TRIUNFO
WATER & SANITATION DISTRICT

SEWER SYSTEM MANAGEMENT PLAN

DECEMBER 2025

INTRODUCTION

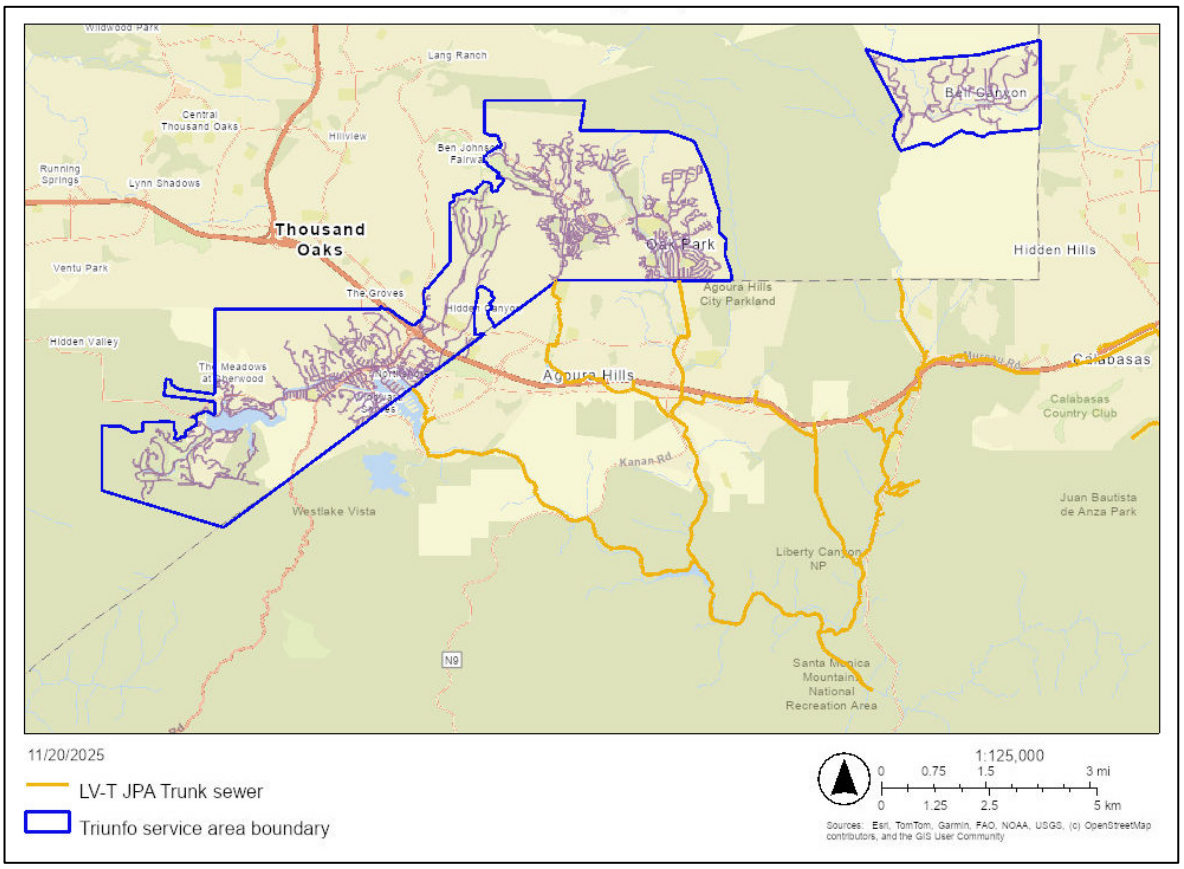
This Sewer System Management Plan (SSMP) has been developed by the Triunfo Water & Sanitation District (TWSD) to comply with California State Water Resources Control Board Order No. 2022-0103-DWQ Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDRs). On December 6, 2022, the State Water Resources Control Board adopted the WDRs requiring owners and operators of collection systems to apply for coverage and abide by its provisions and prohibitions. Its purpose is to prevent sanitary sewer overflows (SSOs) and establish uniform procedures for monitoring and reporting.

On October 13, 2006, TWSD applied for coverage under the previous order (No. 2006-0003-DWQ) by submitting a Notice of Intent (NOI) to the State Water Board. On January 18, 2007, TWSD obtained an account on the State of California SSO Database (California Integrated Water Quality System [CIWQS]). This provides TWSD with a mechanism to report Sanitary Sewer Overflows (SSOs) in accordance with the WDRs. The WDRs also require the development and implementation of the SSMP. A SSMP must include provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems while taking into consideration risk management and cost benefit analysis. Additionally, a SSMP must contain a spill response plan that establishes standard procedures for immediate response to an SSO in a manner designed to minimize water quality impacts and potential nuisance conditions.

System Description

TWSD owns and operates a sanitary sewer collection system (collection system) in eastern Ventura County serving 30,000 people in the communities of Oak Park, Bell Canyon, and Lake Sherwood and portions of the City of Thousand Oaks. The collection system consists of over 120 miles of sewer lines ranging in size from 4 inches to over 24 inches in diameter with some more than 50 years old. There are 6 pump stations located throughout TWSD that range in size from 50 gallons per minute (gpm) up to 500 gpm providing service to those areas of geographic need. Treatment is provided at the Tapia Water Reclamation Facility, which provides preliminary, primary, secondary, and tertiary treatment for a rated capacity of approximately 16 million gallons per day average dry weather flow (mgd). TWSD is responsible for all infrastructure downstream of each wye connection to the main from private property owners. Property owners are responsible for everything upstream of the wye connections and the wye connection itself. A map of the TWSD collection system is shown in Figure 1.

Figure 1- Triunfo Water & Sanitation District Service Area



Document Organization

To fulfill the requirements of the WDRs, this SSMP contains 11 elements which detail the management, operation, and maintenance of all parts of the TWSD's sanitary sewer system.

1. Goals
2. Organization
3. Legal Authority
4. Operations and Maintenance Program
5. Design and Performance Provisions
6. Spill Emergency Response Plan
7. Sewer Pipe Blockage Control Program
8. System Evaluation, Capacity Assurance and Capital Improvements
9. Monitoring, Measurement, and Program Modifications
10. Internal Audits
11. Communication Program

At the beginning of each section, the required contents (as defined in the WDRs) are outlined to inform the reader of the section requirements. Following this introduction, each section contains the policies, practices, descriptions, and references used to address element requirements.

GOALS

Primary Goal

> ***The goal of an SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system, reduce and prevent SSOs, and contain and mitigate any SSOs that do occur.***

This SSMP has been developed and is implemented with the intent of properly managing, operating, and maintaining all parts of TWSD's sanitary sewer system. TWSD has identified specific goals that it believes are achievable through the implementation of the contents of this plan. In this regard, the SSMP establishes the following goals:

1. Minimize the frequency of SSOs

2. Appropriately mitigate the impacts caused by SSOs

3. Provide notifications and reports to all required regulatory agencies in a timely manner

4. Effectively manage, operate, maintain, and improve the collection system

5. Provide education and outreach to the general public to increase awareness of the sanitary sewer system, its function, and operation

Schedule

> ***Include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of SSOs.***

Audits of this SSMP will occur twice before the next update is prepared in 2031. These audits will be initiated in August 2027 and August 2030. Each audit will be completed within 6 months of initiation. The next update of the SSMP will be completed by August 2031.

