

# Compliance with the Reissued Sanitary Sewer System WDR Beyond June 5, 2023



James Fischer P.E.

Fischer Compliance LLC Retired State Water Board NPDES Inspector

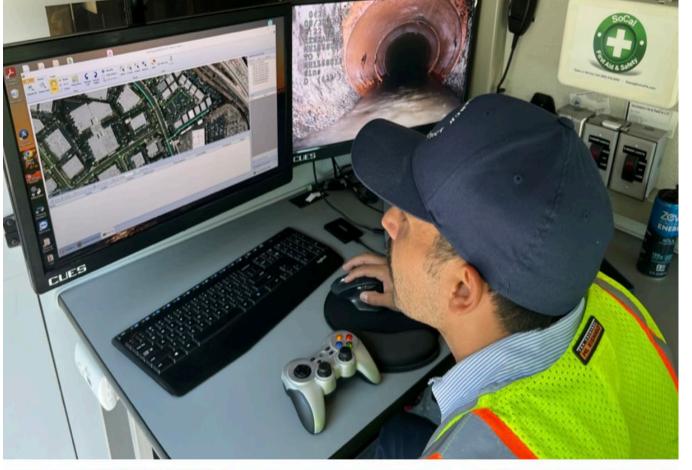


**Rich Cunningham** 

Cunningham Consulting Retired Manager















# **LIVE POLLING!**







WHERE IS YOUR AGENCY?







"Implement" (appears 52 times)

"Enforce" (appears 30 times)

"Shall". (appears 123 times)

#### **Permit Expectations**

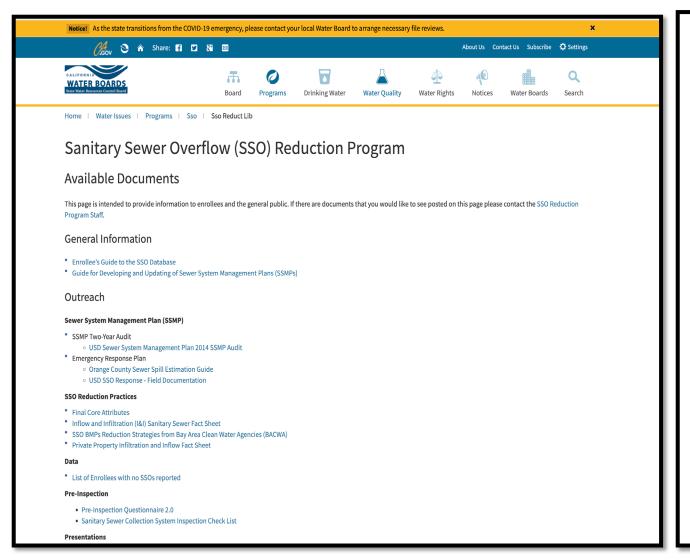
- Past ("reactive") and future ("proactive") posture
- Notification/reporting violations need to be reduced!
- Know your potential climate vulnerabilities
- Answer questions about COVID-19/staffing/Ops
- Pre-Inspection Quest (high expectations/prepare!)

