

**United States Environmental Protection Agency  
Pacific Southwest Region (Region 9)**



**Clean Water Act Compliance Evaluation Inspection  
Alto Sanitary District Wastewater Collection System  
(Satellite Collection System to Sewerage Agency of Southern Marin  
WWTP NPDES No. CA 0037711)**

**Date of Inspection: August 9, 2007**

Inspection team: Ann Murphy, EPA  
Mark Briggs, Eastern Research Group, Inc.

Facility representatives: Tom Roberts

Report prepared by: Mark Briggs, Eastern Research Group, Inc.

Date prepared: February 11, 2008

## **USEPA Region 9 SSO Inspection Report Alto Sanitary District**

### **Background**

On 8/9/2007, USEPA Region 9 and its contractor inspected the Alto Sanitary District's (the "District") sanitary sewer system located in Mill Valley, California. Spills and sanitary sewer overflows (SSOs) from the sewer system are prohibited by the Clean Water Act. Additionally, spills and SSOs from the District's system are prohibited by Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, WQO No. 2006-0003. The District is an enrollee under the Statewide General Waste Discharge Requirements. Additionally, the Agency is also required to comply with the San Francisco Bay Regional Water Quality Control Board's July 2005 Section 13267 of the California Water Code letter that establishes earlier deadlines for submittal of Sewer System Management Plan (SSMP) components than the SSMP deadlines present in WQO No. 2006-003. As such, the Agency must comply with both the Section 13267 letter and WQO No. 2006-003 requirements. The primary purpose of the inspection was to document the history of sewage spills, determine the adequacy of the District's spill response and prevention programs, evaluate sewer maintenance activities, and assess the accuracy and reliability of their spill reporting procedures. Ann Murphy with EPA Region 9 and Mark Briggs with Eastern Research Group conducted the inspection. The District's representative during the inspection was Mr. Tom Roberts. The weather at the time of inspection was overcast.

The District owns and operates approximately six miles of gravity sewer pipe. The District has no pump stations or force mains. Sanitary sewage generated within the District flows by gravity to the Sewage Agency of Southern Marin (SASM) wastewater treatment plant. According to Mr. Roberts, the District's service area is approximately two square miles, has a population of 1,200, and has 515 sewer connections (490 residential and 25 commercial). Mr. Roberts was unaware of the wastewater flow from Alto to the SASM wastewater treatment plant since SASM bills for treatment based on the number of residential connections rather than flow. Mr. Roberts did state however that dry-weather flows to the SASM wastewater treatment plant were approximately 2.5 MGD, but could climb as high as 25 MGD during wet weather indicating significant inflow and infiltration (I&I) was entering all collection systems discharging to the SASM wastewater treatment plant. No I&I modeling studies have been conducted by Alto to limit flow to SASM. A review of the District's budget for 2007/2008 (Attachment 3) shows no money allocated for I&I control, however money has been allocated for upgrade of aging sewer lines. Since Alto is billed for treatment by SASM based on residential connections rather than flow, they have no or limited incentive to address I&I within their collection system.

The District currently and historically has had an un-written agreement with Roto-Rooter for system maintenance. This agreement is for 'on-call' sewer maintenance, blockage, and spill response. According to Mr. Roberts, if an individual calls his office to report an overflow or blockage, the individual is directed to call Roto-Rooter, which investigates and corrects the problem. Roto-Rooter then provides documentation to Mr. Roberts regarding the volume of the spill, the cause of the spill, and the corrective actions taken to mitigate the spill, along with an invoice for its services.

During the inspection, EPA tried to contact Roto-Rooter by telephone to discuss their procedures for responding to spill response. The individual at Roto-Rooter responsible for service to the Alto Sanitary District was not available to comment, and has not returned the EPA's phone call. One

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of the primary concerns with the Roto-Rooter and Alto Sanitary District un-written agreement is the potential lack of responsiveness by Roto-Rooter. Without a written agreement between the Alto Sanitary District and Roto-Rooter, no method exists to ensure if, and when, Roto-Rooter may respond to a reported spill. In addition, Roto-Rooter is located in Navato, California (approximately 18 miles from the Mill Valley area) which could lengthen response times, especially during bad weather when spills related to high I&I are most likely to occur.

