## CITY OF LAKEWOOD SEWER SYSTEM MANAGEMENT PLAN



## July 28, 2014

7/28/14

There are no changes to the 2009 SSMP for the City of Lakewood. The next SSMP recertification will take place on July 28, 2019.

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#### ABBREVIATIONS/ACRONYMS

ACO APWA CADD CALOSHA CIWQS CCTV CMC CSMD FOG GIS HDPE I/I LAC DPW LACO CODE LACO PLUMBIMG CODE MARINA SMD MMS NOI OES RWQCB SMD SO&M	Accumulative Capital Outlay Program American Public Works Association Computer Aided Design Drafting California Occupation, Safety And Health Administration California Integrated Water Quality System Closed – Circuit Television City Municipal Codes Consolidated Sewer Maintenance District Fats, Oil, and Grease Geographical Information System High Density Polyethylene Pipe Infiltration inflow Los Angeles County Department of Public Works Los Angeles County Code Title 20 – Utilities Los Angeles County Plumbing Code – Title 28 Marina Sewer Maintenance District Maintenance Management System Notice of Intent Office of Emergency Service Regional Water Quality Control Board Sewer Maintenance Districts Sewer Operation and Maintenance
	Regional Water Quality Control Board
-	
SSMP	Sewer System Management Plan
SSOs SU	Sanitary Sewer Overflows
SU SWRCB	Sewage Unit State Water Resources Control Board
WDRs	Statewide General Waste Discharge Requirements

#### DEFINITIONS

**Geographical Information System (GIS)** – A database linked with mapping, which includes various layers of information used by government officials. Examples of information found on a GIS can include a sewer map; sewer features such as pipe location, diameter, length, material, condition, last date cleaned or repaired. The GIS also typically contains base information such as streets and parcels.

**Infiltration/Inflow (I/I)** – Infiltration is generally considered to be extraneous water that enters the sewer system over longer periods of time, such as groundwater seepage through cracks in the sewer. Inflow is generally considered to be extraneous water that enters the system as a direct result of a rain event, such as through defects in the sewer. While it is impossible to control all I/I, it is certainly desirable to reduce I/I when cost-effective.

**Lateral** – The portion of sewer that connects a home or business with the main line in the street.

**Stoppage** – A build up of debris in the sewer, which stops the flow of wastewater and allows the water to back up behind the stoppage, which sometimes causing an overflow, also called a blockage.

**Blockage** – A build up of debris in the sewer, which stops the flow of wastewater and allows the water to back up behind the stoppage, sometimes, causing an overflow, a\lso called a stoppage.

**Wastewater Collection System** – All pipelines, pump stations, and other facilities upstream of the headworks of the wastewater treatment plant that transport wastewater from its source to the wastewater treatment plant.

#### CITY OF LAKEWOOD SEWER SYSTEM MANAGEMENT PLAN (SSMP)

#### INTRODUCTION

On May 2, 2006 the State Water Resources Control Board (SWRCB) adopted a Statewide General Waste Discharge Requirements and Monitoring and Reporting Program (WDRs), for sanitary sewer systems by issuing Order No. 2006-003 (Appendix A). The regulations in the Order were in response to growing public concern about the water quality impacts of Sanitary Sewer Overflows (SSOs), particularly those that cause beach closures, adverse effects to other bodies of water, or pose serious health and safety or nuisance problems.

Two major components of the WDRs require the following:

- (1) The requirements that owners/operators of publicly owned Sewer Collection Systems, a mile long or greater, must apply for coverage under the WDRs; and,
- (2) The owners/operators must develop and implement a System Management Plan (SSMP) specific to the sanitary sewer system.

In compliance with the first component, the City of Lakewood (City) filed a Notice of Intent (NOI) application form with the SWRCB on October 30, 2006. The City subsequently received a Username and Password for electronic access to the California Integrated Water Quality System (CIWQS) database. Within the database-reporting program, the City completed a "collection system questionnaire" and will file all subsequent updates and all required SSO reporting.

In compliance with the second component, this document was prepared to meet the objectives contained in the WDR Order. Since the Consolidated Sewer Maintenance District (CSMD) of the Los Angeles County Sewer Maintenance Districts (SMD), provides operation and maintenance services for the City's sewer facilities, some components of the City's SSMP are the same as those of the SMD's. This document is divided into 12 chapters, which closely align with the respective provisions contained in the WDR's. Every section or subsection of each chapter addresses one of the key elements of the SSMP directive.

This document, with other existing Agency Programs referenced herein, constitute the City's SSMP. By implementing the procedures contained in this SSMP, the occurrence of SSOs should decrease or possibly be avoided throughout the City's Sanitary Sewer Collection System.

#### 1.0 GOALS AND ACTIONS

- 1.1 The goals of this SSMP are to ensure the following:
  - 1. The City's sanitary sewer collection system is properly operated, maintained and managed to reduce frequency and severity of sanitary sewer overflows (SSOs) and their potential impacts on public health, safety, and the environment.
  - 2. When an SSO occurs, prompt action is taken to identify, contain, and remove the cause; report the event to the appropriate regulatory authorities; and notify the public in a timely manner,
  - 3. All SSOs, system deficiencies, and remedial actions taken are well documented, or
  - 4. The City's sewer system operators, employees, contractors, responders, and other agents are adequately trained and equipped to address an SSO event.
  - 5. The City's sewer system is designed, constructed and funded to provide adequate capacity to convey base flows and peak flows, while meeting or exceeding applicable regulations, laws and the generally accepted practices relative to sanitary sewer system operation and maintenance.
- 1.2 The <u>actions</u> to be taken to satisfy the SSMP are as follows:
  - 1. Conduct a planned and scheduled maintenance program to minimize the risk and occurrence of SSOs.
  - 2. When an SSO occurs, respond to the incident in a timely manner and undertake feasible remedial actions to contain the overflow, including stopping the flow from reaching the storm drain, if possible.
  - 3. Stop the sewer overflow as soon as possible and limit public access to the overflow area to prevent public contact with any wastewater contamination.
  - 4. If possible, completely recover the overflow sewage, return it to the sewer system, and clean up the contaminated area.
  - 5. Gather and compile all pertinent information regarding the sewer overflow incident, investigate as necessary to determine probable cause, document findings, report the incident to the appropriate regulatory agencies in a timely manner, and file a copy of the report.