ORGANIZATION

The SSMP must identify organizational staffing responsible and integral for implementing the plan through an organization chart or similar narrative including:

a) The name of the Legally Responsible Official of the General Order.

b) The position titles, telephone numbers, and email addresses for management, administrative, and maintenance positions responsible for implementing specific measures in the SSMP program.

c) Organizational lines of authority.

d) The chain of communication for reporting SSOs, from receipt of a complaint or other information, including the person responsible for reporting SSOs to the State and Regional Water Board and other agencies if applicable (such as County Health Officer, County Environmental Health Agency, Regional Water Board, and/or State Office of Emergency Services (OES)).

The administration and implementation of the SSMP is directed through the TWSD's office located at:

370 Westlake Boulevard, Suite 100

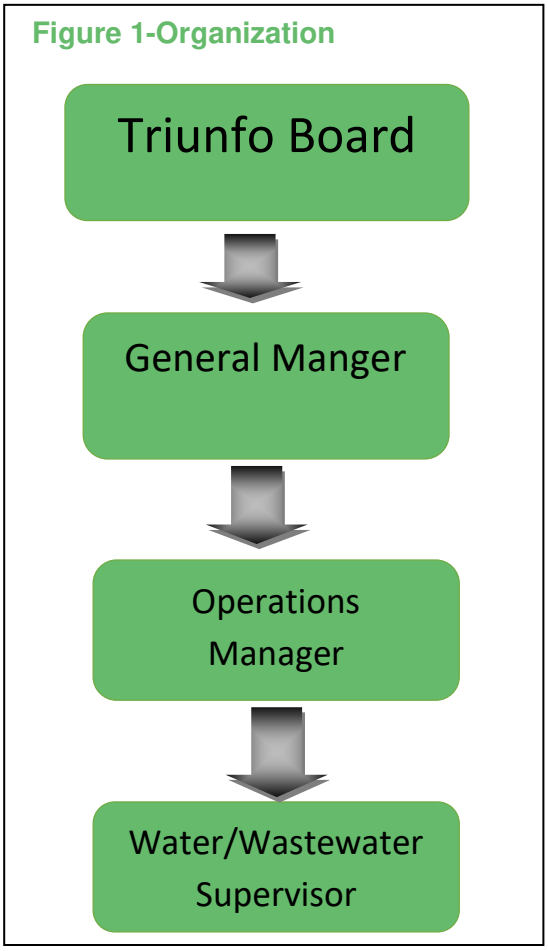
Westlake Village, CA 91362

Phone: (805) 658-4643

Authorized Representatives

The Legally Responsible Official for TWSD per the General Order is the Operations Manager. TWSD has authorized certain individuals to serve as Authorized Representatives for all sanitary sewer related issues in TWSD's service area. The Operations Manager is authorized to sign and certify all reports required by the State WDRs and other information required by the State or Regional Water Board and electronically sign and certify reports made through CIWQS.

Figure 1-Organization



Administrative and Maintenance Personnel

TWSD employs 20 individuals to manage, operate, maintain, and improve the sewer system. The Operations Manager provides immediate oversight of all sanitary sewer related issues. Figure 1 indicates the chain of command by which the Operations Manager receives direction from the Triunfo Board through the General Manger. Tables 1 and 2 below give the titles, phone numbers, and email addresses of positions responsible for implementing the SSMP and the positions responsible for implementing specific elements of the SSMP, respectively. These tables are key components to the proper implementation of the SSMP and its effectiveness.

Table 1 - Responsible Positions

Position	Phone Number	Email
General Manager	805-658-4621	marknorris@triunfowsd.com
Operations Manager	805-658-4643	davidrydman@triunfowsd.com
Water\Wastewater Supervisor	805-658-4687	justinrobbins@triunfowsd.com
Environmental Resources Analyst	805-658-4658	arikbaharouzi@triunfowsd.com
Public Information Officer	805-600-1576	beckyhaycox@triunfowsd.com

Table 2 - Responsible Staff for SSMP Elements

Element	Responsible Staff
I. Goals	•General Manager •Operations Manager •Water/Wastewater Supervisor
II. Organization a. Name of the Responsible or authorized representative(s) b. Names and telephone numbers of management, administrative, and maintenance positions c. Chain of communication for reporting SSOs	•General Manager •Operations Manager •Water/Wastewater Supervisor
III. Legal Authority a. Prevent illicit discharges to the collection system b. Require that sewers and laterals be properly designed and constructed c. Ensure access to the collection system d. Limit discharge of FOG and other debris that may cause blockages **e.** Enforcement of Ordinance	•District Legal Counsel •Operations Manager •Water/Wastewater Supervisor •Environmental Resource Analyst
IV. Operations and Maintenance Program a. Maintain current map of collection system and storm drain system b. Describe routine and preventative operation and maintenance of collection system c. Develop a rehabilitation and replacement plan. d. Develop and implement a training program e. Provide equipment, training, parts, and inventories	• Operations Manager • Water/Wastewater Supervisor • Water/Wastewater Workers
V. Design and Performance a. Design, construction and specification standards for installation and rehabilitation of new and existing sewers. b. Procedures and standards for the inspection of new or rehabilitated sewers and appurtenances.	• District Engineering Manager • Operations Manager • Water/Wastewater Supervisor
VI. Spill Emergency Response Plan a. Notification procedures for regulatory agencies b. Response and mitigation procedures c. Staff and contractor training d. Emergency operations e. Containment and monitoring plans	•Operations Manager •Water/Wastewater Supervisor •Water/Wastewater Workers

Element	Responsible Staff
VII. Sewer Pipe Blockage Control Program a. Identification of "Hot Spot" areas of collection system b. Identification of food service establishments (FSEs) in "hotspot" areas of collection system c. Administrative controls (permits) for potential grease dischargers d. Requirement to install grease removal equipment e. Encouragement to use BMPs to reduce grease discharges f. Periodic inspections g. Enforcement actions h. Public Education	• Operations Manager • Water/Wastewater Supervisor • Environmental Resource Analyst
VIII. System Evaluation, Capacity Assurance and Capital Improvements a. Capacity evaluation b. Identification of capacity needs c. Project schedule	• Engineering Program Manager • Operations Manager
IX. Monitoring, Measurement, and Modifications a .Maintain records and data b. Monitor implementation of SSMP c. Assess the success of preventive maintenance program d. Update program elements e. Identify and track SSO trends	• Operations Manager • Water/Wastewater Supervisor • Environmental Resource Analyst
X. Internal Audits a. Person responsible for the Audit b. Scope of the Audit c. Audit work product d. Schedule for the Audit, minimum every two years	• General Manager • Operations Manager • Water\Wastewater Supervisor • Environmental Resource Analyst
XI. Communication Program a. Notification that an SSMP is being prepared. b. Procedure for notifying the public of a SSO c. Procedure for the public to provide input d. Identification of upstream systems and contacts for those systems that connect to TWSD's sewers	• Operations Manager • Water\Wastewater Supervisor • Public Information Officer

