

City of San Bruno, California
Sewer System Management Plan Audit Report
January 31, 2025

The primary purpose of the Sewer System Management Plan (SSMP) Audit is to:

- Evaluate the implementation and effectiveness of the Enrollee's Sewer System Management Plan in preventing spills;
- Evaluate the Enrollee's compliance with this General Order;
- Identify Sewer System Management Plan deficiencies in addressing ongoing spills and discharges to waters of the State; and
- Identify necessary modifications to the SSMP to correct deficiencies.

This audit report is designed to meet the requirements of State Water Resources Control Board Order No. WQ 2022-0103-DWQ; namely, to document audit findings and recommended corrective actions and to provide a schedule to address identified deficiencies. The audit preliminary findings were discussed at a sewer system operator meeting with management and input, suggestions, and recommendations from the operators have been considered before finalizing the audit. Documentation of SSMP audits is kept on file at the City of San Bruno Corporation Yard. (See separate sewer system operations staff review and input on the audit findings statement located just before the completed SSMP audit checklist, pg. 10) Audit reports are also uploaded to the California Integrated Water Quality System (CIWQS) database.

The first item that needs to be addressed in the SSMP audit is to evaluate the implementation and effectiveness of the (SSMP) Plan in preventing spills. It should be noted that San Bruno has made significant progress in improving its maintenance and operations work over that past 15-20 years. It also has been progressively implementing a Capital Improvement Program for finding, fixing, or replacing sanitary sewers to fix or replace sewers in bad shape and others that needed to be larger to convey more wastewater to the South San Francisco/San Bruno Water Quality Control Plant. The City has also upgraded five of its six pumping / lift stations and associated force mains. The work is just about to start for the replacement of the last pumping station and force main. As a result of these improvements, some of which were a part of an earlier Cease and Desist Order and the Consent Decree, the City has reduced the number of sanitary sewer spills (SSSs) from a range of 35 to 50 spills per year to three or less since 2015 with the exception of 2019 when 4 additional spills occurred from construction work, including work to replace some of the pump stations and force mains.

Table 1 provides a summary of the number of Sewer Spills (SSS) per year since the Statewide General WDR For Wastewater Collection Agencies, Order No. 2006-0003-DWQ, was adopted by the State Water Board.

Table 1 also shows yearly volumes (vol) spilled, recovered (rcvd) and the yearly volume that reached a surface (surf) water. Table 1 shows that the improvements to the operations and maintenance (O&M) combined with the capital improvement Program (CIP) projects have resulted in significant reductions in the volume of water spilled. For example, in 2008 there were four separate spills of over 100,000 gallons each versus the last four years where the yearly volumes spilled have been less than 5,500 gallons per year for the entire 4-year period. In addition, the City is currently trying to get the replacement of the last pumping station into construction and bidding a project to increase the pipeline size in the area where rainfall dependent infiltration and inflow caused recent spills where additional conveyance capacity is needed. This pump station rehabilitation project has been delayed due negotiations with PG&E for acquiring an easement for the new force main near a high profile and sensitive gas main. Recently PG&E has approved the easement grant and the project will soon start.

While the City has been completing the cleaning schedules for minimizing sewer blockages and possible spills, the data included in Table 1 is powerful in demonstrating that the implementation and effectiveness of the (SSMP) Plan has been successful in preventing spills and that City is vigilant about constantly improving the sewer system through the operation and maintenance activities and the ongoing CIP program.

In addition to Table 1, we also reviewed the indices used by the State Board to make comparisons between the individual sewer systems and to prioritize enforcement actions. The indices¹ used are:

- The spill rates measured as the number of Category 1, 2 and 3 spills per year divided by the total length of the sewer system², expressed as the number of sanitary sewer spills (SSSs) / 100miles of the sewer system / year, and
- Net Volume of Spills (gallons / 1000 capita population / year) where the net volume (volume spilled minus volume recovered) of SSSs, for which the City is responsible, per capita (i.e. the population served by the City's sanitary sewer system), per year.

Tables 2 shows the spill rates for the past 10 years and Table 3 shows the Net Volume of Spills for each of the same years.

¹ Operational Indices are shown from CIWQS by clicking the Operational Performance tab on the Spill Public Report – Summary Page when the input data to the Sanitary Sewer System Spill Report web page on CA.gov list the WDID as 2SSO10176, All Spill Categories is chosen, and the start date is 01/01/(year chosen).

² Value calculated using miles of force mains and other pressure systems and miles of gravity sewers. For collection systems with no lateral responsibility a N/A is shown.

While it takes a little time to wade through all the numbers, both tables 2 and 3 show that San Bruno is one of the better performers when compared to both the San Francisco Region and the Statewide averages.

As discussed above, the data contained in Tables 1 through 3 demonstrate that the City's current SSMP activities are in compliance with the General Order. The only part that is not fully compliant at this date is the update of SSMP document. This includes items that will be updated and modified in the formal SSMP document.