Under section 301(a) of the Clean Water Act (CWA), it is unlawful for any person to discharge any pollutant from a point source into "waters of the United States" except in compliance with an NPDES permit. The District does not have an NPDES permit that authorizes the discharge of sewage spills. Therefore, any sewage spill from the District's collection system that flows to "waters of the United States" constitutes a violation of the Clean Water Act.

Attached to this inspection report are the following documents obtained during the inspection:

- Alto Sanitary District Annual Report of Sanitary Sewer Overflows for Calendar Year 2006 (Attachment 1);
- Alto Sanitary District Sewer System Management Plan as provided to the Board Members of the Alto Sanitary District (Attachment 2); and
- Alto Sanitary District Budget for Fiscal Year 2007-08 (Attachment 3).

**Findings**

**1. Occurrence of spills.** Discharges to waters of the United States without a permit are prohibited under Section 301(a) of the Clean Water Act. Additionally, as per Part C.1 Prohibitions of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, WQO No. 2006-0003, any spill that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited. The District reported two sewage spills in 2006 to the California Regional Water Quality Control Board on their annual report. Table 1 provides information regarding each spill that was included in their annual report obtained during the inspection. According to the annual report, both spills were a result of root intrusion.

A review of the San Francisco Bay Water Board Sanitary Sewer Overflow (SSO) eReporting Program Database Records (from Dec. 1, 2004 to May 2, 2007) included only one reported SSO (SSO Tracking Number 1911) in the Alto Sanitary District, and this spill occurred on September 30, 2005 and was reported on October 4, 2005. This spill was reported as 100 gallons to a storm drain and occurred as a result of an unknown blockage. Neither of the 2006 spills included on the annual report are included in the eReporting Program Database Records from December 2004 to May 2007.

**Table 1. Alto Sanitary District Reported SSOs for 2005/2006**

<b>Incident date</b>	<b>Report Date</b>	<b>Volume of Reported Spill</b>	<b>Amount Reaching Waters of the United States</b>
Nov. 10, 2006	March 22, 2007	100 gallons	0 gallons
Oct. 29, 2006	March 22, 2007	60 gallons	60 gallons
Sep. 30, 2005	Oct. 4, 2005	100 gallons	100 gallons*

\* Discharge reported to storm drain.

According to Mr. Roberts, the spills shown in Table 1 are reported by the District in the annual hard-copy report. When Mr. Roberts was asked about the reported spill in 2005, Mr. Roberts stated that he did not have any information in his office and that the files were likely available at the SASM wastewater treatment plant. The inspection team was unable to locate the spill documentation during the review of the files at the SASM wastewater treatment plant. With approximately 6 miles of sewage pipe, the Alto Sanitary District averaged 25 sewage spills per 100 miles of pipe per year for 2005 through 2006.

**2. Failure to maintain adequate records for reported and unreported spills.** As per Part B.5 of the Monitoring and Reporting Program No. 2006-0003-DWQ, the Alto Sanitary District is required to maintain records of all SSOs. At the time of the inspection, the City representatives were unable to provide supporting information for the spill in 2005, including a spill report to the California Regional Water Quality Control Board. Mr. Roberts stated the files were available at the SASM wastewater treatment plant. A review of the Alto Sanitary District files by USEPA Region 9 and their contractor at the SASM wastewater treatment plant could not locate any information on the spill from 2005. For the spills in 2006, the District provided a copy of its annual report along with a one-page spill reporting form from Roto-Rooter. A copy of Roto-

Rooter's Spill Reporting Form for the October 29, 2006 spill that reached waters of the state is provided as Attachment 2 to this report. According to Mr. Roberts, this is the only record maintained by the Alto Sanitary District regarding the spill.