SSO Chain of Communication

SSOs in TWSD's service area are typically first observed by operations staff, members of the public, or staff from other agencies. TWSD regularly provides information to customers via its website, monthly Water News emails to customers, bill message and inserts, and social media posts about how to report SSOs. TWSD provides a 24-hour dispatch service to receive reports of SSOs and other customer concerns. Information received through this 24-hour dispatch service is immediately conveyed to on-call operations staff. TWSD has at least one operations staff member on call at all times. When operations staff are made aware of a potential SSO, they are required to visually confirm it, notify their supervisor and, initiate a plan to eliminate the SSO. Supervisors notify the Operations Manager and the Operations Manager, or his/her designee, are responsible for notifying (if necessary):

TWSD General Manager and TWSD Board members

California Office of Emergency Services at (800) 852-7550

County of Ventura

Environmental Health Division

(805) 654-2813

Prop 65 Report - https://docs.vcrma.org/images/pdf/eh/info/Prop65-Report-Form2022.pdf

Watershed Protection Division

(805) 654-2018

State Water Resources Control Board using the CIWQS system

LEGAL AUTHORITY

The plan must include copies or an electronic link to the current sanitary sewer system use ordinances, service agreements, or other legally binding procedures to demonstrate the Enrollee possesses the necessary legal authority to:

a) Prevent illicit discharges into its sanitary sewer system from infiltration, inflow (I/I), stormwater, chemical dumping, unauthorized debris and cut roots, FOG, trash, rags, etc.);

b) Collaborate with storm sewer agencies to coordinate emergency spill responses, ensure access to storm sewer systems during spill events, and prevent unintentional cross connnections of sanitary sewer infrastructure to storm sewer infrastructure

c) Require that sewer system components and connections be properly designed and constructed;Ensure access for maintenance, inspection, or repairs for portions of the lateral owned or maintained by the Public Agency;

d) Limit the discharge of fats, oils, and grease and other debris that may cause blockages, and

e) Enforce any violation of its sewer ordinances, service agreements, or other legally binding procedures.

f) Obtain easement accessibility agreements for locations requiring sewer system operations and maintenance

This SSMP is supported by TWSD's legal authority under adopted resolutions and/or ordinances. Enforcement and source control activities are authorized under the federal (EPA programs) requirements, the California Regional Board's (RWQCB) Order, and the *Exercise of Powers Agreement* between the Las Virgenes-Triunfo Joint Powers Authority (LVMWD) and TWSD. The elements of sewer system management are prescribed in ordinances and/or resolutions available at https://www.triunfowsd.com/public-information/.

The following summarizes TWSD's legal authority:

Illicit Discharges

TWSD's Ordinance Nos. TSD 200 and TWSD 202 as well as Part 403 of Title 40 of the Code of Federal Regulations (40 CFR Part 403) provide legal authority to TWSD to prevent illicit discharges to the sewer system. These sections include prohibitions against the discharge of any material or waste that could harm the collection system, wastewater treatment facility, or jeopardize the safety of TWSD's collection system personnel.

Design and Construction

Sewer lines and sewer connections constructed and conveyed to TWSD are required to meet the criteria contained in TWSD's Rules and Regulations for the Sewage Collection System, Greenbook Standard Specifications for Public Works Construction, and the latest edition of the Uniform Plumbing Code.

Access

TWSD has secured sewer easements to ensure access for maintenance, inspection, or repairs of TWSD owned collection systems on private property. TWSD has a variety of methods for obtaining easements to construct and maintain sewer lines through private property:

1. Acquisition of the easement through voluntary purchase from the owner

2. Acquisition through condemnation for a sewer line easement

3. As a condition of development, the property owner is requested to dedicate or grant an easement to TWSD for sewer line installation

These easements permit TWSD to conduct periodic and scheduled sewer line cleaning to prevent SSOs. If there is a problem in a sewer line in an area where TWSD staff have been unable to acquire a sewer easement, the Ventura County Environmental Health Department has the authority to order the house vacated due to lack of sewer services.

Enforcement

Enforcement of the SSMP and any violation of TWSD Ordinances is provided by Ordinance No. TSD 200.

Coordination and Collaboration

TWSD operates within the jurisdictions of unincorporated Ventura County and the City of Thousand Oaks. The storm sewer systems within these areas are operated and maintained by either the County of Ventura or the City of Thousand Oaks. TWSD's staff can view GIS maps of all Ventura County and City of Thousand Oaks storm sewer systems overlaid on GIS maps of TWSD's sanitary sewer system through TWSD's asset management system software used every day by TWSD operations staff. Each Operations staff member is assigned a smart cellular phone and either an electronic tablet or laptop computer with access to this software. In addition, TWSD staff maintain regular communication with operations staff from both the County's and City's road, sewer, and stormwater divisions. TWSD has received approval from both the City and the County to access their storm sewer systems to investigate SSOs and recover materials from these systems before any spill reaches a receiving water body. However, in the event of an SSO, TWSD also contacts the operations staff at the City or County to make them aware and provide notification for that agency to confirm that the SSO has been completely cleaned up and their infrastructure has not been damaged. As an added benefit, both the City of Thousand Oaks and the County of Ventura operate their own sanitary sewer systems, maintain equipment and materials for responding to SSOs, and are available to assist TWSD in the event of larger SSO events through interagency agreements.

OPERATIONS AND MAINTENANCE PROGRAM

The SSMP must include the items listed below that are appropriate and applicable to the Enrollee's system:

a) ***An up-to-date map 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 all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and applicable stormwater conveyance facilities.***
b) ***A scheduling system and a data collection system for preventive operation and maintenance activities by staff and contractors. The scheduling system must include inspection and maintenance activities, higher-frequency inspections and maintenance of known problem areas (including areas with tree root problems), and regular visual and closed-circuit television (CCTV) inspections of manholes and sewer pipes. The data collection system must document data from system inspection and maintenance activities including system area/components prone to root-intrusion potentially resulting in system backup and/or failure.***
c) ***In-house and external training provided on a regular basis for sanitary sewer system operations and maintenance staff and contractors covering the requirements of the order, spill emergency response, spill volume estimating, and CIWQS reporting procedures.; and***
d) ***An inventory of sewer system equipment, including identification of critical replacement parts.***

Operation and maintenance activities at TWSD are performed regularly and tracked through GIS based technology. TWSD staff maintain a GIS database containing information on all aspects of the sewer system. Each manhole, pump, and line segment is designated as an asset and assigned an identification number (asset ID). This information is used to aide operations and maintenance staff in their efforts to clean the entire sewer system every 36 months.

In addition to regular cleaning, TWSD maintains up-to-date maps and a rehabilitation and replacement plan. It also provides regular training for staff and maintains equipment and replacement part inventories. All of these are components of the operations and maintenance program and help ensure a properly maintained sewer system.