**Table 1
Number of Sewer Spills (SSS) and Yearly Volumes (Vol) Spilled, Recovered (Rcvd) and that Reached Surface (Surf) Water**

Agency	Yr	SSS Count	SSS Vol Sum	SSS Vol Rcvd Sum	SSS Vol Surf Sum	O&M Changes Made and CIP Projects Completed
San Bruno City	2006	1	57,934	0	0	2006 WDR Adopted
San Bruno City	2007	35	18,476	6,972	11,530	
San Bruno City	2008	50	1,589,262	4,282	1,584,175	
San Bruno City	2009	45	93,740	90,098	2,452	
San Bruno City	2010	38	29,964	2,169	27,330	
San Bruno City	2011	14	8,393	353	7,635	Pipeline cleaning schedules changed
San Bruno City	2012	12	484	373	20	
San Bruno City	2013	14	2,248	1,382	800	
San Bruno City	2014	10	7,879	1,269	6,610	
San Bruno City	2015	10	17,452	15,302	2,000	Pumping station and force mains replaced
San Bruno City	2016	1	248	248	0	
San Bruno City	2017	2	200	100	100	
San Bruno City	2018	3	835	135	700	
San Bruno City	2019	7	13,224	12,724	500	Next to last pumping stations and force mains replaced
San Bruno City	2020	1	175	175	0	
San Bruno City	2021	2	3,800	200	3,600	RDI/I SSS
San Bruno City	2022	3	5,316	50	5,266	Second RDI/I and pipeline upsizing CIP project started
San Bruno City	2024	1	134	134		2022 WDR adopted
		249	1,849,764	135,966	1,652,718	

SSS Count – The number of SSS’s per calendar year

SSS Vol Sum – The sum of the volume of water from all sewer spills (SSSs) per calendar year

SSS Vol Rcvd jSum – The sum of the volume of water recovered from SSSs per calendar year

SSS Vol Surf Sum - The sum of the volume of spilled water reaching a surface water from SSSs per calendar year

Table 2
Spill Rate (Number of spills / 100 miles / year)

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2015							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
San Bruno	1.13	N/A	0.0	0.0	0.0	10.14	0.0
State Average	3.55	N/A	3.98	6.32	2.72	8.77	4.34
Region Average	4.81	N/A	0.7	1.31	0.48	9.13	4.78

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2016							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	1.12	0.0
State Average	5.44	N/A	6.05	8.86	20.17	10.47	3.11
Region Average	6.39	N/A	3.56	5.18	8.55	9.68	4.12

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2017							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	1.13	N/A	0.0	0.0	0.0	1.13	0.0
State Average	6.15	N/A	2.61	4.37	3.79	6.24	4.48
Region Average	5.31	N/A	1.26	2.8	0	7.3	6.16

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2018							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	1.13	N/A	0.0	0.0	0.0	2.25	0.0
State Average	3.6	N/A	2.44	3.71	2.48	5.84	4.15
Region Average	4.94	N/A	1.78	1.69	5.92	9.09	5.2

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2019							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	2.25	N/A	0.0	0.0	0.0	5.63	0.0
State Average	4.68	N/A	2.9	6.1	3.06	5.35	1.31
Region Average	5.59	N/A	3.26	2.44	0.11	5.92	2.02

Table 2 - Continued
Spill Rate (Number of spills / 100 miles / year)

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2020							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	1.12	0.0
State Average	3.97	N/A	1.33	1.42	11.16	4.63	1.82
Region Average	3.99	N/A	2.31	1.16	0	5	3.39

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2021							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	1.13	N/A	0.0	0.0	0.0	1.13	0.0
State Average	4.21	N/A	3.9	6.45	3.53	6.07	1.37
Region Average	7.27	N/A	3.54	2.81	0	6.27	3.1

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2022							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	1.13	0.0
State Average	2.78	N/A	3.38	2.49	11.47	6.48	1.6
Region Average	4.62	N/A	0.49	1.83	0	7.07	1.45

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2023							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno							
State Average							
Region Average							

No spills - No Spill Indices

Spill Rate Indice (spills /100mi/yr) - Calendar Year 2024							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	1.12	0.0
State Average	3.16	N/A	1.03	1.84	0.62	5.73	0.96
Region Average	1.96	N/A	0.91	1.65	0	2.6	0.11

Table 3
Net Volume of Spills (gallons / 1000 capita population / year)

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2015							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	47.44	N/A	0.0	0.0	0.0	3.56	0.0
State Average	1554.37	N/A	25451.4	1161.93	222.12	63.05	26.02
Region Average	410.76	N/A	55.22	110.65	0.55	25.28	15.76

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2016							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	0	0.0
State Average	2596.23	N/A	2969.3	468.18	300744	40.13	37.78
Region Average	7083.69	N/A	3513.85	42.81	1974.46	40.13	30

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2017							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	2.37	N/A	0.0	0.0	0.0	0	0.0
State Average	5195.41	N/A	314063	3381.92	1934.01	130.56	67.8
Region Average	3472.63	N/A	2932.86	332.43	0	35.02	6.7

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2018							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	16.6	N/A	0.0	0.0	0.0	0	0.0
State Average	764.67	N/A	2607.82	201.07	38260.1	165.97	595.46
Region Average	710.88	N/A	644.32	210.31	133700	594.97	1526.25

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2019							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	11.86	N/A	0.0	0.0	0.0	0	0.0
State Average	4734.6	N/A	5691.62	4922.51	9070.08	22.06	2.26
Region Average	4392.9	N/A	798.36	35.4	3.14	27.59	5.59

Table 3 - Continued
Net Volume of Spills (gallons / 1000 capita population / year)

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2020							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	0	0.0
State Average	4339.69	N/A	70.1	234.67	2048.16	23.59	5.52
Region Average	741.25	N/A	115.88	54.98	0	16.13	12.61

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2021							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	85.39	N/A	0.0	0.0	0.0	0	0.0
State Average	2367.38	N/A	4183.41	701.44	7149.36	173.8	268.62
Region Average	6009.03	N/A	6939.04	399.86	0	263.32	1180.09

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2022							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	0	0.0
State Average	1410.3	N/A	14685.8	255.13	5312.45	58.16	18.85
Region Average	3192.06	N/A	7.74	167.73	0	15.58	1.55

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2023							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno							
State Average							
Region Average							

No spills - No Spill Indices

Net Volume Spills Indice (gallons/1000 Capita/yr) - Calendar Year 2024							
	Category 1			Category 2		Category 3	
	Main	Laterals	Other	Main	Other	Main	Other
San Bruno	0	N/A	0.0	0.0	0.0	0	0.0
State Average	-8489.8	N/A	1009.94	496.51	68.47	97.15	4.18
Region Average	-47469	N/A	7.44	36.71	0	8.76	0.64

This audit of the Sewer System Management Plan focuses on changes to update the Plan to change some of the elements of the existing SSMP to be consistent with the organization of the 2022-0103-DWQ Order's requirements. This update will serve as a roadmap to move information from one area of the existing SSMP to another area of the updated SSMP and include new requirements. The update to the SSMP will be completed prior to the submittal date to the CIWQS database in early August of this year. Thus, there are multiple items listed that are mostly house cleaning items to realign the organization of the SSMP to match that of the new General Order rather than actual deficiencies.

