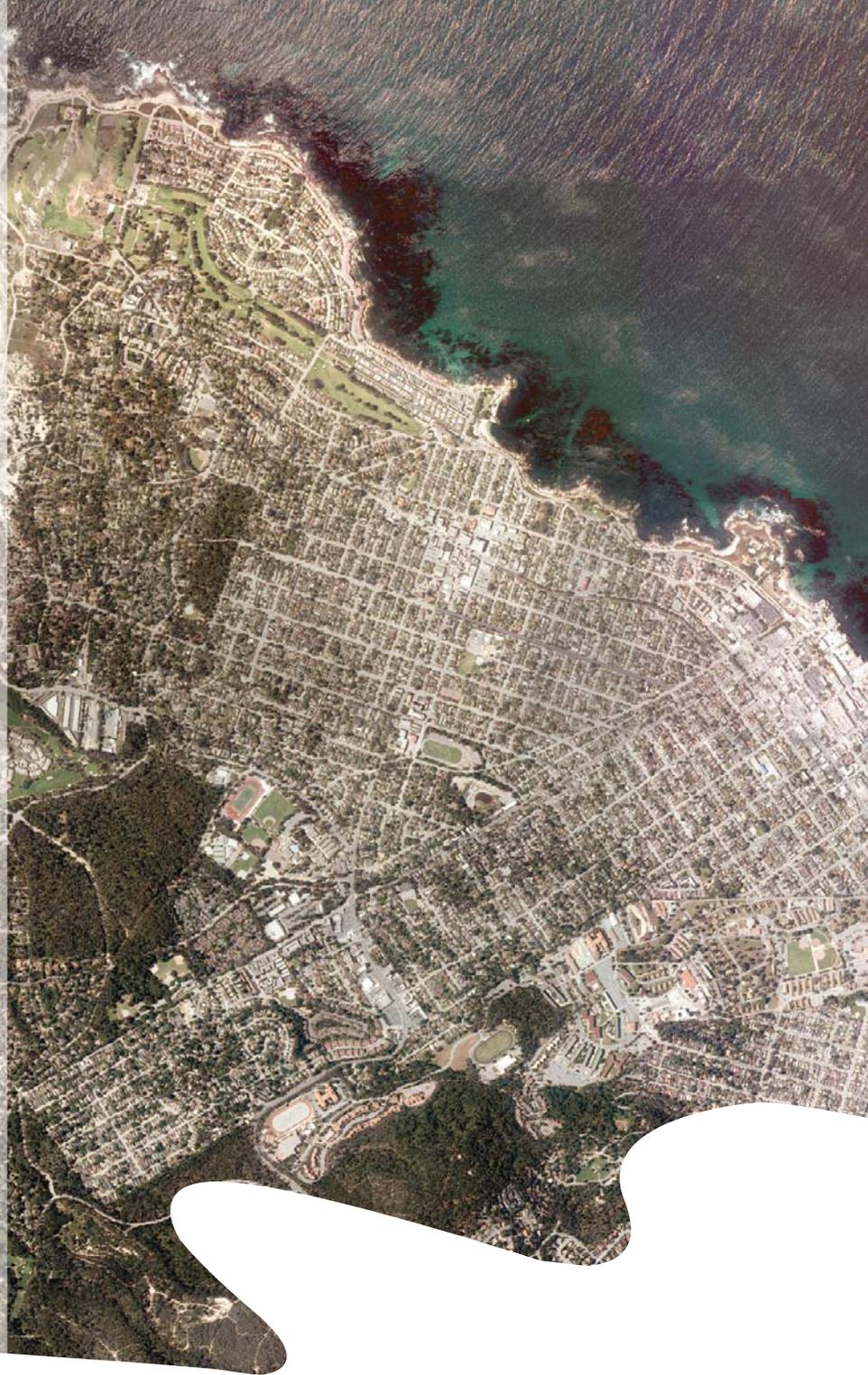




# Sewer System Management Plan Revision 01

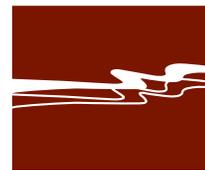


Prepared for

**City of Pacific Grove  
Public Works Department**

June 19, 2013

Prepared by



**WALLACE GROUP®**

612 CLARION COURT  
SAN LUIS OBISPO  
CALIFORNIA 93401  
T 805 544-4011  
F 805 544-4294  
[www.wallacegroup.us](http://www.wallacegroup.us)



