



Agenda Item # \_\_\_\_\_

# Staff Report

## City of Manhattan Beach

**TO:** Honorable Mayor Aldinger and Members of the City Council

**THROUGH:** Geoff Dolan, City Manager

**FROM:** Jim Arndt, Director of Public Works  
Clarence Van Corbach, Utilities Manager

**DATE:** October 2, 2007

**SUBJECT:** Approve the Manhattan Beach Sewer System Management Plan (SSMP) as required by the SWRCB Order No. 2006.003

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### **RECOMMENDATION:**

Staff recommends that the City Council Approve the Sewer System Management Plan (SSMP), Development Plan, and Schedule.

### **FISCAL IMPLICATION:**

Over the next 9 years video taping the sewer system will cost \$400,000. Funds for video taping are available in this year's budget and will be placed in the operating budgets on a yearly basis.

Professional assistance with the elements of the SSMP over the next two and one-half (2 ½) years will cost \$30,000. Evaluation of System Capacities which will require a new Wastewater System Master Plan, and have an undetermined cost, will likely be in excess of \$300,000. The last Wastewater System Master Plan was conducted in 1994. These costs will be included for Council's consideration in next year's budget.

### **BACKGROUND:**

The City of Manhattan Beach owns and operates a sanitary sewer system. With a population greater than 10,000, the city is required to comply with the State Water Resources Control Board adopted Order No. 2006-003, Statewide General Waste Discharge Requirements (WDR) for Wastewater Collection agencies in May 2006, which states:

“all federal and state agencies, municipalities, counties, districts, and other public entities, known as “Enrollees”, that own or operate a sanitary sewer system greater than one mile in length that collect and/or convey untreated or partially treated

wastewater to a publicly owned treatment facility in the State of California to comply with the terms of this Order.”

**DISCUSSION:**

The WDR Order is designed to facilitate in reducing the amount of Sanitary Sewer Overflows (SSO’s) by outlining steps and actions for Agencies to implement, known as the Sewer System Maintenance Program (SSMP). The City of Manhattan Beach has begun to meet the required steps and actions of the SSMP and will continue to report progress as necessary to the SWRCB. The first requirement of the WDR is to create a plan and schedule for completion of the different elements of the SSMP. The attached plan is presented for Council’s review and approval as required by the WDR.

The elements included and due dates for the SSMP are as follows:

<u>Elements Included</u>	<u>Due Date</u>
1. Goals	11-01-2007
2. Organization	11-01-2007
3. Legal Authority	08-01-2008
4. Operation and Maintenance Program	11-01-2008
5. Design and Performance Provisions	05-09-2009
6. Overflow Emergency Response Plan	11-01-2008
7. Fats, Oils, and Grease (FOG) Control Program	11-01-2008
8. System Evaluation and Capacity Assurance Plan	05-01-2009
9. Monitoring, Measurement, and Program Modifications	05-01-2009
10. SSMP Program Audits	05-01-2009
11. Communication Program	05-01-2009
12. SSMP Completion and Certification	05-01-2009

The attached Plan and Schedule meet elements 1 and 2 of the SSMP. Included in the WDR Order is a specified time schedule for SSMP element completion, based on the population served by the Enrollee. The time schedule has been abbreviated in the above list. Supporting information for each element is included in the appendix of the SSMP Development Plan and Schedule associated with that section, as applicable. In general, information expected to require relatively frequent updates (such as names and phone numbers or staff) are included in appendices, as well as other supporting information such as forms or schedules.

A complete copy of the SSMP Development Plan and Schedule is attached.



# Sewer System Management Plan

September 2007



Prepared By:



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## SSMP DEVELOPMENT PLAN AND SCHEDULE

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## 1. INTRODUCTION

The State Water Resources Control Board adopted Order No. 2006-003, Statewide General Waste Discharge Requirements (WDR) for Wastewater Collection agencies in May 2006, which states:

*“all federal and state agencies, municipalities, counties, districts, and other public entities, known as “Enrollees”, that own or operate a sanitary sewer system greater than one mile in length that collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California to comply with the terms of this Order.”*

The WDR Order is designed to facilitate in reducing the amount of Sanitary Sewer Overflows (SSO's) by outlining steps and actions for Agencies to implement, known as the Sewer System Maintenance Program (SSMP).