- 3. Failure to contain and mitigate the impacts of an SSO.** As per Part D.3 of the State Water Resources Control Board Order No. 2006-0003-DWQ, in the event of a spill, the enrollee shall take all feasible steps to contain and mitigate the impacts of an SSO. The District does not have the equipment or training to respond to and contain spills and mitigate the impacts. The District relies on a verbal agreement with Roto-Rooter to respond to spills and correct problems which may have caused the spill. The average distance between Mill Valley and Roto-Rooter in Novato is approximately 18 miles; therefore, it is unlikely that a response time would be less than 25 minutes. Several factors could lengthen the time considerably, such as traffic on U.S. 101, large-scale wet weather events requiring additional demands on Roto-Rooter staff, etc. The response time for Roto-Rooter varies but typically ranges between one half and one hour. There is no written or verbal agreement between the District and Roto-Rooter regarding the maximum response time for SSOs. In addition, Mr. Roberts was not aware of any written operating procedure implemented by Roto-Rooter to mitigate the impacts of an SSO. Subsequently, USEPA Region 9's contractor attempted to contact Mr. Clyde Klyse at Roto-Rooter's office by telephone (415-388-2740) to discuss their operating procedure to mitigate spills. The individual answering the telephone at Roto-Rooter referred the contractor to speak with Mindy, who was unavailable. The USEPA Region 9 contractor provided his cell phone number and requested that Mindy return his call to discuss Roto-Rooter's operating procedure for mitigating spills. As of October, 2007, Mindy had not returned the call to the USEPA Region 9 contractor.
- 4. Inadequate procedures for estimating spill volumes.** As per Part A of the State Water Resources Control Board Order No. 2006-0003-DWQ, the volume of a spill or overflow must be estimated and reported. Review of the documentation for the two spills in the Alto Sanitary District in 2006 indicate the volume of the overflow is estimated by multiplying the time required by Roto-Rooter to stop the overflow by the estimated flow rate (gpm). The documentation provided by Roto-Rooter is suspect since it indicates the overflow began at the time Roto-Rooter arrived on site, not when the overflow was first identified and reported. In addition, Mr. Roberts was not aware of Roto-Rooter's method to estimate flow rate. Since Roto-Rooter has not returned a call to the USEPA Region 9 contractor, there is currently no method of evaluating Roto-Rooter's method of estimating flows.

### **Summary**

Based on the information gathered during the inspection, it appears the management and maintenance of the District's sanitary sewer collection system is primarily reactionary. The District has no equipment or staff available to contain or mitigate SSOs, and relies on Roto-Rooter to correct problems as they arise. According to Mr. Roberts, Roto-Rooter should be cleaning and repairing "hot-spot" areas within the system as part of routine maintenance as time allows; however, the EPA inspection team could find no evidence that on-going routine maintenance was being performed. According to Mr. Roberts, routine maintenance would include both cleaning and, if necessary, TV inspection of the "hot-spot" areas. Mr. Roberts did not maintain a list of hot-spot areas so the Region 9 inspection team was not able to determine if any routine maintenance was being performed. In addition, since no written contractual

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agreement has been prepared between the District and Roto-Rooter defining on-going maintenance requirements for the collection system, in conjunction with the lack of documentation of routine maintenance, it is likely that routine maintenance is being overlooked.

Alto Sanitary District currently does not have a method to estimate either base-flow or the wet-weather flows being discharged to the SASM wastewater treatment plant. The District is billed by the SASM wastewater treatment plant based on the number of connections (EDUs) rather than flow. When asked about dry weather and wet-weather flows, Mr. Roberts stated that flow to the SASM wastewater treatment plant could increase by a factor of 10, from approximately 2.5 million gallons per day (MGD) to 25 MGD, indicating flows from the District may also be increasing by relatively the same proportion. Mr. Roberts said that smoke testing was conducted “many years ago” and that significant infiltration and intrusion (I&I) was suspected; however, the District has not historically had a preventative I&I program in the collection system. According to Mr. Roberts, the District has embarked on a program for replacing and rehabilitating old sewers which are likely a source of some I&I into the system.