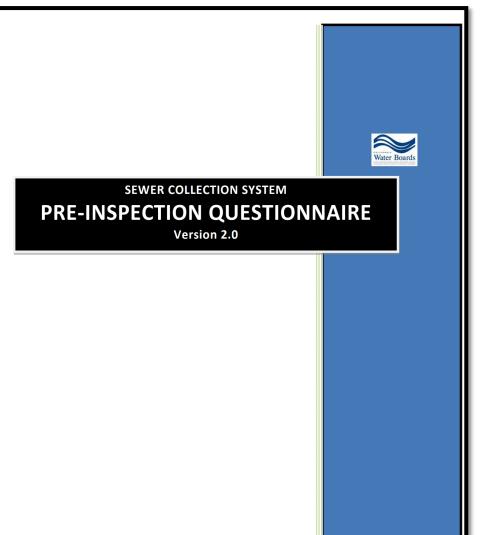
# Reissued WDR - Takeaways





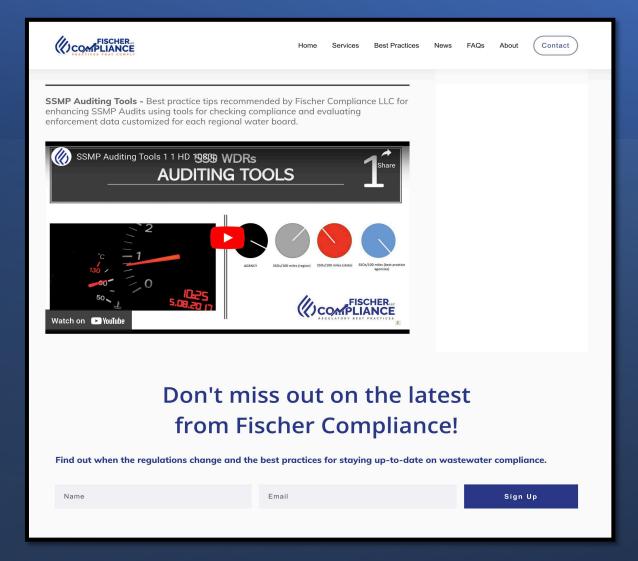








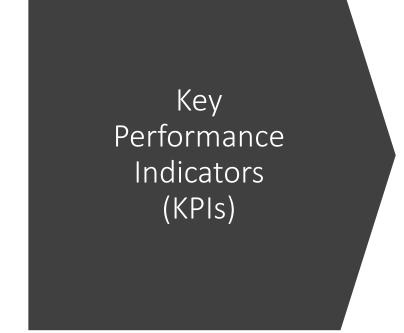












#### **List of KPIs**

KPI 1.1	1-2
KPI 1.2	1-2
KPI 1.3	1-2
KPI 1.4	1-2
KPI 1.5	1-3
KPI 1.6	1-3
KPI 1.7	
KPI 1.8	1-4
KPI 1.9	1-4
KPI 1.10	1-4
KPI 1.11	
KPI 1.12	1-4
KPI 1.13	1-:
KPI 14.1	1-:
KPI 14.1	

https://westbaysanitary.org/wp-content/uploads/2022/09/WBSD\_SSMP2022\_Final.pdf

September 2022 SSMP

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**West Bay Sanitary District** 





Elements. <sup>7</sup>	Key Performance Indicators (KPIs)			
1.0 Goals	KPI 1.1	Annual review of gallons sewage spilled vs. gallons sewage conveyed	Future measurement	
	KPI 1.2	Annual review of gallons sewage spilled vs. gallons sewage recovered	Future measurement	
	KPI 1.3	Annual review of # spills prevented	Future measurement	
	<u>KPI 1.4</u>	Annual review of State Water Board/San Francisco Bay Regional Board Collection System Questionnaires to ensure compliance with all SSS WDRs elements.	Future measurement	





10.0 Audits	KPI 10.1	Were program audits completed as required per compliance schedule?	Measured by Review of audit dates to determine if audit was performed on or before required date.
	<u>KPI 10.2</u>	Did the audit evaluate the effectiveness of the SSMP?	Measured by Review of audit results for effectiveness.
	<u>KPI 10.3</u>	Did the audit evaluate the compliance of the SSMP for all elements per SSS WDRs requirements?	Measured by Review of audit results for compliance.





# YOUTUBE (FISCHER COMPLIANCE LLC)



# What You Will Learn

- 1. Understanding Enforcement
- 2. Auditing your SSMP
- 3. Avoiding Violations
- 4. Being Ready for Inspectors
- 5. Record Keeping and Training









