



**COUNTY OF LAKE**  
**SPECIAL DISTRICTS ADMINISTRATION**  
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**Scott Harter**  
Special Districts Administrator

June 3, 2024

Mr. Howard Hold  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Dr., Suite 200  
Rancho Cordova, CA 95670

**Notice of Violation of Water Quality Order No. 2022-0103-DWQ, Lake County Southeast Regional Waste Disposal Facility Collection System, WDID 5SSO11055**

Dear Mr. Hold:

This report presents the response to the Notice of Violation dated May 1, 2024. The Notice of Violation contains a June 3, 2024 date for submitting a written response of what measures have been and are being taken to return to compliance with Order WQ-2022-0103-DWQ, Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems.

Violations:

1. Based on review of CIWQS data reported by the Enrollee between 2007 and 2023, the Enrollee reported that 1,057,089 gallons of untreated sewage reached surface waters: (Clean Water Act, Section 301; Prohibition 4.2 of the SSS WDR's)

This violation appears to be correct, over the last 16 years the Category 1 SSO's have totaled 1,057,089 gallons. Of note the top 4 spills in the list total 925,400 gallons with the remaining 35 SSO's totaling 131,689 gallons. The District has a proactive inspection, line cleaning, and maintenance regimen and is continually seeking to improve collection system operations. In the Southeast collection system the district maintains approximately 100 miles of gravity mains. The District has acquired equipment to perform acoustic inspections allowing for a more efficient inspection of the collection system. The current superintendent for the collection system is increasing the quantity of the collection system inspected and cleaned each year with the goal of completing inspection of the system on a three year cycle. The new

equipment and the increased inspection schedule should result in fewer SSO's for the collection system.

2. The Enrollee does not have a formal capital improvement plan (CIP).

The District has a Master Plan which was created by CH2M Hill June 26, 2009 which contains a system analysis as well as alternatives for capacity mitigation projects. The document also contains an analysis of proposed development and estimated costs. This document has served as a CIP and is the most current version presently. Completion of the Lift Station 4 improvements identified in the document have also already occurred. In addition to the master plan document, capital projects are identified in the budget on an annual basis and subsequently adopted by the Board of Directors. The adopted budget then serves as a planning document for capital improvements over a three year period as some projects are planned and budgeted for over multiple years as reserves are built up to fund the project.

The need for more current CIP documents across multiple departments has been identified within the department and by County Administration and an RFP was issued the beginning of April, due the middle of March, to retain a consultant to develop a Strategic Capital Improvement Plan master planning document for the Special Districts, Public Services, and Public Works Departments. This effort will result in a more current long range planning document (CIP) to assist in guiding the direction of the District in its operation of the Southeast Wastewater Collection System.

3. The Enrollee failed to submit and certify No Spill Reports, Category 4 Spill Reports, and SSO Reports within the required timeline.

Outstanding reports have been submitted and certified within CIWQS. With recent changes to the SSMP and SERP requirements staff was unfamiliar with the updated Category 3 & 4 submission process and had overlooked certifying the No Spill Reports form. Training for staff has occurred and procedures for certification have been reviewed for pertinent staff to reduce the likelihood that reporting requirements are missed in the future.

#### Area(s) of Concern:

1. The Enrollee does not have emergency signage for aerial crossings or ARVs.

The one location inspected during the audit does not have emergency signage. Staff has ordered appropriate signs identifying the facility and

providing a 24/7 emergency number.

2. There has been a significant delay in alarm notification from the Enrollee's third-party alarm company.

Internal policies of the alarm company have never resulted in an SSO or other negative consequence for the District. The alarm company had a policy to wait an hour after an unsuccessful notification attempt before trying to notify again. We have worked to provide additional means of communication for them to attempt before they determine the district to be unreachable between calls. This has reduced the delay in notifications from the company and provided greater resilience within that system.

3. The Enrollee has had difficulties obtaining a capacity management operation and maintenance (CMOM) coordinator.

This is accurate, since the retirement of the former CMOM Coordinator there have been multiple recruitment attempts which were unsuccessful. As a result the district has been working with HR to revise the job description, job requirements, and salary in an effort to make the recruitment process successful. The Board of Supervisors has recently approved the salary and duty changes, the position is funded in the upcoming budget cycle, and recruitment is scheduled to begin July 1.

4. The Enrollee does not have formalized standard operating procedures (SOPs) for training and operation and maintenance.

This is partially accurate, the District does have SOP's in place for the operation of some of our equipment and lift stations, etc. however, the SOP's are not exhaustive. Our Utility Systems Compliance Coordinator position is tasked with creating SOP's where they are lacking. Successful recruitment of the CMOM Coordinator will allow our US Compliance Coordinator the ability to focus more on those duties.

5. The Enrollee does not re-review CCTV footage after the initial inspection.

This is only partially accurate and implies that the initial inspection is insufficient. The district has recently acquired a new CCTV van which was available for inspection during the audit. This new van is equipped with software which allows the operator to annotate the captured video in real time with any defects or concerns and to generate a PACP rating for the inspected segment during that initial inspection.

Even prior to the acquisition of the updated equipment if field staff noted areas of concern on a segment of pipeline during the inspection office staff, typically the deputy administrator, would re-review the footage and appropriate actions would be taken to rectify any issues discovered.

6. The Enrollee does not have a method in place to inspect and maintain air relief valves (ARVs).

ARV's are typically inspected as part of staff duties however there has not been a formal method or schedule in place. Staff will develop a map, inspection checklist, and schedule to facilitate a reliable inspection regimen for the system ARV's

7. The Enrollee does not use a computerized maintenance management system (CMMS) and relies on historical knowledge of problem areas.

This is not entirely accurate. While historical knowledge of problem areas is helpful it is not the only means by which data about the collection system is stored. Service requests and issues are reported and currently indexed in our Cost Accounting Management System (billing and service request/work order software). This software maintains a record of known issues and provides for an electronic database of said issues. It's not modern or GIS based but it is a computerized database of system maintenance. Staff is currently utilizing ESRI ArcGIS products to establish a CMMS within our existing GIS mapping of our infrastructure. It has been a multi-year effort starting with the proofing of our GIS map grade data and conversion of the data to pipeline collection shapes rather than simple polylines. Once the GIS data is vetted, the maintenance tracking and planning tools within the software can be fully utilized to provide a modern, GIS based CMMS for the district.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



Digitally signed by Scott Harter  
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Scott Harter,  
Administrator