**City of Pacific Grove**  
**SEWER SYSTEM MANAGEMENT PLAN**

**Revision 1**

**June 19, 2013**

The Sewer System Management Plan, Revision 1 was created with the expertise of, assistance of, and documentation from the following City of Pacific Grove and Wallace Group Staff:

City Staff

Thomas Frutchey; City Manager

Michael Zimmer; Community Development/Public Works Director

Sherman Low, PE; City Engineer

Sarah Hardgrave; Environmental Programs Manager

Vince Gentry; Wastewater Field Supervisor

Bret Boatman; Maintenance Supervisor

Gary Weier; Source Control Supervisor

Cary Stiebel; GIS Specialist

Lawrence Bangert; Administration

Wallace Group Staff

Steven Tanaka, PE; Director of Water Resources

Kari Wagner, PE; Senior Civil Engineer

Heather Billing; Senior Environmental Compliance Specialist

Bill Callahan; Senior Environmental Compliance Specialist

Anastasia Mylonas, EIT; Engineering Associate III

## **CERTIFICATION STATEMENT**

---

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.

---

Michael Zimmer  
Community Development/Public Works Director

## **TABLE OF CONTENTS**

---

### **Acronyms and Abbreviations**

### **SSMP Update and Adoption Record**

### **Executive Summary**

### **Introduction**

- Section 0.1 – Requirement Background
- Section 0.2 – City of Pacific Grove System Overview
- Section 0.3 – Governing Body
- Appendix 0A – WDR and MRP Orders No. 2006-0003-DWQ and WQ 2008-0002-EXEC
- Appendix 0B – Case No. C03-2612 PVT Consent Decree and Amendment
- Appendix 0C – Meeting Minutes Adopting SSMP, Revision 1

### **Element 1 – Goal**

- Element 1 Revision Record
- Section 1.1 – Regulatory Requirements
- Section 1.2 – Sanitary Sewer System Goals [WDR D.13(i)]

### **Element 2 – Organization**

- Element 2 Revision Record
- Section 2.1 – Regulatory Requirements
- Section 2.2 – Responsible and Authorized Representatives [WDR D.13(ii)(a)]
- Section 2.3 – SSMP Program Implementation [WDR D.13(ii)(b)]
- Section 2.4 – Chain of Communication for Responding to SSOs [WDR D.13(ii)(c)]
- Appendix 2A – City of Pacific Grove Council Members and MRWPCA Representatives
- Appendix 2B – City of Pacific Grove Organization Charts

### **Element 3 – Legal Authority**

- Element 3 Revision Record
- Section 3.1 – Regulatory Requirements

## **TABLE OF CONTENTS**

---

### **Element 3 – Legal Authority (Continued)**

- Section 3.2 – SSMP Sanitary Sewer System Legal Authority [WDR D.13(iii)(a – e)]
- Appendix 3A – City of Pacific Grove Municipal Code Chapter 1.12
- Appendix 3B – City of Pacific Grove Municipal Code Chapter 1.16
- Appendix 3C – City of Pacific Grove Municipal Code Chapter 1.19
- Appendix 3D – City of Pacific Grove Municipal Code Chapter 9.20
- Appendix 3E – City of Pacific Grove Municipal Code Chapter 15.24
- Appendix 3F – City of Pacific Grove Municipal Code Chapter 18.04
- Appendix 3G – City of Pacific Grove Municipal Code Chapter 18.08
- Appendix 3H – City of Pacific Grove Municipal Code Chapter 24.08
- Appendix 3I – MRWPCA Waste Discharge Ordinance, Ordinance No. 2008-01