The SSMP Audit Checklist presents the elements in the same order as the 2022 Order as well as the individual requirements. Yellow highlighting has been added to flag changes or additions to the list of requirements. Where new requirements were added to the list, red colored text has been used to highlight the changes.

In the "Compliant with 2022 WDR Update and Notes", the notes start with an indication of whether the information from the existing SSMP will satisfy the requirements of the 2022 update with additional notes about updates or changes that may be needed. These are internal notes to assist the SSMP update team in converting the existing SSMP to the planned update. All notes that are not shown as a "Yes" to start the text are expected to be changed to a "Yes" when the updated SSMP is uploaded to CIWQS in August.

"In Progress" mostly refers information needed from the new Sewer Master Plan which is now scheduled to be finalized in December. Due to the completion date of the Sewer Master Plan and the data needed from this plan, the City will need to complete an update to the SSMP again in December or early next year to get Council approval for the major changes from incorporating the new Sewer Master Plan data.

January 27, 2025

To whom it may concern,

Subject: Sewer system operations staff review and input on the audit findings

I would like to formally confirm that my operations staff, in collaboration with the SSMP audit team, has conducted a thorough and detailed review of the audit findings. After a comprehensive analysis and discussion of all relevant data, the team has expressed their full concurrence with the accuracy, completeness, and integrity of the information presented in the audit. We acknowledge that the findings are consistent with our operational standards, current practices, and strategic objectives.

In alignment with the latest regulatory updates, particularly the new Waste Discharge Requirements (WDR), we recognize the importance of not only maintaining but also improving our compliance processes. The audit has provided valuable insights, and we are committed to ensuring that all necessary steps are taken to meet the evolving compliance standards set forth by the WDR. As part of this commitment, we will continue to review and refine our practices, making necessary adjustments to address any gaps and enhance our operational efficiency.

Our ongoing focus will be on maintaining a proactive approach to compliance, ensuring that we not only meet the new WDR requirements but also align our operations with best industry practices. We are dedicated to maintaining transparency, accountability, and a continuous improvement mindset to effectively respond to both current and future regulatory demands.

Moving forward, we will continue to assess our internal processes and systems to identify opportunities for further optimization, keeping compliance at the forefront of our operations. Our goal is to ensure that we consistently uphold the highest standards of regulatory adherence and operational excellence.

Philip Woffenden, Wastewater Services Manager
City of San Bruno

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SSMP Audit Checklist¹

Audit Date:

Audit Team Members: Ken Holmes, Holmes International

Philip Woffenden, Wastewater Services Manager, City of San Bruno

Scot MacKenzie, Lead Maintenance Worker, Wastewater Division, City of San Bruno

Angelica Ali, Management Analyst II, Engineering Division, City of San Bruno

Review and Approval: Dennis Bosch, Public Works Deputy Director, Maintenance and Operations, City of San Bruno

Sect	Title	Requirement	Compliant with 2022 WDR Update and Notes
1	Sewer System Management Plan Goal and Introduction	The goal of the Sewer System Management Plan (Plan) is to provide a plan and schedule to:	
		(1) Properly manage, operate, and maintain all parts of the city's or agency's sanitary sewer system(s),	Yes – The Plan states the City's goals to: Properly manage, operate, and maintain the City sewer system. Provide adequate capacity to convey peak wastewater flows. Minimize the frequency and volume of sanitary sewer spills (SSSs). Contain SSSs to the extent feasible. Minimize public contact with SSSs. Mitigate the impacts from all SSSs that may occur. Comply with all required regulatory notifications and reporting requirements
		(2) Reduce and prevent spills, and	
		(3) Contain and mitigate spills that do occur.	
		The Plan must include a narrative Introduction section that discusses the following items:	
1.1.	Regulatory Context	The Plan Introduction section must provide a general description of the local sewer system management program and discuss Plan implementation and updates.	In Process - The current Plan Introduction contains a general description of the sewer system. Section 4 describes the operation and maintenance program including how the sewer maintenance is currently scheduled using work orders generated by the City's computer maintenance management system (CMMS). This section will be modified during the upcoming SSMP