Sewer Maps

TWSD maintains a GIS based asset mapping and management system of up-to-date locations of all its sanitary sewer system facilities (gravity and force main segments, manholes, pumping facilities). All operations staff can view these assets using cloud based software on their portable handheld devices and printed maps can also be generated as necessary. This GIS database also includes the potable and recycled water systems TWSD operates as well as the entire storm drain system throughout Ventura County. As-built drawings of the entire sewer system are referenced in this database and can be accessed electronically from any TWSD computer. All paper originals are stored at the Oak Park office.

Preventive Operation and Maintenance

Staff perform a variety of operations and maintenance activities to ensure the reliable performance of the collection system. Lift stations are monitored through a Supervisory Control and Date Acquisition (SCADA) system multiple times each day and are inspected in-person on a weekly basis. Inspection checklists are completed in the asset management system each week. In the event of a power outage, 5 of the 6 TWSD lift stations are equipped with backup diesel generators. The lift at the sixth station is fairly insignificant so that in the event of a power outage, it can operate temporarily without a portable generator by gravity from the wet well after it has filled to level sufficient to reach the overflow outlet.

Sewer lines are cleaned of roots, debris, grease, etc. at regular intervals based on historic monitoring. Sewer cleaning is performed by using high pressure hydro-jetting equipment, root cutters, and other equipment. Observations of the discharge from sewer lines that are cleaned are recorded in the asset management system for future reference. Follow-up tasks are created and assigned to appropriate staff in the asset management system. As cleaning is performed on sewer lines, staff also perform visual inspections of manholes to check for evidence of surcharge, vandalism, structural damage, infiltration and inflow (I/I), root intrusion, and debris build-up. Necessary work orders on these manholes are then created, scheduled, and completed using the asset management system. Assets can then be queried based on issues observed, staff who worked on them, date of activity, type of preventative or reactive maintenance performed, or area of the collection system.

The record completed when a sewer line is cleaned includes the following information:

- Date and time of cleaning
- Method of cleaning
- Names of staff of contractors who completed the cleaning
- Location and cause of any blockage
- Recommendation of necessary further actions
- Whether the segment should be added to a list of “Hot Spots” that are monitored more frequently
- Observations (grease, roots, rags, INI, debris, odors, vermin)
- Recommended cleaning frequency

Closed circuit television (CCTV) is also used to inspect manholes and sewer mains. During cleaning, tasks are created in the asset management system to CCTV sections of sewer main that are difficult for the hydro-jetter to travel through, show signs of damage, or are impacted by roots. These sections of sewer main are subsequently inspected using CCTV equipment. In addition, TWSD schedules routine CCTV inspections of sewer mains with the goal of generally inspecting the entire system over a 10-year period.

Whenever CCTV or hydro-jetting confirms a section of sewer main is abnormally impacted by sags in the line, roots, debris, grease, or vermin, these sections are noted in the asset management system as “Hot Spots” and are subsequently inspected and cleaned with the hydro-jetter on a more frequent basis. Once a location is deemed a Hot Spot, it remains designated as such until a capital improvement project, regular pretreatment inspections for FOG (fats, oils, and grease), or documented change in customer behavior eliminates the particular issue.

The use of the asset management system eliminates all paper records. Operations staff are able to input and review all information at any time in the asset management system, and supervisors are able to review status and work completed without waiting on paper reports to be completed or inputted.

Training

TWSD staff receive on-going training to enhance their job knowledge, skills, and abilities. Initial trainings are conducted upon initial hire and are revisited as needed. These trainings include but are not limited to:

- The Statewide Waste Discharge Requirements / General Order for Sanitary Sewer Systems
- SSO/Spill Emergency Response Plan (refresher training every year)
- Sewer cleaning
- Manhole inspection and root removal
- Lockout/Tag out Procedures
- Confined Space Entry and Rescue
- General Safety–PPE
- Traffic Control
- Pump Station Operations, Maintenance, and Inspection
- Spill volume estimation
- CIWQS reporting

Equipment Inventory

TWSD utilizes several vehicles and various equipment to maintain the sewer system. Among the vehicles in operation are:

- One high pressure hydro-jet truck.
- One push camera used to probe manholes and inspect sewer lines upstream and downstream from a manhole location
- Three utility trucks – one with a small crane rated for 3,500 pounds, one equipped for electrical and mechanical maintenance and repairs, and one equipped for confined space entry and repairs.
- One trailer mounted auxiliary booster pump. Each lift station is equipped so this auxiliary booster can be quickly installed to bypass the station in the event of a critical failure or the need for additional pumping capacity.

Each vehicle is stocked with tools and supplies needed for the maintenance of the sewer collection system. TWSD also maintains an inventory of temporary hoses, sump pumps, hand tools, rings and covers for manholes, and spare bolts and fittings. TWSD utilizes contract services to collect CCTV as needed. TWSD also rents an easement trailer whenever there is a need to clean sewer lines on easements that are not accessible by the hydro-jet truck.

DESIGN AND PERFORMANCE PROVISIONS

The Plan must include the following items as appropriate::

a) 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 appurtenances. If existing design criteria and construction standards are deficient to address the necessary component specific hydraulic capacity, the procures must include component-specific evaluation of the design criteria.

b) Procedures and standards for the inspection and testing of newly constructed, newly installed, repaired, and rehabilitated system pipelines, pumps, and other equipment and appurtenances.

Design Criteria and Construction Standards and Specifications

TWSD has developed design standards that are used for capital projects, repairs, replacements, and new installations of sanitary sewer mains, pump stations, and other appurtenances. All design and construction is subject to the approval of a licensed engineer. To facilitate and streamline the approval process, TWSD has developed design guidelines for construction of sewer projects which are contained in the *Rules and Regulations for the Sewage Collection System* available at http://www.triunfowsd.com. In addition to these standard drawings, TWSD uses the Greenbook Standard Specifications for Public Works Construction and the Uniform Plumbing Code for guidance on sewer design. In addition to specific design guidelines, Ordinance TWSD 200 provides directions on where and how sewer lines should be installed.

These documents and guidelines set forth various sewer construction requirements that ensure the proper function of the sewer system. When plans are submitted to engineering staff, they are closely reviewed for sewer line sizing, depth, clearances, manhole spacing, etc. As the review process progresses, the plans meeting all required specifications will be approved for project construction. When construction is not approved, affected parties are notified of the plan discrepancies.

Inspection and Testing

While installing new sewers, pumps, and other appurtenances, testing and inspection of the new sewer system is performed to ensure quality installation. TWSD employs contract construction inspectors who, among other things, inspect the installation of public works projects. Private sewer systems are inspected by the Building and Safety Departments of the City of Thousand Oaks and County of Ventura. Inspectors use the Greenbook Standard Specifications for Public Works Construction and the Uniform Plumbing Code to ensure sewer systems are installed properly. They use inclinometers, air tests, water tightness tests, video surveillance and other tests to inspect sewer installation.

When new manholes are installed, they are visually inspected to determine if there are any conditions which are characteristic of inflow or infiltration (I/I). Video pole cameras are used in hard-to-see areas to aide in the I/I evaluation. Furthermore, all new sewer lines are televised after installation is complete. This video and additional inclinometer testing help determine if sewer systems have been built according to design specifications.

