

Sanitary Sewer System Priorities

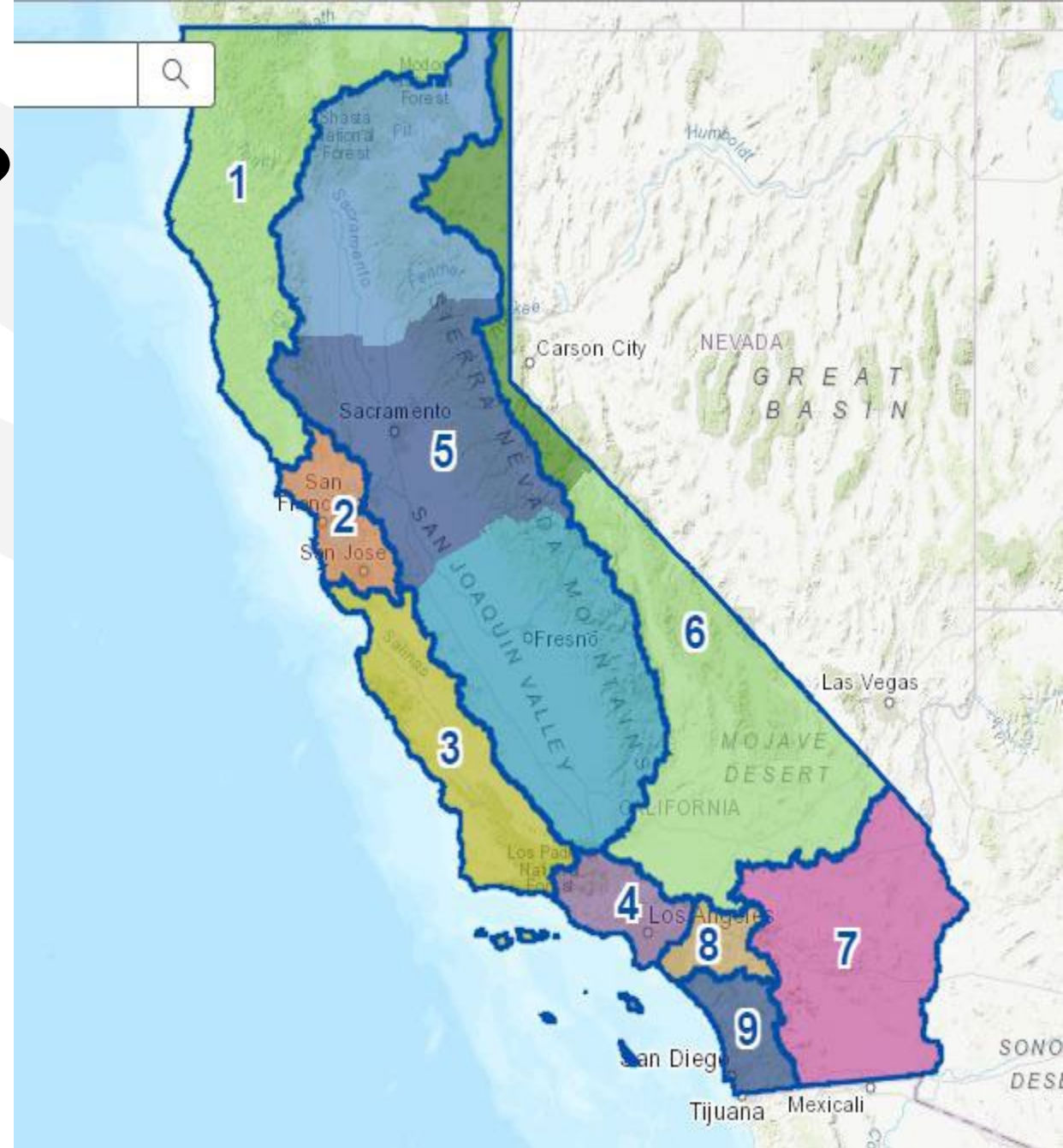
Perspective from the San Francisco Bay
Regional Water Board



11/13/2025

What's up in Region 2?

- Nine Counties:
 - Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma
- >130 sanitary sewer systems



What does the Water Board care about?

- Eliminating sanitary sewer spills



The Regional Water Board's Sanitary Sewer System Program

Ensure compliance with the General Order (2022-0103-DWQ)

- “Behind-the-scenes” audits – review spills, performance, and reporting.
- Inspections – review documents, share compliance concerns, ask questions, and answer questions. Not looking for “gotcha” moments.
- Enforcement – issue Notice of Violation, Stipulated Order, Cease & Desist Order, or other.

“Behind-the-scenes” audits



- Review Cal OES reports, public complaints, and spill reports for spill details.
- Review if spill reports, “no-spill” certifications, and annual reports were submitted on time.
- Review if agency’s Sewer System Management Plan is in CIWQS and up-to-date.