### **Element 4 – Operation and Maintenance Program**

- Element 4 Revision Record
- Section 4.1 – Regulatory Requirements
- Section 4.2 – Collection System Map [WDR D.13(iv)(a)]
- Section 4.3 – Preventative Maintenance Program [WDR D.13(iv)(b)]
- Section 4.4 – Rehabilitation and Replacement Plan [WDR D.13(iv)(c)]
- Section 4.5 – Training [WDR D.13(iv)(d)]
- Section 4.6 – Equipment and Replacement Parts Inventory [WDR D.13(iv)(e)]
- Appendix 4A – Contract with PIE Services for Computer System Management
- Appendix 4B – Larson Consulting CCTV Summary Report
- Appendix 4C – 2013 CCTV Inspections
- Appendix 4D – Contract with Green Line for Sewer Cleaning
- Appendix 4E – Line Cleaning Documents
- Appendix 4F – Manhole Inspection Forms and Maintenance Reports

## **TABLE OF CONTENTS**

---

### **Element 4 – Operation and Maintenance Program**

- Appendix 4G – Weekly Chemical Root Control Log and HMA List
- Appendix 4H – Contract with MRWPCA for Sewage Lift Station Maintenance
- Appendix 4I – Example Lift Station Logs, Scheduled Work Orders, and Lift Station Work Orders
- Appendix 4J – Fiscal Year 2012/2013 Operating and Capital Budgets and Fees
- Appendix 4K – Pump Station Master Plan
- Appendix 4L – Sewer Lateral Program Documents, Requirements, and Enforcement
- Appendix 4M – Safety Training Records
- Appendix 4N – Sewer Line Cleaning and Manhole Inspection and Rehabilitation SOP
- Appendix 4O – Critical Equipment and Replacement Parts Inventory List

### **Element 5 – Design and Performance Provisions**

- Element 5 Revision Record
- Section 5.1 – Regulatory Requirements
- Section 5.2 – Design and Construction Standards and Specifications [WDR D.13(v)(a)]
- Section 5.3 – Inspection and Testing Procedures and Standards [WDR D.13(v)(b)]
- Appendix 5A – Contract with Neill Engineers Corp. for Design Services
- Appendix 5B – City of Pacific Grove Standard Details for Street Improvements
- Appendix 5C – Contract with City of Seaside for Engineering Support Services

### **Element 6 – Overflow Emergency Response Plan**

- Section 6.1 – Regulatory Requirements
- Section 6.2 – Initial SSO Notification Procedures [WDR D.13(vi)(a)]
- Section 6.3 – SSO Response Program [WDR D.13(vi)(b)]
- Section 6.4 – SSO Notification and Reporting Procedures [WDR D.13(vi)(c)]
- Section 6.5 – OERP Training [WDR D.13(vi)(d)]

## **TABLE OF CONTENTS**

---

### **Element 6 – Overflow Emergency Response Plan (Continued)**

- Section 6.6 – Emergency Operations Procedures [WDR D.13(vi)(e)]
- Section 6.7 – SSO Impact Mitigation Program [WDR D.13(vi)(f)]
- Appendix 6A – Overflow Emergency Response Plan and Associated Emergency Response Procedures
- Appendix 6B – Contract with Green Line for Emergency Call Out Services

### **Element 7 – FOG Control Program**

- Element 7 Revision Record
- Section 7.1 – Regulatory Requirements
- Section 7.2 – FOG Control Program Public Education and Outreach [WDR D.13(vii)(a)]
- Section 7.3 – FOG Disposal Facilities [WDR D.13(vii)(b)]
- Section 7.4 – Discharge Prohibition Legal Authority and SSO Prevention Measures [WDR D.13(vii)(c)]
- Section 7.5 – Grease Removal Devices Design, Installation, and Maintenance Requirements [WDR D.13(vii)(d)]
- Section 7.6 – FOG Control Program Inspection, Enforcement, and Staffing [WDR D.13(vii)(e)]
- Section 7.7 – Grease Problem Area Identification and Sewer Cleaning [WDR D.13(vii)(f)]
- Section 7.8 – Source Control Measure Development and Implementation [WDR D.13(vii)(g)]
- Appendix 7A – MOU with MRWPCA for Conducting a Public Education Program
- Appendix 7B – City of Pacific Grove Municipal Code Chapter 18.08
- Appendix 7C – Clog Busters Outreach: Recycle Turkey Fryer Oil
- Appendix 7D – CalFOG List of Monterey County Grease Haulers
- Appendix 7E – MRWPCA Waste Discharge Ordinance, Ordinance No. 2008-01
- Appendix 7F – City of Pacific Grove Municipal Code Chapter 1.19
- Appendix 7G – Contract with MRWPCA for Grease Source Control Program Services