SPILL EMERGENCY RESPONSE PLAN

The Plan must include an up-to-date spill response plan to ensure prompt detection and response to spills to reduce spill volumes and collection information for prevention of future spills.:

TWSD utilizes a systematic approach to spill response and notification procedures. Staff review this document on a regular basis in an effort to maintain and improve public and environmental health. TWSD has developed this plan to guide its response to and recovery from a sewer spill to be consistent with Board Order WQ 2-22-0103 DWQ (Order). In addition, TWSD's asset management system includes a module for staff to use to log the work done in response to a sewer spill and keep track of all notification, monitoring, reporting and record keeping requirements of the order.

Notification and Response Procedures

TWSD can receive notice of a spill from multiple sources. When dispatch or any staff receive word of a potential spill, they forward this information to operations staff immediately. All operations staff carry company cell phones and at least one staff person is on-call at all times. When notified of a spill during normal business hours, staff communicate this information through live channels (not just messages, emails, or voicemails) to either the Operations Manager or a Water/Wastewater Operations Supervisor who coordinate a response. Any notification of a spill received outside of normal business hours is routed to the on-call staff person who similarly notifies the Operations Manager or a Water/Wastewater Operations Supervisor.

Communication follows a defined procedure to ensure that all spills are reported and responded to in an appropriate manner. Primary responders (usually a Water/Wastewater Worker) are notified of a potential spill and respond to the location in question. Upon arrival, primary responders relay information back to the Operations Manager or Water/Wastewater Operations Supervisor who in turn notify responsible entities as defined in this section. Concurrently with notification procedures, primary responders work to correct the problem and minimize its effects.

The Operations Manager is responsible for communicating the information to the General Manager, Legal Counsel, the Board of Directors, local officials, and the appropriate regulatory agencies, as necessary. Depending on the location and extent of the spill, the following agencies or organizations may also be notified.

County of Ventura – for any spill in Oak Park, Lake Sherwood, or Bell Canyon reaching a drainage facility
Bell Canyon Owners Association – for any spill in Bell Canyon that reaches Bell Creek
Lake Sherwood Homeowners Association – for any spill that reaches Lake Sherwood
Oak Park Municipal Advisory Council – for any spill that reaches Medea or Lindero Creeks
Rancho Simi Parks and Recreation – for any spill that reaches Oak Canyon Park or Medea/Lindero Creeks
City of Thousand Oaks – for any spill within the City that reaches the storm drainage system
City of Westlake Village – for any spill that reaches Westlake Lake
California Office of Emergency Services – for any spill over 1000 gallons or to a creek or lake
State Water Resources Control Board – notified of all spills through the CIWQS system
Ventura County Sheriff or California Highway Patrol – for major spills requiring traffic or crowd control
Los Angeles County – for any spill that enters the drainage system network within Los Angeles County

Monitoring and Reporting Requirements

TWSD staff keep records of all monitoring required by the CIWQS reporting system using a standard form in the asset management software that includes all the information required for reporting a spill in the CIWQS system. The Water/Wastewater Operations Supervisor reviews the completed form and the Operations Manager compiles this information along with any additional documentation produced during the spill response and reports the required information about each spill in the CIWQS Sanitary Sewer System Database consistent with the reporting deadlines defined in the Order.

Training, Implementation, and Post-Spill Assessments

TWSD provides annual refresher training on the Spill Emergency Response Plan for all personnel involved in a response. In these training courses, the plan is reviewed and discussed to ensure proper procedures are understood. Real life experiences and scenarios are shared and reviewed to enhance training sessions.

During a spill event, TWSD management staff maintain regular communication with field staff to verify the response is consistent with this plan, conduct at least one site visit during the event, and conduct a debrief meeting following the event. During the debrief meeting, management review all forms that were completed during the event, review the CIWQS reporting requirements with staff to ensure all required action has been completed and information obtained, and discuss lessons learned and any after action recommendations to modify TWSD's future responses.

Emergency Operations to Minimize Impacts

The primary objective when a sewer spill occurs is safety. The three components of safety that TWSD focuses on are public safety, staff safety, and environmental safety. Procedures such as traffic control and crowd control may be necessary as most spills occur from manholes that are in the public right of way. Field staff are equipped with traffic cones, barricades, warning signs, caution tape, and other items that enable the control of traffic and crowds during minor events to ensure public safety. In the event of a major spill, other TWSD staff, law enforcement, and fire personnel may be contacted to assist in emergency operations. These crews are experienced in closing lanes or streets, establishing detour routes, crowd control, and other emergency operations. Traffic and crowd control are also used to protect field staff in the work area by providing a reasonable buffer for them to complete the necessary tasks to stop the spill.

Personal Protective Equipment is used to mitigate risks to TWSD staff during spills. Staff are provided with gloves, waterproof boots, and eye protection for their normal work shifts as the first line of defense when working with raw sewage. Work uniforms are laundered by contract vendors so that staff do not have to personally transport or clean their soiled laundry.

Sandbags are used by TWSD staff to contain the spill in a temporary location away from the public. They can be used to pond the water on the ground surface or to contain it within a storm drain until it can be removed. This is done for environmental safety to prevent the introduction of raw sewage into a water of the State by containing it in a controlled location until the cause of the spill has been corrected.

Once the area has been made safe and the spill is contained as best as possible, staff work to identify and remove whatever blockage is preventing the normal flow of sewage in the collection system. Most spills are mitigated using equipment readily available for TWSD in emergencies. TWSD utilizes a hydro jetting and vacuum combination truck at manhole locations to remove most blockages causing spills. In the event of a prolonged spill, TWSD has auxiliary pumps that can be used to bypass sewage around the blockage causing the spill by pumping the sewage from one

manhole to another. Sandbags are prefilled and stored throughout the TWSD service area for quick use in both containing spills (as discussed above) and temporarily routing a spill on the road or ground surface to a location where it can be reintroduced into the sewer collection system.

Once the sewer collection system is operating correctly again, staff transition to recover any sewage that has reached the drainage system and clean the impacted area to return it to pre-spill conditions. TWSD has coordinated with the County of Ventura and has GIS data on the location of all drainage systems in its service area. TWSD staff confirm the extent any sewage has traveled down the drainage system and use the combination vacuum machine to remove all sewage that has entered the drainage. TWSD staff notify the County of Ventura or City of Thousand Oaks of the extent of cleaning that is done on the drainage system following any spill. TWSD staff also use the hydro-jettting feature to wash out the drainage system, recapture this water downstream of the spill, and discharge the captured water into the sewer collection system. Once the spill has been cleaned, staff clean/remove all sandbags and devices that were used to contain the spill and either properly dispose of them or store them for reuse.

This plan is designed to ensure that all reasonable steps are taken to contain and prevent the discharge of sewer overflows to waters of the State or any drainage conveyance system. While the proper implementation of this plan will prevent most discharges to waters of the State, there are situations when these waters become affected. Should this occur and if receiving water monitoring becomes necessary, the receiving water is observed and sampled in accordance with the sampling requirements of the Order. In addition, TWSD staff post temporary signage warning the public of the spill and directing them to stay away from the area until the water quality returns to acceptable levels.

