

APPENDIX Y

Audit Closeout Memo

Revision History			
Revision	Date	Approval	Reason
0	12/19/11		Original
1	05/19/16	M. Esquer	• Addressed 2013 Audit Findings
2	06/30/16	M. Esquer	• Addressed 2015 Audit Findings
3	08/23/21	T. Meregillano	• Addressed 2021 Audit Findings
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DATE: August 19, 2021

SUBJECT: 2021 SSMP Audit Closeout Memo

On April 13, 2021, the Orange County Sanitation District (OC San) received the audit findings from an independent auditing firm, EEC Environmental, of the Sewer System Management Plan (SSMP). The audit reviewed the period between January 1, 2019 and December 31, 2020 and found OC San to generally be in compliance with all Provisions of the SSS WDR Order. The table below summarizes the findings:

Major Non-Conformances	0
Minor Non-Conformances	3
Recommended Corrective Actions	3
Recommended Enhancements	12

All minor non-conformances findings have been corrected or adopted. Several recommended corrective actions and recommended enhancements were suggested. Staff have reviewed these items at the receipt of the Audit report. The following section summarizes OC San’s response and action for each finding. For additional information on the referenced regulatory section and corrective action completion date, a more detailed spreadsheet is available.

Minor Non-Conformances

1. The Capital Improvement Plan is not referenced in the OC San SSMP Vol 1.

OC San has added a reference to the Capital Improvement Plan in Section 5.3 of the SSMP on August 12, 2021.

2. Staff do not have mapping access to storm drain conveyance systems in the service area.

OC San has included the storm drain GIS into the OC San mapping system on May 1, 2021.

3. All nonconformances identified in the 2019 SSMP Audit were not addressed.

OC San Environmental Services continues to track progress for all nonconformances in the 2019 SSMP audit. Completion date for this is contingent upon the 2019 audit findings completion.

Recommended Corrective Actions

1. Add a reference to the Capital Improvement Plan in Section 5.3 of the OC San SSMP Vol 1.

OC San has added a reference to the Capital Improvement Plan in Section 5.3 of the SSMP on August 12, 2021.

2. Add a storm drain systems layer to the GIS mapping system.

OC San has included the storm drain GIS into the OC San mapping system on May 1, 2021.

3. Address all nonconformances identified in the 2019 SSMP Audit.

OC San Environmental Services continues to track progress for all nonconformances in the 2019 SSMP audit. Completion date for this is contingent upon the 2019 audit findings completion.

Recommended Enhancements

1. OC San should consider using measurable goals to quantify the effectiveness of the SSMP. The following are examples of measurable goals:
 - Maintain an SSO rate below the state average for similarly sized sewer systems (2.3 per 100 miles of sewer line).
 - Maintain an SSO recovery rate above the state average.
 - Maintain an SSO response time of less than 30 minutes.
 - Reduce the number of hot spot locations from year to year.
 - Reduce the inflow/infiltration within the sewer system.
 - Complete a specific number of classroom and training hours for staff.

The SSMP should be updated to include any identified program goals.

Since goals are not enforceable per the SSS WDR Order but are only aspirational, OC San will not include this recommendation.

2. Utilize cleaning results/observation and CCTV data to further evaluate and optimize line cleaning frequencies.

OC San Collections Division has a draft guidance in process. This task will continue to be reviewed as needed.

3. Conduct pro-active assessments of trouble spot locations to determine cause of the location and potential mitigation measures.

OC San will modify the existing inspection program to include higher frequency inspections for trouble spots and significant deficiencies. This will be completed by June 30, 2022.

4. Update the SSMP to reference Appendix H for the list of short and long-term projects.

OC San will add a reference to Appendix H in Section 5.3 of the SSMP. This task was completed on August 12, 2021.

5. Section 5.3 and 5.3.1 are duplicated. One of the 5.3 and 5.3.1 sections should be removed from the SSMP.

OC San will remove duplicate 5.3 and 5.3.1 sections from the SSMP. This task was completed on August 12, 2021.

6. Identify or provide additional training opportunities for District staff on key SSMP related topics:
 - Cleaning procedures, including vector truck operations and use of CMMS
 - Lift station emergency response
 - SSMP program elements
 - SSO volume estimation

OC San Collections division will perform a field response exercise for Collections field staff. This task will have a completion date of December 30, 2021.

7. Create and implement standard operating procedures for key processes (Based on interviews, this task is scheduled for completion at end of fiscal year):
 - Sewer line cleaning
 - Lift station maintenance
 - Force main maintenance/condition assessment
 - Vacuum/jetting truck maintenance

OC San Collections division is currently performing an SOP development. This task will have a completed date of December 30, 2021.

8. Establish an official “Lessons Learned” procedure after projects to determine if the design guidelines need to be updated or modified to account for new technologies.

OC San Engineering has found that Lessons Learned is a topic of every project Gate Meeting. Lessons Learned are not only conducted at the completion of each project, but at every major stage of the project (Gate 4 - PDR Completion, Gate 5 – Bid and Award, Gate 6 - Commissioning, Gate 7 – Beneficial Occupancy, Gate 8 - Final Completion), such that the need for reviewing Lesson Learned is already met. Gate meeting attendees largely include EDAC committee members as well as the staff who guide the projects and can submit spec tickets with suggestions for changes to the EDGs as well as master specifications. No further improvement is required.

9. Conduct emergency bypass training at selected “high risk” lift stations.

OC San Collections will perform a field response exercise for Collections field staff. This task will be completed by December 30, 2021.

10. Conduct training for field staff with a focus on sampling and lab support for the event of an SSO exceeding 50,000 gallons. According to Lab Staff, an SOP exists for the sampling protocol, and sample bottles and equipment can be provided to collections staff.

OC San Collections and Laboratory will coordinate training efforts for Collections field staff and Lab staff. OC San Laboratory is providing a sampling protocol, including a sampling kit. In person training can be provided if desired. This task will be completed by December 30, 2021.

11. When possible, re-inspect each FSE to determine if any changes have occurred and to re-educate them on the FOG Control Program Requirements.

FSEs are currently scheduled to be inspected during the month of October 2021. This task will be completed by October 2021.

12. Incorporate self-monitoring reports such as training and pumping records for FSEs to monitor compliance when inspections can't be conducted.

Issuing and tracking biannual self-monitoring reports resumed as previously scheduled. The reports for the monitoring period from January-June 2021 were sent to all FSEs on February 24, 2021 and are required to be returned by July 15, 2021. This task was completed on February 24, 2021.

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