

Oceano Community Services District Sewer System Management Plan - Internal Audit Program 2024 Audit (for Calendar Years 2022 and 2023)

The audit program includes excerpts from State Water Board Order wqo2006_0003, Section D.13, which is the basis for “evaluating the effectiveness of the SSMP and the Enrollee’s compliance with the SSMP requirements” pursuant to Section D.13(x) entitled SSMP Program Audits.

This audit program was adopted by the Oceano Community Services District (OCSD) Board of Directors on January 28, 2015. It is incorporated as Appendix “F” in the 2020 OCSD Sewer System Management Plan.

Eleven Elements of the Sewer System Management Plan (SSMP)

SSMP’s include the following eleven elements unless the enrollee can justify why an element is not applicable. The 2020 SSMP Update adopted by the OCSD Board of Directors on February 26, 2020, included all eleven elements.

- (i) Goals
- (ii) Organization
- (iii) Legal Authority
- (iv) Operation and Maintenance Program
- (v) Design and Performance Provisions
- (vi) Overflow Emergency Response Plan
- (vii) FOG Control Program
- (viii) System Evaluation and Capacity Assurance Plan
- (ix) Monitoring, Measurement, and Program Modifications
- (x) SSMP Program Audits
- (xi) Communication Program

Each element is audited by 1) evaluating the implementation of prior audit findings, and 2) evaluating the District’s implementation efforts during the audit period in comparison to the adopted SSMP. A narrative is provided for each element, including a discussion on audit steps, findings, and a schedule to implement recommendations, if any.

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Element (i) – Goals

SSMP Requirement: Establishing Goals	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. This will help reduce and prevent SSOs, as well as mitigate any SSOs that do occur.	Y	R

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

Goals were established and included in the 2020 SSMP Update approved by the Board of Directors on February 26, 2020.

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Are the goals stated in the SSMP still appropriate and accurate?

The goals are still appropriate. No Changes to Goals are recommended.

The 2020 SSMP Update includes goals and objective performance measurements. The following are the stated goals and audit findings.

To be available and responsive to the needs of the public in reference to the public sewer system	Goal was achieved.
To work cooperatively with local, state, and federal agencies to reduce, mitigate and properly report SSOs	Goal was achieved. Updated and submitted the SSMP in 2020 and ongoing reporting is being met.
To properly manage and maintain the District public sewer system lines to minimize SSOs	Goal was achieved.
To meet all applicable regulatory notification and reporting requirements	Goal was achieved.

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The following table compares the objective performance measurements stated in the SSMP versus actual results during the audit period:

100% of monthly CIWQS reports are submitted accurate and on time.	100% were submitted accurately and on time.
100% of work orders are completed, documented, and filed in accordance with the SSMP.	Before 2019, FOG permits were maintained at South San Luis Obispo County Sanitation District. The OCSD took over the program in-house and the files are maintained at the District office.
100% of any reportable spills are submitted in accordance with the reporting requirements.	100% of reportable spills were submitted in accordance with reporting requirements.
100% of FOG inspections are completed on time	28 out of 28 inspections complete for 2020. 31 out of 32 inspections complete for 2021.
100% of jetting and maintenance is completed, including for High Maintenance Areas.	100% of jetting and maintenance was completed, including for High Maintenance Areas.
An audit report is place on the Board of Directors agenda every other year, no later than February 28 th , that provides the statistics on these goals for the prior calendar year.	In 2020 the Board adopted an updated SSMP report. This is the first two- year audit of the 2020 SSMP. The Utility System Manager provides a verbal report to the Board of Directors on each spill during his operations updates included in every regular agenda.

2(b): Findings:

FOG inspections were not completed 100%. Instances include temporary closures due to COVID-19.

2(c): Schedule to Implement Recommendations, if any.

Administrative Files previously established in the District office and are maintained and updated with each inspection.

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Element (ii) – Organization

SSMP Requirement: The SSMP must identify individuals and chains of communication.	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
(a) The name of the responsible or authorized representative as described in Section J of this Order.	n/a	C
(b) The names and telephone numbers for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program. The SSMP must identify lines of authority through an organization chart or similar document with a narrative explanation	n/a	C
(c) The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES))	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

N/A

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Is the SSMP up to date with agency organization and staffing contact information?

