



San Diego County Sanitation District

AGENDA ITEM

GOVERNING BODY

VACANT
First District

JOEL ANDERSON
Second District

TERRA LAWSON-REMER
Third District

MONICA MONTGOMERY STEPPE
Fourth District

JIM DESMOND
Fifth District

DATE: April 23, 2025

SA01

TO: Board of Directors, San Diego County Sanitation District

SUBJECT

ADOPT A RESOLUTION APPROVING UPDATES TO THE SEWER SYSTEM MANAGEMENT PLAN IN ACCORDANCE WITH THE STATE WATER RESOURCES CONTROL BOARD WASTE DISCHARGE REQUIREMENTS (DISTRICTS: 1, 2 & 4)

OVERVIEW

On May 2, 2006, the California State Water Resources Control Board published the statewide waste discharge requirements (WDR) order, which issued updated regulations for sanitary sewer systems. The WDRs are regulations that govern proper collection and the discharge of wastewater. They protect surface water by either prohibiting discharge of pollutants or assigning requirements for discharge. The WDR mandated local public sewer collection system agencies, such as the San Diego County Sanitation District (District), to develop and implement a system-specific Sewer System Management Plan (SSMP). The SSMP describes County's actions to comply with regulations imposed by the WDRs and other governing agencies. Additionally, the SSMP provides a description of the activities and procedures that District staff follow to efficiently manage, operate, and maintain the sanitary sewer system and to minimize the risk of sanitary sewer overflows. Sewer overflows can potentially reach streets, waterways and homes, and averting sewer spills prevents contamination of rivers, drinking water sources such as Sweetwater Reservoir, prevents public health issues by avoiding exposure to toxins, viruses and bacteria that pose serious health risks and avoids damage to environment. If the District does not update the SSMP as required by the WDR, the California State Resources Control Board will issue a notice of violation to the District and take any legal action for the District's compliance with updating SSMP.

The District provides sewer service to a population of approximately 156,000 customers in the unincorporated areas of San Diego County. Wastewater from the communities of Alpine, East Otay Mesa, Lakeside, Spring Valley, and Winter Gardens is conveyed through a network of sewer pipes and pump stations to the City of San Diego's Point Loma Treatment Plant for treatment and disposal. Wastewater from the communities of Julian, Pine Valley, and Campo is conveyed to nearby District-operated wastewater treatment facilities located in each of these communities for treatment and disposal. The County of San Diego (County) Board of Supervisors (Board) serves as the District's Board of Directors (Directors).

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On December 6, 2022, the California State Water Resources Control Board issued a WDR to regulate and decrease the number of sanitary sewer overflows that occur throughout the state. This action stipulated the next update to the SSMP from the District to be submitted by May 2, 2025, for the collection systems serving populations greater than 100,000. There is no operational change to the District's work by approving this plan. The updates to the 2025 SSMP, include organizational changes, clarifying language, technological improvements (SmartCovers, new Asset Management system, etc.) and updating the new criteria to match existing work.

Today's proposed action for the Directors is to adopt a resolution approving the District's updated SSMP (Attachment B).

RECOMMENDATION(S)

CHIEF ADMINISTRATIVE OFFICER

1. Find, pursuant to Section 15060 of the California Environmental Quality Act (CEQA) Guidelines that the requested action is administrative in nature, and not subject to CEQA as it is not a project as defined in CEQA Guidelines Section 15378.
2. Adopt a resolution entitled: A RESOLUTION OF THE BOARD OF DIRECTORS OF THE SAN DIEGO COUNTY SANITATION DISTRICT RELATING TO APPROVING UPDATES TO THE SEWER SYSTEM MANAGEMENT PLAN IN ACCORDANCE WITH THE STATE WATER RESOURCES CONTROL BOARD WASTE DISCHARGE REQUIREMENTS ORDER WQ 2022-0103-DWQ.

EQUITY IMPACT STATEMENT

The San Diego County Sanitation District (District) strives to preserve environmental resources and enhance quality of life for all regional residents and businesses by providing essential sanitation services and implementing programs and projects. These efforts improve regional community health and environmental quality, while simultaneously complying with mandatory federal, state, and local regulations. The District's services benefit unincorporated communities by reducing the risk of sewage spills and adverse impacts on water quality.

SUSTAINABILITY IMPACT STATEMENT

Today's action supports the San Diego County Sanitation District's (County Sanitation District) focus on the safe collection, treatment, and disposal of wastewater and contributes to environmental, social, and health and well-being sustainability benefits provided through County services. By staying in compliance with the State Water Resource Control Board's regulation the District is able to maintain a well-kept sewer system that protects the health and well-being of the communities it serves and helps protect water quality, both of which are key sustainability goals for the County.

FISCAL IMPACT

There is no fiscal impact to today's request to approve the updated Sewer System Management Plan. There will be no change in net General Fund cost and no additional staff years.

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BUSINESS IMPACT STATEMENT

N/A

ADVISORY BOARD STATEMENT

N/A

BACKGROUND

Waste Discharge Requirements and Sanitary Sewer Management Plan

On May 2, 2006, the California State Water Resources Control Board (SWRCB) published the statewide waste discharge requirements (WDR) order, which issued updated regulations for sanitary sewer systems. The WDRs are regulations that govern proper collection and the discharge of wastewater. They protect surface water by either prohibiting discharge of pollutants or prescribing requirements for discharge. WDRs also protect surface water by prescribing waste containment, treatment, and control requirements. Additionally, the WDR mandated local public sewer collection system agencies, such as the San Diego County Sanitation District (District), to develop and implement a system-specific Sewer System Management Plan (SSMP) by May 2, 2010, and update it every five years subsequently. Per this order, the SSMP must be self-audited every two years and submitted within six months of internal audit completion. The last update of the SSMP was completed in 2020.