Regional Water Board Inspections



- Goal: Inspect 5 percent of systems annually
 - ~ 8 systems per year
- State Water Board also inspects
- Three phases: Pre-Inspection, Inspection, and Post-Inspection

Regional Water Board Inspections



Pre-Inspection

Your end:

- We provide 4-6 weeks notice
- Complete Pre-Inspection Checklist

Our end:

- Review spills and spill reports, no-spill certifications, and Annual Reports
- Review SSMP and Pre-Inspection Checklist

Regional Water Board Inspections

California Regional Water Quality Control Board – San Francisco Bay Region			
SANITARY SEWER SYSTEM INSPECTION FORM			
SECTION 4: SEWER SYSTEM MANAGEMENT PLAN			
ATTACHMENT D – SEWER SYSTEM MANAGEMENT PLAN – REQUIRED ELEMENTS			
Is the most recent Sewer System Management Plan uploaded to CIWQS? ²			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If no, provide rationale:			
When was the most recent Sewer System Management Plan approved by the local governing board?	10/21/2014	Were there any substantial changes since the Sewer System Management Plan was last approved by the local governing board?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If there were any Sewer System Management Plan changes, please provide a summary of the changes here:			
Does the Sewer System Management Plan contain the following elements?	Response:	If no, provide rationale:	
1. Goal and Introduction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
2. Organization	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
3. Legal Authority	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
4. Operation and Maintenance Program	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
5. Design and Performance Provisions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

Regional Water Board Inspections



Inspection

- Walk through Pre-Inspection Checklist together
 - Identify missing information and discuss
 - Encourage strong asset management program
- Identify reporting deficiencies
- Ask questions
 - CMMS, SCADA, and new technologies
- Answer questions from you

Inspections can take ~3-4 hours

Regional Water Board Inspections



Post-Inspection

- We send an inspection report within 30 days
 - Summarizes the system and sewer system programs (e.g., O&M, emergency response)
 - Identifies areas of non-compliance with General Order
 - Requires demonstration that non-compliance issues were addressed
- Residual communications
 - Clarify information
 - You updates us on corrective measures

When do we enforce?



- Big spills
- Chronic spills
- Egregious acts – slow response time, preventable based on system assessments, dishonest reporting
- Deficient reporting
- Poor compliance history

What does enforcement look like?

- Phone call or email
- Notice of Violation letter
- Administrative Civil Liability
- Cease and Desist Order



Show us you care

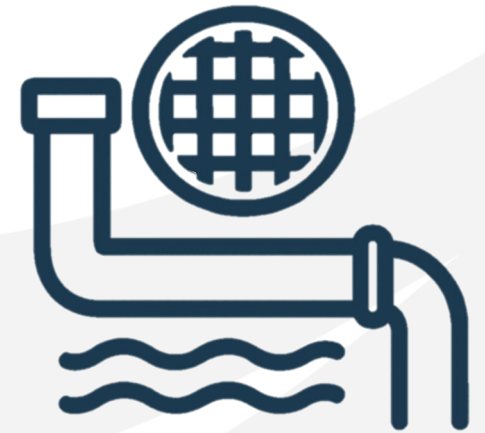
Comply with the General Order (2022-0103-DWQ)



1. Develop, implement, and update your Sewer System Management Plan
(Refer to Attachment D of General Order)
2. Notify and report spills on time
(Refer to Attachments E1 and E2 of General Order)
 - Respond to spills in timely manner

Show us you care

Develop, implement, and update your Sewer System Management Plan



- Develop O&M Program – train staff; proactively assess and maintain sewer system
- Keep design and construction criteria up-to-date
- Develop and implement Spill Emergency Response Plan
- Evaluate capacity assurance
- Develop a schedule for SSMP updates and regular audits
- And more!

See Attachment D of General Order for SSMP required elements! We will look for these elements!

Show us you care



Respond to, notify of, and report spills on time

- Respond to spill in timely manner
- Notify Cal OES as required by General Order – see *General Order page E1-3*
- Report and certify spill reports (Cat 1-4 spills, enrollee-owned lateral spills) – see *General Order Attachments E1 and E2*
- Submit no-spill certifications
- Submit annual reports

Keep your CIWQS contact info up-to-date



Section 5.1 of the General Order states,

The Enrollee shall submit any change to its Legally Responsible Official, and/or change in contact information, to the State Water Board within 30 calendar days of the change by emailing ciwqs@waterboards.ca.gov and copying the appropriate Regional Water Board...

In summary...

- Comply with the General Order
- Train staff on General Order requirements
- Ensure you're uploading required reports on CIWQS
- Invest in and prioritize your asset management program
- Keep your contact information up to date on CIWQS
- Reach out to the Water Board with questions



Important Water Board contacts



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