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			update to provide a general description of the management program before August 2nd when the SSMP update must be submitted to CIWQS.
1.2.	Sewer System (a) Management Plan Update Schedule	The Plan Introduction section must include a schedule for the city or agency to update the Plan, including the schedule for conducting internal audits.	In Progress – The tabular figure from SWRCB web site “Sewer System Management Plan & Subsequent Update Due Dates” and “Audit Due Dates” will be added along with dates to show the planned start & finish dates for internal audits and SSMP updates. The Public Works internal target due date for updating the current SSMP is August submission is June 1st to allow time for Council review and approval.
	(b)	The schedule must include milestones for incorporation of activities addressing prevention of sewer spills.	In Progress - The update of the SSMP, which will follow the arrangement of the required information of the 2022 WDR, will address the primary milestone for the one element that is not currently in compliance, due Aug 2nd
1.3.	Sewer System Asset Overview	The Plan Introduction section must provide a description of the city or agency-owned assets and service area, including but not limited to:	
	(a)	Location, including county(ies);	Yes – Location, including county: City of San Bruno, San Mateo County, CA
	(b)	Service area boundary;	Yes – Service area boundary: San Bruno City Limits
	(c)	Population and community served;	Yes – Population and community served: San Bruno 2020 Census data population = 42,275
	(d)	System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons;	Yes – System size components: <ul style="list-style-type: none"> • Total length: 89.81 miles including force mains. • Length of gravity mainlines: 87.6 miles (per 2019 SSMP) • Length of pressurized (force) mains: 2.21 miles (2019 SSMP) • Number of pump stations: six pump or lift stations. • Number of siphons: None (0)
	(e)	Structures diverting stormwater to the sewer system;	N/A – There are no structures which divert stormwater to the sewer system
	(f)	Data management systems;	Yes – Mainstar Computer maintenance management system (CMMS)

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	(g)	Sewer system ownership and operation responsibilities between city or agency and private entities for upper and lower sewer laterals;	Yes – The property owner is fully responsible for installation, maintenance, and repair of the private sewer lateral(s) unless they have an approved clean-out at the property line. If so, the City will inspect and clean the lateral for the private property owner.
	(h)	Estimated number or percent of residential, commercial, and industrial service connections; and	Yes – The sewer system serves 13,090 residential connections and 740 commercial, industrial, and institutional customers as of 2015.
	(i)	Unique service boundary conditions and challenge(s).	Yes – While there are hills and flat areas of the City, the City is not aware of any unique service boundary conditions and challenges.
	(j)	Additionally, the Plan Introduction section must provide reference to the city’s or agency’s up-to-date map of its sanitary sewer system, as required in section 4.1 below.	Yes – GIS mapping has been developed and updated constantly since 2006. Public Works vehicles have hard copy maps, and in field laptops that display utility layers and CMMS programs. The vehicles also have copies of the City’s storm water system maps for determination of storm water inlets and facilities. This information is utilized and available for SSS response.
2	Organization	The Plan must identify organizational staffing responsible and integral for implementing the local Sewer System Management Plan through an organization chart or similar narrative documentation that includes:	
	(a)	The name of the Legally Responsible Official as required in section 5.1 of the general order;	Yes – The City’s Legally Responsible Officials (LROs) are Dennis Bosch, Deputy Public Works Director, Utilities & Operations, and Phil Woffenden, Wastewater Services Manager.
	(b)	The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific Sewer System Management Plan elements;	No - Need to update Table II-1 in the 2019 SSMP. Responsible City Official, phone numbers and email addresses will need to be updated.
	(c)	Organizational lines of authority; and	Yes – Figure II-1
	(d)	Chain of communication for reporting spills from receipt of complaint or other information, including the person responsible for reporting spills to the State and Regional Water Boards and other agencies, as applicable. (For	Yes – Included in the new Spill Emergency Response Plan (SERP) <i>Need page number reference from SERP.</i>

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		example, county health officer, county environmental health agency, and State Office of Emergency Services.)	
3	Legal Authority	The Plan must include copies or an electronic link to the city's or agency's current sewer system use ordinances, service agreements and/or other legally binding procedures to demonstrate the city or agency possesses the necessary legal authority to:	Yes – Ordinances are in place.
	(a)	Prevent illicit discharges into its sanitary sewer system from inflow and infiltration (I&I); unauthorized stormwater; chemical dumping; unauthorized debris; roots; fats, oils, and grease; and trash, including rags and other debris that may cause blockages;	Yes – Ordinances are in place. San Bruno Muni Code sections: 10.12.010, 10.12.150, 10.12.200 and 10.12.400 So, San Fran Muni Code (SSFMC) 14.08.210 (c) Code of Ordinances is available at https://ecode360.com/SA5001
	(b)	Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connections of sanitary sewer infrastructure to storm sewer infrastructure;	Yes - Public Works vehicles have hard copy maps, and in field laptops that display utility layers and CMMS programs. The vehicles also have copies of the City's storm drainage system maps for determination of storm water inlets, piping, and facilities. This information is utilized and available for SSS response. Both the Wastewater and Streets/Stormwater Divisions are located at the City's Water Corporation Yard on Huntington Ave. Having the personnel and equipment located at the same location allows easy coordination of emergency spill responses from wastewater crews with assistance from storm sewer maintenance when needed.
	(c)	Require that sewer system components and connections be properly designed and constructed;	Yes – Ordinances are in place. San Bruno Code sections 10.12.100 and 10.12.180
	(d)	Ensure access for maintenance, inspection, and/or repairs for portions of the service lateral owned and/or operated by the city or agency;	Yes – Ordinances are in place. San Bruno Code 10.08.100
	(e)	Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures; and	Yes – Ordinances are in place. San Bruno Muni Code sections: 10.12.260, 10.12.360 to 10.12.420, 10.12.500, 10.12.540, 10.13.050 to 10.13.070, and 11.20.020 SSFMC 14.08.030, 14.08.210 (b) and (c), and 15.12.060