The elements included in an SSMP 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
11. Communication Program
12. SSMP Completion and Certification

Included in the WDR Order is a specified time schedule for SSMP element completion, based on the population served by the Enrollee.

## 2. REQUIREMENT

As outlined in the WDR Order, the first requirement is for the Enrollee to create a Plan and Schedule for completion of the different elements of the SSMP. This Plan and Schedule should outline the different elements of the SSMP, identify target completion dates, and assign a responsible party for completion of the elements. The plan then must be submitted to the Enrollee's governing board for approval at a public meeting, as discussed in the WDR Order (2006-0003, Item 13):

*“Both the SSMP and the Enrollee’s Program to implement the SSMP must be certified by the Enrollee to be in compliance with the requirements set forth above [in the WDR order] and must be presented to the Enrollee’s governing board for approval at a public meeting.”*

## 3. SSMP TASK DEVELOPMENT SCHEDULE

The City of Manhattan Beach Public Works Department is located at 3621 Bell Avenue, Manhattan Beach CA 90266. The sanitary collection system, is operated and maintained by the Wastewater Division in the Public Works Department and includes nine pump stations, force mains, and collections systems. Currently the Public Works Department serves a population of approximately 35,000 individuals. As stated in the WDR Order, if an Enrollee serves a population between 10,000 and 100,000 individuals, a Plan and Schedule for the SSMP must be completed and adopted by November 1, 2007.

The following table lists the SSMP Task Development Schedule for the development and implementation of the SSMP elements by the City of Manhattan Beach Public Works Department, Wastewater Division.

Table 1: SSMP Task Development Schedule				
Task	Due Date	Responsible Party	Completion Date	Comments/Requirements
<b>Introduction</b>				
Application of Coverage	11/02/2006	Clarence Van Corbach, Public Works Utilities Manager	09/27/2006	Completed and Submitted Notice of Intent (NOI) to the State.
SSO Electronic Reporting Program	01/02/2007	Clarence Van Corbach, Public Works Utilities Manager	Continuous	The City of Manhattan Beach must report all SSOs to the statewide SSO database via the internet.
SSMP Development Plan and Schedule	08/02/2007	Clarence Van Corbach, Public Works Utilities Manager, with assistance from Risk Management Professionals.	07/13/2007	This report meets the requirements for the SSMP Development Plan and Schedule.
SSMP Gap Assessment	Prior to development of an SSMP.	Clarence Van Corbach, Public Works Utilities Manager, with assistance from Risk Management Professionals.	07/13/2007	The Gap Assessment allows the Agency to determine what SSMP element requirements are currently being met at the facility.



Table 1: SSMP Task Development Schedule				
Task	Due Date	Responsible Party	Completion Date	Comments/Requirements
<b>1.0 Goal</b>				
SSMP Goals	11/01/2007	Clarence Van Corbach, Public Works Utilities Manager, with assistance from Risk Management Professionals and Dudek.	07/13/2007	Stated goals for the SSMP.
<b>2.0 Organizational Structure</b>				
Agency Organizational Structure	11/01/2007	Clarence Van Corbach, Public Works Utilities Manager, with assistance from Risk Management Professionals and Dudek.	07/13/2007	Names and staff positions responsible for developing and implementing the SSMP, including the chain of command for reporting SSOs.
<b>3.0 Legal Authority</b>				
Agencies Legal Authority to Operate and Maintain sewage collection system.	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		Description of the City of Manhattan Beach's authority to operate and maintain the sewage collection system.

<b>Table 1: SSMP Task Development Schedule</b>				
<b>Task</b>	<b>Due Date</b>	<b>Responsible Party</b>	<b>Completion Date</b>	<b>Comments/Requirements</b>
<b>4.0 Operation and Maintenance Program</b>				
Mapping	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to maintain current mapping of the sewage collection system facilities, including appropriate storm water systems.
Preventative Maintenance (PM) Program	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to have a written description of the preventive maintenance activities the agency employs.
Rehabilitation and Replacement Program	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop a short and long-term plan for the rehabilitation or replacement due to system deficiencies including funding.
Inspection Program	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop a program for the regular visual CCTV inspection of the system.

