

# USEPA Region 5 CMOM Initiative

June 16, 2005  
Cleveland, OH

Capacity,  
Management,  
Operation &  
Maintenance for  
Sanitary Sewer Systems

- Northeast Ohio Satellite Communities

# National Water Priorities

- Goal of fishable, swimmable waters
- Healthy Watersheds – addressing impairments so that waters can meet designated uses
- Wet weather - CSOs, SSOs, storm water and CAFOs



# Regional Priorities

- Waters/beaches safe for swimming and recreation
- Commitments to OECA
- We have targeted our work/resources in 4 specific watersheds
- Our Strategic Plan includes implementing CMOM in the Cleveland area

# What is US EPA's interest in the Cleveland Area?

- Lake Erie (international and interstate water, irreplaceable economic and recreational resource)
- Cuyahoga River (designated American Heritage River)
- Aquatic Health of sensitive areas throughout the watershed
- Despite progress made to date, Lower Cuyahoga River water quality still impaired



# Progress on TMDLs

- Lower Cuyahoga TMDL approved in 2003 for nutrients and pathogens
- Upper Cuyahoga TMDL approved in 2004 -- 20 segments addressed sediment and phosphorus
- CSO work / Long Term Control Plan coordination

# Approaches

- Combination of traditional tools and voluntary efforts
- Working as partners with communities to solve wet weather problems
- Providing incentives to achieve results
- Working on a watershed scale

# Letter Inviting Participation

## Key Messages

- Opportunity to use a self assessment process
- Obtain water quality improvements as soon as possible
- Work with EPA to identify problems and work out a plan and schedule for correction
- Significant benefits in the form of more flexible schedules and significantly reduced or, in some instances, eliminated penalties
- Correction plans and schedules will be less prescriptive and more goal-oriented

# Causes of Water Quality Impairments to the Cuyahoga River

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- CSOs
- SSOs
- Stormwater
- Failing Septic Systems
- Industrial Discharges
- Habitat Alteration

