

## **Spalding Community Services District**

### **Formal Response to Notice of Violation and Corrective Action Plan**

**NPDES Order No.: Statewide Sanitary Sewer System WDRs (SSS WDRs)**

**CIWQS Enrollee:** Spalding Community Services District

**Date of NOV:** November 20, 2025

**Response Date:** 1/21/26

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### **1. Introduction**

The Spalding Community Services District (CSD) submits this formal response to the Notice of Violation (NOV) dated November 20, 2025, issued by the Lahontan Regional Water Quality Control Board (Regional Board) regarding compliance with the Statewide Sanitary Sewer System Waste Discharge Requirements (SSS WDRs).

The District acknowledges the violations and areas of concern identified during the inspection and appreciates the Regional Board's guidance. Since the inspection, the District has taken steps to strengthen management oversight and is committed to achieving full compliance with all applicable requirements. This response outlines the District's understanding of the violations, root causes, and a corrective action plan with defined timelines.

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### **2. General Statement of Root Causes**

The District recognizes that many of the identified violations stem from:

- Historical staffing limitations
- Lack of formalized written procedures
- Absence of centralized tracking and reporting systems
- Incomplete institutional knowledge transfer
- Limited administrative capacity in a small, rural district

These conditions resulted in gaps in documentation, reporting, preventive maintenance scheduling, training, and planning—not a lack of intent to comply.

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### **3. Response to Violations and Corrective Actions**

## **Violation 1 & 2: Failure to Report Spills and Submit Monthly No-Spill Certifications**

**NOV Reference:** Attachment E1, Sections 3.7 and Spill Reporting Requirements

### **Response:**

The District acknowledges that spill reporting and monthly “No Spill” certifications were not submitted to the CIWQS database, despite staff knowledge of historic spill events.

### **Corrective Actions:**

- Designate the General Manager as the CIWQS oversight authority
- Develop and adopt a written Spill Emergency Response and Reporting Procedure
- Train sewer staff on CIWQS spill reporting and monthly certification requirements
- Begin submitting monthly No-Spill Certifications immediately

### **Completion Timeline:**

- Procedure adopted: within 30 days
  - Staff training: within 45 days
  - Monthly certifications: ongoing
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## **Violation 3: Failure to Submit Annual Reports and Questionnaires**

**NOV Reference:** Attachment E1, Section 3.9

### **Response:**

The District acknowledges failure to submit Annual Reports for 2023 and 2024 and to update prior Annual Questionnaires.

### **Corrective Actions:**

- Compile and submit delinquent Annual Reports for 2023 and 2024
- Update and submit all outstanding Annual Questionnaires
- Establish an annual compliance calendar with internal deadlines

### **Completion Timeline:**

- Backlogged reports submitted: within 60 days
- Compliance calendar implemented: within 30 days

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**Violation 4: SSMP Not Uploaded and Audits Not Conducted**

**NOV Reference:** Specifications 5.3 and 5.4

**Response:**

The District acknowledges that the SSMP has not been uploaded to CIWQS and triennial audits were not performed.

**Corrective Actions:**

- Finalize and adopt an updated SSMP aligned with SSS WDR outline
- Upload SSMP to CIWQS following Board adoption
- Establish a triennial SSMP audit schedule and documentation process

**Completion Timeline:**

- SSMP finalized and adopted: within 90 days
- CIWQS upload: within 10 days of adoption
- Audit schedule established: within 30 days

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**Violations 5, 6 & 7: Lack of CCTV, Cleaning, and Preventive Maintenance Scheduling**

**NOV Reference:** Attachment D, Section 4.2

**Response:**

The District acknowledges that preventive maintenance activities are not currently tracked through a formal scheduling system.

**Corrective Actions:**

- Develop a preventive maintenance program for:
  - CCTV inspections
  - Gravity line and lift station cleaning
  - Routine inspections
- Implement a maintenance log (digital)
- Prioritize known problem areas

**Completion Timeline:**

- Maintenance program established: within 90 days
  - Logging system implemented: within 60 days
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**Violations 8 & 10: Lack of Staff and Contractor Training**

**NOV Reference:** Attachment D, Sections 4.3 and 6

**Response:**

The District acknowledges that regular training has not been formally provided or documented.

**Corrective Actions:**

- Develop an annual training program covering:
  - SSS WDR requirements
  - Spill Emergency Response Plan (SERP)
  - Volume estimation
  - CIWQS reporting
- Require contractor acknowledgment of SERP training

**Completion Timeline:**

- Training program established: within 60 days
  - Initial training completed: within 90 days
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**Violation 9, 11 & 12: No CIP, Prioritization System, or Climate Vulnerability Assessment**

**NOV Reference:** Specification 5.6; Attachment D Sections 8.1 and 8.4

**Response:**

The District acknowledges the absence of a Capital Improvement Plan (CIP), asset prioritization framework, and climate vulnerability assessment.

**Corrective Actions:**

- Perform a system-wide asset inventory and condition assessment

- Develop a prioritized CIP
- Conduct a climate change vulnerability assessment
- Align CIP with available grant and funding opportunities

**Completion Timeline:**

- Asset inventory: within 90 days
  - CIP draft: within 120 days
  - Climate assessment: within 150 days
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**Violation 13: Lack of Spill Containment Equipment**

**NOV Reference:** Specification 5.7; Attachment D Section 6

**Response:**

The District acknowledges insufficient spill response equipment.

**Corrective Actions:**

- Purchase and stage spill containment kits at lift stations
- Include equipment inventory in SSMP
- Train staff on deployment

**Completion Timeline:**

- Equipment acquired: as funding permits
  - Training completed: as equipment is obtained
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**Violation 14: Incomplete System Mapping**

**NOV Reference:** Attachment D, Section 4.1

**Response:**

The District acknowledges that system mapping is incomplete.

**Corrective Actions:**

- Compile existing maps and records
- Develop a complete GIS or equivalent system map

- Update map as assets are identified

**Completion Timeline:**

- Preliminary map completed: within 90 days
  - Ongoing updates: continuous
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**Violation 15: Lack of Inspection of Siphons and Air Relief Valves**

**NOV Reference:** Attachment D, Section 8.1

**Corrective Actions:**

- Identify and inventory all siphons and air relief valves
- Establish inspection and testing schedule
- Document inspections

**Completion Timeline:**

- Inventory completed: within 60 days
  - Inspection schedule implemented: within 90 days
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**Violation 16: Insufficient Staffing**

**NOV Reference:** Specification 5.7

**Response:**

The District acknowledges staffing limitations.

**Corrective Actions:**

- Evaluate staffing needs
- Explore shared services, contractors, and funding options
- Align staffing plan with CIP and budget planning

**Completion Timeline:**

- Staffing evaluation completed: within 90 days
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#### **4. Response to Areas of Concern**

The District commits to addressing all Areas of Concern, including:

- Installing emergency signage and alarms at lift stations
  - Implementing a public complaint tracking system
  - Regularly exercising system assets
  - Establishing permanent General Manager oversight
  - Developing a root control program
  - Revising the SSMP to follow the required SSS WDR outline
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#### **5. Certification**

The District certifies that the information provided herein is true and accurate to the best of its knowledge and that it is committed to achieving and maintaining full compliance with the SSS WDRs.

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