

## City of Cedar Hills

# SSMP Monitoring and Measurement Plan

The purpose of this plan is to provide appropriate monitoring and measurement of the effectiveness of the SSMP in its entirety.

### Records Maintenance

Cedar Hills intends to maintain appropriate records on operations and maintenance of the sanitary sewer system to validate compliance with this SSMP. However, failure to meet standards set by State DWQ or other regulatory agency during an inspection does not constitute a violation of the SSMP. Rather, deficiencies identified during inspections should be viewed as an opportunity for improvement.

### Operations Records

Operations records that should be maintained include the following:

- Daily cleaning records
- CCTV inspections records
- Manhole inspection records
- Hot spot maintenance list
- Spot repairs
- Major repairs
- System capacity information
- SSO or basement backup records including notification documents to appropriate agencies (call logs, etc.)
- Capital Improvement Plan

Records will be maintained by the Cedar Hills Public Works Department in a central location. Records may be maintained either on an electronic record or as a paper record. The extent of the record should be sufficient to demonstrate the activity recorded was completed appropriately.

### Performance Measurement (Internal Audit)

Periodically, but not less than annually, Cedar Hills should assess and audit the effectiveness of the elements of this SSMP. All elements should be reviewed for effectiveness as well as all records should be reviewed for completeness. An internal audit report should be prepared preferably annually but no less than once every five years which comments on the following:

- Success of the operations and maintenance program
- Success of other SSMP elements
- Adequacy of the SECAP evaluations
- Discussion of SSO's and the effectiveness of the response to the event including corrective action
- Review of Defect reports and adequacy of response to eliminate such defects
- Opportunities for improvement in the SSMP or in SSO response and remediation

The annual audit report need not be extensive or long. It should, however be sufficient to document compliance with the standards set in the SSMP. The audit reports should be maintained in accordance with the City of Cedar Hills records retention schedule.

### **SSMP Updates**

When a plan deficiency is identified through an audit, inspection or plan review, and the deficiency requires an SSMP update, the plan may be updated at the discretion of the Mayor or City Manager. SSMP updates should be recorded in a revision index maintained by the Public Works Department.

### **SSO Evaluation and Analysis**

At least annually in the internal audit and more frequently as needed, Cedar Hills will evaluate SSO trends based on frequency, location and volume. Trend evaluation will be empirical unless a large number occur sufficient to make a statistical analysis viable. If a trend is identified, a corrective action may be appropriate.

### **Public Communication and Outreach**

The City of Cedar Hills will reach out to the public about the development, implementation and performance of the SSMP. This communication may be accomplished by any of the following methods:

- Public hearings
- Public meetings
- Newsletters
- Direct mailing
- Leaflets
- Other effective methods

The City of Cedar Hills will accept comments, either written or verbal and will review such comments for applicability. Public interest may be difficult to generate, but should be sought, non-the-less.