<b>Table 1: SSMP Task Development Schedule</b>				
<b>Task</b>	<b>Due Date</b>	<b>Responsible Party</b>	<b>Completion Date</b>	<b>Comments/Requirements</b>
Staff Training	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to conduct staff O&M training and assure that contractors are adequately trained.
Equipment Parts and Inventory	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop an inventory of equipment and parts, including the identification of critical replacement parts.
<b>5.0 Design and Performance</b>				
Design Standards	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City must implement design standards for new and rehabilitated systems.
Inspection and Testing Standards	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City must implement inspection and testing standards for new and rehabilitated systems.

Table 1: SSMP Task Development Schedule				
Task	Due Date	Responsible Party	Completion Date	Comments/Requirements
<b>6.0 Overflow Emergency Response Plan</b>				
Plan to Respond to SSO's	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop written procedures defining how the agency responds to SSOs.
<b>7.0 Fats, Oil, and Grease (FOG) Control Program</b>				
FOG Ordinance	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop an ordinance defining the legal authority to prevent the discharge of FOG into the system.
FOG Program	11/01/2008	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop a program to reduce or eliminate FOG related SSOs.

<b>Table 1: SSMP Task Development Schedule</b>				
<b>Task</b>	<b>Due Date</b>	<b>Responsible Party</b>	<b>Completion Date</b>	<b>Comments/Requirements</b>
<b>8.0 System Evaluation and Capacity Assurance Plan</b>				
Evaluation of System Capacities	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City is required to evaluate those portions of the system that are experiencing capacity related overflows and establish steps to eliminate capacity related overflows, including I&I program and short and long term CIP for capacity issues.
<b>9.0 Monitoring, Measurement, and Program Modifications</b>				
Monitor and assess effectiveness of SSMP Program	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City is required to maintain records, monitor and assess the effectiveness of the program and update, as necessary.
<b>10.0 SSMP Audits</b>				
Conduct Compliance Audit of SSMP Program	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City is required to conduct SSMP audits every two years.

<b>Table 1: SSMP Task Development Schedule</b>				
<b>Task</b>	<b>Due Date</b>	<b>Responsible Party</b>	<b>Completion Date</b>	<b>Comments/Requirements</b>
<b>11.0 Communications Program</b>				
Communications with Public	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop a public communication program with customers and potential customers that includes the opportunity to provide input during the development, implementation, and performance of the SSMP.
Communications with Satellite Agencies	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City is required to develop a plan for regular communications with satellite agencies connected to the collection system.
<b>FINAL SSMP</b>				
Finalize, Certify, and Implement the SSMP	05/01/2009	Clarence Van Corbach, Public Works Utilities Manager		The City is required to finalize the SSMP after all elements are developed and implemented.

## 4. GAP ASSESSMENT

A Gap Assessment for the development of the Sewer System Management Plan was completed for the City of Manhattan Beach to assess wastewater operations and documentation with regard to SSMP guidelines. The Gap Assessment identified potential areas that require attention during development of the City's SSMP. The following assessment includes the Order item references and the status of the City of Manhattan Beach's implementation of each requirement. Where additional efforts are required by the City, recommendations were developed that were the baseline for the SSMP Development Plan.

**1. Goal**

State Water Resources Control Board Order No. 2006-0003, Item 13 (i):

Regulatory Requirement	Yes	No	N/A	Comments
1.1 Has the following Plans and Schedules been developed to reduce preventable SSO's: a) Management b) Operation c) Maintenance	X			The City of Manhattan Beach has developed a Plan and Schedule, located in the Plan and Schedule element of the SSMP, which addresses the three items listed. The goals are further defined in the Goal Section of the SSMP.
1.2 Has the system capacity been evaluated and document as adequate for current and future needs of the Agency's service area?		X		The City's last Master Plan was conducted in 1994.
1.3 Has the Agency established measurable performance indicators to manage assets at lowest life cycle costs?		X		
<b>Recommendation</b>				
<b>SSMP_2007_001:</b> As the SSMP program is implemented, ensure measurable performance indicators are established to manage assets at lowest life cycle costs.				