The organization chart is up to date.

- ii. Are procedures established to comply with the SMMP?

The two-year audit and SSMP Updates reflect necessary procedures. Staff updates phone numbers and individual names as changes occur.

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2(b): Findings: N/A

2(c): Schedule to Implement Recommendations, if any.

N/A

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Element (iii) - Legal Authority

SSMP Requirement: Each Enrollee must demonstrate, through sanitary sewer system use ordinances, service agreements, or other legally binding procedures, that it possesses the necessary legal authority to implement the SSMP	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
(a) Prevent illicit discharges into its sanitary sewer system (examples may include I/I, storm water, chemical dumping, unauthorized debris and cut roots, etc.)	n/a	C
(b) Require that sewers and connections be properly designed and constructed	n/a	C
(c) Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency	n/a	C
(d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages	n/a	C
(e) Enforce any violation of its sewer ordinances	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

n/a.

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

i. Does the SSMP contain up-to-date information about your agency's legal authority?

Yes

ii. Does your agency have sufficient legal authority to control sewer use and maintenance as required?

Yes

2(b): Findings:

2(c): Schedule to Implement Recommendations, if any.

N/A

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Element (iv) – Operation and Maintenance Program

SSMP Requirement: The SSMP must include those elements listed.	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
(a) Maintain an up-to-date map of the sanitary sewer system, showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable storm-water conveyance facilities	n/a	C
(b) Describe routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the sanitary sewer system with more frequent cleaning and maintenance targeted at known problem areas. The Preventative Maintenance (PM) program should have a system to document scheduled and conducted activities, such as work orders	n/a	C
(c) Develop a rehabilitation and replacement plan to identify and prioritize system deficiencies and implement short-term and long-term rehabilitation actions to address each deficiency. The program should include regular visual and TV inspections of manholes and sewer pipes, and a system for ranking the condition of sewer pipes and scheduling rehabilitation. Rehabilitation and replacement should focus on sewer pipes that are at risk of collapse or prone to more frequent blockages due to pipe defects. Finally, the rehabilitation and replacement plan should include a capital improvement plan that addresses proper management and protection of the infrastructure assets. The plan shall include a time schedule for implementing the short- and long-term plans plus a schedule for developing the funds needed for the capital improvement plan	n/a	R
(d) Provide training on a regular basis for staff in sanitary sewer system operations and maintenance, and require contractors to be appropriately trained	n/a	C
(e) Provide equipment and replacement part inventories, including identification of critical replacement parts	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

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Part One: Implementation of Prior Audit Findings:

District staff has developed a “hot spot” list where the system is vulnerable and maintains those areas more frequently. A Sewer System Capital Improvement Program needs to be developed like the Water System Capital Improvement Program.

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

Are the District’s collection system maps complete, up-to-date, and sufficiently detailed?	Yes
Is the District’s preventive maintenance program up-to-date and documented?	Yes
Is the District’s preventative maintenance program sufficient and effective in reducing and preventing SSO’s and blockages?	Yes
Are your agency’s inspections and condition assessments up-to-date and documented?	Yes
Are the District’s scheduled inspections and condition assessment system effective in locating, identifying, and addressing deficiencies?	Yes
Is the District’s training program sufficient and documented?	In 2019 District Staff took over the permitting, inspection, and compliance requirements of the program. The District uses an online program called Target Solutions to take on-going training courses virtually.

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Are the District's equipment and part inventory sufficient and documented?	Yes - Updates done annually and due to the limited nature of the inventory a more frequent update is not necessary.
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2(b): Findings:

The District complied with Operations and Maintenance requirements. Upgrading maps and other record keeping into electronic format is ongoing.

2(c): Schedule to Implement Recommendations, if any.

N/A

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Element (v) - Design and Performance Provisions

SSMP Requirement	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
(a) Design and construction standards and specifications for the installation of new sanitary sewer systems, pump stations and other appurtenances; and for the rehabilitation and repair of existing sanitary sewer systems	n/a	C
(b) Procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances and for rehabilitation and repair projects	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

N/A

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Are design and construction standards, as well as standards for inspection and testing of new and rehabilitated facilities, sufficiently comprehensive and up-to-date?