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	(f)	Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance, as applicable.	Yes – Agreements for easement accessibility can be found online and requested through staff. A link for access to the easement documents can be provided upon request. Staff is aware of easements and has access to GIS maps for both, sewer and storm. Current Municipal Code grants permission to perform work within noted easements.
4	O&M Program	The Plan must include the items listed below that are appropriate and applicable to the city's or agency's system:	
4.1.	Updated Map of Sanitary Sewer System	An up-to-date map(s) of the sanitary sewer system, and procedures for maintaining and providing State and Regional Water Board staff access to the map(s). The map(s) must show gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities within the sewer system service area boundaries.	Yes - GIS mapping has been developed and updated using in-house and outside contractors constantly since 2006. Public Works vehicles have hard copy maps, and in field laptops that display utility layers and CMMS programs. The vehicles also have copies of the City's storm drainage system maps for determination of storm water inlets and facilities. This information is utilized and available for SSS response. Since the maps are continuously being updated, the City will provide maps upon request.
4.2.	Preventive Operation and Maintenance Activities	A scheduling system and a data collection system for preventive operation and maintenance activities conducted by staff and contractors. The scheduling system must include:	
	(a)	Inspection and maintenance activities;	Yes – There are four categories for pipeline cleaning 1) 3 mo., 2) 6 mo., 12 mo., and 36-month cleaning cycles. CCTV inspection work is scheduled to inspect the entire system once / 3 years (36 mo.). Root control spraying occurs three times per year on identified problem pipelines
	(b)	Higher-frequency inspections and maintenance of known problem areas, including areas with tree root problems;	In Progress – See Table IV-1: Hot Spot Cleaning Lines Root control treatment is budgeted and completed based on needs, NOT by budget constraints.

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			<p>Tables IV-2 and 3 will be updated showing cleaning and CCTV production from 2019 through 2024.</p> <p>Figure IV-2 will be updated in the new sewer master plan using sewer master plan data or figure.</p>
	(c)	Regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes.	<p>In Progress – Table IV-3 will be upgraded.</p> <p>Working on GIS maps showing the pipelines cleaned and the pipelines inspected using CCTV for the past 3 years.</p> <p>Working on a listing of MH's inspected per year.</p> <p>Also working on a listing of MHs needing to have troughs manually cleaned by sewer crew due to low water flow annually</p>
	(d)	The data collection system must document data from system inspection and maintenance activities, including system areas/components prone to root-intrusion potentially resulting in system backup and/or failure.	<p>In Progress – Work is scheduled and documented from work orders contained in Mainstar CMMS. Mainstar generated work orders are also used to designate pipelines for root control.</p> <p>Working on a listing of pipelines treated for root control and ones that need routine root treatment.</p> <p>Waiting for updated list of pipelines with structural deficiencies determined from the CCTV results to be provided from the new sewer master plan.</p>
		Pump Stations	<p>Yes – All pump stations were replaced or rehabbed since 2017 except one where the project is being delayed by PG&E. The pump stations have built-in emergency bypasses.</p> <p>The pump stations are inspected daily, the wet wells are cleaned monthly, and mechanical & electrical equipment preventative maintenance is performed annually for cleaning.</p>
		Force Mains	<p>Yes – With the built-in emergency bypasses in the pump stations, the City can bypass any of the force mains using lay flat hoses to pump around the force mains. On some of the longer force mains, the City can call on their contractor for emergency support where the emergency contractor (Rain 4 Rent) can arrive at the scene of a pump station with problems or a plugged force main as fast as City crews.</p>
		Private Sewer Laterals	<p>Yes – As stated in 1.3 (g) above, the property owners are fully responsible for installation, maintenance, and repair of their private sewer lateral(s).</p>

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4.3.	Training	In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors. The training must cover:	
		(a) The requirements of the General Order;	
		(b) The city's or agency's Spill Emergency Response Plan procedures and practice drills .	Yes – DFK provided an on-site practice drill with training on emergency response procedures with flow estimating from the holes in manhole covers. The training included SSS start times, volume estimation and recovery estimation. Working on providing a summary of topics covered and the date of the training.
		(c) Skilled estimation of spill volume for field operators ; and	Yes – See (b) above
	a (d)	Electronic CIWQS reporting procedures for staff submitting data .	Yes – The Deputy Public Works Director, Utilities & Operations and the Wastewater Services Manager attended CWEA CIWQS electronic reporting training in Santa Monica. The Deputy Public Works Director, Utilities & Operations also provided on the job training for the Wastewater Services Manager.
4.4.	Equipment Inventory	An inventory of sewer system equipment, including the identification of critical replacement and spare parts.	Yes – Fleet services maintain the pipeline cleaning and CCTV trucks including the pipeline hydro jetter and the supporting spare parts and major mobile equipment. Public Works maintains an inventory of critical parts for the pumping stations and pipelines including spare pumps and related items. The City also contracts with Peninsula Construction in San Carlos for sewer repairs and emergency support. The City visited the contractor's warehouse to review their stockpile of equipment and needed supplies and where they would get 24/7 replacement parts in case of an emergency.
5	Design and Performance Provisions	The Plan must include the following items as appropriate and applicable to the city's or agency's system:	