**2. Organization**

State Water Resources Control Board Order No. 2006-0003, Item 13 (ii)

Regulatory Requirement	Yes	No	N/A	Comments
2.1 Has a responsible or authorized individual been assigned and certified the elements of the SSMP Program?		X		A responsible individual has been assigned for the SSMP elements, however since the SSMP is still being developed it has yet to be certified.
<b>Recommendation</b>				
<b>SSMP_2007_002:</b> Ensure that the SSMP elements are certified as they are developed.				
2.2 Does the Agency have a current organization chart with responsibilities identified?	X			An organization chart is included as part of the Organization Section of the SSMP.
2.3 Has the Agency identified the chain of communication for reporting SSO's to the appropriate authorities as applicable?	X			In the City of Manhattan Beach Sewer Overflow Response Plan, Section V – Regulatory Agency Notification, the chain of reporting an SSO is listed.

**3. Legal Authority**

State Water Resources Control Board Order No. 2006-0003, Item 13 (iii):

Regulatory Requirement	Yes	No	N/A	Comments
<p>3.1 Has appropriate authority in sewer ordinances, service agreements, or other legally binding procedures been defined for:</p> <ul style="list-style-type: none"> <li>(a) Preventing illicit discharges into its sanitary sewer system;</li> <li>(b) Require that sewers and connections are properly designed and constructed;</li> <li>(c) Appropriate access for maintenance, inspection, and repairs of lateral owned or maintained by the Public Agency;</li> <li>(d) Limit the discharge of fats, oils and grease (FOG) and other debris that may cause blockages; and</li> <li>(e) Enforcement of violations of the Agency’s sewer use and ordinances.</li> </ul>		X		<p>Item (a) is satisfied by the City of Manhattan Beach Municipal Code Title 5, Section 5.36.250, which specifically designates materials that can and can not be disposed of in the City’s collection system.</p> <p>Item (b) is satisfied by the City of Manhattan Beach Municipal Code Title 5, Sections 5.36.160 and 5.36.170, which establish the requirements for the design and construction of sewers.</p> <p>Item (c) is satisfied by the City of Manhattan Beach Municipal Code Title 7, Section 7.36.020, which provides the ability for the City to maintain the public right of way and public facilities, including easements.</p> <p>Item (d) has not been met. However, Title 5, Section 5.36.250 does set up provisions to prohibit discharge of grease and oil into the collection system. The analysis indicates that the City does have a FOG Ordinance that has not been adopted. Once adopted, this ordinance will meet the requirements of Item (d).</p> <p>Item (e) has not been fully satisfied. Title 1, Section 1.04 provides for the enforcement and penalties for violation of the City’s Municipal Code. However, most of the enforcement activities have not been documented.</p>

Regulatory Requirement	Yes	No	N/A	Comments
<b>Recommendation</b>				
<b>SSMP_2007_003:</b> Ensure that a FOG Program is implemented and documented at the Agency. Also, ensure that enforcement activities are documented. The FOG Ordinance must be adopted prior to the regulatory deadline in order to meet the SSMP Legal Authority requirements.				

**4. Operation and Maintenance Program**

State Water Resources Control Board Order No. 2006-0003, Item 13 (iv)

Regulatory Requirement	Yes	No	N/A	Comments
4.1 Does the Agency maintain an up-to-date map of the collection system, that includes: (a) gravity line segments and manholes; (b) pumping facilities; (c) pressure pipes and valves; and (d) applicable stormwater conveyance facilities.	X	X		The City of Manhattan Beach has completed GIS mapping of the sanitary collection system. Maps are also available in work trucks for the Operators.
4.2 Does the Agency have a Preventative Maintenance (PM) program for the collection system?	X			
4.3 Does the Preventative Maintenance (PM) program have a system to document scheduled and conducted activities?	X			The City of Manhattan Beach utilizes an excel database that is divided into districts. These are filled out daily as the work order is completed and kept on file.