#### 2.0 DESCRIPTION OF THE ORGANIZATION

#### 2.1 Management

The City serves a population of approximately 79,345 people. The City's Public Works Department (PWD) oversees the City's sanitary sewer collection system. The total annual budget for system operation, maintenance and administration is \$233,000. The collection system consists of about 166.08 miles of gravity sewer lines and one (1) pump station. The City's local sewers discharge into the CSMD and the County Sanitation Districts of Los Angeles County facilities for facilities for conveyance, treatment, and disposal.

The City has one (1) budgeted management positions directly involved in sewer system responsibilities. The field operation and maintenance services are fulfilled by utilizing the services provided by the CSMD managed by the Los Angeles County Department of Public Works (County DPW). The distribution of the City's personnel and the contracted services are depicted in the organization chart presented in Section 2.3.1a of this plan. These personnel, in collaboration with County DPW personnel, administer the City's sewer collection system operation, provide engineering evaluation of proposed and existing sewer facilities, administer preventive maintenance and sewer construction programs, and oversee the maintenance of the sewer collection system facilities and related records and plans.

#### 2.2 Authorized Representative

The City's Director of Public Works in concert with designated County DPW staff, are the authorized representatives who are responsible for the execution of compliance actions required under the WDRs. This includes, but is not limited to, execution and certification of all reports and correspondence as required under the Order.

#### 2.3 Organization Chart and Responsibilities

The organization chart, showing the structure and relationship of the City and the County DPW administrative, management and field positions relative to Sewer Operation and Maintenance (SO&M) is presented in Sections, 2.3.1a and 2.3.1b respectively and the descriptions of responsibilities and support are presented in Sections 2.3.2 and 2.3.3.

#### 2.3.1a City of Lakewood Organization Chart for Sanitary Sewer System Management



#### 2.3.1b SMD ORGANIZATION CHART



## 2.3.2 Description of Responsibilities - The description of responsibilities or roles of each position especially as related to SSOs are as follows:

• City Council - Responsible for establishing new and amending existing ordinances and policies governing the municipal operations, and the operations of the City's sanitary sewer system including the approving of all SO&M contracts and agreements to protect the community's interest.

• City Manager – Responsible for the overall management and application of all legal and policy directives that relate to the City's activities, including the operation and maintenance of the City's sanitary sewer system.

• Director of Public Works – Directs the accomplishment of statutory and policy criteria within the scope of the City Council's policy and legal requirements. Directs its execution, and evaluates work accomplished within his areas of responsibility, including the SO&M program. Also directs the planning, budgeting, design for the construction of new sewer collection system and rehabilitation of existing sewer collection system. Facilitates all sewer collection system operation and maintenance activities through the contract with LACDPW, as the City's representative on the Consolidated Sewer Maintenance District (CSMD). Responsible for the day-to-day management and operation oversight of the City's sewer collection system, including the one sewer pump station.

• Deputy Director of Public Works – Directs engineering and management activities relating to studies, design, investigations, and the preparation of reports, budget and contractual agreements with private firms for technical services projects. Performs special studies, investigations and reports concerning water and sewer infrastructure.

• Facilities & Maintenance Division - Has oversight of all in-house and contracted maintenance and repair services for City's facilities.

- Fleet Services Division Has oversight of all City vehicles, generators and small equipment.
- Hardscape and Tree Division Has over sight of all in-house and contracted hardscape and tree contracted maintenance throughout the City.
- Public Works Inspector Inspect, coordinate and facilitate with CSMD any local citizen issues relative to sewer service.

• Public Works Aide - Coordinates with CSMD and Los Angeles County Flood Control any local citizen issues relative to sewer and drainage issues. Works with Community Development on right of way issues. • Sr. Management Analyst - Assist in the preparation of reports, budgets, and other correspondence; provide public outreach; coordinate and facilitate of City and contract personnel in addressing local citizen issues relative to sewer service.

**2.3.3 City Divisions/Departments and Other Agencies** - Other Divisions or Departments within the City, and specific contracted services, are currently and will continue to be responsible for assisting in some of the compliance actions called for by the WDR's for the City. The key support units and their responsibilities are described below:

• Administrative Services Department - Responsible for procuring equipment and as needed contract services for emergency sewer repair projects, and for procuring material and supplies needed for the day to day operation and maintenance activities, and accounting services. Also responsible for investigating SSOs related claims and litigations against the city.

• Building and Safety Division – This function is performed by Los Angeles County Staff at Lakewood City Hall. Responsible for reviewing various building permit applications, their relationship to public easements and facilities, and issuing permits for sewer connections. Also the enforcement of the Plumbing Codes involving proper connection and discharge into the public sewer system and the property owner's maintenance of their respective sewer laterals between the structure served and the public sewer collection main. This

• Code Enforcement Division – Responsible for the enforcement of the Health and Safety Codes regarding waste disposal such as the investigation of cases of illicit discharge of chemicals, debris, etc. into the public right of way. This is undertaken in concert with the LAC DPW Environmental Programs Industrial Waste Unit.

• Engineering Division - This function is performed by Los Angeles County and City hired Engineering Contractors. Responsible for preparing plans and specifications for sewer construction and rehabilitation projects, and the administration of contracts for accomplishing such projects and emergency sewer repair projects. Also responsible for subdivision or development project plan checks to ensure compliance with the City's standards for construction of new sewer collection systems. Plan checks sewer capacity studies to size proposed sewer lines and sets requirements to ensure adequate capacity in existing systems. Prepares easement documents or identifies and procures access rights for public sewer facilities located within private properties.

• LAC DPW - The Sewer Maintenance and the Environmental Programs Divisions provide critical services needed for the City to address the required demands of the WDR. The Sewer Maintenance Division is responsible for operational maintenance services of the city's sewer collection system, including cleaning, closed circuit television (CCTV) inspection, manhole inspection, and minor urgency repairs. The Environmental Programs division is responsible for the implementing the City's industrial waste and FOG programs, which include permitting, inspection and enforcement of illicit discharges to the public sewer system in concert with Code Enforcement Division.

• Los Angeles County Fire Department – Responsible for assisting with protecting the public in the event of an SSO that expands into high use public travel ways and/or those that reach storm drains or water courses and spread the effect of public risk to health and safety impacts.

• Los Angeles County Sheriff's Department - Responsible for operating the Emergency Operation Center for the entire City including handling afterhours service calls reporting SSOs, and pump station malfunction calls and forwarding those reports to the LACDPW.