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5.1.	Updated Design Criteria and Construction Standards and Specifications	Updated design criteria, and construction standards and specifications, for the construction, installation, repair, and rehabilitation of existing and proposed system infrastructure components, including but not limited to pipelines, pump stations, and other system appurtenances. If existing design criteria and construction standards are deficient to address the necessary component-specific hydraulic capacity as specified in section 8 (System Evaluation, Capacity Assurance and Capital Improvements), the procedures must include component-specific evaluation of the design criteria.	Yes – Code references addressed design criteria for vitrified clay pipe, slopes of collector lines, laterals, minimum size for mains and other misc. requirements. The Standard Specifications and Drawings for Public Works were dated Aug 2011. Design and Construction Standards and Specs will be updated with the Sewer Master Plan.
5.2.	Procedures and Standards	Procedures, and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.	Yes – Section 33 30 00 of the Code requires testing and acceptance requirements for newly constructed or rehabilitated pipelines including hydrostatic testing, mandrel testing, air testing and closed-circuit television inspection of sewer lines. There was no reference to pumps, and other equipment and appurtenances. Design and Construction Standards and Specs will be updated with the Sewer Master Plan.
6	Spill Emergency Response Plan	The Plan must include an up-to-date Spill Emergency Response Plan to ensure prompt detection and response to spills, to reduce spill volumes and collect information for prevention of future spills. The Spill Emergency Response Plan must include procedures to:	Yes – New Spill Emergency Response Plan prepared last year. The SERP is readily available to all staff. Late Addition: After the Los Angeles wildfires, need to specifically include any special equipment, procedures, and personal needed for wildfires or large area residential or commercial fires in San Bruno
	(a)	Notify primary responders, appropriate local officials, and appropriate regulatory agencies of a spill in a timely manner;	Yes – See City of San Bruno Sewer Spill Emergency Response Plan (SERP) and Sewer/Spill/Backup Response Workbook (Workbook) starting at Pg A-1 of the Workbook.
	(b)	Notify other potentially affected entities (for example, health agencies, water suppliers, etc.) of spills that potentially affect public health or reach waters of the State;	Yes – See above and Regulatory Reporting Guide, Workbook B-1: Page 1
	(c)	Comply with the notification, monitoring and reporting requirements of the General Order, State law and regulations, and applicable Regional Water Board Orders;	Yes – See above

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	(d)	Ensure that appropriate staff and contractors implement the Spill Emergency Response Plan and are appropriately trained;	Yes – See Section 12 of the SERP
	(e)	Address emergency system operations, traffic control and other necessary response activities;	Yes – The City has separate traffic control manuals.
	(f)	Contain a spill and prevent/minimize discharge to waters of the State or any drainage conveyance system;	Yes – See Section 7.4 of the SERP and collections crew responsibilities on Pg A-4 of the Workbook.
	(g)	Minimize and remediate public health impacts and adverse impacts on beneficial uses of waters of the State;	Yes – See Sections 7.2, 7.4 and 7.5 of the SERP and collections crew responsibilities on Pg A-4 of the Workbook
	(h)	Remove sewage from the drainage conveyance system;	Yes – See Sections 7.2, 8.1 and 8.2 of the SERP and collections crew responsibilities on Pg A-4 of the Workbook
	(i)	Clean the spill area and drainage conveyance system in a manner that does not inadvertently impact beneficial uses in the receiving waters;	Yes – See Section 8 of the SERP and collections crew responsibilities on Pg A-4 of the Workbook
	(j)	Implement technologies, practices, equipment, and interagency coordination to expedite spill containment and recovery;	Yes – The City has purchased Smart Covers for each pumping station and for strategic manholes around the sewer system. SCADA system, auto-dialers, and updated connectivity software has been implemented at all pump stations to continuously monitor for high water levels that might indicate a sewer blockage. The City also has entered into interagency coordination for emergency response performed through direct contact with agency staff. City holds an agreement with the City of Millbrae and the City of South San Francisco.
	(k)	Implement pre-planned coordination and collaboration with storm drain agencies and other utility agencies/departments prior, during, and after a spill event;	Yes – See Section 7.4 of the SERP and collections crew responsibilities on Pg A-4 of the Workbook
	(l)	Conduct post-spill assessments of spill response activities;	Yes – See Section 11 of the SERP and collections crew responsibilities on Pg A-4 of the Workbook

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	(m)	Document and report spill events as required in the General Order; and	Yes – See Section 10. and Appendix A of the SERP and Pg A-1 and Wastewater Services Manager and Data Submitter Responsibilities on Pg A-4 of the Workbook
	(n)	Annually, review and assess effectiveness of the Spill Emergency Response Plan, and update the Plan as needed.	Yes - Annual training is provided to staff and procedures are reviewed for effectiveness and to gain input on suggested improvement. A summary of the annual SERP training will be provided
7	Sewer Pipe Blockage Control Program	The Sewer System Management Plan must include procedures for the evaluation of the city's or agency's service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags, and debris. If the city or agency determines that a program is not needed, justification shall be provided for why a program is not needed. The procedures must include, at minimum:	
	(a)	An implementation plan and schedule for a public education and outreach program that promotes proper disposal of pipe-blocking substances;	Yes – South San Francisco (SSF) manages the Fats, Oils, and Grease (FOG) program for San Bruno. This program includes proper disposal of rags and debris/preventative maintenance. SSF provides advertisement and social media efforts. Section VII-2 summarizes education and outreach for commercial and industrial through pamphlets and BMP posters showing proper grease waste management techniques distributed during annual inspections. This section also summarizes outreach efforts to residents to discourage FOG from being discharged to the sewer system. All specific references which are dated 2013 or 2014 will be updated.
	(b)	A plan and schedule for the disposal of pipe-blocking substances 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 substances generated within a sanitary sewer system service area;	Yes – The plan for disposal of grease is a joint effort of the City of San Bruno and SSFs Environmental Compliance Program. This provides a plan for the proper disposal of all FOG related waste and has developed a list of grease waste and used oil haulers. This program includes proper disposal of rags and debris/preventative maintenance. SSF provides advertisement and social media efforts. Additionally, SSF Environmental Compliance Inspectors through the FSE permitting program inspect and evaluate FSEs best management practices,