## **TABLE OF CONTENTS**

---

### **Element 7 – FOG Control Program (Continued)**

- Appendix 7H – Contract with the City of Monterey for Building Official Services

### **Element 8 – System Evaluation and Capacity Assurance Plan**

- Element 8 Revision Record
- Section 8.1 – Regulatory Requirements
- Section 8.2 – Evaluation [WDR D.13(viii)(a)]
- Section 8.3 – Design Criteria [WDR D.13(viii)(b)]
- Section 8.4 – Capacity Enhancement Measures [WDR D.13(viii)(c)]
- Section 8.5 – Schedule [WDR D.13(viii)(d)]

### **Element 9 – Monitoring, Measurement, and Program Modifications**

- Element 9 Revision Record
- Section 9.1 – Regulatory Requirements
- Section 9.2 – Establishing and Prioritizing SSMP Activities [WDR D.13(ix)(a)]
- Section 9.3 – SSMP Implementation Monitoring [WDR D.13(ix)(b)]
- Section 9.4 – Preventative Maintenance Program Assessment [WDR D.13(ix)(c)]
- Section 9.5 – SSMP Updates [WDR D.13(ix)(d)]
- Section 9.6 – SSO Trends [WDR D.13(ix)(d)]
- Appendix 9A – Annual Sanitary Sewer System Goal Evaluation Reports

### **Element 10 – Sewer System Management Plan Program Audits**

- Element 10 Revision Record
- Section 10.1 – Regulatory Requirements
- Section 10.2 – SSMP Program Audits [WDR D.13(x)]
- Appendix 10A – SSMP Data & Records Request

## TABLE OF CONTENTS

---

### Element 11 – Communication Program

- Element 11 Revision Record
- Section 11.1 – Regulatory Requirements
- Section 11.2 – Communication Program [WDR D.13(xi)]
- Appendix 11A – Contracts with MRWPCA for Community Outreach Services
- Appendix 11B – Plumbing Business Workshop Participation List
- Appendix 11C – Hotel Partnering Workshop PowerPoint Presentation
- Appendix 11D – Hotel Partnering Workshop Invitee List
- Appendix 11E – Outreach Examples

## LIST OF TABLES

---

### Element 2 – Organization

- Table 2-1: City of Pacific Grove Authorized Representative Pg. 2-2
- Table 2-2: Staff and Contract SSMP Responsibilities and Contact Information Pg. 2-2

### Element 3 – Legal Authority

- Table 3-1: City of Pacific Grove Legal Authority References Pg. 3-2

### Element 4 – Operation and Maintenance Program

- Table 4-1: Age of Sewer Lines Pg. 4-1
- Table 4-2: Summary of CCTV Sewer Line Condition Assessment Pg. 4-8
- Table 4-3: HMA Cleaning Breakdown Pg. 4-12
- Table 4-4: Lift Station Numbers and Names Pg. 4-14
- Table 4-5: History of Sewer Lateral Replacement Loans Pg. 4-18

### Element 6 – Overflow Emergency Response Plan

- Table 6-1: Regulatory Agency Notification Information for a SSO to Surface Water Pg. 6-6
- Table 6-2: Regulatory Agency Notification Information for Cat. 1 SSO to Land Pg. 6-7

### Element 7 – FOG Control Program

- Table 7-1: City of Pacific Grove and MRWPCA FOG Legal Authority Pg. 7-4
- Table 7-2: Grease Removal Device Design, Installation, and Maintenance Requirements Pg. 7-6
- Table 7-3: FOG Control Program Inspection and Enforcement Legal Authorities Pg. 7-8
- Table 7-4: City of Pacific Grove FOG Program Staffing Pg. 7-10

## **LIST OF TABLES**

---

### **Element 9 – Monitoring, Measurement, and Program Modifications**

- Table 9-1: SSMP Implementation Management Pg. 9-1
- Table 9-2: Number of SSOs per Indicator per Year Pg. 9-8
- Table 9-3: 2008 SSO History Pg. 9-9
- Table 9-4: 2009 SSO History Pg. 9-11
- Table 9-5: 2010 SSO History Pg. 9-12
- Table 9-6: 2011 SSO History Pg. 9-13
- Table 9-7: 2012 SSO History Pg. 9-13