Interagency Coordination

TWSD has developed strong working relationships with staff from the County of Ventura and the City of Thousand Oaks. Both agencies have similar maintenance equipment that can be used to assist, if necessary, in the event of a spill that TWSD cannot handle alone with its own forces. In addition, the County of Ventura has provided TWSD with GIS mapping of the storm drainage system throughout Ventura County so that TWSD staff can readily assess the potential travel paths for sewage that does get into the drainage network, contain it, and remove it prior to raw sewage reaching a water of the State. TWSD is also a member of CalWARN, a mutual assistance agreement and process for sharing emergency resources among members statewide consistent with the Standardized Emergency Management System and National Incident Management System.

Annual review of Spill Emergency Response Plan

TWSD reviews this plan on an annual basis to ensure that it is current and reflects lessons learned from prior years. This is done during the annual refresher training with staff. Simple edits are made to the plan by the Operations Manager and the plan is redistributed to staff and uploaded to the CIWQS website, if necessary. The plan undergoes a thorough update every 6 years as part of the full Sewer System Management Plan review required by the Order.

SEWER PIPE BLOCKAGE CONTROL PROGRAM

The plan must include procedures for the evaluation of the Enrollee's service area to determine whether a sewer pipe blockage control program is needed to control fats, oils, grease, rags, and debris. If an Enrollee determines that a program is not needed, the Enrollee must provide justification for why it is not needed. This plan shall include the following as appropriate:

a) An implementation plan and schedule for a public education outreach program that promotes proper disposal of pipe-blocking substances;
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
c) The legal authority to prohibit discharges to the system and identify measures to prevent spills and blockages;
d) Requirements to install grease removal devices (such as traps or interceptors), design standards for the removal devices, maintenance requirements, best management practices requirements, record keeping and reporting requirements;
e) Authority to inspect grease producing facilities, enforcement authorities, and whether the Enrollee has sufficient staff to inspect and enforce the FOG ordinance;
f) An identification of sanitary sewer system sections subject to FOG blockages and establishment of a cleaning maintenance schedule for each section; and
g) Implementation of source control measures for all sources of FOG discharged to the sanitary sewer system for each section identified in (f) above.

TWSD has determined it benefits from a fats, oils and grease (FOG) source control program and has implemented various policies and practices in an attempt to limit FOG disturbances to the sewer system. This program is administered by Administration and Operations staff.

Public Education

Public education and outreach about proper disposal of fats, oils, and grease (FOG) is accomplished through multiple channels. The primary means of educating customers about FOG is through TWSD's annual inspection program for food service establishments (FSEs). During these inspections, TWSD staff check drains, grease interceptors, waste oil containers, maintenance records, and employee training records to verify compliance with TWSD's Pretreatment Ordinance. TWSD issues annual permits to FSEs following these inspections that document the findings of the inspection and the required actions the FSE needs to take to remain in compliance.

TWSD provides one-page handouts to new businesses about proper disposal of FOG. At least once per year, the insert included with customer water bills and TWSD's e-NEWS letter highlights the importance of proper FOG disposal. During the holiday season each year, TWSD posts about proper FOG disposal on social media channels (YouTube, Facebook, X, Linkedin), and TWSD also maintains a page on its website with information about proper disposal of wastes. These efforts educate business owners and residents about FOG and its effect on the sewer system.

FOG Disposal

The proper disposal of FOG, rags, and debris is the responsibility of home or business owners. For the most part, used oil is collected and disposed by private vendors outside of TWSD' service area. TWSD does not provide solid waste disposal services. As mentioned above, TWSD staff visit FSEs annually to verify compliance with TWSD's Pretreatment Ordinance as well as local, state, and federal codes. During these visits, facility records including waste oil disposal and grease interceptor maintenance are checked to ensure proper disposal of FOG. In addition, TWSD staff provide education and offer educational materials that inform how to properly dispose of FOG. In the event the records or devices inspected are not being properly kept or maintained to prevent FOG from reaching TWSD's sewer system, TWSD staff require FSEs to adjust their procedures accordingly. TWSD's Ordinances 200 and 202 have established fines and penalties that are assessed to FSEs for non-compliance up to and including discontinuation of sewer service.

Legal Authority

TWSD has the legal authority to prohibit discharges of FOG to the sanitary sewer system. This is accomplished through Ordinance No. TWSD-202 that codifies TWSD's Pretreatment Program and under Title 40 of the Federal Code of Regulations (CFR) Part 403, which prohibits large amounts of grease and other viscous materials from constricting the flow in the sewer system. Part 403 requires users to separate FOG to the maximum extent practicable for off-site disposal and requires restaurants seek a determination on whether or not a grease interceptor must be installed. Ordinance No. TWSD-202 requires users to properly maintain their interceptors utilizing the 25% rule and establishing other standards for regular interceptor cleaning.

Requirements for Grease Removal Devices

The requirement for an FSE to install a grease interceptor is primarily established by the local jurisdiction under the Uniform Plumbing Code – either the City of Thousand Oak or the County of Ventura. Ordinance No. TWSD-202 also mandates that FSEs "install, operate, and maintain an approved grease interceptor." Interceptors are sized and designed in accordance with the Uniform Plumbing Code. Additional interceptor requirements including accessibility, tee, and sample box requirements are found in the Uniform Plumbing Code.

In addition to sizing and installation requirements, Ordinance No. TWSD-202 requires that interceptors are properly maintained at all times. An interceptor is not considered to be properly maintained if for any reason the interceptor is not in good working condition or if the operational fluid capacity has been reduced by more than 25 percent by the accumulation of floating material, sediment, oil or grease, or other liquids that have limited or no solubility in water. It also requires the entire contents of the interceptor to be removed from all chambers and sample box when it is cleaned.

TWSD requires permitted industrial users to keep records of waste hauling, reclamations, wastewater pretreatment, monitoring device recording charts and calibration reports, effluent flow, and sample analysis data, on the site. Records must be kept onsite for a minimum of two years.

Authority to Inspect

Ordinance No. TWSD-200 provides the authority to TWSD staff to inspect businesses in order to ascertain if requirements are being met. It requires users to provide access and have personnel available who are knowledgeable of all facility processes. Operations staff of TWSD administer the inspection program and there are sufficient staff to inspect and enforce the FOG ordinance.

FOG Problem Areas, Maintenance Schedule and Source Control

Areas throughout TWSD that have been subject to FOG blockages or have been documented through TWSD's CCTV program as being prone to FOG deposits are identified as Hot Spots. These Hot Spot locations are documented in TWSD's asset management system and preventative maintenance work orders are generated to inspect and clean these Hot Spots on a more frequent basis. During annual FOG inspections, TWSD staff may provide FSEs with photographic documentation whenever their sewer laterals have been surveyed and found to be impacted by FOG The annual FOG inspection report and permit documents these issues so that the issues can be documented, corrected, and inspected for compliance.