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			waste disposal programs and proper equipment operations and maintenance during their regular inspection.
	(c)	The legal authority to prohibit discharges to the system and identify measures to prevent spills and blockages;	<p>Yes - San Bruno Muni Code conveys the responsibilities for the FOG Control Program to the Superintendent of the SSF Water Quality Control Plant and the specific FSE discharge requirements established in the joint NPDES permit.</p> <p>All FOG discharge requirements are contained in the SSF municipal code. This includes proper disposal of rags and debris/preventative maintenance. Final formal enforcement actions are the responsibility of the City of San Bruno.</p> <p>SSF Environmental Compliance maintains a master list of all FSEs in the San Bruno Service Area used to prioritize inspections, coordinate follow-up actions, and maintain permit compliance.</p> <p>Permits are issued for a period of three years and Environmental Compliance staff coordinate renewals.</p> <p>New FSEs are identified using the business license applications at the City of San Bruno. As a new FSE is identified, the Environmental Compliance section will review and require the business to submit a permit application that will then be reviewed against the FOG Program requirements prior to issuing a discharge permit.</p>
	(d)	Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, recordkeeping, and reporting requirements;	Yes - Covered in Section VII-5
	(e)	Authority to inspect grease producing facilities, enforcement authorities, and whether the city or agency has sufficient staff to inspect and enforce the fats, oils, and grease ordinance;	<p>In Process - Mostly covered in Section VII-6.</p> <p>Add information on the staff level of SSF Environ Compliance Dept</p>
	(f)	An identification of sanitary sewer system sections subject to fats, oils, and grease blockages and establishment of a cleaning schedule for each section; and	Yes - Mostly covered in Section VII-7. Not clear if the pipelines included on the hot spot cleaning program are on the list for grease blockage concern or for other issues. A current listing of the pipelines on the hot spot list will be included in the SSMP and why they are listed.

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	(g)	Implementation of source control measures for all sources of fats, oils, and grease reaching the sanitary sewer system for each section identified above.	Yes – See paragraph (f)
8	System Evaluation, Capacity Assurance and Capital Improvements	The Plan must include procedures and activities for: <ul style="list-style-type: none"> • Routine evaluation and assessment of system conditions. • Capacity assessment and design criteria. • Prioritization of corrective actions; and • A capital improvement plan. 	
8.1.	System Evaluation and Condition Assessment	The Plan must include procedures to:	Note: The City has hired a consultant to prepare a new Sewer Master Plan, which is expected to be delivered by December. This plan will present new recommendations for repairing or replacing key pipelines. The new master plan will also address the condition of the sewer system as part of the new recommendations.
	(a)	Evaluate the sanitary sewer system assets utilizing the best practices and technologies available;	Yes - Section IV-2 of the SSMP stated that future CCTV program will use PACP defect and pipeline sewer ratings (pg 38). This is not expected to change in the new Sewer Master Plan.
	(b)	Identify and justify the amount (percentage) of its system for its condition to be assessed each year;	Yes - Section 4.2 (a) stated current pipeline cleaning, CCTV inspections, and root control schedules. These schedules are as follow: <ul style="list-style-type: none"> • Four schedules for pipeline cleaning: 1) 3 mo., 2) 6 mo., 3) 12 mo., and 4) 36 months • CCTV inspection work is scheduled to inspect the entire system once every 3 years (36 mo.). • Root control spraying occurs three times per year on identified problem pipelines that have been updated for the entire sanitary sewer system. The cleaning, CCTV inspections, and root control work has dramatically reduced the number of sewer system spills from over 50 in 2007 to fewer than three per year since 2020 with a significant reduction of the total spill volume as well. .The sewer system performance metrics justify the

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			percentage of the system to be assessed each year to determine the condition of the system.
	(c)	<p>Prioritize the condition assessment of system areas that:</p> <ul style="list-style-type: none"> • Hold a high level of environmental consequences if vulnerable to collapse, failure, blockage, capacity issues, or other system deficiencies. • Are located in or within the vicinity of surface waters, steep terrain, high groundwater elevations, and environmentally sensitive areas. • Are within the vicinity of a receiving water with a bacterial-related impairment on the most current Clean Water Act section 303(d) List: 	<p>In Process – The Sewer Master Plan consultant will provide the information listed in (c). That includes item 3 regarding checking if any pipelines are within the vicinity of a receiving water with a bacterial-related impairment. If so, Clean Water Act section 303(d) would need to be checked to determine if this requirement is applicable and, if so, when pipelines, manholes, pump stations, force mains, etc. might need special condition assessment ratings.</p>
	(d)	Assess the system conditions using visual observations, video surveillance and/or other comparable system inspection methods;	<p>Yes – Routine preventative maintenance schedule and efforts performed on a 3-year rotation via CCTV inspections and reporting. Everything is uploaded to IT Pipes software. Reports are assessed daily and problem spots are handled immediately depending on the gravity of the problem.</p>
	(e)	Utilize observations/evidence of system conditions that may contribute to exiting of sewage from the system which can reasonably be expected to discharge into a water of the State;	<p>Yes – Major defects, including observations or evidence of system conditions that may contribute exfiltration, are addressed and repaired immediately by the City's contractors.</p>
	(f)	Maintain documents and recordkeeping of system evaluation and condition assessment inspections and activities; and	<p>Yes – Condition assessment data is currently stored and retrieved in the Mainstar database. Maintstar is the current asset management system of record (i.e. work orders, etc.)</p>
	(g)	Identify system assets vulnerable to direct and indirect impacts of climate change, including but not limited to sea level rise; flooding and/or erosion due to increased storm volumes, frequency, and/or intensity; wildfires; and increased power disruptions.	<p>In Process - This is an element that will be addressed by the Sewer Master Plan consultant.</p>