### **Element 10 – Sewer System Management Plan Program Audits**

- Table 10-1: SSMP Audit Ranking Criteria Pg. 10-2

## LIST OF FIGURES

---

### Introduction

- Figure 0-1: Pacific Grove Service Area Pg. 0-2
- Figure 0-2: MRWPCA Facilities Pg. 0-3

### Element 2 – Organization

- Figure 2-1: SSO Response Chain of Communication Pg. 2-12

### Element 3 – Legal Authority

- Figure 3-1: City of Pacific Grove Legal Authority References Pg. 3-2

### Element 4 – Operation and Maintenance Program

- Figure 4-1: Age of City Sewer Lines Pg. 4-2
- Figure 4-2: Sewer System Atlas Pg. 4-4
- Figure 4-3: GIS System Atlas Pg. 4-7
- Figure 4-4: Sewer Tributary Basins Pg. 4-10
- Figure 4-5: High Maintenance Area – Chemical Root Control Pg. 4-13
- Figure 4-6: Rehabilitation and Replacement Projects Pg. 4-17

### Element 6 – Overflow Emergency Response Plan

- Figure 6-1: SSO Response Chain of Command Pg. 6-3
- Figure 6-2: SSO Notification and Reporting Overview Pg. 6-5

### Element 7 – FOG Control Program

- Figure 7-1: Types of Businesses Enrolled in the FOG Control Program in 2012 Pg. 7-1

## ACRONYMS AND ABBREVIATIONS

---

BMP	Best Management Practices
CAP	Capacity Assessment Plan
Cal EMA	California Emergency Management Agency (formerly State OES)
Cal/OSHA	California Division of Occupational Health and Safety
CCR	California Code of Regulations
CCTV	Closed Circuit Television
CDFW	California Department of Fish and Wildlife
CFR	Code of Federal Regulations
CIP	Capital Improvement Plan
City	City of Pacific Grove
CIWQS	California Integrated Water Quality System
CWEA	California Water Environment Association
EHS	Environmental Health Services
ELAP	Environmental Laboratory Accreditation Program
EOP	Emergency Operating Procedure
EPA	Environmental Protection Agency
FOG	Fats, Oil, and Grease
FSE	Food Services Establishment
HMA	High Maintenance Area
I/I	Inflow & Infiltration
IIPP	Injury and Illness Prevention Program
LRO	Legally Responsible Official
MBUAPCD	Monterey Bay Unified Air Pollution Control District
mgd	Million Gallons per Day
MRP	Monitoring and Reporting Program (Used in this SSMP to reference MRP Order No. WQ 2008-0002-EXEC, which is the MRP to WDR Order No. 2006-0003-DWQ.)
MRWPCA	Monterey Regional Water Pollution Control Agency
NOAA	National Oceanic and Atmospheric Administration
OERP	Overflow Emergency Response Plan
OES	Office of Emergency Services
O&M	Operation and Maintenance
OSHA	Occupational Safety and Health Administration

## **ACRONYMS AND ABBREVIATIONS**

---

PLSD	Private Lateral Sewage Discharge
PM	Preventative Maintenance
PPE	Personal Protective Equipment
R&R	Rehabilitation and Replacement
RWQCB	Central Coast Regional Water Quality Control Board
SCADA	Supervisory Control and Data Acquisition
SECAP	Sewer Evaluation and Capacity Assessment Plan
SOP	Standard Operating Procedure
SSOR	Sewer System Overflow Report
SSAMP	Sewer System Asset Management Plan
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflow
SSS	Sanitary Sewer System
SWRCB	State Water Resources Control Board
WDR	Waste Discharge Requirements (Used in this SSMP to reference WDR Order No. 2006-0003-DWQ, the Statewide General WDR for SSSs.)