2.3.4 Chain of Communication for SSO Reporting - The chain of communication for CSMD reporting SSOs, from receipt of a complaint or other reliable information source to reporting to the appropriate regulatory agencies, is presented in Section 2.3.4a below. The city's contact directory for communicating with both internal and external parties involved in responding and reporting an SSO event is shown in Section 2.3.5. The SSO emergency response plan will be discussed in greater detail in Chapter 6 of this document.

#### 2.3.4a CSMD's SSO Reporting Procedures Flow Chart



#### 2.3.5 City's Contact Directory for SSO Responding and Reporting

After Hrs. or	Name	Telephone	After Hours or
Responsible Party's			Cell Phone
Lakewood Gatekeeper	24-hour	1-562-712-0948	1-562-712-0948
	On-call Public Works		
	Management Staff		
Director of Public Works	Lisa A. Rapp	1-562-440-2501	1-562-440-2501
Deputy Director of	Max Withrow	1-562-416-5971	1-562-416-5971
Public Works			
Sr. Management Analyst	Konya Vivanti	1-562-805-3527	1-562-715-1440
LA Co Sheriff Dept.	24-hour Dispatch	1-562-623-3500	
LA Co Fire Dept.	24-hour Dispatch	1-323-881-2401	
LA Co Dept. Pub. Wks.	24-hour Dispatch	1-626-458-4357	1-800-675-4357
LA Co. Health Dept.		1-213-974-1234	
LA Co. Flood Control		1-626-445-7630	
Dist.			
Co Sanitation Districts of		1-562-699-7411	
LA Co			
R.W.Q.C.B. (Region 4)		1-213-576-6600	
State O.E.S.		1-800-852-7550	

#### 3.0 LEGAL AUTHORITY

#### 3.1 Legal Authority

The City's legal authority to own and operate a sanitary sewer system is derived from its incorporation as a City. The City on April 16, 1954, granted the County of Los Angeles the consent and jurisdiction to annex sewered portions of the City into the CSMD. By that action, the City has entrusted the management, operation, and maintenance of its local sanitary sewer system to the CSMD. The City, however, still maintains full ownership of the sewer system.

In compliance with the WDR, this Chapter highlights the City's legal authority to: 1) prevent illicit discharges into the sanitary sewer system; 2) require that sewers and connections be properly designed and constructed; 3) ensure access for maintenance, inspection, or repairs; 4) limit the discharges of FOG and other debris that may cause blockage; and 5) enforce any violation of sewer ordinances or City Municipal Codes (CMC). The legal authorities for the specific areas stipulated in the WDRs are covered in various sections of the City Municipal code and Chapters 20.20, 20.24, 20.22, 20.32, 20.36, and 20.40 of the LACO Code some of which are discussed below:

3.1.1 Legal Authority to Prevent Illicit Discharges into the Sanitary Sewer System - In accordance with the City's Municipal Code, Chapter 1, Section 8100, the City has adopted the 2008 Edition of Title 28 of the Los Angeles County Plumbing Code, which incorporates most provisions of the California Plumbing Code, as its plumbing code. Per Ordinances 39 and 196 of the CMC, the City has also adopted Title 20 – Utilities of the Los Angeles County (LACO) Code, which regulates sanitary sewers and industrial waste in the County, as its Sanitary Sewer and Industrial Waste use Ordinance. The LACO Plumbing Code Title 28, Sections 306.2, 714.2, and 1101.2 prohibits the unauthorized discharge of rain, surface or subsurface water (inflows) into the collection system. LACO Code – Title 20, Section 20.36.010, prohibits the illegal dumping of offensive or damaging substances such as chemicals, debris, etc. Other Sections of the code that prohibit various forms of illicit discharges are 20.24.020, 20.24.200, 20.32.080, 20.32.650, etc. The City, as one of the CSMD cities, benefits from the districts Infiltration/Inflow (I/I) control program. This program consists of sewer line cleaning and maintenance program, which includes closed circuit television (CCTV) and other mechanisms to detect I/I. By ordinance LACO Title 20, Section 20.40.045, the Los Angeles County Board of Supervisors has established a financial plan to ensure capital replacement or rehabilitation of sewer lines prone to I/I within the CSMD. The LACO Title 20, Section 20.24.080. requires that property owners be responsible for maintenance of their house laterals, including the elimination of cracks, tree roots, and other debris. These laws combined constitute the City's legal authority to prevent illicit discharges into the sewer system.

- **3.1.2 Legal Authority to Require that Sewers and Connections be properly Designed and Constructed -** The LACO Code Title 20, Sections 20.32.330 and 20.32.340 as adopted by the City, require that the design of new main-line sewers and pumping plants respectively in the City, comply with Part 3 of Chapter 20.32 of the Code. Section 20.32.350 of the Code requires that the design of new house laterals also conform to the requirements of Part 3, Chapter 20.32 of the Code unless otherwise covered by the LACO Plumbing Code Title 28. In accordance with LACO Code Title 20, Section 20.32.580, the construction of a collection sewer system is required to conform to all the requirements prescribed by Division 2, of the LACO Code, the Standard Specifications for Public Works Construction ("Green Book") and by the Special Provisions and Standard Plans, all on file in the office of the City Director of Public Works. The inspection of new main-line sewers and pumping plants to ensure proper construction is covered under Section 20.30.590 of the LACO Code and also regulated under the CMC.
- **3.1.3 Legal Authority to Ensure Access for Maintenance, Inspection, or Repairs -**The LACO Code – Title 20, Division 2, as adopted by the City gives the City the legal right to set requirements to allow unrestricted maintenance access to the public sewer infrastructure located in private property. In accordance with Section 20.32.430 of the LACO Code, the access is secured through City's enforcement of the requirement for legally recorded sewer easements around all public sewer appurtenances located in private properties. Sewer easements are detailed on the sewer construction plans and are thoroughly reviewed by the City and the County for adequacy in size and accuracy of alignment during the plan check process. Plan checkers take special care to ensure that maintenance crews will have sufficient access for the movement of equipment and materials for either routine and emergency repair or construction work on the system.
- **3.1.4 Legal Authority Limiting the Discharge of FOG and other Debris that may cause Blockage** - The City by adopting the LACO Plumbing Code - Title 28 and the LACO Code - Title 20, has the legal authority to satisfy this element of the WDR. The LACO Plumbing Code - Title 28, requires the installation of grease interceptors at restaurants and other food establishments that generate grease in the City. Section 714.1 of the Plumbing Code prohibits the discharge of FOG and other substances that may, among other things, clog, obstruct, fill, or necessitate frequent repairs, cleaning out or flushing of sewer facilities, in the City's Sewer System. This prohibition is also contained in the LACO Code – Title 20, Section 20.36.400. The LACO Code - Title 20, Section 20.36.560 gives the City Director of Public Works the authority to require the installation of treatment facilities, including grease interceptors, at any facility that generates FOG in the amount that will damage or increase the maintenance costs of the sewer collection system.
- **3.1.5 Legal Authority to Enforce any Violation of Sewer Ordinances** The LACO Code, Section 20.24.090 gives the City Director of Public Works the legal authority to inspect main-line sewers, sewage pumping plants, interceptors etc.,

as often as he deems necessary, to ascertain whether such facilities are maintained and operated in accordance with the provisions of Division 2 of the LACO Code.