System Evaluation and Capacity Assurance Plan

System Evaluation and Condition Assessment

> ***The Plan must include procedures to evaluate…sewer system assets…, identify and justify the amount of the system to be assessed each year, prioritize areas that hold a high level of environmental consequences if vulnerable…, assess the system using visual and video methods, maintain recordkeeping of system evaluation, and identify assets vulnerable to climate change.***

TWSD performs regular assessments of it infrastructure using both sensory and CCTV inspections. The primary evaluations and assessments are accomplished through weekly inspections of facilities to monitor for changes in appearance, sound, smell, vibration, and performance. More in-depth preventative maintenance inspections are conducted annually of all lift stations. TWSD staff and contractors perform CCTV inspections and rate manholes and pipes according to the NASSCO Pipeline Assessment and Certification Program (PACP). This standard provides consistency and uniformity in the sewer line inspections and increases confidence in resulting data. It provides a mechanism whereby sewer lines are rated. Sewer lines are rated on a scale of 1 to 5 per PACP standards:

- Grade 1-Acceptable structural condition
- Grade 2-Minimal collapse risk
- Grade 3-Collapse unlikely in near future
- Grade 4-Collapse likely in foreseeable future
- Grade 5-Collapsed or collapse imminent

The amount of sewer pipeline that is inspected through CCTV each year is determined based upon the findings of annual cleaning. Areas of the system that show no or minimal change in debris and odor condition during cleaning are inspected via CCTV on a less frequent basis while segments that show signs of change or concern are prioritized for CCTV inspection.

As discussed above, the findings of all inspections are documented in TWSD's asset management system for easy reference. Key attributes of concern (odor, vermin, debris, discoloration) are queried by management staff on at least an annual basis to determine areas for further inspection, evaluation, or remediation.

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 and the appropriate hydraulic capacity of key system components during dry weather peak flow conditions and design storm or wet weather events. The Plan must also identify major sources that contribute to peak flows including customers, infiltration, and storm events. The Plan must consider necessary redundancy in pumping and storage capacities.***

TWSD conducted multi-week flow monitoring throughout the sewer system in 2025 during both wet and dry weather conditions. This monitoring effort confirmed there are no hydraulicly deficient areas of the sewer system during dry weather peak flow conditions. Similarly, while flows throughout the sewer system were observed to increase during the wet weather events that occurred during the monitoring period, no hydraulicly deficient areas were identified. The data from this monitoring effort was used to develop a hydraulic model for the entire distribution system. Calibration of this model similarly confirmed there are no areas of the system that are deficient for conveying sewer flows during both peak dry weather and design storm conditions.

With the exception of some specific master planned areas within the Sherwood community, the service area of TWSD is built out. As such, the hydraulic model that has been developed for the sewer system will primarily be used to assess potential impacts of in-fill and redevelopment projects and determine necessary modifications or improvements to the system that would be necessary for these projects to proceed to construction. TWSD works closely with the Sherwood Development Company to condition new development projects to construct the necessary improvements to the sewer collection system to accommodate such development.

The areas of most concern during wet weather events are the golf courses within the Sherwood community. The sewer mains in these areas parallel the natural drainage courses along the alignment of the golf course. While all manholes were originally placed outside of the original flood plain, modifications to the courses for competitive and aesthetic purposes must be monitored to ensure no unintended impoundments or flow paths of stormwater are created in the vicinity of existing manholes. TWSD has identified both the sections of sewer main that cross drainage courses and manholes located near the flood plain in its asset management system and proactively inspects these areas both in advanced of and during significant rain events.

In addition, there is strong evidence that while rain and stormwater should be kept separate from the sewer system, there may be some areas where illicit storm water connections have been made to the sewer system or infiltration may occur. Ongoing CCTV inspections help to identify and eliminate these connections as they are discovered.

Each sewer lift station has a minimum of two pumps – one duty and one standby. In addition, each lift station has a significant wet well capable of storing several hours of flow during normal periods. Back-up power supply for both pumps and the controls at each station is provided by permanent stationary generators and all but one lift station is monitored remotely through TWSD's SCADA system. Alerts for high level, low flow, power disruption, loss of communication, and other operational issues are transmitted to staff via email and trigger automated calls to TWSD's 24-hr dispatch center.

Prioritization of Corrective Action

The findings of the condition assessment and capacity assessments must be used to prioritize corrective actions. Prioritization must consider the severity of the consequences of potential spills.

When condition assessments by TWSD staff identify issues requiring corrective actions, staff create work orders in the asset management system and notify supervision. Repairs that can be made with existing equipment and labor are prioritized and scheduled. Any time staff identify the condition of a sewer main as Grades 4 or 5, the location is added to the running list of necessary capital improvement projects that are subsequently designed and put out to bid for construction.. If the problem is designated an emergency, necessary resources and personnel are procured in a timely manner. If it is not an emergency, the pipeline repair/replacement is scheduled in conjunction with other projects.

Funding rehabilitation and replacement projects is another integral part of the Rehabilitation and Replacement Plan. TWSD sets aside an amount each year in reserve as part of the budget process to cover the cost of replacement, repair, and rehabilitation projects. If this amount is not spent in the budget cycle, it carries over to subsequent years so that the reserve fund has sufficient balance to cover necessary future repairs and replacements.

Capital Improvement Plan

The capital improvement plan (planning, design, and construction) must include project schedules with completion dates, internal and external funding sources, and joint coordination between operation, maintenance, engineering, and other impacted utility agencies.

TWSD engineering staff maintain a spreadsheet of the known repairs or improvements that have been identified for not only the sewer system but also TWSD's potable and recycled water systems. The spreadsheet includes proposed scheduling, cost estimates and identified funding sources. Each year, administration, operation, finance and engineering staff review both the list of projects and available reserves and select the projects that will proceed during the year as part of the annual budget development cycle.

MONITORING, MEASUREMENT, AND MODIFICATIONS

The Plan must include an Adaptive Management section that addresses Plan implementation effectives and the steps for necessary Plan improvement including:

a) Maintaining relevant information, including audit findings, to establish and prioritize appropriate Plan activities;
b) Monitoring the implementation and measuring the effectiveness of each Plan element;
c) Assessing the success of the preventative operation and maintenance program;
d) Updating Plan procedures and activities, as appropriate, based on results of monitoring or performance evaluations; and
e) Identifying and illustrating spill trends, including spill frequency, locations, and estimated volume.

This SSMP and the programs described herein are reviewed, at a minimum, every 3 years to monitor and measure the performance of the SSMP, identify the strengths and weaknesses of current programs, and modify the SSMP as necessary. As stated above, the goals of the SSMP are to:

1. Minimize the frequency of SSOs
2. Appropriately mitigate the impacts caused by SSOs
3. Provide notifications and reports to all required regulatory agencies in a timely manner
4. Effectively manage, operate, maintain, and improve the collection system, and
5. Provide education and outreach to the general public to increase awareness of the sanitary sewer system, its function, and operation

Minimizing SSOs and keeping the system in good working order begin with maintaining all relevant information concerning the operation of the sewer collection system in the asset management system in manner that is simple to log, access, query, and display. The Operations Manager assesses the flow of information and work orders in the asset management system on a monthly basis to ensure work orders are being created, completed and closed as necessary. Each month, the Operations Manager meets with supervisorial staff to verify the system is being maintained as scheduled – sewer pipe cleaning, pump station maintenance, manhole maintenance, FOG inspections at FSEs, and asset inspections. These meetings include discussions of changes in priorities, time-of-year priorities, and findings from the month.