Regulatory Requirement	Yes	No	N/A	Comments
4.4 Does the Agency have a rehabilitation and replacement plan to identify system deficiencies?		X		The City of Manhattan Beach completes annual CCTV Inspections to identify system deficiencies as part of its Rehabilitation and Replacement Plan and future needs.
4.5 Does the rehabilitation and replacement plan identify and prioritize system deficiencies and addresses short-term and long-term rehabilitation actions to address deficiencies?		X		Although system deficiencies are identified, the deficiencies are currently not prioritized on a short and long term basis.
<b>Recommendation</b>				
<b>SSMP_2007_004:</b> Ensure that the Rehabilitation and Replacement Plan identifies correcting deficiencies on a short and long term basis.				
4.6 Does the rehabilitation and replacement plan include TV Inspections of manholes and sewer pipes and a system for ranking the condition and scheduling replacement?	X			The City of Manhattan Beach currently hires contractors to complete CCTV inspections on 10% of the sanitary system annually. They also have their own camera in which the system is inspected.
4.7 Does the rehabilitation and replacement plan include a capital improvement plan that addresses proper management and protection of the infrastructure assets?		X		The City of Manhattan Beach does have a Capital Improvement Plan, but it is not current with present and future needs.

Regulatory Requirement	Yes	No	N/A	Comments
4.8 Does the capital improvement plan include a time schedule for implementing short-term and long-term plans and a schedule for developing funds needed for the capital improvement plan?		X		Although the City of Manhattan Beach does have a capital improvement plan, the time schedule for implementation is not identified on a short and long term basis.
4.9 Does the Agency have the ability to provide equipment and replacement parts inventories for critical equipment?	X			The City of Manhattan Beach keeps some critical parts, such as pumps for lift stations, in stock at the facility. If a critical part is needed and not in stock the city keeps a contractor on hand to call if parts are needed.
4.10 Does the Agency provide training to staff in the sanitary sewer system operation and maintenance?	X			Although the City of Manhattan Beach does provide training and pays for operators to attend CWEA training, training is currently not documented.
<b>Recommendation</b>				
<b>SSMP_2007_005:</b> Ensure that training documents are kept for training provided to staff on the sanitary sewer system.				
4.11 If Contractors are used for operation and maintenance does the agency ensure that contractors are properly trained?		X		The City of Manhattan Beach does utilize contractors for maintenance activities.
<b>Recommendation</b>				

Regulatory Requirement	Yes	No	N/A	Comments
<p><b>SSMP_2007_006:</b> Ensure that if Contractors are utilized for maintenance of the sanitary sewer system, that the City of Manhattan Beach documents that they have been properly trained.</p>				
<p>4.12 Does the Agency have an equipment and replacement parts inventories list that includes identification of critical replacement parts?</p>	<p>X</p>			

**5. Design and Construction Standards**

State Water Resources Control Board Order No. 2006-0003, Item 13 (v)

Regulatory Requirement	Yes	No	N/A	Comments
5.1 Have design and construction standards been met for the installation of new sewers and rehabilitation and repair of existing sewers?	X			The City of Manhattan Beach utilizes the “Green Book”, Unified Plumbing Code (UPC), and certified engineers to ensure that design codes and standards are being met.
5.2 Have standards and procedures for inspection and testing for new, repaired and rehabilitated sewers, pumps, and other appurtenances been documented and implemented?	X			The City Municipal Code outlines standards and procedures for contractor and/or individuals to follow regarding the sanitary sewer system. Further the City of Manhattan Beach completes CCTV inspections of newly installed connections to ensure that connections are made according to City codes and standards.



**6. Overflow Emergency Response Plan**

State Water Resources Control Board Order No. 2006-0003, Item 13 (vi)

Regulatory Requirement	Yes	No	N/A	Comments
6.1 Does the Agency have a plan to respond to SSO's?	X			The City of Manhattan Beach maintains a Sewer Overflow Response Plan.
6.2 Has the Agency established procedures for internal and external notifications of SSO's?  Note: Notifications should include primary responders, regulators, and the general public.	X			In the Sewer Overflow Response Plan:  -Section III – identifies Internal Notification;  -Section V – identifies Regulatory Notification; and  -Section VI – identifies Media Notification.