Under 20.24.100 of the LACO Code, the City Director of Public Works is empowered to enforce all the requirements prescribed in Division 2 – Sanitary Sewers and Industrial Waste of the Code and in accordance with Section 20.24.110 may delegate this authority. The LACO Code, Section 20.24.160 allows criminal penalties for any violations of the Sewer and Industrial Waste Ordinances.

The Codes, standard plans, specifications and other material cited in this Chapter are filed at the Office of the City's Director of Public Works.

#### 4.0 OPERATION AND MAINTENANCE PROGRAM

#### 4.1 **Preventive Maintenance Program**

The City is within the CSMD, and therefore depends totally on the CSMD for the operation and maintenance of its collection sewer system. The CSMD's Operation and Maintenance programs applied district-wide and described in details in the SMD SSMP are applicable in the City. The CSMD Central Maintenance Yard (See Appendix B) located at 12015 Shoemaker Avenue, in the City of Santa Fe Springs provides sewer services to the City. However, personnel from the other four sewer maintenance yards also shown in Appendix B, provide after hour services to the City such as Stand-by, callback, and other sewer emergency services. The maintenance equipments utilized within the City are owned by the CSMD. A complete inventory of the CSMD equipments assigned to the Central Maintenance Yard is presented in Appendix C.

The City's maintenance programs are funded through levying of an annual sewer service charge currently at \$32.5 per equivalent single-family dwelling unit otherwise called a sewage unit (s.u.). This is included in the \$40.5 per s.u. levied by the CSMD and collected with the annual tax bills of property owners in the City that are within the CSMD. The total annual revenue generated for the various sewer programs through the \$40.5 per s.u. charge is approximately \$1,011,750.00. These funds are managed and administered by the County and reviewed and adjusted annually to raise sufficient revenues for the maintenance programs.

The following is a summary of the CSMD preventive maintenance activities implemented by the District within the City:

- 4.1.1 **Sewer Line and Manhole Inspection** The interior and exterior of manholes are inspected semi-annually for any structural defects, sewage flow condition, presence of vermin or rodents, deleterious industrial waste, odors and any signs of unusual settlement around the manholes and along sewer alignments.
- 4.1.2 **Gas Trap Manholes and Siphons** On a monthly basis, these facilities are inspected and cleared of any stoppages or flow restrictions.
- 4.1.3 **Drop Manholes** These facilities are inspected and cleared of stoppages and flow restrictions on variable frequencies based on prior inspection records.
- 4.1.4 **Sewer Line Cleaning** Sewer lines are cleaned by hydro jet or rodding. Frequency of cleaning is based on inspection records. Sewer lines known to accumulate grease, garbage grinds or sand are put on monthly, quarterly, or semi-annual cleaning schedule and those prone to root growth are periodically rodded or chemically treated.

- 4.1.5 **Vermin and Rodent Control** Sewers infested by insects are chemically treated. Those infested by rodents are baited.
- 4.1.6 **Sewage Pump Stations** All pump stations are equipped with telemetry/alarm system and are inspected twice a week. Pumps and motors are lubricated, control mechanism and valves are checked and adjusted as necessary, and equipment is repaired or modified as required.
- 4.1.7 Work Scheduling CSMD work orders within the City are generated and tracked by the LAC DPW's Maintenance Management System (MMS). CSMD field crews activities are recorded in various forms such as service requests, cleaning reports, sewer maintenance daily reports, manhole adjustments, overflow report forms etc. and finally stored in the MMS. The reports are made available to the City upon request.
- 4.1.8 City Sewer Mapping System The City maintains as-built plans of City's sewer facilities. Data on the plans, such as system location and alignment, pipe material, size etc, are also stored in the SMD Computer Aided Design Drafting (CADD) system. Information generated by the CADD is printed on Index Map Sheets stored by LAC DPW, Sewer Maintenance Division, located at 1000 South Fremont Avenue, Alhambra, California. The Index Maps are also kept at the SMD Field Maintenance Yards. The maps are updated, as necessary, to reflect any changes in the system.

#### 4.2 Rehabilitation and Replacement Plan

The City's sewer collection systems are in the CSMD, and the City participates in the District's Accumulative Capital Outlay Program. As a result, the City also benefits from the District's Sewer Condition Assessment Program.

**4.2.1** Accumulative Capital Outlay Program of the CSMD - As stated above, the City participates in the ACO program of the CSMD. Property owns within the CSMD are levied an annual charge of \$4.00 per s.u. for sewer collection system rehabilitation and replacements. The \$4.00 per s.u. charge is also a component of the total \$40.5 per s.u. annual sewer service charge collected from property owner's district-wide and collected with property owner's annual Tax Bills. The program is managed and administer by the LAC DPW.

Under the ACO program, any portion of the sewer system found to be structurally deficient through routine inspection, sewer emergency response or the Condition Assessment Program is immediately repaired as an emergency repair project, or documented in a prioritized list of future short and long-term ACO sewer rehabilitation and replacement project. However, LAC DPW would refer portions of the system that have sewer capacity related problems especially hydraulic deficiencies resulting from over development or change in the zoning of any portion of the City to the City for appropriate corrective action. There are

currently no known capacity related SSO problems in the City. A detailed discussion of the CSMD ACO Program is contained in Chapter 4.2.1 of the SMD SSMP.

**4.2.2 Condition Assessment Program** - There is currently about 166 miles of sewer lines and three pump stations within the City. The existing City collection sewer facilities are listed in Appendix D. The existing sewer pipes, ranging from 8 to 12 inches in diameter, are predominantly of vitrified clay pipe material. Naturally, as these sewer lines age, structural problems such as cracks, joint separation, root intrusion, etc. will develop. To ensure that these problems are properly mitigated, the WDR requires that the City has a program in place to minimize and correct them and that the program is well funded.