Yes

- ii. Are the District's conditions on new development sufficient and up-to-date when modifications to the District's system are needed to provide service to the development?

Yes

2(b): Findings:

The District's standards are up to date and sufficient and the conditions on new development are up to date and sufficient.

2(c): Schedule to Implement Recommendations, if any.

N/A

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Element (vi) - Overflow Emergency Response Plan

SSMP Requirement: Each Enrollee shall develop and implement an overflow emergency response plan that identifies measures to protect public health and the environment.	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
(a) Proper notification procedures so that the primary responders and regulatory agencies are informed of all SSOs in a timely manner	n/a	C
(b) A program to ensure an appropriate response to all overflows	n/a	C
(c) Procedures to ensure prompt notification to appropriate regulatory agencies and other potentially affected entities (e.g. health agencies, Regional Water Boards, water suppliers, etc.) of all SSOs that potentially affect public health or reach the waters of the State in accordance with the MRP. All SSOs shall be reported in accordance with this MRP, the California Water Code, other State Law, and other applicable Regional Water Board WDRs or NPDES permit requirements. The SSMP should identify the officials who will receive immediate notification	n/a	C
(d) Procedures to ensure that appropriate staff and contractor personnel are aware of and follow the Emergency Response Plan and are appropriately trained	n/a	C
(e) Procedures to address emergency operations, such as traffic and crowd control and other necessary response activities	n/a	C
(f) A program to ensure that all reasonable steps are taken to contain and prevent the discharge of untreated and partially treated wastewater to waters of the United States and to minimize or correct any adverse impact on the environment resulting from the SSOs, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

N/A

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Does the District maintain up-to-date information on its Overflow Emergency Response Plan?

Yes

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- ii. Considering the District's information, is the Overflow Emergency Response Plan effective in handling SSO's?

Yes

2(b): Findings:

Overall, the operating staff does have procedures, are knowledgeable of their response requirements, and is utilizing industry guidelines as needed.

2(c): Schedule to Implement Recommendations, if any.

N/A

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Element (vii) - FOG Control Program

SSMP Requirement: The Enrollee must prepare and implement a FOG source control program to reduce the amount of these substances discharged to the sanitary sewer system	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
(a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of FOG	n/a	C
(b) A plan and schedule for the disposal of FOG generated within the sanitary sewer system service area. This may include a list of acceptable disposal facilities and/or additional facilities needed to adequately dispose of FOG generated within a sanitary sewer system service area	n/a	C
(c) The legal authority to prohibit discharges to the system and identify measures to prevent SSOs and blockages caused by FOG	n/a	C
(d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, BMP requirements, record keeping and reporting requirements	n/a	C
(e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance	n/a	C
(f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section	n/a	C
(g) Development and implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified above	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

N/A

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Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Does the District maintain up-to-date information on its FOG control program?

Yes, all maintained at the District's office.

- ii. Is the FOG control program effective?

Yes, no violations were issued during this audit period.

2(b): Findings: None

2(c): Schedule to Implement Recommendations, if any. N/A

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Element (viii) - System Evaluation and Capacity Assurance Plan

SSMP Requirement: The Enrollee shall prepare and implement a capital improvement plan (CIP) that will provide hydraulic capacity of key sanitary sewer system elements for dry weather peak flow conditions, as well as the appropriate design storm or wet weather event.	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
(a) Evaluation: Actions needed to evaluate those portions of the sanitary sewer system that are experiencing or contributing to an SSO discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity) and the major sources that contribute to the peak flows associated with overflow events	n/a	C
(b) Design Criteria: Where design criteria do not exist or are deficient, undertake the evaluation identified in (a) above to establish appropriate design criteria	n/a	C
(c) Capacity Enhancement Measures: The steps needed to establish a short- and long-term CIP to address identified hydraulic deficiencies, including prioritization, alternatives analysis, and schedules. The CIP may include increases in pipe size, I/I reduction programs, increases and redundancy in pumping capacity, and storage facilities. The CIP shall include an implementation schedule and shall identify sources of funding	n/a	R
(d) Schedule: The Enrollee shall develop a schedule of completion dates for all portions of the capital improvement program developed in (a)-(c) above. This schedule shall be reviewed and updated consistent with the SSMP review and update requirements as described in Section D. 14	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