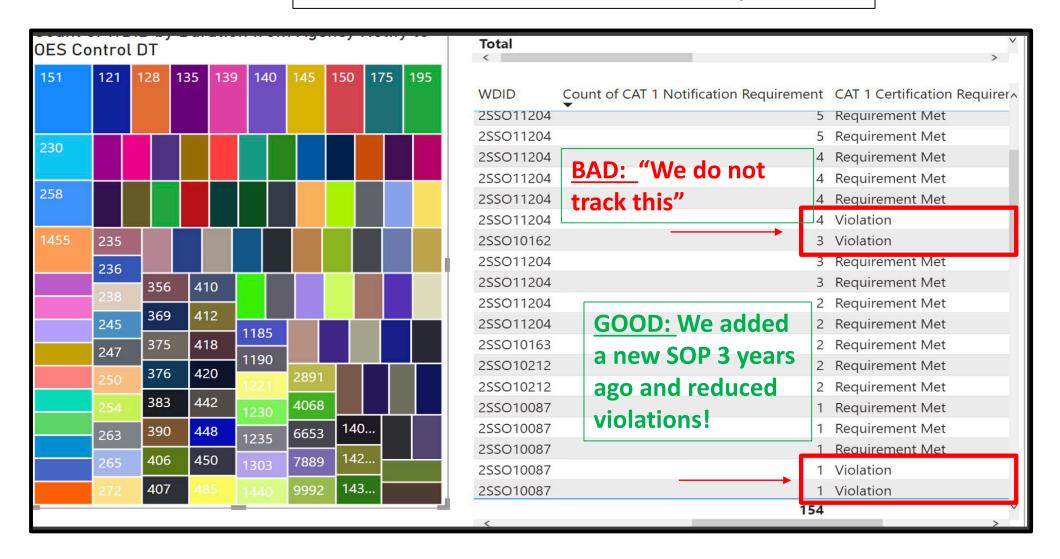


2. Preparing for an unannounced Inspection (exercise)





# **Notification/Certification Compliance**

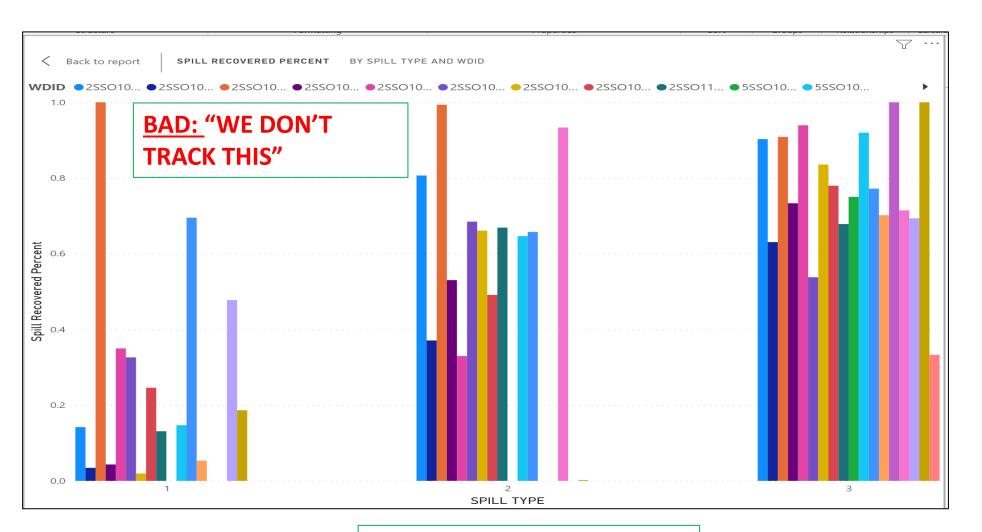






2. Preparing for an unannounced Inspection (exercise)

# **Agency Spill Recovery Compliance (%)**







GOOD: "WE CHECK THIS DATA FOR OUR SSMP AUDITS"!

2. Preparing for an unannounced Inspection (exercise)

2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION



1. SPILL PREVENTION



2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION

- 1.1 (Inspections gravity)
- 1.2 (Inspections, jump stations)

1. SPILL PREVENTION

1.3 (Inspections, rorce mains)





2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION

- 1.1 (Inspections gravity)
- 1.2 (Inspections, jump stations)

1. SPILL PREVENTION

- 1.3 (Inspections, rorce mains)
- 1.4 (Cleaning, gravity)
- 1.5 (Cleaning, p.stations)
- 1.6 (Cleaning, torce mains)





2. SPILL CONTAINMENT

3. SPILL CONTROL

4. SPILL MITIGATION

- 1.1 (Inspections gravity)
- 1.2 (Inspections, Jump stations)

1. SPILL PREVENTION

- 1.3 (Inspections, rorce mains)
- 1.4 (Cleaning, gravity)
- 1.5 (Cleaning, p.stations)
- 1.6 (Cleaning, force mains)
- 1.7 (Critical parts gravity)
- 1.8 (Critical par coump stations)
- 1.9 (Critical parts, force mains)







Thank you CVCWA....and thank you all for attending!



Download presentation

Sanitary Sewer System WDR
Beyond June 5, 2023





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