Records of SSOs are maintained and reviewed on both the CIQWS database and TWSD's asset management system to identify problem areas or trends. Locations of SSOs are added to the list of Hot Spots to be cleaned or inspected on a more frequent basis (at least annually) until the locations have been shown to not need more frequent cleaning. The specific data tracked in the asset management system are:

- Miles of sewer line cleaned
- Miles of sewer lines inspected
- Number of SSOs
- Causes of SSOs
- Locations of SSOs
- Volume of wastewater spilled
- Assets needing repair or replacement

Detailed information relevant to specific sewer lines, manholes, or other assets is also maintained in the asset management system which enables quick access to CCTV videos, as-built drawings, SSO details, and dates of specific line cleanings/inspections. Each year, an audit is conducted of the sewer lines and pump stations that have been cleaned and inspected over the prior 10-year period. Based on the findings of this audit, work orders for both cleaning and inspections are created for the coming 12-month period.

TWSD's asset management system is used to track the status of each element of the SSMP for its effectiveness in fulfilling the goals of the SSMP. Key statistics for a designated time period are reviewed and compared to various sewer issues including SSOs. The findings from sewer line cleaning (grease, debris, odor, vermin) are reviewed each year to increase or decrease the frequency of cleaning each segment of sewer main and dictate the focus and range of annual CCTV inspections.

Preventative maintenance schedules for lift stations have been fairly well established. Weekly inspections focus on a different aspect of the pump station each of the four weeks of the month and annual preventative maintenance SOPs continue to be effective in maintaining the lift stations in good working order.

TWSD has determined that the annual permitting process for FSEs is an effective recurrence interval to maintain customer awareness of best business practices and maintenance of grease control equipment. The annual permits issued to FSEs include findings from the annual inspections and focus areas for each FSE for the year. This interval has also been effective in discovering issues with grease control equipment in a timely manner to avoid larger maintenance issues or necessary repairs. Again, all records of inspections, findings and recommendations are maintained in the asset management system for easy reference and recollection for all staff.

Ongoing updates to procedures

Program audits evaluate the SSMP's effectiveness and explore opportunities which can lead to improvement of the sewer system. When an opportunity for improvement is found and it is determined there will be limited negative impact on other aspects of the sewer system, then the corresponding SSMP element is updated with the changes. Recommendations on program changes are included in the audits.

SSO Trends

The ultimate measurement of the effectiveness of the SSMP is the minimization of SSOs and customer complaints. Identifying trends in SSOs can be extremely valuable and help to identify problem areas. TWSD's asset management system and the CIWQS database both include detailed information about SSOs including their location, volume, cause, response time, notifications, etc. Through analysis of these databases, SSO trends can be identified that can uncover unknown issues with the sewer system. When trends are found, changes in practices, including revisions to the operations and maintenance schedule, can be made to reduce future SSOs. TWSD has experienced a range of causes for SSOs over the last 5 years. SSOs related to root intrusion occurred in areas of the system that were in difficult to access areas that had been unknowingly neglected. Because all sewer cleaning is now tracked in a GIS based asset management system, it is very easy to observe areas that have been inadvertently skipped and assign these areas for subsequent cleaning often with a larger crew to assist with notifications or traffic control. SSOs caused by calcium build up have elevated the priority of better I/I control and more attention to calcium build up removal in known problem areas with high groundwater. SSOs caused by stormwater overwhelming the sewer system have resulted in more proactive preventative maintenance and active system monitoring during predicted storm events.

SSMP PROGRAM AUDITS

As part of the SSMP, the Enrollee shall conduct periodic internal audits, appropriate to the size of the system and the number of SSOs. At a minimum, these audits must occur every two years and a report must be prepared and kept on file. This audit shall focus on evaluating the effectiveness of the SSMP and the Enrollee's compliance with the SSMP requirements, including identification of any deficiencies in the SSMP and steps to correct them.

The use of program audits is a valuable tool to assess the performance of the SSMP and to determine if any improvements or changes must be made. Audits are conducted every two years. Audits include review of the SSMP by the Operations Manager following a thorough review of the asset management system consistent with the steps described in the Monitoring, Measurement, and Modifications section. The assets and work orders in the asset management system are queried and reviewed to offer a clear representation of SSMP processes. In addition, informal discussions are held between management staff to review workflows, findings, and concerns from the year. These discussions focus on two questions essential to the audit:

1. Are the goals, requirements, and performance targets outlined in the SSMP attained through current activities and processes?

2. Are the goals, requirements, and performance targets, as they are currently outlined in the SSMP, sufficiently adequate to fulfill the provisions and prohibitions of the WDRs?

According to answers to these two questions, the SSMP is updated and revised as necessary and left in draft form.

The final work product derived from the audit process are tracked edits to the SSMP that are subsequently presented to all operations staff during the annual training on the SSMP. The changes to the SSMP are kept as drafts for the 5 years between required SSMP updates.

COMMUNICATION PROGRAM

The Enrollee shall communicate on a regular basis with the public on the development, implementation, and performance of its SSMP. The communication system shall provide the public the opportunity to provide input to the Enrollee as the program is developed and implemented.

The Enrollee shall also create a plan of communication with systems that are tributary and/or satellite to the Enrollee's sanitary sewer system.

TWSD's SSMP is adopted by the Board of Directors upon completion. At the time of adoption, TWSD staff present a summary of the various elements of the SSMP and provide an update on the status of implementation. The SSMP is also available for download on TWSD's website. Customers can contact Operations staff by phone or email to ask questions or provide feedback on any aspect of the sewer system. TWSD also provides information about the sewer system, FOG control, and wastewater treatment on TWSD's website.

TWSD Operations staff are out in the community on a daily basis implementing the elements of the SSMP and are trained to provide an overview of the work they are doing whenever members of the public have questions. A significant portion of TWSD's FOG program is annual inspections of FSEs. These inspections are used intentionally as outreach to share information not only about FOG control, but on TWSD's ongoing operations to maintain the sewer system.

TWSD is a co-member with Las Virgenes Municipal Water District of the Las Virgenes-Triunfo Joint Powers Authority (JPA) that operates and maintains the sewer trunk lines that TWSD's sewer mains discharge to, the Tapia Water Reclamation Facility that accepts, treats, and disposes the sewage, a solids composting facility, and a recycled water distribution system to dispose of the treated sewage through landscape irrigation. As such, TWSD has a very strong relationship and open lines of communication with LVMWD's staff. In addition, while there are no sewer systems tributary to the TWSD system, TWSD has developed strong relationships with the neighboring sewer agencies such as the City of Thousand Oaks and the City of Los Angeles.

Through the JPA, Triunfo provides facility tours of the Tapia Water Reclamation Plant and the solids composting facility upon request. The Class A compost produced is provided free of charge to customers that are willing to haul it from the production plant to their homes and businesses. The JPA also has constructed a demonstration facility for its planned Pure Water Project that will provide advanced treatment of recycled water so that it can be used to supplement the drinking water supply through indirect potable reuse. During tours of each of these facilities, the JPA provides information to customers about proper disposal of waste, reuse, and the importance of conserving natural resources.