewage collected from their

¹ Attachment 2.

² Attachment 3.

users to where it enters a treatment plant. Regional water boards are responsible for enforcing the 2006 Order and can impose either informal or formal enforcement in response to sewage spills.

The City's Wastewater Collection Division within the Utilities Department began preparation of its initial SSMP in August 2007. The SSMP covered the nearly 111 miles of the City's sanitary sewer system's collection pipes and the four pump stations it operated at that time. In addition to the City's system, two satellite agencies, the Vandenberg Village Community Service District and the Vandenberg Space Force Base, also convey wastewater/sewage to the City of Lompoc Regional Wastewater Reclamation Plant. Those agencies are referenced in the SSMP to satisfy requirements of the Water Board. Both are responsible for developing their own SSMPs, as well.

The City's initial SSMP was approved by the City Council on July 21, 2009, and was last revised and approved on October 7, 2014. The 2014 revision included new requirements that were added in September 2013 when the Water Board mandated a new Monitoring and Reporting Program under its 2013 Order. To meet those new requirements, mainly addressing sanitary sewer system spills/overflows, the 2014 SSMP incorporated many existing programs as well as added new documents to satisfy the 2013 requirements for certain individual elements of the SSMP.

Discussion:

Since the 2016 re-certification of the City's SSMP, older material has been updated and new additional material has been developed to meet current requirements as defined in the 2006 and 2013 Orders and to reflect current City procedures.

The eleven mandatory elements prescribed in the Orders are:

1. Goals,
2. Organization,
3. Legal Authority,
4. Operation and Maintenance Program,
5. Design and Performance Provisions,
6. Overflow Emergency Response Plan,
7. Fats, Oils, and Grease (FOG) Control Program,
8. System Evaluation and Capacity Assurance Plan,
9. Monitoring, Measurement and Program Modifications,
10. SSMP Program Audits, and
11. Communication Program.

Of those elements, numbers six, Overflow Emergency Response Plan, and seven, Fats, Oils, and Grease (FOG) Control Program, are the most important because they present significant negative consequences for the City that could result from non-compliance, including enforcement actions.

The main goals for updating, monitoring, and complying with SSMP requirements are:

- (a) To maintain relevant information that can be used to establish and prioritize appropriate SSMP activities;
- (b) To monitor the implementation and, when appropriate, measure the effectiveness of each element of the SSMP;
- (c) To assess the success of the preventative maintenance program;
- (d) To update the program elements, as appropriate, based upon monitoring or performance evaluations; and
- (e) To identify and address Sewer System Overflow (SSO) trends, including frequencies, locations and volumes.

Specifically, the SSMP must be updated every five years and must include any program changes. Re-certification is also required. Re-certification consists of approval by the City Council, followed by a City's authorized representative performing the certification process by completing an online database questionnaire and submitting the updated SSMP to the Water Board. Once approved and certified, the SSMP will be made available on the City's website. The City is also required to conduct periodic internal audits at a minimum of every two years. The focus of the audits is to evaluate the effectiveness of the SSMP, proof of compliance, and identification of any deficiencies and the steps taken to correct them. Audit reports must be completed and kept on file by the wastewater/sewer collection agency and must be provided to the Water Board if requested.

The City's updated SSMP was due to the Water Board by October 2019. Unfortunately, that deadline was missed due to staff turnovers in the Wastewater Division of the Utilities Department resulting in a 62% vacancy of key personnel over the past 60 months. Now that key staff members are in place, the audit and revisions to the SSMP have been completed, and re-certification will take place as soon as the City Council approves the updated SSMP.

Fiscal Impact:

Minimal fiscal impact on the City is expected by adopting the attached resolution, which revises and updates the SSMP. Future SSMPs as required at five year intervals and prepared by either staff or consultants are expected to cost on the order of \$20,000. That cost is included in the current adopted Biennial Budget FYs 2021-23 and is expected to be included in future budget cycles. Internal performance audits, required every two years, will be conducted by staff at a cost of approximately \$2,500. Failing to maintain a current SSMP however, could result in additional costs if monetary enforcement measures are imposed by the Water Board.

Negligible to no financial impact should occur for residents; however, costs of conducting on-site pretreatment practices may increase for certain businesses, particularly if such measures are not currently being implemented.

Conclusion:

The SSMP conforms to the requirements of the Water Board and provides the City Council, regulators, staff, and the public with information about the construction, maintenance, and safe operation of the collection system portion of the City's sewer system. The SSMP, if approved by the City Council, will bring the City into compliance with the 2006 and 2013 Orders. Once approved and re-certified, the SSMP will be made available on the City's website.

Respectfully submitted,

Dong Hyun Chon, Ph.D., P.E. Wastewater Superintendent

APPROVED FOR SUBMITTAL TO THE CITY MANAGER:

Shaun Ryan, Acting Utility Director

APPROVED FOR SUBMITTAL TO THE CITY COUNCIL:

Dean Albro, City Manager

- Attachments: 1) Resolution No. 6551(22)
2) State Water Resources Control Board Order No. 2006-0003-DWQ
3) State Water Resources Control Board Order No. WQ 2013-0058-EXEC