Preparing for an Audit

HDR

Presenter Background

- California Water Environment Association (CWEA) Board Member

- Chair of CWEA SSS-WDR Training Task Force

- 20 years of experience focusing on collection system asset management and operations
  - National Practice Lead for Collection System Operations
  - Vice-Chair of Asset Management Practice

California
Water
Environment
Association

Protecting our water environment through education and training.

Focus of Presentation

- Preparation for Regulatory Audit
  - Local Regulatory
    - State Water Resources Control Board (SWRCB)
    - Regional Water Quality Control Board (RWQCB)
  - Site Inspection
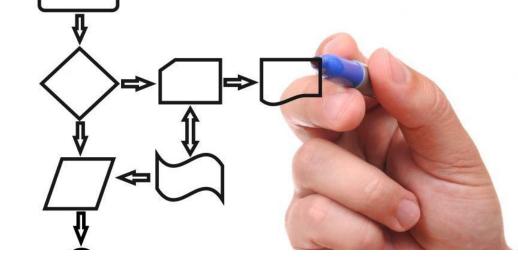 - Focused on compliance with SWRCB SSS-WDR

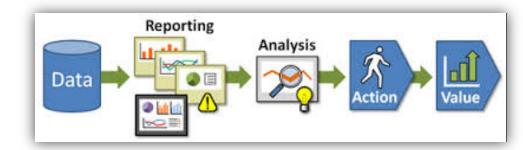# Why Do Regulatory Audits Happen?

- Inspecting violations or areas of concern
- Evaluating adequacy of SSO preparedness and field response
- Evaluating SSMP implementation
- Promoting program compliance and conformity
- Developing compliance baseline
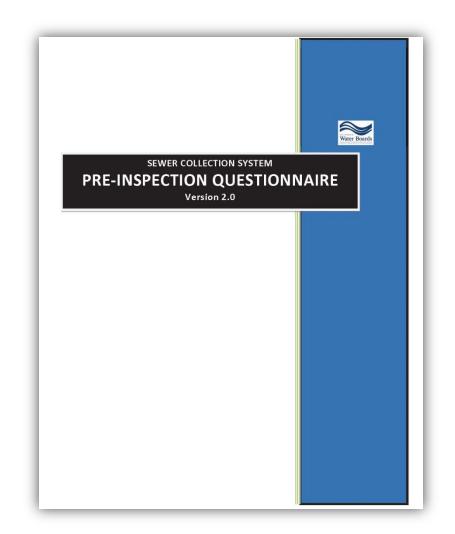
What Do They Look At?

- Inspection and maintenance procedures
- Record keeping practices
- Checking accuracy of SSO reporting
  - Includes interviews with field staff
- Methodologies and calculations for SSO volume estimation
- Corrective actions to address issues
- Consistency of practices with SSMP

How Does it Happen?

- Usually starts with request to fill out Pre-Inspection Questionnaire
    - 30 days to respond
- Usually notified less than 1 business day prior of impending site visit
    - Afternoon the day before showing up following morning

Pre-Inspection Questionnaire

ID	Pre-Inspection Questionnaire Section	Total Number of Questions	Questions with Potential City Responses	Percent	Notes
1	Documentation	7	5	71%	
2	Basic Information	40	7	18%	
3	Organization	5	5	100%	
4	Sewer System Assets	38	1	3%	
5	Financial Information	13	7	54%	
6	Local Sewer Use Ordinance	25	25	100%	
7	Capital Improvement Plan	4	0	0%	
8	Operations and Maintenance Program	51	14	27%	FOG-related
9	SSO Emergency Response Program	8	3	38%	Focused on City role in response.
10	SSO Reduction Performance and Monitoring Program	2	0	0%	
11	Collections Staffing and Training	9	3	33%	Training on City side.
12	Major Equipment Inventory	9	1	11%	Equipment to block spill to storm
13	External Communications Program	4	2	50%	
14	Notification, Reporting and Record Keeping	10	2	20%	Documentation of SSO calls and emails that came through City.
15	SSO Prevention and Mitigation	9	0	0%	
	TOTAL	234	75	32%	