**Attachment 1**

**ALTO SANITARY DISTRICT ANNUAL REPORT OF SANITARY SEWER  
OVERFLOWS FOR CALENDAR YEAR 2006**

**ALTO SANITARY DISTRICT**  
P.O. BOX 163, MILL VALLEY, CA 94942 (415) 388-3696

03/22/07

Bruce H. Wolfe, Executive Officer  
California Regional Water Quality Control Board, San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612  
ATTN: Michael Chee

Dear Mr. Wolfe,

**Subject: Annual Report of Sanitary Sewer System Overflows for Calendar Year 2006**

The purpose of this letter is to report the Sanitary Sewer System Overflows (SSOs) that occurred in the **Alto Sanitary District's** sanitary sewer system during the period January 1 through December 31, 2006. This report is submitted pursuant to the requirements included in the San Francisco Bay Regional Water Quality Control Board Letter, New Requirements for Reporting Sanitary Sewer Overflows, dated November 15, 2004.

Number and Size of SSOs

The total number of SSOs for the reporting period was 2. All of the SSOs were associated with gravity sewers. There were 2 SSOs associated with wet weather conditions. The sizes of SSOs are summarized as shown on Table 1.

**Table 1. Number of SSOs**

<b>Size of SSO (gallons)</b>	<b>Number</b>	<b>Percent of Total by Number</b>
Greater than or equal to 1,000	0	0
From 100 to 999	1	50
From 10 to 99	1	50
Less than 10 [can include in line above]	0	0
[Public portion of lateral (if applicable)]		
<b>Total</b>	<b>2</b>	<b>100</b>

The volume of spills contained and returned to the sewer system, as well as the volume reaching waters of the State is shown in Table 2.

**Table 2. Volume of SSOs**

	<b>Volume (gallons)</b>	<b>Percent of Total by Volume</b>
Total volume contained and returned to sewer system for treatment	0	0
Total volume reaching waters of the State	60	38
Total volume not contained but not reaching waters of the State (everything else)	100	62
<b>Total</b>	<b>160</b>	<b>100</b>

One of the SSOs equaled 100 gallons in volume. This report does not include SSOs that occurred from private sewer service laterals within the **Alto Sanitary District's** jurisdiction that were caused by conditions in privately-owned laterals or on private property. The property owners are responsible for the condition and the operation of those sewer service laterals.

Cause of SSOs

The predominant cause[s] of SSOs during the period of this report was stoppages caused by tree root intrusion. The distribution of SSOs by cause is shown on Table 3.

**Table 3. Causes of SSOs**

<u>Cause of SSO</u>	<u>Number</u>	<u>Percent of Total</u>
Blockage:		
Roots	2	100
Grease		
Debris		
Debris from Laterals		
Vandalism		
Animal Carcass		
Construction Debris		
Multiple Causes		
<b>Subtotal for Blockage</b>	<b>2</b>	<b>100</b>

Infrastructure Failure		
Inflow & Infiltration		
Electrical Power Failure		
Flow Capacity Deficiency		
Natural Disaster		
Bypass		
Cause Unknown		
<b>Total</b>	<b>2</b>	<b>100</b>

Location of SSOs

Locations of SSOs are district manholes and rodholes, in paved street areas and in unpaved easements.

Status of Development of Sewer System Management Plan (SSMP)

This district has completed its SSMP which is on file for examination as required.

Other Information

Alto S.D. is a small district with approximately 500 residential units. The sewer system was constructed in the late '40s and early '50s using V.C.P. with mortar joints. Over the years, due to shifting ground conditions and tree root intrusion, maintenance of the old pipes has become an ever-increasing problem, and over the past several years we have embarked on a program for replacing and rehabilitating the old sewers, beginning with the worst ones. We are currently completing the second contract for the rehabilitation of the sewers in our system.

