

ES.1 CMOM Program Background

The Milwaukee Metropolitan Sewerage District (MMSD or District) has prepared this Capacity, Management, Operations and Maintenance (CMOM) Program Documentation to satisfy a requirement of the stipulation agreement (Stipulation) (1) entered into between the District and the State of Wisconsin in May of 2002.

CMOM principles were proposed by the United States Environmental Protection Agency (USEPA) in 2001 as a part of the draft Sanitary Sewer Overflow (SSO) rule (2) that was subsequently withdrawn. The withdrawn SSO rule, although never formally adopted, was considered, in the absence of other guidance, in the development of the District CMOM Program.

This document describes the goals of the District CMOM Program, as well as the means and methods that the District has in place and is implementing to achieve the goals and ensure execution of the CMOM program.

ES.2 CMOM Program Development

The District retained Brown and Caldwell (Consultant) in 2002 to guide the District through the process of developing a CMOM Program. The Consultant used: 1) The withdrawn SSO Rule; 2) The Management, Operations and Maintenance (MOM) checklist from USEPA Region 4; and 3) Consultant staff that was experienced with CMOM principles and practices to develop the framework for conducting a CMOM Readiness Review.

The Readiness Review consisted of the Consultant interviewing District staff, reviewing District documents, and conducting field visits. The information gathered was compared to checklists, industry practices, and District goals. The comparison resulted in a description of the gaps that existed between where the District is and where it desires to be. This information and analysis was compiled into the *MMSD CMOM Readiness Review and Implementation Strategy Development (CMOM Strategic Plan)*, which was completed in December 2005. The *CMOM Strategic Plan* recommended a variety of standards, actions, and procedures to be investigated and incorporated into the District's CMOM Program. The District used this document as the guidance for developing and implementing the District CMOM Program as presented in this document.

ES.3 CMOM Program Goals

During the Readiness Review process, the District determined that CMOM principles could be applied not only to its wastewater conveyance system (as CMOM principles were described for), but to the District's wastewater treatment plants and jurisdictional watercourses also. The District then stated a goal for the overall CMOM Program, as well as goals for each of its areas of responsibility of conveyance, treatment, and watercourses.

The overall CMOM Program goal, as developed for and stated in the *CMOM Strategic Plan*, is:

By June 2007, MMSD will develop and implement a cost-effective CMOM Program based upon best practices for wastewater conveyance, wastewater treatment and watercourse management, which results in maximizing the capacity of the existing and planned facilities to convey and treat wastewater, providing flood management, and improving water quality in the MMSD service area. The program must be consistent with goals from other MMSD policies and facilities plans.

The goals for the conveyance, treatment and watercourse areas are (also developed for and stated in the *CMOM Strategic Plan*):

Conveyance

By June 30, 2007, MMSD will implement a CMOM Program with the intent of eliminating all SSOs except those caused by circumstances as defined by Title 40 of the Code of Federal Regulations (CFR) §122.41 (m) (4), and minimizing CSOs in accordance with the current discharge permit.

Treatment

By 2007, the MMSD will implement a CMOM Program for cost-effective wastewater treatment that will achieve and sustain:

- Effluent, biosolids, and air emissions quality meeting or better than regulatory and permit requirements.
- Sustain operational readiness, reliability, and redundancy for liquid and solids processing.
- Achieve AM implementation.
- Improve coordination of wastewater treatment plant operations with collection system facilities and staff.
- Improve proper work management related to maintenance.

Watercourse

MMSD will implement a CMOM Program intended to minimize the risk of flooding associated with the one percent probability flood event to habitable structures along jurisdictional streams in an environmentally responsible and cost-effective manner, through updating and implementing its Watercourse Management Plan.

ES.4 CMOM Program Components

The District CMOM Program contains the chapters described below, which address specific requirements of the CMOM Program as listed in the Stipulation. The chapters contain language addressing how the District is applying CMOM principles to its conveyance, treatment, and watercourse facilities.

Management Plan (Chapter 2)

The Management Plan contains the goals and objectives, organizational structure to manage the CMOM Program, legal authority to control I/I, design criteria, benchmarking methods, performance measures and reporting methods for CMOM compliance reviews.

Asset Management Plan (Chapter 3)

The Asset Management Plan contains the immediate, near-term and long-term actions the District intends to implement regarding its assets. It addresses the vision, organization and planning for the asset management plan, as well as asset needs such as asset knowledge, asset planning, asset refurbishment and replacement, asset development, asset operation and maintenance, asset condition monitoring, asset financing and asset financial reporting.

Overflow Response Plan (Chapter 4)

The Overflow Response Plan contains the District procedures for being aware of, responding to and reporting of overflows. The response includes review and analysis to develop corrective actions, where necessary, to prevent future overflows.

System Evaluation and Capacity Assurance Plan (Chapter 5)

The System Evaluation and Capacity Assurance Plan contains the District's capacity evaluations for wastewater conveyance, wastewater treatment and watercourse systems. This plan includes descriptions of the generation of flows and loadings, system responses and identification of deficiencies relative to the desired level of protection against overflows and flooding.

Communication Plan (Chapter 6)

The Communication Plan contains the District plan for communicating its CMOM Program to stakeholders, including internal, regulatory and public stakeholders, as well as receiving feedback from stakeholders.

Audit Plan (Chapter 7)

The Audit Plan contains the District plan for conducting an audit of the entire CMOM Program in the year 2012.

Satellite CMOM Effort (Chapter 8)

Chapter 8 describes the efforts that the District has taken to date and has planned for the future to meet the Stipulation requirements regarding inclusion of the satellite municipalities and development of a regional CMOM Program.

The Program, including objectives, strategies, tactics and other activities will be subject to change and refinement as the District continues implementing and gains experience with the CMOM Program. Future changes to the CMOM Program will be documented in District CMOM reports.