Breakdown of Pre-Inspection Questionnaire

How Does it Happen? - Typical Site Visit

Time	Event	Note
7:00 AM- 7:15 AM	Audit Team Arrives Introductions Welcome by City LRO	1 Rep SWRCB 1 Rep RWQCB 1 Consultant (maybe)
7:15 AM – 7:45 AM	Audit Team presents general overview for the day	Usually a 1-day site visit

How Does it Happen? - Typical Site Visit

- Opportunity to tell your story

Time	Event	Note
7:45 AM-8:45 AM	City provides overview of collection system program	Organization Roles and Responsibilities Preventive Maintenance Program Repair Program Rehabilitation and Replacement Program FOG Program Capacity Assurance Performance Metrics

How Does it Happen? - Typical Site Visit

Time	Event	Note
8:45 AM-9:00 AM	Break	
9:00 AM-9:30 AM	1. Auditor asks questions regarding presentation 2. Auditor requests records to be reviewed 3. Auditor requests time alone with field employees in field	Records to be reviewed Systems to be reviewed

How Does it Happen? - Typical Site Visit

Time	Event	Note
9:30 AM-10:00 AM	Provide records	Be prepared to have records available.

Types of Records Typically Requested

- SSMP
- Certified SSO Reports
- SSO Field worksheets
- Recent SSMP Program Audit
- Sewer system map
- SSO Emergency Response Plan
- Training Records
- Preventive Maintenance Records
- Inspection Records
- Log Records of Incoming Potential SSO Calls

Types of Systems Typically Requested

- CMMS/Work Order/Preventive Maintenance Records

- Data System for Tracking SSO events (SSO Log)

- Storage of Records

- Annual Collection System Questionnaire

How Does it Happen? - Typical Site Visit

Time	Event	Note
10:00 AM-Noon	Auditors review records independently	Focus: Consistency of SSO reporting Response to various events Volume estimation calculations Consistency of practices with SSMP
Noon-1:00 PM	Lunch	

What Do They Look for in SSO Reporting?

- Role of City with SSO complaint

- Documentation of SSO complaint provided to City

- Consistency with SSO Reporting in CIWQS database, field reports, CMMS, etc.

How Does it Happen? - Typical Site Visit Format

Time	Event	Note
1:00 PM-1:15 PM	Reconvene – Field inquiry identified	Pump station Crew performing routine PM Responders to a recent SSO selected by auditor at SSO location

How Does it Happen? - Typical Site Visit Format

Time	Event	Note
1:15 PM-3:30 PM	Auditor's tour lift station and interview field crews	Interviews

- PM Crew Interview Questions:
  1. Are you familiar with your SSMP?
  2. Have you been trained on the sewer overflow response plan (SORP)?
- Crew Responding to SSO:
  1. Independent questioning of each responder to see if stories are consistent

How Does it Happen? - Typical Site Visit

Time	Event	Note
3:30 PM-5:30 PM	Auditors continue to review records	Occasional request for document or record not already presented
5:30 PM-6:30 PM	Auditor debrief on findings	

What Happens After?

- Sometimes nothing
- Sometimes inspection report
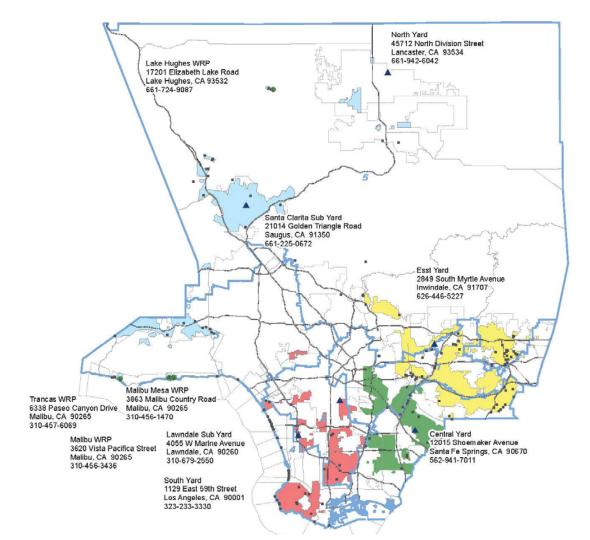- Sometimes followed up with further action

How Do I Prepare?