Certification

I certify under penalty of law that this document was prepared by me and the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Tom Roberts  
Manager

# Roto Rooter

## After Hour / Weekend / Holiday Response Checklist

- 1) Stoppage Location: 2 MEADOW MILL VALLEY
- 2) Arrival Time: 9:00  AM /  PM
- 3) Notified District for Building Flooding:  Yes /  No \_\_\_\_\_  
Name
- 4) Notified District for Spills over 1000 gallons: Yes / No \_\_\_\_\_  
Name
- 5) Sewer cleared within 1 hour:  Yes /  No  
(Less than 5 gallons per minute)
- 6) Sewer cleared within 1 hour: Yes / No  
(More than 5 gallons per minute)
- 7) Date & Time spill was detected: 11-10-6 8:45  AM /  PM  
Date Time
- 8) Method used to clear stoppage: MAINLINE MACHINE & RODDER
- 9) Cause of stoppage: ROOTS
- 10) Gallons per minute: 5 gal
- 11) Estimated total gallons spilled: 100 gal
- 12) Where did spill drain to: YARD
- 13) People who responded to the stoppage: KIER/AWEN/JOHN H.
- 14) Is this a district problem? YES (If yes, charge 2hr minimum)
- 15) Is this a private lateral problem? NO (If yes, charge 1hr minimum)

District Contact

overflow = 100 gal

Roto Rooter  
Sanitary Stoppages

Spill Reporting Form

- 1) Stoppage Location: 2 shell ct
- 2) Date & Time spill reported: 10-29-6 6:45
- 3) Arrival Time: 6:45 Time Overflow Stopped: 7:45
- 4) Notified District:  Yes / No
- 5) Method used to clear stoppage: 2 & 4" blades + hydro
- 6) Cause of stoppage: roots + grease
- 7) Estimated gallons per minute: 1
- 8) Where did spill drain to: Cutter
- 9) Personnel who responded to the stoppage: David + John H.

DISTRICT CONTACT:



Overflow

$$60 \text{ min} \times 1 \text{ gpm} = 60 \text{ gal}$$

**Attachment 2**

**ALTO SANITARY DISTRICT SEWER SYSTEM MANAGEMENT PLAN AS  
PROVIDED TO THE BOARD MEMBERS OF THE ALTO SANITARY DISTRICT**

**ALTO SANITARY DISTRICT**  
P.O. BOX 163, MILL VALLEY, CA 94942 (415) 388-3696

Memorandum

07/31/06

To: Board Members, Alto Sanitary District

From: Tom Roberts, Manager *TR*

Re: Sewer System Management Plan (SSMP)

Enclosed is a draft of the SSMP, the first element of which is due to be submitted to the Regional Water Quality Control Board by 08/31/06. The first element consists of items 1 through 4 of the report; items 5, 6 and 7 are due on 08/31/07 and items 8, 9 and 10 are due 08/31/08. However, Alto SD's program is sufficiently well advanced that there's no reason not to complete and file the full report at this time. It's not likely that the District's circumstances will change to the extent of requiring a re-writing of the latter two elements of the report, but if need arises, it would be possible to file an amended report to address such changes in the future. For example, if a large, grease-producing restaurant or meat packing plant should open in Alto, it might be necessary for the District to set up a FOG program, which we don't have need for at this time.

I reading the report you'll note that the response to some of the items is "Not applicable to this District by reason of minimum population." This is because the guidelines provided by the Regional Board exempt reporting agencies with populations less than 10,000 from responding to those items. Our District is, of course, well below that threshold.

I'm sending this to you as early as possible so that we can formally approve it at the meeting of 08/23. If you have comments or suggested changes, please call me at my home phone, [REDACTED] so we can discuss the matter and, if need be, revisions can be made before the meeting.