As mentioned earlier in this document, the City is within the CSMD and participates in the CSMD's ACO/Condition Assessment Program. Property owners within the CSMD are assessed an annual fee of \$4.00 per s.u. for sewer system condition assessment. This charge is part of the current annual sewer service charge of \$40.5 per s.u. levied and collected with property owners annual Tax Bills for the CSMD. This charge is reviewed and adjusted annually by the County to raise sufficient funds for the Condition Assessment Program. Under this program, the entire Sewer Collection System within the City will be inspected by Close Circuit Television (CCTV) to assess the condition of the pipes on a ten year circle basis. The CCTV inspection schedule for the City is presented in Appendix E of this document. The County DPW is responsible for the management and administration of the funds and program.

#### 4.3 Equipment Maintenance and Replacement Policy

The equipment utilized in the maintenance of the City's sewer facilities is owned by the CSMD. The LAC DPW has full responsibility for the maintenance and replacement of this equipment. The LAC DPW Equipment Replacement Policy is described in Chapter 4.3 of the SMD SSMP.

#### 4.4 Training for Field Operations Personnel and Contractors

All personnel needed for the operation and maintenance of the City's sewer system are employed by the LAC DPW. The training of CSMD personnel is a function of the County and not the City. The training methodologies utilized by the County are contained in Chapter 4.4 of the SMD SSMP. The City does not have any formalized training for contractors doing work within the City. However, City's sewer construction projects are awarded to carefully selected contractors with well trained and qualified personnel for any give project. The designed plans and specifications for City's sewer construction projects contain detailed instructions, on City's permitting requirements, standards and policies that must be adhered to by contractors doing work within the City.

#### 5.0 DESIGN AND PERFORMANCE PROVISION

#### 5.1 Design and Construction Standards and Specifications

The City requires that all sewers be designed in accordance with Los Angeles County standards. The County DPW has Standard Plans and Specifications for Construction of Sanitary Sewers and appurtenances to ensure that sewer lines and connections are properly designed and constructed. The County DPW specifications by reference incorporate the Standard Plans and Specifications for Public Works Construction, Special Provisions, and Standard Drawings. In addition, County DPW has other publications such as the Private Contract Sanitary Sewer Procedural Manual, Guidelines for the Design of Pump Stations etc. to ensure consistency in the design of collection systems within unincorporated County areas. The City requires that these publications also be followed in the design of sewer system within the City. To further assure that sewer facilities are properly designed and constructed, City requires that plans are designed by licensed engineers and provides thorough review of plans, by City and SMD, prior to approval for construction and inspection of the actual construction work. The SMD plan review is from stand point of maintenance only.

# 5.2 Procedures and Standards for inspection and Testing New and Rehabilitated Collection Sewer Facilities

The City provides inspection by outsourcing to a qualified consultant for the inspection of new sewer construction projects. The inspection of sewer rehabilitation projects under the ACO program are conducted by County DPW inspectors. City requires that "As-Built" sewer plans of the completed projects be submitted prior to final approval for acceptance of sewer facilities for public use.

In compliance with SMD policy, the City also requires that all newly constructed pumping stations be inspected by experienced SMD staff prior to transferring such facilities to SMD for maintenance.

#### 6.0 OVERFLOW EMERGENCY RESPONSE PLAN

#### 6.1 Overflow Response Procedure

The City, as a member of the CSMD, relies on the services of SMD for sanitary sewer overflows within the City. Therefore, the SMD Overflow Procedure described in Chapter 6, of the SMD SSMP is utilized by the District in the City. Furthermore, the County DPW 24-hour emergency phone number 1-800-675-HELP (4357) is readily available to City staff and residents to use in promptly notifying County DPW staff of SSO events in the City.

**6.1.1 Regulatory Agencies Notification and Time Frame** - The SMD is responsible for reporting of SSOs' to appropriate regulatory agencies for the City. As discuss in Chapter 2, SSOs that occur in the City are reported to the County by telephone or by telemetry at the pump stations. Upon receipt of such call, County Officials follow the notification guidelines contained in Chapter 6 of the SMD SSMP also presented in Section 6.1.1a and 6.1.1b of this document.

#### 6.1.1a Regulatory Agencies Notification and Time Frame

SSO Category	Type or Description	Agencies to be Notified	Type of Notification and Timeframe					
			Telephone/Fax	Written Report/*Online Database				
1	<ul> <li>A. SSO ≥ 1,000 gallons</li> <li>B. Results in discharge to drainage channel and/or surface water</li> </ul>	Health Department Flood Maintenance Division	As soon as possible, but no later than 2 hours after becoming aware of the spill. As soon as possible, but no later than 2 hours after becoming aware of the spill.	NA				
	C. Discharge to a storm drainpipe and not fully captured and returned to the sanitary sewer system	RWQCB (Region 4 or 6) OES	As soon as possible, but no later than 2 hours after becoming aware of the spill. As soon as possible, but no later than 2 hours after becoming aware of the spill.	Certify that the notification has been made ASAP, but no later than 24 hours after becoming aware of the spill. NA				
		SWRCB	As soon as we become aware of the SSO, reporting is possible and can be provided without substantially impeding cleanup or other measures.	Online Initial Report - ASAP but no later than initial 3 business days after we are made aware of it. Final Online Certified Report – Within 15 calendar days on conclusion of the SSO response and remediation. Additional Information – Anytime in form of an attachment.				
2	All other SSOs resulting from SMD sanitary sewer system	Health Department RWQCB (Region 4) OES RWQCB (Region 6) SWRCB	Same as above Same as above Same as above Same as above N/A	NA Same as above NA Same as above <b>Online</b> – Within 30 days after the end of the calendar month in which the SSO occurred.				
3	Private lateral sewage discharge caused by blockages or other problems within a privately-owned lateral	Health Department SWRCB (optional) OES RWQCB (Regions 4 and 6)	Same as above NA Same as above Same as above	NA NA NA Same as above				
NA	No SSO in a calendar month	SWRCB	NA	<b>Online Database Certified</b> – Within 30 days after the end of the calendar month, certified statement that no SSO occurred.				

\*If SSO database is not available fax required info to the appropriate RWQCB but enter info into online database as soon as practical.