- Proactively fill out the Pre-Inspection Questionnaire.
- Make sure a City legally responsible official is identified and up-to-date
- Make sure there is at least on WDR/SSMP subject matter expert
- Understand breakdown of roles and responsibilities between City and LACDPW
  - If possible, City SSO first responder
  - If possible, City containment capability

Sewer Maintenance Facilities

North Yard
45712 North Division Street
Lancaster, CA 93534
661-942-6042

Lake Hughes WRP
17201 Elizabeth Lake Road
Lake Hughes, CA 93532
661-724-9087

Santa Clarita Sub Yard
21014 Golden Triangle Road
Saugus, CA 91350
661-225-0672

Esst Yard
2849 South Myrtle Avenue
Inwindale, CA 91707
626-446-5227

Trancas WRP
6338 Paseo Canyon Drive
Malibu, CA 90265
310-457-6069

Malibu Mesa WRP
3863 Malibu Country Road
Malibu, CA 90265
310-456-1470

Malibu WRP
3620 Vista Pacifica Street
Malibu, CA 90265
310-456-3436

Lawndale Sub Yard
4055 W Marine Avenue
Lawndale, CA 90260
310-679-2550

Central Yard
12015 Shoemaker Avenue
Santa Fe Springs, CA 90670
562-941-7011

South Yard
1129 East 59th Street
Los Angeles, CA 90001
323-233-3330

Legend
▲ SMD_Maintenance_Yards
SMD Water Reclamation Plants
SMD Pump Stations
County Supervisorial Districts
Cities

