Introduction

- When the Town’s EPA discharge permit was reissued in 2005, new sewer system management and maintenance requirements were included
- This program is known as CMOM (Capacity, Management, Operations, and Maintenance)
- Under the CMOM program the Town is required to identify, clean, and inspect all of the sewer pipes and manholes in Town
- Treatment plant staff has been busy cleaning and assessing the condition of the accessible portion of the system
CMOM Goals

- Provide uninterrupted, reliable and cost effective service to residents, business, commercial enterprises, and industry
- Provide a logical and cost effective road map of where we are today and where we are going in the future
- Meet permit requirements (prevent Sanitary Sewer Overflows-SSO's)

SSO
The permittee, must:
- properly manage, operate and maintain, at all times, all parts of collection system;
- provide adequate capacity to convey base flows and peak flows;
- take all feasible steps to stop, and mitigate the impact of, sanitary sewer overflows in portions of the collection system; and
- provide notification to parties with a reasonable potential for exposure to pollutants associated with the overflow event.
- develop a written summary of your CMOM program and make it, and the audit, available to any member of the public upon request.

EPA Enforcement

EPA proposes $157,500 in fines for Keene

Penalties: Agency cites violation of clean water law; city says it's been working on complying

By STEPHEN SLOTT

KEENE - The U.S. Environmental Protection Agency is proposing fines of up to $157,500 against the city for violating federal clean water laws at its wastewater treatment plant and in its sewer collection system.

The proposed penalties stem from an administrative order issued in September requiring the city to set aside a $3 million retrofitting with the Clean Water Act. Assistant Director of Public Works Geoff Overton said the city has already been working on similar rehabilitation since 2011, and the agency was not aware of any problems at the wastewater treatment plant.

Specifically, the city was required to implement and adopt a plan to remove material destruction, evaluate slides, and collection system access. The agency estimated it would take a year to complete the project, including a permit needs assessment. Following a review, the agency determined that the city had not been in compliance. The fines are an effort to hold the city accountable for the violation.

"The city has been working on this issue for some time, but it has not been able to fully address the problem," said Overton. "We have been working with the city to address this issue, and we believe the settlement is a fair resolution."
EPA SSO Enforcement Actions

<table>
<thead>
<tr>
<th>Community</th>
<th>Type of Violations</th>
<th>Penalty</th>
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</thead>
<tbody>
<tr>
<td>Branford, CT</td>
<td>Dry &amp; Wet Weather SSOs</td>
<td>$300,000</td>
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<tr>
<td>Greenwich, CT</td>
<td>Dry &amp; Wet Weather SSOs associated with blockages and structural integrity issues</td>
<td>$285,000</td>
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<tr>
<td>Waterbury, CT</td>
<td>Dry weather maintenance-related SSOs</td>
<td>$350,000</td>
</tr>
<tr>
<td>Hartford MDC *</td>
<td>Wet &amp; Dry weather SSOs</td>
<td>$850,000</td>
</tr>
<tr>
<td>Winchendon, MA</td>
<td>Wet Weather SSOs + Effluent Violations</td>
<td>$ 45,000</td>
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</tbody>
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Collection System

- The Town currently owns approximately 90 miles of sewer lines ranging in size from 8” diameter pipe to 48”, 1,500 manholes, and six pumping stations.
- Approximately 11 miles of this total is cross country or 12%, i.e. the pipes are typically located on private property and not in Town streets and thus are not easily accessible.
- Six miles of this total is the main interceptor that runs north to south along the railroad tracks.
Cross Country Easement Recovery Program

- In Phase 1, we hired a surveyor to survey the easements and do a deed search on each property. This Phase was completed in 2010. Each permanent easement is 20' wide
- Phase II involves clearing the easements that have overgrown
- Phase III will clean, video, and assess the condition of manholes and pipes

Phase II Details

- Currently out to bid with an RFP to select a qualified land clearing company
- Anticipate company selection, contract signing and purchase order issued prior to the end of June
- Project will be done over a three year period to allow us to monitor activities, address issues as they arise, and determine if the selected contractor is performing as expected
- Phase II was approved in this fiscal years budget (FY 12-13)
Phase II Implementation

- Notify land owners and abutters of project by letter-June
- Meet with land owners to discuss details of project and discuss any access issues
- Issues: Fences, trees, sheds, etc. on easements
- Project to start in November when leaves are down and ground is firm and dry
- Permits to work in wetlands may be needed

Projects (15)

- Interceptor to DW Highway
- Back River Rd to Belmont Rd.
- Constance St. to Windover Ln.
- Bedford Rd. to Ministerial Dr.
- Baboosic Brook to Ministerial Dr.
- Interceptor to Front St.
- Interceptor to McGaw Bridge Rd.
- Jessica Dr. to Turkey Hill Rd.
- Conifer St. to Edwards Ln and T. Hill
- Hemlock St. to Souhegan River
- Olympic Village to Turkey Hill Rd.
- Bigwood Dr. to Executive Park Dr.
- Island Dr. to Thornton's Ferry P.S.
- Lorraine Rd. to Christina Dr.
- Joey Rd. to Natcook Rd.
Projects For 2013 (feet)

- Constance St. to Level St. 3,026’
- Interceptor to McGaw Bridge Rd. 2,129
- Lorraine Rd. to Christina Dr. 1,828’
- Joey Rd. to Naticook Rd. 1,182’
- TOTAL 8,165’

Level to Cathy Streets
Conclusions

- Good business practice to maintain and evaluate collection system
- Multi year project to define, clear, and then evaluate all cross country sewer lines
- Phase II should take 3 years to complete
- Continue to fund this project in future years until complete