**ALTO SANITARY DISTRICT**  
P.O. BOX 163, MILL VALLEY, CA 94942 (415) 388-3696

**SEWER SYSTEM MANAGEMENT PLAN**

Adopted by the Alto Sanitary District  
Board of Directors on August 23, 2006

**District Overview**

The Alto District is an unincorporated suburban residential area located adjacent to and northeast of the City of Mill Valley. The District has an estimated population of about 1200. The Sanitary District has one part-time employee, the Manager. The District has no plant or equipment. All maintenance, engineering and other professional services are performed under contract with outside firms. The Alto District is one of six agencies which have formed the Joint Powers Authority known as the Sewerage Agency of Southern Marin (SASM). Sewage collected by these districts, including Alto, is conveyed to the SASM treatment plant, which is operated by the City of Mill Valley under contract with SASM.

The Alto sewer system was constructed in the late 1940s and early '50s, and consists of approximately six miles of gravity sewers; there are no pump stations maintained by the District. The system consists mostly of six-inch vitrified clay pipe, and over the years, due to ground shifting and other causes the pipes have developed many cracks, offset joints and other problems typical of such systems. It is subject to considerable root-intrusion. Accordingly, several years ago the District embarked on a program to replace and/or rehabilitate the old pipes through a phased program. The District's Engineering Consultant, Nute Engineering, and our Maintenance Contractor, Roto Rooter Sewer Service, have televised the District's system and have evaluated the problem sites. Roto Rooter has been assigned the task of addressing point-source problems, and Nute Engineering prepares construction contracts for the rehabilitation program.

**1. Goals**

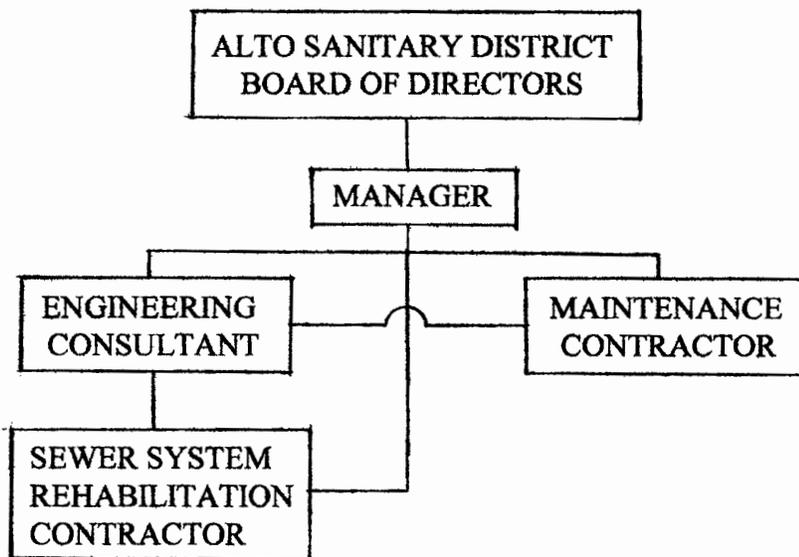
To achieve zero Sewer System Overflows (SSOs).

To manage, operate and maintain the District's sewer system in an efficient, cost-effective manner.

To upgrade the District system to reduce to as great an extent as possible the problems associated with an aging infrastructure.

To act in the best interest of the District's residents in all matters relating to the operation and maintenance of their sewer system.

**2. Organization**



**ALTO SANITARY DISTRICT BOARD OF DIRECTORS:** Adopts District policies and plans. Approves budget to implement maintenance and rehabilitation programs. Represents the District in all matters pertaining to operation of the sewer system.

**MANAGER:** Conducts the day-to-day business activities of the District; oversees the maintenance and operation of the District's sewer system; coordinates the activities of the Maintenance Contractor and the Engineering Consultant; writes SSMP and other reports required by regulatory agencies.

**ENGINEERING CONSULTANT:** Provides technical expertise in assessing the condition of the District's system leading to the preparation of rehabilitation projects; coordinates findings determined by Maintenance Contractor into the rehabilitation program; prepares contracts for the implementation of the program; provides field engineering for construction while work is in progress.