**Sewer Maintenance Service Area
By Yard:**
North Yard
South Yard
East Yard
Central Yard

PUBLIC WORKS

0 2 4 8 12 16
Miles

Esst Yard
2849 South Myrtle Avenue
Inwindale, CA 91707
626-446-5227

lesa WRP
libu Country Road
CA 90265
·1470

Lawndale Sub Yard
4055 W Marine Avenue
Lawndale, CA 90260
310-679-2550

South Yard
1129 East 59th Street
Los Angeles, CA 90001
323-233-3330
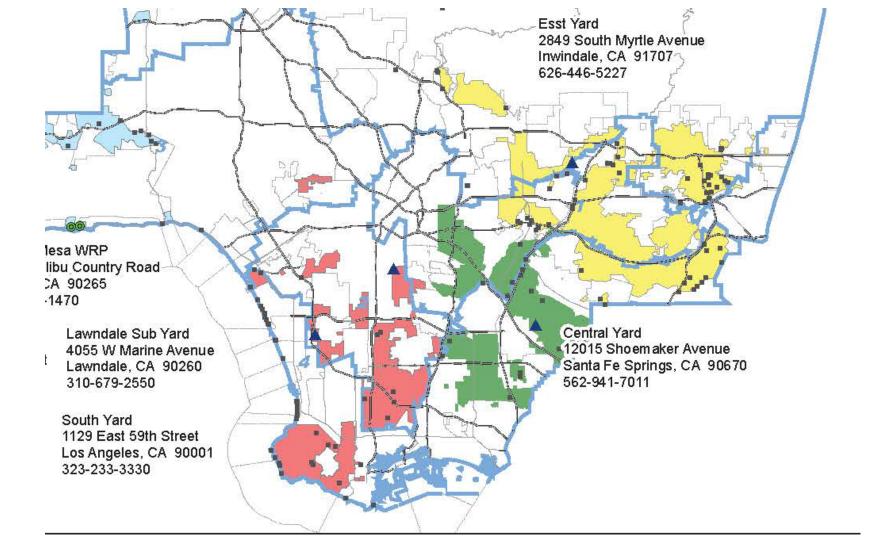
Central Yard
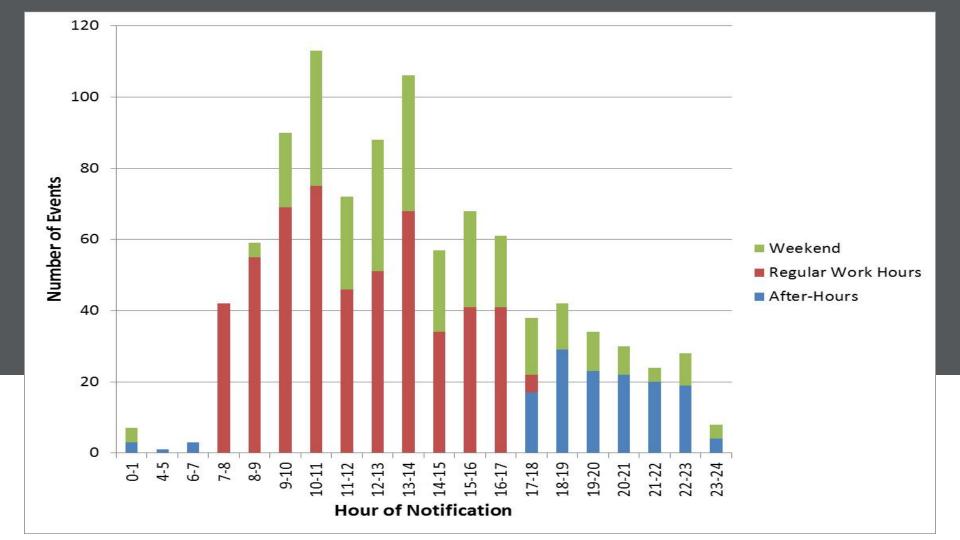12015 Shoemaker Avenue
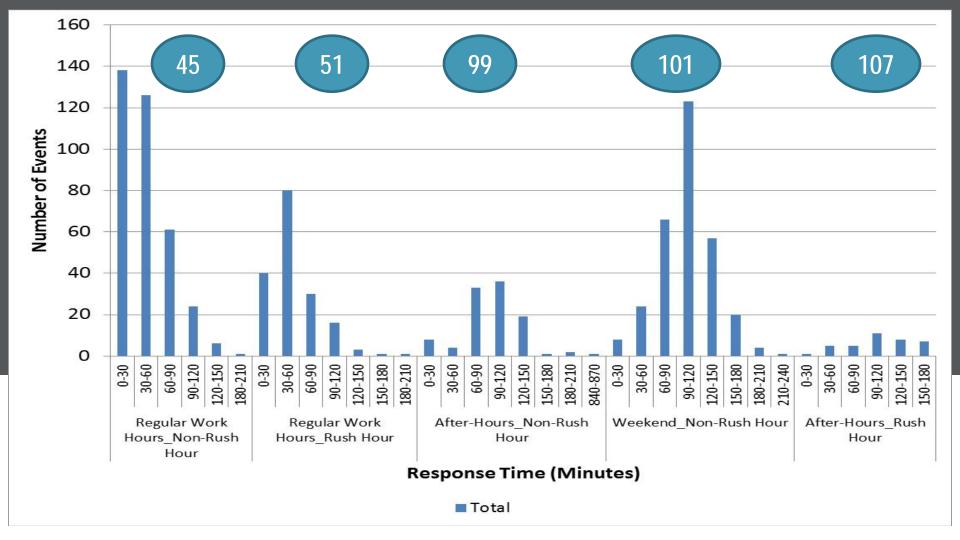Santa Fe Springs, CA 90670
562-941-7011

How Do I Prepare?

- Have an Up-to-Date SSMP
  - Organization
  - Legal Authorities
  - References to LACDPW O&M and CIP Program
  - SSO Response Plan
  - FOG Program
    - Evaluation/justification, if no program
  - System Evaluation and Capacity Assurance Plan
    - Process for new connections, redevelopment
    - Evaluate need for hydraulic modelling/master plan
      - » Cities with pipes 12″ or greater
  - Communication Plan
    - Do residents know who to call? On City website?

How Do I Prepare?

- Thorough SSMP Program Audits
  - On-going auditing
- Understand Performance of SSMP and System
- Training Program and Refreshers for City staff
  - SSMP familiarization training for City staff involved with SSMP elements
- Mock regulatory inspection

Questions?

Michael.flores@hdrinc.com
(714) 785-9421