## **EXECUTIVE SUMMARY**

---

The State Water Resources Control Board's (SWRCB's) Statewide General Waste Discharge Requirements (WDR) for Sanitary Sewer Systems, Order No. 2006-0003-DWQ, and Amended Monitoring and Reporting Program (MRP), Order No. WQ 2008-0002-EXEC, require the City of Pacific Grove (City) to have and maintain a Sewer System Management Plan (SSMP), which provides "a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system" in order to "help reduce and prevent sanitary sewer overflows (SSOs), as well as mitigate any SSOs that do occur" [Order No. 2006-0003-DWQ Section D.13(i)].

The SSMP includes the following eleven (11) Elements:

### **1. Goal**

The City's goals, which are included in the SSMP, are:

- a. Be available and responsive to the needs of the public, and work cooperatively with local, state, and federal agencies to reduce, mitigate, and properly report SSOs.
- b. The Community Development/Public Works Director and/or Environmental Programs Manager will maintain with documentation and update each SSMP Element, which contains schedules and plans to complete operations and maintenance tasks, engineering studies, and SSO monitoring, reporting, and records keeping requirements on an annual basis.
- c. Maintain the number of SSOs to less than three (3) per calendar year.
- d. Have zero (0) capacity related SSOs, except those caused by storm events exceeding the design storm for that section of the collection system.
- e. Have zero (0) SSOs repeated within one (1) year from the same sewer line segment, manhole, or lift station.

### **2. Organization**

The Organization Element of the SSMP identifies the City of Pacific Grove Staff and Contract Staff, who are responsible for implementing the SSMP, responding to SSOs, and meeting the SSO reporting requirements, and identifies the lines of authority of SSO responsibilities and chains of communication for SSO response and reporting. The Legally Responsible Official (LRO) is also designated in this SSMP Element in order to meet the SWRCB requirements for completing and certifying SSO reports in the SWRCB's online regulatory information database and tracking system, California Integrated Water Quality System (CIWQS).

### 3. Legal Authority

This SSMP Element outlines the City Municipal Code Chapters and Monterey Regional Water Pollution Control Agency (MRWPCA) Ordinances that provide the City with the legal authority to:

- a. Prevent illicit discharges;
- b. Require that sewers and connections be properly design and constructed;
- c. Limit the discharge of fats, oils, and grease (FOG) and other debris that may cause blockages; and
- d. Enforce any violation of its sewer ordinances.

### 4. Operation and Maintenance Program

The City's operation and maintenance of its collection system ensures that the system is kept in good working condition, and this SSMP Element outlines the work that is conducted to accomplish the optimal operation and maintenance of the City's collection system. This SSMP Element details a:

- a. Sanitary sewer system map, which is developed and maintained in GIS;
- b. Preventative Maintenance Program, which consists of activities such as cleaning of sewer lines and other regular maintenance;
- c. Rehabilitation and Replacement Plan, which focuses on sewer pipes at risk of collapse or prone to more frequent blockages due to pipe defects and includes a time schedule for funding and completing the capital improvement plan;
- d. Training program and records for City Staff and Contractor collection system operation and maintenance activities; and
- e. Equipment and replacement part inventory with critical replacement parts and equipment identified.

The Operation and Maintenance Program Element will need to be updated to include the recommended capital improvement plan (CIP), funding mechanisms, and CIP time schedule from the Sewer Collection System Master Plan (SCSMP) upon its completion later this year. This SSMP Element will also need to be updated to include the development of Standard Operating Procedures, a formal sewer collection system training program, and a formal list of critical parts and equipment for the City's lift stations once they are developed.

In order for the City to comply with the requirements for this SSMP Element and complete all of the work and projects discussed in this SSMP Element and the other Environmental Programs managed by the City, it is recommended that the City consider filling the vacancies in the wastewater division with either one (1) full-time Maintenance Worker or two (2) part-time Maintenance Workers. It is also recommended that the City

consider creating a new part-time (30 Hours) position of Environmental Compliance Specialist to assist the Environmental Program Manager and Public Works Manager. This position would help to ensure that the implementation and reporting associated with the wastewater and stormwater compliance programs necessitated by the City's location next to an Area of Special Biological Significance and the Monterey Bay National Marine Sanctuary are met.

## **5. Design and Performance Provisions**

The Design and Performance Provisions Element describes the standards and specifications for new construction, repair of the existing sanitary sewer system, and the inspection and testing of these items.