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8.2.	Capacity Assessment and Design Criteria	The Plan must include procedures to identify system components that are experiencing or contributing to spills caused by hydraulic deficiency and/or limited capacity, including procedures to identify the appropriate hydraulic capacity of key system elements for:	In Process – The capacity of the system is being assessed as part of the Master Plan work being completed by an engineering consultant. The results of this work will become the foundation of new CIP projects to make the system more reliable and resilient while also identifying where capacity enhancements are needed.
		(a) Dry-weather peak flow conditions that cause or contributes to spill events;	In Process – Will be assessed in the new Master Plan report expecting to be finalized by December of this year (2025),
		(b) The appropriate design storm(s) or wet weather events that causes or contributes to spill events;	In Process – Will be assessed in the new Master Plan report.
		(c) The capacity of key system components; and	In Process – Will be assessed in the new Master Plan report.
		(d) Identify the major sources that contribute to the peak flows associated with sewer spills.	In Process – Will be assessed in the new Master Plan report.
		The capacity assessment must consider:	
		(e) Data from existing system condition assessments, system inspections, system audits, spill history, and other available information;	In Process – Will be assessed in the new Master Plan report.
		(f) Capacity of flood-prone systems subject to increased infiltration and inflow, under normal local and regional storm conditions;	In Process – Will be assessed in the new Master Plan report.
		(g) Capacity of systems subject to increased infiltration and inflow due to larger and/or higher-intensity storm events as a result of climate change;	In Process – Will be assessed in the new Master Plan report.
		(h) Increases of erosive forces in canyons and streams near underground and above-ground system components due to larger and/or higher-intensity storm events;	In Process – Will be assessed in the new Master Plan report..

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	(i)	Capacity of major system elements to accommodate dry weather peak flow conditions, and updated design storm and wet weather events; and	In Process – Will be assessed in the new Master Plan report.
	(j)	Necessary redundancy in pumping and storage capacities.	In Process – Will be assessed in the new Master Plan report.
8.3.	Prioritization of (a) Corrective Action	The findings of the condition assessments and capacity assessments must be used to prioritize corrective actions.	In Process – Will be assessed in the new Master Plan report.
	(b)	Prioritization must consider the severity of the consequences of potential spills.	In Process – Will be assessed in the new Master Plan report.
8.4.	Capital Improvement Plan	The capital improvement plan must include the following items:	
	(a)	Project schedules including completion dates for all portions of the capital improvement program;	In Process – Will be assessed in the new Master Plan report..
	(b)	Internal and external project funding sources for each project; and	In Process – This condition will be addressed in the new sewer master planning efforts with coordination with the City Engineering or Planning to address funding sources.
	(c)	Joint coordination between operation and maintenance staff, and engineering staff/consultants during planning, design, and construction of capital improvement projects; and Interagency coordination with other impacted utility agencies.	In Process – The coordination needed between operation and maintenance staff, engineering staff, and consultants during planning, design, and construction of capital improvement projects will be addressed in the new sewer master planning efforts.
9	Monitoring, Measurement and Program Modifications	The Plan must include an Adaptive Management section that addresses Plan-implementation effectiveness and the steps for necessary Plan improvement, including:	
	(a)	Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities;	Yes - Need to have a copy of most recent audit

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	(b)	Monitoring the implementation and measuring the effectiveness of each Plan Element;	<p>In Process - Need to monitor performance metrics for O&M activities like</p> <ol style="list-style-type: none"> 1. Miles (or 1000s of feet) for hydro-jetting feet per year per schedule 2. Hot Spot cleaning footage per year 3. Rodding length per year, 4. CCTV inspection per year, and 5. chemical root control length per year 6. Pump station metrics 7. Sewer pipe blockage control metrics <ul style="list-style-type: none"> o Food Service Establishments (FSE's) inspected per year, o Number of warnings, citations, other enforcement actions. <p>Also update system performance measures, i.e., Vol spilled / yr by cause, Number of spills / yr by cause, SSO trends, volume of spills recovered, spills by category,</p>
	(c)	Assessing the success of the preventive operation and maintenance activities;	Yes - See above.
	(d)	Updating Plan procedures and activities, as appropriate, based on results of monitoring and performance evaluations; and	In Process - Use Adaptive Management to address procedures and activities, as appropriate, that are working well and base future changes made from the results of monitoring and performance evaluations, as appropriate.
	(e)	Identifying and illustrating spill trends, including spill frequency, locations, and estimated volumes.	Yes - See above
10	Internal Audits	The Plan shall include internal audit procedures, appropriate to the size and performance of the system, for the city or agency to comply with section 5.4 (Sewer System Management Plan Audits) of the General Order.	Yes - Ref to Audit Checklist, roles of the Dep Dir & WW Services Mgr., Need to have copy of most recent audit readily available. Need to define audit procedures to align with the updated audit form.
11	Communication Program	The Plan must include procedures for the city or agency to communicate with:	
		The public for:	

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		<ul style="list-style-type: none"> Spills and discharges resulting in closures of public areas, or that enter a source of drinking water, and 	<p>Yes - The public is notified depending on the gravity of the SSS. This may be through the City's social media page or directly to the impacted neighborhood by distributing door tags..</p>
		<ul style="list-style-type: none"> The development, implementation, and update of its Plan, including opportunities for public input to Plan implementation and updates. 	<p>Yes - A report and Resolution detailing the components of that SSMP was considered and accepted by City Council in open session that can viewed by citizens in person or on cable television.</p>
		<p>Owners/operators of systems that connect into the city's or agency's system, including satellite systems, for:</p>	<p>N/A</p>
		<ul style="list-style-type: none"> System operation, maintenance, and capital improvement-related activities. 	<p>Yes - Indirectly through budget documents, reports and resolutions before City Council, and wastewater rate public hearings all available through local cable television and/or City of San Bruno web site</p>

ⁱ All requirements were taken directly from Attachment D – Sewer System Management Plan – Required Elements of the Statewide Sanitary Sewer Systems General Order 2022-0103-DWQ.

The term “Enrollee” was universally changed to “city or agency” for the convenience of reviewers and city or agency staff. Bracketed letters like (a), (b), ...(m) were added to the Title column to allow cross-referencing to specific requirements.