The SSMP describes the District's actions to comply with the requirements imposed by the WDRs and other governing agencies. It includes a description of the activities and procedures that District staff follow to efficiently manage, operate, and maintain the sanitary sewer system and to minimize the risk of sanitary sewer overflows (SSOs). The WDRs require the District to conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. The SSMP includes the following information: (1) description of sewer system including population and community served, service area boundary, system size, estimated number of various types of connections, (2) organizational structure that includes organization chart and management, administrative and maintenance positions responsible for implementing the SSMP, (3) copies of current sewer system use ordinances, (4) sewer system operation and maintenance program, (5) design and construction standards and specifications, (6) spill emergency response plan, (7) sewer pipe blockage control program, (8) system and capacity evaluation, condition assessment and capacity evaluation, capital improvement plan, (9) internal audits, and (10) communication program addressing procedures to communicate with: i) public for sewer spills and discharges, and ii) owners/operators of systems that connect to our sewer system for system operation, maintenance, and capital improvement related activities. Hence, it is important the District implement an updated SSMP.

Any sewage spill from a sanitary sewer system will potentially threaten public health, the waters of the United States, and the environment at large. On December 6, 2022, the SWRCB issued a new WDR, WQ 2022-0103-DWQ, to regulate and decrease the number of SSOs that occur throughout the state. WQ 2022-0103-DWQ stipulated the next update to the SSMP be submitted by May 2, 2025 for the collection systems serving populations greater than 100,000. It updated the requirement for the SSMP to be self-audited every three years and updated every six years. The

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goal of the SSMP is to have a plan to properly manage a sanitary sewer system, prevent sewer spills, and mitigation if a spill occurs. To remain effective, the District must conduct an internal audit of its SSMP.

2025 Sewer System Management Plan Update

In continued compliance with the current WDRs, the District conducted an internal audit in January 2025 of the current SSMP (Attachment C). The audit evaluated the SSMP's implementation and effectiveness in preventing spills, compliance with the WDRs, and identifying its deficiencies in addressing ongoing spills and discharges to the waters of the State and necessary modifications to correct deficiencies. As required by the WDRs, the updated SSMP must be approved by its governing body.

A significant component of the SSMP is the Preventative Maintenance Program, which continues to demonstrate effectiveness in system upkeep. Staff consistently meet annual cleaning and inspection targets while maintaining detailed infrastructure records. The District effectively tracks maintenance activities and SSO incidents through both manual and electronic documentation.

Staff regularly tracks performance measures using activity logs to record the length of pipe cleaned, quantity and type of debris removed with the cleaning effort, cause and location of system obstructions and SSOs, and the scheduled maintenance of high frequency maintenance locations. Overall, District crews are on schedule to achieve the yearly cleaning and inspection goals for the wastewater collection system.

The District has effectively managed and maintained information pertaining to the wastewater infrastructure by means of manually recording preventive maintenance activities and documenting notifications received electronically, and regarding potential and actual SSO occurrences. The District will continue to monitor the performance measures it currently tracks and will implement necessary adjustments to the program when needed.

The updates from the previous 2020 SSMP to the 2025 SSMP, include organizational changes, clarifying language, technological improvements (SmartCovers, new Asset Management system, etc.) and updating the new criteria to match existing work. Updates also increased reader accessibility through imbedded hyperlinks via footnotes and expanding the organization section to include key positions/roles. The updated SSMP, including the main body and all appendices, is available for viewing at the following website : <https://www.sandiegocounty.gov/content/sdc/dpw/wasteh2o/sewer-system-management-plan--ssmp-.html>. In addition, paper copies of the SSMP are available for review at the County Department of Public Works, Wastewater Management, County Operations Center, 5510 Overland Avenue, Suite 310, San Diego, CA 92123. Today's proposed action for the Board of Directors is to adopt a resolution approving the District's updated SSMP (Attachment B).

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ENVIRONMENTAL STATEMENT

The proposed action is to adopt a resolution approving updates to the SSMP in accordance with SWRCB WDR. The plan summarizes the San Diego County Sanitation District's wastewater related policies and procedures to remain in compliance with the most current federal, state, and/or local regulations. Section 15060 of the California Environmental Quality Act (CEQA) Guidelines provides that an action is not a project subject to CEQA review if the action will not result in a reasonably foreseeable direct or indirect physical change in the environment or is not a project as defined in Section 15378 of the CEQA Guidelines. Section 15378 provides that organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment are not projects. The updates to the SSMP are a purely administrative matter that will not have any effect on the physical environment and is not a CEQA project.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today's proposed action to approve the updated SSMP supports the Sustainability, Community and Equity initiative in the County's 2025-30 Strategic Plan by reducing environmental risk by ensuring a well-structured, properly planned, well-coordinated and cost-effective program for providing reliable and efficient sewage collection, treatment, and disposal with reduced risk of sanitary sewer overflows and system failures in the future.

Respectfully submitted,



DAHVIA LYNCH

Deputy Chief Administrative Officer

ATTACHMENT(S)

Note: Due to the size of the attachments, the documents are available online through the Clerk of the Board's website at www.sandiegocounty.gov/content/sdc/cob/bosa.html.

A: Sewer System Management Plan

B: Resolution Approving Updates to the Sewer System Management Plan

C: Audit of the Sewer System Management Plan