#### 6.1.1b Agencies Telphone/Fax Numbers

Agency	Contacts	Hours of Operation
County Health Department	(213) 974-1234	Answered on a 24-hour, 7-day basis
State Office of Emergency Services	1-800-852-7550	Answered on a 24-hour, 7-day basis
Los Angeles Regional Water Quality Control Board (Region 4)	(213) 576-6600 (213) 576-6650	Answered only during normal working hours
Flood Maintenance Division East area	(626) 445-7630 (626) 798-6761	Answered only during normal working hours
South area	(562) 861-0316	Answered only during normal working hours
West area	(818) 896-0594 (818) 248-3842	Answered only during normal working hours
State Water Resource Control Board	Online database website address	

- 6.1.2 Procedure to ensure that Staff and Contractors are Aware and are appropriately trained to follow Emergency Response Plan This is mainly the function of the County DPW. City staff however is familiar with the SMD Emergency procedures which is included in the SMD SSMP.
- 6.1.3 Procedure to Address Emergency Operations such as Crowd Control and other Necessary Response Activities The City does not play a significant role in this function. It is performed by County DPW Staff or Contractors doing emergency repair SSO related work for the County or the City. The County Fire and County Sheriff departments also play active roles in the control and protection of the general public during emergency SSO operations.
- 6.1.4 Program to Eliminate or Minimize the Discharge of SSO into the waters of the United States This is one of the main functions performed by the County DPW for the City. The roles played by the City are limited to ensuring that the City's collection system has sufficient capacity for all operating conditions and making sure that the County DPW staff is promptly notified of SSO events when they do occur.

#### 7.0 FOG CONTROL PROGRAM

#### 7.1 Public Education Outreach Program

The City currently benefits from the County DPW Public Education Outreach Program. Under this program information on proper disposal of FOG and other SSO prevention measures such as the installation of backwater valves, house lateral maintenance etc. is disseminated to CSMD City residents through publication of Annual Reports, brochures and individual notices to property owners. County DPW Sewer Maintenance and Industrial Waste management program personnel also assist in passing useful information on SSO prevention and FOG on to home and business owners. County DPW. in addition. has the Annual Reports posted on its home web page (http://dpw.lacounty.gov/smd/smd/) for easy access to all.

To complement County efforts, the City will initiate its own Public Education Outreach Program. This will consist of including SSO and FOG related articles from County DPW and other sources in City newsletters and City webpage <u>www.lakewoodcity.org</u> and by maintaining continuous communication with the County, City residents and other stakeholders on these and other issues.

# 7.2 Disposal Methods for FOG Generated within the City's Sanitary Sewer System

This function is performed by the CSMD staff on behalf of the City. The methods used by County DPW are contained in the SMD SSMP.

# 7.3 The Legal Authority to Prohibit Discharges to the System and Identify Measures to Prevent SSOs and Blockages Caused By FOG

The legal authority to prohibit discharges of FOG into the sewer system is discussed in Chapter 3 of this document. Requirements for grease interceptors at food establishments to prevent the discharge of grease to the collection sewer system and educating the public on proper disposal methods for FOG are also discussed elsewhere in this chapter.

# 7.4 Requirement to Install Grease Removal Devices, Design Standards for Grease Removal Devices, Maintenance Requirements, BMP Requirements; Record Keeping and Reporting Requirements

The County DPW, under a separate agreement (Appendix F) with the City, is charged with the responsibility of enforcing the County's Sanitary Sewers and Industrial Waste Ordinance in the City. The Industrial Waste Program of the County is managed by the Environmental Programs Division of County DPW. The design standards for grease removal devices and the requirement imposed on industrial waste facilities that discharge waste or FOG into the City's sewer system are similar to those imposed in the Unincorporated County and as presented in Chapter 7.4 of the SMD SSMP.

# 7.5 Authority to Inspect Grease Producing Facilities, Enforce Authorities, and Evidence of Adequate Staffing To Inspect and Enforce the FOG Ordinance

The LACO Code, Section 20.24.090, as adopted by the City, gives the City Director of Public Works the authority to inspect grease producing facilities for compliance with permit requirements. There are approximately 143 facilities holding Industrial Waste Permits in the City. In accordance with the aforementioned agreement, the County DPW is responsible for issuing the permits and for the inspection of these facilities for compliance with terms of their permit. County DPW in concert with the City Director of Public Works is also responsible for the enforcement of all industrial waste permit and Code violations in the City.

#### 7.6 Cleaning Schedule for Identified FOG Prone Sewer Segments

This function is performed by the CSMD for the City. The methods used by CSMD staff are described in the SMD SSMP.

#### 8.0 SYSTEM EVALUATION AND CAPACITY ASSURANCE PLAN

#### 8.1 System Evaluation and Capacity Assurance

The City is responsible for ensuring that the public sewer infrastructure is correctly designed, adequately sized and easily maintainable. The CSMD also provides a supporting role in reviewing all proposed sewer plans for new developments in the City to ensure that they conform to County design standards and particularly to ensure that district's requirements for acceptability for maintenance.

#### 8.2 Adequate Capacity and Correct Design

The City utilizes the services of a qualified consultant to provide a thorough review of all sewer plans for proposed development projects in the City to ensure that: 1) they are properly designed with sufficient capacity for current and future base, peak and wet weather flow demands; and 2) any impact of proposed project on existing sewer system is mitigated prior to being approved by the City. During construction, the projects are continuously inspected by the Public Works Inspector or a hired construction inspector to ensure that the sewer facilities are constructed in accordance with the approved plans and specifications.

#### 8.3 Capacity Enhancement Plan

The collection sewer system capacity enhancement program is a combined effort of City and County DPW. The CSMD programs to optimize the use of available sewer capacity and preventing SSO include the CCTV program to identify pipe segments needing repairs or with I/I or tree root intrusion problems, sewer cleaning program and the ACO program to effect repairs or replacement of damaged pipes. These programs are described in Chapters 3 and 4 of the SMD SSMP. The City's plan to complement County's efforts is through its Capital Improvement Program. Pipe segments identified to be deficient, through a city sewer capacity study, will be prioritize for orderly upgrade utilizing city's sewer funds.

#### 9.0 MONITORING, MEASUREMENT, MODIFICATION PROGRAM

#### 9.1 Monitoring

The City will document all relevant data on SSOs that occurred in the City. These will include the quarterly SSO reports from County DPW, Annual Reports publish by County DPW, Sewer Maintenance Productivity Report (Appendix G) for the City and any special reports to regulatory agencies etc. The data will be analyzed to evaluate the effectiveness of the City's SSMP.