Regulatory Requirement	Yes	No	N/A	Comments
<p>6.3 Does the Agency have written SSO procedures to:</p> <ul style="list-style-type: none"> <li>(b) Investigate &amp; assess</li> <li>(c) Contain</li> <li>(d) Correct cause</li> <li>(e) Estimate Volume</li> <li>(f) Clean Up</li> <li>(g) Sample Receiving waters, if necessary</li> <li>(h) Incident documentation</li> <li>(i) Notification &amp; Reporting requirements</li> <li>(j) Address emergency procedures, including crowd control and traffic operations.</li> </ul>	X			<p>The Sewer Overflow Response Plan list procedures addresses all items listed. The Sewer Overflow Response Plan includes a statement indicating that the City will contact a private laboratory to conduct the sampling. Additionally, item (j) is satisfied because the City of Manhattan Beach Police Department will conduct crowd and traffic control.</p>
<p>6.4 Has the Agency trained employees on SSO Response procedures?</p>	X			<p>Although the facility has trained employees in SSO Response procedures, the training has not been documented.</p>
<p>6.5 Has the Agency trained employees on monitoring and reporting programs?</p>	X			<p>The City of Manhattan Beach has trained the Utilities Manager on the monitoring and reporting programs for an SSO.</p>

**7. Fats, Oils, and Grease (FOG) Control Program**

State Water Resources Control Board Order No. 2006-0003, Item 13 (vii)

Regulatory Requirement	Yes	No	N/A	Comments
<p>7.1 Does the Agency have areas where fats, oils, and grease could affect the collection system?</p> <p>Note:</p> <p>-If the answer to this question is <b>Yes</b>, a FOG Program is required to be implemented.</p> <p>-If the answer to this question is <b>No</b>, a FOG Program is not required however the justification for not have the program must be fully documented.</p>	X			<p>Although the City of Manhattan Beach has recognized areas of FOG problems and taken pre-cautions to protect against FOG problems it currently does not have a FOG Control Program.</p> <p>It is also noted, that the City of Manhattan Beach currently has a Root Control Program for plant roots that may affect the sanitary system.</p>
<p>7.2 Has the Agency identified sections of the sewer system subject to grease blockages?</p>	X			<p>The City of Manhattan Beach has identified areas that may be subject to grease blockages and placed them on a “Hot” list.</p>

Regulatory Requirement	Yes	No	N/A	Comments
7.3 Has the Agency established a maintenance schedule for each section identified to have a FOG problem?	X			The City of Manhattan Beach has included in their FOG Ordinance that the owner and operator responsible for FOG problems is required to maintain the grease inceptors and traps at that location. It is also noted that maintenance records have to be kept for 3 years.
<b>Recommendation</b>				
<b>SSMP_2007_007:</b> Ensure that the FOG Ordinance for the City of Manhattan Beach has been adopted by the governing board at a public meeting.				
7.4 Has the Agency developed and implemented source control measure for all known sources of grease and fats that may be discharged to the sewer system?	X			The City of Manhattan Beach requires that operations that may have high grease and oil production, such as food service preparation, must install and maintain grease inceptors and traps for the City of Manhattan Beach.
7.5 Has the Agency established authority to inspect grease producing facilities and authority to provide enforcement?		X		Although not adopted yet, as listed in the FOG Ordinance the City of Manhattan Beach can take enforcement actions under the Industrial Pretreatment Enforcement Plan and Sewer Use Ordinance.

