CHAPTER 10
PROGRAM AUDITS

I. Introduction and Purpose

Internal audits of the SSMP program are to occur, at a minimum, every two years. The audit shall evaluate the effectiveness of the SSMP and District compliance with the SSMP requirements. Deficiencies, if they exist, shall be identified and steps described to correct them.

II. Self Assessment

	Yes	No	N/A
Document Control			
1. Does your agency have document control procedures to ensure current and historical documentation recovery?			
2. a. Are all documents located in a single place electronically?			
b. Are all documents located in a single place as a hard copy?			
Data Management			
3. Does your agency have performance reports and progress tracking systems that are reviewed by appropriate management on a regular basis?			
4. Is the data easily transferable or compared to historical data in order to relate.			
5. Can performance data be benchmarked to other similar agencies for comparison?			
Documented Procedures			
6. Is there an established or set time period for conducting audits?			
7. Is the organization's top management involved with the analysis of performance data and program audits?			
Outcomes			
8. Does the organization act appropriately to nonconformance and consider magnitude of problems and commensurate with environmental impact and industry standards?			

III. Regulatory Requirements for SSMP Program Audits

Program audits will be conducted on an annual basis. The audit will be completed by Staff in consultation with the Operations Manager. The scope of the audit will cover each of the major sections of the SSMP including:

- Identifying any significant changes to elements or components of the SSMP;
- Identifying any significant changes to referenced compliance and supporting documents;
- Evaluating the effectiveness of the SSMP;
- Describing any deficiencies in the SSMP and formulating steps to correct those deficiencies;
- Identifying system improvements made during the past audit cycle; and
- Identifying system improvements planned for the upcoming audit cycle.

An audit checklist is included as Appendix 10-A.

APPENDIX 10-A
SSMP PROGRAM AUDIT

Element	SSMP Current?	Implemented?	If no, steps needed to fulfill requirement
Element #1: Goals (n/a)			
Element #2: Organization			
Designate legally responsible official			
Names and phone numbers for key management personnel			
Name and phone numbers for key administrative personnel			
Chain of communication for reporting SSOs			
Element #3: Legal Authority			
Prevent illicit discharges into sanitary sewer system			
Require that sewers ad connections be properly designed and constructed			
Ensure access for maintenance, inspection, and repairs			
Limit discharge of FOG and debris that may cause blockages			
Require installation of grease removal devices			
Ability to inspect FOG producing facilities			
Enforce violations of Wastewater Ordinance			
Element #4: Operation & Maintenance Program			
Maintain up-to-date maps of sanitary sewer system (electronic and hard-copy)			

Element	SSMP Current?	Implemented?	If no, steps needed to fulfill requirement
Describe routine preventive maintenance program			
Document completed preventive maintenance using system such as work orders			
Rehabilitation and replacement plan that identifies and prioritizes sanitary sewer defects			
Filing system for video inspections			
Maintain critical spare parts inventory			
Element #5: Overflow Emergency Response Plan			
Procedure for the notification of primary responders			
Procedures for the notification of regulatory agencies			
Program to ensure appropriate response to all SSOs			
Procedure to ensure proper reporting of all SSOs			
Procedures to investigate the cause of all SSOs			
Element #6: FOG Control Program			
Public outreach program that promotes the proper disposal of FOG			
Plan for the disposal of FOG generated in the service area			
Demonstrate that the District has allocated adequate resources for FOG control			
Database of establishments producing FOG			
Database identifying locations that have FOG related issues			

Element	SSMP Current?	Implemented?	If no, steps needed to fulfill requirement
Element #7: Sewer Standard Specifications and Details			
Design and construction standards for new facilities			
Design and construction standards for repair and rehabilitation of existing facilities			
Procedures for the inspection and acceptance of repaired and rehabilitated and new facilities			
Element #8: System Evaluation and Capacity Assurance Plan			
Identification of elements of the system that experience or contribute to SSOs caused by hydraulic deficiencies			
Establish design criteria that provide adequate capacity			
Short-term project list that addresses known hydraulic deficiencies			
Long-term project list that addresses known hydraulic deficiencies			
Updated information on pump setpoints for SCADA calculation of flow rates at lift stations			
Element #9: Monitoring, Measurement, and Program Modifications			
Maintain relevant information to establish, evaluate, and prioritize SSMP activities			
Monitor implementation of SSMP			
Measure, where appropriate, performance of SSMP elements			
Identify and illustrate SSO trends			

Element	SSMP Current?	Implemented?	If no, steps needed to fulfill requirement
Element #10: SSMP Program Audits			
Record results of each audit in a report kept on file			
Element #11: Communication Program			
Communicate with the public regarding the performance of the SSMP			
Communicate with tributary or satellite sewer systems			