#### 9.2 SSMP Program Effectiveness Evaluation

The evaluation of the City's SSMP Program Effectiveness shall be based on such key performance indicators (Appendix H) as the total number of overflows, overflow response time, reduction in repeated incidents of SSO at some location, total overflow equal to or greater than 1,000 gallons or reaching the waters of the United States and reduction in number of overflows that are caused by sewer capacity-related problems.

#### 9.3 Program Modification

The City shall continually update or modify the key elements of its SSMP based on the results of the above mentioned monitoring and program effectiveness evaluations. The City shall also make recommendations to the County, as necessary, on elements of the SMD SSMP to be adjusted or revised within the City boundaries to better serve its residents.

#### 9.4 SSO Location Mapping and Trends

The annual SSO location maps prepared by County DPW are enclosed in Appendix I. The cause of each SSO incident is also recorded and shown on the map sheets. These maps are used for establishing SSOs pattern, identifying hot spots and for work assignment scheduling by County DPW field personnel.

#### 9.4.1 Location Map

**9.4.2 Mapping of SSO Frequencies** - The monthly numbers of SSOs charts and graphs prepared by County DPW are presented in Appendix J. The graphs are used for identifying SSO trends and to evaluate overall program effectiveness. The charts are used to identify SSO trends and as an indicator of possible Infiltration/Inflow problem.

#### **10.0 SSMP PROGRAM AUDIT AND CERTIFICATION**

#### **10.1 SSMP Program Audit**

The City shall conduct an internal audit and prepare a report every two years. The audit shall focus on evaluating the effectiveness of the SSMP and records of City and SMD's compliance actions during the audit period. The most recent report of the audit will be kept on file in the City's Public Works Department.

#### **10.2 SSMP Certification**

The SSMP shall be certified by the Lakewood Director of Public Works or authorized representative to be in compliance with the requirements set forth in the WDR's and be presented to the City Council for approval at a public meeting. The City authorized representative must also complete the certification portion in the Online SSO Database Questionnaire (http://ciwqs.waterboards.ca.gov/) by checking the appropriate milestone box, printing and signing the automated form and sending the signed form to

State Water Resources Control Board Division of Water Quality Attn: SSO Program Manager P.O. Box 100 Sacramento, CA 95812

#### **10.3 SSMP Modification and Re-certification**

The SSMP must be updated every five years to keep it current. When significant amendments are made to any portion or portions of the SSMP, it must be resubmitted to the City Council for approval and re-certification. The re-certification shall be in accordance with the certification process described in Section 10.2 above.

#### 11.0 COMMUNICATION AND SSMP AVAILABILITY

#### **11.1 Communication**

The City shall provide all stakeholders and interested parties such as the general public and other agencies, with status updates on the development and implementation of the SSMP and consider comments made by them. The City shall utilize media such as letters, newsletters, brochures, notices in newspapers, and the City's home web page for conveying this information.

#### **11.2 SSMP Availability**

Copies of the SSMP will be maintained in the City's Public Works Department and posted on the City's home web page. The document shall also be made readily available to the Regional Water Quality Control Board (Regions 4) upon request and to the operators of any collection system or treatment facility downstream of the City's system.

#### 12.0 CSMD AND CITY RESPONSIBILITIES UNDER THE WDR

#### **12.1 CSMD Versus City Responsibilities**

The CSMD and the City which is a part of the CSMD will play significant roles, jointly and separately, towards attaining the goals of the WDRs. LAC DPW shall apply for coverage under the WDR for facilities it owns. The City will apply for coverage for its own facilities.

LAC DPW shall prepare a comprehensive SSMP for the SMD. The City with coordination with LAC DPW, will prepare its own SSMP. The City has previously adopted Codes and regulations providing it with the legal authority in conjunction with agreements with the SMD to enforce items stipulated in the WDR's.

Section 12.2 shows the CSMD Cities including the City of Lakewood and the SSO related services currently provided by LAC DPW to each of the cities. It also contains information on estimated population of the cities. The CSMD shall perform all functions under the WDRs related to the operation and maintenance program. CSMD shall also be responsible for conducting structural deficiencies under the ACO program. Cities will be conducting the capacity study of their collection systems, if necessary, and correcting identified hydraulic deficiencies. The matrix on section 12.3 is a listing of the Key elements of the SSMP and the roles for the CSMD and the City. By completing and signing this matrix, the city, as owner, and the CSMD, as service provider, mutually agrees that it is an accurate description of what each entity will be responsible for under the WDRs. Upon approval by both parties, this document becomes a part of the City's and SMD SSMP.

#### 12.2 County of Los Angeles Department of Public Works

#### Sewer Related Services to the 42 CSMD Cities

City	CSMD	Accumulative Capital Outlay Program	Sewer Maintenance Agreement	Building and Safety	Industrial Waste	City Engineers	*Population
Agoura Hills	Х	X			Х		20,537
Artesia	Х	Х		х	Х		16,380
Baldwin Park	х	Х					75,837
Bell Gardens	Х	Х			Х		44,054
Bellflower	х				х		72,878
Bradbury	х	x					855
Calabasas	х	x			Х		20,033
Carson	х	x		х	х	х	89,730
Commerce	х	x		х	Х	Х	12,568
Cudahy	X	X			X		24,208
Diamond Bar	х	x			x		56,287
Duarte	X	X		х	X		21,486
Glendora	X	X					49,415
Hawaiian Gardens	<u>х</u>	X			x		14,779
Hidden Hills	<u>х</u>	X			~		1,875
Industry	X X	x		X			777
Irwindale	X	X	X	X	x		1,446
La Canada Flintridge	Х	x	~	X	X		20,318
La Habra Heights	X X	x		^	^		5,712
La Mirada	<u>х</u>	X		X	x	Х	46,783
La Puente				^		^	40,703
Lakewood	X	X		× ×	X	~	79,345
	X	X		Х	X	Х	
Lancaster	X	X					118,718
Lawndale	X	X		X	X		31,711
Lomita	Х	X		X	X	Х	20,046
Malibu	Х	X					12,575
Palmdale	Х	X			Х		116,670
Palos Verdes Estates	X	X					13,340
Paramount	Х	X			Х		55,266
Pico Rivera	Х	X			Х		63,528
Rancho Palos Verdes	Х	X			Х		41,145
Rolling Hills	Х	X		Х			1,871
Rolling Hills Estates	Х	Х		Х	Х		7,676
Rosemead	Х	Х			Х		53,505
San Dimas	Х	Х			Х		64,980
Santa Clarita	Х	Х			Х		151,088
Santa Fe Springs	Х	Х		Х			17,438
South El Monte	Х	x					21,144
Temple City	Х	x		x	х	Х	33,377
Walnut	Х	х			Х		30,004
West Hollywood			х		Х		35,716
Westlake Village	Х	Х		х	Х		8,368
TOTALS:	40	39	2	16	31	6	1,614,532

\* The population data was obtained from the year 2000 Census data. Individual Cities should verify the accuracy of the above data.