Regulatory Requirement	Yes	No	N/A	Comments
<p>7.6 Has legal authority been established to:</p> <ul style="list-style-type: none"> <li>(a) prohibit discharges into the collection system</li> <li>(b) ensure grease removal devices (traps and inceptors) are provided</li> <li>(c) Inspected design standards for removal devices</li> <li>(d) Ensure that maintenance requirements are met</li> <li>(e) Ensure that Best Management Practices (BMP) are completed</li> <li>(f) Ensure that record keep and reporting is completed for facilities that have a grease and oil system</li> </ul>		X		<p>By adopting the FOG Ordinance the City of Manhattan Beach will gain legal authority to meet the requirements listed.</p>
<p>7.7 Has the Agency developed a plan and schedule for public education that promotes proper disposal of FOG?</p>	X			<p>The City of Manhattan Beach promotes FOG education by periodically posting information on their website and passing out flyers around the community.</p>

**8. System Evaluations and Capacity Assurance**

State Water Resources Control Board Order No. 2006-0003, Item 13 (viii)

Regulatory Requirement	Yes	No	N/A	Comments
8.1 Has a capital improvement plan to provide hydraulic capacity of key sewer system elements under peak flow conditions been implemented?	X			The City of Manhattan Beach currently maintains a capital improvement plan.
8.2 Does the plan evaluate portions of the collection system experiencing SSO's due to hydraulic deficiency and provide estimates that include:  (a) peak flow, including flows that escape from SSO's;  (b) capacity of key system components;  (c) hydraulic deficiencies;  (d) major sources that contribute to the peak flows associated with overflow events.	X			The sanitary sewer system capacity has been evaluated as part of the City of Manhattan Beach Master Plan.

Regulatory Requirement	Yes	No	N/A	Comments
8.3 Has the plan developed a capital improvement program to address hydraulic deficiencies on a short and long term basis?		X		Although the City of Manhattan Beach has a capital improvement program actions to correct deficiencies are not listed on a short and long term basis.
<b>Recommendation</b>				
<b>SSMP_2007_008:</b> Update the capital improvement program actions to address hydraulic deficiencies on a short and long term basis.				
8.4 Is the plan reviewed and updated every 5 years?			X	Since this is the initial plan development, the five-year review/update is not applicable. However, as the plan is implemented it is required to be reviewed and updated at least every five years.

**9. Monitoring, Measurement, and Program Modifications**

State Water Resources Control Board Order No. 2006-0003, Item 13 (ix)

Regulatory Requirement	Yes	No	N/A	Comments
9.1 Has a monitoring program been implemented to measure the effectiveness of the SSMP Program?			X	As the SSMP is developed a Monitoring program will be established.
<b>Recommendation</b>				
<b>SSMP_2007_009:</b> Ensure that as part of the SSMP development a Monitoring program is implemented to measure the effectiveness of the SSMP.				
9.2 Has the SSMP Program elements been updated when monitoring or performance evaluations were found unsatisfactory?			X	
9.3 Has a monitoring program been implemented to monitor, measure, and adjust preventative maintenance programs and activities to reduce SSO's as necessary?	X			A procedure to track the frequency and location of SSOs is in effect at the City of Manhattan Beach. Each manhole and sanitary sewer main is identified through numbering system that is used for reference and reporting. The information resulting from this procedure aids the City in prioritizing maintenance activities. Additionally, the City of Manhattan Beach utilizes the SSO electronic reporting to monitor SSOs.



Regulatory Requirement	Yes	No	N/A	Comments
9.4 Does the program identify and illustrate SSO Trends, including frequency, location, and volume?	X			See above comment.

**10. SSMP Program Audits**

State Water Resources Control Board Order No. 2006-0003, Item 13 (x)

Regulatory Requirement	Yes	No	N/A	Comments
10.1 Does the Agency conduct SSMP Program audits every 2 years evaluating the effectiveness of the SSMP Program and program compliance?			X	As the SSMP is implemented at the City of Manhattan Beach, SSMP Program Audits will be conducted. A preliminary audit has been completed as part of the development phase of the SSMP.
<b>Recommendation</b>				
<b>SSMP_2007_010:</b> Ensure that as part of the SSMP development, procedures are implemented for Auditing the SSMP.				
10.2 Are copies of the Audit kept on file?			X	
10.3 Are deficient items identified and steps included to correct them?			X	

**11. Communications Program**

State Water Resources Control Board Order No. 2006-0003, Item 13 (xi)