**MAINTENANCE CONTRACTOR:** Provides emergency service to stop overflows immediately upon notification; under direction of the Manager, performs the District's periodic cleaning and preventive maintenance program; provides emergency sewer repair and/or replacement in situations where preparing and awarding a contract would expose the public to the risk of sewage overflows.

**SEWER SYSTEM REHABILITATION CONTRACTOR:** Under contracts prepared by the Engineering Consultant and awarded by the Board of Directors, the Contractor performs sewer rehabilitation and/or replacement projects.

**3. Overflow Emergency Response Plan**

The Alto Sanitary District has arranged with the firm of Roto Rooter Sewer Service to provide emergency response, 24/7, to all calls from residents of the District reporting sewage overflows. Each service technician has been provided with a set of the District's system maps to facilitate their efforts. The Maintenance Contractor immediately advises the Manager of exceptional problems, and as necessary the Engineering Consultant is brought into the matter to recommend procedures for remedying the situation.

**4. Fats, Oils and Grease (FOG) Control Program**

A FOG control program is not needed for the Alto Sanitary District because the District has no restaurants or other sources where fats, oils or grease are generated.

**5. Legal Authority**

*(Not applicable to this District by reason of minimum population.)*

**6. Measures and Activities**

**(a) Collection System Map**

In 2002 the District directed its Engineering Consultant to prepare a set of maps of the District's collection system. The maps have since been put to extensive use. They are utilized by the Maintenance Contractor in the day-to-day maintenance of the system and for emergency service calls, and by the Engineering Consultant for evaluation of the system's condition and for establishing priorities for rehabilitation projects.

**(b) Resources and Budget**

The Alto Sanitary District is an "Enterprise District" and derives its operating funds principally from service charges levied on the District's property owners. The charges are collected in the tax rolls by the County of Marin. The service charges are currently \$285 per EDU per year. This amount is considered adequate to fund the administration of the District as well as the rehabilitation program. The District prepares an annual budget which is submitted to the County's Auditor-Controller's Office. The major categories included in the District's budget for fiscal 2006-07 are as follows:

System rehabilitation program & engineering services:	300,000	70%
Sewage treatment (SASM assessment):	79,300	19%
System maintenance:	20,000	5%
District administration costs:	<u>24,700</u>	<u>6%</u>
Total expenditures budgeted for Fiscal 2006-07:	424,000	100%

**(c) Prioritized Preventive Maintenance**

In the evaluation of the District's system based on televising survey performed by Roto Rooter, our Engineering Consultant, Nute Engineering, has listed existing point-sources of problems within the system, and these have been assigned to Roto Rooter to remedy.

In addition, as new or recurring problem areas are uncovered in the course of other maintenance activities they are entered into the inventory of problems to be addressed, and are dealt with according to their severity.

The District has a cleaning program under which all the sewers in the system are cleaned at least once every several years. Problem areas are cleaned annually, or as frequently as each situation requires.

**(d) Scheduled Inspections and Condition Assessment**

The District recently completed the televising of all the sewers in the system. It is intended that the system will be re-examined periodically as need be to provide the Engineering Consultant, the Maintenance Contractor and the District with current information.

**(e) Contingency Equipment and Replacement Inventories**

*(Not applicable to this District by reason of minimum population.)*

**(f) Training**

*(Not applicable to this District as it has no operating staff.)*

**(g) Outreach to Plumbers and Building Contractors**

*(Not applicable to this District by reason of minimum population.)*

**7. Design and Construction Standards**

**(a) Standards for Installation, Rehabilitation and Repair**

The Alto Sanitary District follows construction standards established by its Engineering Consultant, Nute Engineering, for sewer extensions and connections. The District further requires contractors to adhere to the construction standards set forth by the County of Marin for pavement restoration and other work within the County's authority. These standards have been found to be appropriate and adequate for the District's purposes; if and when need arises, the standards will be expanded and/or modified to follow changing technologies and construction methods.