Through the General Services Agreement, a City can request County Resources upon specific request. Public Works currently provides at least some degree of services to all 88 cities in Los Angeles County.

#### 12.3 ROLES FOR THE CONSOLIDATED SMD AND CITIES UNDER THE WASTE DISCHARGE REQUIREMENTS

	Α	В	С	D	E	F	G
1	Task	WDR	Description or Requirement of the WDR	Completion Date	City of	County	Comments/Concerns
2	Identifier	Reference		w/ MOU	Lakewood	Consolidated	
3				Regional Board 4			
4				10,000 - 100,000 served			
5							
6		D9	Allocate Adequate Resources		Х	Х	City for capacity related CIP, County for O&M & ACO
7		D9	Establish proper rate structure		Х	Х	
8		D9	Establish proper accounting mechanisms		Х		
9		D9	Establish audit procedures		Х		
10							
11		B1	Apply for coverage under WDR with SWRCB	11/2/2006	Х	Х	City as owner, County as operator
12		G	Reporting Program Initiation	1/2/2007	Х	Х	
13		B2	SWRCB to issue application instructions	7/2/2006	Х	Х	
14		B2	Appoint legally Authorized Representative		Х	Х	
15			Submit Completed Application Package		Х	Х	
16							
17		D13	Sewer System Management Plan				
18			Complete Development Plan & Schedule	11/2/2007	Х		
19			Certification	5/2/2009	Х		County support role only
20			Approval by Governing Board	5/2/2009	Х		
21			Available at office or on internet	5/2/2009	Х		
22							
23		D13(I)	Goal	11/2/2007	Х		
24		D13(ii)	Organization	11/2/2007	Х		
25			Identification of Authorized representative		Х	Х	
26			Organizational Chart		Х		
27			Contact List		Х	Х	
28			SSO Reporting Chain of Communication		Х	Х	
29		D13(iii)	Legal Authority	5/2/2009	Х	Х	
30			Sewer System Use Ordinance Adoption		Х	Х	
31			Service Agreement or MOU or other legally binding procedure		Х	Х	
32							
33							
34		D13(iv)	Operations and Maintenance Program	5/2/2009		Х	CSMD City
35			Up-to-date Mapping Procedures		Х	Х	
36			Description of routine O&M activities			Х	
37			Preventive Maintenance Program			Х	
38			Rehabilitation and Replacement Program		Х	Х	
39			Short-term		Х	Х	
40			Long-term		Х	Х	
41			Capital Improvement Plan		Х	Х	
42			Project Schedules		Х	Х	

43		Schedule for funding		Х	Х	
44		Training		Х	Х	City support role – spill containment and public education outreach
45		Develop training program			Х	
46		Staff			Х	
47		Contractors		Х	Х	
48		Equipment & Replacement Part Inventory Definition			Х	
49						
50	D13(v)	Design and Performance Provisions	8/2/2009	Х	Х	City for new and capacity related CIP
51		Development of design and construction standards		Х	Х	City for new and County for rehab projects
52		Development of inspection and testing standards		Х	Х	
53						
54	D13(vI)	Overflow Emergency Response Plan	5/2/2009	Х	Х	
55		Adoption of Proper Notification Procedures			Х	
56		Program for Appropriate Response Procedure		Х	Х	
57		Procedures for Prompt Notification			Х	
58		Contractor & Staff verification procedure & drills		Х	X	
59		Procedures for emergency operations communication		Х	Х	
60		Reasonable steps program to contain and prevent SSO		X	X	
61		, r.J.				
62	D13(vii)	FOG Program	5/2/2009			City covered by County I.W. Program
63		Implementation Plan and Schedule for Public Education Outreach Program		Х	Х	
64		Disposal Plan of FOG from the sewer system			Х	
65		Definition of legal authority		Х	Х	
66		Grease removal device requirements		Х	Х	
67		Inspection Authority		Х	Х	
68		Inspection authority definition		Х	Х	
69		Identification of grease problems areas			Х	
70		Development of source control measures		Х		
71		Public Education Outreach Program		Х	Х	
72	D13(viii)	System Evaluation and Capacity Assurance Measures	8/2/2009	Х	Х	
73		Evaluations		Х	Х	
74		Design Criteria		Х		
75		Capacity Enhancement Measures		Х	Х	
76		Schedules		Х	Х	
77		Capital Improvement Program		Х	Х	
78						
79	D13(ix)	Monitoring, Measurement and Modification	8/2/2009		Х	
80		Development and Management of Changed Provisions				
81						
82	D13(x)	SSMP Program Audits	8/2/2009	Х	Х	
83		Preparation of Biannual reports (minimum)		Х	Х	
84						
85	D13(xi)	Communication Program	8/2/2009			
86		Conduct Public Hearings		Х		City's program to complement County
87		Prepare Public Outreach Pieces		Х	Х	
88		Coordinate with LA San Distr. / L.A. CO. Communication Plans			Х	

89						
90	D14	SSMP Approval by Governing Board	7/28/2009	Х		
91						
92	D14	Update SSMP (every 5 years)	5/2/2014	Х	Х	County support role
93		Complete the online SSO Database Questionnaire		Х		
94		Certify Compliance		Х		
95		Governing Board re-certification & approval		Х		
96						
97	G	Monitoring and Reporting Requirements	1/2/2007	Х	Х	
98	G3	Obtain SSO Database Account (CIWQS)		Х	Х	
99	G3	Complete Collection System Questionnaire	w/in 30 days	Х		
100	G3	Update Collection System Questionnaire annually		Х		
101						
102	G3	SSO Recordkeeping	5 years from date	х	Х	

City Authorized Representative:	Konya Vivanti		7/28/14
	Print Name	Signature	Date

SMD Authorized Representative:			
-	Print Name	Signature	Date