N/A

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Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Does the District maintain up-to-date information about its capacity assessment? [Yes, see below.](#)
- ii. Has the District completed a capacity assessment and identified and addressed any hydraulic deficiencies in the system? [Yes; no hydraulic deficiencies identified.](#)

2(b): Findings:

[These audit findings are consistent with the 2019 audit, which follows.](#)

[In the SSMP, a “Technical Memorandum Wastewater Collection System Study” dated September 16, 2009 is included as an attachment. In that technical memorandum, it states “At this time, there are no identified system capacity concerns and therefore no capital improvement projects are recommended.” The District continues to rely upon this Technical Memorandum. An update of the Technical Memorandum should be completed. Staff efforts to secure funding have been on-going, like the grant funding obtained for the water system, will then issue a request for proposal \(RFP\) to update to the 2009 evaluation and a capital improvement plan.](#)

2(c): Schedule to Implement Recommendations, if any.

[Within the next audit period, the system capacity analysis and CIP should be updated.](#)

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Element (ix) - Monitoring, Measurement, and Program Modifications

SSMP Requirement	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
Maintain relevant information that can be used to establish and prioritize appropriate SSMP activities	n/a	C
Monitor the implementation and, where appropriate, measure the effectiveness of each element of the SSMP	n/a	C
Assess the success of the preventative maintenance program	n/a	C
Update program elements, as appropriate, based on monitoring or performance evaluations	n/a	C
Identify and illustrate SSO trends, including: frequency, location, and volume	n/a	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Does the District maintain up-to-date information about its data collection and organization?
Yes
- ii. Is the District’s data collection and organization sufficient to evaluate the effectiveness of your SSMP?
Yes

2(b): Findings: None

2(c): Schedule to Implement Recommendations, if any.
N/A

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Element (x) - SSMP Program Audits

SSMP Requirement	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
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.	Yes	C

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

Implementation of prior audit findings were included into the 2020 update. Each element of this audit identifies which items continue to be work in progress.

Since it is appropriate to conduct the audits and related SSMP activities based on the size of the system and number of SSO's, the various recommendations included in the audit often exceed the basic regulatory requirements. Nevertheless, continuous enhancements support effective program implementation and will be continued.

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

Are the District's audits being completed in a timely manner with sufficient detail and findings to ensure that the SSMP is updated in a timely manner and that any changes to the District's policies, procedures and practices are implemented in a timely manner?
 Yes

Will this SSMP Audit be submitted with the Annual Report to the Regional Water Board by March 15?
 Yes

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2(b): Findings:

Although continuous improvements are recommended, the District is complying with SSMP requirements, SSO response requirements, and the overall requirements of the SSMP.

2(c): Schedule to Implement Recommendations, if any.

No audit related recommendations.

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Element (xi) - Communication Program

SSMP Requirement	Were Prior Audit Findings Implemented? (y/n)	Current Findings (C/NC/R)
The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented	Yes	C
The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system	n/a	R

Findings: C = Compliant NC = Non-Compliant R = Recommendations

Part One: Implementation of Prior Audit Findings:

The 2020 update to the SSMP was presented at the February 26, 2020 regular Board meeting and is on the District website: <https://oceanocsd.org/wp-content/uploads/2020/02/FINAL-OCSD-SSMP-2020-UPDATE.pdf>

Part Two: Comparison to Current SSMP

2(a): Audit Steps:

- i. Does the District maintain up-to-date information about its public outreach activities? **Yes – Information is provided to food service establishments and any overflows from private property.**
- ii. Does the District maintain up-to-date information about its communications with satellite and tributary agencies? **Yes. The FOG program and emergency events are coordinated with the County.**
- iii. Does the District effectively communicate with the public and other agencies about the SSMP, and address feedback? **Yes, SSMP updates and audits provided to the Regional Board.**

2(b): Findings: **None**

2(c): Schedule to Implement Recommendations, if any. **N/A**