**(b) Standards for Inspection and Testing of New and Rehabilitated Facilities**

The Alto sewer system is essentially complete, and the only new construction is the replacement and/or rehabilitation of existing facilities. This work is done under contract with private construction firms, and is inspected by the District's Engineering Consultant in conjunction with their administration of the contracts. Standards followed for this work are as set forth above.

**8. Capacity Management**

*(Not applicable to this District by reason of minimum population.)*

**9. Monitoring, Measurement, and Program Modifications**

Inasmuch as the Alto Sanitary District is too small to employ a full-time staff, the District has for many years relied on Roto Rooter Sewer Service to respond to emergency calls regarding SSOs. Residents calling in to report an SSO are directed to notify Roto Rooter at a number reserved by Roto Rooter for that purpose. Roto Rooter has personnel on call 24/7, and they have been directed to place the highest priority on calls from District residents reporting overflows. Roto Rooter's response time is usually within one hour of notification. Each Roto Rooter vehicle carries a set of the District's system maps and little time is lost searching out the source of SSOs, once the service technician is on the scene.

Because of the relative small size of the District, and the close proximity of the homes to each other, there are few instances of SSOs going unreported for any protracted period of time. During the past year there has been only one reported SSO where the flow exceeded an estimated 100 gallons.

In general it can be fairly stated that the Alto Sanitary District is making a strong effort to upgrade an aging system, while at the same time maintaining the system in as serviceable a condition as possible. The Board of Directors have set the sewer service rate at a level which will allow the rehabilitation of the sewer system in accordance with the program set forth by the Engineering Consultant, while at the same time providing sufficient funds for maintaining and operating the old pipes until such time as they can be rehabilitated.

At the present time the Board of Directors believe the rate of the sewer service charge (\$285/EDU/year) is sufficient to continue the SSMP as set forth herein. However, each year the financial status of the District and the demands of the maintenance and operation of the system, and the requirements of the rehabilitation program, are examined in detail. The Board stands ready to go to the rate payers with a proposal to increase the sewer service charge, should the economic inflation, or deterioration of the sewers, so require.

**10. SSMP Audits**

*(Not applicable to this District by reason of minimum population.)*

*Prepared by*

*Tom Roberts. Manager  
July, 2006*

**Attachment 3**

**ALTO SANITARY DISTRICT BUDGET FOR FISCAL YEAR 2007-08**

**ALTO SANITARY DISTRICT**  
**BUDGET FOR FISCAL 2007-08**

	<u>BUDGET</u> <u>AMOUNT</u>
<b>A. <u>INCOME</u></b>	
1. Sewer Service Charges: $513.2 \times 285 =$	146,300
2. Interest on Reserve Fund	9,000
3. MVRs Franchise Fee	12,000
4. Taxes and Assessments	<u>50,000</u>
TOTAL INCOME	217,300
Transfer from Reserve Fund to Balance	<u>207,200</u>
<b>BUDGET AMOUNT</b>	<b>424,500</b>
<b>B. <u>EXPENSES</u></b>	
1. Sewage Treatment (SASM Assessment)	78,900
2. Roto Rooter Services	20,000
3. Rehabilitation Program	250,000
a) Engineering Services	50,000
4. Professional Services	
a) Audit Fee	6,300
b) County's Fees for Servicing Accounts	1,100
5. Stipends, Board's Expenses and Manager's Salary	
a) Director's Stipends: $[85.00 + (75.00 \times 4)] \times 12 =$	4,600
b) Outside Meetings: $(75 \times 7) + 275 =$	800
c) Manager's Salary: $910 \times 12 =$	10,900
6. Liability Insurance	700
7. Professional Associations (MCSDA, USA, LAFCO)	700
8. Office Expenses (Petty cash, telephone, P.O. Box rent)	<u>500</u>
<b>TOTAL EXPENSES</b>	<b>424,500</b>

**JUNE 27, 2007**