Regulatory Requirement	Yes	No	N/A	Comments
11.1 Has the Agency established a means to communicate to the public the development, implementation, and performance of its SSMP?	X			The City of Manhattan Beach communicates SSMP information via their website and public board meetings.
11.2 Has the communication program allowed for public input to the Agency regarding the SSMP Program?	X			Public input is taken via email or the public board meetings.
11.3 If the facility has Satellite systems, has the Agency created a means of communication with the Satellite system regarding the sanitary sewer system?			X	The City of Manhattan Beach does not contain any Satellite Systems.
<b>Recommendation</b>				
<p><b>SSMP_2007_011:</b> Coordinate with satellite facilities (e.g., shopping malls, mobile home parks, large apartment and condo complexes, housing developments that have not dedicated their sewer system to the City, etc.) throughout the development of the SSMP in order to establish a dialog to ensure any spills or other activities are properly handled and do not impact the City's system.</p>				

**12. Governing Board Certification**

State Water Resources Control Board Order No. 2006-0003, Item 13 (xii)

Regulatory Requirement	Yes	No	N/A	Comments
12.1 Has the City Council/Board adopted the SSMP at a Public Meeting?			X	As the SSMP elements are developed the City of Manhattan Beach has developed requirements for the SSMP to be adopted at public board meetings.

## 5. SSMP DEVELOPMENT PLAN

Based upon the Gap Assessment, recommendations were developed to bring the City of Manhattan Beach's Sewer System Management Plan documentation into compliance with the WDR Order. The SSMP will be developed in accordance with the schedule provided in Section 3.0 SSMP Task Development Schedule and will require the compilation of the documentation already in place by the City, as well as the completion of the recommendations. The table below summarizes the tasks required to develop a compliant Sewer System Management Plan, as well as the projected implementation costs to the City.

Recommendation	Projected Implementation Costs
<b>SSMP_2007_001:</b> As the SSMP program is implemented, ensure measurable performance indicators are established to manage assets at lowest life cycle costs.	<b>\$720</b>
<b>SSMP_2007_002:</b> Ensure that the SSMP elements are certified as they are developed.	<b>\$700 per certification</b>
<b>SSMP_2007_003:</b> Ensure that a FOG Program is implemented and documented at the Agency. Also, ensure that enforcement activities are documented. The FOG Ordinance must be adopted prior to the regulatory deadline in order to meet the SSMP Legal Authority requirements.	<b>\$3,600</b>
<b>SSMP_2007_004:</b> Ensure that the Rehabilitation and Replacement Plan identifies correcting deficiencies on a short and long term basis.	<b>\$4,800</b>
<b>SSMP_2007_005:</b> Ensure that training documents are kept for training provided to staff on the sanitary sewer system.	<b>\$720</b>
<b>SSMP_2007_006:</b> Ensure that if Contractors are utilized for maintenance of the sanitary sewer system, that the City of Manhattan Beach documents that they have been properly trained.	<b>\$960</b>

Recommendation	Projected Implementation Costs
<p><b>SSMP_2007_007:</b> Ensure that the FOG Ordinance for the City of Manhattan Beach has been adopted by the governing board at a public meeting.</p>	<p><b>\$7,840</b></p>
<p><b>SSMP_2007_008:</b> Update the capital improvement program actions to address hydraulic deficiencies on a short and long term basis.</p>	<p><b>\$960</b></p>
<p><b>SSMP_2007_009:</b> Ensure that as part of the SSMP development a Monitoring program is implemented to measure the effectiveness of the SSMP.</p>	<p><b>\$720</b></p>
<p><b>SSMP_2007_010:</b> Ensure that as part of the SSMP development, procedures are implemented for Auditing the SSMP.</p>	<p><b>\$720</b></p>
<p><b>SSMP_2007_011:</b> Coordinate with satellite facilities (e.g., shopping malls, mobile home parks, large apartment and condo complexes, housing developments that have not dedicated their sewer system to the City, etc.) throughout the development of the SSMP in order to establish a dialog to ensure any spills or other activities are properly handled and do not impact the City's system.</p>	<p><b>\$450</b></p>