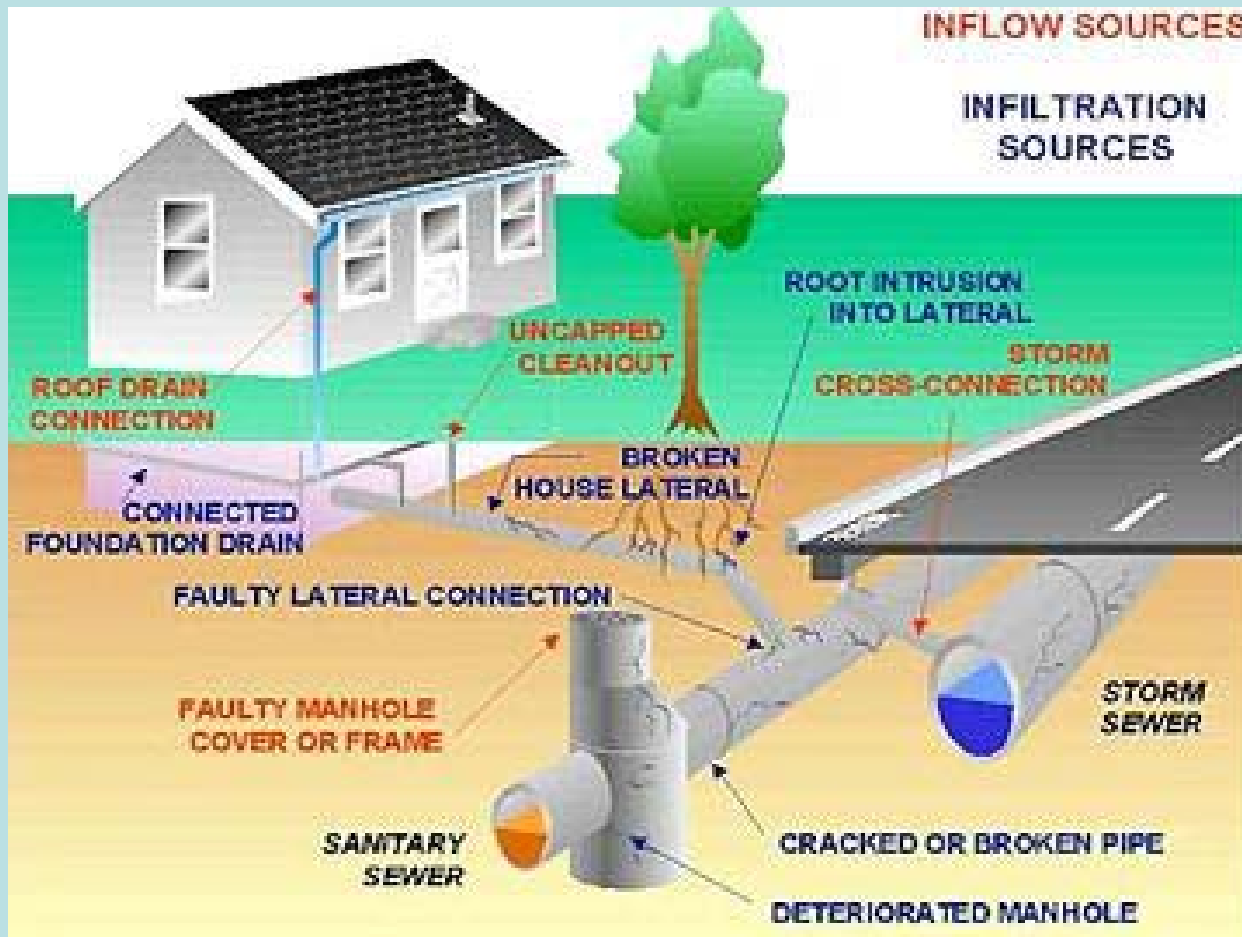
# Sanitary Sewer Overflow (SSO) Facts

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- A SSO is a release of sewage from a separate sanitary sewer system
- Any SSO is **ILLEGAL**
- All SSOs, regardless of cause, must be reported to the Ohio Environmental Protection Agency



# What Causes SSOs?



# Sanitary Sewer Overflows (SSOs)

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- **Overflowing manholes**
- **Basement backups**
- **Pump station overflows**
- **Flows from broken sewer mains**
- **Any flows from the sewer system that are not conveyed to the WWTP**

# Typical SSOs

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# EPA's Traditional Approach

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- **Conduct evaluation/inspection**
- **Identify violations**
- **Initiate enforcement action**
- **Impose unilateral schedule**
- **Require full compliance on imposed schedule**
- **Collect Penalty**

# **Capacity, Management, Operation and Maintenance (CMOM) Program**

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**Goal: Communities will have  
adequate programs in place  
to manage their collection  
system assets**

# Letter Inviting Participation

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- **SSOs can create public health problems in Cuyahoga River watershed**
- **Enforcement action usually pursued**
- **Opportunity and benefits of voluntary self-assessment – any penalties may be reduced, more flexible schedule and corrective actions**

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- **Letter sent inviting Northeast Ohio satellite communities to conduct self-assessment**
- **Meeting with the satellite communities**
- **Communities decide whether to participate**
- **Participating communities submit self-assessment**

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- **Voluntary self-assessment allows communities to work with EPA to develop site-specific, tailored programs to address problems**
- **Assistance in implementation of a farsighted O&M program that will sustain each municipality's extensive investment**
- **Mutually beneficial implementation schedule**
- **Applicable penalties for past non-compliance are reduced or eliminated**

# CMOM Programs

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## **May Include:**

- **Sewer system assessment and rehabilitation program**
- **Sewer cleaning program**
- **Sewer mapping program**
- **Pump station inspection, operation and maintenance program**

# CMOM Programs (cont)

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- **Capacity analysis**
- **Grease control program**
- **Overflow response (contingency) plan**
- **Periodic audits**
- **Information management system**
- **Training, budgeting, legal authorities**

# For Participating Communities

- **Community self-assessments and/or EPA inspections completed**
- **Where self-assessment shows no issues, continue current CMOM program**
- **Negotiate corrective action or improvement schedules**
- **Implementation of needed or recommended improvements**

# Self-Assessment

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- Generally can be completed by collection system staff
- Can be completed over a 6-month period
- EPA will discuss self-assessments with participating communities

# Self-Assessment Timeline

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- **Communities notify EPA of decision to perform self-assessment (June 30, 2005)**
- **Complete self-assessment and submit report of findings (December 31, 2005)**

# Key Messages

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- **Need to improve water quality in the Cuyahoga River between Akron and Lake Erie**
- **Elimination of SSOs requires cooperative efforts of many entities**
- **Communities benefit through a reduction in any penalties, and by having more flexibility.**
- **EPA will evaluate systems without voluntary self-assessments**

# **For Non-participating Municipalities**

- **An inspection of their collection systems will be completed within the next 2 years**
- **Where inspection finds no compliance issues, a report will be provided to the municipality with recommendations for operation and maintenance improvements**
- **Where non-compliance is identified, a traditional enforcement approach will be followed**

# Web Resources

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- EPA's informational resources are accessible through the web site:

[http://cfpub.epa.gov/npdes/home.cfm?program\\_id=4](http://cfpub.epa.gov/npdes/home.cfm?program_id=4)

## Other web resources:

- APWA publication, *Preparing Sewer Overflow Response Plans: A Guide for Local Government*, available at [www.pubworks.org/catalog](http://www.pubworks.org/catalog) (Water Resources link--[www.apwa.net/bookstore](http://www.apwa.net/bookstore))
- Local Government Environmental Assistance Network website at [www.lgean.org](http://www.lgean.org)

# Region 5 CMOM Contacts

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