The City has Standard Details for Street Improvements, which includes standard details related to the sanitary sewer system, and the City's Municipal Code Sections 9.20.010, 9.20.030 provide some design specifications. The City also depends on design and construction standards developed for each specific project the City undertakes, such as those used for the City's CIP Phases 1 through 6. The City should formalize or incorporate by reference a complete set of design and construction standards, which must include the installation of new sanitary sewer systems, pump stations, and other appurtenances and the rehabilitation and repair of existing sanitary sewer systems. These standards should include the California Department of Public Health's standards for separation requirements and should specify maximum manhole spacing, gravity sewer pipe sizing and velocity criteria, and pipe material requirements. The City also needs to develop or incorporate by reference a set of inspection and testing procedures and standards, which can be part of these design and construction standards.

## **6. Overflow Emergency Response Plan**

The Overflow Emergency Response Plan (OERP) contains the following information in order to protect public health and the environment in the event of a SSO:

- a. Notification procedures for primary responders and regulatory agencies;
- b. Notification procedures for regulatory agencies and other potentially affected entities for SSOs that potentially affect public health or reach the waters of the State;
- c. OERP training procedures for City Staff and Contractors responsible for responding to SSOs;
- d. Emergency operations procedures for response activities, such as traffic and crowd control; and
- e. A SSO mitigation and impact assessment program.

This SSMP Element will need to be updated with a formal OERP training program once the City develops it as part of the aforementioned operation and maintenance training program.

## **7. FOG Control Program**

The goal of the FOG Control Program is to reduce the amount of FOG discharged to the sanitary sewer system. This SSMP Element includes the following information:

- a. Public education outreach implementation plan and schedule;
- b. FOG disposal plan and schedule;
- c. The legal authority to prohibit FOG discharges and prevent associated SSOs;
- d. Grease control device installation, maintenance, best management practices, and record keeping and reporting requirements and design standards;
- e. High maintenance area identification and cleaning maintenance schedule; and
- f. FOG source control measure development and implementation.

## **8. System Evaluation and Capacity Assurance Plan**

The System Evaluation and Capacity Assurance Plan consists of a sanitary sewer system hydraulic evaluation, which is used to establish appropriate design criteria and a short- and long-term Capital Improvement Program (CIP) with an implementation schedule and identification of funding sources.

The City of Pacific Grove has hired Wallace Group to develop its Sewer Collection System Master Plan (SCSMP), which evaluates the collection system's capacity and maintains a CIP and implementation schedule in order to respond to problem areas identified in these evaluations. This SSMP Element will need to be revised to incorporate the SCSMP upon its completion.

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

The City monitors the implementation of the SSMP Elements in order to measure the effectiveness of the City's SSMP program in reducing SSOs. This SSMP Element outlines the manner in which each SSMP Element is monitored and evaluated and the schedule with which the City completes this monitoring and evaluation.

## **10. Sewer System Management Plan Program Audits**

The SSMP Program Audits Element outlines the audit process and identifies the City Staff responsible for conducting or participating in SSMP Program Audits and generating the required SSMP Program Audit Report. SSMP Program Audits must occur at a minimum of every two (2) years and are required to evaluate the City's SSMP Program, identify program deficiencies, and provide an improvement schedule based on the audit findings.

## 11. Communication Program

This SSMP Element describes the manner in which the City communicates the development, implementation, and performance of its SSMP with the public in order to provide them with the opportunity to provide input as the SSMP program is developed and implemented.

The City has historically conducted outreach specifically to plumbers and to hotels. This outreach is beneficial, and the City should consider the effects plumbers are having on the collection system on an annual basis and the effects hotels are having on the collection system on a biannual basis in order to determine whether such outreach should be included in the next year's Community Outreach Services contract with MRWPCA. At a minimum, plumber and hotel outreach should both be conducted every five (5) years.

The City also needs to create and implement a plan of communication with MRWPCA. A quarterly meeting is recommended in order to increase communication and coordination between the two agencies.

This Sewer System Management Plan (SSMP) was developed in compliance with the requirements of the State Water Resources Control Board (SWRCB) Statewide General Waste Discharge Requirements (WDR), Order No. 2006-0003-DWQ, and Amended Monitoring and Reporting Program (MRP) Order No. WQ 2008-0002-EXEC, which are both included in Appendix 0A.