

ELEMENT 10 - SEWER SYSTEM MANAGEMENT PLAN PROGRAM AUDITS

SSMP Audits are required to identify and correct deficiencies in the most current revision of the District's SSMP and provide a schedule to correct identified deficiencies. This SSMP Element outlines the audit process and identifies District Staff responsible for conducting or participating in SSMP Audits and generating the required SSMP Audit Report.

10.1 Regulatory Requirements

WDR Order No. 2006-0003-DWQ Section D.13(x) requires:

As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements identified in this subsection (D.13), including identification of any deficiencies in the SSMP and steps to correct them.

10.2 SSMP Program Audits [WDR D.13(x)]

The Associate Civil Engineer or their designee is responsible for assuring the SSMP Audit is conducted and complete prior to the August 2, 2015 deadline and continuously on a two year interval following this date. Audits should be conducted with cooperation of the Maintenance and Utilities Superintendent and other applicable District Staff. When conducting the SSMP Audit, District Staff must evaluate the effectiveness of each SSMP Element. A comprehensive, effective review of the District's SSMP must be documented in a SSMP Audit Report.

10.2.1 Summary of Procedure:

1. Gather appropriate documents using the SSMP Data & Records Request, which is provided in Appendix 10A.
2. Write Audit Report and attach all documents reviewed and used as evidence of compliance with the WDR. Create a plan and schedule for revisions to the SSMP based on changes in operational strategies or deficiencies found in the SSMP.
3. Evaluate the effectiveness of the District's SSMP and compliance with each WDR requirement using the ranking methodology outlined in Table 10-1.

Table 10-1: SSMP Audit Ranking Criteria

Ranking	Ranking Basis
In Compliance	All requirements specified in the element are met.
Substantial Compliance	The majority of requirements in the element are met.
Partial Compliance	Half of the requirements in the element are met.
Marginal Compliance	Less than half of the requirements in the element are met.
Out of Compliance	None of the requirements in the element are met.

The first SSMP Audit Report must be signed and certified by a person designated as described in WDR Section J.1.(i) before August 2, 2015. WDR Section J states:

All applications, reports, or information shall be signed and certified as follows:

- (i) All reports required by this Order and other information required by the State or Regional Water Board shall be signed and certified by a person designated, for a municipality, state, federal or other public agency, as either a principal executive officer or ranking elected official, or by a duly authorized representative of that person, as described in paragraph (ii) of this provision. (For purposes of electronic reporting, an electronic signature and accompanying certification, which is in compliance with the Online SSO database procedures, meet this certification requirement.)
- (ii) An individual is a duly authorized representative only if:
 - (a) The authorization is made in writing by a person described in paragraph (i) of this provision; and
 - (b) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity.

The SSMP Audit Report must be hand signed and certified using the language provided below:

“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.”

Subsequent SSMP Audits must be conducted continuously on a two year interval following the schedule outlined in Table 10-2 below.

Table 10-2: SSMP Audit Schedule

SSMP Audit Due Date	Date District SSMP Audit Completed
1. August 2, 2011	November 2011
2. August 2, 2013	May 16, 2013
3. August 2, 2015	
4. August 2, 2017	
5. August 2, 2019	

To assist in the audit process, the District should consider quarterly or semiannual reviews and revisions to specific SSMP Elements and associated supporting documents. These reviews and revisions will help ensure current operational practices and procedures are reflected in the SSMP and documentation of these activities is readily available during an audit by the Regional Water Quality Control Board, State Water Resources Control Board, or United States Environmental Protection Agency.

SSMP Audit Reports must be kept on file with the SSMP and available to regulators and the public upon request. The first two District SSMP Audit Reports, which are dated November 2011 and May 16, 2013, are included in Appendix 10B.